

Feedback on the EU Disability Rights Strategy 2021-2030

Submitted by Tukena Foundation, Finland

1. Early Childhood Intervention and Family-Centred Services

As a follow up to the Guidance on independent living and inclusion in the community, it is crucial to also focus on the early years, which are key in preventing segregation, institutionalisation and fostering inclusion.

Early Childhood Intervention (ECI) is a field of family-centred, individualised services for children (generally 0–6 years) and their families. These services are crucial for children with disabilities and those at risk of developmental issues, as they support the child in achieving their potential and strengthen family wellbeing.

Evidence from Finland highlights critical gaps that EU action could address:

Our foundation works directly with families of children with disabilities across Finland. Based on systematic engagement with these families, we observe that:

- Children with clearly visible disabilities typically access services faster, while those with less apparent support needs face significant delays in receiving help
- Families must often navigate complex professional networks largely on their own, with limited proactive planning from service providers
- The coordination burden falls disproportionately on mothers, reinforcing gendered care responsibilities and exhausting families
- Transition points across the life course create service gaps – when children turn 18, support structures often disappear despite continuing needs

The European Commission should therefore:

- Conduct an EU-wide study on ECI national systems, policies and practices, including monitoring and evaluation, the status of implementation of developmental screening, developmental and family assessments, and service procedures in family-centred ECI
 - Develop EU Guidelines on ECI systems for Member States in the form of a Council Recommendation
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2. Disability-Specific Framework for Social Services of Excellence

The voluntary framework on Social Services of General Interest (SSGI) needs to be actionable. In alignment with this and future initiatives, we need a **dedicated framework for disability-specific social services** that recognises the specific needs of individuals with disabilities.

A cross-social services approach only risks overlooking critical nuances in disability support and weakens take-up and impact. In Finland, we see concretely how cost-cutting pressures erode service quality when procurement processes prioritise price over quality.

Co-designing such a framework with all stakeholders – persons with disabilities, families, service providers and authorities – is essential for its success and legitimacy.

3. European Strategy for Welfare Technology and Accessibility

We support a **European Strategy for Welfare Technology and Accessibility**. Welfare technology and accessibility should be positioned as drivers of competitiveness, equality, and social market economy innovation.

A coordinated approach to accessibility, assistive technology, and AI can:

- Foster social inclusion and enhance the impact of support services
- Create a unified European market for accessibility and assistive technology
- Reduce long-term public expenditure on social welfare by promoting sustainable, technology-driven solutions

Additionally, **Assistive Technology Centres** can play a crucial role in de-institutionalisation by providing tailored solutions for independent living in the community.

4. European Data Resource Centre on De-Institutionalisation

We support the establishment of a **European Data Resource Centre on De-Institutionalisation**. The centre would collect data on levels of institutionalisation, policy effectiveness and progress over time. Granular data would enable evidence-based policy and monitoring of reforms.

5. Legal Capacity and Supported Decision-Making

We call on the Commission to conduct an **EU-wide study on legal capacity and supported decision-making**. The study should assess current legal capacity frameworks across Member States and identify best practices in supported decision-making systems. The goal is to identify gaps and promote rights-based reforms.

In Finland, families report that guardianship legislation and the service system do not sufficiently support the voice and self-determination of persons with disabilities across the life course.

6. Overarching Principle: EU Social Funding

We emphasise the importance of strengthening enabling conditions and monitoring of EU social funding. **Earmarking funding at least for social inclusion** is necessary to achieve the Strategy's objectives.

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