

Mobility for people with disabilities in the EU: next steps

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Policy recommendations

- People with disabilities who move from one European Union (EU) Member State to another need both to revalidate their disability status and apply for social benefits in their new place of residence. This means, de facto, that it can take years before their disability is recognised and their social benefits secured.
- There should be cross-border recognition of disability status and exportability of social benefits for work or study in all EU countries. To this end, disability assessment methods should be standardised in all Member States and national procedures for accessing disability benefits should not be required when the latter have already been granted in another EU country.
- It is essential to strengthen mechanisms that assess the applicability of EU Regulations and Directives guaranteeing the rights of people with disabilities, with a view to making all mobility-related goods and services accessible, including transport systems, documentation and ticketing, assistance services and information and communication technologies (ICT).
- A reliable and up-to-date database on the mobility of people with disabilities should be established to calculate how many people with disabilities move between EU countries annually, to differentiate the reasons for cross-border mobility and to identify the number of workers with disabilities who have been able to export their social benefits legally and effectively.

Introduction

The right to move freely between and reside in Member States of the European Union (EU) is established in Article 21(1) of the Treaty on the Functioning of the European Union (TFEU) and the EU Charter of Fundamental Rights (Article 45). This implies that all EU citizens may travel to and reside in another Member State as students, jobseekers or workers and enjoy the same opportunities and social rights as nationals of that country.

This is often not the case, however, especially when we put people with disabilities at the centre of the analysis. They face even more barriers to exercising their free mobility and transferring their benefits than people without disabilities (Park et al. 2023). Moreover, analysing the mobility of people with disabilities is challenging because data are lacking at European level, and the current data landscape focuses only on projection of their mobility for leisure and tourism purposes.

With reference to persons with disabilities, the European Disability Forum means those who have long-term physical, mental, intellectual or sensory impairments that, in interaction with various barriers, may hinder their full and effective participation in society with others on an equal basis (EDF 2023). Currently, 26.8% of the EU population over the age of 16 has some form of disability, which makes more than 100 million people or one in four adults (Eurostat 2024). People with disabilities are thus the largest minority in the EU.

Physical barriers are one of the initial challenges hindering the exercise of free mobility. Most transport vehicles, such as planes, trains or buses, not to mention the associated stations and infrastructure, are not inclusive in this respect. Most workplaces are not suitably adapted or accessible, either. This means that people with disabilities cannot move from one place to another, cannot perform their job tasks within their own workplace, or must pay for extra services to overcome these restrictions.

As regards the transfer of disability entitlements, legal and administrative constraints are other factors that make it difficult for people with disabilities to exercise their right to employment and mobility within the EU. Disability status and associated benefits are often not recognised between Member States. People have to undergo another disability assessment in the new country of residence and have to wait, sometimes years, to be deemed entitled to social and disability benefits, and without retroactive payments for the period in between. These circumstances make it very difficult for people with disabilities to move for work purposes within the EU.

Against this background, the EU and its Member States signed up to the United Nations Convention on the Rights of Persons with Disabilities (CRPD) in 2011, committing to promote the equal participation of persons with disabilities in all aspects of life. As part of its commitment to the CRPD, over the past decade the EU has expanded its legislative framework to protect persons with disabilities and guarantee their rights. At the same time, as flagged by a recent European Trade Union Confederation (ETUC) resolution, trade unions play an important role in informing workers with disabilities of their rights, helping

them to exercise them and advocating for their needs where necessary, as well as ensuring that labour legislation and standards are adapted to their circumstances and demands. Moreover, it is worth mentioning that trade unions also engage in collective bargaining with employers to negotiate improvements in rights and conditions for workers with disabilities.

Therefore, this Policy Brief examines the barriers that hinder the cross-border mobility of people with disabilities within Member States and EU policy efforts to comply with the CRPD. It also provides policy suggestions for the effective implementation of benefit portability and points to further policy actions aimed at guaranteeing their rights, including a strategy for the creation of a more robust disability database that can support evidence-based policymaking.

Barriers to mobility and exportability of social benefits between EU countries

The EU and its Member States do not have a common definition of disability, nor the same procedure for mutual recognition of disability status. Because of this, it has been found that one of the main barriers that people with disabilities face as workers, job seekers or in vocational education is that there is no immediate cross-border recognition of their disability status in their new country of residence (Priestley 2022).

As can be seen in Table 1 (see next page), most Member States use a different method of disability assessment. For example, Denmark and Germany use the ‘medical approach’, which is based on people’s diagnosed medical condition. Bulgaria and Spain, by contrast, use the ‘Barema method’, which is based on disability tables showing the percentage of disability by type of disability. Austria and Poland implement ‘functional capacity assessment’, which focuses on functional limitations in performing certain activities. Finland and the Netherlands are the only ones to use ‘care and support needs assessment’, based on the degree of need for external help that an individual needs to ensure their proper care. Cyprus and Estonia use a ‘holistic approach’, based on an assessment of disability, functional ability and environmental factors, such as the social context.

According to Verschueren (2020), the existence of different methods of disability assessment may lead to a situation in which a person’s percentage of disability and their benefits are not the same between countries. For instance, a person that is considered to have a disability under the *medical approach* in Germany, may be assessed differently under *functional capacity assessment* in Poland, or the *Barema* method in Portugal, leading to discrepancies in the level of benefits or support they are eligible for. As a result, the UN CRPD has highlighted several discrepancies in disability assessments across European countries. In Hungary and Lithuania, for instance, assessment processes and disability definitions focus heavily on impairments, while neglecting the social and relational barriers individuals face; while in Denmark disability benefits are awarded through a holistic sustained rehabilitation process that takes

Table 1 Member States' disability assessment methods

Member State	Medical approach	Barema method	Functional capacity assessment	Care and support needs assessment	Economic loss assessment	Holistic approach
Austria			X			
Belgium			X			
Bulgaria		X				
Croatia		X	X			
Cyprus						X
Czechia			X			
Denmark	X					
Estonia						X
Finland				X		
France		X				
Germany	X					
Greece		X				
Hungary		X				
Ireland	X					
Italy		X				X
Latvia	X					
Lithuania	X					
Luxembourg		X				
Malta	X					
The Netherlands				X	X	
Poland			X			
Portugal		X				
Romania			X			
Slovakia						X
Slovenia	X					
Spain		X				
Sweden			X			

Source: study supporting the Impact assessment of an EU initiative introducing the European Disability Card (European Commission 2023).

into consideration the social and contextual factors of disability over time (Waddington and Priestley 2020).

The upshot of these discrepancies is that citizens have to (re-)complete disability assessment and benefit eligibility procedures in their new country of residence even though they already have this status in their country of origin. As these procedures are often lengthy, opaque and, as a rule, require fluency in the national language, this is a major disincentive for people with disabilities to accept a job offer in another EU country. In particular, it may take years for the new country of residence to officially communicate its decision on disability status and thus entitlement to benefits. It should also be highlighted that institutions in the country of origin often send incomplete documentation for workers with disabilities, which considerably prolongs the claim processing time (De Wispelaere et al. 2023).

As a result of such delays in the recognition of disability and its benefits workers with disabilities may suffer financial losses, delays in receiving medical care or inadequate health care and thus they may be unable to manage daily activities. For example, during the pandemic, vulnerable adults (including workers with disabilities) were unable to obtain the Covid-19 vaccine (or received it later than nationals) because of delays in the recognition of health benefits (Adriaenssens et al. 2021). Likewise – although reliable and up-to-date data are lacking – people with disabilities who cannot prove that they have sufficient resources to live in the new country may not receive the benefits they need or even have their right to reside in that country revoked.

Current efforts to improve the mobility and exportability of social benefits between EU countries

Data collection

People with disabilities often face reduced access to basic social services and a general lack of recognition. In this regard, collecting and producing disability-sensitive data can enable the development of evidence-based policies that will, in turn, make it possible to tackle discrimination and actually promote the inclusion of persons with disabilities (including in cross-border mobility). In other words, reliable and up-to-date disability data at the European level are essential to eliminate discrimination and accelerate efforts towards inclusive policies.

Implementation of the EU Strategy for the Rights of Persons with Disabilities 2021–2030, also in line with the European Pillar of Social Rights (EPSR), led to the creation in 2024 of a thematic section on disability on the Eurostat website (where all data, methodology, publications and information on disability-related statistical legislation are gathered in one place). This resulted in several actions. Annual data on the long-term limitation of activity because of health problems are collected in the EU statistics on income and living conditions (EU-SILC) in order to monitor the poverty, social inclusion and living conditions of persons with disabilities. The European Health Interview Survey (EHIS), which

has been conducted every six years since 2019, includes a disability breakdown for most of its indicators. Additionally, since 2022, the EU Labour Force Survey (LFS) has included the Global Activity Limitation Instrument (GALI) every two years to obtain information on disability-related employment and education. These actions, at least partially, could in the coming years move us towards the establishment of a solid disability-related database.

Mobility and exportability

The EU's legislative framework for regulating services for people with disabilities is aimed at ensuring consistent and uniform protection across all Member States. Key legislation includes:

- Regulation 1107/2006 concerning the rights of persons with disabilities and persons with reduced mobility when travelling by air;
- Regulation (EU) No 1177/2010 concerning the rights of passengers when travelling by sea and inland waterway; and
- Regulation (EU) No 181/2011 concerning the rights of passengers in bus and coach transport.

Additionally, the European Accessibility Act, which took effect in April 2019, requires that all goods and services be accessible, eliminating barriers created by divergent standards in the Member States regarding access to transportation, education and employability (ensuring that people with disabilities can compete and access any job with the same opportunities as people without disabilities). Such EU legislation ensures assistance and protection against discrimination for persons with disabilities in accessing services and products (European Commission 2013).

At the same time, the EU, together with its Member States, proclaimed the European Pillar of Social Rights (EPSR) in 2017, at the Gothenburg Summit. According to Sabato and Corti (2018), the EPSR marks an important milestone in shaping the EU policy agenda, especially for improving social and labour rights. It is worth noting that Pillar 17 of the EPSR is dedicated to the inclusion of persons with disabilities. Among other rights, it underlines the importance of ensuring a dignified life, providing services that enable them to participate in the labour market and designing a working environment adapted to their needs.

As part of this pillar, in 2021 the European Commission launched the European Disability Rights Strategy for the period 2021–2030 as the main framework for action to implement the CRPD. The strategy seeks to protect the right to move and reside freely for people with disabilities throughout the EU, as well as to extend the scope of mutual recognition of disability status in areas such as labour mobility and benefits related to the conditions of service provision. To this end, the strategy also aims to strengthen social protection systems among all Member States to guarantee the rights of people with disabilities when they move to another EU country, as well as to ensure that they have the financial resources and social benefits they need to enjoy a decent standard of living.

In practice, however, progress has been limited in achieving cross-border recognition of disability and access to corresponding benefits. The EU has put in place the issuing of so-called Portable Documents that allow citizens to exercise

and export their rights to social benefits when living or working in an EU country other than their country of origin (Wernick et al., 2023). Unfortunately, no administrative or survey data are yet available on incoming and outgoing cross-border labour mobility (De Wispelaere 2022) of people with disabilities using Portable Documents.

The EU has also created the Electronic Exchange of Social Security Information (EESSI) to facilitate cross-border recognition of rights and to support EU/EEA national authorities in exchanging information more quickly and securely on social security matters, as well as making it easier for citizens to have their sickness, family, unemployment and invalidity benefits recognised across borders. Simultaneously, several Member States have also signed bilateral agreements to guarantee the rights and obligations of posted workers (ELA 2023). The adoption of such bilateral agreements is also considered good practice for both exporting and reducing delays in the processing and recognition of benefits for EU workers, as they increase protection of the labour, mobility and social security rights of workers and jobseekers with disabilities (including their family members).

Moreover, two new initiatives should be highlighted: the European Disability Card and the European Parking Card. The first is aimed at achieving mutual recognition of disability guarantees for, excluding employment, all services, facilities and activities for short stays in other EU Member States (such as free entry, reduced rates, priority access, personal assistance and mobility aids). The second will replace national parking cards and seek to ensure the use of parking spaces and facilities reserved for people with disabilities in all EU countries. In this regard, on 24 April 2024 the European Parliament approved the content of the provisional agreement on the European Disability Card and European Parking Card, and the Council of the EU adopted the final version of both Directives on 14 October 2024 (Belgium's Presidency of the EU Council of the EU played an important role in accelerating its approval). This is an important step in guaranteeing the rights of people with disabilities throughout the EU. From now on, the countdown is on for Member States to issue and accept both cards before 2028 (note the generous – but regrettable – transposition deadline).

Policy recommendations

Create a database on mobility of persons with disabilities and exportability of their rights

It is crucial to estimate the number of people with disabilities moving annually between EU Member States, to differentiate between the reasons for such cross-border mobility and to identify the number of workers with disabilities who have been able to export their social benefits legally and effectively. This is because in order to ensure the protection and assistance of people with disabilities in both their mobility and export of their benefits, it is necessary to have reliable and up-to-date information on the number of people with disabilities affected by this discrimination, as well as the barriers they face on a daily basis.

Recommendations on collecting such information include the following. As a first option, these variables could be incorporated in the Central Register

of EU Citizens (when going to live in another EU country for a period of more than three months) or in the Portable Documents used to certify the status of benefits when citizens move within the EU. This would make it possible to relate demographic and labour variables to both geographical mobility and the exportability of social benefits, respectively.

A second option would be to incorporate a section on transnational labour mobility of people with disabilities in the surveys that are already active. In the case of Eurostat, the possibility could be explored of introducing this aspect of mobility within the Global Activity Limitation Instrument indicator (GALI is a single-item survey instrument used to assess limitations on health-related activity), so that every two years these aspects are covered in the Labour Force Survey (LFS) and the Adult Education Survey (AES). In addition, this issue could also be explored for incorporation in Eurofound's European Working Conditions Surveys (EWCS).

The European Disability Card also opens up the possibility of collecting data on the mobility of people with disabilities between EU countries. A fourth option, taking the example of the European Community Household Panel (ECHP), would be to collect data through a panel survey consisting of annual interviews with a sample of people with a European Disability Card.

Harmonisation of the recognition of disability and disability rights across the EU

It is well known that people with disabilities make fewer journeys than the general population (Park et al. 2023). In this context, the EU's political institutions have an essential role to play in at least two respects. First, policies already in place should be updated and accountability mechanisms for compliance with these policies should be strengthened. Second, it is crucial that people with disabilities and organisations representing their rights (including trade unions) be involved in the design, implementation and evaluation of these public policies, in particular so that these actions are tailored to their needs. The EU can furnish examples of good practice for such involvement of people with disabilities.

In light of the above, the first recommendation is to ensure that all mobility-related goods and services be accessible to people with disabilities, including transport systems, documentation and ticketing, assistance services and information and communication technologies (ICT). The second recommendation is to provide quality assistance at airports, bus/train stations and harbours, and for these services to comply with the same protocols in all EU countries. This is important to facilitate the mobility of people with disabilities, and to ensure accessibility of information and communication, and that quality standards are the same in one country as in another. As a third recommendation, it is essential to strengthen the mechanisms that evaluate the applicability of Regulations and Directives ensuring the rights, services and mobility of people with disabilities.

In the absence of immediate cross-border recognition of disability status and benefits, persons with disabilities are more exposed to financial loss,

delayed medical care, inadequate services or having their residence in the relevant country revoked. Disability assessments, in addition to being time consuming, opaque and requiring a command of the national language, are a disincentive for workers or jobseekers with disabilities to accept a job offer in another EU country. In this regard, the European Disability Forum recognises that the European Disability Card may become a missed opportunity. Although it will facilitate short stays and tourist travel in the EU for people with disabilities, the fact that it does not provide for cross-border opportunities for work and education limits its value added.

Therefore, it is essential to ensure cross-border recognition of disability status and the exportability of social benefits for work or study in all EU countries.

At the same time, the following steps are also recommended. First, to standardise disability assessment methods in all Member States. Second, to dispense with national procedures for accessing disability benefits when the latter have already been granted in another EU country. Both measures would speed up recognition, reduce bureaucracy and prevent people with disabilities from missing out on the benefits they need. The third recommendation is that the European institutions, with the involvement of organisations representing persons with disabilities and trade unions, support Member States by improving disability assessment procedures and supporting the exchange of good practices.

Conclusions

In the past decade the EU has modestly expanded the legislative framework for the protection of people with disabilities, preventing discrimination and providing them with mechanisms to exercise their rights. Examples of this are the consolidation of the EPSR, the European Disability Rights Strategy for 2021–2030, the European Accessibility Act and the European Disability Card. The latter was adopted swiftly under the Belgian Council Presidency in 2024. Nonetheless, there are still many barriers, impediments and discriminations that limit the labour, educational and social participation of people with disabilities. Effective implementation of policies guaranteeing the rights of people with disabilities requires proactive, coherent, conscientious and coordinated work by the various stakeholders at national and EU level, with the essential support of trade unions.

This policy brief has made a number of suggestions to resolve the problems we have discussed (lack of data on the mobility of people with disabilities and exportability of their rights, as well as the lack of harmonisation of disability recognition and rights across the EU). First, data should be collected on mobility and the exportability of rights of people with disabilities working, seeking employment or studying. Second, the mechanisms for the enforcement and evaluation of the accessibility that EU Regulations and Directives claim to guarantee in the field of disability should be strengthened. Finally, it is essential that both the EU and its Member States take a further step in harmonising both the recognition of disability and its portability in terms of social protection, so that EU citizens effectively enjoy the same rights regardless of which of the 27 Member States they choose to live in. By implementing these recommen-

dations, the free movement within the EU of people with disabilities as workers, trainees, apprentices or jobseekers, as well as in vocational education can become a reality.

References

- Adriaenssens L. et al. (2021) Study on the cross-border legal protection of vulnerable adults in the EU: final report, European Commission.
- De Wispelaere F. (2022) Improving the monitoring of posted workers in the EU: towards an exhaustive approach of employment statistics, CESifo Forum, 23 (3), 29–32.
- De Wispelaere F., De Smedt L. and Pacolet J. (2023) Coordination of social security systems at a glance - 2023 statistical report, European Commission.
- EDF (2023) European Disability Card and European Parking Card. EDF analysis of the Commission proposal, European Disability Forum.
- ELA (2023) Report on the cooperation practices, possibilities and challenges between Member States – specifically in relation to the posting of third-country nationals, European Labour Authority.
- European Commission (2013) EU Citizenship Report 2013 – EU citizens: your rights, your future.
- European Commission (2023) Proposal for a Directive establishing the European Disability Card and the European Parking Card for persons with disabilities.
- Eurostat (2024) Level of disability (activity limitation) by sex, age and income quintile. https://ec.europa.eu/eurostat/databrowser/view/hlth_silc_12/default/table?lang=en (accessed 03.07.2024)
- Park K. et al. (2023) Impacts of disability on daily travel behaviour: a systematic review, Transport Reviews, 43 (2), 178–203.
- Priestley M. (2022) Disability assessment, mutual recognition and the EU Disability Card: progress and opportunities, European Parliament’s Policy Department for Citizens’ Rights.
- Sabato S. and Corti F. (2018) ‘The times they are a-changin’? The European pillar of social rights from debates to reality check, in Vanhercke B., Ghailani D. and Sabato S. (eds.) Social Policy in the European Union: State of Play 2018, ETUI, 51–70.
- Verschueren H. (2020) The role and limits of European social security coordination in guaranteeing migrants social benefits, European Journal of Social Security, 22 (4), 390–402.
- Waddington L. and Priestley M. (2020) A human rights approach to disability assessment, Journal of International and Comparative Social Policy, 37 (1), 1–15.
- Wernick A., Banzuzi E. and Mörelius-Wulff A. (2023) Do European smart city developers dream of GDPR-free countries? The pull of global megaprojects in the face of EU smart city compliance and localisation costs, Internet Policy Review, 12 (1), 1–45.

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