



EU Strategy on the Rights of Persons with Disabilities 2021-2030: actions for its 2nd phase

European Disability Forum Position Paper
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European Disability Forum proposals for new actions

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Background

After a meaningful consultation with the European disability movement, in early 2021 the European Commission launched its action plan for its second 10-year EU Strategy on the Rights of Persons with Disabilities. The Strategy runs from 2021 to 2030.

In [this Strategy, released on the 3rd of March 2021](#), the Commission outlined flagship initiatives and actions to help the EU and its Member States implement the UN Convention on the Rights of Persons with Disabilities. These actions run until 2024, just before the Strategy's halfway stage.

The European Commission established a [monitoring framework for the implementation of the Strategy](#). This keeps track of progress in delivering all the flagship initiatives and actions that were promised for the first half of the Strategy. It also provides links to all the final deliverables.

After the European Parliament elections and the appointment of the current European Commission in 2024, there was a period of uncertainty as for the second half of the Strategy. During this period, the UN Committee on the Rights of Persons with Disabilities reviewed the implementation of the UN Convention on the Rights of Persons with Disabilities (UN CRPD) and released a set of [recommendations in April 2025](#), including the call to update the Disability Strategy with new actions. Finally, in November 2025, the Commission announced plans to adopt new actions to enhance the strategy as of the second quarter of 2026.

Purpose of this document

This document will feed into the [public consultation launched by the European Commission concerning the second phase of the Strategy](#). It is based on [EDF's first set of proposals](#) submitted to the Commission in November 2024 with some adaptations based on recent data, further consultations with EDF members, the political context, and key political developments such as the launch of the proposal for the next Multiannual Financial Framework 2028-2034.

This document will outline what the European Disability Forum considers should be the priority actions and flagship initiatives for the coming years. We will present the

actions we feel the EU institutions and its agencies as well as Member States must focus on with urgency, and how these actions can improve the lives of persons with disabilities across the EU and beyond.

The document will mirror the themes and chapters decided on during the launch of the Strategy in 2021. Each chapter will list the flagship initiatives and other actions we propose, and what they should look like in practice.

1. Accessibility – an enabler of rights, autonomy and equality

EDF proposals for the period 2025 to 2030

Flagship initiatives

Flagship 1: European Agency for Accessibility

Establish a new decentralised regulatory European agency for accessibility, based on and building upon the work of the [AccessibleEU centre](#), to support the implementation of all EU harmonised accessibility legislation and continue advancing towards a more accessible Europe. The agency could take inspiration from the [US Access Board](#)¹, and other relevant national agencies.

The responsibilities of the agency can include:

- To provide EU institutions, policymakers, and Member States with **specialised information** on accessibility;
- To provide **policy recommendations** based on scientific evidence and input from the most affected groups, such as persons with disabilities and older people;
- To adopt **accessibility technical specifications (i.e. standards)** in support of specific EU policies and legislation, and in consultation with rights holders and stakeholders;

¹ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards for the built environment, transit vehicles, telecommunications equipment, medical diagnostic equipment, and information technology, including technical assistance to implement them.

- To **support Member States and EU institutions** to implement accessibility policies and standards;
- To carry out **monitoring** of accessibility legislation;
- To **raise awareness** of the importance of accessibility for inclusive societies;
- To hold **regular contact** with persons with disabilities through their representative organisations, accessibility professionals (architects, engineers, designers, ICT professionals...), academia, and industry.

The tasks of such an agency could include:

- **Training:** provide training for professionals in different domains, EU and national public officials and the disability community;
- **Coordination with other EU agencies**, such as the Body of European Regulators on Electronic Communications (BEREC) or the European Rail Agency;
- **Coordination and support to enforcement and redress mechanisms:** at national level (e.g. Market Surveillance Authorities responsible for the Accessibility Act) and EU level (e.g. assisting the EU Ombudsman on enquiries related to accessibility);
- **Research:** conduct studies/projects looking into innovative ways to implement accessibility;
- **Collaboration at a global level:** with other similar bodies (e.g. UN CRPD committee, US Access Board; W3C-Web Accessibility Initiative, etc.).

The Agency should ensure the involvement of persons with disabilities in all of its activities and should include representative organisations of persons with disabilities in its governing structures.

Flagship 2: Legislation on the affordability of assistive technology

Introduce legislation to guarantee the availability and affordability of assistive technologies for persons with disabilities in the EU single market.

Such legislation should tackle the situation of certain national certification schemes preventing persons with disabilities from accessing the most suitable piece of assistive technology for them ([see EDF paper on assistive technologies](#)). This legislation should:

- Ensure that **Assistive Technologies (AT) economic operators and users fully take advantage of the EU internal single market** and benefit from the free movement of products and services. This means setting up a joint mechanism for the mutual certification of relevant AT across countries.
- Guarantee that Member States facilitate **accessible information on available AT** and measures ensuring their **affordability**.
- Establish **independent centres at national level to support in the selection of AT**, taking into account the experience and expectations of the users, as well as the context of use of the AT. Such centres should have a **person-centred approach** towards the selection, use and maintenance of AT.
- Introduce further **flexibility, ease and speed within the national AT delivery models**.
- Encourage **research on innovative assistive solutions** taking advantage of emerging technologies.
- Guarantee the **participation of organisations of persons with disabilities** so AT are developed, deployed and funded with full consideration of users' needs and experiences.

Other actions

Revise Regulation 1107/2006 on the rights of persons with disabilities travelling by air

Ensure **fair an equal air travel through an In-depth revision of [Regulation 1107/2006](#)** on the rights of disabled persons and persons with reduced mobility when travelling by air. This revision should:

- Eradicate the common cases of denial of boarding that still happen to persons with disabilities.

- Introduce the right to swift and fair compensation if the carrier still denies boarding.
- Establish the companies' full liability for damaged or lost mobility equipment, that under the current Regulation 2026/1996 is only classified as luggage. The commission should include this provision in the aforementioned regulation or in other appropriate regulations.

Accessible transport vehicles and infrastructure

Revise existing EU legislation or develop new legislation on the accessibility of transport infrastructure and vehicles, such as trains, buses, planes and boats. This should include the following:

- **Rail Transport:** update [Regulation 1400 / 2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system](#) (TSI-PRM). While this regulation sets accessibility obligations both for rollingstock and stations, there are many gaps, including lack of common requirements on level access and fully independent and spontaneous boarding².
- **Bus and coach Transport:** update and complement with relevant legislation the [UNECE Regulation 107 Uniform provisions concerning the approval of category M2 or M3 vehicles with regard to their general construction](#). While this regulation establishes accessibility requirements for certain type of buses³, significant gaps exist. Among others, there are very few requirements beyond those for physical disabilities⁴ and no requirements at all for infrastructure, including bus stops and terminals.
- **Air Transport:** introduce minimum accessibility requirements for aircrafts and airports as there are no EU rules in this field. Minimum requirements for

² On 2024, the European Commission requested the European Railway Agency (ERA) a recommendation to revise the TSI-PRM. The goal of this revision is to modify or introduce provisions to guarantee, among others, level access. ERA should adopt the recommendation by 2028, which should then be adopted by the European Commission and the Member States.

³ Class I buses with capacity of 22 passengers or more (M2 or M3)

⁴ No obligations visual, tactile or audio information, which clearly excludes visual and hearing-impaired passengers.

aircraft should cover the availability of accessible toilet facilities, the provision of a mandatory cabin wheelchair, the availability of minimum space for the accommodation of assistance dogs and accessibility of visual and audio information provided in the plane (including entertainment equipment).

- **Waterborne Transport:** update [Directive 2010/36](#) on Safety Rules and standards for passenger ships to enhance accessibility provisions.

EU accessibility guidelines on urban public transport infrastructure and vehicles

Develop EU accessibility guidelines for urban public transport systems. Such a documents should provide technical guidance and best practices to local authorities to procure accessible public transport vehicles and infrastructure (such as trams, metros, or buses) by specifying the minimum accessibility features that should be included in the tender. The accessibility features should focus not only on physical accessibility, but also on the understandability of signs, maps and instructions, and the clear announcement of stations/stops to facilitate passenger navigation.

Initiative on the mutual recognition of assistance dogs

Passenger Rights Regulations guarantee the right to travel with an assistance dog free of charge. However, putting this right into practice has proved challenging, especially when it comes to air travel. Due to the lack of EU-wide rules on recognition of assistance dogs, countries and transport operators have developed different approaches to decide what qualifies as an assistance dog. International accreditations systems coexist with national certifications frameworks, which are not always mutually recognised throughout Europe. Furthermore, the lack of appropriate staff training, the divergence of transport requirements and the difficulties in the booking process create a lot of uncertainty for passengers who have a legitimate right to travel with an assistance dog.

To address this, EDF would like to request the European Commission to study the national frameworks on accreditation and certification of assistance dogs and the barriers to the mutual recognition – including by transport operators. Based on the results of this study, the Commission should propose a legislative initiative on mutual recognition that could include a database for the verification of credentials/

accreditations of assistance dogs, a European card or the harmonisation of the upcoming CEN standard on assistance dogs.

Revision of the European Standardisation System

Revise the European Standardisation System to guarantee a fair, accountable, transparent, and inclusive system to develop harmonised European standards. The European Commission should rethink how harmonised European standards in support of EU harmonised legislation and policies are developed, as the European and particularly national standards bodies are not inclusive, nor accessible, for persons with disabilities and their representative organisations. Besides, certain stakeholders, particularly industry representatives have greater influence on the outcomes of the standardisation process compared to civil society organisations. Finally, once adopted, harmonised European standards are not accessible for persons with disabilities to consult, despite being a crucial element to comply with EU legislation and, in most cases, its development was funded by taxpayers' money. Therefore, the European Commission should undertake a thorough revision of the standardisation regulation and propose a different system which ensures a fair and inclusive process for developing harmonised standards. As for accessibility standards this could be done by the European Agency for Accessibility proposed above, or, alternatively, by another dedicated agency focused on developing European standards requested by the Commission for EU laws and policies.

Revision of the Audiovisual Media Services Directive (AVMSD)

Compared to other EU Accessibility laws, which provide specific accessibility requirements that are harmonised across the EU, the AVMSD gives a lot of flexibility to Member States. The general wording of Article 7, with no specific targets on accessible audiovisual content, no clear timelines, no definitions, no standards for access services and no obligation to involve persons with disabilities, has led to different approaches to media accessibility which, in EDF's opinion, are limiting the impact of the Directive for the disability community.

To address this, in the upcoming revision of the AVMSD, the European Commission should:

- Set out stronger accessibility requirements on access to audiovisual media content. This should include concrete targets stating, with clear timelines, what percentage of audiovisual content should be made accessible and for what type of access service.
- Address the lack of accessibility obligations for video-sharing platforms and social media.
- Expand accessibility provisions to include simple or easy-to-read language.

European standards on access services to audiovisual content

While the accessibility requirements of the European Accessibility Act will be supported by six Harmonised European Standards, there are currently no European standards to support the accessibility provisions of the Audiovisual Media Services Directive. This has led to different practices in Member States and little focus on quality of access services. The European Commission should request the development of European Standards on the different access services to audiovisual content (i.e. subtitles for the deaf and hard of hearing, sign language interpretation, audio description and spoken subtitles), including on icons and quality aspects and taking into consideration existing national practices.

Legislation on Accessible Labelling

Introduce legal requirements on accessible labelling to ensure that consumers with disabilities can enjoy increased autonomy and be fully informed of the contents of products they are buying, including food, home appliances, clothes and cleaning products. This could be done either with a new overarching regulation specifying the list of products to be covered by such new accessibility obligations or by amending existing regulations on labelling of [goods sold in the internal market](#), such as the existing ones on food⁵ and textile⁶.

Such new requirements could include the obligation for all product labels to contain a QR code, easily locatable on the packaging using tactile markers. Scanning the QR

⁵ [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers.](#)

⁶ [Regulation \(EU\) No 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products](#)

code with a smartphone should allow consumers to access the information in accessible format. For example:

- access the product name, weight, ingredients expiration date
- give access to instructions on the use of the device being sold, and safety measures
- give access to cooking instructions
- give nutritional information and recommended daily consumption.

Guidance for Member States on implementing accessibility provisions for buildings in the Energy Performance of Buildings Directive

Support Member States with guidance to fully use the accessibility provisions included in Directive 2024/1275 to maximise its potential for making the built environment more accessible for persons with disabilities while ensuring their energy efficiency.

Legislation on equal access to essential services

Introduce internal market legislation ensuring that access to essential services, as defined in the EU Pillar of Social Rights, will be possible through both digital and non-digital means. This will prevent further exclusion due to rapid digitalisation leaving many people, including persons with disabilities, without the possibility of accessing these services through human interaction.

Copyright exemptions on cultural works for accessibility

Introduce copyright exemptions to a larger number of cultural works to facilitate accessible adaptations and availability of these for all persons with disabilities, building upon the success of the Marrakech Treaty for printed materials. Such copyright exemption could also cover access services for audiovisual content (e.g. audio description, subtitles for the deaf and hard of hearing), museum exhibitions (e.g. audio guides, sign language interpretation, easy to understand materials). To give an example, at the moment, due to copyright, the same film must be audio described twice in France and in the French speaking region of Belgium, despite

sharing the same language. Such copyright exemption would facilitate the accessibility provisions of the Audiovisual Media Services Directive.⁷

Earmark EU funds for training on accessibility and communication

Invest EU resources in increasing the knowledge and availability of national sign languages, easy-to-read formats, Braille, speech-to-text and text-to-speech software, and any other accessible means of information and communication for persons with disabilities.

Single Digital Booking and Ticketing Regulation for transport

Make sure that passengers with disabilities can also benefit from the announced single digital booking and ticketing regulation on travel by making sure that the platform is accessible following the requirements of the European Accessibility Act and that their specific passenger rights are also guaranteed for the whole trip (provision of assistance, liability for broken and lost mobility equipment, PRM information and complaint handling).

Revision of the Public Procurement Directive

Strengthen the accessibility provisions in the upcoming revision of the Public Procurement Directive, as public authorities do not often comply with article 42 on technical specifications and do not use accessibility as an award and selection criteria. Consider introducing a redress mechanism for citizens to challenge publicly procured products, services and infrastructures when these do not live up to the obligations laid down in the EU Directive.

⁷ [Accessibility measures as implemented by AVMS providers for persons with disabilities](#) (2023). Member states report a number of issues in implementing accessibility measures, including (...) intellectual property challenges (eg. creating audio descriptions without the authorisation of the copyright holder could be seen as an infringement).
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Review State Aid Rules

Revise State Aid Rules to support accessibility adaptations in existing housing stock, and construction of new accessible housing. Ensure that subsidies tackling the housing crisis always take accessibility into consideration.

EU legislation granting the use of State Aid, particularly the [Services of General Economic Interest package](#) (SGEI) on the use of state aid, should increase flexibility for such investments into accessibility and not be restrictive on the amount Member States can dedicate to such investments.

2. Enjoying EU Rights

EDF priorities for the period 2025 to 2030

Flagship initiatives

Flagship 3: Directive for full freedom of movement of persons with disabilities

Introduce a Directive on the shared responsibility of Member States for disability support towards EU citizens moving from one Member State to another for the long term.

The final approach of this Directive still needs to be further discussed in order to find the best solution, but we would strongly advise that the law allows persons with disabilities to retain coverage from one's Member State of origin through "portability" of one's benefits until the moment that the citizen has established residence in a new Member State and has undergone the new disability assessment procedure.

As well as an agreement on a person's Member State of origin continuing to fund their support until they have been assessed and recognised as a person with disabilities in their new Member State of residence, there must also be a mechanism, supported with EU funds, to offset any differences in disability allowances and personal budgets between Member States, and to ensure that whatever a person

receives in financial support is adequate and proportionate to the cost of living wherever they are based.

Finally, the Directive should also put further responsibilities on the new Member State of residence not to allow undue delays in the reassessment of a person's disability. A decision on their status and the recognition of their disability status in the system of the new country of residence should be made within a reasonable timeframe and give them access as soon as possible to the services that are available to them there.

Other actions

Embedding disability in the European Semester to shape the use of EU funds

Make issues faced by persons with disabilities central to the Country Reports and Country Specific Recommendations, with an aim of ensuring the [National and Regional Partnership Plans](#) prioritise investment of EU funds in these areas.

Ensure that organisations of persons with disabilities are consulted in the drafting of the documents within the [Spring Package](#), and in the elaboration of the subsequent national plans.

We call on the Commission to clearly identify challenges faced by persons with disabilities, particularly in areas where the EU does not have competence to legislate such as in inclusive education and social protection, and to request that the Member States address these challenges in their National and Regional Partnership Plans, for the use of EU funding.

Access to higher education and European mobility programmes

Collect data on the number of young persons with disabilities that take part in Erasmus+ mobility programmes and collect this data on a regular basis to observe trends.

Survey young people with disabilities taking part in mobility programmes to understand the barriers they have faced and that they think are most likely to put off other young people with disabilities from taking part in the programmes.

3. Decent quality of life and living independently

EDF proposals for the period 2025 to 2030

3.1. Fostering access to quality and sustainable jobs

Flagship initiatives

Flagship 4: Disability Employment and Skills Guarantee

Establish a Disability Employment and Skills Guarantee, inspired by the successful Youth Guarantee, to provide funding and support to ensure that persons with disabilities have equal access to mainstream education, training and employment opportunities, including self-employment and entrepreneurship. The Guarantee should also offer support in making every training and skills-development programme fully inclusive and accessible.

In order to meet the needs of persons with disabilities, the Disability Employment and Skills Guarantee would need to have some considerable differences with the Youth Guarantee. Notably:

- It should be open to people who are receiving disability allowance and allow them to retain this allowance when in work, training or education. Being the recipient of disability allowance should not result in the person in question not being considered to be a NEET (Not in Education, Employment, or Training) as is currently the case for the Youth Guarantee;
- The age restriction should of course be lifted, as barriers to the open labour market for persons with disabilities are often experienced throughout a person's entire life;

- Extra resources should be on offer, from the funding attached to the Disability Employment Guarantee, to assist in providing reasonable accommodations for the person at work (since in most EU Member States' reimbursement of costs for reasonable accommodation to employers are dependent on the employee having a permanent contract).
- The Guarantee would need to very carefully clarify which types of work settings people can be supported into as part of the scheme. Excluded from the scope of the Guarantee should be sheltered workshops exclusively for persons with disabilities where workers do not have the legal status of employee and are not paid in line with national, regional or sectoral minimum wage requirements. Emphasis should be on placements in the open labour market, or in social enterprises that support people into mainstream forms of employment, focusing on transition.
- For participants taking part in education or training in particular, the Guarantee should ensure access to certification that can attest the skills acquired by participants with disabilities.

In its next Multiannual Financial Framework the EU should increase the budget going towards actions supporting social inclusion, to ensure that inclusion of new social initiatives such as this would not dilute spending elsewhere.

Other actions

A Directive to regulate the use of algorithms for managing, monitoring and recruiting workers

In line with the [suggestion from the Commission that the EU will develop such a legislative proposal](#), as well as the release of the [EU's Quality Jobs Roadmap](#), the EU should commit to this plan and must ensure that this legislation very clearly removes risks of discrimination that candidates and employees with disabilities can face at the hands of Artificial Intelligence algorithms. It must be clear that algorithms used in managing, monitoring and recruitment cannot in any way put persons with disabilities at a disadvantage purely because of their disabilities.

Recommendations to the Member States on compatibility between disability allowance and other forms of income

Develop Recommendations to the Member States on the benefits of enabling persons with disabilities to retain disability allowance regardless of employment, marital status and inheritance, with examples of EU Member States and other countries where disability allowance is not impacted by these factors.

The recommendations should take into account the extra cost of living of persons with disabilities and the impact this has on the need for extra income support alongside earnings from employment and income from other sources.

Study on the extra cost of living of persons with disabilities

Commission a study into the extra cost of living of persons with disabilities. This study can be used to bring to light why disability allowance is a right, why disability allowance schemes must offer adequate financial support, and why it is important to allow persons with disabilities to retain disability allowance when receiving other forms of income.

Study on income and pension gaps for informal carers

Issue a study into the extent to which people in the EU who offer informal support to family members and loved ones with disabilities, particularly women who are more likely to fill such roles, lose out on access to adequate income and pension entitlements later in life.

Use the study to identify Member States and regions where informal carers are given the least support, and the extent of loss to income that can arise when State support is not available.

Further guidance for the Member States on inclusive forms of employment

The Member States should be supported to strengthen practices that help increase meaningful employment of persons with disabilities in the open labour market. Notably, the Commission should consider developing detailed guidance, through consultation with persons with disabilities and their representative organisations, on:

- developing and implementing legal and policy frameworks for **supported employment** of persons with disabilities;
- designing and implementing **disability-specific employment quota systems**, taking into account the evolving needs of the labour market.

3.2. Independent living and inclusion in the community

Flagship initiatives

Flagship 5: EU Package on de-institutionalisation

The package should build on the success of the [EU Guidance on Independent Living and Inclusion in the Community for Persons with Disabilities](#). It should have a particular focus on incentivising Member States to reduce the number of persons with disabilities in institutions and to hold them accountable for their failure to do so in line with the UNCRPD. As has been highlighted in a [recent report by Eurofound](#), overall the number of persons with disabilities in institutions has increased over the past 10 years, noticeably in 13 Member States.

The actions in the package could include:

Regular data-collection and monitoring to measure de-institutionalisation in the Member States

Eurostat, together with the national statistics offices, should collect disaggregated data annually on persons with disabilities in institutions. This should be made available on [Eurostat's Disability Database](#).

With the release of annual data, Eurostat, together with the Disability Unit in DG Justice, should disseminate information on:

- Member States with the highest proportion of persons with disabilities living in institutions
- Member States seeing the greatest rises and decreases in persons with disabilities living in institutions since the previous year

- Member States seeing the greatest rises and decreases in persons with disabilities living in institutions over the past 5 years
- The impact of gender and level of support needs on institutionalisation of persons with disabilities.

These should be shared annually, around the European Days of Persons with Disabilities, to spread awareness of Member States' progress in facilitating the transition away from institutions. The method for monitoring and disseminating the data could take inspiration from the [Americans with Disabilities Act Participation Action Research Consortium \(ADA-PARC\)](#).

Council Decision on deinstitutionalisation

The Commission should propose and the Council should adopt a Council Decision on deinstitutionalisation, in the same way it has done on [guidelines for employment policies](#).

The aim should be for the Council Decision to call all Member States to adopt national de-institutionalisation strategies and set national, time-bound targets for reductions in the number of persons with disabilities in institutions.

Make de-institutionalisation central to the European Semester and delivery of EU funds

Data on persons with disabilities in institutions, the progress being made, and the way to go to reach the target mentioned above, should be systematically included in the Country Reports of the European Semester, and reflected in the Country-Specific Recommendations.

The Commission should then use these to ensure that the Member States include actions to address de-institutionalisation within their National and Regional Partnership Plans, for the use of EU funds between 2028 and 2034.

Promote use of Technical Support Instrument for de-institutionalisation and setting up direct payment systems

Engage with the Member States to encourage them to make use of the EU's Technical Support Instrument for planning the transition away from institutional care.

This should combine technical support on:

- Good practices for providing community-based support and personal assistance to people leaving institutions
- How to inform residents of institutions about their options in the community and accompany them in this transition
- How to budget for the cost of de-institutionalisation, when new forms of community support temporarily exist in parallel with institutions that have not yet been closed
- How to set up direct payment schemes and personal budget mechanisms for persons with disabilities to be able to choose and control the type of support they receive
- How to train and attract people to work in the sector to provide community-based support to persons with disabilities.

Flagship 6: Set rules on accessibility for all EU funding going towards housing

Following the launch of the [European Affordable Housing Plan](#) in December 2025, in which the focus on accessibility is sadly absent, we urge the EU institutions and the Member States to set clear rules on accessibility for all EU funding going towards housing.

The key sources of funding for housing are likely to be the [National and Regional Partnership Plans](#) that Member States must draw up for EU funding between 2028 and 2034, and the use of funding channelled through the [Pan-European Investment Platform for Affordable and Sustainable housing](#), created as part of the European Affordable Housing Plan.

This is key to ensuring that affordable housing does not exclude persons with disabilities or older people, who are already cut off from the vast majority of existing housing stock because of a lack of accessibility.

It should be recalled that the inaccessibility of housing is a key reason for people having to leave their home against their will. Accessible housing is in desperately short supply in Europe and typically imposes far greater costs on tenants and buyers due to its rarity.

Other actions

Guidance to the Member States on good practice for disability assessment

Develop guidance for the Member States on how disability assessment processes can be improved, and take into account [concerns raised by the UN Committee on the Rights of Persons with Disabilities](#).

Gather good practices and, on this basis, establish a checklist of procedures to follow in order to deliver disability assessment that accurately measures and responds to the individual needs of persons with disabilities, including those with invisible and often-under-recognised disabilities.

Map the relative successes of Member States in following a holistic, multidisciplinary and human rights-based approach to disability assessment, that involves the person with disabilities in their own assessment, takes into account their actual needs, and provides the level of support and financial assistance required.

Use EU funds to support the families of persons with disabilities

In the next Multiannual Financial Framework, include in the scope of the European Social Fund the objective of offering greater in-home support to families of persons with disabilities.

Offer, with the help of EU funds, assistance to families of persons with disabilities to enable them to more easily cope with any challenges linked to a loved one's disability, and to know how to offer the support their family member needs.

Study on the impact of the transition to adulthood for young persons with disabilities

The Fundamental Rights Agency should conduct a study on this period of transition and what it means for young persons with disabilities, particularly concerning how disability allowance and support changes during this time and the barriers people face when trying to establish their own inclusion in the community. The study can also focus on the barriers young persons with disabilities face in accessing their sexual and reproductive rights, and how this impacts their experience of transitioning into adulthood.

4. Equal Access and non-discrimination

EDF proposals for the period 2025 to 2030

Flagship initiatives

Flagship 7: Strong actions to end forced sterilisation

EDF calls for the adoption of a series of strong actions to end forced sterilisation, which would include:

- **Criminalisation:** a ban of forced sterilisation in EU law;
- **An action plan to end forced sterilisation**, including public apology, rehabilitation, reparation (including economic reparation), and a guarantee of non-repetition.

After the adoption of the [Directive on Combating Violence Against Women and Domestic Violence](#) which failed to include the criminalisation of forced sterilisation, the European Disability Forum renews its call for EU to urge Member States to:

- Criminalise forced sterilisation with no exception based on disability or legal capacity;
- Enforce measures at EU and Member State levels to prevent forced sterilisation, ensure equal access to sexual and reproductive rights, and ensure access to justice, including reporting, as well as adequate criminal sanctions, and compensation for victims;

- Encourage all EU Member States to ratify the Istanbul Convention on combating violence against women.

Other actions

EU coordinator on ending all forms of violence against women

The Commission should nominate a coordinator on ending all forms of violence against women who will oversee the implementation and monitoring of the Directive on combating violence against women and domestic violence, and the Istanbul Convention. One of the roles of the coordinator should be to assess and address the challenges faced by women with intersecting identities, including women and girls with disabilities.

Recognition of national sign languages as part of the multilingual EU

Take action to ensure that national sign languages are given the legal status of languages, in order to be in line with Article 2 of the UN CRPD, which places sign languages on an equal footing with spoken languages. As a symbolic gesture, the EU should also **establish a European Day of Sign Language**.

Adoption of a Horizontal Equal Treatment Directive

Adopt a Horizontal Equal Treatment Directive that would prohibit disability-based discrimination as required by the CRPD including direct and indirect discrimination, multiple forms of discrimination, discrimination by association, and the failure to provide reasonable accommodation, as well as the failure to provide accessibility when mandated by EU or national legislation.

Action plan on equality and intersectionality and annual Equality conference

Adopt an action plan on equality and intersectionality that will take into account the current and new strategies and plans addressing the barriers and discrimination faced by people with intersectional backgrounds, including disability, age, ethnicity, religion, gender and sexual orientation. The action plan will specifically present

initiatives to address intersectionality in the policy work of the European Commission.

Organise an annual Equality Conference with civil society organisations, equality bodies and policy-makers to discuss progress and challenges in equality and non-discrimination in Europe.

These activities could be coordinated by the Equality Task Force of the Commission. The Task force should increase its public-facing work and become more transparent in its mission and activities.

Awareness-raising campaign on women with disabilities

Develop and conduct an awareness raising campaign on women with disabilities, giving visibility to their rights and their role as active participants of society, including as leaders, mothers, mentors, in various domains. This initiative will help deconstructing the negative and stereotyped vision many people have of women with disabilities of all ages, and with various types of disabilities.

Recommendations on autonomy and supported decision making of persons with disabilities and older persons

Collect and publish good practices related to autonomy and supported decision making of persons with disabilities, leading to the adoption of recommendations on the topic. The recommendations will particularly look at the transition from substituted to supported decision-making and the abolition of substituted decision-making regimes. This initiative will foster the protection of the rights of persons with disabilities and older adults currently deprived of their legal capacity, or who are left without support. It could also help in ensuring that Member States implement the 2000 Hague Convention in a way that is compliant with the UN CRPD. It is required by article 12 of the UN CRPD.

EU study on disability hate speech and hate crime

Conduct a study on how persons with disabilities are affected by hate speech (including online), hate crime and cyberbullying, and the legal framework of Member States in this regard. This should include persons with disabilities in all their diversity,

including less visible disabilities and those living in segregating institutions. This will contribute to other Commission initiatives on combating hate speech and hate crime and the [discussion in the Council on extending EU crimes to hate speech and hate crime](#).

Support representation of persons with disabilities in the media

Use funding from Creative EU to explore the representation of persons with disabilities in the media, particularly through:

- Projects that promote persons with disabilities telling their own stories on screen or via other creative media as actors, podcasters, artists, writers, etc.
- Research on the impact that the presence of persons with disabilities in the media has on public understanding and perceptions of disability.
- Training workshops for young persons with disabilities on how to use media for the purpose of disability advocacy and awareness, and particularly on how to get information across clearly in interviews and during television/radio appearances.

Inclusion of persons with disabilities in migration and asylum policy: Guidelines on applicants with disabilities in asylum procedures

Adopt, through the EU Asylum Agency, guidelines on applicants with disabilities, and enhance existing training tools to add modules on the rights of asylum seekers with disabilities.

Ensure the implementation of the EU migration pact includes the disability perspective and complies with the CRPD and the Charter on Fundamental Rights, including the national implementation plans, and the upcoming five-year European asylum and migration management strategy.

Trainings on access to justice

Organise training sessions and provide guidance to Member States officials and justice professionals on access to justice by persons with disabilities, with a specific

focus on victims of crimes who have a disability, in line with the revised Directives on victims' rights and anti-trafficking, and the Directive on combating violence against women. There should be a specific focus on procedural accommodation as enshrined in the revised Directive on victims' rights, in line with the CRPD. This should also be part of the upcoming strategy on victims' rights and anti-trafficking strategy, expected in 2026.

Promotion and implementation of EC Guidelines on access to healthcare for persons with disabilities

Adopt specific actions to promote and implement the European Commission ['Guidelines on how to increase access and overcome barriers in access to healthcare for persons with disabilities'](#), including by organising peer exchanges with EU Member States, through the Commission's Expert Group on Public Health, and allocating resources for national level pilot projects using the guidelines and training initiatives for health professionals.

Data on mental health

Collect survey data through Eurobarometer on mental health and wellbeing of people throughout the European Union. The survey should also explore how intersectional groups are particularly impacted by mental health problems, and the impact mental health can have on material wellbeing and one's place in society, particularly for young people with disabilities. The survey should be carried out on a regular basis to ensure the monitoring of trends.

The questions presented in the Eurobarometer survey should be designed in collaboration with independent organisations working on mental health.

Data collection on inclusive education

Although the [European Agency on Special Needs and Inclusive Education](#) makes efforts to keep track of and disseminate data on the number of learners with disabilities in mainstream versus segregated education, they point out that getting hold of reliable data is particularly difficult.

We call on Eurostat, together with National Statistics Offices in the EU Member States, to collect data on the number of learners with disabilities in different types of educational setting (mainstream of segregated) on a regular basis, disaggregated by type of disability. This data should then be made publicly available on [Eurostat's Disability Database](#).

FRA Disability Survey

Call on the Fundamental Rights Agency to conduct a Disability Survey, as it has done in relation to other discriminated groups, such as the LGBTI and Roma surveys. Such survey is necessary to have an up-to-date overview of the current issues and human rights violations faced by people with disabilities in the EU.

5. Promoting the rights of persons with disabilities globally

EDF proposals for the period 2025 to 2030

Flagship initiatives

Flagship 8: Disability Action Plan in EU External Action

Adopt a Disability Action Plan in EU External Action, similar to the [Youth Action Plan in External Action](#), to ensure disability inclusion.

A Disability Action Plan could offer a critical framework for European institutions, including EU Delegations and Member States, to adopt a more disability-inclusive approach in their external action activities, encompassing both international cooperation and humanitarian efforts.

The Action Plan should cover five main thematic areas:

1. Respecting and mainstreaming the rights of persons with disabilities
2. Ensuring funding mechanisms and clear monitoring
3. Ensuring full and effective participation and accessibility
4. Developing and implementing fully inclusive policy and programmes

5. Strengthening internal and external disability-inclusive cooperation, coordination and partnership

The outcomes of such a plan would ensure that the rights of persons with disabilities are fully respected and systematically integrated into all EU external action policies and programmes. All EU-funded initiatives for external action would adhere to the principles of the CRPD. Persons with disabilities and their representative organisations would meaningfully participate in all EU external action decision-making processes on an equal basis with others. Their full and measurable inclusion would be guaranteed in all policies, guidance, and implementation of EU external action activities.

Finally, EU institutions, Member States, and partners would collaborate in a consistent and coordinated manner toward disability inclusion, fostering internal synergy in alignment with international standards and frameworks. Ultimately, the EU would position itself as a global leader in disability-inclusive external actions.

Other actions

Support Disability Rights in EU Accession Countries

Enhance support for EU accession countries in implementing the CRPD by:

- Supporting the disability movement in EU accession countries and involving them in dialogues during the preparation of the enlargement reports.
- Offering guidance to accession countries on critical issues such as labour market inclusion, inclusive education, transition from institutional to Community-based support and independent living as well as accessibility of transport and public spaces.
- Supporting national governments and local authorities in effectively using the [EU Instrument for Pre-Accession](#) (IPA) to fund this process and offering access to expertise to accelerate progress in these critical areas.

- Establishing monitoring frameworks to ensure that financial and technical resources are optimally used to advance disability rights and that progress is consistently reported.

Budget for Community-based Support Beyond EU Member States

Ensure the next EU budget fully supports independent living for persons with disabilities and facilitates the transition to community-based support and services in third countries. The rules prohibiting investment in institutions for persons with disabilities should be as stringent for EU funding being spent in third countries as it is for structural investment and cohesion funds used by the EU Member States themselves.

Ensure Disability-inclusive Climate Action

Ensure that disability inclusion is a central component in all EU climate adaptation and mitigation policies, as well as EU-funded projects, including the [European Green Deal](#), the EU Nationally Determined Contributions (NDCs), the EU Climate Adaptation [Strategy](#), the Social Climate Fund, and the Just Transition [Mechanism](#). Additionally, support the active involvement of persons with disabilities as stakeholders in global, regional, and national climate negotiations, such as the Conference of the Parties (COPs) by advocating for official recognition of a disability constituency within the [United Nations Framework Convention on Climate Change \(UNFCCC\)](#).

Lead global efforts in disability-inclusive climate action by promoting both physical accessibility and accessible information and communication channels. Ensure that persons with disabilities participate meaningfully in all climate policy decision-making processes.

Advocate for a “Just Transition” that guarantees persons with disabilities benefit equitably from green economy initiatives, both in Europe and globally. This includes addressing socio-economic impacts, promoting job creation in green sectors, and ensuring accessible training and skills development.

Finally, ensure dedicated budget allocations for disability-inclusive climate action and for the transition to a sustainable, inclusive economy that benefit everyone.

Include Persons with Disabilities in Humanitarian Action

Prepare for future crises by fully implementing existing UN and EU guidelines that address the rights of persons with disabilities, including the [ECHO “Guidance note on the inclusion of persons with disabilities in EU-funded humanitarian aid operations”](#), the [Sendai Framework for Disaster Risk Reduction 2025-2030](#) and the [IASC Guidelines for the Inclusion of Persons with Disabilities in Humanitarian Action 2019](#).

Ensure meaningful and continuous consultation with organisation of persons with disabilities (OPDs) in the design and implementation of humanitarian decision-making processes, civil protection systems, and preparedness strategies. Additionally, involve OPDs in shaping the actions taken by emergency services during crisis situations to ensure that interventions are inclusive, accessible, and effective for persons with disabilities.

Continue Supporting Reconstruction in Ukraine

Organise a [Reconstruction Conference](#) dedicated to ensuring accessibility and inclusion in Ukraine’s rebuilding efforts. The conference should prioritise the use of a Universal Design approach, with the participation of persons with disabilities and their representative organisations (OPDs), ensuring that all infrastructure and services are accessible to everyone.

Align financial and logistical support for reconstruction with the identified gaps and recommendations provided by Ukraine’s disability organisations, ensuring that resources are allocated effectively and inclusively to meet the needs of all communities. Ensure that Ukraine is supported in the transition from institutional to community-based care for children and adults with disabilities and that no EU funding is used to perpetuate segregation of persons with disabilities.

Protect Persons with Disabilities in Situations of Conflict and Fragile States

The inclusion of persons with disabilities in situations of conflict, war, and in fragile states is critical yet often overlooked. These individuals face heightened risks, including physical harm, displacement, and lack of access to essential services and

barriers to mobility and communication. Compounded by societal stigma, they are particularly vulnerable to violence, neglect, and exploitation.

Ensuring the protection and participation of persons with disabilities through bold and sustainable commitments and concrete actions, including allocated funding, will ensure the EU upholds the rights and dignity of these people. Inclusive policies and targeted support, such as accessible infrastructure and specialised care, are necessary to address the unique challenges persons with disabilities face and ensure they are not left behind in stabilisation, recovery and peacebuilding efforts.

Commitments such as the Geneva Conventions, the Additional Protocols, the recent [Pact for the Future](#), and international humanitarian law should define the EU's Response.

6. Efficiently delivering the strategy

EDF proposals for the period 2025 to 2030

Expand representation within the Disability Platform

Open the platform to new members: Invite Member States to bring national organisations of persons with disabilities to participate in discussions of the Disability Platform. Invite EU accession countries to join the Platform. In line with the Commission's Youth Dialogue, the Disability Platform should also have reserved places specifically for young persons with disabilities, to ensure that the perspective of young people is taken into account in a more systematic way.

Analyse the implementation of the actions and flagship initiatives from the first half of the strategy

It is important not only to propose new actions, but to follow up on how well those developed between 2021 and 2024 are being implemented. The Commission should analyse and report publicly on the successful implementation of the key actions and flagship initiatives developed during the first half of the strategy. This should be done with particular attention for the transposition of new EU legislation, such as those supporting the new EU Disability Card and Parking Card.

7. Leading by example

EDF proposals for the period 2025 to 2030

Set quota system for employees with disabilities in the EU institutions

The EU institutions should look into establishing quota systems for the employment of persons with disabilities within their structures. This would better reflect what is done in the public sector in many Member States.

As is the case at Member State level, the quota system should be set at a level that is ambitious, yet feasible. It should also take into account the need for reasonable accommodation in order for the person to be able to perform to the best of their ability and should extend to positions at all levels of seniority.

Improve provision of reasonable accommodation by the European Personnel Recruitment Office (EPSO)

Jobs in the EU institutions still remain largely inaccessible to many persons with disabilities because of the inflexibility of the competition process for recruitment. Applicants with disabilities are sometimes denied reasonable accommodations for the entrance exams and are regularly provided with solutions that do little to help them. It puts them at a disadvantage compared to candidates without disabilities and has no bearing on their working abilities within a job. Since most of the selection is done via digital platforms, accessibility has to be strengthened. The EU institutions must lead by example by increasing the proportion of workers with disabilities among their staff, including in senior positions, and removing barriers during the recruitment process. EPSO must revise its rules regarding which types of reasonable accommodations it allows for candidates with disabilities taking competitions to work in the EU institutions.

Inclusive traineeship programmes in the EU institutions

Review of the approach to including persons with disabilities in the traineeship programmes of all the EU institutions, following the example of [positive action for](#)

[trainees with disabilities used by the Council of the European Union](#). Improve the way reasonable accommodation is provided to trainees with disabilities, and extra grants are attributed to cover additional accommodation or transport costs linked to a person's disability. Offer better guidance to staff in the EU institutions managing trainees with disabilities to ensure they are aware of issues they might face and how to address them in a respectful and professional manner.

Strengthen inclusive education in the European schools

Although progress has been made on taking the situation seriously, the provision of inclusive education in the European schools (the schools for the children of those working within the EU institutions and agencies), parents of children with disabilities still find that their needs are not being met.

The European Union cannot legitimately call on the Member States to respect article 24 of the UN convention, if employees of the EU institutions and agencies themselves are still pushed to remove their children from the European schools and to place them into segregated schools.

It is crucial that the European schools are supported in becoming more inclusive. They must be able to provide learning environments that are welcoming of children with all kinds of differing needs, and to provide learners with the adaptations and support they require to thrive.

8. Awareness, governance and measuring progress

EDF proposals for the period 2025 to 2030

Continue with the monitoring framework for the Strategy

The Commission should continue using a [monitoring framework for the implementation of the Strategy](#), as it has done since it began in 2021. It should be transparent about delays, missed deadlines and any inability to deliver what has been promised in the Strategy.

Enhance the functioning of the EU CRPD Monitoring Framework

Follow up on the study on the functioning of the EU CRPD Monitoring Framework and revise its composition, mandate and resource to ensure its independence, effectiveness and inclusivity, as required by the CRPD and the 2025 Concluding observations on the EU adopted by the CRPD Committee.

Make sure that the EU CRPD monitoring framework has an independently allocated budget which should not be to the detriment of the budget of the framework members.

Establish an annual Disability Rights Forum

Organise an annual Disability Rights Forum, on the model of the 'Work Forum on the implementation of the CRPD' previously organised by the European Commission. The annual Disability Rights Forum would be a 1-day conference focused on technical and thematic discussions on the implementation of the CRPD. It would bring together national and European organisations of persons with disabilities, national CRPD focal points and national CRPD independent monitoring mechanisms and relevant policy makers.

Introduce changes to the Access City Awards

EDF would propose considering the following changes to the way the award operates:

- **Have the winning city of the Access City Award to host the following year's European Days of Persons with Disabilities.**
- **Promote the initiatives that foster meaningful cooperation with residents with disabilities, representative disability organisations and Service Providers.** Although this is part of the assessment criteria, it could become one of the special mention awards.
- **Strengthen the role of the National Juries.** For example, allow for site visits, give sufficient time for consultation, and try to involve diverse stakeholders for a broad perspective on accessibility.

- **Revise the assessment criteria of the juries** to allow for an easier application and assessment process to focus on the key aspects of accessibility.
- **Create a community of practice with winning cities.** This could include yearly meetings to discuss certain topics and keep up progress as well as creating a database of accessible tools and good practices for accessible cities. Non-winning cities could also participate in such structures to learn from their peers.
- **Use the expertise of awarded cities to support EU policies in the urban context.** Topics to address could include Urban Mobility Plans under the Trans-European Transport Network (TEN-T) or the Accessibility of Electric Vehicles Recharging Stations.
- **Strengthen the link with the European Disability Card and the AccessibleEU Resource Centre.** This could include a new category related to the use and promotion of the European Disability Card in the city and a yearly event with the centre on cities as well as a report or a repository of good practices.
- **Open the award to cities coming from EU Accession Countries.** This would allow the possibility for these countries, who one day will be part of the EU, to start working on accessibility, integrate EU accessibility policies and standards and engage with EU cities active in the field.
- **Increase the scope of the award to also recognise the effort of cities in other key fields:** provision of services for persons with disabilities, training on accessibility, public procurement good practices, disaster risk preparedness and smart cities, etc.
- **Revise the size of cities that can participate to allow for better comparability.**

Mainstreaming disability issues into other EU Strategies

As well as taking an intersectional approach within the EU Strategy on the Rights of Persons with Disabilities, it is also essential that other existing, ongoing and foreseen EU strategies and their implementation mainstream the rights and needs of persons with disabilities. It will be particularly important to include the disability perspective in strategies such as the:

- EU Gender Equality Strategy
- EU LGBTIQ+ Equality Strategy
- EU Strategy on the Rights of the Child
- EU Roma Strategic Framework for Equality, Inclusion and Participation
- EU Anti-racism Action Plan
- EU Anti-Poverty Strategy
- EU Civil Society Strategy
- EU Green Deal
- EU Digital Strategy
- EU Strategy on Adaptation to Climate Change
- Consumer Agenda 2030
- Victims' Rights Strategy
- Anti-Trafficking Strategy
- European Asylum and Migration Management Strategy

This will require consulting persons with disabilities and their representative organisations in planning and delivering actions within these strategies.

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