



European Semester 2022 mainstreaming disability equality

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European Semester 2022 mainstreaming disability equality

Mark Priestley

European Disability Expertise (EDE) provides independent scientific support to the Commission's policy Unit responsible for disability issues. It aims to mainstream disability equality in EU policy processes, including implementation of the United Nations Convention on the Rights of Persons with Disabilities.

This synthesis report has been prepared as input for the European Semester.¹

¹ For an introduction to the Semester process, see <https://www.consilium.europa.eu/en/policies/european-semester/how-european-semester-works/>, and in relation to the 2022 European and Recovery and Resilience Facility integrated processes https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester/european-semester-timeline/2022-european-semester-cycle_en.

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1 Contextual analysis of the Semester package

The Semester in 2022 built on the exceptional circumstances of the previous policy cycle, resulting from EU response to the COVID-19 crisis. The scope returned to a broader perspective on economic and employment policy co-ordination but remained closely aligned to implementation of the Recovery and Resilience Facility.² Some of the key features of previous cycles were resumed, although in streamlined form. These include the submission of National Reform Programmes by the Member States, the preparation of Country Reports by Commission staff, and proposals to the Council for country-specific recommendations. The integration of the Sustainable Development Goals (SDGs) into the Semester process also continues.

From a disability perspective, the Semester process should give due regard to mainstreaming disability equality in all of its aspects. Disability concerns and data should be visible at each stage of the policy cycle and their coverage should align, wherever possible, with the European Disability Strategy, with national disability strategies and actions plans, and with implementation of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) in Europe. These are the key challenges addressed in this synthesis report.

The European Semester was established in 2010 as the EU's strategic economic policy co-ordination mechanism. It addresses the public finances of the Member States and includes a strong focus on employment policies as well as a social dimension. The process of open co-ordination was adapted and streamlined in response to EU strategic priorities. Following conclusion of the Lisbon Strategy, the primary driver was the 'Europe 2020' strategy, with a focus on long-term recovery from the financial crisis of 2008. Current policy proceeds in context of the Strategic Agenda 2019-2024,³ and implementation of the European Pillar of Social Rights. Following the COVID-19 crisis, the Semester was adapted to coordinate with the EU's Recovery and Resilience Facility (the Facility) and routine publication of National Reform Programmes, Commission country reports and country-specific recommendations was suspended in 2021.⁴ These resumed in 2022.

The European Pillar of Social Rights has been embedded in the European Semester since 2017. Stakeholders, social partners and civil society adopted the European Pillar of Social Rights Action Plan and committed to 2030 social targets in Porto in May 2021.⁵ The Action Plan was also welcomed in the Porto Social Summit by the EU Heads of State and Government. The European Pillar of Social Rights Action Plan set three new measurable social targets for 2030. The revised Social Scoreboard includes notably an indicator of the disability employment gap.⁶ In the June 2021 EPSCO

² See: https://ec.europa.eu/info/business-economy-euro/recovery-from-coronavirus/recovery-and-resilience-facility_en.

³ European Council, *A New Strategic Agenda 2019-2024*, <https://www.consilium.europa.eu/media/39914/a-new-strategic-agenda-2019-2024.pdf>.

⁴ European Commission, *European Semester 2021 – an exceptional cycle* | European Commission (europa.eu).

⁵ European Commission, *The European Pillar of Social Rights Action Plan*, <https://op.europa.eu/webpub/empl/european-pillar-of-social-rights/en/>.

⁶ Eurostat, *Social Scoreboard of Indicators*, <https://ec.europa.eu/eurostat/web/european-pillar-of-social-rights/indicators/social-scoreboard-indicators>.

Council, the Ministers of Employment and Social Affairs, committed to the implementation of the Pillar Action Plan, and to set national targets that will contribute to the common targets.

In March 2021, the Commission adopted a new Strategy on the Rights of Persons with Disabilities 2021-2030.⁷ This Strategy aims to improve the lives of persons with disabilities in the coming decade, in the EU and beyond. The objectives of this Strategy can only be reached through coordinated action at both national and EU level, with a strong commitment from Member States and regional and local authorities to deliver on the actions proposed by the Commission. The 2022 Semester cycle provides a first opportunity to assess how wider policy co-ordination is aligning with this Strategy.

There have been marked improvements in the extent to which Member States and the EU have mainstreamed disability equality in the Semester process over the past decade.⁸ Annual reporting by the Academic Network of European Disability experts (ANED) helped the Commission to raise the profile of disability data in its Country Reports, which supported EU implementation of the CRPD and helped to increase Member States' attention to disability policies.⁹ An increasing level of disability mainstreaming was evident in the Semester documents leading up to the COVID-19 crisis in 2020 but has been somewhat obscured by the focus on macro-level recovery, and by the social and economic impacts of the war in Ukraine in 2022.

This synthesis report sets the scene for the 2022-2023 Semester cycle, drawing on national reviews carried out in 2021, updates to Member States' disability policies, document packages published during the Autumn and Spring of the 2022 Semester cycle, and data newly available from Eurostat in 2022. It considers past trends and identifies future challenges as a basis for the preparation of new EDE country fiches and Commission input to the 2023 policy cycle.

1.1 An introduction to the 2022 Semester

The 2022 Semester saw a return to more familiar policy co-ordination processes, after the exceptional cycle of the previous year, although not a complete restoration. National Reform Programmes were published for almost all Member States in Spring 2022 (see section 1.6 later), although referring to Country Specific Recommendations (CSRs) issued prior to the COVID-19 pandemic. There were no new CSRs in 2021 for most Member States, other than on the budgetary situation.

The streamlining of the 2021 Semester, in response to the COVID-19 crisis, posed challenges to EU progress for disability mainstreaming. On the one hand, evidence of excess deaths and acute limitations in support services highlighted persons with disabilities as a priority risk group, notably those living in institutions. On the other

⁷ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on 'Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030', COM/2021/101 final.

⁸ Priestley, M. (2012) 'Disability policies and the Open Methods of Co-ordination', in Quinn, G. and Waddington, L. (eds) *European Yearbook of Disability Law*, Volume 3, pp. 7-34.

⁹ Priestley, M. (2020) *Mainstreaming disability equality in the European Semester 2019-20: policy issues and questions*, ANED, Utrecht/Leeds, <https://www.disability-europe.net/downloads/1041-task-eu2020-year-4-synthesis-report>.

hand, attention to crisis response and recovery measures meant that there were fewer opportunities in the Semester process to highlight ongoing disability policy developments in the Member States. This raised some similar concerns to policy cycles following the post-2008 economic crisis, where a strong focus on macro-economic imbalances risked the marginalisation of attention to equality issues in the Semester analyses, including disability equality and gender equality.¹⁰ The restoration of more familiar reporting mechanisms for the 2022 Semester addresses some of these concerns but the intervention of armed conflict in Ukraine, with economic and social impacts on EU Member States, also introduced unexpected challenges in the middle of the cycle.

This is now the third Semester cycle since the unprecedented EU response to the impact of the COVID-19 pandemic in 2020, and the reframing of EU strategic priorities. The current long-term budget (Multiannual Financial Framework, MFF) adopted in December 2020 for the period 2021-2027, together with the NextGenerationEU recovery instrument, amounted to more than EUR 2 trillion.¹¹ The largest pillar of these combined resources supports 'Cohesion, Resilience and Values' among EU Member States. This includes the European Social Fund+ (ESF+) to support youth employment, up- and re-skilling of workers, and poverty reduction, as well as the Recovery and Resilience Facility (RRF) and REACT-EU, the two main programmes under NextGenerationEU.¹²

The budgetary prioritisation decisions made during the 2021 Semester continue to shape once-in-a-generation investments now being implemented in 2022-23. These include major systemic and infrastructure investments of relevance to the inclusion of persons with disabilities (such as new public transport services, digitalisation of government and business sectors, and the reform of public services). Failure to address accessibility and inclusion for persons with disabilities in such investments would be a missed opportunity with lasting impacts. Monitoring the implementation of Member States' Recovery and Resilience Plans, in the context of new National Reform Programmes, is therefore important analysing in the current Semester from a disability perspective.

The following sections evidence the progress of the 2022 Semester to date (November 2021 to May 2022), with a review of disability equality mainstreaming in the Autumn and Spring packages. This includes an assessment of EU level reporting, such as the Annual Sustainable Growth Strategy and Joint Employment Report, and a preliminary review of Member States reporting by the, including the new National Reform Programmes and implementation highlights from their Recovery and Resilience Plans. This overview provides a basis for requesting in-depth country reports from EDE's national experts in 2022, in preparation for Commission input to the next Semester cycle for 2023.

¹⁰ Shakespeare, T., Ndagire, F., & Seketi, Q. E. (2021). Triple jeopardy: disabled people and the COVID-19 pandemic. *Lancet (London, England)*, 397(10282), 1331-1333, [https://doi.org/10.1016/S0140-6736\(21\)00625-5](https://doi.org/10.1016/S0140-6736(21)00625-5).

¹¹ European Union, *NextGenerationEU: Make it Real*, https://europa.eu/next-generation-eu/index_en.

¹² European Commission (2021) *Headings: expenditure categories*, https://ec.europa.eu/info/strategy/eu-budget/long-term-eu-budget/2021-2027/spending/headings_en.

1.2 Challenges identified in the 2021 EDE country fiches

In 2021 the following issues were among those highlighted by EDE country experts:

MS	Labour market	Social policies	Education and skills
AT	<ul style="list-style-type: none"> lack of comprehensive data on the employment situation of persons with disabilities makes it difficult to evaluate the effectiveness of measures in place labour market challenges for persons for people with more severe impairments 	<ul style="list-style-type: none"> continuation of institutionalisation and lack of action plans to address this scope to make more use of the Basic Social Welfare Law need for accessible housing 	<ul style="list-style-type: none"> parallel system segregating / inclusive schools lack of distinct responsibility for children with disabilities large differences in inclusive education between regions
BE	<ul style="list-style-type: none"> division of responsibilities over regions and communities makes it difficult to know where to turn for information and support communication gaps between medical and employment services more attention needed to job retention persistence of some sheltered workshops 	<ul style="list-style-type: none"> the non-take-up of disability benefits and support the alarming increase of people with mental health problems in the social security statistics must be followed up (metropolitan problems, poverty risks, housing problems) the announced lowering of the age at which citizens are entitled to an income replacement allowance and integration allowance from 21 to 18 years old should be closely monitored 	<ul style="list-style-type: none"> policy changes regarding inclusive education require a critical analysis the low level of digital literacy of children and youngsters with disabilities requires close monitoring access to Higher Education is still a huge problem to citizens with disabilities
BG	<ul style="list-style-type: none"> lower employment rate of persons with disabilities than the EU average reliance on EU funded projects for vocational training and employment, but at minimum wages significant public spending on outdated sheltered employment 	<ul style="list-style-type: none"> half of persons with disabilities in Bulgaria are at risk of poverty training of personal assistants and quality assessment for this service are lacking re-institutionalisation of social support due to lack of community-based services 	<ul style="list-style-type: none"> little data about the number of children enrolled in mainstream schools quality inclusive education limited by assessment process and insufficient resources
CY	<ul style="list-style-type: none"> unemployment rates seem to have increased in recent years employment and vocational training schemes need to be reinforced 	<ul style="list-style-type: none"> existing efforts of de-institutionalisation are fragmented actions included in the National Disability Plan, maintain smaller scale institutionalisation greater scrutiny of the implementation of 	<ul style="list-style-type: none"> slow progress in special education reform investments still focused on special schools rather than inclusive education reduction of resources for special education support staff

MS	Labour market	Social policies	Education and skills
	<ul style="list-style-type: none"> • employer awareness and workplace accessibility could be strengthened • lack of employment quota system for the private sector 	<ul style="list-style-type: none"> • supported and independent living projects is needed 	
CZ	<ul style="list-style-type: none"> • participation of persons with disabilities in the open labour market remains unsatisfactory • strengthening disability expertise is needed in public employment services • employment of persons with disabilities in public sector remains limited • segregative employment persists 	<ul style="list-style-type: none"> • older persons with disabilities appear at disproportionate risk of poverty. • despite EU investments in deinstitutionalisation, progress towards community-based services remains unsatisfactory • new investments may risk further institutionalised care 	<ul style="list-style-type: none"> • inequalities in education remain a significant challenge for disability inclusion • there is a lack of disability knowledge and skills among teachers in mainstream schools. • a focus on digital skills requires attention to accessibility
DE	<ul style="list-style-type: none"> • the disability employment gap is wide. • increasing employment segregation in sheltered workshops presents a challenge • the quota system, the obligation to reasonable accommodation and workplace accessibility should be strengthened • broad implementation of the 'Budget for Work' is needed 	<ul style="list-style-type: none"> • the risk of poverty for persons with disabilities of working age is more than double that for other persons • there has been a lack of attention to this in the Semester • demographic ageing trends present a challenge for provision of accessible housing 	<ul style="list-style-type: none"> • segregated and segmented schooling systems remain a barrier to inclusion • significant inequalities in educational qualifications result from this • many young persons with disabilities are not eligible for the budget for vocational training • segregation of early childcare is evident
DK	<ul style="list-style-type: none"> • national data indicates a wide employment gap for people with intellectual impairments and mental health conditions. • reforms on employment support are needed to balance the emphasis on conditionality 	<ul style="list-style-type: none"> • consideration of personalised budgets is needed to promote independence • there are concerns about re-institutionalisation in larger residential facilities • there is inconsistency in transition from provision of support for children and adults with disabilities 	<ul style="list-style-type: none"> • there is a lack of focus on disability in national child-focused policy • new data from the SHILD2020 survey should be assessed in relation to school leaving and higher education
EE	<ul style="list-style-type: none"> • while the range of employment services offered is broad, the numbers of beneficiaries are still relatively low 	<ul style="list-style-type: none"> • unmet needs for medical examination are well above the EU average • access to social benefits for children with disabilities has been 	<ul style="list-style-type: none"> • early school leaving is still high, and tertiary education completion is still low among students with special needs

MS	Labour market	Social policies	Education and skills
	<ul style="list-style-type: none"> very few cases are funded for adjustment and accommodation of the working place continued implementation of the Work Ability Reform, needs to be monitored 	<ul style="list-style-type: none"> limited the terms of the Social Benefits Act roll-out of person-centred coordination model for persons with higher care needs to be monitored some deinstitutionalisation plans have been postponed due to lack of community-based alternatives 	<ul style="list-style-type: none"> segregated learning continues in some school subjects there is a lack of support staff in schools to meet needs
EL	<ul style="list-style-type: none"> the disability employment gap appears to widen discretionary measures for employees in response to COVID-19: special purpose leave for workers with children & vulnerable groups lack of policy measures enacting legislation on reasonable accommodation and accessible environments in employment/ vocational training 	<ul style="list-style-type: none"> no specific reference to social policies and healthcare in the NRP 2020 risks related to lack of access to community-based services during COVID-19 lockdown deinstitutionalisation has ground to a halt 	<ul style="list-style-type: none"> no specific reference to education in the NRP 2020 lack of accessible and inclusive environments in schools and universities; inadequate individualized support for pupils with disabilities in mainstream schools (UN Concluding Observations 2020; Disability Observatory 2019) access to mainstream vocational education/ apprenticeship schemes for students with disabilities needs to be monitored
ES	<ul style="list-style-type: none"> about 60 % of persons with disabilities who are working at the moment, could lose their employment as a result of the health, social and economic crisis triggered by the coronavirus and the temporary nature of the contracts that apply to many of them teleworking opens a path of optimism for the labour market of persons with disabilities policies to strengthen financing and guarantee the viability of third sector entities and companies are needed 	<ul style="list-style-type: none"> aid for personal care and accompaniment at home is scarce in quantity and quality between three and four out of ten persons with disabilities suffer from social exclusion in health in regional legislation, budget items with specific mention of persons with disabilities are few facilitate access to services and health in times of COVID residential alternatives must be more inclusive, normalised and easier to protect against current or future pandemics 	<ul style="list-style-type: none"> percentage of persons with disabilities with tertiary studies. People with intellectual disabilities have the greatest disadvantage reform special education centres into resource centres lacking legislative framework to promote inclusion lack of access to educational technology in the pandemic
FI	<ul style="list-style-type: none"> employment of persons with disabilities is still a big challenge; the Ministry of Labour 	<ul style="list-style-type: none"> SOTE (nation-wide administrative structure) reform includes reform 	<ul style="list-style-type: none"> inclusive education continues to be a problem for children with disabilities

MS	Labour market	Social policies	Education and skills
	<ul style="list-style-type: none"> conducting a study on this support re-employment of those who were unemployed due to pandemic 	<ul style="list-style-type: none"> of the Act on Disability Services wide-spread inequalities in terms of implementation of disability services among municipalities continues to be problematic the impact of COVID-19, several statements made by stakeholders on deteriorated living situations of persons with disabilities the government programme included several activities on the rights of Deaf persons and Sign community 	<ul style="list-style-type: none"> the impact of COVID-19 to children with disabilities is important to investigate, as the distance-learning was difficult for some groups
FR	<ul style="list-style-type: none"> impact of supported employment measures in the light of new economic crisis the link between teleworking and digital accessibility to employment opportunities. National strategy for 2020 may induce a deep change in the labour market dynamic 	<ul style="list-style-type: none"> access to health and welfare services as well as to technical aids impact of the new funding mechanisms for specialist provision and disability support since 2018 have been generalised housing opportunities persons with disabilities have in the light of reforms undertaken 	<ul style="list-style-type: none"> COVID-19 impact on education and support opportunities impact of initiatives taken to support transition from specialist to mainstream schools impact of revamped individual learning account started in November 2019
HR	<ul style="list-style-type: none"> labour market participation of persons with disabilities remains well below the EU average new parliament and new government (from 7/2020), new employment policy employment public incentives (reallocation of budget costs for employment of persons with disabilities during COVID crisis) employment in sheltered workshops (numbers, trends, types of activities, problems) 	<ul style="list-style-type: none"> new parliament and new government (from 7/2020), jurisdictions and priorities new ministries in disability policy policy measures for different groups (different measures for war veterans and other persons) implementation of independent living concept and improvement of services for long term care (limited opportunities for living in community) legal regulation of personal assistance transition of financing of services and assistances from financing based on projects to financing 	<ul style="list-style-type: none"> low of labour market skills among persons with disabilities barriers to the inclusion in on-line education (on all levels) opportunities and barriers for adult students with reform and new regional centres of competence in VET special VET schools for persons with disabilities implementation of teaching assistance scheme

MS	Labour market	Social policies	Education and skills
		<p>based on local, regional or state budget (or other stable financial scheme)</p> <ul style="list-style-type: none"> • lack of evaluation and monitoring of long-term residence care (especially in private institutions) • lack of professional staff in healthcare – generally and regional differences • E-government tools for persons with disabilities (necessary conditions: digital skills, equipment, quality of internet connection) 	
HU	<ul style="list-style-type: none"> • improve active labour market measures aimed at persons with disabilities to increase employment rate and decrease unemployment • improve participation of persons with disabilities in public work schemes • improve participation in transition programs from public work to the primary labour market 	<ul style="list-style-type: none"> • improve community-based care facilities, numbers and quality • decrease deprivation rates of children with disabilities • improvement of the social safety net aimed at persons with disabilities • strengthening primary care services 	<ul style="list-style-type: none"> • improve educational outcomes at all levels for persons with disabilities • elaborate special measures for children with disabilities in the framework of the vocational education and training reform • decrease early school-leaving of children with disabilities
IE	<ul style="list-style-type: none"> • collect and reference disability specific data • address extra cost of disability and barriers to employment • full and effective implementation of the comprehensive employment strategy for persons with disabilities • provide funding supports for education, training and transition to employment 	<ul style="list-style-type: none"> • collect and reference disability specific data • address the poverty and social exclusion of persons with disabilities • progress review, target setting and action plans for implementation of policies 	<ul style="list-style-type: none"> • collect and reference disability specific data • access and affordability of early childhood education and care is a challenge • lack of funding for students with disabilities who are under-represented on part-time courses
IT	<ul style="list-style-type: none"> • law 68/1999 and its lack of implementation • workplace accessibility and reasonable accommodation • disability and discrimination in the workplace: legal framework and case-law 	<ul style="list-style-type: none"> • disability, dignity and minimum income: the right to 'minimo vitale' • the 'citizenship income' (reddito di cittadinanza): some critical points • law 134/2015 (provisions regarding the diagnosis, treatment and qualification of people with autism spectrum disorders): non- 	<ul style="list-style-type: none"> • as pointed out by the Italian constitutional court, support teaching is undersized • as highlighted by ISTAT, access to school and the learning environment for students with disabilities is poor • lack of early childhood education and care

MS	Labour market	Social policies	Education and skills
	<ul style="list-style-type: none"> post-pandemic labour market and persons with disabilities 	<ul style="list-style-type: none"> implementation problems and lack of funding intra-regional disparities regarding the policies on independent living rethinking protocols for emergency screening and building a disability inclusive response to COVID-19 	<ul style="list-style-type: none"> impacts on caregivers' (mainly for women) e-learning accessibility and digital divide
LT	<ul style="list-style-type: none"> low employment level of the persons with disabilities in Lithuania compared with EU average need for personal assistants at work 	<ul style="list-style-type: none"> new type of social services deinstitutionalisation process accessibility of healthcare services risk of poverty or social exclusion 	<ul style="list-style-type: none"> inclusive education remains inadequate accessibility of educational institutions for persons with disabilities
LU	<ul style="list-style-type: none"> participation of persons with disabilities in the labour market following the national plan for smart, sustainable and inclusive growth and the recent reform programmes 	<ul style="list-style-type: none"> access to the health system in times of COVID-19 transition to a new national support system (from RMG to REVIS) exclusion from voting rights, equality in legal matters, etc. 	<ul style="list-style-type: none"> formal abolition of the special education system (education différenciée) in favour of a competence centred approach
LV	<ul style="list-style-type: none"> subsidised employment for persons with disabilities social enterprises and employment of persons with disabilities correct data about employed persons with disabilities 	<ul style="list-style-type: none"> inadequate social security and health care discrimination of persons with disabilities from childhood who are not working poverty risks for persons with disabilities remain high deinstitutionalisation and regional reform 	<ul style="list-style-type: none"> special education after regional reform access to vocational education assessment of possibilities to be employed for persons with disabilities
MT	<ul style="list-style-type: none"> further disaggregation of national labour market statistics the impact of the COVID-19 crisis on the employment of persons with disabilities impact of the extension of the In-work Benefit Scheme re-development of the Ta' Qali Crafts Village - how (if at all) were the needs of persons with disabilities taken into account 	<ul style="list-style-type: none"> data on social security payments benefits (e.g. Wage Supplement) due to the COVID-19 pandemic. data on the rent subsidy introduced by the Housing Authority due to COVID-19 the impact of the increase in benefits (additional assistance for severe disability, carer's allowance, disabled child allowance and non-contributory medical assistance) 	<ul style="list-style-type: none"> skills gap for students with disability, especially non-academic studies government investment threatens to undermine inclusive education the need to involve children with disabilities in decisions affecting them, including individual educational programmes

MS	Labour market	Social policies	Education and skills
		<ul style="list-style-type: none"> government's project of providing a new residential home for adults with disability the impact of initiatives to reduce dependence on social benefits social impact of public health measures due to COVID-19 	
NL	<ul style="list-style-type: none"> unemployment gap between people with and without disabilities stays high persons with disabilities are disproportionately offered short term and flexible contracts self-employed people have difficulty in getting affordable insurance for disability 	<ul style="list-style-type: none"> persons with disabilities face a higher risk of poverty and social exclusion Government does not provide statistics specifically on poverty and exclusion of persons with disabilities 	<ul style="list-style-type: none"> the number of children with disabilities referred to special schools is increasing the number of out of schools stays at around 10 000 preschools are not commonly accessible to children with disabilities few young persons with disabilities gain a formal diploma
PL	<ul style="list-style-type: none"> disability gap in employment remains high low availability of instruments, benefit traps remain unsolved bill on supported employment and its consequences for non-governmental organisations that rely on employment-related projects stagnation of the disability assessment reform ineffectiveness of labour market measures, including limited transfer from project-based to systemic changes lack of transition from education to the open labour market impact of COVID-19 measures and support in maintaining employment during the pandemic and beyond 	<ul style="list-style-type: none"> National Disability Strategy 2020-2030 the consequences of COVID-related restrictions on care provision access to rehabilitation – general access and COVID-related restrictions limited community-based services; Personal Assistance program and access to independent housing insufficient of support for families, decrease in funding for the long-term care programme 'Care services for disabled persons' Reform of the Solidarity Fund insufficient social benefits issues raised by the 2018 protests are not solved stagnation of deinstitutionalisation process during COVID-19 2020 election and accessibility 	<ul style="list-style-type: none"> no substantial change with regards to the education of children with moderate and severe disabilities in segregated settings COVID-related issues in education (e-learning, drop out, home education) digital exclusion during the pandemic rural-urban divide in education development of the higher education accessibility programmes Right to Polish Sign Language bilingual education as universities progress, vocational training lags behind

MS	Labour market	Social policies	Education and skills
PT	<ul style="list-style-type: none"> increase in persons with disabilities registered as accessed jobs and decrease in those registered as unemployed risk of reversal in the COVID-19 crisis the need to reorient the vocational training opportunities for persons with disabilities, adapting to the labour market (e.g. many persons with disabilities are being trained for the hotel and restaurant sectors, which faces a major crisis) investment in the qualification of persons with disabilities in terms of digital skills, even more important due to teleworking and fundamental to maintaining jobs 	<ul style="list-style-type: none"> the number of beneficiaries of the disability social benefit is increasing (PSI) the Statute of the Informal Caregiver was approved in 2019 (Law 100/2019) and came into force in 2020 extraordinary support measures created for the social sector due to COVID-19 suspension of medical examinations leading to disability certification the new national scheme for independent living (MAVI-Movimento de Apoio à Vida Independente) 	<ul style="list-style-type: none"> implementation of the new legislation on inclusive education adequacy of distance learning modalities for students with disabilities development of digital competences must include students with disabilities
RO	<ul style="list-style-type: none"> discrimination remains pervasive on the labour market legal instruments and policies have partially failed to achieve objectives, with access to the labour market remaining limited 	<ul style="list-style-type: none"> reforms to promote support but levels of poverty and social exclusion still very high persons with disabilities face significant problems in accessing general and special healthcare services the segregation of children and adults with disabilities in institutions continues; while some steps forwards have been made, more progress is needed 	<ul style="list-style-type: none"> the rate of children and young adults segregated in special schools remains very high shortages in teachers and specialised professionals, particularly in the public system persons with disabilities are more prone to early school leaving and have lower participation rates in upper secondary and higher education
SE	<ul style="list-style-type: none"> active labour market measures – situation for persons with disabilities unemployment risk due to COVID-19 and the economic situation in Sweden– situation for persons with disabilities 	<ul style="list-style-type: none"> measures for persons on sick leave and for young persons with activity compensation risks due to COVID-19 health risk in special accommodation and personal assistance 	<ul style="list-style-type: none"> investment in education at universities and colleges, polytechnics, and folk high schools– situation for persons with disabilities
SI	<ul style="list-style-type: none"> the labour market is inaccessible, especially for people with long-term mental health 	<ul style="list-style-type: none"> the Personal Assistance Act 2019 and its implementation the inaccessibility of the healthcare for disabled 	<ul style="list-style-type: none"> need to replace parallel educational system and institutionalisation of children with disabilities with deinstitutionalisation

MS	Labour market	Social policies	Education and skills
	conditions and intellectual disabilities <ul style="list-style-type: none"> the awareness of the employers has not improved, and the economic crises continues due to the pandemic 	and elders during the crisis	and mainstream education
SK	<ul style="list-style-type: none"> measures to support employment remain focused on subsidies for employers rather than individualised services for jobseekers public employment services lack capacities to support the most disadvantaged the biggest challenge is a high rate of economic inactivity impact of COVID-19 crisis 	<ul style="list-style-type: none"> status of people with intellectual disabilities who are deprived from legal capacity or have limited legal capacity remains challenging process of defining new national priorities for social services until 2030 is relevant to deinstitutionalisation the Ministry of Labour plans to modify the monthly amount of personal care assistance, and home care allowance, with an aim to decrease the gap between them 	<ul style="list-style-type: none"> participation of children with disabilities in early childhood and pre-primary education is low in 2020, two ESIF funded national projects were approved to support inclusive teams at mainstream schools

1.3 Annual Growth Strategy

The Annual Sustainable Growth Strategy 2022 (ASGS) was published in November 2021.¹³ This framed the Semester in context of Europe's response and COVID-19 pandemic, the prospects for return to growth, and the foundations for recovery and resilience. However, it underlined the four strategic principles previously established for development post-2020 – Environmental sustainability (Green transition), Productivity (notably Digital transition), Fairness and Macroeconomic stability.

The ASGS mentioned persons with disabilities only once, in relation to labour market policies, acknowledging that:

Long-standing challenges in relation to an ageing workforce and labour market participation of women and persons with disabilities should be addressed too. (p. 10)

Nevertheless, many of the general policy priorities identified in the ASGS are highly relevant to meeting these challenges, as well as wider social challenges for persons with disabilities. The Survey highlights, for example, hiring and transition incentives, upskilling and reskilling, and enhanced support by public employment services. There are examples of measures to support the labour market participation of 'disadvantaged groups', among which persons with disabilities are overrepresented. There are

¹³ European Commission (2021) *Annual Sustainable Growth Strategy 2022*, COM(2021) 740 final, https://ec.europa.eu/info/system/files/economy-finance/2022_european_semester_annual_sustainable_growth_survey.pdf.

examples of Member State plans to invest in access to health care, social care, and social housing, for example. All of these policy areas will benefit from a disability equality perspective.

Continuing the pattern of the 2021 Semester, the ASGS emphasised the role of the Recovery and Resilience Facility as an embedded investment mechanism. The Recovery and Resilience Plans of the Member States (RRPs) thus remain an important reference point for assessing the extent and relevance of disability equality mainstreaming in the Semester process. These plans are assessed in the annual EDE country reports, from a disability perspective (most recently in 2021). They commit more than EUR 400 billion in EU grants and loans to the Member States.

As noted previously, the rapid deployment of such a large financial investment poses both opportunities and risks for persons with disabilities. Funding must be well targeted to stimulate recovery, yet it must be fair and inclusive in its impact. If investments on this scale fail address disability equality, including accessibility, there is a risk compounding the exclusion of persons with disabilities at a structural level for years to come. Where RRP's promise systemic investments (e.g. in major digitisation of government services or transport infrastructure) then it is vital that accessibility standards are met as a condition of EU funding.

The Commission's Technical Support Instrument (TSI) will be important in the implementation phase. It aims to provide 'tailor-made technical expertise to EU Member States to design and implement reforms'.¹⁴ Technical assistance input is driven by requests from the Member States and may be provided by in-house expertise from the Commission, from experts, international organisations or private companies. It is important that such available expertise includes an awareness of disability equality principles and accessibility standards. Thirteen Flagship technical support projects were identified in 2021. Only one of these referred directly to persons with disabilities, among groups of children 'experiencing specific disadvantages'.¹⁵ For example, there was no specific reference to the inclusion of persons with disabilities or accessibility in Flagship projects on digital government services, digital skills for health workforces, digital tourism.

There is a specific Flagship on 'Gender mainstreaming in public policy and budget processes'.¹⁶ Its description provides a useful template for replication in the disability equality field:

This flagship project targets the Member States wishing to understand ways of taking into account the gender impacts of policies and budgeting, or to address related gaps. It offers technical support to analyse policies and budgeting from the point of view of gender mainstreaming, helping to make sure that all citizens, regardless of gender, are able to fully participate and contribute to a fair society.

¹⁴ European Commission (2022) *Technical Support Instrument (TSI)*, https://ec.europa.eu/info/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en.

¹⁵ European Commission (2021) *Implementation of the European Child Guarantee in EU Member States* https://ec.europa.eu/info/sites/default/files/b4_-_child_guarantee.pdf.

¹⁶ European Commission (2021) *Gender mainstreaming in public policy and budget processes*, https://ec.europa.eu/info/sites/default/files/b1_-_gender_mainstreaming.pdf.

Gender perspective/impact can be mainstreamed in all relevant policy areas and reflected in budgeting. The flagship technical support project will provide capacity development on latest trends/methodologies/tools for mainstreaming. The project will also help Member States for peer learning/exchanges per country and while improving their targeted approaches in chosen sectors, policy fields or regions.

For example, it supports technical projects on 'Reducing employment gender gap in the Hungarian labour market' and 'Strengthening the government capacity for gender-sensitive and inclusive recovery in Czech Republic'. Such examples could be easily transposed to adopt a similar perspective on disability equality mainstreaming.

EDE's Semester reporting focuses mainly on measures by the Member States in the labour market, social policies, and education and training. The ASGS offers some general pointers about areas of interest for this analysis, including:

- access to the job market;
- labour market segmentation;
- active labour market policies;
- inclusiveness of education systems;
- quality of education and training;
- educational outcomes;
- socio-economic background;
- social protection measures.

Across these areas the EDE country fiches, evidence how persons with disabilities are disproportionately disadvantaged in the Member States and where they might be further supported towards more equal opportunity and participation. The Semester also presents possibilities to address social policies beyond income protection (notably in relation to long-term care and health care) and accessibility. From a disability perspective, additional consideration should be given to:

- deinstitutionalisation;
- support for independent community living;
- equal access to health care;
- accessibility in structural investments.

1.4 Employment Guidelines and Report

Within the Autumn package, laying the groundwork for the new Semester, the proposal for a Joint Employment Report (JER) provides a key point of reference. It also provides important evidence of the EU's progress in disability equality mainstreaming. As a marker of progress, the number of references in the JER to the situation of persons with disabilities, or to disability policies, has increased year on year for a decade. The JER for the 2022 Semester contained more than one hundred disability references in the text (plus the addition of supporting data and indicators).

The JER reinforces the relevance of the Social Pillar and the revised Social Scoreboard in the Semester process. It reiterated the relevance of the 2021 European

Pillar of Social Rights Action Plan¹⁷ and policy guidance arising from the 2021 Porto Social Summit.¹⁸ The joint declaration from that summit referred directly to disability, committing all parties to:

Develop public policies that, at the appropriate level, strengthen social cohesion, fight against all forms of discrimination, including in the world of work, and promote equal opportunities for all, particularly addressing children at risk of poverty, the elderly, people with disabilities, people with a migration background, disadvantaged and minority groups and the homeless;¹⁹

The summit covered the three main areas of thematic focus addressed in EDE's Semester reporting – work and employment, welfare state and social protection, skills and innovation (i.e. the labour market, social policies and health care, education and skills). The Action Plan included the relevance of Social Pillar principle 17 and the cross-cutting concepts of non-discrimination and equal opportunities for all.

The introduction of a 'disability employment gap' indicator into the social protection and inclusion dimension of the revised Scoreboard is a significant achievement for disability equality mainstreaming (initially adapting the EDE methodology, based on EU-SILC data, but moving to the use of EU-LFS data as this becomes available later in 2022). This measure was exploited in the 2022 JER Proposal to rate the performance of Member States. These initial ratings, based on provisional data, were amended in the final version of the 2022 JER approved by Council in March 2022.²⁰ In the final version, the disability employment gap was flagged as a critical situation in Belgium, Bulgaria, Germany and Croatia, and 'to watch' in Hungary, Malta, Poland, Romania and Sweden. Initial indicators were not provided for Ireland, Italy and Latvia in the Proposal. In the final version, Ireland was added as 'Weak but improving' (but not Italy and Latvia). The JER acknowledges the wide employment gap experienced by persons with disabilities in the EU and the 'considerable potential' to increase their employment.

In relation to the impact of the COVID-19 crisis, the JER Proposal noted that:

Confinement measures have had a disproportionate impact on persons with disabilities, for instance, notably in terms of access to healthcare, education and other on-line support services, also aggravating pre-existing limitations in access to employment' (p. 27).

These impacts were examined in some depth in thematic reports produced by EDE in 2021, and by the Commission's annual review of Employment and Social Developments in Europe 2021, which included a summary section devoted to this.²¹

¹⁷ European Pillar of Social Rights Action Plan, <https://ec.europa.eu/social/BlobServlet?docId=23696>.

¹⁸ Porto Social Summit, 7 May 2021, <https://www.consilium.europa.eu/en/meetings/european-council/2021/05/07/social-summit/>.

¹⁹ *Porto Social Commitment*, 7 May 2021, <https://www.2021portugal.eu/en/porto-social-summit/porto-social-commitment>.

²⁰ European Commission (2021) *Joint Employment Report 2022: As adopted by the Council on 14 March 2022*, <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8476>.

²¹ European Commission (2021) *Employment and Social Developments in Europe 2021* (pages 86-89) <https://ec.europa.eu/social/BlobServlet?docId=24223&langId=en>.

The Council's 2021 Decision on the Employment Guidelines emphasised the importance of tackling discrimination and acknowledged the employment potential of persons with disabilities explicitly.²²

(10) Discrimination in all its forms should be tackled, gender equality ensured and youth employment supported. Access and opportunities for all should be ensured and poverty and social exclusion, including that of children, should be reduced, in particular by ensuring an effective functioning of labour markets and adequate and inclusive social protection systems, and by removing barriers to education, training and labour-market participation, including through investments in early childhood education and care and in digital skills. Timely and equal access to affordable long-term care and healthcare services, including prevention and healthcare promotion, are particularly relevant, in light of the COVID-19 crisis and in a context of ageing societies. The potential of people with disabilities to contribute to economic growth and social development should be further realised. As new economic and business models take hold in Union workplaces, employment relationships are also changing. Member States should ensure that employment relationships stemming from new forms of work maintain and strengthen Europe's social model.

In its practical effect, the Decision carried forward the previous guidelines on employment policies and these are of high relevance from a disability perspective (see Annex to Council Decision (EU) 2020/1512).²³

Member States should support an adapted work environment for people with disabilities, including through targeted financial support and services that enable them to participate in the labour market and in society.

And...

Member States should promote inclusive labour markets, open to all, by putting in place effective measures to fight all forms of discrimination and promote equal opportunities for all, and in particular for groups that are under-represented in the labour market, with due attention to the regional and territorial dimension. They should ensure equal treatment regarding employment, social protection, health and long-term care, education and access to goods and services, regardless of gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation.

And...

For those in need or in a vulnerable situation, Member States should ensure access to adequate social housing or housing assistance and address energy poverty. The specific needs of people with disabilities, including accessibility, should be taken into account in relation to those services.

²² Council Decision (EU) 2021/1868 of 15 October 2021 on guidelines for the employment policies of the Member States, <https://eur-lex.europa.eu/eli/dec/2021/1868/>.

²³ Council Decision (EU) 2020/1512 of 13 October 2020 on guidelines for the employment policies of the Member States OJ L 344 19.10.2020, pp. 22-28, <http://data.europa.eu/eli/dec/2020/1512/oj>.

In the JER, Guideline 6 on Enhancing labour supply and improving access to employment, skills and competences is linked with Social Pillar principle 17 on inclusion of persons with disabilities. It observes, for example, the need for assistive technologies in context of learning digital skills, and the impact of discrimination on school retention rates. In particular, it highlights the labour market challenges facing young persons with disabilities ‘as a result of higher early school leaving and lower levels of tertiary educational attainment’, and the mitigating effect of higher education on the disability employment gap, citing data provided by EDE (p. 67).

Persons with disabilities are among the population groups most likely to be targeted by specific employment support measures or arrangements during the COVID-19 crisis (in at least 11 Member States, p. 56). This is in addition to the widespread use of tailor-made active labour market policies targeting this group under normal circumstances, which is advocated also in the JER as an appropriate approach to inclusion. A key policy question arises, therefore, about the most appropriate balance between generic and targeted employment measures in the Member States, and about the role of public employment services in facilitating this.

With the introduction of a headline indicator for the disability employment gap, this measure was given specific attention in the JER for the first time and emphasising that this shows ‘There is considerable potential for stronger labour market participation among persons with disabilities’ (p. 88). It underlines the wide variation among Member States (which is analysed later) and the aggravating effect of the COVID-19 pandemic, and concludes that there is ‘an urgent need for policy action in this area’ (p. 89). Policy measures to promote the employment of persons with disabilities in the Member States were also highlighted (p. 98).

The Strategy for the Rights of Persons with Disabilities 2021-2030 (summarised later, in chapter 2) identified employment as a key area of action. In this context, the Commission committed to present in 2022, a package to improve labour market outcomes of persons with disabilities, which would be very relevant to the Semester.

Guideline 8 maintains the established principle of ‘Promoting equal opportunities for all, fostering social inclusion and fighting poverty’ and refers to disability, among other grounds, in ensuring ‘equal treatment regarding employment, social protection, health and long-term care, education and access to goods and services’.

The key indicators suggest that household incomes, and the proportion of people at risk of poverty or social exclusion (AROPE), remained relatively stable overall during the initial COVID-19 crisis in 2020. However, it will be important to consider delayed socio-economic impacts, as well as the more recent impact of the war in Ukraine, for which macro level indications may not yet be available. The JER also observes that the impact of social transfers began to diverge just before the crisis’ (p. 17).

The JER highlights Eurostat data showing that ‘Persons with disabilities, especially women and those of working age, were much more likely to be AROPE in 2020’ (p. 139). These rates, and the disparities with the general population, vary markedly among the Member States (the headline rate for working age people is strongly linked to lack of employment). The JER points to aspects of poverty, including energy poverty, that may have a disproportionate impact on persons with disabilities, but

which are not disaggregated in this way. Income inequality is a key concern overall, and there is potential to examine this from a disability perspective (e.g. in terms of financial poverty or in-work-poverty gaps). The impact of social protection measures on poverty risk is also very variable and this is an important factor to analyse from a disability equality perspective. These various challenges are examined in more detail later.

The JER also notes specific measures to review and revise disability benefits and services in the Member States (p. 153). Numerous examples of this type are available in the EDE country fiches. A further issue raised in the JER is uneven access to health care, for example in terms of unmet needs for medical care (p. 150). This measure is also capable of disaggregation from a disability perspective, and examined in the EDE country fiches.

In summary, the updated headline targets for the EU level are to that, by 2030:

- At least 78 % of the population aged 20 to 64 should be in employment
- At least 60 % of adults (25-64) should participate in training every year
- The number of people at risk of poverty or social exclusion should be reduced by at least 15 million

It is a significant achievement for disability equality mainstreaming that the Revised Social Scoreboard now contains a specific indicator for the disability employment gap, with supporting data that is increasingly capable for breakdown by disability status where relevant for complementary analysis. This is a welcome in the long-term development of disability equality indicators by the Commission and Eurostat over the past decade.²⁴ The EDE country fiches contain statistical annexes consistent with the methodology of the former EU2020 headline indicators, based on the EDE statistical reports. A situational analysis is provided later in this synthesis report in relation to selected questions and challenges arising from the employment and poverty data.²⁵

1.5 The Spring package

Each year, the EDE country fiches provide an assessment of disability issues arising from the Spring plans submitted by the Member States, and from the Commission's responses to them. These reports are prepared by national experts in the EDE network, based on their analyses of the information currently available. As outlined earlier, the process of the Semester was amended in 2021, with streamlined reporting and a greater emphasis on the integration of Recovery and Resilience Plans (RRPs). In 2022 there has been a return to the publication of National Reform Programmes (NRPs), Country Reports prepared by the Commission, and Country Specific Recommendations (published in May 2022).

²⁴ Priestley, M., & Grammenos, S. (2021). How useful are equality indicators? The expressive function of 'stat imperfecta' in disability rights advocacy. *Evidence & Policy: A Journal of Research, Debate and Practice*. 17(2):209-226, <https://doi.org/10.1332/174426421X16141001670976>.

²⁵ Corresponding data on adult participation in training is not yet available for analysis but some related questions and challenges, concerning early school leaving and tertiary educational completion, are addressed in previous ANED and EDE reports.

Over the decade of the previous EU strategy period, which coincided also with EU implementation of the UN CRPD, there was increasing recognition of the situation of persons with disabilities in the Semester document packages. By 2019, all 28 of the Commission's Semester country reports raised disability issues, twice as many as in 2012. The number of Country-Specific Recommendation fiches referring to disability also increased from three in 2012 to 18 in 2019. As a result, visibility in the EU's high-level Joint Employment Report (JEP) also rose, from just seven references to disability in 2013 to 57 in 2019 (increasing each year). This encouraging trend has continued in the current period, with 71 references to disability in the 2020 JEP, 85 in the 2021 report and more than 100 in the 2022 report. Considering the considerable preoccupations with macro budgetary challenges and COVID-19, outlined earlier, this level of sustained visibility should be considered a success for disability equality mainstreaming. It also sets a precedent for achieving similar visibility in the next cycle.

The Commission Communication on the 2022 Spring Package included only two references to disability. It underlined the importance of increasing the labour market participation of persons with disabilities (along with other marginalised groups) and acknowledges the disproportionate impact of the COVID-19 crisis on such groups.²⁶

1.6 Preview of the 2022 National Reform Programmes (NRPs)

NRPs were published in the 2022 Spring Package for 25 Member States, many more than in 2021 (only The Netherlands was not yet published at the time of writing). These documents provide a key reference point for the Semester analysis by EDE's country experts during 2022. Not all the NRPs were available in the working language of the EDE project (English) but all were previewed for the inclusion of key search terms relating to disability, to highlight potential issues for further investigation in this year's country reports.

There are also surprising omissions. For example, Annex 4 to Croatia's NRP (Report on the implementation of the European Pillar of Social Rights) includes no information in relation to Principle 17 (Inclusion of people with disabilities), despite these issues being quite well integrated in the main text of the NRP. Slovakia's NRP does not mention the National Programme on Improving the living conditions of persons with disabilities for 2021-2030 or make links to relevant disability policies where these could be easily transposed. Similarly, Slovenia's NRP does not mention its new Action Programme for Persons with Disabilities 2022-2030, and Spain's NRP does not refer to its Disability Strategy 2022-2030. Some of these links to national disability strategies and action plans are observed here but explored in more detail later (see chapter 3.2).

The measures identified in direct reference to disability search terms in the text of the 2022 NRPs and annexes are summarised in Table 1 below, as a basis for further analysis in the EDE country reports (who will also assess other relevant issues).

²⁶ European Commission (2022) 2022 European Semester – Spring Package, COM(2022) 600 final, https://ec.europa.eu/info/system/files/2022_european_semester_spring_package_communication_en.pdf.

Table 1: Text references to disability policies in the 2022 NRPs

MS	National Reform Programme	Text references	Key points of relevance to disability
AT	National language	16 references to hinder...	National Action Plan on Disability 2022–2030 measures to cushion the effects of the COVID-19 Family allowance following school graduation equal opportunities in education Raise the levels of basic skills for disadvantaged groups Education-fit programme (based on The Act on the Employment of People with Disabilities)
BE	English	22 references to disab...	2021-2024 disability action plan (Actieplan handicap / Plan d'action handicap) From 2022, the minimum benefit will be granted from the first day of the fourth month of incapacity for work From 2022 onwards, coordinators will be in charge of providing quick and active support to citizens who have been declared unfit for work An online calculation tool is being developed that allows people on sickness or disability benefits to estimate the impact of working on their net family income The Brussels Region will develop a new legal framework for a specific premium scheme to support employers in the recruitment of jobseekers with disabilities Higher education inclusion of persons with disabilities Integration allowance and the income-substituting allowance for persons with disabilities are being increased
BG	English	33 references to disab...	Implementation of the National Programme for Accessible Housing and Personal Mobility, according to art. 56, para. 1 of the Law on People with Disabilities access to healthcare Increased amount of tax relief for children and children with disabilities Early intervention services for children with disabilities Online training of adults in IT skills Improving access to education and employment for persons with disabilities by providing opportunities to build an accessible environment Financial support to compensate for the costs associated with overcoming the difficulties caused by the type and degree of disability Ensuring free access of persons with disabilities and special educational needs (SEN) to public buildings intended for education Opening up new social services in the community for children and families, elderly and persons with disabilities and eliminating the institutional model of care
CY	English	32 references to disab...	National Disability Action Plan for 2021-2023 Establishment of home structures for persons with disabilities and people in need of long-term care

MS	National Reform Programme	Text references	Key points of relevance to disability
			<p>Upgrading of the System for Disability Assessment</p> <p>Expansion of the Network for Supported Living Homes</p> <p>Centre for Family Intervention and Support for Autism</p> <p>Implementation of Sustainable Urban Mobility Projects (SUMP) and accessibility measures</p> <p>Promoting energy efficiency and tackling energy poverty in households with persons with disabilities</p> <p>Subsidy Scheme for the Employment of unemployed persons with disabilities</p> <p>Adapted facilities and educational materials for the specific needs of children with special educational needs and disabilities</p> <p>Day care Centres for children with disabilities</p> <p>Special Leave Scheme for Parents working in the Private Sector for the Care of their Children less than 15 Years of Age or children with disabilities</p>
CZ	National language	19 references to postižen... (not all disability related)	<p>National Plan for the Promotion of Equal Opportunities for People with Disabilities 2021-2025</p> <p>social enterprises as an alternative to sheltered employment</p> <p>Minimum income</p> <p>Special educational program for municipal and city authorities to communicate with persons with disabilities, foreign born people and the elderly</p> <p>Modernisation of infrastructure – including homes for older and persons with disabilities and sheltered housing</p> <p>Ministry of Health making information accessible to people with sensory disabilities</p> <p>Ministry of Regional Development - resources for the acquisition of a barrier-free entrance and lift in houses that are not equipped with it</p>
DE	National language	18 references to behinder	<p>Some states and municipalities promote certain special areas of housing construction</p> <p>Improve employment opportunities</p> <p>federal program for accessibility (mobility, housing, health and digital)</p> <p>Establishment of single points of contact for employers (§ 185a SGB IX)</p> <p>Law to strengthen the participation of persons with disabilities</p> <p>Implementation of EU Accessibility Act</p> <p>Regulation of access for people accompanied by assistance dogs</p> <p>Pilot project to strengthen rehabilitation</p>
DK	English	1 reference	No specific detail on disability policies in the NRP, apart from a general statement
EE	English	4 references to disab... (but only to data)	<p>No specific detail on disability policies in the NRP but some in annex</p> <p>Reform of the support system for children with Special needs to provide faster, more effective, and more comprehensive care</p> <p>Amendments to the Social Welfare Act to create a more uniform basis for identifying the need for support</p>

MS	National Reform Programme	Text references	Key points of relevance to disability
			Media Services Act 2022 – providers required to prepare accessibility action plans to improve access for persons with disabilities
EL	English	14 references to disab...	Adoption of new disability plan Program – accessibility and support infrastructure for people with mobility and sensory impairments to finance small and large scale adaptations in public and private buildings Integration of specific categories of persons (including persons with disabilities and their close relatives) into employment through quota recruitment DYPA and UNICEF project to support youth at risk for better employment opportunities digital tools for students with disabilities Digital Transformation of the social support system – national portal of disability benefits Establishment of the disability card
ES	National language	10 references to discapac...	Law 8/2021, of June 2 reforms civil and procedural legislation to support persons with disabilities in the exercise of their legal capacity Royal Decree 368/2021, of May 25, on positive action measures to promote access to employment for people with limited intellectual capacity Law 6/2022, of March 31, modifying the Consolidated Text of the General Law on the rights of persons with disabilities and their social inclusion Housing measures targeted to persons with disabilities new model of training services aimed at persons with disabilities in Castilla-La Mancha Catalonia – Pact for the rights of persons with disabilities Basque Country – labour integration of persons with disabilities in special employment centres Social entrepreneurship
FI	English	20 references to disab...	National action plan, Right to social inclusion and equality 2020–2023 Implementation of UNCRPD is identified as a main measure (p84) under Equal Opportunities A youth council, senior council and a disability council to be appointed in each wellbeing services county Employment possibilities for the partially disabled enhanced Extension of the work ability programme and the IPS – Invest and Coach Mental health and work ability
FR	National language	22 references to handicap... (and 45 in annex 1)	Support for employers for the hiring of workers with disabilities (AMEETH) Completed creation of a fifth branch of social security targeting older and persons with disabilities Youth Engagement Contract – aimed at young people aged 16-29 if they are recognized as disabled workers, are not students, not undergoing

MS	National Reform Programme	Text references	Key points of relevance to disability
			<p>training and who encounter difficulties in accessing long-term employment.</p> <p>Inflation indemnity – included adults with disabilities</p> <p>Improving access to schooling for students with disabilities</p> <p>Better finance care for seniors and persons with disabilities and contribute to improving the quality and fairness of care</p>
HR	English	44 references to disab...	<p>National Plan for Equalization of Opportunities for Persons with Disabilities 2021-2027</p> <p>Action Plan for Equalisation of Opportunities for Persons with Disabilities 2021-2024</p> <p>programme on Improving the Access of Vulnerable Groups to the Labour Market in the Tourism and Hospitality Sector II</p> <p>consolidating benefits for persons at risk of poverty and persons with disabilities</p> <p>Deinstitutionalisation and transformation of social welfare institutions (21 projects)</p> <p>Support for the Ongoing Process of the Deinstitutionalisation and Transformation of Social Welfare Homes for Persons with Disabilities</p> <p>Improving Infrastructure for Providing Social Services in the Community for Persons with Disabilities as Support for the Deinstitutionalization Process - Phase I</p> <p>Central Health Information System (CEZIH)</p> <p>digital accessibility</p> <p>ESF+ funds will enable investments in awareness-raising activities among employees</p>
HU	National language	3 references to fogyatékos...	<p>Replacement social institutions with subsidized housing and surrounding services</p> <p>Supporting the independent living of persons with disabilities and psychiatric patients</p> <p>Child care allowance increased to minimum wage level</p> <p>Network of traveling (peripatetic) special education teachers</p>
IE	English	21 references to disab...	<p>National Disability Inclusion Strategy and Comprehensive Employment Strategy for People with Disabilities</p> <p>National Housing Strategy for Disabled People 2022-2027</p> <p>Pathways to Work Strategy</p> <p>Roadmap for Social Inclusion seeks to increase the employment rate of people with disabilities</p> <p>Budgets 2021 and 2022 include measures to support persons with disabilities</p> <p>establishment of a Disability Participation and Consultation Network</p> <p>Cost of Disability Report (December 2021)</p>
IT	English	15 references to disab...	<p>Framework Law on Disability (addressed in the RRP)</p> <p>Financed from new 'Disability and non self-sufficient fund'</p>

MS	National Reform Programme	Text references	Key points of relevance to disability
			<p>Strengthening and qualification of the offer of social services by the local areas,</p> <p>simplification of access to social and health services,</p> <p>Revision of the procedures for assessing disabilities,</p> <p>Promotion of independent living projects and</p> <p>Promotion multidimensional evaluation units on the territories, able to define individual and personalized projects.</p> <p>Persons with disabilities at risk of digital exclusion targeted for ICT skills</p>
LT	National language	2 references to neįgali...	<p>Development of a model for the provision of long-term care services</p> <p>Integration of sectoral services in the provision of services for the disabled and the elderly</p> <p>Creating a new model for the organization and delivery of long-term care services that includes outpatient and inpatient (nursing and social care) in all municipalities (by 2024)</p> <p>The law on single person benefit has entered into force, which ensures that disabled and elderly persons (without a spouse) are granted and paid an additional monthly benefit (single person pension)</p>
LU	National language	22 references to handicap...	<p>New national action plan for the implementation of the CRPD 2019-2024</p> <p>Professionalization internship and the reintegration-employment contract</p> <p>Employees with disabilities can request assistance from ADEM</p> <p>Law of August 1, 2019 supplementing the Labour Code = employment inclusion assistance activity assistance with inclusion in employment</p> <p>Assessment of the current ASP system (social support) and common approach to disability assessment according to the 'one-stop-shop' principle will be proposed</p> <p>Second study will analyse the living conditions of persons with disabilities in Luxembourg leading to creation of a personal assistance budget increase in income for people with severe disabilities from January 1, 2021</p>
LV	National language	30 references to invalid...	<p>Improving the adequacy of income support for persons with disabilities</p> <p>The amount of the minimum disability pension has been increased</p> <p>The range of recipients of housing benefit has been expanded</p> <p>Energy (electricity) discounts</p> <p>Improvement and evolution of existing ALMP measures</p> <p>Share of persons with disabilities registered with the SEA has been constantly increasing</p> <p>Grant (up to EUR 1000) for adaptation of a workplace if a person with a disability starts a new business</p>

MS	National Reform Programme	Text references	Key points of relevance to disability
			<p>Target group for the training measures implemented by the SEA was expanded (including employed persons with disabilities)</p> <p>SEA plans to establish a consultative support centre</p> <p>changes to social enterprises</p> <p>access to healthcare</p> <p>poverty alleviation and Covid crisis</p>
MT	English	28 references to disab...(and 12 in Annex 1)	<p>Malta's 2021-2030 National Strategy on the Rights of Disabled Persons, Freedom to Live</p> <p>Freedom to Live Community Grant Scheme</p> <p>inclusive education</p> <p>Support for school leavers with a disability to bridge the gap between school and the workplace</p> <p>Extension of free public transport schemes</p> <p>Increased carer grant to parents who provide care to their severely disabled children of over 16 years of age</p> <p>New Hope Guarantee Scheme, government as guarantor to enable individuals with medical issues or disabilities to become homeowners</p> <p>inclusivity of people with a disability in the labour force</p> <p>Employment quota</p> <p>Training placements (EU funded)</p> <p>Vocational training schemes</p> <p>Annex 1 summarising measures in place</p>
NL	Not yet available	n/a	The Netherlands has not submitted a National Reform Programme yet, which will be integrated in the Recovery and Resilience Plan
PL	English	35 references to disab	<p>Annual Action Plan for Persons with Disabilities for 2022</p> <p>National Action Programme for Equal Treatment for 2022-2030</p> <p>Accessibility Plus Programme 2018-2025</p> <p>Possibility of reimbursing the costs of care for children with disabilities up to the age of 18</p> <p>Possibility to work in a more flexible form</p> <p>Evaluation of ICT teaching aids and tools for students with disabilities and blind students</p> <p>Increasing the transport accessibility</p> <p>The Act of 21 January 2021 - disability pension was increased</p> <p>Disability pensioners, receive a supplementary benefit in the amount not exceeding PLN 500 per month</p> <p>The Act of 9 January 2020 on an additional annual monetary benefit for disability pensioners</p> <p>Respite care schemes</p> <p>Personal assistance scheme</p> <p>Care and residential centres</p> <p>Family support centres</p>
PT	National language	47 references to deficiencia...	<p>National Strategy for the Inclusion of Persons with Disabilities 2021-2025</p> <p>Reform social services that respond to the interconnected challenges of childcare, ageing, long-term care and disabilities</p>

MS	National Reform Programme	Text references	Key points of relevance to disability
			<p>New disability assessment and certification system; New system for collecting and processing data and organizing information related to disability in order to support the decision-making process Qualification of interventions in public spaces integrating the inclusion of persons with disabilities in decisions, measures, programs and projects The extension of the Independent Life Support Model, which provides personal support to persons with disabilities Adapting the training, employment and qualification system for persons with disabilities PARES 3.0 programme (EUR 228.5 million) social facilities for the elderly and persons with disabilities In 2022, it is planned to design a proposal for a program to support the hiring and employability of persons with disabilities Internships (work experience) lasting 9 months, promoting the insertion of young people into the labour market or the retraining of the unemployed extension of parental leave to assist children with disabilities or chronic illness Reform of the Independent Living Support Model (MAVI) Social Services and Equipment Network Expansion Program (PARES) includes residential structures for the elderly and persons with disabilities, professional activity centres for persons with disabilities Creation of an entrepreneurship measure for persons with disabilities, and their families</p>
RO	National language	71 references to dizabilităţ...	<p>National Strategy on the Rights of Persons with Disabilities 2022-2027 Health and Social Reforms to develop public hospital infrastructure, including social infrastructure for persons with disabilities National Disability Management System The draft law on some protection measures for people with intellectual and psychosocial disabilities, adopted on December 10, 2021 (following Decision of the Constitutional Court no. 601/2020 regarding the exception of unconstitutionality of the provisions of art. 164 para. (1) of Law no. 287/2009 regarding the Civil Code) Legislative amendments to boost the socio-professional integration of persons with disabilities The deadline for implementing deinstitutionalization has been extended until the end of 2022 (examples of investments etc) One-off compensatory allowance granted in January 2022 Purchase of assistive technologies to facilitate labour market integration</p>
SE	National language	9 references to funktionsned...	<p>Example of 'The way out!' programme – cooperatives run 14 companies to help rehabilitate persons with disabilities</p>

MS	National Reform Programme	Text references	Key points of relevance to disability
			Proposed amendments to the law for a strengthened right to personal assistance Increased guarantee level in sickness and activity compensation and increased housing supplement Funktionsrätt Sverige – example projects aim to reduce the disability employment gap
SI	National language	12 references to invalid...	More flexible working methods adapted to the needs of persons with disabilities in companies for the disabled and employment centres Minimum pension for insured persons with 15 years of insurance entitlement to early, old-age or invalidity pension increased New guaranteed disability pension (minimum) for all recipients of disability pension In January 2022, pensions on the basis of the Act Amending the Pension and Disability Insurance Act were harmonized
SK	National language	6 references to postihnut...	No direct references to the situation of persons with disabilities or disability policies in the NRP other than in a medical context

1.7 The Commission Country Reports

The analytical phase of the Semester includes Country Reports prepared by Commission staff. These were published most recently in May 2022.²⁷ These reports highlight key challenges, gaps and promising practices that feed into the consideration of recommendations to the Member States. Increasing the attention given to disability equality in these analytical reports, and the quality of analysis, is important for the success of mainstreaming in the Semester process.

For the first time in 2022, all the Country reports refer to the new indicator disability employment gap indicator in the Social Scoreboard supporting the Social Pillar, which also now classifies Member States' performance on a seven-point scale (from 'critical situation' to 'best performers'). This is a major step forward in disability equality mainstreaming for the Semester but, overall, disability statistics and policy issues appear to achieve a lower visibility profile in the Country Reports than before the COVID-19 crisis (since when they were effectively suspended from the public process). Table 2 below shows the ways in which disability was explicitly referred to in each of the 2022 Country Reports.

It is interesting to observe that the disability employment gap indicator was added to the Social Scoreboard under the theme of 'Social protection and inclusion', while the Gender employment gap is listed under 'Equal opportunities and access to the labour market'. It is also worth noting that, while the Scoreboard lists the indicator as a 'ratio' it is in fact displayed as a gap in percentage points (as for the gender employment gap). Using a similar points methodology to the gender gap is helpful for headline comparison, and for promoting disability equality mainstreaming on a par with gender mainstreaming (i.e. the disability employment gap far exceeds the gender employment

²⁷ European Commission (2022) *2022 European Semester: Country Reports*, https://ec.europa.eu/info/publications/2022-european-semester-country-reports_en.

gap, although the disability effect is also compounded by gender when broken down in deeper analysis). Nevertheless, for purposes of comparison between countries an indicator based on disability employment ratio would be useful too (this is discussed and estimated for illustration later in this report, see section 5.2.2).

While the Scoreboard supports the Social Pillar there is little direct reference its provisions (and none to principle 17 on inclusion of people with disabilities). In general, the 2022 Country Reports pay increased attention to links with the SDGs, where disability concerns can be disaggregated but are often not.

Many of the references to ‘older workers’ in the Country Reports express concerns about participation that might relate to disability as well as age. For example, Commission concerns about early exit from the labour force, or long-term unemployment, among older workers often refer to the need for re-skilling when a significant proportion might relate to access to disability employment support or accessibility of the workplace. The prevalence of impairment in Member States’ populations rises strongly from about age 40 and the analysis of disability indicators consistently points to widening disability employment gaps with rising age in this group. Understanding age group breakdowns of the disability data, as well as gender breakdowns, is therefore important (this is evidenced in detail in the accompanying EDE statistical report and illustrated later in this report in section 5.3.3).

Some of the reports utilise a wider range of disability data from supplementary indicators, such as those provided in the EDE disability fiches. For example, the Country Report for Bulgaria quotes employment rates as well as gaps. The reports for Belgium, Ireland and Italy cite disability data on risk of poverty or social exclusion. Estonia alluded to these and to indicators on early school leaving, as did the Poland report. It is notable that some of these reports cited the relevant EDE Semester country fiche on disability equality as evidence. The number of direct text references varies considerably, from none in the Luxembourg report (apart from the Scoreboard indicator) to more than ten in the reports for Estonia, France, Ireland, Malta and Romania.

Table 2: Disability references in the 2022 Country Reports

MS	Disability employment gap	Example extracts from the Country Report
AT	Better than average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> ‘The many people with disabilities that are living in institutions remains a challenge, calling for an effective deinstitutionalisation strategy’ <p>There are also several references to the labour market participation of ‘older workers’</p>
BE	Critical situation	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> ‘Poor labour market outcomes, especially for vulnerable groups’ ‘...more than one out of three young adults with disabilities do not finish secondary education and their limited participation in higher education is one of the reasons for their low employment rate’ ‘The disability employment gap has increased, reaching 36.3 percentage points, which is well above the EU average of 24.3 percentage points’ ‘The share of people at risk of poverty or social exclusion in 2020 was significantly higher for... persons with disabilities (31.9 %) relative to the

MS	Disability employment gap	Example extracts from the Country Report
		<p>overall population (20.3 %), suggesting a strong correlation between lower employment rates and the prevalence of poverty.'</p> <ul style="list-style-type: none"> '...investment in childcare and social housing, including for persons with disabilities. The ESF+ will complement these investments with actions to support deinstitutionalisation of persons with disabilities in Wallonia.' <p>Limited progress is also noted on the 2019 CSR referring to active labour market policies for older workers</p>
BG	Critical situation	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> 'Vulnerable groups, such as older people, Roma and people with disabilities, are disproportionately at risk of poverty.' 'REACT-EU gives Bulgaria... provides food to the most deprived and home care for elderly and disabled people.' 'The disability employment gap is well above the EU average (33 pps vs 24.3 pps), with an employment rate of people with disabilities of 43.1 % in 2020, compared to 76.1 % for those without.' These figures point to the need for strengthening the provision of more tailored active labour market policies for vulnerable and underrepresented groups (e.g. people with disabilities and Roma), while taking into account the significant regional differences in labour market outcomes.'
CY	On average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> 'The plan also includes targeted investments to improve the living conditions and energy efficiency of households for people living in poverty, as well as for persons with disabilities.' 'The early school leaving rate in Cyprus increased to 10.2 % in 2021, which is above the EU average of 9.7 %, and is particularly high amongst non-EU born people and people with disabilities.' 'Although the at-risk-of-poverty-or-social-exclusion (AROPE) rate is relatively low in Cyprus, it remains higher than the EU average among people with disabilities (33.3 % vs EU 28.9 % in 2020).' 'To foster equal opportunities and social inclusion, the ESF+ will support measures to restructure social welfare services in Cyprus, and to establish a new network of social inclusion services for people with disabilities.' 'Furthermore, staff shortages pose a challenge, including for the health system (the density of nurses is 5.2 per 1 000 population, well below the EU average of 8.4). Cyprus' RRP and ESF+ operational programme will help address this problem by supporting long-term care for older people and people with disabilities.'
CZ	On average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> '...taking measures to increase labour supply. These measure could include, for example, supporting flexible/part-time work arrangements for young people and elderly workers, strengthening the labour market integration of women with young children and of vulnerable groups such as Roma people or people with disabilities, and facilitating migration and refugees' integration.'
DE	Critical situation	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> 'Moreover, the employment gap of people with disabilities (at 32.4 pps) widened in Germany in 2020.' 'The share of persons with disabilities at risk of poverty or social exclusion was (at 31.5 %) higher than the EU average (28.4 %).'
DK	Best performers	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> 'At 16.8 % in 2020, the rate of people at risk of poverty or social exclusion is relatively low compared to the EU average of 21.9 %, although certain groups, and in particular young people, migrants and persons with

MS	Disability employment gap	Example extracts from the Country Report
		disabilities, face barriers to accessing the labour market and a higher risk of poverty.'
EE	Better than average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'While poverty has been gradually decreasing, it remains high in certain groups, including unemployed people, older people and people with disabilities.' • 'While performance on 'no poverty' (SDG 1) is close to the EU average, it could be further improved with better protection of older people, unemployed people and people with disabilities.' • 'The adequacy of the social safety net has slightly improved, but the risk of poverty or social exclusion remains high for older people, people with disabilities and unemployed people.' • 'Estonia has taken some steps to improve social protection of older people and people with disabilities, notably by increasing pensions and unemployment benefits.' • 'In 2020 the rate of early leavers from education and training fell below the EU average. However, this hides significant differences: there is a higher rate for men, those in rural areas and amongst youth with disabilities.' • ESF – '...promoting social inclusion through better welfare and social services, such as affordable childcare and care services for older people and people with disabilities (EUR 169 million).' • 'The ESF also invested EUR 241 million for a more cohesive labour market, including EUR 157.5 million to reform the work ability system that helps people with disabilities join the labour market.' • 'Early school leaving was also higher in rural areas (12.3 %), and among young people with disabilities (16.2 %).' • 'In addition, 40.4 % of people with disabilities are at risk of poverty or social exclusion, which is one of the highest rates in the EU (compared to the EU average of 28.9 % in 2020).'
EL	On average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'The disability employment gap is slightly above the EU average (27.7 pps vs 24.5 pps).'
ES	Better than average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'Eurostat flash estimates on the at-risk-of poverty rate for income year 2020, point to an increase, including for children. Other groups particularly at risk include migrants and people with disabilities.' • 'Social expenditure is rather oriented towards the older generations...'
FI	Better than average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'Phasing out of the additional days of unemployment allowance for older people should start in 2023. In parallel, the eligibility for disability benefits for this particular age group may need to be adjusted.'
FR	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'A number of measures aim to upskill and re-skill workers with a special focus on digital skills. Hiring subsidies for employers recruiting people with disabilities, young people under 26 and those on apprenticeships and work-study contracts are expected to help these groups find jobs.' • '... reforms included in the plan have already been implemented in 2021: ...a law on social debt and autonomy, which supports the independence of the elderly and people with disabilities.' • 'The employment gap of people with disabilities rose by 3.9 pps to 22.8 % in 2020.' • '...since March 2022, young people under 26 or under 30 with disabilities, facing difficulties to access the labour market, can benefit

MS	Disability employment gap	Example extracts from the Country Report
		<p>from reinforced employment support during a maximum of 12 months, with an allowance to secure them during this period.'</p> <ul style="list-style-type: none"> • '...the employment gap remains high for people with disabilities (22.8 pps in 2020)' • 'The recovery and resilience plan (RRP) includes a range of measures such as hiring subsidies for employers recruiting people with disabilities and young people under 26, and for apprenticeships and work-study contracts.' • 'Equal access to education services for people with disabilities remains a challenge, calling for inclusion measures also in the context of a broader deinstitutionalisation process.' • 'Early school leaving rates are good overall but hide strong social disparities. As in most other EU countries, rates for boys are higher than for girls. Among young people with a disability, the rate was even higher, at 19.7 %. Equal access to education for people with disabilities remains a challenge and should be addressed through a deinstitutionalisation process.'
HR	Critical situation	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'The employment rate of people with disabilities is one of the lowest in the EU (36.9 % in 2020) and the disability employment gap remains high (32.9 pps in 2020), well above the EU average (24.5 pps).' • 'The AROPE rate of older people is still high (32.4 % against 20.3 % in the EU in 2020), especially women, and people with disabilities.'
HU	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'There is significant room to increase the employment rate of certain disadvantaged groups, such as the low-skilled, the long-term unemployed, people with disabilities, and Roma. Joblessness is concentrated in Hungary's less developed regions and in rural areas. These disadvantaged groups could be better helped by equipping them with skills and actively helping them to find jobs.' • '...the disability employment gap widened to 31.2 percentage points (pps) in 2020'
IE	Watch but improving	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'Some vulnerable groups – especially lone parent households and persons with disabilities – are at a higher risk of poverty and social exclusion, often exacerbated by difficulties to participate in the labour market and find employment. It is particularly important to quickly integrate groups with lower employment rates into the workforce, especially ... persons with disabilities...' • 'In addition, the disability employment gap in Ireland was the largest in the EU, at 38.6 %. These groups are also at an elevated risk of poverty and social exclusion. Tackling these challenges in line with the European Pillar of Social Rights is key for Ireland to contribute to reaching the 2030 EU headline targets on employment, skills and poverty reduction.' • 'While employment is already above prepandemic levels, it remains important to help under-represented groups, e.g. ...people with disabilities, integrate into the labour market.' • '... less than a third of people with disabilities were employed in 2019, with a disability employment gap of 38.6 pps recorded for 2020, which is also one of the highest in the EU.' • 'Concerns remain in relation to the availability of social services for disadvantaged groups, and the situation for homeless people, people with disabilities, single parent and low work intensity households. In 2020, people with disabilities had an almost 14 pps higher chance of being at risk of poverty or social exclusion than the general population (33.9 % versus 20 %).'

MS	Disability employment gap	Example extracts from the Country Report
IT	Best performers	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'As social spending is concentrated on pensions (9), the poverty risk for older people (65+) is much lower than it is for the average population. It is especially high for children, people with disabilities and people with a migrant background.' • 'The RRP aims to strengthen social inclusion and prevent marginalisation. The plan includes measures to strengthen social services and their territorial coverage, via reforms in the field of services for dependent people, expected in 2023, and for people with disabilities.' • 'The new Framework Law on Disability, adopted in December 2021, changes the disability assessment to take more multidisciplinary approach and aims to strengthen social services, promoting autonomy and de-institutionalization.' • 'In 2022, the first 500 projects are expected to adapt homes to the needs of people with disabilities.' • 'Italy completed major milestones regarding the framework law on disability, the reform of active labour market policies (including a focus on vulnerable groups) and the reform of university degrees.' • 'reform of services for nonself-sufficient elderly people; investment in projects to give people with disabilities more autonomy.' • 'Challenges remain as regards inclusiveness of and access to education for persons with disabilities.' • 'Despite improvements, in 2020 the rate of people at risk of poverty or social exclusion was still above the EU average (24.9 % vs 21.6 % in the EU). It is among the highest in the EU for children and also relatively high for people with disabilities.'
LT	Better than average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'Two reforms, namely introduction of an accreditation scheme for social care and additional benefit for disabled and elderly single persons, have already been reported as completed by Lithuania.' • 'Public expenditure on social protection is persistently low while the rates of people at risk of poverty or social exclusion remain among the highest in the EU (see Annex 12), especially for vulnerable groups such as older people (65+), single parents with dependent children and persons with disabilities.' • 'EU cohesion policy funds will focus on individualised active labour market policy measures for vulnerable groups, including ... persons with disabilities and other groups facing the biggest barriers to enter into the labour market.' • 'The at-risk-of-poverty or social exclusion rate is particularly high for ... persons with disabilities (38.7 % against the EU average of 28.6 % in 2020), with limited improvements observed over time.' • 'A recent analysis ... shows that the increases in basic social allowance (bazinė socialinė išmoka) and in the single person benefit to the elderly and persons with disabilities (vienišo asmens išmoka) in January 2022 are expected to reduce the poverty risk for families with children (7 %) and single individuals older than 65 (12 %).'
LU	Better than average	<p>Direct references to disability in the Country Report</p>
LV	Best performers	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'Limited access to services and low adequacy of social assistance for vulnerable groups (older people, persons with disabilities, the unemployed) - including long-term care, social housing and individual needs-based social services - further hinders social inclusion.'

MS	Disability employment gap	Example extracts from the Country Report
		<ul style="list-style-type: none"> • 'RRP...investments in accessibility and rehabilitation infrastructure for persons with reduced mobility and disabilities, as well long-term care investments for older people.' • 'By the end of 2023, work contracts to adapt the dwellings of more than 200 persons with disabilities will have been concluded and legislative amendments to improve the minimum income support system will have entered into force.' • 'Poverty risks and income inequality remain among the highest in the EU... The situation is particularly poor for older people, the unemployed and persons with disabilities.' • 'Despite the increases, the income of the recipients of the minimum income support, pensions and disability benefit falls well below the poverty line (see Annex 12).' • 'Active labour market policy measures totalling EUR 255 million (including those targeting young people, long-term unemployed and persons with disabilities), ...' • 'EUR 50.5 million was allocated to community-based social services for persons with disabilities and children in out-of-family care. Nearly 600 persons with mental disabilities and 2 300 children with functional impairments have received support for independent living in the community.' • 'The depth of poverty is increasing (from 24 % in 2016 to 28.6 % in 2020) to one of the highest in the EU. Poverty or social exclusion risks for older people aged 65+ (at 43.1 %) and for persons with disabilities (at 39.3 %) remain among the highest in the EU.' • 'Recent increases in minimum income, pensions and disability benefits, and universal child benefits will provide some support to the poorest 10 % of the population. However, with the minimum income amount set at EUR 109 in 2021, the net income of the benefit recipients still falls well below the poverty line...' <p>'Some Progress' is noted on 2019 CSR 2 to 'Address social exclusion notably by improving the adequacy of minimum income benefits, minimum old-age pensions and income support for people with disabilities.'</p>
MT	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'In 2020, the at-risk-of-poverty-or-social-exclusion (AROPE) rate of the total population was around 20 %, slightly below the EU average of around 22 %. However, this rate is much higher among people with disabilities, non-EU nationals, and people aged over 65' • 'While the overall at-risk-of-poverty-or-social-exclusion (AROPE) rate was slightly below the EU average (19.9 % vs EU 21.6 %) in 2020, the percentage is much higher for non-EU nationals, people aged over 65, and for people with disabilities (30.1 %) than for the overall population (also see Graph 3.1). ' • 'At 29.4 pps in 2020, the disability employment gap is above the EU average (24.5 pps).' • 'While the at-risk-of-poverty-or-social-exclusion (AROPE) rate was 19.9 % in 2020 (vs 21.6 % in the EU), it was 28.2 % for non-EU nationals, 28.5 % for people aged over 65, and 30.1 % for people with disabilities.'
NL	On average	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • '...self-employed are not subject to social security contributions related to sickness, disability, unemployment and old age.' • 'People with flexible and/or temporary contracts (mostly the young, low(er) skilled, people with a migrant background or disabilities), along

MS	Disability employment gap	Example extracts from the Country Report
		<p>with the self-employed without employees, were the groups hit hardest during the pandemic'</p> <ul style="list-style-type: none"> • 'The coalition agreement of the current government intends to address differences between permanent and flexible work arrangements and to improve social protection for the self-employed, notably by introducing mandatory disability insurance.' • 'The COVID-19 pandemic exacerbated risks in an already highly segmented labour market. People with flexible contracts (in particular young people, lower skilled, people with a migrant background and/or with disabilities) were among the groups hit the hardest, together with the self-employed without employees.' • 'While the at-risk-of-poverty or social exclusion rate in the Netherlands is stable and well below the EU average, challenges remain for specific groups, such as people with a migrant background and those with disabilities.' • 'In addition, 24.9 % of people with disabilities were at risk of poverty or social exclusion in 2020 (versus 12 % of those without).'
PL	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'As a result of the tax reform in 2022, a person who reaches the retirement age (not receiving any old-age or disability pensions) but remains in the labour market will be exempted from the tax (up to PLN 86 thousand per year).' • 'Labour market outcomes are weak and worsening for persons with disabilities, which recorded in 2020 an employment rate of only 46.8 % compared with 78.1 % for persons without. The employment rate of older workers, despite recording a steady increase, is still 7.8 pps below the EU average (59.6 %), with a much bigger gap for older women, at 12.4 pps below the EU average (53.4 %).' • 'Care responsibilities for children, but also for family members with disabilities, are a barrier to female employment.' • 'The employment rate of persons with disabilities in 2020 was 46.8 %, compared to 78.1 % for persons without (a disability employment gap of around 31.3 pps, higher than the EU average). The employment rates of older workers, especially women, and of low-skilled people lag behind the respective EU averages.' • 'The share of early leavers from education and training is, at 5.9 % in 2021, significantly below the EU average of 9.7 %, but it is particularly high among persons with disabilities.'
PT	Best performers	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'The number of early school leavers from education and training has decreased significantly. Disability and gender employment gaps have narrowed...' • 'As part of the RRP, Portugal has adopted national strategies to combat poverty and for the inclusion of people with disabilities. These aim to improve social care facilities and the coverage of social services with a community-based approach.'
RO	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'The labour market performed well despite the COVID-19 pandemic, but key challenges remain... while the disability employment gap increased to 30.4pps' • 'Current trends point to an 8.8 % reduction in the workforce in 2030 compared to today. This will require higher productivity levels and an increase in the employment rate, notably of women, Roma, young and older people, persons with disabilities and those with a low educational attainment.'

MS	Disability employment gap	Example extracts from the Country Report
		<ul style="list-style-type: none"> • 'Social and health services remain insufficient, including access to long-term care. Lack of human resources and administrative capacity at local level are among the factors affecting the availability of integrated services and progress in the deinstitutionalisation of adults with disabilities.' • 'The social reforms aim to support children, persons with disabilities and older people as well as the formalisation of domestic work' • 'The deinstitutionalisation of persons with disabilities should accelerate their integration into the community.' • 'The ratio between the top and bottom 20 % of the income distribution (S80/S20) remains among the highest in the EU in 2020. Disadvantaged groups such as undeclared workers, the self-employed in agriculture, Roma, persons with disabilities, older people and the homeless are among the worst affected and are facing a level of risk above the EU average.' • 'Investments in social infrastructure, including for people with disabilities and day centres for children at risk, will also aim at improving energy efficiency and reducing greenhouse gas emissions.' • 'The disability employment gap stood at 30.4 pps in 2020, above the EU average of 24.5 pps. Persons with disabilities still face reduced training opportunities.' • '...the rate of early leavers from education and training is high and likely to worsen due to the pandemic (see Annex 13), affecting in particular students with disabilities or disadvantaged backgrounds, such as Roma and people living in rural areas.' • 'The share over 65 year-olds and people with disabilities at risk of poverty or social exclusion also remains among the highest in the EU.' • 'Social, health, educational and employment services are insufficiently integrated and the deinstitutionalisation process for adults with disabilities is lagging behind.' • 'Implementing the minimum inclusion income, minimum wage and pension reforms, investments in child protection and the deinstitutionalisation of people with disabilities, as outlined in Romania's RRP could help the country achieve the 2030 EU headline target on poverty reduction.'
SE	To watch	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'A sizeable group of workers lacks the skills to grasp the opportunities the Swedish labour market offers... In addition, a significant group of people, such as people with disabilities and women born outside of Sweden, find it difficult to become and remain employed.' • 'By the end of 2020, cohesion policy investments had supported 43400 enterprises, 95000 migrants or people from migrant backgrounds, 33000 long-term unemployed and more than 40000 people with disabilities.' • 'The pandemic disproportionately affected the employment participation of people with disabilities, as the disability employment gap increased by 4 pps from 2019 to reach 28.9 % in 2020.' • 'The AROPE of people with disabilities is almost double compared to those without disabilities (29 % vs 15.7 % in 2020), and slightly exceeds the EU average.'
SI	Good but to monitor	<p>Direct references to disability in the Country Report</p> <ul style="list-style-type: none"> • 'An ageing population presents a serious challenge to growth prospects. Similar to other Member States, the Slovenian working age population is expected to shrink over the next decades, pushing up the old-age indicators 'at risk of poverty or social exclusion' and 'disability employment gap', it is assessed as 'good but to monitor' (see Annex 12).'

MS	Disability employment gap	Example extracts from the Country Report
		<ul style="list-style-type: none"> ‘Other actions set out in the plan include adapting working environments to the needs of people with disabilities and providing training and education to employees...’
SK	On average	Direct references to disability in the Country Report ‘...the gap in the employment rate between people with and without disabilities is 23.6 pps.’

1.8 The Country Specific Recommendations

Country Specific Recommendations (CSRs) were published for all Member States in May 2022.²⁸ The new CSRs focus on priorities for change in 2022 and 2023 but build on, and refer to, the previous recommendations of 2019 and 2020 which remain relevant to consideration of the implementation the NRPs and RRs. Disability is mentioned in five or six of the 2022 CSR fiches, and in passing reference rather than as a focus for recommendation. This is unsurprising given the immediacy of the war in Ukraine and the focus on budgetary and fiscal issues in these high-level conclusions, but it does indicate a distinct reduction of visibility for disability mainstreaming when compared to CSRs prior to the COVID-19 pandemic (18 of the CSRs referred to disability in 2019).

The CSR for Belgium mentions disability in relation to strengthening the social and labour market integration of ‘vulnerable’ groups, and secondary educational attainment. The CSRs for Estonia and Latvia mention the elevated disability risk of poverty or social exclusion. The CSRs for Hungary and Poland refer to persons with disabilities in terms of labour market disparity for ‘disadvantaged’ groups (employment rate/gap). As in previous years, there is also a reference to disability insurance coverage for self-employed people in The Netherlands CSR.

There is considerable duplication, or common concern, among the CSRs to implement strategic investment decisions and to address the challenges resulting from the COVID-19 pandemic and the war in Ukraine. These include recommendations to finalise the measures already proposed in the national RRs (several of which are relevant for a disability analysis, as shown later in section 2.2). There are widespread recommendations to target specific support to households that may be vulnerable to energy price rises (which includes a disproportionate number of disabled households, as evidenced by the disability indicator for risk of poverty or social exclusion). Support to people fleeing Ukraine is also targeted (which may include support for older and disabled refugees, who may face eligibility barriers to accessing some disability entitlements in some Member States). Several Member States are recommended to address the sustainability of the long-term care system (which directly affects the right to independent living, including a significant number of older people). Other recommendations focus on support for labour market participation and skills gaps of disadvantaged groups (among which persons with disabilities are perhaps the most significant group, as evidenced by the disability employment gap indicator).

²⁸ European Commission (2022) *2022 European Semester: Country Specific Recommendations / Commission Recommendations*, https://ec.europa.eu/info/publications/2022-european-semester-country-specific-recommendations-commission-recommendations_en.

Table 3: Relevant issues in the 2022 CSRs

MS	Country Specific Recommendation
AT	<p>No direct reference to disability in the CSR</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition adequacy and fiscal sustainability of the long-term care system implementation of recovery and resilience plan and previous CSRs Boost labour market participation of women, including by enhancing quality childcare services improve labour market outcomes for disadvantaged groups
BE	<p>The CSR mentions disability in reference to strengthening the social and labour market integration of vulnerable groups, and secondary educational attainment</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition improve fiscal sustainability of long-term care cost efficient use of the different care settings Reform the taxation and benefit systems to reduce disincentives to work implementation of recovery and resilience plan and previous CSRs (including pension reform) Address labour shortages and skills mismatches performance and inclusiveness of the education and training system quality and labour market relevance of vocational education and training flexible and attractive career paths and training for teachers
BG	<p>No direct reference to disability in the CSR</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs this includes actions on labour market relevance of education and lifelong learning systems and widening healthcare services <p>There are no new recommendations addressing labour market or social policy issues.</p>
CY	<p>No direct reference to disability in the CSR</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs this includes actions on earlier recommendations concerning upskilling and reskilling programmes, childcare facilities, digital skills and technologies in schools, e-health portal, and long-term care social and affordable housing (legislative framework and improved coordination between different public bodies) <p>There are no new recommendations addressing labour market or social policy issues.</p>
CZ	<p>No direct reference to disability in the CSR</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine

MS	Country Specific Recommendation
	<ul style="list-style-type: none"> investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs this includes actions on earlier recommendations concerning health care, labour market and social policy, education and skills <p>There are no new recommendations addressing labour market policies.</p>
DE	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs labour shortages sustainable transport digitalisation of the public administration and health services <p>There are no new recommendations addressing labour market or social policy issues.</p>
DK	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs investment in construction of affordable housing <p>There are no new recommendations addressing labour market policies.</p>
EE	<p>Disability is mentioned in the CSR in relation to the high risk of poverty and social exclusion Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs this includes actions on earlier recommendations concerning health care, labour market and social policy, education and skills extend coverage of unemployment benefits affordability and quality of long-term care integrating health and social services
EL	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs accessibility and resilience of the health system active labour market policies policies supporting public investment in education, skills and employability rollout of the primary health-care reform (staffing, registration and gatekeeping) <p>There are no new recommendations addressing labour market policies.</p>
ES	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine

MS	Country Specific Recommendation
	<ul style="list-style-type: none"> • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes reinforcing active labour market policies, addressing the fragmentation of unemployment assistance, developing digital learning, improve the coverage and adequacy of minimum income schemes and family support • Increase the availability of energy-efficient social and affordable housing, including through renovation <p>There are no new recommendations addressing labour market policies.</p>
FI	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • social security reform (efficiency of the system of social benefits) • incentives to work • healthcare reforms
FR	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes actions the labour market, health and long-term care, sustainable transport, youth employment and education • Reform the pension system (unify the rules of the different pension regimes) • raising the level of basic skills (work-based learning options adapting resources and methods to the needs of disadvantaged students) <p>There are no new recommendations addressing labour market policies.</p>
HR	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • labour market integration of the most vulnerable groups <p>There are no new recommendations addressing labour market or social policy issues.</p>
HU	<p>Disability is mentioned in the CSR with reference to increasing the employment rate of disadvantaged groups Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • labour market integration of the most vulnerable groups • extend the duration of unemployment benefits • adequacy of social assistance • access to essential services and adequate housing for all • Improve education outcomes and increase the participation of disadvantaged groups • access to quality preventive and primary care services

MS	Country Specific Recommendation
	There are no new recommendations addressing labour market policies.
IE	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes active labour market integration support and upskilling, reforms of social and affordable housing, pensions and healthcare sustainability of the state pension system <p>There are no new recommendations addressing labour market or social policy issues.</p>
IT	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes reforms and investments to improve employment prospects (e.g. for young people and women) and raise labour supply <p>There are no new recommendations addressing labour market or social policy issues (beyond tax reforms).</p>
LT	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes quality and efficiency of health services, enhancing social protection, prioritise education, and increasing the effectiveness of the public sector weaknesses in the planning and delivery of social services shortages and uneven distribution of health professionals limit access to primary healthcare services insufficiently address the needs of unemployed people reform of the minimum income scheme Improve access to and quality of social housing <p>There are no new recommendations addressing labour market policies.</p>
LU	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes measures to increase the public supply of affordable housing, digital public services, skills strategy and training programmes (target for older workers) long-term sustainability of the pension system limit early retirement and increase the employment rate of older workers Reduce the impact of inequalities on pupils' performance and promote equal opportunities for all students in the educational system health system resilience labour market inclusion shortage of affordable housing

MS	Country Specific Recommendation
LV	<p>Disability is mentioned in the CSR in relation to benefit levels and poverty risk.</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes indexation for minimum income benefits, Riga transport system, building schools and affordable housing, modernising hospitals access to and quality of social assistance and services for vulnerable groups long-term care system (limited supply of home care and community-based services) Social housing is scarce and often does not provide adequate living conditions social assistance varies across municipalities <p>There are no new recommendations addressing labour market or social policy issues (beyond tax reforms).</p>
MT	<p>No direct reference to disability in the CSR</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes reforms and investments to address the challenges identified in health, employment, education and skills <p>There are no new recommendations addressing labour market or social policy issues.</p>
NL	<p>Disability is mentioned in the CSR in relation to social protection for self-employed people.</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan (not yet submitted) and previous CSRs Address labour and skills shortages tapping underutilised labour potential Strengthen up- and reskilling opportunities, notably for those at the margins of the labour market and the inactive <p>There are no new recommendations addressing social policy issues.</p>
PL	<p>Disability is mentioned in the CSR in relation to labour market disparities (low employment rate).</p> <p>Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs quality and inclusiveness of education labour market participation of some groups continues to be constrained primary care system is understaffed and overstretched some elderly people exposed to an increasing risk of poverty increase the effective retirement age accelerate e-health services

MS	Country Specific Recommendation
	<ul style="list-style-type: none"> • Foster quality education and skills relevant to the labour market, especially through adult learning and improving digital skills • Better target social benefits and ensure access to those in need
PT	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes improving access to quality health and long-term care, vocational education and skills, improving social services, increasing the supply of social and affordable housing <p>There are no new recommendations addressing labour market or social policy issues.</p>
RO	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes the sustainability and fairness of the public pension system, access to healthcare, and public procurement <p>There are no new recommendations addressing labour market or social policy issues.</p>
SE	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes making the health care system more resilient, and raising the education and skills level • Improve the efficiency of the housing market • make the health care system more resilient • better integration of disadvantaged groups in the labour market • providing equal access opportunities to schools • Develop skills of disadvantaged groups to help their integration into the labour market <p>There are no new recommendations addressing labour market or social policy issues.</p>
SI	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p> <ul style="list-style-type: none"> • targeted support to households most vulnerable to energy price hikes • support to people fleeing Ukraine • investment for the green and digital transition • implementation of recovery and resilience plan and previous CSRs • This includes social safety nets and employment • reforms of the healthcare and long-term care systems (for quality and inclusion) • long-term fiscal sustainability of the healthcare and long-term care systems <p>There are no new recommendations addressing labour market policies.</p>
SK	<p>No direct reference to disability in the CSR Key recommendations of relevance might include:</p>

MS	Country Specific Recommendation
	<ul style="list-style-type: none"> targeted support to households most vulnerable to energy price hikes support to people fleeing Ukraine investment for the green and digital transition implementation of recovery and resilience plan and previous CSRs This includes a focus on inclusive education <p>There are no new recommendations addressing labour market or social policy issues.</p>

2 Update on investment priorities and Recovery and Resilience Plans

A great deal of work was done in the past decade to mainstream disability equality in the allocation EU Structural Funds.²⁹ To support the implementation of the Disability Strategy and of the UNCRPD, the EU continues to promote the use of EU funding by the Member States as provided for in the Multiannual financial framework 2021-2027 and by new funding opportunities under the Recovery plan NextGenerationEU.

The Common Provisions Regulation³⁰ for shared management funds notably requires that national frameworks to ensure implementation of the UN CRPD is in place and that arrangements are in place to ensure accessibility in funded projects. In this context, the Commission called on Member States in 2021 to:

- ensure partnership with regional, local authorities, representative organisations of persons with disabilities, civil society, fundamental rights bodies and other stakeholders in the design and implementation of EU funds;
- encourage the UN CRPD focal points to support the fulfilment of the relevant enabling conditions throughout the programming period.

As mentioned earlier, the Recovery and Resilience Facility (RRF) has important consequences for investment with lasting impacts. This presents opportunities but also risks if the investment priorities do not take account of a disability perspective. For example:

- Where CSRs called for improving ‘the accessibility and resilience of the health system’ in 2020, including shortages, we should acknowledge the gaps in unmet needs reported by persons with disabilities so that these can be addressed in health system investments, by targeting disability access and accessibility.
- The 2022 CSRs include a focus on investments in digital transition and sustainable transport (without reference to disability). Structural investment in these areas must prioritise accessibility to persons with disabilities in accordance with EU funds and public procurement requirements, as well as compliance with CRPD Article 9.

In the 2022 Semester, the focus has shifted from framing investment priorities in the Member States’ plans to ensuring their implementation. The 2022 CSRs include a strong focus on concluding these agreements and realising the commitments made in the previous cycle. Monitoring this implementation of these projects from a disability perspective will be important in ensuring accessibility and inclusion.

²⁹ Quinn, G., & Doyle, S. (2012). Taking the UN convention on the rights of persons with disabilities seriously—the past and future of the EU structural funds as a tool to achieve community living. *The Equal Rights Review*, 9, 69-94; McEvoy, E. (2020). EU structural and investment funds and disability. In *Research Handbook on EU Disability Law*. Edward Elgar Publishing.

³⁰ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy, OJ L 231, 30.6.2021, p. 159-706.

2.1 Developing equal opportunities guidance

As reported last year in 2021, under agreement on the Recovery and Resilience Facility regulation (RFF), Member States were invited to prepare ‘national reform programmes and recovery and resilience plans in a single integrated document’.³¹ The Commission’s guidance drew Member States’ attention to matters of equality and fairness within these Plans.³² Each Plan should explain how ‘Gender equality and equal opportunities for all’ are addressed by the measures proposed and include recognition of the challenges arising from the COVID-19 crisis. Disability was one of the equal opportunities grounds to be considered in the Plans (under principle 3 of the Social Pillar). The EDE country fiches examined these Plans in 2021.

Disability mainstreaming was an expectation in the guidance. Member States were requested to ‘explain how the reforms and investments supported by the plan will be instrumental in overcoming the equality challenges identified’ – by responding to the following questions (see Guidance Part 1, p. 11):

How does the plan promote equal opportunities regardless of gender, racial or ethnic origin, religion or belief, disability, age, and sexual orientation? When doing so, Member States are for example invited to explain how the plan ensures the mainstreaming of those objectives across relevant policies.

How does the plan ensure respect for the rights of people with disabilities in conformity with the UN Convention on the Rights of Persons with Disabilities and the rights of other disadvantaged and marginalised populations? In this regard, Member States are for example invited to explain how the plan ensures disability (and otherwise) inclusive reforms of education, labour market and health sectors, accessibility of buildings, services and websites as well as transition from institutional to community-based services.

In addition, the guidance invited Member States ‘to disaggregate the data they present by gender, age, disability and racial or ethnic origin wherever possible’. The EDE country fiches, and summary statistical tables, illustrate this kind of disaggregation from a disability perspective from available EU and national sources.

The addition of explicit guidance on disability mainstreaming in the 2021 Semester was a significant step forward and it would be relevant for the Commission to consider Member States’ compliance with it. The adoption of similar advice for the preparation of National Reform Programmes in future Semester cycles would be most welcome.

³¹ European Commission (2021) *Questions and answers: The Recovery and Resilience Facility*, https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_481.

³² *Commission staff working document - Guidance to Member States Recovery and Resilience Plans* (Part 1 and Part 2), https://ec.europa.eu/info/files/guidance-member-states-recovery-and-resilience-plans_en.

2.2 Implementation of the Recovery and Resilience Plans (RRPs)

The RRP were prepared on national websites in 2021, mainly in national languages and in varying formats, with summary highlights published on the Commission website. These plans were reviewed by EDE country experts. New information published since then mainly concerns the development of projects drawing down funds from the EU Facility. Summaries were published in a standard format on the Commission pages and focus on high level priorities. The situation of persons with disabilities is rarely mentioned in these headline summaries, along with other groups marginalised groups, but many of the key initiatives are relevant from a disability perspective.

At the time of writing (May 2022), no RRP had been submitted by The Netherlands and no summary outline of key investment initiatives was published for Bulgaria, Hungary, Poland, Romania or Sweden.³³ Among the remaining 22 Member States, disability was referred to in only four cases. The summary of the Belgian RRP mentioned disability in reference to the participation of 'vulnerable groups'. The Croatian summary mentioned disability with reference to sustainable mobility (investment in autonomous taxis). The Portuguese summary mentioned disability with reference to 'extending the coverage of social services, including long-term care and actions for people with disabilities'. The Italian RRP summary included 'improving the quality of life of persons with disabilities' as an objective.

It is worth noting that other marginalised target groups were also rarely named in the headline summaries of the RRP (women, young people, older people, migrants, and so on). It will be useful therefore to look in more depth at the most relevant investment projects in each Member State, from a disability perspective, during the preparation of the disability fiches by EDE's national experts in 2022. The following preliminary analysis of summary information provides a basis for this (and is further elaborated in the subsequent table).

In accordance with the goals of the investment Facility, the RRP key measures for each country are grouped under three themes - Green transition, Digital transition, and Economic and social resilience. Each of these include investments of potential interest from a disability perspective, although the most relevant to the Semester agenda are those in the latter category (e.g. concerning support for employment, social policies and healthcare, or education and skills).

Within the theme of Green transition, several Member States commit new investments in sustainable transport, home heating schemes, and the renovation of public buildings. Each of these has a particular relevance to persons with disabilities. Older and persons with disabilities are more likely to spend time at home and many face additional costs of living, associated with lack of mobility, including a high reliance on home heating. In the current cost of living crisis they are likely to be hit harder by fuel poverty and likely to benefit more from reduced home heating costs than the average. Their needs should therefore be acknowledged and targeted in any such scheme.

³³ European Commission (2022) *Recovery and Resilience Facility: National recovery and resilience plans*, https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility_en#national-recovery-and-resilience-plans.

Similarly, persons with disabilities are more likely to be reliant on public transport systems and any major infrastructure or vehicle replacement initiative, ostensibly for reasons of de-carbonisation, is also an opportunity to prioritise accessibility in design. The same is true for refurbishment projects targeting public buildings.

Some of the showcase projects already highlighted by the Member States and the Commission signal this possibility. For example, 'Overhaul of the Riga metropolitan area transport infrastructure' (Latvia), extensions of the travel networks in Lisbon and Porto (Portugal), a 'common transport system for the Tallinn capital region' (Estonia), or the purchase of new buses (Malta, Germany), each present opportunities and risks for travellers with disabilities. EU funds will be used to modernise public buildings (Lithuania), including hospital buildings (Slovakia) and schools (Slovenia), and to build 'new hospitals and long-term care facilities' (Czechia). It is vital that such capital refurbishment and infrastructure projects drawing on EU funding are not only compliant but also exemplary in their promotion of accessibility for persons with disabilities.

Within the theme of Digital transition there are also several risks and opportunities for persons with disabilities arising from the key initiatives identified, which may benefit from further investigation by national experts and the Commission. Persons with disabilities, notably older persons, are less likely to have internet access at home and may face additional cost barriers to higher quality services and adaptive equipment. Member States are committed to increase uptake and digital services, including through the digitisation of public administration and e-government. Accessibility, additional disability costs and inclusive digital skills training are all key to ensuring that digitalisation investments are inclusive. Such key initiatives might include exemplar projects providing 'IT equipment to disadvantaged learners in schools' (Ireland) or IT-focused curriculum reforms (Czechia), or 'digitalisation in education' (Spain), 'computer libraries' (Latvia), investing in e-health (France), 'one-stop-shop for all public administration online services' (Croatia), or 'Better services for citizens and businesses (e-government)' (Slovakia). These and parallel examples would benefit from a disability perspective or equality audit.

Finally, within the theme of Economic and social resilience there are numerous examples of relevant key initiatives that, while not flagged as disability equality concerns should be considered from this perspective in reference to the Semester review. In the field of employment, there are several initiatives to restructure or modernise public employment services. There are also some key initiatives that address social services and benefit reforms, as well as education and childcare.

Persons with disabilities are less likely to be in employment, more likely to be seeking work, and more likely to be in contact with such services. For example, there are exemplar projects for a 'one-stop shop for the long-term unemployed' (Austria), 'individualised support and training to job seekers' (Belgium), the 'My first job' scheme (Estonia), 'Redesigning and strengthening active labour market policies to increase full-time employment, including for long-term unemployed and disadvantaged people' (Greece), a 'Nordic model of employment services' (Finland), 'Jobs and training for young people' (France), a 'Work Placement Experience Programme' (Ireland), and investment to 'Digitalise the National Employment Agency' (Luxembourg). In each of these cases it is relevant to ask if job seekers with disabilities are among the target

groups, whether the services they use are included, and whether the reforms raise any questions of incomplete accessibility or inclusion for them.

In the field of social policies and health persons with disabilities are also over-represented as users of services in cash and kind. For example, several member states mention investments in early childcare services or facilities, to increase supply of places (Greece) and facilities (Italy) that are affordable (Czechia). There are efforts at 'improving the provision of long-term care, in particular for children with higher care needs' (Estonia), and 'Enhancing social and health care capacities through community-based solutions' (Slovakia). And investments in 'extending unemployment benefits in periods of high unemployment' (Estonia), 'reforming a guaranteed minimum income protection scheme', and 'increasing coverage of unemployment social insurance' (Lithuania). There may be a disability dimension to the impact of such types of projects, which would benefit from consideration of accessibility and inclusion.

While these examples are not exhaustive, and summary information for some Member States is missing, they draw attention to the need for a disability perspective in the Commission's assessment of implementation. Capital expenditure on the built environment, transport and ICTs should be compliant with EU expectations and standards for accessibility. Major projects, such as the redesign of sustainable transport systems, should aim for exemplary attention to disability equality by design. Reforms of employment support, public administration and social services of general interest should equally pay attention to the coverage of persons with disabilities' needs and their full participation and inclusion by design.

Table 4 summarises the availability of RRP documents, whether they refer to disability measures directly, and the kinds of general initiatives that may be most relevant to consider further from a disability perspective in the 2022 Semester.

Table 4: Relevant measures identified in the RRP summaries

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
AT	National language	National language	<p>No direct reference to disability in the summary</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Investments in transport • Low carbon home heating • Improving digital skills • Higher speed broadband • Computers and digital skills for secondary school pupils • Digital public administration • Reducing incentives for early retirement • Early childhood care facilities • Primary healthcare • Long-term care • Example project: one-stop shop for the long-term unemployed
BE		National language	<p>The summary mentions disability only in reference participation of vulnerable groups.</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Reform of pension regime

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<ul style="list-style-type: none"> • Renovation of buildings, including social housing • Improving railway infrastructure, and new buses • Digitising public administration to improve access for citizens • Digital skills • More inclusive and future-proof education system • Example project: individualised support and training to job seekers
BG	English	English	No summary information published
CY		English	No direct reference to disability in the summary Key measures of relevance might include: <ul style="list-style-type: none"> • Increasing emphasis on public transport • Digitalisation of public services • Upgrading digital infrastructure and tools in schools • Teacher training • Upgrade state hospitals • Upgrading school infrastructure • Example project: supporting early childhood education and child care
CZ	National language		No direct reference to disability in the summary Key measures of relevance might include: <ul style="list-style-type: none"> • Renovation to increase the energy efficiency of residential and public buildings, including childcare and long-term care facilities • Improving railway infrastructure • Example project: digital equipment for schools • IT-focused curriculum reforms • Digital public administration • Increasing access to affordable pre-school care • Additional tutoring for children at risk of failure • Building new hospitals and long-term care facilities
DE	National language	English	No direct reference to disability in the summary Key measures of relevance might include: <ul style="list-style-type: none"> • Investment in new buses and rail • Example project: support to buy electric cars • Making federal and regional public services digitally available • Create national online education platform • Additional childcare places • Supporting apprentices
DK	English		No direct reference to disability in the summary Key measures of relevance might include: <ul style="list-style-type: none"> • Digitalisation of SMEs and the public administration • Example project: Strengthen the digitalisation of the Danish healthcare system
EE	English	National language	No direct reference to disability in the summary Key measures of relevance might include: <ul style="list-style-type: none"> • A common transport system for the Tallinn capital region • Provision of digital skills

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<ul style="list-style-type: none"> • Digitalising public administration • Increasing the resilience and accessibility of the health care system • Increasing the resilience and accessibility of the health care system • Incentivising youth employment through wage and training support • Extending unemployment benefits in periods of high unemployment • Improving the provision of long-term care, in particular for children with higher care needs • Example project: 'My first job'
EL	English	English	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Investments in buses and rail • Promotion of electric vehicles • Digital transformation of the public sector, businesses, education and health system • Example project: digital transformation of education • Redesigning and strengthening active labour market policies to increase full-time employment, including for long-term unemployed and disadvantaged people • Create new early childcare places • Comprehensive national public health programme
ES	National language	National language	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • New social housing • Improving railway infrastructure • Developing urban public transport • Example project: energy renovations of residential buildings • Digital skills training • Digital transformation of the public administration • Example project: digitalisation in education • Improve youth employability • Modernise the vocational education and training system • Reforming the system of hiring incentives • Developing individual pathways for counselling • Modernising public employment services • Example project: modernising VET to boost economic growth and social inclusion
FI	English	Fiscal Plan	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Digital innovations for social welfare and health care services • Reform of the Public Employment Services • Streamlining healthcare service processes • Example project: Nordic model of employment services
FR			No direct reference to disability in the summary

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Building renovation • Modernisation of railway network • Example project: Ma Prime Renov', thermal renovation of households • Digitalisation of primary and secondary schools • Example project: Digitalisation of the education and training systems • Jobs and training for young people • More inclusive education system • Apprenticeships, hiring subsidies, or places in boarding schools • Investing in e-health • Renovating medical centres and residential care homes for elderly people • Example project: Jobs and training for young people
HR	National language	National language	<p>The summary mentions disability with reference to sustainable mobility (investment in autonomous taxis).</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Example project: Post-earthquake reconstruction of public buildings • Digitalisation of the justice system • Digital Identity Card • One-stop-shop for all public administration online services • Redesigning active labour market policies • Improving the provision and adequacy of social benefits and services • Example project: Early childhood education and care
HU	National language	National language	No summary information published
IE		English	<p>No direct reference to disability in the summary</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Energy efficiency in residential and public buildings • Digitalise the public administration, in particular the healthcare system • Promoting digital skills • IT equipment to disadvantaged learners in schools • Access to the labour market for jobseekers • Increase the supply of social and affordable housing • Example project: Work Placement Experience Programme
IT	National language	National language	<p>The summary mentions disability with reference to improving quality of life.</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Example project: Ecobonus, improving energy efficiency of residential buildings • Digitalisation of the public administration

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<ul style="list-style-type: none"> • Example project: Gigabit connectivity to schools and healthcare facilities • Increase the supply of childcare facilities • Improve women's and youth participation in the labour market • Reinforce vocational training • Enhancing the use of telemedicine • Strengthening local social services • Improving the quality of life of persons with disabilities • Example project: Childcare facilities
LT	National language	National language	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Renovations of buildings • Improving public transport services • Promote digital skills • Universal access to digital resources • Example project: Development of Lithuanian-language technological resources • Modernising the infrastructure of healthcare facilities • Digitalisation of the health system • Quality accessible lifelong education • Reforming a guaranteed minimum income protection scheme • Increasing coverage of unemployment social insurance
LU	National language	National language	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Digitalise the public administration • Digital skills for workers • Example project: Digitalise the National Employment Agency (ADEM) • Vocational training programmes, 'Digital Skills' and 'Futureskills' • Increase the supply of affordable and sustainable housing • Example project: 'Housing Pact 2.0'
LV	National language	English	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Increase the energy efficiency of residential buildings • Example project: Overhaul of the Riga metropolitan area transport infrastructure • Improving the basic and advanced digital skills of citizens • Example project: Computer libraries • Investments in affordable housing • Increase the availability of integrated and high-quality healthcare services • Higher education reform • Example project: Modernising healthcare
MT	English	English	<p>No direct reference to disability in the summary Key measures of relevance might include:</p> <ul style="list-style-type: none"> • New electric buses for public transport

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<ul style="list-style-type: none"> • Free public transport to more than 100,000 Maltese citizens • Digitalisation of the public administration and public services • Better vocational education and training
NL		English	The Netherlands has not submitted a recovery and resilience plan so far, which will integrate the National Reform Programme
PL	National language	National language	No summary information published
PT	National language	National language	<p>The summary mentions disability with reference to social services.</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Improve the energy-efficiency of residential buildings • Extensions of the metro networks in Lisbon and Porto • Example project: Bus Rapid Transit system in Porto • Increase the digitalisation of medical records • Digital skill trainings and tailored coaching and support to adopt digital technologies for SMEs • Example project: Digitalisation of the Portuguese workforce • Increasing the supply of social housing solutions for various target groups • Extending the coverage of social services, including long-term care and actions for persons with disabilities • Modernisation of vocational education and training institutions • Example project: Support programme for access to housing
RO			No summary information published
SE	National language	English	No summary information published
SI	National language	National language	<p>The summary mentions disability with reference to social services.</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Renovation of buildings, including schools • Example project: Measures to increase up-take of public transport • Increase use of public e-services • Increasing digital skills • Example project: Digitalisation in education • Setting-up of a long-term care system • Access to more affordable housing for those in or close to poverty and social exclusion
SK	National language	National language	<p>The summary mentions disability with reference to social services.</p> <p>Key measures of relevance might include:</p> <ul style="list-style-type: none"> • Modernisation of railways • New cycling infrastructure • Creating integrated public transport systems in six regions.

MS	National Reform Programme	Stability / Convergence Programme	Recovery and Resilience Plan (summary initiatives)
			<ul style="list-style-type: none"> • Example project: Energy efficiency in family houses • Finance digital equipment, including for children from socially disadvantaged backgrounds, to enhance digital skills • Example project: Better services for citizens and businesses (e-government) • Improving the accessibility of primary care services • Modernisation of hospital buildings • Enhancing social and health care capacities through community- based solutions • Example project: Reform of the content and form of education

3 Update on EU and national disability strategies

In 2021 there were significant developments in disability strategy, which should be recognized and reflected in the Semester cycle – both at the EU and national level. The EU adopted its new strategy, following conclusion of the preceding ten-year initiative, and many of the Member States refreshed their own domestic disability action plans on similar timescales. In both cases, there has been an increased emphasis on alignment with the rights based global framework provided by the CRPD. The context of the EU strategy is summarised below, followed by updates on the status of national disability strategies and action plans in the Member States.

3.1 EU Strategy for the Rights of Persons with Disabilities

The EU Strategy for the Rights of Persons with Disabilities 2021-2030 was adopted by the Commission during the previous Semester period, in March 2021, following a period of open consultation. It built upon and strengthened the commitments made in the previous European Disability Strategy 2010-2020 and, like its predecessor, made specific commitments in relation to the European Semester. The Strategy was envisioned in the action plan of the European Pillar of Social Rights, under the goal of ‘inclusion of people with disabilities’ (Pillar principle 17) and linked disability equality with the wider social agenda on promoting diversity.³⁴ It calls for coordinated action at both national and EU level, with a strong commitment from Member States and regional and local authorities to deliver on the actions proposed, and also makes strong connections to implementation of the UN CRPD (under which the EU and states have parallel obligations).

The Strategy centres on three core themes of relevance to the Semester:

- EU rights (including support for free movement and political participation).
- Independent living and autonomy (including support to improve social services).
- Non-discrimination and equal opportunities (including equal access to health services and employment).

Specific commitments to mainstream disability equality in the Semester are highlighted as follows:

- ‘To ensure better labour market outcomes for persons with disabilities, the Commission will continue to support Member States in the implementation of the relevant Employment Guidelines through the European Semester, in developing statistical tools as well as promoting the exchange of best practices in the context of the Social Open Method of Coordination.’ – with a Flagship initiative planned for 2022 (pp. 10-11).
- ‘Based on more comprehensive data collection, the Commission will strengthen monitoring of disabilities in the context of the European Semester.’ (p. 28)

³⁴ European Commission (2021) *The European Pillar of Social Rights Action Plan*, <https://op.europa.eu/webpub/empl/european-pillar-of-social-rights/en/>.

Although the emphasis is on the Semester's strong focus on employment and labour market dynamics, it is important to consider that many of the other Strategy priorities are also very relevant to the Semester analysis, including:

- developing independent living and reinforcing community-based services;
- developing new skills for new jobs;
- fostering access to quality and sustainable jobs;
- consolidating social protection systems;
- equal access to social protection, healthcare, education and goods and services including housing;
- inclusive and accessible education;
- sustainable and equal access to healthcare.

These are all areas in which national experts and the Commission may wish to draw attention to the disability implications of policy developments and investment priorities when reporting on the Semester process in 2021-2022.

In addition, the Strategy emphasises the underpinning significance of accessibility and the role of EU funds in supporting strategic implementation, linking this to EU regulatory obligations to benefit from shared management funds and aligning the use of such funds with principles of the UN CRPD. It will be relevant in particular to analyse financing from the RRF from a disability perspective for consistency with EU disability strategy and CRPD (as shown earlier, Member States were encouraged to mainstream accessibility funding under the Recovery and Resilience Plans).

3.2 National disability strategies and action plans

In parallel with developments in EU disability strategy, several Member States launched or updated national disability strategies and action plans in 2020-2021, and this continued in 2021-2022. For example, new or amended strategies or action plans have been adopted during the current Semester period in Austria, Cyprus, Croatia, Ireland, Italy, Poland, Malta and Slovenia. In most cases, these plans align closely with national implementation of UN CRPD and in some cases refer also to EU level disability strategy. Previous strategy implementation periods have also expired in some Member States without so far being replaced, such as in Denmark, Greece, Latvia, The Netherlands or Sweden.

The main aim of this synthesis report is to monitor and to promote good practice in disability equality mainstreaming in the Semester co-ordination process. Ideally, the Member States' reform programmes should include disability policy planning using an integrated multi-level governance approach. Policy co-ordination should include linkages between NRP measures, relevant principles of the Social Pillar, the SDGs and the Scorecard, with investments identified in the RRP. From a disability perspective, it should recognize linkages between relevant NRP measures, domestic disability strategies, EU disability strategy and the CRPD.

For example, an NRP measure to bring more persons with disabilities into the labour market might be reported with reference to national disability strategy as well as to actions under Social Pillar Principle 17. It might refer to closing the disability

employment gap reported in the Social Scorecard and acknowledge funds allocated in the RRP. It might cross-reference elements of EU disability strategy or implementation of the CRPD. Despite the complexity of this task there is considerable evidence of progress in the 2022 Spring Package, with a substantially increased number of Member States (at least half) evidencing at least some acknowledgement of their national disability strategy in their NRPs.

The most recent information available about national disability action plans (DAP) in each country (reviewed May 2022) is summarised in Table 5 with links to sources. Where the plan is also mentioned in the 2022 NRP this is indicated.

Table 5: Status of national disability strategies and action plans in 2022

Country	National DAP	Details	NRP
AT	National Action Plan on Disability 2012-2020	In April 2022, the Ministry of Social Affairs submitted a draft of the new National Action Plan on Disability 2022-2030, drawn up as the national counterpart to the EU Disability Rights Strategy 2021-2030.	Yes
BE	Plan d'action fédéral handicap (2021-2024)	In 2021 the Council of Ministers invited the Minister for People with Disabilities to develop an interfederal disability strategy (2021-2030) and Federal Disability Action Plan (2021-2024). The Plan was adopted in July 2021 (Actieplan handicap / Plan d'action handicap). The plan includes 145 measures covering all aspects of life.	Yes
BG	National Strategy for Persons with Disabilities (2021-2030)	A new National Strategy for People with Disabilities 2021-2030 was adopted by the Council of Ministers in December 2020. An action plan for 2021-2022 was adopted by Decision № 741 of the Council of Ministers in October 2021. There is also a National Program for Accessible Housing and Personal Mobility of People with Disabilities.	No
CY	The First Cyprus Disability Strategy 2018-2028 and The Third Disability Action Plan 2021-23	The First National Strategy for Disability 2018-2028 was linked to the UN CRPD Committee recommendations to Cyprus, and the previous European Disability Strategy 2010-2020. A third National Disability Action Plan 2021-2023 was approved by the Council of Ministers in February 2022, including legislative and institutional reforms.	Yes
CZ	National Plan for the Promotion of Equal Opportunities for Persons with Disabilities for the Period 2021–2025	The National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2021–2025 was approved by government in July 2020, following broadly the structure of the UN CRPD. This includes 17 themes. An implementation report is evaluated every year. An English version is available.	Yes
DE	National Action Plan for the UN Convention on the Rights of Persons with Disabilities 2.0 (2016-2021)	The Federal Ministry of Labour presents a new disability action plan every five years. The second NAP covered the period to 2021 and addresses national implementation of the UN CRPD specifically.	No
DK	Policy statement and Action Plan for Disability Policy (2013, 2014, 2016)	A disability action plan was developed in 2013 and reviewed in 2014. A Disability Policy Statement was published by the Ministry of Social Affairs and the Interior in 2016. In 2019 the Department of Human Rights recommended the government to introduce a national disability action plan, following widespread demands from civil society.	No

Country	National DAP	Details	NRP
EE	Welfare Development Plan 2016–2023	Disability issues (as well as gender equality) were addressed in the broader Welfare Development Plan 2016–2023, which focuses on employment, social protection and support for independent living. In April 2021, the UN CRPD Committee recommended that Estonia 'Adopt a comprehensive disability strategy and a national action plan for implementing the rights of persons with disabilities in the Convention, across all government sectors and levels, in order to address attitudinal and environmental barriers that hinder participation of persons with disabilities in society'.	No
EL	Action Plan for the Rights of Persons with Disabilities	In 2019, the UN Committee recommended that Greece 'Develop a comprehensive, coherent and long-term national strategy and action plan for the implementation of the Convention, with clear timelines, benchmarks and budget allocations'. The government launched a National Plan of Action on the Rights of People with Disabilities at the end of 2020, following consultation.	Yes
ES	The Spanish Disability Strategy 2022-2030	In 2019, the UN Committee recommended Spain's adoption of an Action Plan for the previous disability strategy 2014-2020. A new Spanish Disability Strategy 2022-2030 was approved in May 2022. This addresses seven strategic challenges.	No
FI	National Program of Action of the UN Convention on the Rights of Persons with Disabilities 2020-2023	A National Action Plan on the UN CRPD was prepared for 2018-2019 by the Advisory Board for the Rights of Persons with Disabilities (VANE), following consultation. This was updated in a second plan for the period 2020-2023, comprising 110 measures.	Yes
FR	Interministerial policy priorities 2018-2023	An inter-ministerial strategy was adopted for the period 2018-2023, developed in five working groups. Policy responsibility is devolved to each Ministry under co-ordination of an Interministerial Committee (CIH), which means that there is no single disability policy document of reference.	No
HR	National Strategy of Equalisation of Opportunities for Persons with Disabilities 2021-2027	Following consultation, a new National Plan for Equalization of Opportunities for Persons with Disabilities 2021-2027 was adopted in December 2021, with a corresponding Action Plan for Equalisation of Opportunities for Persons with Disabilities for the period 2021-2024.	Yes
HU	Implementation of the National Disability Program 2022	The National Disability Program (OFP) was developed for the decade 2015-2025. The current Action Plan was adopted in 2020 for the period to 2022.	No
IE	National Disability Inclusion Strategy 2017-2021	A five-year national strategy was developed for the period 2017-2021, in preparation for ratification of the UN CRPD, with initial progress evaluated in 2019. There is a Comprehensive Employment Strategy for People with Disabilities 2015-2024 , and a National Housing Strategy for Disabled People 2022-2027 was published in 2022.	Yes
IT	The second biennial action program for the promotion of the rights and integration of	A process of biennial action programmes on disability rights was developed in 2009, with the most recent version legislated in 2017. Following public consultation and a National Conference on disability policies in December 2021 a third biennial action program is anticipated.	No

Country	National DAP	Details	NRP
	people with disabilities		
LT	Action Plan for the Social Integration of the Disabled for 2021-2023	A National Programme for the Social Integration of the Disabled 2013-2019 was adopted in 2012. The current Action Plan was approved in 2020 for the period 2021-2023.	No
LU	National action plan for the implementation of the Convention on the Rights of Persons with Disabilities 2019-2024	A National action plan for the implementation of the CRPD 2019-2024 was approved in December 2019, including 29 priorities, 55 objectives and 97 actions.	Yes
LV	Implementation Plan of the United Nations Convention on the Rights of Persons with Disabilities (2018-2020)	Guidelines for implementation of the UN CRPD were developed for the period 2014-2020. The most recent action plan was for 2018-2020, with a plan for creating accessibility 2019-2021.	No
MT	Freedom to Live, Malta's 2021-2030 National Strategy on the Rights of Disabled Persons	A National Policy on the Rights of Persons with Disability, was published in 2014. Following consultations a National Strategy on the Rights of Disabled Persons 2021-2030, Freedom to Live, was launched in September 2021.	Yes
NL	Unlimited participation! Implementation of the UN Convention on the Rights of Persons with Disabilities (2018-2021)	A revised UN CRPD implementation plan was developed in 2018 for the period 2018-2021 (and annexed to the initial state party report).	N/A
PL	Strategy for People with Disabilities (2021-2030)	A Disability Strategy for the period 2018-2030 was developed in 2018 and most recently updated in 2021. There is also the governmental programme Accessibility Plus 2018–2025 . An Annual Action Plan in Support of People with Disabilities for 2022 was also announced in November 2021.	Yes
PT	National Strategy for the Inclusion of People with Disabilities 2021-2025	National disability strategies were developed from 2011. Following consultation in 2020 the National Strategy for the Inclusion of Persons with Disabilities 2021-2025 was approved by resolution of the Council of Ministers in July 2021. This is structured around eight strategic axes.	Yes
RO	National Strategy on the Rights of Persons with Disabilities 2022-2027	Following a previous strategy period 2016-2020, a new draft strategy, for implementation of the UN CRPD was proposed in 2021. The National Strategy on the Rights of Persons with Disabilities 'A Fair Romania 2022-2027' and its Operational Plan were approved in April 2022. It includes 9 lines of action.	Yes
SE	National Goal and Focus on Disability Policy	A national strategy for disability policy was adopted in 2016, taking the UN CRPD as a starting point and with sectoral actions for the period 2017-2020. An inquiry to review the governance of disability policy reported in 2019 proposed that it become an integral part of human rights work. No new strategy has been developed.	No

Country	National DAP	Details	NRP
SI	Action Plan for Persons with Disabilities 2022-2030	A national action plan, based on UN CRPD implementation, was agreed in 2014 for the period 2014-2021. A new Action Programme for Persons with Disabilities 2022-2030 was published in November 2021, including 13 objectives.	No
SK	National Programme on Improving the living conditions of persons with disabilities for 2021-2030	A National Programme was developed for the period 2014-2020, based on implementation of the UN CRPD. This was updated with a new strategic programme for 2021-2030, with an action plan for the period 2021-2024.	No

4 Update on Member States' participation in the UN CRPD process

As shown earlier, the guidance on preparation of the RRP required Member States to report how their plans would conform with the UN CRPD in areas of policy relevance. It is therefore useful to look for synergies between the Semester reporting and CRPD reporting by each Member State, and for gaps and issues highlighted by the CRPD process that may be particularly relevant to the Semester reviews.

In preparation for this report, the status of each Member State in relation to the CRPD co-ordination process was checked against the UN Treaty database and verified with national experts where necessary. The extensive information collated here is then transposed into the reporting template for each country to assist the EDE national experts in monitoring the next Semester cycle.

In 2022, all of the EU Member States have now submitted at least one state report to the UN CRPD Committee, and most have progressed through at least one cycle of dialogue. The first to receive formal recommendations were Spain in 2011, Hungary in 2012 and Austria in 2013. Spain completed a second cycle, in 2019. Other Member States passed through the first CRPD reporting cycle at rate of three or four per year during this period. The latest to receive Concluding Observations were Estonia and France in 2021, and Hungary in 2022. A new list of issues for Italy was anticipated in 2022 (postponed).

This leaves four Member States still pending conclusion of a monitoring cycle. Finland and the Netherlands submitted their initial state reports in 2019 (due in 2018) and a List of Issues was raised with The Netherlands in 2022. Ireland submitted its initial report in 2021 (due in 2020) but a timetable for dialogue is not yet scheduled. Romania's initial state report was submitted in 2022 (nine years overdue). State reporting for subsequent monitoring cycles is also now overdue for some Member States, such as Cyprus, Czechia and Luxembourg (eight years since its initial report).

Table 6 summarises this progress, with links to recent sources of interest. Where recommendations or issues have been raised by the CRPD Committee concerning employment, social protection, health, education, or transitions to independent living these have been further extracted and transposed into the EDE Semester country fiches (as indicated in the sections that follow).

Table 6: Summary of progress in the CRPD review cycle

MS	Concluding Observations	Most recent state response	Most recent UN Committee response
AT	2013	2019	2018 List of Issues
BE	2014	2020	2019 List of Issues
BG	2018	2018	2018 Concluding Observations
CY	2017	2016	2017 Concluding Observations
CZ	2015	2014	2019 List of Issues
DE	2015	2019	2018 List of Issues
DK	2014	2020	2019 List of Issues
EE	2021	2019	2021 Concluding Observations

MS	Concluding Observations	Most recent state response	Most recent UN Committee response
EL	2019	2019	2019 Concluding Observations
ES	2019	2018	2019 Concluding Observations
FI	Not yet scheduled	2019	Not yet scheduled
FR	2021	2016	2021 Concluding Observations
HR	2015	2021	2020 List of Issues
HU	2022	2018	2022 Concluding Observations
IE	Not yet scheduled	2021	Not yet scheduled
IT	2016	2016	2016 Concluding Observations
LT	2016	2020	2016 Concluding Observations
LU	2017	2014	2017 Concluding Observations
LV	2017	2021	2017 Concluding Observations
MT	2018	2018	2018 Concluding Observations
NL	Not yet scheduled	2018	2022 List of Issues
PL	2018	2018	2018 Concluding Observations
PT	2016	2015	2016 Concluding Observations
RO	Not yet scheduled	2022	Not yet scheduled
SE	2014	2019	2018 List of Issues
SI	2018	2017	2018 Concluding Observations
SK	2016	2020	2019 List of Issues

Source: data from United Nations Human Rights Treat Body Database (May 2022)

It is worth noting that a large proportion of individual complaint cases brought to the UN CRPD Committee also come from EU Member States (15 out of 24 up to 2018, including in the United Kingdom).³⁵ Committee inquiries concerning systematic rights violations were also conducted in Hungary and Spain. The Hungarian case included allegations of inappropriate allocation of EU funds to expand institutionalisation.³⁶ The Spanish case focused on exclusion from the mainstream education system.³⁷

³⁵ UN OHCHR, Table of pending cases before the Committee on the Rights of Persons with Disabilities (CRPD), <https://www.ohchr.org/Documents/HRBodies/CRPD/Tablependingcases.pdf>.

³⁶ Committee on the Rights of Persons with Disabilities (2020) Inquiry concerning Hungary carried out by the Committee under article 6 of the Optional Protocol to the Convention, CRPD/C/HUN/IR/1, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fHUN%2fIR%2f1.

³⁷ Committee on the Rights of Persons with Disabilities (2018) Inquiry concerning Spain carried out by the Committee under article 6 of the Optional Protocol to the Convention, CRPD/C/20/3, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2f20%2f3.

4.1 Information recently requested from Member States by the UN

The kinds of information requested from States by the UN CRPD Committee are often very relevant to reporting policy gaps and plans in the Semester from a disability perspective (and correspond to issues of relevance in meeting the Sustainable Development Goals). The Commission may wish to pursue similar lines of enquiry in its own analyses or when encouraging the Member States to mainstream disability in Semester reporting (reminding the Member States that there is potential to reduce administrative burden if relevant disability information has been already assembled for the CRPD process). For this reason, it is helpful to briefly review the type of information requests raised in areas of employment, social policies and education in recent years.

4.1.1 Information about the labour market

The type of labour market information requested from Member States by the UN Committee is very relevant to Semester reporting, including quantitative information about the disability employment situation, programme participation and outcomes, and qualitative information about the measures taken. There have been both general and specific questions and the wording of these might provide useful prompts for Commission staff when seeking to improve reporting on disability and the labour market in the Semester reports. Table 7 shows the questions raised with Member States as reporting issues since 2017.

To summarise, the following key points are relevant also to reporting expectations in the Semester.

- Include disability and labour market participation statistics as a reporting minimum.
- Seek evidence of disability employment gaps, including gender gaps.
- Focus on active support for employment in the open labour market.
- Highlight persistent market segmentation failures (such as sheltered employment).
- Report measures to remove barriers to accessibility and adjustment in the workplace.
- Make direct references to national disability action plans and CRPD.

Table 7: Examples of employment information requested in the CRPD review process

MS	Source	Information requested on Employment (Article 27 CRPD and SDG Goal 8.5)
AT	2018 List of Issues	42. Please provide information on measures taken to enhance programmes for the employment of persons with disabilities in the open labour market and to narrow the employment and gender pay gaps. Please provide specific information on measures taken to promote the transition of persons with disabilities from sheltered employment to the open labour market. Furthermore, please provide information on measures taken to ensure that social insurance contributions are made for such persons.
BE	2019 List of Issues	25. Please provide information on measures taken to: (a) Enhance programmes to increase the employment rate of persons with disabilities, particularly women with disabilities, in both the private and the public sectors; (b) Facilitate the transition of persons with disabilities from unemployment or from employment in sheltered workshops to employment in the open labour market; (c) Tackle barriers and

MS	Source	Information requested on Employment (Article 27 CRPD and SDG Goal 8.5)
		discrimination against persons with disabilities in the recruitment process and the workplace, including instances involving a lack of reasonable accommodation.
CZ	2019 List of Issues	22. Please provide information on: (a) Employment rates among persons with disabilities, disaggregated by age, sex and impairment type, in both the open labour market and sheltered employment; (b) Measures taken to promote the employment of persons with disabilities in the open labour market, particularly through the prohibition of discrimination on multiple or intersectional grounds, in accordance with Council Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation; (c) The availability of supported employment programmes and vocational and professional rehabilitation programmes, as outlined as an objective in the National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2015-2020, especially with reference to the availability of work in rural and urban areas; (d) Whether some persons with disabilities (those considered as having the third degree of disability) can still only register as 'interested for work' and not as 'job seeking', and on the reasons for such a distinction.
DE	2018 List of Issues	28. Please provide information on: (a) The policies and achievements since the previous concluding observations aimed at increasing the employment rate of persons with disabilities in the open labour market in the public and private sectors, including specific measures and vocational training; (b) The appointees responsible for the monitoring and evaluation of the system regarding the right to work and employment; (c) The number of workers with disabilities currently recruited and employed on a permanent basis by private sector companies since the application of the Federal Participation Act in 2017; (d) The accessibility of workplaces, including statistical information and information on the legal measures and complaint mechanisms with safeguards, and effective sanctions for non-compliance with binding laws and policies, such as quotas; (e) The transition from unemployment or employment in sheltered workshops to open employment for persons with disabilities, the incentives available for employers, and statistics on the percentage of workers with disabilities that make the transition to the general labour market; (f) The meaningful involvement, consultation and representation of organisations of persons with disabilities in labour-related matters.
DK	2019 List of Issues	25. Please provide: (a) Information on measures taken to significantly increase the percentage of persons with disabilities working in the open labour market in Greenland and to close the employment gap for persons with disabilities; (b) Information on measures to combat prejudices preventing persons with disabilities from accessing the labour market; (c) Statistics and data for the reporting period under review, comparable on an annual basis, on the status of persons, with or without disabilities, with regard to unemployment, underemployment and multiple employment, and on persons not currently involved in any form of education, employment or training, disaggregated by sex, age, ethnicity, urban or rural residence and family status.
HR	2020 List of Issues	25. Please provide information on the efforts made to eliminate stigma, barriers and discrimination in the recruitment process and the steps undertaken to increase the employment of persons with disabilities in the open labour market in both the public and private sectors. Please also elaborate on: (a) The status of development of an action plan for the employment of persons with disabilities; (b) Results achieved through the implementation of the new Vocational Rehabilitation and Employment of Disabled Persons Act (2015), including data; (c) The sanctions taken for non-compliance of mandatory quotas and for the denial of reasonable accommodation.
HU	2017 List of Issues	31. Please inform the Committee about measures taken to implement effectively the disability-specific provisions of the Labour Code and the principle of equal remuneration for work of equal value, and to develop programmes to increase employment opportunities for women and men with disabilities in the public and private sectors and their inclusion in the open labour market.
NL	2022 List of Issues	25. Please provide information on: (a) Employment rates among persons with disabilities, disaggregated by age, sex and impairment type, in both the open

MS	Source	Information requested on Employment (Article 27 CRPD and SDG Goal 8.5)
		labour market and sheltered employment, as well as on unemployed persons with disabilities; (b) Measures taken to promote inclusive employment of persons with disabilities in the open labour market, including the quota system that was initiated in 2018, and on measures taken to ensure that reasonable accommodation is provided to persons with disabilities in the workplace and in the open labour market; (c) The definition of 'people with occupational disabilities' as mentioned in paragraph 291 of the State party report; (d) Measures taken to reduce the unemployment rate of persons with disabilities and to narrow the gender pay gap faced by women with disabilities.
SE	2018 List of Issues	20. Please provide information about: (a) Progress made in promoting employment opportunities for persons with disabilities, including psychosocial disabilities, in the public and private sector, including as a result of the measures taken in the Budget Bill 2016 aimed at assisting persons with disabilities in obtaining work; (b) The rate of employment of persons with disabilities compared with that of persons without disabilities, disaggregated by occupation; (c) Targeted measures to reduce the vulnerability of persons with disabilities to unemployment, including temporary special measures and the strengthening of financial incentives for employers, such as tax incentives; (d) Measures taken to reduce the unemployment rate of and gender pay gap faced by women with disabilities; (e) Steps taken to support persons with disabilities in exercising their right to freely choose or accept employment in work environments that are open, inclusive and accessible to them, particularly the right to freely chosen work in the labour market; (f) Measures taken to review the use in the labour market of the term 'persons with reduced capacities or limitations'.
SK	2019 List of Issues	26. Please provide information on the measures taken to increase the employment rate of persons with disabilities, particularly women with disabilities, in the open labour market, and on the national targets for creating employment opportunities for persons with disabilities. Please also provide information on measures taken to: (a) Ensure the transition of persons with disabilities, including those in the process of moving from institutions into the community, from unemployment or employment in sheltered workshops to employment in the open labour market; (b) Eliminate barriers and discrimination against persons with disabilities in the recruitment process and the workplace, including instances involving the denial of individualized measures.

4.1.2 Information about social policies and healthcare

Following a similar pattern, from the available cases of reporting issues raised by the UN CRPD Committee, there are a number of examples relevant to Semester reporting concerning social policies and health care. The most relevant examples are those raised under Articles 28, 25 and 19 CRPD, relating to social protection, health and independent living, respectively. As with the examples of labour market information, these may be helpful for Commission staff in suggesting lines of analysis or clarification concerning Member States' reporting in the semester process too, from a disability perspective.

To summarise, the type of information requested by the UN Committee on standard of living and social protection highlights the need also in the Semester to:

- Include disability poverty and social protection statistics as a reporting minimum.
- Seek evidence of disability poverty gaps, including gender gaps and child poverty.
- Distinguish outcomes for people with severe levels of impairment and different age groups.
- Consider both income maintenance and additional disability costs compensation.
- Highlight failures in social protection schemes (including disability assessment processes).
- Make links between national poverty reduction strategies and disability action plans.

Table 8: Examples of social protection information requested in the CRPD review process

MS	Source	Information requested on standard of living and social protection (Article 28 CRPD)
BE	2019 List of Issues	26. Please describe measures taken to: (a) Mainstream disability in poverty and homelessness reduction strategies. Please focus in particular on the situation of women, children and older persons with disabilities; (b) Ensure that social protection and support services are provided to persons with disabilities, taking into account additional costs related to disability; (c) Eliminate the current backlog of applications for social protection measures to the Directorate-General for Persons with Disabilities of the Federal Public Service for Social Security.
CZ	2019 List of Issues	23. Please provide information on measures taken to: (a) Revise benefit and pension legislation and policy concerning persons with disabilities and their families, in particular to bring the concept of disability and the assessment criteria used to calculate social protection entitlements, such as the disability pension, into line with the Convention; (b) Reintroduce the additional social allowance to bring the standard of living of families with children with disabilities above subsistence level.
DE	2018 List of Issues	29. Please provide information on: (a) The social protection measures for persons with disabilities, especially families of children or parents with disabilities, to eliminate the additional costs related to disability; (b) The measures to mainstream women, youth and children with disabilities from families at risk of poverty or living in poverty in national poverty-reduction strategies; (c) The effect on claims for integration assistance benefit from persons with disabilities following the adoption of the Federal Participation Act; (d) Equal and comparable social and support services for persons with disabilities regardless of age, especially for adults with disabilities over the age of 65; (e) The measures to address insufficient accessible and affordable housing, especially in densely populated urban areas.
DK	2019 List of Issues	26. Please provide information on: (a) The early retirement reform under Act No. 574 of 2014 amending the Act on Social Pensions and any impact assessments carried out on persons with disabilities under the age of 40 for accessing early retirement pension; (b) Measures adopted to grant non-contributory pensions to persons with disabilities, including those who require more intensive support; (c) Assessments of the impact that the ceiling on entitlements provided under the social security system has had on the living conditions of persons with disabilities, including information on disproportionate impact in relation to type of impairment, gender and age; (d) Persons with disabilities who have been awarded early retirement pensions since the entry into force of the early retirement pension regime; on the household income levels of persons with disabilities, compared with those of the general population since 2014; and on persons with disabilities receiving compensation under the Danish unemployment insurance scheme, in the form of disaggregated data.

MS	Source	Information requested on standard of living and social protection (Article 28 CRPD)
HR	2020 List of Issues	<p>26. Please inform the Committee about the efforts made to develop a disability assessment that fully incorporates a human rights model of disability and whether the design of the disability assessment method has been undertaken in a systematic, consistent and transparent manner through the participation of organizations of persons with disabilities.</p> <p>27. Please elaborate on the measures to combat poverty among persons with disabilities, in particular among persons with disabilities of Roma origin and in rural and remote areas. 28. Please provide information on: (a) The measures taken to implement the provisions of the Social Benefit Act in order to ensure its full enjoyment by persons with disabilities, irrespective of the cause of their impairment, in all counties and municipalities; (b) The provisions of the social protection schemes to ensure that all persons with disabilities are provided with support for equipment, such as hearing aids, mobility aids and assistive technologies; (c) The steps taken by the State party to increase pension, social welfare and other benefits for both civilian and veteran persons with disabilities throughout the country, including for parents of children with disabilities.</p>
HU	2017 List of Issues	<p>32. According to information before the Committee, the disability pension system was replaced in 2012 by a disability benefit scheme. Please provide detailed information on the disability benefit scheme. Please specify any steps taken towards bringing assessment of disability and the necessary benefits fully into line with the Convention. Please also provide information on any earmarked compensation schemes with regard to disability-related extra expenses incurred by persons with disabilities and their families.</p>
NL	2022 List of Issues	<p>26. Please provide information on measures taken to: (a) Include disability in the collection and publication of data concerning poverty and social protection, disaggregated by sex, age, level of education, ethnicity and national origin, type of impairment and type of residence; (b) Tackle the income inequality faced by persons with disabilities; (c) Address homelessness among persons with psychosocial disabilities.</p>
SE	2018 List of Issues	<p>21. Please provide information about: (a) The extent to which the 'guaranty benefit' adequately covers the living costs of persons with disabilities, including for food, accommodation, transport, rehabilitation and medical care, and any existing differences among municipalities; (b) How recent reforms in the national insurance system have improved the living conditions of persons with disabilities; (c) Measures taken to reduce poverty among persons with disabilities.</p>
SK	2019 List of Issues	<p>27. Please inform on the measures taken to: (a) Mainstream disability inclusion in strategies to address poverty, with a particular focus on the policies addressing the situation of women, children and older persons with disabilities; (b) Develop public housing programmes that are accessible to and affordable for persons with disabilities, on an equal basis with others; (c) Ensure that all social protection schemes and support services are provided to persons with disabilities without discrimination related to age, gender or socioeconomic status, and ensure the coverage of disability-related extra costs and disability-related schemes after the age of 65 years; (d) Collect statistical data on poverty, disaggregated by disability, age, gender, place of residence and geographical location, and provide the Committee with the available figures.</p>

The types of information requested by the UN CRPD Committee on health and rehabilitation include questions about policy measures and access to, and affordability of, health care systems for persons with disabilities. These are very relevant to Semester reporting on these issues. There have been questions about staff training and about the accessibility of health information. Nevertheless, the CRPD Committee has requested rather less information about evidence of unmet health needs than might be available in the Semester, from national or EU data sources. The available

examples predate the COVID-19 crisis and the issues raised are amplified by its differential impact on persons with disabilities.

In summary, Member States should be able to:

- Include disability health access statistics as a reporting minimum (e.g. using unmet needs).
- Evidence of the differential impact of health crises on persons with disabilities (e.g. in institutions).
- Report measures taken to increase accessibility and preparedness in health care settings.
- Assess whether persons with disabilities face additional health care cost barriers.
- Highlight failures in health services (e.g. involuntary treatment or institutional detention).
- Make links between national health strategies and national disability action plans.

Table 9: Examples of health care information requested in the CRPD review process

MS	Source	Information requested on health (Article 25 CRPD)
BE	2019 List of Issues	23. Please provide information on measures taken to: (a) Ensure that health-care facilities and services, including specialist services, are accessible and affordable to all persons with disabilities; (b) Train health professionals and support personnel on the human rights model of disability and on measures taken to end discriminatory and negative attitudes towards and the stereotyping of persons with disabilities, particularly persons with psychosocial or intellectual disabilities.
CZ	2019 List of Issues	21. Please provide information on measures taken to: (a) Train and raise awareness among health-care professionals on the rights of persons with disabilities; (b) Ensure that information and communications regarding health-care services are available in accessible formats to all persons with disabilities, including persons with intellectual disabilities and persons who are blind or deaf, in both urban and rural communities; (c) Provide access to full health-care and rehabilitative services, including sexual and reproductive health services, for persons with disabilities in their communities.
DE	2018 List of Issues	25. Please explain the initiatives taken to ensure affordable, full and equal access to health-care facilities and services for persons with disabilities, including within the local community, in the light of existing stipulations in the Social Code, particularly section 63b, paragraph 4, of Book XII. 26. Please clarify: (a) Whether health information and education is available in all accessible formats; (b) The measures to train health professionals and support personnel on the human rights-based approach to disability, and to avoid discriminatory and negative attitudes and stereotyping against persons with disabilities, particularly persons with psychosocial or intellectual disabilities; (c) The safeguards that exist to ensure that medical procedures performed on persons with disabilities are carried out with their free and informed consent, particularly on women and girls with disabilities, including effective monitoring and appeal mechanisms for infringements; (d) The terms on which persons with disabilities can be denied access to private health insurance in, for example, section 19 of the General Anti-Discrimination Act (CRPD/C/DEU/1, para. 213) and to what extent expenses related to a disability or an impairment are covered through the statutory health insurance system. Please describe any differences at the national and Land levels.
DK	2019 List of Issues	23. Please provide information on: (a) Measures to improve access to health facilities and services used by persons with disabilities, including sexual and reproductive health-care services and cervical cancer screening for women with disabilities, women with cerebral palsy and women with intellectual disabilities; (b)

MS	Source	Information requested on health (Article 25 CRPD)
		Measures to reduce the high mortality rates among persons with psychosocial disabilities, including through early detection and health checks; (c) Measures to ensure coverage of hearing aid treatment by the health-care system; (d) Measures taken to meet the transport requirements of persons with disabilities in accessing health-care facilities and to provide emergency facilities for persons with psychosocial disabilities in the Faroe Islands.
HR	2020 List of Issues	24. Please provide information on: (a) The efforts undertaken to provide for persons with disabilities to have access to health insurance and services on an equal basis with others, including public and private health services and equipment that are affordable, accessible and of good quality; (b) The measures taken for training health professionals and support personnel to raise awareness of the human rights model of disability; (c) Whether mental and psychosocial health services, including sexual and reproductive health services, are accessible for women and girls with disabilities in both urban and rural areas.
HU	2017 List of Issues	29. Please inform the Committee about the steps taken towards providing accessible, gender-sensitive, mainstream and quality public health-care services, including accessibility to public health-care facilities and the equipment used therein throughout the entire State party and on an equal basis with others. In view of the concern expressed by the Committee on the Elimination of Discrimination against Women in its previous concluding observations, namely, that women with disabilities are excluded from gynaecological and breast-screening tests and about the limited access to and inadequate quality of sexual and reproductive health services for women with disabilities (see CEDAW/C/HUN/CO/7-8, para. 32), please indicate whether any steps have been made to ensure the access by women with disabilities to quality sexual and reproductive health services, and all screening tests on an equal basis with others. 30. Please inform the Committee about any mandatory and systematic training of health-care professionals on human rights of persons with disabilities.
NL	2022 List of Issues	24. Please provide information on measures taken to: (a) Ensure access for all persons with disabilities to health care, including gynaecological, dental and other health-care services, facilities, amenities and equipment, including through the provision of specific accessible amenities and equipment for women and girls with disabilities; (b) Reduce the waiting time necessary to access health-care services, in particular for persons with psychosocial disabilities; (c) Facilitate training and the promulgation of an ethical standard for health-care professionals, with a view to providing health-care services for persons with disabilities that are of the same quality as those provided to others, including through raising awareness of the human rights, dignity, autonomy and requirements of all persons with disabilities.
SE	2018 List of Issues	18. Please provide information about: (a) The availability of psychiatric services, including outpatient treatment, and of specialized psychiatric personnel throughout the territory of the State party, disaggregated by municipality; (b) Measures taken to promote access to health-care services for women and girls with disabilities, including sexual and reproductive health services, and information on HIV/AIDS, on an equal basis with others.
SK	2019 List of Issues	24. Please provide information on measures taken to: (a) Ensure that health-care facilities, services and equipment, including specialist services, are accessible and affordable to all persons with disabilities, in particular persons requiring high levels of support; (b) Train health professionals and support personnel on the human rights model of disability, and prevent discriminatory and negative attitudes and stereotypes against persons with disabilities, particularly with regard to persons with intellectual or psychosocial disabilities; (c) Ensure equal access to sexual and reproductive health information and services for women and girls with disabilities.

Progress on deinstitutionalisation and support for independent living is a third key area of CRPD reporting relevant to reporting on social inclusion policies in the Semester. In this respect, the UN CRPD Committee has provided extensive interpretation and

elaboration of expectations in its General Comment.³⁸ Observations on deinstitutionalisation from the Commission, including strong links to structural fund regulation, have been very helpful in reinforcing these obligations arising from the CRPD. In addition, the types of information requested by the UN Committee on this theme provide some useful pointers for Commission staff in seeking clarification from Member States through their Semester or structural funds monitoring processes. For example, there is a distinct lack of robust comparative data about the numbers of persons with disabilities supported in institutions or in the community (although some structured reporting of national administrative data on long term care does exist).³⁹

In summary, Member States should be able to:

- Describe the concrete steps taken to progress deinstitutionalisation.
- Evidence of the situation of people living in institutions as well as those living in the community.
- Account for the use of EU funds in relation to transition from institutional to community living.
- Assess the effectiveness of support for independent living, including personal assistance schemes.
- Highlight failures or bottlenecks in the process of deinstitutionalisation.
- Make links between national health strategies and national disability action plans.

Table 10: Examples of independent living information requested in the CRPD review process

MS	Source	Information requested on independent living (Article 19 CRPD)
AT	2018 List of Issues	37. Please provide information on measures taken, including the provision of adequate funding, to enable the diversity of persons with disabilities to enjoy their right to freely choose their residence on an equal basis with others and to access a full range of in-home and other community services for daily life, including personal assistance.
BE	2019 List of Issues	18. Please provide information on: (a) Steps taken to implement disability action plans at the federal, regional and community levels to ensure that persons with disabilities enjoy the right to independent living and to be included in the community, and to implement plans to eliminate waiting lists for access to personal assistance budgets and other services and support; (b) Steps taken to implement an effective deinstitutionalization strategy, with a clear time frame, for all persons living in institutions. Please include the number of persons with disabilities who have been deinstitutionalized so far, and provide details of their current situation; (c) Measures taken to enable all persons with disabilities to enjoy their right to freely choose their residence on an equal basis with others, and to access a full range of in-home and other community services for day-to-day living, including personal assistance; (d) The use of European Structural and Investment Funds and national funds for personal assistance and independent living. Please include precise data, in absolute and relative numbers, on the funds provided.
CZ	2019 List of Issues	16. Please provide information on: (a) Steps taken to achieve deinstitutionalization, including details on the time frame within which the full deinstitutionalization of all persons with disabilities (particularly children under 3 years of age, persons with

³⁸ Committee on the Rights of Persons with Disabilities (2017) *General comment No. 5 (2017) on living independently and being included in the community*, CRPD/C/GC/5, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/5.

³⁹ OECD statistics on Long-Term Care Resources and Utilisation, https://stats.oecd.org/Index.aspx?DataSetCode=HEALTH_LTCR.

MS	Source	Information requested on independent living (Article 19 CRPD)
		intellectual or psychosocial disabilities and older persons with disabilities) will be achieved; (b) The use of financial resources, including European Structural and Investment Funds, and on the transition plans to enable persons with disabilities to freely choose their living arrangements in the community. Please provide an update on the completion of actions to support independent living, as set out under objectives 6.1 to 6.15 of the National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2015-2020; (c) The availability and accessibility of community-based services for persons with disabilities, including housing services, an open labour market, social services and human rights-based mental health care. Please indicate whether coverage of these services is sufficient and detail measures to ensure their sustainability.
DE	2018 List of Issues	<p>18. Please provide information, at the national and Land levels, on the legal, policy and other measures — and, when appropriate, their specific time frames for implementation — that have been adopted to: (a) Ensure sufficient, sustainable and long-term funding and support, including a sufficient number of accessible and affordable housing options, for individualized independent living within the community at national, Land and municipal levels; (b) Expedite deinstitutionalization, particularly for persons with intellectual disabilities; (c) Ensure equal access to long-term care insurance benefits for persons with disabilities currently living in communal housing provided by the integration assistance services and describe the measures taken to guarantee their free choices to live independently and be included in the community; (d) Provide personal assistance services based on an assessment of the characteristics, circumstances and requirements of persons with disabilities and whether the type of impairment, or a person's income or that of his or her family can affect this assessment. Please specify any differences in such provisions at national and Land levels.</p> <p>19. Please provide information on the initiatives planned to ensure full freedom of movement and inclusion in the community of persons with disabilities, in line with the judgment of the European Court of Justice in the case C-679/16.</p> <p>20. Please provide data, at the Land and municipal levels, on the number of persons with disabilities below the age of 60 living in residential and nursing homes for the elderly, disaggregated by age, impairment and sex.</p>
DK	2019 List of Issues	<p>18. Please provide information on measures taken to: (a) Recognize the individual right of persons with disabilities to live independently and to be included in the community, and to ensure that they can freely make choices regarding their living arrangements, including in living areas and facilities that are currently under the control of public authorities and not open to the public; (b) Prevent the development of institutionalized living environments, including measures to end the building of and investment in large-scale closed institution-like residences (CRPD/C/DNK/CO/1, para. 43); (c) Repeal sections in the Consolidation Act on Social Services of 2015, as amended in 2017, that permit the forced relocation of persons with disabilities to assisted living facilities, thus denying them the opportunity to choose their place of residence; (d) Provide persons with disabilities with individualized support for independent living based on individual assessments at the municipal level, with disaggregated data about access to personal assistance and in-kind or in-cash forms of support, including personal budgets; (e) Adopt strategies and allocate resources to ensure accessible housing for persons with disabilities in all housing sectors in the Faroe Islands.</p>
HR	2020 List of Issues	<p>19. In reference to the Committee's previous concluding observations (CRPD/C/HRV/CO/1, para. 30), please inform the Committee about: (a) The personal assistance and community-based services available to persons with disabilities who require them; (b) The progress made with respect to the operational plan for deinstitutionalization, particularly in the case of persons with intellectual or psychosocial disabilities in 24-hour living spaces, in psychiatric hospitals, those living in family homes for more than 20 persons and those living in adult foster families.</p> <p>20. Please provide information on whether the use of the European Union structural and investment funds is directed to deinstitutionalization and ensuring</p>

MS	Source	Information requested on independent living (Article 19 CRPD)
		independent living in the community for persons with disabilities. Please inform the Committee about: (a) The provisions made to ensure their active participation in decision-making, including for the exercise of their choice regarding with whom, how and where to live; (b) The steps taken to amend the Social Welfare Act to prohibit a guardian from having the authority to place a person in any institution or in any other living arrangement without that person's consent; (c) The allocation of personnel, technical and financial means for support services enabling independent life and community inclusion at the national and local level.
HU	2017 List of Issues	24. Please provide updated information on the status of the deinstitutionalization process. Please inform the Committee about effective measures taken to ensure that an adequate level of funding is made available to effectively enable persons with all types of disabilities to: (a) enjoy the freedom to choose their residence on an equal basis with others; (b) have access to a full range of in-home and other community services for daily life, including personal assistance, instead of congregate care; and (c) are provided with the necessary reasonable accommodation, with a view to supporting their inclusion in their local communities. 25. Please inform the Committee about the use of the European Union structural funds and national funds, including reallocation of those structural funds provided to residential institutions, including 'small home communities', and financial resources provided to personal assistance and other support services in local communities, including support for the de-institutionalization of boys and girls with disabilities.
NL	2022 List of Issues	17. Please provide information on: (a) Steps taken to develop a deinstitutionalization policy, including details on the time frame within which the full deinstitutionalization of all persons with disabilities, in particular children with disabilities, persons with intellectual disabilities and persons with psychosocial disabilities, will be achieved, and measures to facilitate their full inclusion and participation in the community; (b) The availability of housing and the extent to which it ensures the right of persons with disabilities to freely choose their living arrangements in the community and their right to choose where and with whom to live, including for persons placed under substitute decision-making regimes; (c) Measures taken to ensure that personal assistance programmes provide persons with disabilities, including persons who are still under substitute decision-making regimes, with sufficient financial assistance to allow them to live independently in the community, and to ensure that the differences in criteria applied by municipal authorities are reduced to a minimum; (d) The number of persons with disabilities, including children with disabilities, who are still living in residential institutions.
SE	2018 List of Issues	13. Please provide information about: (a) Measures taken to ensure that personal assistance programmes provide persons with disabilities with sufficient financial assistance to allow them to live independently in the community, and the criteria to be eligible for personal assistance; (b) Measures taken to provide persons with disabilities with the opportunity to choose their place of residence, and where and with whom they want to live, on an equal basis with non-disabled persons; (c) Measures taken to ensure that decisions granting individual support are implemented promptly by the municipalities; (d) The number and percentage of persons with disabilities who have received personal assistance benefits since 2014, disaggregated by year, sex, age, type of impairment and municipality of residence.
SK	2019 List of Issues	19. With reference to the Committee's previous concluding observations (paras. 56 and 58), please provide information on: (a) Progress made in the deinstitutionalization process of persons with disabilities, as evidenced by data disaggregated by age, sex and ethnicity, as well as on persons who have been deinstitutionalized and on the number of persons who have regained their legal capacity as a result of the deinstitutionalization process; (b) Individualized supports, such as personal assistance, available to persons with disabilities, including those deinstitutionalized in the last five years, who live in the community, and on the personnel and the technical and financial means allocated to such support services at the national and local levels; (c) Measures taken to prevent the

MS	Source	Information requested on independent living (Article 19 CRPD)
		reinstitutionalisation of persons with disabilities, including older persons with disabilities in small congregated settings, such as group homes; (d) Measures taken to redirect budget allocations for institutions, including those allocations from the European Structural and Investment Funds, towards initiatives that provide support for inclusion in the community, and to ensure accessibility of mainstream community services at the municipal level. Please provide information about any national targets to increase accessibility of community services and on the indicators of progress.

4.1.3 Information about education and training

As in the case of independent living, outlined earlier, the UN Committee has provided extensive interpretation of state obligations in its General Comment on the right to inclusive education.⁴⁰ Both this interpretation and the types of information requested from states by the Committee focus mainly on children in the school system and less on the aspects of skills and training prioritised in the Semester reporting. Nevertheless, the questions they raise can be usefully applied to all stages of learning.

To summarise, the following key points are relevant also to reporting expectations in the Semester.

- Disaggregate statistical data on educational participation by disability status as a reporting minimum.
- Highlight systemic failures in the education system (such as segregative barriers).
- Focus investment on active support measures for learners with disabilities in inclusive settings.
- Consider the training and preparedness of staff to include learners with disabilities.
- Make connections between national skills strategies and national disability action plans.

Table 11: Examples of education information requested in the CRPD review process

MS	Source	Information requested on education (Article 24 CRPD and SDG 4)
AT	2018 List of Issues	41. Please provide information on the funding available to provide reasonable accommodation for students with disabilities based on individual requirements, to provide students with disabilities with the support they require within the mainstream education system, and to continue training teachers and all other educational and non-teaching staff to accommodate quality inclusive educational settings, in line with general comment No. 4 (2016) on the right to inclusive education. Please indicate what measures are taken to promote and encourage the training and hiring of teachers with disabilities. Please provide information on measures taken to implement targets 4.5 and 4 (a) of the Sustainable Development Goals.
BE	2019 List of Issues	22. Please provide information on: (a) Steps taken to adopt and implement a coherent and inclusive education strategy, in all communities of the State party, to

⁴⁰ Committee on the Rights of Persons with Disabilities (2016) *General comment No. 4 (2016) on the right to inclusive education*, CRPD/C/GC/4, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/4.

MS	Source	Information requested on education (Article 24 CRPD and SDG 4)
		transform the parallel-track education system, which includes special education, into a quality, inclusive system that provides support in the mainstream system for all children with disabilities, including children with intellectual disabilities. Please include information on the benchmarks, baselines and indicators used for the strategy, and on the resources allocated to its implementation; (b) The financial, material and human resources available to provide individualized support for students with disabilities, and on the applicable accessibility standards within the framework of inclusive education; (c) Measures taken to promote and encourage the training and hiring of teachers with disabilities.
CZ	2019 List of Issues	20. Please provide updated information on: (a) The implementation of the amended School Act (Act No. 561/2004 Coll., amended by Act No. 82/2015 Coll.) to ensure the right to inclusive education; (b) The allocation of financial, technical and human resources to ensure the right of all children with disabilities, including Roma children with disabilities, to a high-quality, inclusive education, and to provide teachers with training that fosters inclusive education, in both rural and urban settings, with Braille and sign language interpretation made available; (c) Efforts to transform segregated education into an inclusive education environment in both urban and rural areas, particularly for persons with intellectual disabilities or autism and deafblind persons. Please also provide an update on the achievement of objectives 10.1 to 10.32 of the National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2015–2020.
DE	2018 List of Issues	24. Please provide information on: (a) The efforts and time frames to ensure that all professionals within and around the education system are sufficiently aware of and receive adequate training to contribute to high-quality inclusive education; (b) The identifiable resources available to ensure adequate staff, supervision and training to guarantee support for students with disabilities in mainstream schools, including higher education and sports activities; (c) The efforts to promote the employment of teachers and assistants with disabilities in mainstream schools; (d) The education establishments that have been transformed into inclusive settings since 2009 (number/percentage/types); (e) The Länder that guarantee the right of persons with disabilities to attend mainstream schools with reasonable accommodation as a legal entitlement with safeguards.
DK	2019 List of Issues	22. Please provide information on: (a) Measures taken to include all children with disabilities in the inclusive education system, including in compulsory education, and to provide the required support and accommodation, in particular for autistic children and children requiring high levels of support; (b) Steps taken to train teachers and other members of school staff and to equip them with inclusive education skills, methodological knowledge and expertise to facilitate access by pupils with disabilities to inclusive education, and on the human, technical and financial resources provided to schools, including in Greenland and the Faroe Islands; (c) Measures to tackle the low educational outcomes of persons with disabilities, including in vocational training; (d) The number and percentage of children with disabilities with access to inclusive quality education, disaggregated by age and sex, type of impairment, type of school and municipality; (e) Awareness-raising and the effective dissemination of the Committee's general comment No. 4 (2016) on the right to inclusive education among professionals, in close partnership with representative organizations of persons with disabilities.
HR	2020 List of Issues	47. The Committee recommends that the State party formulate a comprehensive inclusive education policy with strategies for promoting a culture of inclusion in mainstream education, including individualized human-rights based assessments of educational requirements and necessary accommodation, support for teachers, respect for diversity in ensuring the rights to equality and non-discrimination, and the full and effective participation of persons with disabilities in society.'
HU	2017 List of Issues	23. Please provide information on the measures taken to ensure that all students with disabilities have access to inclusive education, in both rural and urban areas, in line with the recommendation in 2012 of the Ombudsperson to ensure conditions for children and youth with disabilities to have quality education in schools throughout the State party. Please also provide information on: (a) The number of

MS	Source	Information requested on education (Article 24 CRPD and SDG 4)
		children with disabilities enrolled in inclusive mainstream schools, in special schools and in other segregated school units at all levels of education, disaggregated by sex, national or ethnic origin, impairment and urban or rural settings and trends since the last review of the State party by the Committee; (b) The human, technical and financial resources allocated to providing individualized support to students with disabilities to ensure equal access to the learning environment; (c) The steps taken to promote and ensure the training and hiring of teachers with disabilities and the training of teachers in sign language, orientation and mobility skills in mainstream schools.
NL	2022 List of Issues	22. Please provide information on: (a) Plans to discontinue the dual education system and implement the inclusive education system, and plans to build a strategy with clear targets and an allocated budget for inclusive education for all children with disabilities; (b) Plans to recognize the denial of access to education in general schools for a child with disabilities as a form of discrimination; (c) Measures taken to ensure access for all children with disabilities to general schools in their communities, and to ensure the necessary support, in particular the provision of reasonable accommodation, for children with disabilities in the general education system; (d) Measures taken to ensure access to inclusive tertiary education, including vocational and higher education, for children and adults with disabilities; (e) Training provided to general education teachers on the rights of children with disabilities to inclusive education, and on inclusive education methods and augmentative and alternative modes, means and formats of communication, education techniques and materials; (f) Data, disaggregated by age, sex and type of impairment, on children with disabilities in special education settings, including in special education schools and special education classes within the general education system, as well as on children with disabilities in the general education system.
SE	2018 List of Issues	28. Please explain in detail how the State party is working towards providing quality inclusive education at all levels of the education system with a view to fully replacing all forms of special education with inclusive education. In particular, please provide information about effective measures to: (a) ensure that an adequate level of funding is made available to provide reasonable accommodation to children with disabilities on the basis of the student's individual requirements, including with regards to school transportation; (b) provide students with disabilities with required support within the general education system, including with a view to ensuring that they do not leave school earlier than their peers without disability; (c) ensure the full inclusion of Roma children with disabilities into the mainstream education system; and (d) continue training teachers and all other educational staff to enable them to work in inclusive educational settings. Please inform the Committee about measures to implement targets 4.5 and 4 (a) of the Sustainable Development Goals.
SK	2019 List of Issues	17. Please provide information about: (a) Measures taken to include all children with disabilities in their nearest mainstream education school and ensure the availability of the necessary support; (b) Steps taken to abolish the provision of the Education Act allowing schools to deny a place to pupils with disabilities when taking them would involve significant organizational or financial difficulties, and to allocate sufficient human, technical and financial support to schools; (c) The number and percentage of children with disabilities with access to education, disaggregated by age and sex, type of impairment, type of school, and municipality.

4.2 UN Recommendations to Member States

The EDE country fiches include relevant extracts from the UN CRPD Concluding Observations to each Member State, where available. These are collated here regarding employment, social policies and education, and have been updated in preparation for the next Semester cycle with addition of new information in 2022.

4.2.1 Recommendations relevant to employment

Article 27 CRPD refers to a wide range of policy steps that need to be taken, including the prohibition of disability discrimination in ‘all matters concerning all forms of employment’, protecting ‘just and favourable conditions of work’ and ‘labour and trade union rights’, promoting equal opportunities in work and training, and ensuring ‘reasonable accommodation’ is provided in the workplace.⁴¹ As yet, there has been no General Comment from the UN CRPD Committee on this Article⁴² but almost all Member States have received some question, comment or recommendation of relevance. Employment policies should include and support persons with disabilities within the mainstream of the labour market.

The UN Committee views the structural segmentation of persons with disabilities outside the mainstream in a similar way to segregated education or institutional care. For example, in its 2015 Concluding Observations to Germany, the CRPD Committee expressed concern about ‘segregation in the labour market’ and ‘The fact that segregated, sheltered workshops fail to prepare workers for or promote transition to the open labour market’.⁴³ In 2021, it recommended that Estonia ‘Strengthen measures to ensure work and employment of persons with disabilities in the open labour market, and inclusive work environments, including for persons with disabilities taking part in deinstitutionalisation processes...and ‘Adopt a strategy to abolish sheltered workshops’.⁴⁴ Similarly, France was recommended to ‘effectively abolish sheltered employment and adopt a time-bound policy and benchmarks to ensure that all persons with disabilities have access to work and employment in the open labour market, regardless of the type of impairment or level of support required’.⁴⁵

Understanding the extent to which employment policies integrate or marginalise job search and placement for persons with disabilities is highly relevant to the Semester. Labour market segmentation has disability implications too for the Social Pillar concerns with equality, labour rights and wage setting.⁴⁶ This kind of employment segmentation is not apparent from general statistical indicators, which present a unified picture of the labour market, but it should be considered among the explanatory factors for analysis at country level, where relevant.

In its 2015 Concluding Observations to the EU, the UN Committee expressed its concern at ‘the high unemployment rates for persons with disabilities, especially

⁴¹ See: <http://www.un.org/disabilities/default.asp?id=287>.

⁴² See: <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/GC.aspx>.

⁴³ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fDEU%2fCO%2f1.

⁴⁴ See: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fEST%2fCO%2f1.

⁴⁵ See: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fFRA%2fCO%2f1&Lang=en

⁴⁶ These are addressed in the Social Pillar analysis provided by ANED in 2016-17, <https://www.disability-europe.net/downloads/870-mainstreaming-disability-rights-in-the-european-pillar-of-social-rights-a-compendium>.

women with disabilities and persons with intellectual and/or psychosocial disabilities, in comparison with other groups of population in the European Union'. Accordingly:

The Committee recommends that the European Union take effective actions to measure the employment of persons with disabilities and to increase their employment rate in open labour market, including by providing training for Member States on reasonable accommodation and accessibility in the context of employment.⁴⁷

So, there is some expectation from the UN that the EU has shared competence and responsibility not only to protect non-discrimination rights arising from Directive 2000/78/EC but also to help the Member States co-ordinate and monitor employment policies (i.e. in the development of employment statistics and through the advisory process of the European Semester). These assumptions appear to be strengthened by the direction of the new EU disability strategy in 2021 and the continued recognition of disability issues in the current Employment Guidelines and Social Pillar.

To achieve co-ordination between the European Semester process and the UN CRPD process it would be useful for the Member States and the Commission to refer to UN Conclusions when preparing National Reform Programmes and Country Reports. The following extracts from the UN Committee's Recommendations on Article 27 highlight areas where the EU could harmonise its European Semester reviews with its supportive role to the Member States as a regional integration organisation under the UN CRPD).

Table 12: UN Recommendations to Member States under Article 27 CRPD (work and employment)

Country	Year	Recommendations (employment)
AT	2013	47. The Committee recommends that the State party enhance programmes to employ persons with disabilities in the open labour market. The Committee further recommends that measures be put in place to narrow the employment and pay gender gap.
BE	2014	39. The Committee recommends that the State party take all necessary regulatory measures and incentives to guarantee the right of persons with disabilities to employment, in both the private sector and the public sector. It should ensure that they have effective protection against discrimination, vocational training, adequate accessibility and the necessary reasonable accommodation.
BG	2018	58. The Committee recommends that the State party: (a) Adopt a policy framework and a strategy to promote employment for persons with disabilities in the open labour market, including by increasing resources for it, with the aim to facilitate transition from sheltered employment to the open labour market; (b) Recognize in its legal and policy framework the right of persons with disabilities to reasonable accommodation at the workplace; (c) Raise awareness among public and private companies about reasonable accommodation at work; (d) Strengthen training programmes for persons with disabilities on skills that are required in the open labour market and skills in entrepreneurship and collect disaggregated and targeted data about the participation of women and men with disabilities in programmes and the outcome of training for them.
CY	2017	54. The Committee recommends that the State party ensure access to employment in the open labour market, including by ensuring that the private

⁴⁷ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fEU%2fCO%2f1.

Country	Year	Recommendations (employment)
		sector is also covered by a quota system and by ensuring equal pay for work of equal value in all settings for all persons with disabilities being guided by target 8.5 of the Sustainable Development Goals. It furthermore recommends that the State party collect data on the employment of persons with disabilities, disaggregated by gender, age and type of impairment.
CZ	2015	52. The Committee calls upon the State party to ensure the same wage for all persons with disabilities, regardless of their disability classification. It also urges the State party to develop measures, intensify efforts and allocate sufficient resources to promoting the employment in the open labour market of persons with disabilities, especially women.
DE	2015	50. The Committee recommends that the State party provide regulations that effectively create an inclusive labour market in accordance with the Convention by: (a) Creating employment opportunities in accessible workplaces, in line with general comment No. 2 of the Committee, in particular for women with disabilities; (b) Phasing out sheltered workshops through immediately enforceable exit strategies and timelines and incentives for public and private employment in the mainstream labour market; (c) Ensuring that persons with disabilities do not face any reduction in social protection and pension insurance currently tied to sheltered workshops; (d) Collecting data on the accessibility of workplaces in the open labour market.
DK	2014	59. The Committee recommends that the State party take all necessary measures to significantly increase, as soon as possible, the percentage of persons with disabilities working in the open labour market, including amendments to the general labour legislation so that it imposes clear obligations on employers to afford reasonable accommodation to employees with disabilities.
EE	2021	53. The Committee recommends that the State party, in line with target 8.5 of the Sustainable Development Goals: (a) Strengthen measures to ensure work and employment of persons with disabilities in the open labour market, and inclusive work environments, including for persons with disabilities taking part in deinstitutionalization processes, those living in rural areas, persons with intellectual, persons with hearing impairments, and persons with psychosocial disabilities; (b) Adopt a strategy to abolish sheltered workshops. The State party should review labour conditions of all persons with disabilities, and ensure that persons with disabilities are not paid below the minimum wage; (c) Adopt measures, alongside with the workability reform to combat attitudinal barriers among employers, and adopt an action plan to assess periodically accessibility at the work place, including access to transportation, alternative means of information and communication, sign language and speech to text interpretation, and pictograms for job seekers and employees. The State party should adopt policies and procedures that establish and support the infrastructure for the provision of personal assistance at the workplace; (d) Ensure that the right to seek reasonable accommodation in the workplace is recognised for employees in the public and private sector; (e) Develop a comprehensive system of vocational and professional training for persons with disabilities and effective transitions from vocational and tertiary education to work and employment.
EL	2019	39. The Committee recommends that the State party take effective measures to ensure the inclusion of persons with disabilities, particularly women with disabilities, in the open labour market, with a view to achieving target 8.5 of the Sustainable Development Goals. It also recommends that the State party ensure the provision of specific measures and individualized support in the workplace; promote among employers the right of persons with disabilities to employment on an equal basis with others; and mainstream the disability dimension in all employment policies, measures and programmes, including in the policy design of the Greek Manpower Employment Organization.
ES	2011	46. The Committee recommends that the State party develop open and advanced programmes to increase employment opportunities for women and men with disabilities.
FI		[Not yet scheduled].

Country	Year	Recommendations (employment)
FR	2021	55. The Committee recommends that, in line with target 8.5 of the Sustainable Development Goals, the State party: (a) Move towards eradicating all forms of segregated work, strengthen measures to effectively abolish sheltered employment and adopt a time-bound policy and benchmarks to ensure that all persons with disabilities have access to work and employment in the open labour market, regardless of the type of impairment or level of support required, and their meaningful inclusion in work environments, in the private and public sectors; (b) Review the labour conditions of all persons with disabilities and ensure that persons with disabilities are not paid below the minimum wage; (c) Promote the employment of women with disabilities in the open labour market, ensuring that they are informed about and can effectively seek individualized support through the provision of reasonable accommodation, and have access to effective measures to balance work and family life; (d) Develop awareness-raising campaigns aimed at promoting the participation of women with disabilities in employment and at shifting attitudinal barriers to the recognition of the capacities of women with disabilities and their contribution to all domains of work in the open labour market, on an equal basis with others; (e) Ensure that persons with disabilities have access to general technical and vocational guidance programmes, vocational and continuing training, and to guidance towards employment on an equal basis with others, and adopt measures to support the careers of persons with disabilities who wish to work as researchers through multi-year planning in research establishments; (f) Ensure that the right to seek individualized support through the provision of reasonable accommodation in the workplace is recognized by employees in the public and private sectors, and strengthen measures to inform and facilitate the recognition of reasonable accommodation for employees in the workplace.
HR	2015	42. The Committee recommends that the State party develop and implement, in cooperation with organizations of persons with disabilities, a plan of action to increase the employment of persons with disabilities in the open labour market. It recommends that the quota system is complemented with other incentives for employers to hire persons with disabilities. Disincentives to employment for persons with disabilities should be analysed and remedied. Reasonable accommodation, including supported employment with personal assistance, and the accessibility of the workplace, should be regulated and monitored.
HU	2022	53. The Committee recommends that in line with target 8.5 of the Sustainable Development Goals, the State party: (a) Revise the existing legislation and measures of support for the employment of persons with disabilities and take comprehensive measures aimed at effectively supporting the work and employment of persons with disabilities in the open labour market and in inclusive work environments; (b) Adopt legislative and policy measures to protect the rights of persons with disabilities to just and favourable conditions of work, and ensure that persons with disabilities are not paid below the minimum wage and are provided with work contracts and equal remuneration for work on an equal basis with others; (c) Redirect the allocations for the employment of person with disabilities from sheltered employment to support the employment of persons with disabilities, including of persons who require high er levels of support and deinstitutionalized persons, and ensure that the right to seek reasonable accommodation in the workplace is recognized for employees in the public and private sectors; (d) Monitor, in close consultation with organizations of persons with disabilities, the accessibility of workplaces across the State party and adopt an action plan with the aim of outlining measures, with time frames and adequate budgets, to ensure reasonable accommodation in and the accessibility of workplaces, including access to transportation.
IE		[Not yet scheduled].
IT	2016	70. The Committee recommends that the State party be guided by article 27 of the Convention in implementing targets 8.5 of the Sustainable Development Goals; and that it ensures the achievement of full and productive employment and decent work for all, including persons with disabilities, and equal pay for work of

Country	Year	Recommendations (employment)
		equal value. In addition, the State party must implement special measures to address the low level of employment for women with disabilities. It also recommends that the State party remove any legislation limiting the rights of persons with disabilities to perform any profession on the grounds of their disability.
LT	2016	52. The Committee recommends that the State party, in close collaboration with representative organizations of persons with disabilities, eliminate the concept of 'working incapacity' of persons with disabilities and develop and implement efficient strategies and programmes aimed at increasing the employment rate of persons with disabilities in the open labour market, by eliminating segregated work environments and investing in promoting vocational training, access to appropriately adjusted workplaces, the provision of reasonable accommodation and the training of private and public employers, as set out in target 8.5 of the Sustainable Development Goals.
LU	2017	47. The Committee recommends that the State party adopt measures to phase out sheltered workshops, with a time-bound schedule and plan for transfer of those currently employed in sheltered workshops into the open labour market, and increase the level of employment of persons with disabilities in the open labour market, in line with the Convention and in view of target 8.5 of the Sustainable Development Goals, and that it ensure the achievement of full and productive employment and decent work for all, including persons with disabilities, and equal pay for work of equal value. It also recommends that the State party: (a) Designate an entity for monitoring and sanctioning non-compliance of labour quotas in both the private and public sectors; (b) Take measures to ensure the effective monitoring of the provision of reasonable accommodation, with appropriate remedies for the denial of requests; (c) Provide vocational and professional training and provide incentives for the self-employment of persons with disabilities, particularly women with disabilities.
LV	2017	47. The Committee recommends that the State party: (a) Ensure support for the employment of all persons with disabilities in the open labour market in inclusive employment settings on an equal basis with others; (b) Pay attention to the links between article 27 of the Convention and target 8.5 of the Sustainable Development Goals.
MT	2018	40. The Committee recommends that the State party adopt further enforcement mechanisms and incentives to ensure the implementation of the quota system under articles 15 and 16 of the Persons with Disability (Employment) Act and other measures to support persons with disabilities to work in the open labour market, in accordance with the Convention and target 8.5 of the Sustainable Development Goals, and ensure the achievement of full and productive employment and decent work for all. It also recommends that the State party: (a) Amend article 17 (3) of its Constitution to bring it in conformity with article 27 of the Convention; (b) Review the quota system under the Persons with Disability (Employment) Act in order to make it applicable to enterprises with less than 20 employees; (c) Replace any assessment of suitability to work with an assessment that considers the needs and requirements for reasonable accommodation at work for persons with disabilities; (d) Step up efforts to raise awareness among employers on the rights of persons with disabilities to work in the open labour market, in particular the provision of reasonable accommodation, and on the benefits of employing persons with disabilities.
NL		[Not yet scheduled].
PL	2018	48. The Committee recommends that the State party develop legislation and measures for the employment of persons with disabilities in the open labour market, and that it in particular: (a) Promote the work and employment of women with disabilities, and ensure equal income, particularly in rural areas; (b) Promote decent work for persons with disabilities, particularly women with disabilities, in public and private sectors and provide specific incentives and support for reasonable accommodation, including individual assistance for employing persons with a wide range of disabilities; (c) Ensure that the employment quota of

Country	Year	Recommendations (employment)
		6 per cent for persons with disabilities is reached in all sectors, in particular in the public administration sector; (d) Ensure that open labour market activation programmes effectively include all persons with disabilities.
PT	2016	52. The Committee recommends that the State party, in close consultation with organizations representing persons with disabilities, review its public- and private-sector labour legislation to bring it into line with the Convention and that it takes measures to enforce the law and apply the stipulated penalties for non-compliance. The Committee also recommends that it do away with segregated working environments, that it review the legislation regulating the Occupational Activity Centres from a human rights perspective to bring them into line with the Convention and that it steps up efforts to promote access to the regular labour market for persons with intellectual disabilities and autism. The State party should promote corporate social responsibility in connection with the employment of persons with disabilities. The Committee recommends that the State party consider the links between article 27 of the Convention and target 8.5 of the Sustainable Development Goals, with a view to achieving full and productive employment and decent work for all women and men, including for persons with disabilities, and equal pay for work of equal value.
RO		[Not yet scheduled].
SE	2014	50. The Committee recommends that the State party take measures to improve opportunities for persons with disabilities to obtain work on the basis of the report presented by the FunkA Inquiry (FunkA-utredning). It further suggests that the State party increase measures of support, including, inter alia, personal assistance in employment, technical assistance in performing in the workplace, reduced social fees, financial support to employers, rehabilitation and vocational training, and that it put in place measures to narrow the employment and pay gender gap. The Committee recommends that the State party assess the impact of the use in the labour market of the term 'people with reduced capacities or limitations' to refer to persons with disabilities and revise it in accordance with the principle of non-discrimination.
SI	2018	46. The Committee recommends that the State party: (a) Adopt measures aimed at promoting an inclusive, open and accessible labour market in all sectors for all persons with disabilities; (b) Create specific incentives for employers and provide reasonable accommodation for persons with disabilities, particularly for persons with intellectual disabilities, aimed at facilitating their inclusion in the open labour market; (c) Ensure the safeguarding of all incomes, including disability pensions for self-employed persons with disabilities; (d) Ensure equal requirements for employment quotas in the public administration and information services and other work sectors, and monitor their implementation. The State party should collect data on compliance with the quota system and provide for adequate sanctions in cases of non-compliance.
SK	2016	74. The Committee recommends that the State party step up efforts on the transition from sheltered workshops to an open labour market for all. The process must include an action plan, timetable, budget and training for public and private sector employers, including on the provision of reasonable accommodation. The Committee also recommends that the State party pay attention to the links between article 27 of the Convention and target 8.5 of the Sustainable Development Goals.

4.2.2 Recommendations relevant to social policies and healthcare

4.2.2.1 Social protection

Table 13: UN Recommendations to Member States under Article 28 CRPD (social protection)

Country	Year	Recommendations (social protection)
AT	2013	37. The Committee recommends that the State party ensure that the federal Government and the governments of the Länder step up efforts towards de-institutionalisation and allowing persons with disabilities to choose where they live.
BE	2014	There was no recommendation on Article 28.
BG	2018	60. The Committee recommends that the State party revise the criteria for assessing the degree of impairment, incorporate the human rights model of disability in the assessment process, and ensure that persons with disabilities continue to enjoy an adequate standard of living. It also calls upon the State party to intensify its efforts to ensure that all persons with disabilities can meet the additional costs of disability, including by increasing budget allocations and resources accordingly.
CY	2017	56. The Committee recommends that the State party implement progressively measures to ensure adequate income of persons with disabilities in order to reduce significantly the pay gap between persons with and without disabilities, regardless of gender, ethnic origin or age, and that it abolish the requirement of user payment for social services and support and partial payment for disability-related expenses and assistive devices, being guided by target 10.2 of the Sustainable Development Goals. Furthermore, the Committee recommends that the State party identify a social protection floor that is not affected by expenses for disability-related costs and assistive devices and user payments for social services and support, in order to alleviate the socioeconomic disadvantages that result from the exclusion experienced by persons with disabilities.
CZ	2015	54. The Committee calls upon the State party to review the legislation on the provision of benefits to persons with disabilities, with genuine participation of persons with disabilities, to reintroduce the additional social allowance in order to bring the standard of living of families with children with disabilities above the subsistence level. The State party should also broaden the range of and facilitate access to assistive devices for children with disabilities, regardless of age. 56. The Committee calls upon the State party to revise its legislation on disability pension beneficiaries and the newly established method of calculating the relevant period from the beginning of disability until the entitlement of retirement pensions, as it has resulted in the amount of the pension received by persons with disabilities at the third level being below the minimum subsistence level.
DE	2015	52. The Committee recommends that the State party immediately undertake a review of the personal income used by persons with disabilities to meet their needs and to live independently. The Committee also recommends that the State party provide social services to persons with disabilities that provide the same living standards compared to persons without disabilities on comparable incomes.
DK	2014	There was no recommendation on Article 28.
EE	2021	55. Taking into account the links between article 28 of the Convention and target 1.3 of the Sustainable Development Goals, the Committee recommends that the State party: (a) Mainstream the rights of persons with disabilities within the national strategy for poverty eradication with concrete expeditious measures and earmarked budgets to address situations of disadvantage and exclusion concerning older persons with disabilities, in particular older women; (b) Prioritise persons with disabilities in the socio-economic response to the COVID-19 pandemic, and ensure the access to appropriate and affordable services and facilities for the general population, assistance, transportation and to public housing programmes for persons with disabilities, particularly to women with disabilities.

Country	Year	Recommendations (social protection)
EL	2019	41. The Committee recommends that the State party revise the relevant legal provisions and practices on welfare allowances, benefits, pensions and tax exemptions for persons with disabilities, harmonizing the existing rules and repealing discriminatory rules and practices, including in the disability certification system. The Committee also recommends that the State party ensure the effective implementation of the existing social protection framework, and progressively develop further measures to ensure an adequate standard of living for persons with disabilities.
ES	2011	40. The Committee encourages the State party to ensure that an adequate level of funding is made available to effectively enable persons with disabilities: to enjoy the freedom to choose their residence on an equal basis with others; to access a full range of in-home, residential and other community services for daily life, including personal assistance; and to so enjoy reasonable accommodation so as to better integrate into their communities.
FI		[Not yet scheduled].
FR	2021	57. Taking into account the links between article 28 of the Convention and target 1.3 of the Sustainable Development Goals, the Committee recommends that the State party: (a) Assess the implementation of disability legislation and policies at the national and regional levels with the aim of ensuring equal access to support for persons with disabilities regardless of their age, and streamline procedures at the municipal level to provide persons with disabilities with support. The State party should provide persons with disabilities with information about their rights and entitlements in accessible formats, including Easy Read; (b) Review the provisions concerning the allocation and the amount of the adult disability allowance in consultation with organizations of persons with disabilities; (c) Streamline social security support systems to ensure that they are accessible to all persons with disabilities, as a measure to tackle poverty; (d) Design and implement programmes to establish accessible housing and reinforce human rights-based support schemes for all persons with disabilities to cover disability-related expenses and to enable them to gain access to an adequate standard of living.
HR	2015	44. The Committee recommends that poverty reduction programmes be strengthened. It also recommends that benefits aimed at alleviating increased costs arising from disability should be based on an assessment of the individual's support needs and should disregard any financial assets test.
HU	2022	55. The Committee recommends that the State Party take appropriate legislative steps to: (a) Recognize the right of persons with disabilities to an adequate standard of living for them and their families and to progressive improvement in their living conditions through decent disability allowances and benefits and accessible and available housing and services in the community; (b) Redress the negative impacts of the reform of the disability benefits schemes in 2012 and ensure that persons with disabilities are compensated for the damage caused by the reform; (c) Revise the disability entitlement system to make it accessible and easy to use for all persons with disabilities, through the provision of alternative and augmentative modes of information and communication.
IE		[Not yet scheduled].
IT	2016	72. The Committee recommends that the State party expedite constitutional reform to homogenize social protection interventions and policies throughout the national territory; expedite the adoption and implementation of the Minimum Standards of Social Assistance; conduct assessments of the impact of austerity measures on children and adults with disabilities; and prevent any further reduction in resources that could increase levels of poverty. It also recommends that the State party be guided by article 28 of the Convention in implementing target 10.2 of the Sustainable Development Goals, including by mainstreaming disability in its poverty reduction policies.
LT	2016	54. The Committee recommends that the State party adopt new policies that secure income levels among persons with disabilities and their families that are

Country	Year	Recommendations (social protection)
		adequate and equal to the income levels of others, and that take into account additional disability-related costs. 56. The Committee recommends that the State party take steps to secure that persons with disabilities and their families are not disproportionately affected by budget cuts and to ensure an adequate standard of living through income support and social security, taking note of target 1.3 of the Sustainable Development Goals, which calls on States to implement appropriate social protection systems and measures for all, including floors.
LU	2017	49. The Committee recommends that the State party collect data on the socioeconomic situation of persons with disabilities to design appropriate policies to ensure an adequate standard of living for persons with disabilities and their families. It also recommends that the State party: (a) Ensure that social protection policies and programmes secure income levels by taking into account the additional costs related to disability; (b) Guarantee that persons with disabilities have access to sufficient community-based social services, public housing programmes and support services for living independently respectful of the rights, will and preferences of persons with disabilities; (c) Pay attention to the links between article 28 of the Convention and target 1.3.1 of the Sustainable Development Goals, which calls upon States to implement appropriate social protection systems and measures for all, including floors.
LV	2017	49. The Committee recommends that the State party: (a) Ensure an adequate standard of living for persons with disabilities and their families, by guaranteeing, inter alia, that social protection and poverty reduction programmes take into account the additional costs related to disability; (b) Pay attention to the links between article 28 of the Convention and target 1.3 of the Sustainable Development Goals.
MT	2018	No observations were provided on Article 28.
NL		[Not yet scheduled].
PL	2018	50. Taking into account the links between article 28 of the Convention and target 1.3 of the Sustainable Development Goals, the Committee recommends that the State party: (a) Emphasize the rights of persons with disabilities, particularly of women with disabilities, and mainstream them into the national strategy for reducing poverty with concrete measures and relevant budget; (b) Ensure that the employment of persons with disabilities does not make them ineligible for disability-related protection schemes, such as disability allowances; (c) Collect disaggregated data on the poverty of persons with disabilities, and monitor the effectiveness of social security mechanisms designed to combat poverty; (d) Ensure specific measures to ensure access to housing for persons with disabilities; (e) Ensure that the term 'public housing' is translated correctly in the Polish-language version of the Convention.
PT	2016	54. The Committee recommends that the State party, in cooperation with organizations representing persons with disabilities, take the following measures: (a) Urgently review austerity measures to prevent further negative and regressive effects on the standard of living and social protection of persons with disabilities by taking steps that enable them to be included in the community; (b) Provide support services for living independently and residential homes respectful of the rights of persons with disabilities, their wishes and preferences, in addition to providing cash subsidies to make it possible for unemployed persons with disabilities and without family support to have a decent standard of living; (c) Step up efforts, in line with the human rights approach of the Convention, to strengthen the right to a decent standard of living and the social protection of persons with disabilities who are living in poverty and extreme poverty, allocating funds sufficient for that purpose; (d) Consider the links between article 28 of the Convention and target 10.2 of the Sustainable Development Goals in order to empower and promote the social, economic and political inclusion of all, irrespective of their disability.
RO		[Not yet scheduled].
SE	2014	No observations were provided on Article 28.

Country	Year	Recommendations (social protection)
SI	2018	32. With reference to the Committee's general comment No. 5 (2017) on living independently and being included in the community, the Committee recommends that the State party: (a) Adopt and implement a strategy and action plan, within a time frame, aimed at deinstitutionalization; (b) Prevent any form of re-institutionalization and provide sufficient funding for developing community-based independent living schemes; (c) Allocate sufficient resources to ensure that services in the community are available, accessible, affordable, acceptable and accommodating of persons with disabilities, so that such persons may exercise their right to live independently and be included in their communities, in both urban and rural areas; (d) Strengthen the national and municipal capacity to implement deinstitutionalization, in close cooperation with organizations of persons with disabilities.
SK	2016	76. The Committee recommends that the State party provide an adequate standard of living to persons with disabilities, including those from an ethnic minority background and those over the age of 65, and ensure that social protection schemes are regularly monitored to track the alleviation of poverty. The Committee also recommends that the State party pay attention to the links between article 28 of the Convention and target 10.2 of the Sustainable Development Goals.

4.2.2.2 Independent living

Table 14: UN Recommendations to Member States under Article 19 CRPD (living independently)

Country	Year	Recommendations (independent living)
AT	2013	39. The Committee recommends that the State party ensure that the personal assistance programmes provide sufficient financial assistance to ensure that a person can live independently in the community. The Committee further recommends that the State party harmonize and broaden its personal assistance programmes by making personal assistance available to all persons with intellectual and psychosocial disabilities.
BE	2014	There was no recommendation on Article 28. 33. The Committee recommends that the State party work towards deinstitutionalization by reducing investment in collective infrastructure and promoting personal choice. The Committee urges the State party to implement a disability action plan at all levels of the State to guarantee access to services and an independent life for persons with disabilities so that they are able to live in the community. The action plan must eliminate current waiting lists and ensure that persons with disabilities have access to sufficient financial resources and that communities are accessible for persons with disabilities. The Committee recommends that the State party devise international cooperation programmes that respect the right of persons with disabilities to live in the community and involve disabled persons' representatives and their families in their preparation.
BG	2018	40. The Committee, in accordance with its general comment No. 5, recommends that the State party: (a) Accelerate the transition process to ensure that all persons with disabilities living in any form of institution, such as psychiatric hospital units or in small community-based group homes, have the right to live independently within the community with choices equal to those of other persons; in the deinstitutionalization process, the State party should focus on the situation of persons with intellectual or psychosocial disabilities, and children and elderly persons with disabilities; (b) Allocate greater resources for developing individualized support services for persons with disabilities, regardless of the type of impairment or age; such services should include peer support and personal assistance; (c) Adopt legislation on individualized and self-managed personal assistance and social and support services, recognizing the right to live independently and be included in the community as a subjective right for all persons with disabilities, regardless of their impairment or required level of support; (d) Implement a procedure to consult in a meaningful and disability-sensitive manner with organizations of persons with disabilities on all aspects of the implementation of article 19, including deinstitutionalization strategies and processes; (e) Allocate national financial resources and those provided by the European Union to promote the inclusion of persons with disabilities in society, and introduce efficient remedies and guidelines to avoid spending national and international funds on establishing infrastructure, housing and/or services that are not accessible or affordable to all persons with disabilities.
CY	2017	44. The Committee recommends that the State party, in close collaboration with representative organizations of persons with disabilities, and in line with Article 4(3) of the Convention: (a) Develop and implement safeguards securing the right to independent living; (b) Adopt and immediately implement an adequately funded deinstitutionalization strategy; (c) Redirect resources allocated to institutionalization and earmark and allocate them to community-based services and increase the budget enabling persons with disabilities to live independently across the State party with access to individually assessed and adequate services, including personal assistance, within the community.

Country	Year	Recommendations (independent living)
CZ	2015	<p>39. The Committee urges the State party to step up the process of deinstitutionalization and to allocate sufficient resources for the development of support services in local communities that would enable all persons with disabilities, regardless of their impairments, gender or age, to choose freely with whom, where and under which living arrangements they will live, in line with the provisions of article 19 of the Convention.</p> <p>40. The Committee recommends that the State party take all measures necessary to ensure that policy processes for deinstitutionalization, including the development of the National Plan on Promoting Equal Opportunities for Persons with Disabilities 2015–2020, have a clear timeline and concrete benchmarks for implementation that are monitored effectively at regular intervals. In particular, the Committee urges the State party to abolish the placement of children under 3 years of age in institutionalized care as soon as possible.</p>
DE	2015	<p>42. The Committee recommends that the State party:</p> <p>(a) Take steps towards the legal reform of section 13, paragraph 1 (3), of the Twelfth Book of the Social Code for increased social assistance services to enable inclusion, self-determination and the choice to live in the community;</p> <p>(b) Allocate sufficient financial resources to facilitate deinstitutionalization and promote independent living, including increased financial resources to provide community-based outpatient services providing the required support to persons with intellectual or psychosocial disabilities based on the free and informed consent of the individual concerned, across the whole country;</p> <p>(c) Increase access to programmes and benefits to support living in the community and ensure they cover disability-related costs.</p>
DK	2014	<p>43. The Committee recommends that the State party end the use of State-guaranteed loans to build institution-like residences for persons with disabilities; that it amend the legislation on social services so that persons with disabilities may freely choose where and with whom they live, while enjoying the necessary assistance to live independently; and that it take measures to close existing institution-like residences and to prevent the forced relocation of persons with disabilities, in order to avoid isolation from the community.</p>
EE	2021	<p>39. The Committee recalls its General comment No. 5 (2017) on living independently and being included in the community, and recommends that the State party:</p> <p>(a) Adopt a strategy, including awareness raising activities to promote understanding of the right to choose and self-determination of persons with disabilities concerning living arrangements, the right to not be obliged to live in a particular living arrangement, and the value of inclusion in the community, as opposed to segregation from the community;</p> <p>(b) Implement a moratorium of new institutionalization of children and adults with disabilities, revise its deinstitutionalization strategy, and redirect the use of public funds, including the European Regional Development funds to developing individualized support for living independently, and transition programmes from congregated settings, such as 'home-like institutions', 'family-type houses' and 'special care villages' to inclusion in the community;</p> <p>(c) Develop a system for self-managed personal assistance, which include the person-directed tools for supporting living independently in the community, according to an individual's requirements and preferences;</p> <p>(d) Set up a timeframe and benchmarks for achieving accessibility to mainstream services in the community by persons with disabilities on an equal basis with others.</p>
EL	2019	<p>29. The Committee recommends that, in line with its general comment No. 5 (2017) on living independently and being included in the community, the State party:</p> <p>(a) Adopt a comprehensive national strategy with clear time-bound measures and sufficient funds for effective deinstitutionalization at all levels;</p> <p>(b) Ensure the active involvement of persons with disabilities through their representative organizations in the development of independent living strategies</p>

Country	Year	Recommendations (independent living)
		and schemes that provide accessible community-based services, especially at the local level.
ES	2011	42. The Committee encourages the State party to expand resources for personal assistants to all persons with disabilities in accordance with their requirements.
FI		[Not yet scheduled].
FR	2019	<p>41. The Committee recalls its general comment No. 5 (2017) on living independently and being included in the community, and recommends that the State party, in consultation with organizations of persons with disabilities:</p> <p>(a) End the institutionalization of children and adults with disabilities, including in small residential homes, and launch a national strategy and action plans to end the institutionalization of persons with disabilities, with time-bound benchmarks, human, technical and financial resources, responsibilities for implementation and monitoring, and measures to support the transition from institutions to life in the community;</p> <p>(b) Ensure the implementation of the agreement concerning the moratorium on placing persons with disabilities in Belgian institutions, and strengthen measures to support families of children with disabilities and to uphold the right of persons with disabilities to live independently and in the community;</p> <p>© Recognize the right to live independently and to be included in the community in legislation and take measures to implement it, and develop awareness-raising measures, including campaigns, about it and about the harmful effects of institutionalization on persons with disabilities;</p> <p>(d) Ensure the availability of support to live independently and in the community, such as user-led budgets and personalized support, and enable persons with disabilities to exercise choice and control over their lives and to make decisions concerning where and with whom to live, as outlined in general comment No. 5 (2017);</p> <p>(e) Adopt measures to ensure the access of persons with disabilities to affordable and accessible housing on the basis of individual choice and outside any type of congregated premises; (f) Establish a time frame and benchmarks for achieving full accessibility for persons with disabilities to mainstream community services, such as education, health, work and employment.</p>
HR	2015	30. The Committee recommends that the process of deinstitutionalization include all residential institutions and foster homes for all persons with disabilities. It recommends that a legal framework be adopted to provide for entitlement to personal assistance services in the community and that a process be initiated to make local communities and mainstream services accessible to persons with disabilities
HU	2022	<p>41. Recalling its general comment No. 5 (2017), the Committee reiterates the recommendations set out in its report on the inquiry concerning Hungary under article 6 of the Optional Protocol to the Convention , urging the State party to:</p> <p>(a) Discontinue the institutionalization of children with disabilities and ensure their right to a family life by redirecting investments from institutions into support measures for families and the provision of inclusive community services, such as inclusive early intervention, across the State party;</p> <p>(b) Ensure independent monitoring of the deinstitutionalization of children with disabilities and independent methodological support for that process, with the close involvement of disability rights organizations;</p> <p>(c) Revise its deinstitutionalization strategy with the aim of redefining its objectives;</p> <p>(d) Redesign its measures and redirect its effort s and budgets into community-based support services, including personal assistance, with the aim of providing for persons with disabilities to live independently in the community equally with others, regardless of the type of impairment, guarantee that community services and facilities for the general population are available for persons with disabilities and ensure that persons with disabilities have the opportunity and right to choose their place of residence on an equal basis with others in the community .</p>
IE		[Not yet scheduled].

Country	Year	Recommendations (independent living)
IT	2016	48. The Committee recommends that the State party implement safeguards to retain the right to autonomous independent living across all regions, and redirect resources from institutionalization to community-based services and increase budget support to enable persons with disabilities to live independently across the country and have equal access to services, including personal assistance.
LT	2016	40. The Committee recommends that the State party, in close collaboration with organizations of persons with disabilities: (a) Adopt an adequately funded strategy for deinstitutionalization ensuring a range of community-based services for the social inclusion of persons with disabilities, including for children with intellectual and/or psychosocial impairments, including their right to live independently in the community, with the possibility of individualized personal assistance support services in their home; (b) Effectively implement the action plan for the implementation of the national programme for the social integration of persons with disabilities for the period 2013-2019 at all levels of the State; (c) Adopt a moratorium on new admissions of children into institutionalized care; (d) Eliminate excessive waiting time for receiving support services by investing in developing new services and rendering existing services accessible and inclusive and ensure that persons with disabilities have access to sufficient financial resources for independent living and improved access to accessible services in the community.
LU	2017	37. The Committee recommends that the State party take into account its general comment No. 5 (2017) on living independently and being included in the community, and: (a) Adopt the legal and other measures necessary, including repealing Reform Act 7014 and relevant disability insurance systems, replacing them by legislation promoting the right to independent living and being included in the community, providing for, among others, personal assistance and clarifying the responsibilities and resource allocations of central and local authorities; (b) Develop and implement an effective deinstitutionalization plan, with a clear time frame and benchmarks, involving persons with disabilities through their representative organizations in all stages; (c) Adopt the measures necessary to ensure that persons with disabilities have a legal entitlement to a sufficient personal budget for independent living, which takes into account the additional costs related to disability and, at the same time, redirect resources from institutionalization to community-based services, while increasing the availability of personal assistance.
LV	2017	31. The Committee urges the State party to: (a) Expedite the complete deinstitutionalization of all persons with disabilities within a set time frame in order to close all remaining institutions, both those run by the State and the municipalities, ensuring that residents are not subject to trans-institutionalization ; (b) Reinforce the engagement of municipalities in implementing the deinstitutionalization strategy, including through raising awareness about independent community-based living for persons with disabilities and ensuring sustainable provision of services to promote independent living following termination of European structural funds; (c) Ensure the provision of quality personal assistance that takes into account the individual needs of persons with disabilities and ensures their social inclusion and participation.
MT	2018	30. The Committee recommends that the State party take into account its general comment No. 5 (2017) and: (a) Ensure that existing residential institutions that contribute to the isolation of persons with disabilities are closed and that the provision of appropriate community-based services is strengthened; (b) Ensure that all projects supported by public funds are carried out in a community setting, do not contribute to isolation of persons with disabilities, are

Country	Year	Recommendations (independent living)
		monitored by organizations of persons with disabilities and are provided with sustainable continuous funding; (c) Adopt the legal and other measures, such as the planned bill on personal autonomy and the bill on the Convention, necessary to make article 19 of the Convention justiciable; (d) Ensure that financial and other measures are in place to allow persons with disabilities to be provided with personal assistance and that personnel supporting persons with disabilities in the community are appropriately trained, if necessary.
NL		[Not yet scheduled].
PL	2018	33. With reference to general comment No. 5 (2017) on living independently and being included in the community, the Committee recommends that the State party: (a) Design and adopt concrete action plans for deinstitutionalization and time-bound transition to independent living schemes for persons with disabilities within the community, and ensure that adequate funding is allocated to this process after the termination of European Union funds allocated specifically to this purpose; (b) Adopt legal frameworks and allocate a sustainable budget for providing persons with disabilities with personal assistance within the framework of individualized and inclusive support arrangements; (c) Ensure the spending of European Union funds allocated to deinstitutionalization on measures that are consistent with the provisions of the Convention, and that such spending is monitored, with the effective participation of persons with disabilities and/or their representative organizations, to ensure that such spending is in line with the requirements of persons with disabilities themselves; (d) Ensure that the term 'community' is translated correctly in the Polish-language version of the Convention.
PT	2016	39. The Committee recommends that the State party, in close consultation with organizations representing persons with disabilities, adopt a national strategy for living independently, including increased investment to facilitate living independently in the community rather than in institutions, that it regulates personal assistance and that it increases the availability of sign language interpreters and fingerspelling systems in public services. It also urges the State party to establish support services in the community for persons with intellectual or psychosocial disabilities.
RO		[Not yet scheduled].
SE	2014	44. The Committee recommends that the State party ensure that personal assistance programmes provide sufficient and fair financial assistance to ensure that a person can live independently in the community.
SI	2018	48. In the light of the links between article 28 of the Convention and target 1.3 of the Sustainable Development Goals, the Committee recommends that the State party: (a) Ensure the efficiency and effectiveness of social protection and poverty reduction programmes for persons with disabilities, especially persons with psychosocial and/or intellectual disabilities; (b) Restore all support measures curtailed under the austerity policy and prevent any hardship that may be faced by persons with disabilities whose income was reduced as a result of that policy; (c) Ensure the accessibility of public housing for persons with disabilities, disseminate information about available and affordable housing in accessible formats and engage with the private sector with a view to promoting the development of accessible housing units; (d) Implement positive measures to provide taxation relief in respect of pensions and disability insurance for persons with disabilities living in poverty; (e) Recognize the right of persons with disabilities to receive a full disability pension and insurance through the relevant legal and administrative mechanisms; (f) Ensure a dignified and inclusive social protection system for older persons with disabilities.

Country	Year	Recommendations (independent living)
SK	2016	56. The Committee recommends that the State party provide and implement a timetable to ensure that the implementation of the deinstitutionalization process is expedited, including by putting in place specific additional measures to ensure that community-based services are strengthened for all persons with disabilities, in particular women with disabilities and older persons with disabilities. Furthermore, the State party should ensure that the use of European structural and investment funds complies with article 19 and that new follow-up national action plans on the transition from institutional settings to community-based support are initiated with the comprehensive involvement of organizations of persons with disabilities and civil society organizations, including in the area of monitoring. The Committee also recommends that the State party no longer allocate resources from the national budget to institutions and that it reallocates resources into community-based services in accordance with the investment priorities of the European Regional Development Fund (art. 5.9 (a) of European Union regulation No. 1303/2013).

4.2.2.3 Health

Table 15: UN Recommendations to Member States under Article 25 CRPD (health)

Country	Year	Recommendations (health)
AT	2013	43. The Committee recommends that greater efforts be made to support students with disabilities in all areas of inclusive education from kindergarten to secondary school. It particularly recommends that the State party ensure that persons with disabilities, including children with disabilities and their representative organisations, are involved in the day-to-day implementation of the inclusive education models introduced in various Länder. The Committee further recommends that greater efforts be made to enable persons with disabilities to study at universities and other tertiary institutions. The Committee also recommends that the State party step up its efforts to provide quality teacher training to teachers with disabilities and teachers with sign language skills, so as to enhance the education of deaf and hearing-impaired girls and boys, in accordance with the formal recognition of Austrian sign language in the Constitution of Austria.
BE	2014	37. The Committee requests that the State party implement a coherent inclusive education strategy for children with disabilities in the mainstream system and ensure the provision of adequate financial, material and human resources. It recommends that the State party ensure that children with disabilities receive the educational support they need, in particular through the provision of accessible school environments, reasonable accommodation, individual learning plans, assistive technology in classrooms, and accessible and adapted materials and curricula, and guarantee that all teachers, including teachers with disabilities, receive comprehensive training on the use of Braille and sign language with a view to improving the education of all children with disabilities, including boys and girls who are blind, deaf-blind, deaf or hard of hearing. The Committee also recommends that inclusive education should form an integral part of teacher training at university and during continuing professional development.
BG	2018	50. The Committee recommends that the State party, in accordance with general comment No. 4 (2016) on the right to inclusive education: (a) Replace segregated education systems with quality inclusive education; (b) Raise awareness of the advantages of quality inclusive education for society, in particular for teachers and other education staff, and also for parents of children without disabilities; (c) Intensify its efforts to ensure quality inclusive education and the provision of reasonable accommodation for students with disabilities in mainstream schools, including by allocating sufficient human, technical and financial resources for it; (d) Collect data on the number of children and young people with disabilities not currently enrolled in any form of education, disaggregated by age, sex, type of

Country	Year	Recommendations (health)
		impairment and place of residence, and develop a strategy to include these children in the mainstream education system.
CY	2017	50. The Committee recommends that the State party: (a) Decide upon a clear legislative scope of inclusive education and monitor its implementation with a view to fully replacing segregated education by inclusive education; (b) Adopt a clear, targeted and adequately funded plan of action that includes access to reasonable accommodation and adequate teacher education and training, and progressively ensure that children and adult learners with disabilities are able to exercise their right to inclusive education; (c) Be guided by general comment No. 4 (2016) and targets 4.5 and 4 (a) of the Sustainable Development Goals in ensuring equal access to all levels and types of education, education facilities and vocational training by persons with disabilities.
CZ	2015	48. The Committee recommends that the State party implement the amended School Act, incorporate inclusive education as the guiding principle of the education system and ensure the admission of children with disabilities in mainstream schools, in line with article 24 of the Convention. The Committee calls upon the State party to intensify its efforts and to allocate sufficient financial and human resources for reasonable accommodations that will enable boys and girls with disabilities, including intellectual disabilities and autism, and deaf-blind children, to receive inclusive quality education.
DE	2015	46. The Committee recommends that the State party: (a) Immediately develop a strategy, action plan, timeline and targets to provide access to a high-quality, inclusive education system across all Länder, including the required financial resources and personnel at all levels; (b) Scale down segregated schools to facilitate inclusion and ensure that the law and policies uphold the duty that mainstream schools enrol children with disabilities with immediate effect if that is their choice; (c) Ensure that reasonable accommodation is provided at all levels of education and that the right to such accommodation is legally enforceable and justiciable before the courts; (d) Ensure the training of all teachers in inclusive education, increased accessibility of the school environment, materials and curricula, and the provision of sign language in mainstream schools, including at the post-doctoral level.
DK	2014	53. The Committee recommends that the State party amend its legislation to ensure the inclusion of all children with disabilities in the mainstream education system, with adequate support and accommodation, in particular through the provision of adequate training to teachers and other employees in the school system in all parts of the Kingdom of Denmark, in order to ensure quality education for pupils with disabilities. The State party should take measures to address discrepancies in accomplishment rates between pupils with and without disabilities at all levels of education. 55. The Committee recommends that the State party amend its legislation to ensure that all children with disabilities can submit a complaint to an independent authority if they do not receive adequate educational support.
EE	2021	47. Recalling its general comment No. 4 (2016) on the Right to inclusive education and the Sustainable Development Goal 4, target 4.5 and indicator 4 (a), the Committee recommends, that the State party: (a) Develop the strategy for implementing quality inclusive education with specific targets, timelines, budget allocation, and share of responsibilities between national and municipal levels; (b) Establish a policy framework that recognises the right of persons with disabilities to seek, individualized supports as reasonable accommodation in education, when so required; (c) Ensure education is an area of life covered under anti-discrimination and includes the denial of reasonable accommodation as a form of discrimination;

Country	Year	Recommendations (health)
		<p>(d) Provide students with disabilities with assistive compensatory aids and learning materials in alternative/accessible formats, including inclusive digital access, modes and means of communication, including Easy Read, communication aids and assistive and information technology, and ensure teachers fluent in Estonian Sign Language;</p> <p>(e) Take measures, including the provision of technical equipment, and the adoption of regulations to ensure that children with disabilities receive the individualized support required within the quality and inclusive education system during the COVID-19 pandemic period, especially in rural areas and those facing economic hardship, and guarantee for children with chronic diseases equal access to school.</p>
EL	2019	<p>5. Recalling its general comment No. 4 (2016) on the right to inclusive education, and taking into account Sustainable Development Goal 4, especially targets 4.5 and 4.a, the Committee recommends that the State party increase its efforts to guarantee inclusive education, and in particular that it:</p> <p>(a) Adopt and implement a coherent strategy on inclusive education in the mainstream educational system;</p> <p>(b) Ensure the accessibility of school and university environments, in line with the Convention, by promoting universal design, the provision of specific measures and individualized support, such as accessible and adapted materials, inclusive curricula, inclusive information and communication technologies for pupils and students with disabilities, and digital pedagogy;</p> <p>(c) Immediately ensure access to formal education for all refugee, asylum-seeking and migrant children with disabilities, and for Roma children with disabilities;</p> <p>(d) Allocate effective and sufficient financial and material resources and adequately and regularly trained personnel, including persons with disabilities, to effectively guarantee inclusive education;</p> <p>(e) Incorporate inclusive education training into higher education curricula for trainee teachers, and into training programmes for current teaching staff, with an adequate budget.</p>
ES	2011	<p>44. The Committee reiterates that denial of reasonable accommodation constitutes discrimination and that the duty to provide reasonable accommodation is immediately applicable and not subject to progressive realization. It recommends that the State party:</p> <p>(a) Increase its efforts to provide reasonable accommodation in education, by: allocating sufficient financial and human resources to implement the right to inclusive education; paying particular attention to assessing the availability of teachers with specialist qualifications; and ensuring that educational departments of local governments understand their obligations under the Convention and act in conformity with its provisions;</p> <p>(b) Ensure that the decisions to place children with a disability in a special school or in special classes, or to offer them solely a reduced-standard curriculum, are taken in consultation with the parents;</p> <p>(c) Ensure that the parents of children with disabilities are not obliged to pay for the education or for the measures of reasonable accommodation in mainstream schools;</p> <p>(d) Ensure that decisions on placing children in segregated settings can be appealed swiftly and effectively.</p>
FI		[Not yet scheduled].
FR	2019	<p>53. Taking into account the links between article 25 of the Convention and targets 3.7 and 3.8 of the Sustainable Development Goals, the Committee recommends that the State party:</p> <p>(a) Ensure priority and equal access for persons with disabilities and their networks to vaccines against COVID-19 and the accessibility of health services for persons with disabilities, particularly by developing public health programmes to reach out to the most marginalized persons with disabilities and by providing accessible transportation to health-care centres, including vaccination centres;</p>

Country	Year	Recommendations (health)
		<p>(b) Ensure the development of and promote investment in universal design of medical devices, equipment and health-care facilities and reinforce measures to provide persons with disabilities with information about health care in accessible formats;</p> <p>(c) Ensure that plans for recovery include measures to guarantee the access of persons with disabilities to health care, paying particular attention to persons still in institutions and those in penitentiary facilities;</p> <p>(d) Provide women and girls with disabilities with appropriate and accessible sexual and reproductive health care, and consult with organizations of women with disabilities about gaps and measures to ensure progress in this regard;</p> <p>(e) Develop awareness-raising and training programmes, including in health-related higher education curricula, for medical and health administrative staff about diversity and the rights of persons with disabilities, in close cooperation with organizations of persons with disabilities.</p>
HR	2015	36. The Committee recommends that the State party take immediate steps to ensure that all persons with disabilities have access to inclusive quality primary, secondary and tertiary education and that reasonable accommodation is provided in mainstream education. It also recommends establishing the principle that exclusionary and segregated education is discriminatory. It recommends that teachers and other professionals receive training on inclusive education and that all secondary education facilities be made accessible to persons with disabilities.
HU	2022	<p>51. Taking into account the links between article 25 of the Convention and targets 3.7 and 3.8 of the Sustainable Development Goals, the Committee recommends that the State party:</p> <p>(a) Develop action plans to ensure the accessibility and availability of health - care facilities, services and equipment for persons with disabilities across the State Party, with a specific emphasis on the sexual and reproductive health of women with disabilities, as well as on accessible information and communication for autistic persons, persons with intellectual disabilities and persons with visual and hearing impairments in general treatment in the health - care system;</p> <p>(b) Develop training programmes, including in universities and in-service training curricula, for health - care professionals on the needs and rights of persons with disabilities.</p>
IE		[Not yet scheduled].
IT	2016	<p>56. The Committee recommends that the State party implement an action plan – with sufficient resources, timelines and specific goals – aimed at monitoring the implementation of laws, decrees and regulations to improve the quality of inclusive education in classrooms, support provisions and teacher training across all levels. It also recommends that the State party be guided by article 24 of the Convention, including its general comment No. 4 (2016) on the right to inclusive education, in implementing targets 4.5 and 4 (a) of the Sustainable Development Goals, to ensure equal access to all levels of education and vocational training, and build and upgrade education facilities that are disability-sensitive and safe.</p> <p>58. The Committee recommends that the State party monitor and provide highly qualified sign language interpreters for any deaf child who requests such assistance, and to desist from recommending general communication assistants as an exclusive alternative.</p> <p>60. The committee recommends that the State party undertake, through legislative and other measures, including the newly drafted decree on education, to guarantee the availability of accessible learning materials and the provision of assistive technology in a timely manner in order to ensure inclusive and quality education in the mainstream setting.</p>
LT	2016	<p>46. The Committee recommends that the State party adopt and implement a coherent strategy on inclusive education in the mainstream educational system in accordance with article 24 of the Convention and with reference to Sustainable Development Goal 4, especially its targets 4.5 and 4.8. Through such a strategy, the State party should:</p> <p>(a) Ensure the accessibility of school environments, the provision of reasonable accommodation, accessible and adapted materials and curricula, and the</p>

Country	Year	Recommendations (health)
		<p>compulsory pre-service and in-service training of all teachers on inclusive education;</p> <p>(b) Secure a sufficient number of accessible means of transport to accommodate the needs of students with disabilities;</p> <p>(c) Set clear timelines, targets, baselines and indicators to secure time-bound and measurable progress;</p> <p>(d) Allocate effective and adequate financial, material and adequately trained human resources.</p> <p>47. The Committee recommends that the State party guarantee a legally enforceable right to inclusive, quality and free primary education and to affordable secondary education on an equal basis with others.</p> <p>48. The Committee also recommends that the State party facilitate access for persons with disabilities to tertiary education and vocational training, including through the provision of reasonable accommodation in higher education.</p>
LU	2017	<p>43. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, especially its targets 4.5 and 4.8, the Committee recommends that the State party:</p> <p>(a) Amend the laws on education to ensure that no student is refused admission to mainstream schools on the basis of disability, ensure accessibility and allocate the resources necessary to guarantee reasonable accommodation, including assistant support staff, including pre-school and tertiary education and the private sector;</p> <p>(b) Adopt a legally defined procedure for the provision of reasonable accommodation at all levels of education and allocate the resources necessary to guarantee reasonable accommodation according to individual requirements in consultation with the person concerned;</p> <p>(c) Design and implement an action plan on inclusive education with sufficient resources, timelines and specific goals;</p> <p>(d) Increase awareness-raising initiatives, including training on inclusive education and its implementation mandatory for teachers, support teachers and non-teaching education personnel;</p> <p>(e) Increase data collection on, among others, the implementation of education laws and policies, and accessibility of school infrastructures, information and communications, including information and communications technology, to inform inclusive education policies.</p>
LV	2017	<p>41. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, especially targets 4.5 and 4 (a) thereof, the Committee urges the State party to ensure that no child is refused admission to mainstream schools on the basis of disability, and that it further allocate the resources necessary to guarantee reasonable accommodation to facilitate the accessibility of all students with disabilities to quality, inclusive education, including in preschool, tertiary and lifelong learning institutions.</p>
MT	2018	<p>36. Recalling its general comment No. 4 (2016) on the right to inclusive education and Goal 4 of the Sustainable Development Goals, especially targets 4.5 and 4.a, the Committee recommends that the State party:</p> <p>(a) Ensure the implementation of its laws on education, and accelerate the adoption process of the bill on the Convention, to ensure that violations of the rights under article 24 of the Convention become justiciable in the State party;</p> <p>(b) Adopt measures to ensure that students with disabilities, including students with intellectual or psychosocial disabilities, are provided with reasonable accommodation at all levels of education, and allocate the resources necessary to guarantee reasonable accommodation according to individual requirements in consultation with the person concerned, including the provision of learning support educators and their replacements when they are absent;</p> <p>(c) Ensure accessible mechanisms for accountability and redress in cases in which educational institutions, such as childcare centres and summer schools, or teachers discriminate against students on the basis of their disability;</p>

Country	Year	Recommendations (health)
		<p>(d) Review the curriculum of students with disabilities through individualized education plans to ensure that the curricula allow them to learn the skills required to access the job market on an equal basis with others;</p> <p>(e) Carry out research on the extent to which accessibility standards are being complied with in the State party to obtain a full understanding of the barriers persons with disabilities face in the education system and the solutions required to enable their full participation, and to make research findings on the socioeconomic and cultural benefits of inclusive education available to all relevant stakeholders.</p>
NL		[Not yet scheduled].
PL	2018	<p>42. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, targets 4.5 and 4 (a), the Committee recommends that the State party:</p> <p>(a) Enact specific provisions to support the implementation of reasonable accommodation, individualized learning curriculum and inclusive classroom teaching in accessible learning environments;</p> <p>(b) Support measures for schools, including support for teachers, to advance inclusive education for students with moderate or severe disabilities;</p> <p>(c) Raise awareness among parents of non-disabled children about the advantages of inclusive education for all, and provide training for school masters and teachers on inclusive education methods and best practices.</p>
PT	2016	<p>45. The Committee recommends that the State party, in close consultation with organizations representing persons with disabilities, review its legislation on education to bring it into line with the Convention and take measures to provide additional resources and materials to facilitate access to and enjoyment of inclusive education of high quality for all students with disabilities, providing public schools with the resources they need to ensure the inclusion of all students with disabilities in ordinary classrooms.</p> <p>46. The Committee recommends that the State party consider the relationship between article 24 of the Convention and targets 4.5 and 4.a of the Sustainable Development Goals to ensure equal access to all levels of education and vocational training, as well as to build and upgrade education facilities to make them disability-sensitive and safe.</p> <p>48. The Committee recommends that the State party introduce in its legislation regulations on the access of students with disabilities to higher education and vocational training on an equal basis with other students, while providing reasonable accommodation and the required support services.</p>
RO		[Not yet scheduled].
SE	2014	<p>48. The Committee urges the State party to guarantee the inclusion of all children with disabilities in the mainstream education system and ensure that they have the required support.</p>
SI	2018	<p>40. Recalling its general comment No. 4 (2016) on the right to inclusive education and targets 4.5 and 4.a of the Sustainable Development Goals, the Committee recommends that the State party:</p> <p>(a) Recognize the right of all children with disabilities to inclusive education and abandon segregated education schemes;</p> <p>(b) Adopt a strategy and action plan with a clear time frame for the implementation of inclusive education at all levels for all children with disabilities and, further, establish a comprehensive monitoring system to assess the progress of inclusive education;</p> <p>(c) Strengthen the capacity of inclusive schools to train teachers in inclusive education, curriculum accommodation and teaching methods. The State party should enhance the quality of educational support by adopting an individualized approach to children with disabilities and their capacity-building;</p> <p>(d) Provide lifelong learning for persons with disabilities and ensure accessibility and reasonable accommodation in all tertiary education institutions, including vocational and higher education schools; (e) Provide transport services for students with disabilities from their place of residence to their education facilities.</p>

Country	Year	Recommendations (health)
SK	2016	<p>68. The Committee recommends that the State party pay attention to the links between article 24 of the Convention and targets 4.5 and 4 (a) of the Sustainable Development Goals. The Committee also recommends that the State party:</p> <p>(a) Introduce an enforceable right to inclusive and quality education in the Education Act, including by defining inclusive education in accordance with the Incheon Declaration on education 2030: towards inclusive and equitable quality education and lifelong learning for all of the United Nations Educational, Scientific and Cultural Organization, and Sustainable Development Goal No. 4;</p> <p>(b) Adopt a legally binding plan for the transition from segregated schools into inclusive education at all levels, including by setting timelines, identifying responsible authorities, and allocating adequate resources;</p> <p>(c) Ensure that all children with disabilities who so require have access to personal assistance and allocate resources for this purpose;</p> <p>(d) Ensure available, accessible and inclusive preschool education for all children with disabilities;</p> <p>(e) Put an end to the process of placing Roma children in segregated schools for children with disabilities on the basis of their ethnic background.</p>

4.2.3 Recommendations relevant to education and training

Table 16: UN Recommendations to Member States under Article 24 CRPD (education)

Country	Year	Recommendations (education)
AT	2013	<p>43. The Committee recommends that greater efforts be made to support students with disabilities in all areas of inclusive education from kindergarten to secondary school. It particularly recommends that the State party ensure that persons with disabilities, including children with disabilities and their representative organizations, are involved in the day-to-day implementation of the inclusive education models introduced in various Länder. The Committee further recommends that greater efforts be made to enable persons with disabilities to study at universities and other tertiary institutions. The Committee also recommends that the State party step up its efforts to provide quality teacher training to teachers with disabilities and teachers with sign language skills, so as to enhance the education of deaf and hearing-impaired girls and boys, in accordance with the formal recognition of Austrian sign language in the Constitution of Austria.</p>
BE	2014	<p>37. The Committee requests that the State party implement a coherent inclusive education strategy for children with disabilities in the mainstream system and ensure the provision of adequate financial, material and human resources. It recommends that the State party ensure that children with disabilities receive the educational support they need, in particular through the provision of accessible school environments, reasonable accommodation, individual learning plans, assistive technology in classrooms, and accessible and adapted materials and curricula, and guarantee that all teachers, including teachers with disabilities, receive comprehensive training on the use of Braille and sign language with a view to improving the education of all children with disabilities, including boys and girls who are blind, deaf-blind, deaf or hard of hearing. The Committee also recommends that inclusive education should form an integral part of teacher training at university and during continuing professional development.</p>
BG	2018	<p>50. The Committee recommends that the State party, in accordance with general comment No. 4 (2016) on the right to inclusive education:</p> <p>(a) Replace segregated education systems with quality inclusive education;</p> <p>(b) Raise awareness of the advantages of quality inclusive education for society, in particular for teachers and other education staff, and also for parents of children without disabilities;</p> <p>(c) Intensify its efforts to ensure quality inclusive education and the provision of reasonable accommodation for students with disabilities in mainstream</p>

Country	Year	Recommendations (education)
		schools, including by allocating sufficient human, technical and financial resources for it; (d) Collect data on the number of children and young people with disabilities not currently enrolled in any form of education, disaggregated by age, sex, type of impairment and place of residence, and develop a strategy to include these children in the mainstream education system.
CY	2017	50. The Committee recommends that the State party: (a) Decide upon a clear legislative scope of inclusive education and monitor its implementation with a view to fully replacing segregated education by inclusive education; (b) Adopt a clear, targeted and adequately funded plan of action that includes access to reasonable accommodation and adequate teacher education and training, and progressively ensure that children and adult learners with disabilities are able to exercise their right to inclusive education; (c) Be guided by general comment No. 4 (2016) and targets 4.5 and 4 (a) of the Sustainable Development Goals in ensuring equal access to all levels and types of education, education facilities and vocational training by persons with disabilities.
CZ	2015	48. The Committee recommends that the State party implement the amended School Act, incorporate inclusive education as the guiding principle of the education system and ensure the admission of children with disabilities in mainstream schools, in line with article 24 of the Convention. The Committee calls upon the State party to intensify its efforts and to allocate sufficient financial and human resources for reasonable accommodations that will enable boys and girls with disabilities, including intellectual disabilities and autism, and deaf-blind children, to receive inclusive quality education.
DE	2015	46. The Committee recommends that the State party: (a) Immediately develop a strategy, action plan, timeline and targets to provide access to a high-quality, inclusive education system across all Länder, including the required financial resources and personnel at all levels; (b) Scale down segregated schools to facilitate inclusion and ensure that the law and policies uphold the duty that mainstream schools enrol children with disabilities with immediate effect if that is their choice; (c) Ensure that reasonable accommodation is provided at all levels of education and that the right to such accommodation is legally enforceable and justiciable before the courts; (d) Ensure the training of all teachers in inclusive education, increased accessibility of the school environment, materials and curricula, and the provision of sign language in mainstream schools, including at the post-doctoral level.
DK	2014	53. The Committee recommends that the State party amend its legislation to ensure the inclusion of all children with disabilities in the mainstream education system, with adequate support and accommodation, in particular through the provision of adequate training to teachers and other employees in the school system in all parts of the Kingdom of Denmark, in order to ensure quality education for pupils with disabilities. The State party should take measures to address discrepancies in accomplishment rates between pupils with and without disabilities at all levels of education. 55. The Committee recommends that the State party amend its legislation to ensure that all children with disabilities can submit a complaint to an independent authority if they do not receive adequate educational support.
EE	2021	47. Recalling its general comment No. 4 (2016) on the Right to inclusive education and the Sustainable Development Goal 4, target 4.5 and indicator 4 (a), the Committee recommends, that the State party: (a) Develop the strategy for implementing quality inclusive education with specific targets, timelines, budget allocation, and share of responsibilities between national and municipal levels;

Country	Year	Recommendations (education)
		<p>(b) Establish a policy framework that recognises the right of persons with disabilities to seek, individualized supports as reasonable accommodation in education, when so required;</p> <p>(c) Ensure education is an area of life covered under anti-discrimination and includes the denial of reasonable accommodation as a form of discrimination;</p> <p>(d) Provide students with disabilities with assistive compensatory aids and learning materials in alternative/accessible formats, including inclusive digital access, modes and means of communication, including Easy Read, communication aids and assistive and information technology, and ensure teachers fluent in Estonian Sign Language;</p> <p>(e) Take measures, including the provision of technical equipment, and the adoption of regulations to ensure that children with disabilities receive the individualized support required within the quality and inclusive education system during the COVID-19 pandemic period, especially in rural areas and those facing economic hardship, and guarantee for children with chronic diseases equal access to school.</p>
EL	2019	<p>5. Recalling its general comment No. 4 (2016) on the right to inclusive education, and taking into account Sustainable Development Goal 4, especially targets 4.5 and 4.a, the Committee recommends that the State party increase its efforts to guarantee inclusive education, and in particular that it:</p> <p>(a) Adopt and implement a coherent strategy on inclusive education in the mainstream educational system;</p> <p>(b) Ensure the accessibility of school and university environments, in line with the Convention, by promoting universal design, the provision of specific measures and individualized support, such as accessible and adapted materials, inclusive curricula, inclusive information and communication technologies for pupils and students with disabilities, and digital pedagogy;</p> <p>(c) Immediately ensure access to formal education for all refugee, asylum-seeking and migrant children with disabilities, and for Roma children with disabilities;</p> <p>(d) Allocate effective and sufficient financial and material resources and adequately and regularly trained personnel, including persons with disabilities, to effectively guarantee inclusive education;</p> <p>(e) Incorporate inclusive education training into higher education curricula for trainee teachers, and into training programmes for current teaching staff, with an adequate budget.</p>
ES	2011	<p>44. The Committee reiterates that denial of reasonable accommodation constitutes discrimination and that the duty to provide reasonable accommodation is immediately applicable and not subject to progressive realization. It recommends that the State party:</p> <p>(a) Increase its efforts to provide reasonable accommodation in education, by: allocating sufficient financial and human resources to implement the right to inclusive education; paying particular attention to assessing the availability of teachers with specialist qualifications; and ensuring that educational departments of local governments understand their obligations under the Convention and act in conformity with its provisions;</p> <p>(b) Ensure that the decisions to place children with a disability in a special school or in special classes, or to offer them solely a reduced-standard curriculum, are taken in consultation with the parents;</p> <p>(c) Ensure that the parents of children with disabilities are not obliged to pay for the education or for the measures of reasonable accommodation in mainstream schools;</p> <p>(d) Ensure that decisions on placing children in segregated settings can be appealed swiftly and effectively.</p>
FI		[Not yet scheduled].
FR	2019	<p>51. The Committee recalls its general comment No. 4 (2016) on the right to inclusive education and targets 4.5 and 4.a of the Sustainable Development Goals, and recommends that the State party strengthen measures to attain</p>

Country	Year	Recommendations (education)
		<p>quality, inclusive education for all children with disabilities, including in the overseas territories. The State party should promptly implement the recommendations issued by the Special Rapporteur on the rights of persons with disabilities in this regard. The Committee also recommends that the State party:</p> <p>(a) Develop systems to collect data on children with disabilities disaggregated by age, place of residence, sex and ethnic background, including information about the percentage of enrolment in and attendance at school, and ensure that Roma, asylum-seeking and refugee children with disabilities and children with disabilities who are in an irregular migration situation have effective access to education;</p> <p>(b) Adopt systems for parents and legal tutors to complain and seek redress in cases of refusal to admit their children to a school on the basis of disability;</p> <p>(c) Develop a framework recognizing the right of children with disabilities to seek individualized support through the provision of reasonable accommodation to meet their individual educational requirements, including accommodations in the context of examinations for children with disabilities, particularly autistic children and children with Down syndrome;</p> <p>(d) Adopt programmes at the municipal level and involving public and private actors to provide support for children with disabilities in the context of the COVID-19 pandemic;</p> <p>(e) Ensure that education in French Sign Language is provided at early stages of education and promote the deaf culture in inclusive educational environments;</p> <p>(f) Ensure the effective learning, teaching and use of Braille and Easy Read for persons who are blind and visually impaired and persons with intellectual disabilities;</p> <p>(g) Take measures to eliminate abuse against and bullying of children with disabilities in schools;</p> <p>(h) Adopt programmes with specific goals and time frames in order to promote the access of persons with disabilities to higher education, ensuring that young persons with disabilities can seek individualized support through the provision of reasonable accommodation in tertiary education, including to facilitate their international mobility, and access to sign languages.</p>
HR	2015	<p>36. The Committee recommends that the State party take immediate steps to ensure that all persons with disabilities have access to inclusive quality primary, secondary and tertiary education and that reasonable accommodation is provided in mainstream education. It also recommends establishing the principle that exclusionary and segregated education is discriminatory. It recommends that teachers and other professionals receive training on inclusive education and that all secondary education facilities be made accessible to persons with disabilities.</p>
HU	2012-2022	<p>49. Recalling its general comment No. 4 (2016) and target 4.5 and indicator 4.a of the Sustainable Development Goals, the Committee recommends that the State party:</p> <p>(a) Revise its Public Education Act with the aim of eliminating all discriminatory provisions regarding the education of children with disabilities and explicitly provide for quality inclusive education to ensure that no child with disabilities is excluded from the general education system on the basis of impairment;</p> <p>(b) Ensure access to the general education system in the community and provide the necessary reasonable accommodations for all children with disabilities on an equal basis with other children;</p> <p>(c) Guarantee access to regular education facilities and transportation for children with physical disabilities in their communities across the State party;</p> <p>(d) Provide comprehensive and focused training for general education teachers and administrative staff on the principles and methods of inclusive education, the capacities of children with disabilities and the individualized support measures required by children with disabilities;</p>

Country	Year	Recommendations (education)
		<p>(e) Provide access to the general education for deaf and hard-of-hearing children and promote bilingual education opportunities within an inclusive educational setting, particularly through quality sign language and other support that is required;</p> <p>(f) Ensure the accessibility of regular vocational education facilities and programmes for all children with disabilities, particularly for autistic children and children with intellectual disabilities, through measures of universal design and reasonable accommodation;</p> <p>(g) Take measures aimed at ensuring access to inclusive, high-quality and free primary, secondary and vocational education for children with disabilities, including Roma children, on an equal basis with others.</p> <p>41. The Committee calls upon the State party to allocate sufficient resources for the development of an inclusive education system for children with disabilities. It reiterates that denial of reasonable accommodation constitutes discrimination and recommends that the State party significantly increase its efforts to: provide reasonable accommodation to children with disabilities based on the student's individual requirements; provide students with disabilities with the required support within the general education system; and to continue training teachers and all other educational staff to enable them to work in inclusive educational settings.</p> <p>42. The Committee urges the State party to develop programmes to ensure that Roma children with disabilities are included in mainstream education programmes, without disregarding the provision of reasonable accommodation that might be needed to obtain the desired outcome.</p>
IE		[Not yet scheduled].
IT	2016	<p>56. The Committee recommends that the State party implement an action plan – with sufficient resources, timelines and specific goals – aimed at monitoring the implementation of laws, decrees and regulations to improve the quality of inclusive education in classrooms, support provisions and teacher training across all levels. It also recommends that the State party be guided by article 24 of the Convention, including its general comment No. 4 (2016) on the right to inclusive education, in implementing targets 4.5 and 4 (a) of the Sustainable Development Goals, to ensure equal access to all levels of education and vocational training, and build and upgrade education facilities that are disability-sensitive and safe.</p> <p>58. The Committee recommends that the State party monitor and provide highly qualified sign language interpreters for any deaf child who requests such assistance, and to desist from recommending general communication assistants as an exclusive alternative.</p> <p>60. The committee recommends that the State party undertake, through legislative and other measures, including the newly drafted decree on education, to guarantee the availability of accessible learning materials and the provision of assistive technology in a timely manner in order to ensure inclusive and quality education in the mainstream setting.</p>
LT	2016	<p>46. The Committee recommends that the State party adopt and implement a coherent strategy on inclusive education in the mainstream educational system in accordance with article 24 of the Convention and with reference to Sustainable Development Goal 4, especially its targets 4.5 and 4.8. Through such a strategy, the State party should:</p> <p>(a) Ensure the accessibility of school environments, the provision of reasonable accommodation, accessible and adapted materials and curricula, and the compulsory pre-service and in-service training of all teachers on inclusive education;</p> <p>(b) Secure a sufficient number of accessible means of transport to accommodate the needs of students with disabilities;</p> <p>(c) Set clear timelines, targets, baselines and indicators to secure time-bound and measurable progress;</p>

Country	Year	Recommendations (education)
		<p>(d) Allocate effective and adequate financial, material and adequately trained human resources.</p> <p>47. The Committee recommends that the State party guarantee a legally enforceable right to inclusive, quality and free primary education and to affordable secondary education on an equal basis with others.</p> <p>48. The Committee also recommends that the State party facilitate access for persons with disabilities to tertiary education and vocational training, including through the provision of reasonable accommodation in higher education.</p>
LU	2017	<p>43. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, especially its targets 4.5 and 4.8, the Committee recommends that the State party:</p> <p>(a) Amend the laws on education to ensure that no student is refused admission to mainstream schools on the basis of disability, ensure accessibility and allocate the resources necessary to guarantee reasonable accommodation, including assistant support staff, including pre-school and tertiary education and the private sector;</p> <p>(b) Adopt a legally defined procedure for the provision of reasonable accommodation at all levels of education and allocate the resources necessary to guarantee reasonable accommodation according to individual requirements in consultation with the person concerned;</p> <p>(c) Design and implement an action plan on inclusive education with sufficient resources, timelines and specific goals;</p> <p>(d) Increase awareness-raising initiatives, including training on inclusive education and its implementation mandatory for teachers, support teachers and non-teaching education personnel;</p> <p>(e) Increase data collection on, among others, the implementation of education laws and policies, and accessibility of school infrastructures, information and communications, including information and communications technology, to inform inclusive education policies.</p>
LV	2017	<p>41. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, especially targets 4.5 and 4 (a) thereof, the Committee urges the State party to ensure that no child is refused admission to mainstream schools on the basis of disability, and that it further allocate the resources necessary to guarantee reasonable accommodation to facilitate the accessibility of all students with disabilities to quality, inclusive education, including in preschool, tertiary and lifelong learning institutions.</p>
MT	2018	<p>36. Recalling its general comment No. 4 (2016) on the right to inclusive education and Goal 4 of the Sustainable Development Goals, especially targets 4.5 and 4.a, the Committee recommends that the State party:</p> <p>(a) Ensure the implementation of its laws on education, and accelerate the adoption process of the bill on the Convention, to ensure that violations of the rights under article 24 of the Convention become justiciable in the State party;</p> <p>(b) Adopt measures to ensure that students with disabilities, including students with intellectual or psychosocial disabilities, are provided with reasonable accommodation at all levels of education, and allocate the resources necessary to guarantee reasonable accommodation according to individual requirements in consultation with the person concerned, including the provision of learning support educators and their replacements when they are absent;</p> <p>(c) Ensure accessible mechanisms for accountability and redress in cases in which educational institutions, such as childcare centres and summer schools, or teachers discriminate against students on the basis of their disability;</p> <p>(d) Review the curriculum of students with disabilities through individualized education plans to ensure that the curricula allow them to learn the skills required to access the job market on an equal basis with others;</p> <p>(e) Carry out research on the extent to which accessibility standards are being complied with in the State party to obtain a full understanding of the barriers persons with disabilities face in the education system and the solutions required</p>

Country	Year	Recommendations (education)
		to enable their full participation, and to make research findings on the socioeconomic and cultural benefits of inclusive education available to all relevant stakeholders.
NL		[Not yet scheduled].
PL	2018	<p>42. Recalling its general comment No. 4 (2016) on the right to inclusive education and Sustainable Development Goal 4, targets 4.5 and 4 (a), the Committee recommends that the State party:</p> <p>(a) Enact specific provisions to support the implementation of reasonable accommodation, individualized learning curriculum and inclusive classroom teaching in accessible learning environments;</p> <p>(b) Support measures for schools, including support for teachers, to advance inclusive education for students with moderate or severe disabilities;</p> <p>(c) Raise awareness among parents of non-disabled children about the advantages of inclusive education for all, and provide training for school masters and teachers on inclusive education methods and best practices.</p>
PT	2016	<p>45. The Committee recommends that the State party, in close consultation with organizations representing persons with disabilities, review its legislation on education to bring it into line with the Convention and take measures to provide additional resources and materials to facilitate access to and enjoyment of inclusive education of high quality for all students with disabilities, providing public schools with the resources they need to ensure the inclusion of all students with disabilities in ordinary classrooms.</p> <p>46. The Committee recommends that the State party consider the relationship between article 24 of the Convention and targets 4.5 and 4.a of the Sustainable Development Goals to ensure equal access to all levels of education and vocational training, as well as to build and upgrade education facilities to make them disability-sensitive and safe.</p> <p>48. The Committee recommends that the State party introduce in its legislation regulations on the access of students with disabilities to higher education and vocational training on an equal basis with other students, while providing reasonable accommodation and the required support services.</p>
RO		[Not yet scheduled].
SE	2014	48. The Committee urges the State party to guarantee the inclusion of all children with disabilities in the mainstream education system and ensure that they have the required support.
SI	2018	<p>40. Recalling its general comment No. 4 (2016) on the right to inclusive education and targets 4.5 and 4.a of the Sustainable Development Goals, the Committee recommends that the State party:</p> <p>(a) Recognize the right of all children with disabilities to inclusive education and abandon segregated education schemes;</p> <p>(b) Adopt a strategy and action plan with a clear time frame for the implementation of inclusive education at all levels for all children with disabilities and, further, establish a comprehensive monitoring system to assess the progress of inclusive education;</p> <p>(c) Strengthen the capacity of inclusive schools to train teachers in inclusive education, curriculum accommodation and teaching methods. The State party should enhance the quality of educational support by adopting an individualized approach to children with disabilities and their capacity-building;</p> <p>(d) Provide lifelong learning for persons with disabilities and ensure accessibility and reasonable accommodation in all tertiary education institutions, including vocational and higher education schools; (e) Provide transport services for students with disabilities from their place of residence to their education facilities.</p>
SK	2016	68. The Committee recommends that the State party pay attention to the links between article 24 of the Convention and targets 4.5 and 4 (a) of the Sustainable Development Goals. The Committee also recommends that the State party:

Country	Year	Recommendations (education)
		<p>(a) Introduce an enforceable right to inclusive and quality education in the Education Act, including by defining inclusive education in accordance with the Incheon Declaration on education 2030: towards inclusive and equitable quality education and lifelong learning for all of the United Nations Educational, Scientific and Cultural Organization, and Sustainable Development Goal No. 4;</p> <p>(b) Adopt a legally binding plan for the transition from segregated schools into inclusive education at all levels, including by setting timelines, identifying responsible authorities, and allocating adequate resources;</p> <p>(c) Ensure that all children with disabilities who so require have access to personal assistance and allocate resources for this purpose;</p> <p>(d) Ensure available, accessible and inclusive preschool education for all children with disabilities;</p> <p>(e) Put an end to the process of placing Roma children in segregated schools for children with disabilities on the basis of their ethnic background.</p>

5 Situation and trend analysis

The most recent microdata for analysis of the situation of persons with disabilities in the EU are time-lagged. They provide a snapshot in 2020 of data collected during the early part of the COVID-19 crisis. The method and timing of data collection was impacted in some Member States. There was a break in time series for Germany, France, Ireland and Luxembourg, and data microdata was not available for Germany and Italy at the time of writing (two of the largest countries). This presents some challenges for Semester trend analysis due to the exceptional circumstances of the intervening crisis, and their impact on outcomes (such as estimated rates of employment or poverty rates). For example, the new Scorecard indicators for the 'disability employment gap', quoted in the 2022 Commission Country Reports, are also based on this preliminary data from EU-SILC as an interim measure, pending the availability of new disability data from the EU Labour Force Survey (EU-LFS). The possibilities for disability data analysis in the Semester will be greatly enhanced once this is available. The 2020 data will be incorporated into the EDE country fiches and supplemented by new data from national sources, where available, but caution should be attached to the interpretation of these data (particularly in interpreting unexpected changes or anomalies).

5.1 A note on the use of EU data

Unless specified, the summary statistics presented in this report are drawn from EU-SILC micro data⁴⁸ or from corresponding statistics published in the Eurostat health database.⁴⁹ The EU-SILC sample includes people living in private households and does not include people living in institutions. The proxy used to identify persons with disabilities (impairments) is whether 'for at least the past 6 months' the respondent reports that they have been 'limited because of a health problem in activities people usually do'.⁵⁰ Response rates to this question vary between countries and national data sources are added in the country reports for comparison, or context, where available. These methodological issues are analysed and explained in some detail in past annual statistical reports published by ANED⁵¹ and summarised in the most recent EDE statistical report.⁵² The underpinning concepts and implementation are also explained on the Eurostat web pages.⁵³

The tables and charts here show the most recent data available for EU27. In most cases, this requires analysis of microdata that is two years old (e.g. presenting EU-SILC estimates from 2020 in 2022). The main indicators may be updated during the

⁴⁸ EU-SILC 2020, Release April 2022 (Extracted on 14 April 2022). These data cover 25 Member States, <https://ec.europa.eu/eurostat/data/database>.

⁴⁹ See: <https://ec.europa.eu/eurostat/web/health/data/database>.

⁵⁰ The SILC survey questions are contained in the Minimum European Health Module (MEHM), [http://epp.eurostat.ec.europa.eu/statistics_explained/index.php/Glossary:Minimum_European_Health_Module_\(MEHM\)](http://epp.eurostat.ec.europa.eu/statistics_explained/index.php/Glossary:Minimum_European_Health_Module_(MEHM)).

⁵¹ Academic Network of European Disability Experts (2020) *Statistical indicators*, <http://www.disability-europe.net/theme/statistical-indicators>.

⁵² European Disability Expertise (EDE) (2021) European comparative data on Europe 2020 and persons with disabilities, Labour market, education, poverty and health, analysis and trends, statistical report including EU SILC data 2020 (not yet published).

⁵³ Eurostat (2015) *Disability statistics introduced*, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability_statistics_introduced.

policy cycle to include the latest year's estimates for some items published by Eurostat (notably for estimates of poverty or social exclusion). This allows for a closer alignment with Commission analyses during the Autumn phase of the Semester. For example, in 2022 the provisional microdata release for analysis did not include the relevant data for Germany and Italy, the two largest Member States, which also affected estimation of the EU27 average (using 2019 data for these countries). Subsequent releases on the Eurostat pages provided updated estimates.

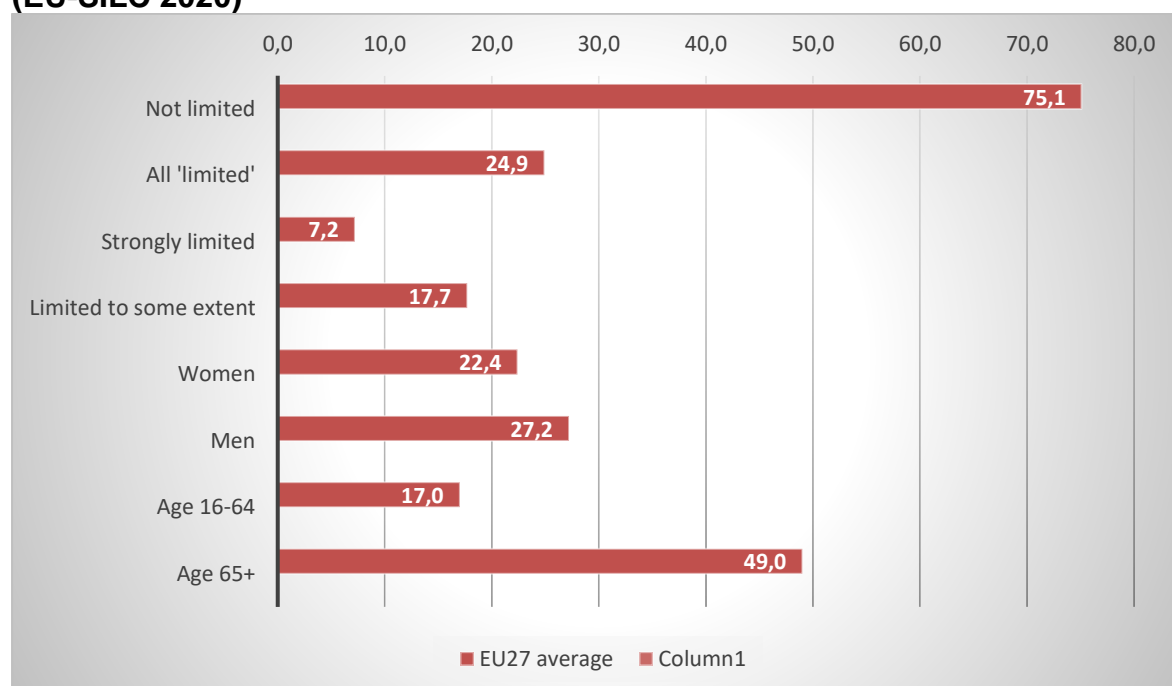
In 2020, one quarter of the EU population, and half those aged 65 and over, experienced limitations in the activities that people normally do and may therefore be considered as disabled to greater or lesser degree. On this measure, the EU population of disabled adults is larger than the total population of any EU Member State

Disability prevalence data is routinely published by Eurostat, and includes estimations for all 27 Member States in 2020.⁵⁴ The data show a continuing year-on-year increase in the overall proportion of the EU population, aged over 16 and living in private households, who report 'activity limitations'. On this measure, persons with disabilities now make up one quarter of the EU adult population (24.9 %) and one half of the population aged 65 and over (49 %). In 2020, more than one in five of the EU population was aged 65 and over and more than half the population aged above 40 years, after which age the rate of onset of impairment also tends to increase.⁵⁵

This pattern reflects demographic trends prior to the full impact of the COVID-19 crisis in 2020 and 2021, and prior to the subsequent influx of refugee populations from Ukraine in 2022. These events may have affected the age distribution in some Member States more than others. Disability data is not collected on the population of children under the age of 16 years in the EU-SILC, and no data is collected from adults living in congregative households (such as residential care homes and hospitals). Persons with disabilities may be over-represented in the latter group, and disproportionately impacted by the pandemic (including excess deaths). The latter group may be particularly The data can be broken down by degree of limitation, gender and age as shown in Figure 1.

⁵⁴ Eurostat (2022) Self-perceived long-standing limitations in usual activities due to health problem by sex, age and labour status (online data code: HLTH_SILC_06), https://ec.europa.eu/eurostat/databrowser/view/hlth_silc_06/default/table?lang=en.

⁵⁵ Eurostat (2020) *Population structure and ageing*, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Population_structure_and_ageing.

Figure 1: Self-reported 'activity limitations' as a proxy for impairment/disability (EU-SILC 2020)

Source: EU-SILC 2020, Release April 2022.

As noted in the EDE statistical reports, the 2019 data showed a slight decrease on the previous year but the 2020 data confirms the underlying trend of increase in the disabled population in line with the ageing demographic of European societies.⁵⁶ This suggests an estimate of more than 110 million people in the EU27 Member States (not including children aged under 16 or persons living in institutions). Of these, more than one quarter declare a severe level of activity limitation (7.2 % of the EU population or more than 30 million people).⁵⁷ This proportion has been rising incrementally due to the ageing demographic (more women than men also declare activity limitation overall due to the gendered pattern of ageing).

Although estimates of disability prevalence from general household survey data should be treated with caution, they do evidence, consistently, that a large group of EU citizens are affected, and they underline the policy significance of disability issues for the EU and its Member States. Indeed, the population of adults who declare a functional impairment is larger than the total population of any one EU Member State.

In subsequent tables, these prevalence data are used as a proxy to estimate 'disability' equality in the main policy areas of employment, education and poverty risk.⁵⁸ Tables are presented by disaggregating the estimated proportion of people who report and do not report limitations for each indicator (e.g. among those who are employed,

⁵⁶ Anomalies in the historical EU trend have arisen from methodological changes or breaks in the time series of some Member States, including Germany and Italy, which affect the average due to the large size of these countries, and by the UK's withdrawal from the EU (France, Germany, Italy and the UK accounted for more than 50 % of the disabled population in EU28).

⁵⁷ Estimates based on an assumed EU27 population of 447 million people in January 2021.

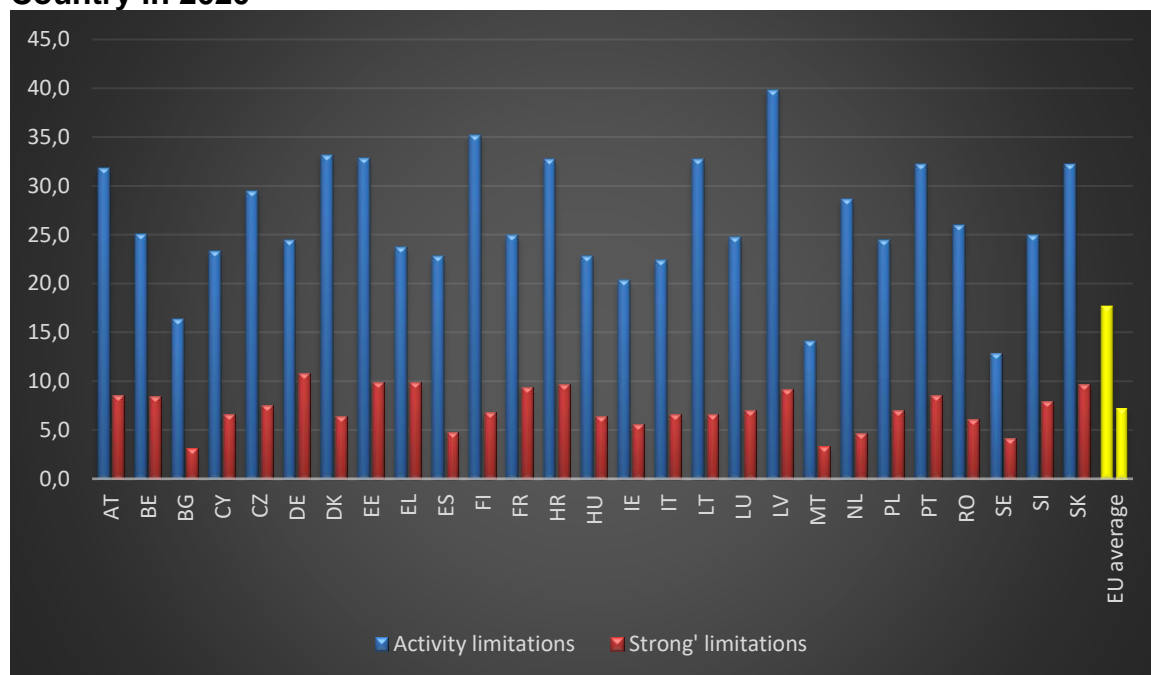
⁵⁸ The methodology is further explained in the annual statistical reports of ANED, available at <http://www.disability-europe.net/theme/statistical-indicators>.

unemployed, at risk of poverty, etc.). The analysis combines this evidence of disability equality outcomes with documentary policy evidence from the EU and Member States.

5.1.1 Variation in prevalence estimates

The range of prevalence estimates for the Member States, in the 2020 EU-SILC data, is shown in Figure 2. There is less variation between countries in the estimate for persons declaring 'strong' limitation in activities (the proxy for severe impairment).

Figure 2: Prevalence of activity limitation and 'strong' limitation (age 16+) by Country in 2020



Estimates of disability prevalence based on self-reporting are prone to variation between countries and age groups, which may be due to differences in survey methodology, sampling or cultural-linguistic responses to questioning about health and impairment. This variation is discussed in the EDE statistical report but, to summarise, we can observe variation in both the estimated rate of prevalence and its range of variation per country and over time. There are also some distinct time-series breaks within individual countries, resulting from changes in national methodology.

Figure 3 plots the annual national averages for all available observations from the past ten years (2011 to 2020) and for those who report more severe levels of limitation/impairment, in Figure 4. From a total of 348 observations in 27 Member States, the lowest observed prevalence rate was 9.7 % in Malta and the highest 41.6 % in Latvia (mean 26.2 %, SD=6.6). The widest in-country variation over this time period was in Germany, due mainly to a change of methodology (with similar anomalies affecting Sweden). This and other country anomalies are explained in the EDE statistical report and previous ANED reports. The range over the most recent three years is almost as wide (11.9 % to 40.1 %, mean 26.5 %) and in 2020 it was 12.9 % to 39.8 % (mean 26.3 %). It is worth noting that, while there is wide variation

in the rate within and between countries, the ranking of countries on this indicator is much less variable.

Figure 3: Simple Boxplot of Prevalence of activity limitation (age 16+) by Country (2011-2020)

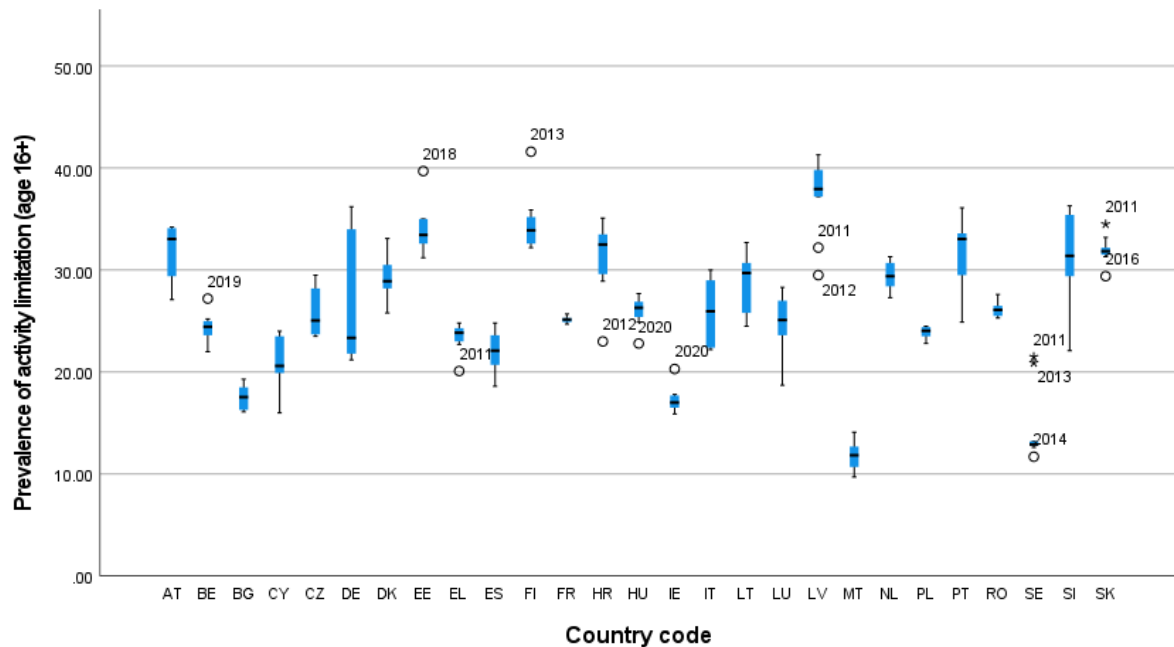
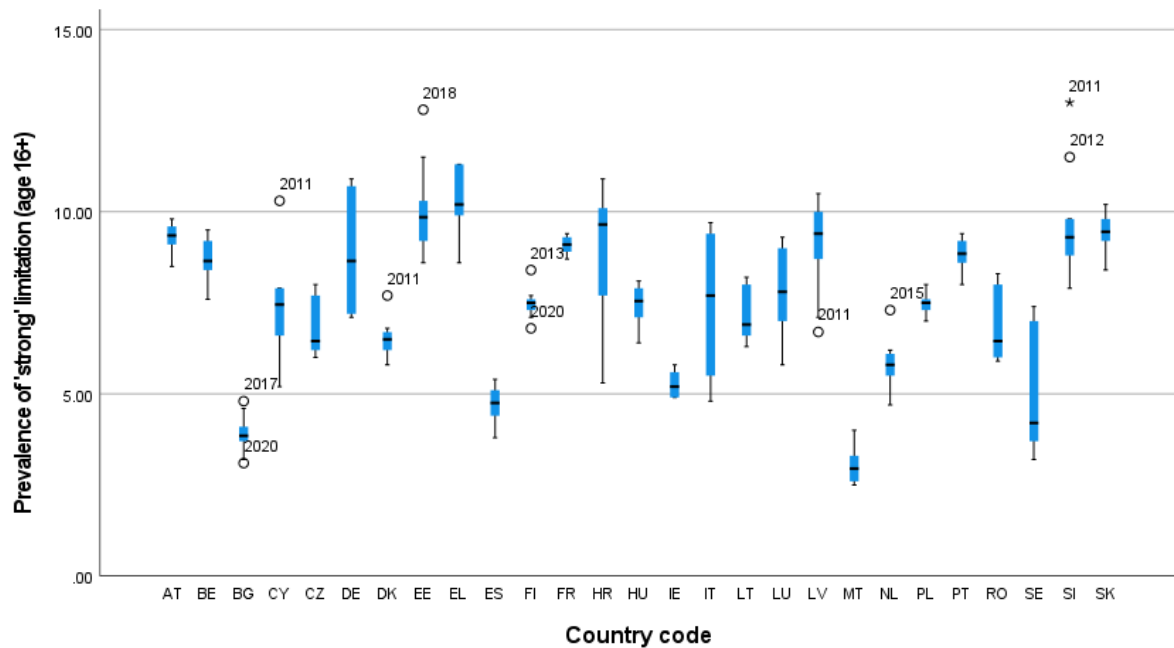


Figure 4: Simple Boxplot of Prevalence of 'strong' limitation (age 16+) by Country (2011-2020)



Variation in disability prevalence estimates is a well-known phenomenon in social surveys.⁵⁹ For example, using the Washington Group Short Set questions may underestimate inequalities on some outcome measures compared to the GALI survey measure.⁶⁰ Such discussions lead to some speculation about the impact that prevalence estimates may have on other dependent variables when used as input to cross-national comparison (e.g. when estimating disability employment rates or disability poverty rates). These impacts of cross-country variation in prevalence are examined later but, overall, do not appear to invalidate broad comparisons if they are considered and controlled as a contributory factor in the analysis (e.g. by noting outliers, using multi-year averages, or adding the variable in regressions). In principle, it might be possible to construct statistical weightings for disability prevalence in the EU-SILC data, but this would require a more advanced analysis than is possible here.

5.2 Disability and inclusion in the labour market

The following analysis draws on the summary statistical tables produced from EU-SILC data by EDE to inform Commission input to the Semester process (and consistent with those produced for ANED since 2008 for the same purpose). Continuity of reporting assists in establishing general patterns and trends, and in controlling for some data variability effects between years. Nevertheless, there are anomalies in the data for 2020, some of which may be due to the COVID-19 crisis, and microdata was not complete for two of the largest Member States (Germany and Italy). This also affects estimation of an EU27 average for comparison. The introduction of disability items into the harmonised core of the Labour Force Survey will present new, and greatly enhanced, opportunities for disaggregation and analysis in future policy cycles. For these reasons, caution is needed when interpreting employment outcomes from the 2020 data and the data available for analysis was incomplete at the time of writing.

5.2.1 Strategic context

Article 27 CRPD refers to a wide range of policy steps that need to be taken, including the prohibition of disability discrimination in ‘all matters concerning all forms of employment’, protecting ‘just and favourable conditions of work’ and ‘labour and trade union rights’, promoting equal opportunities in work and training, and ensuring ‘reasonable accommodation’ is provided in the workplace.⁶¹ The UN CRPD Committee is in process of drafting a General Comment on this Article, which will provide extensive interpretation of these rights. In the consultation process, a number of submissions were made in 2021 by European disability organisations, and by Poland and Italy.⁶²

⁵⁹ Mitra, S., & Sambamoorthi, U. (2014). Disability prevalence among adults: estimates for 54 countries and progress toward a global estimate. *Disability and rehabilitation*, 36(11), 940-947.

⁶⁰ Amilon, A., Hansen, K. M., Kjær, A. A., & Steffensen, T. (2021). Estimating disability prevalence and disability-related inequalities: Does the choice of measure matter?, *Social Science & Medicine*, 272, 113740.

⁶¹ See: <http://www.un.org/disabilities/default.asp?id=287>.

⁶² UN OHCHR (2021) *Call for submissions: Draft General Comment on article 27 on the right of persons with disabilities to work and employment*, <https://www.ohchr.org/en/calls-for-input/calls-input/call-submissions-draft-general-comment-article-27-right-persons>.

In its 2015 Concluding Observations to the EU, the UN CRPD Committee expressed concern at ‘the high unemployment rates for persons with disabilities, especially women with disabilities and persons with intellectual and/or psychosocial disabilities, in comparison with other groups of population in the European Union’. Accordingly:

The Committee recommends that the European Union take effective actions to measure the employment of persons with disabilities and to increase their employment rate in open labour market, including by providing training for Member States on reasonable accommodation and accessibility in the context of employment.⁶³

There is an expectation from the UN that the EU Framework has some competence and responsibility not only to protect non-discrimination rights arising from Directive 2000/78/EC but also in its capacity for the coordination and monitoring of Member States’ employment policies (i.e. in the development of employment statistics and through the advisory process of the European Semester).

The EU disability strategy invoked the Employment Equality Directive and the Social Pillar as a starting point, affirming the right to participate in the labour market without discrimination and to an adapted work environment. It also proposed that ‘participation in employment is the best way to ensure economic autonomy and social inclusion’ (p. 13). The Commission reported on application of the Directive in 2021 (along with application of the Racial Equality Directive), positioning EU disability strategy in context of other related plans for gender equality, anti-racism and LGBTIQ equality, as well as plans to strengthen the Charter and implement the Social Pillar.⁶⁴ This furthers the evidence that disability strategy is becoming more mainstreamed in EU policy co-ordination within a common concern for ‘preventing and tackling discrimination’ and improving data collection. Examples of disability specific actions included awareness raising and guidance developed in 2019-2020, such as the campaign to promote employer good practices in reasonable accommodation.⁶⁵ Further practical policy guidance, and good practice, has been developed by the International Labour Organization (ILO) in recent years.⁶⁶ However, it was also noted from the Commission consultation that some stakeholders faced challenges in understanding the underlying concept of disability, as well as reasonable accommodation (and in applying this).

The Flagship actions detailed in the EU disability strategy for 2022 included a policy package on employment, with a particular focus on interpreting the employment

⁶³ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fEU%2fCO%2f1.

⁶⁴ European Commission (2021) REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the application of Council Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin (‘the Racial Equality Directive’) and of Council Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation (‘the Employment Equality Directive’), COM(2021) 139 final.

⁶⁵ European Commission (2020) How to put reasonable accommodation into practice – guide of promising practices, <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8341>.

⁶⁶ ILO (2021) *Disability and work*, <https://www.ilo.org/global/topics/disability-and-work/lang-en/index.htm>.

guidelines linked to the Semester.⁶⁷ This action was in preparation and consultation with stakeholders at the time of writing (May 2022). It was discussed at the ministerial conference on disability March 2022 (under the French Presidency) with an anticipated launch date in the second half of the year (under the Czech Presidency). Assuming this timeline to completion, the proposed package will be very relevant to disability equality mainstreaming in the 2023 Semester cycle. In addition, it is relevant to note that the Horizon call on 'Overcoming discrimination for an inclusive labour market' requires projects to 'Develop practices that facilitate reduction of employment gaps between vulnerable and mainstream groups, such as persons with disabilities and those without...' (among other groups).⁶⁸

Social entrepreneurship was mentioned, as a contributor to bridging the disability employment gap, in the Social Economy Action Plan in 2021.⁶⁹ The accompanying working paper notes as a main challenge that 'Inclusive enterprises for persons with disabilities are not always considered part of the social economy'.⁷⁰ The concept of inclusive enterprise here refers mainly to Work Integration Social Enterprises (WISEs), private social enterprises that focus on employment, and pathways to employment, for marginalised groups (often including or specifically persons with disabilities). This might involve direct employment, work experience and work preparation activity. Such enterprises are often positioned as a progressive alternative to placing persons with disabilities in sheltered employment outside the mainstream of the labour market. Nevertheless, it is important to ensure that segregative practices are not continued under new policy labels. Careful monitoring and critical evaluation of disability-focused enterprises is always needed in order to establish that they achieve open labour market outcomes.

Labour market segmentation remains a concern in some Member States but this is not observable from headline employment statistics, which present a unified picture of employment gaps rather than insights into employment sectors, job quality or wage differences. Segmentation should be considered among the explanatory factors for analysis at country level, where relevant, and reference to CRPD documentation may help with this. There has been no General Comment from the UN CRPD Committee on employment (Article 27 CRPD) to date⁷¹ but it has viewed structural segregation in the labour market in a similar light to segregated education or institutional care. For example, in its 2015 Concluding Observations to Germany, the Committee expressed concern about 'segregation in the labour market' and 'the fact that segregated,

⁶⁷ European Commission (2022) Union of equality: Strategy for the rights of persons with disabilities 2021-2030 - Monitoring Framework, <https://ec.europa.eu/social/main.jsp?catId=1552&langId=en>.

⁶⁸ Overcoming discrimination for an inclusive labour market, TOPIC ID: HORIZON-CL2-2022-TRANSFORMATIONS-01-06, <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/horizon-cl2-2022-transformations-01-06>.

⁶⁹ European Commission (2021) *Building an economy that works for people: an action plan for the social economy*, <https://ec.europa.eu/social/BlobServlet?docId=24986&langId=en>.

⁷⁰ European Commission (2021) *Commission Staff Working Document accompanying the action plan for the social economy*, SWD(2021) 373 final, <https://ec.europa.eu/social/BlobServlet?docId=24989&langId=en>.

⁷¹ See: <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/GC.aspx>.

sheltered workshops fail to prepare workers for or promote transition to the open labour market'.⁷² Similarly, in 2021, France was recommended to:

Move towards eradicating all forms of segregated work, strengthen measures to effectively abolish sheltered employment and adopt a time-bound policy and benchmarks to ensure that all persons with disabilities have access to work and employment in the open labour market, regardless of the type of impairment or level of support required, and their meaningful inclusion in work environments, in the private and public sectors...⁷³

Understanding the extent to which employment policies integrate or marginalise job search and placement for persons with disabilities is a relevant concern for analysis. Labour market segmentation has disability implications also for the Social Pillar concerns with equality, labour rights and wage setting.⁷⁴ The Commission's guidance on equality mainstreaming in preparation of the 2021 RRP also provided a useful model for the development of future guidance on Semester plans and situational analyses. This would assist the co-ordination between European Semester and UN CRPD processes (i.e. in harmonising key policy messages from the CRPD with National Reform Programmes and Commission Country Reports).

5.2.2 Disability and employment rates

Data on the employment situation of persons with disabilities is presented in the EDE statistical review accompanying this synthesis report, using the most recent disability data from 2020 (where available in the microdata). This includes some comparisons between Eurostat's employment estimations for the general population (based on EU-LFS data) and EDE's disability indicators (based on EU-SILC data). The EU-SILC indicators provide interim estimates for disability employment in anticipation of new reporting from the EU-LFS (e.g. disability statistics cannot be disaggregated from the same source as gender employment statistics until this becomes available). Some individual Member States do report the employment situation of persons with disabilities from national labour surveys and, where available, this should be shown in country reports for comparison.

There is some variation between estimations based on EU-LFS and those based on EU-SILC. The two surveys adopt different definitions of employment and EU-SILC produces an estimated employment rate for the general population that averages slightly lower than the LFS estimate⁷⁵ but the evolution of the two surveys remained strongly correlated over the past decade, and previous findings have proved sufficiently consistent to justify their reliability as indicators of significant gaps and

⁷² See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fDEU%2fCO%2f1.

⁷³ See: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fFRA%2fCO%2f1.

⁷⁴ These were addressed in the Social Pillar analysis provided by ANED in 2016-17, <https://www.disability-europe.net/downloads/870-mainstreaming-disability-rights-in-the-european-pillar-of-social-rights-a-compendium>.

⁷⁵ This is due mainly to slight differences in definition and methodology, and of sampling and seasonal factors, which were demonstrated in previously published EDE and ANED statistical reports.

trends. Nevertheless, measurement differences between surveys are larger in some Member States than others, and some recalibration will need to be accommodated in the transition from one measurement to the other in 2023. Retrospective trend analysis will not be available for the new EU-LFS indicator and so the EU-SILC estimation retains analytical value in this regard.

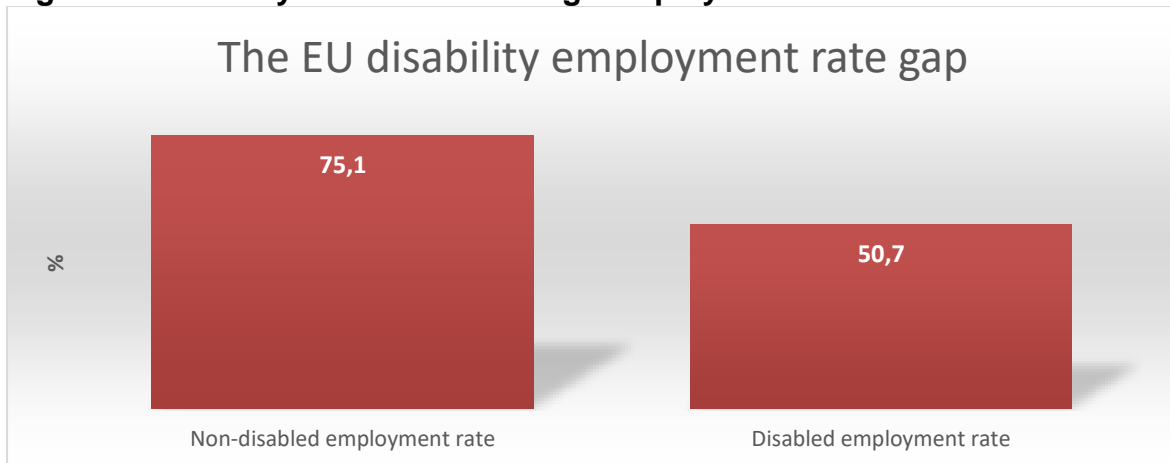
The forthcoming publication of disability statistics from the EU-LFS core will be a major step forward in mainstreaming disability equality in the 2023 Semester. In the interim, Eurostat has published retrospective statistics on the disability employment gap, in percentage points, using EU-SILC data (but did not publish the employment rates from which the gap was calculated).⁷⁶ This interim estimation used a slightly different data definition of employment to the estimates produced by EDE (and by ANED over the previous decade).⁷⁷ This is the measure used in the Social Scorecard for the disability employment gap in 2022, and cited in the Commission Country Reports.

Using EDE's EU-SILC estimation, at the European level in 2020, the employment rate of persons with disabilities for the EU27 was about 50.7 % compared to 75.1 % for other persons (on this measure, the total population employment rate in the EU was 70.8 % compared to 71.7 % in the EU-LFS, for persons aged 20-64), as shown in Figure 5. On this measure, the EU disability employment rate rose above 50 % for the first time in 2017 (when the UK was also included) and was rising slightly faster than the general employment rate prior to the COVID-19 pandemic, causing the disability equality gap to narrow below 25 points. The disability employment gap shown in the Scorecard (using Eurostat's interim measure) was 24.3 percentage points in 2020.

In summary, there was gradual improvement in the disability employment situation during the years preceding the COVID-19 crisis but only modest measurable improvement in the disability employment gap. The early impact of the crisis was already visible in employment rate reductions in 2020 but these were small. In a strong labour market, with labour shortages highlighted in several countries, there remained considerable under-utilised labour potential among persons with disabilities. The low rate of employment among persons with disabilities reduces the EU's overall employment rate by more than 4 percentage points. As new data emerges concerning the economic shock it will be important to analyse whether the relative gains of the past decade have been preserved or forfeited for persons with disabilities in the EU, although indications of trend require caution when there are time series breaks in data definition.

⁷⁶ Disability employment gap by level of activity limitation and sex (source EU-SILC) (hlth_dlm200) https://ec.europa.eu/eurostat/data/database?node_code=hlth_dlm200.

⁷⁷ While the EDE estimates consider self-reported employment status (and age) at the date of the survey interview, the interim Scoreboard measure considers persons who were employed (salaried, non-salaried, other employed) for more than 50% of the 12 month reference period.

Figure 5: Disability and the EU average employment rate in 2020

Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

In 2022, the Commission Country Reports included the Scorecard indicator for the disability employment gap for the first time and categorised each country according to a ranking order (shown in Table 17). The validity of the gap measure is considered in more detail later and compared with measures of employment ratio.

Table 17: Categorisation of 2020 disability employment gaps in the Social Scorecard 2022

MS	Scoreboard Categorisation	Disability employment gap based on Eurostat interim measure (pps) cited in the Social Scoreboard	Disability employment gap based on EDE estimates of employment rates (pps)
IE	Watch but improving	38.6	42.8
BE	Critical situation	36.3	35.9
BG	Critical situation	33.0	32.4
HR	Critical situation	32.9	32.5
DE	Critical situation	32.4	28.3
PL	To watch	31.3	32.5
HU	To watch	31.2	31.0
RO	To watch	30.4	28.9
MT	To watch	29.4	33.0
SE	To watch	28.9	28.2
EL	On average	27.7	28.3
CZ	On average	25.6	26.8
NL	On average	25.4	24.6
SK	On average	23.6	24.6
CY	On average	23.5	24.5
FR	To watch	22.8	24.0
LT	Better than average	22.7	23.6
LU	Better than average	22.1	20.7
SI	Good but to monitor	21.7	23.2
ES	Better than average	21.6	21.5
EE	Better than average	20.6	22.9
AT	Better than average	20.5	22.1
FI	Better than average	19.9	19.7
PT	Best performers	18.2	18.2
DK	Best performers	18.1	20.4
LV	Best performers	16.7	16.2
IT	Best performers	14.9	16.6

Source: adapted from the 2022 Social Scoreboard and Semester Country Reports

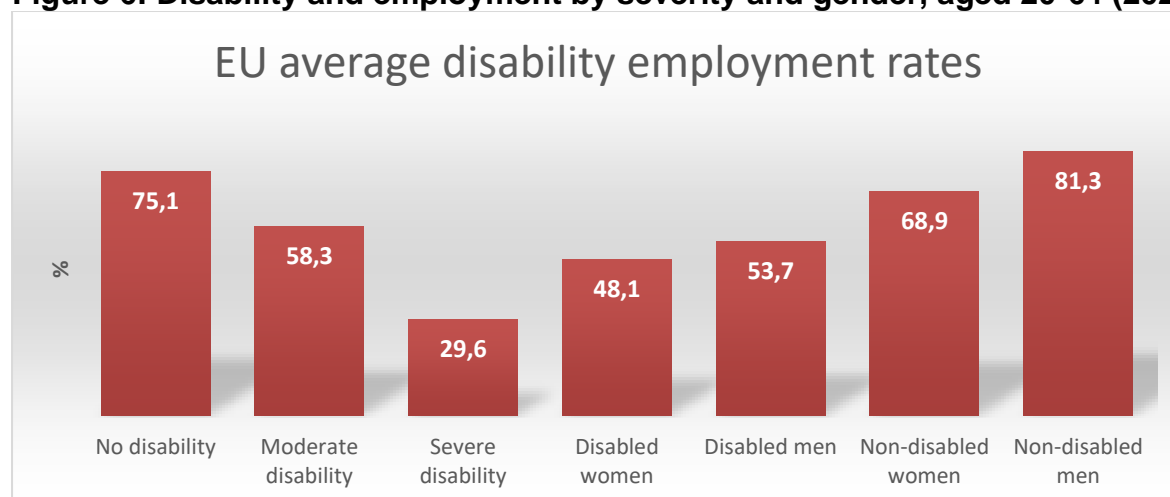
Employment rates were notably lower among persons with disabilities than among other persons in every EU Member State (Figure 7) but the estimated disability employment gap varies widely between countries (as shown in Figure 8). Using either method, the disability employment rate was below 40 % in Ireland, Greece and Croatia. It was above 60 % in Latvia and Estonia using EDE's measure (and in Denmark, Finland, Lithuania and Portugal using Eurostat's measure). On the Scorecard indicator, the disability employment gap was above 35 percentage points in Ireland and Belgium but below 20 points in Italy, Latvia, Denmark and Portugal. These observations should be contextualised for methodological factors as explained above.

The differences in data definition affect the estimates for different countries in different ways. For example, the disability employment rate in Austria, Cyprus, Denmark,

Estonia, Spain and Ireland was more than three percentage points higher using the Scorecard method than the EDE method. This may seem counterintuitive, as the definition of at least 50 % employment in the past 12 months is more restrictive, but reported lack of employment on the day of the survey (EDE method) could be more affected by COVID-19 measures in 2020 (and the employment rate of persons without disabilities was similarly affected in these countries, to slightly lesser degree). Only in Belgium, Bulgaria, Netherlands and Romania was the estimated disability employment rate higher on the EDE measure (and only in Romania by more than one percentage point). Given the unusual circumstances in 2020 caution is needed in all cases.

Figure 6 shows a breakdown of employment rate estimates for women and men, and for persons with different levels of impairment, at the EU level. A similar table is shown for each country in the EDE country fiches, compared to the EU27 average. For continuity, this uses the same method as previous EDE and ANED fiches contributing to the Semester.

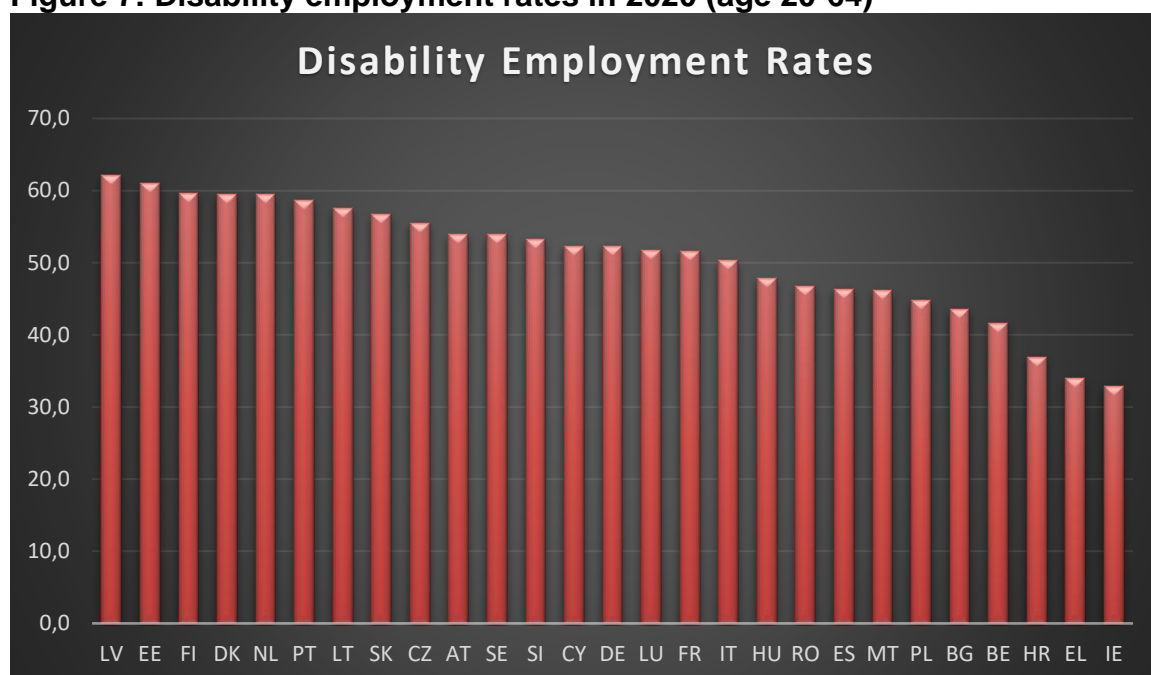
Figure 6: Disability and employment by severity and gender, aged 20-64 (2020)



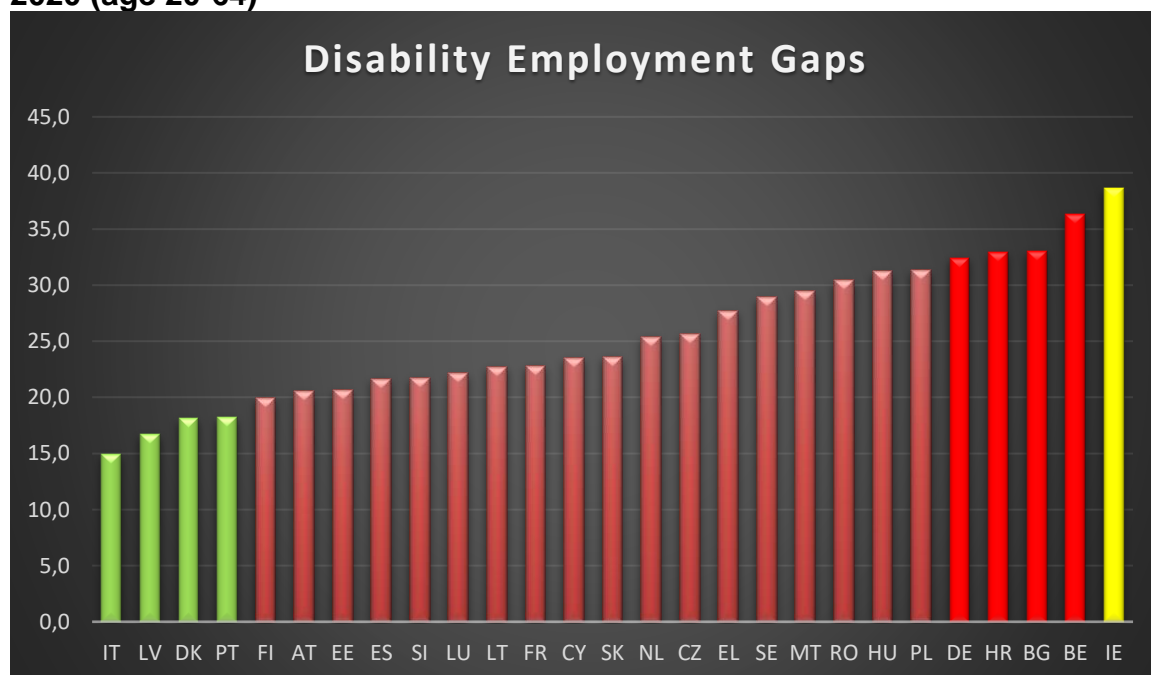
Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

The widest gender employment gaps between women with disabilities and men with disabilities were in Romania, Italy and Malta, but it is relevant to note that this gender gap is now very small (or even reversed) in some Member States. The indication is that the employment rate of women with disabilities has been rising faster than that of men with disabilities in most countries and might account for more of the narrowing in the overall disability employment gap in recent years. The ‘feminisation’ of contemporary labour markets is well known in general.⁷⁸ This is evident, for example, in the shift from (traditionally male) jobs in heavy industries towards (more traditionally female) service sector jobs, accompanied by trends towards (more traditionally female) patterns of flexible, part-time and precarious employment. There is some indication that employment participation of women with disabilities has increased even more rapidly than women’s employment overall, at least in some countries. This would merit further investigation. The pending availability of new data from the EU-LFS will make possible deeper analyses of the relationship between disability employment rates and job quality, and gender dynamics.

⁷⁸ Coyle, A. (2005). Changing times: flexibilization and the re-organization of work in feminized labour markets. *The Sociological Review*, 53(2_suppl), 73-88.

Figure 7: Disability employment rates in 2020 (age 20-64)

Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

Figure 8: Employment gaps between persons with and without disabilities in 2020 (age 20-64)

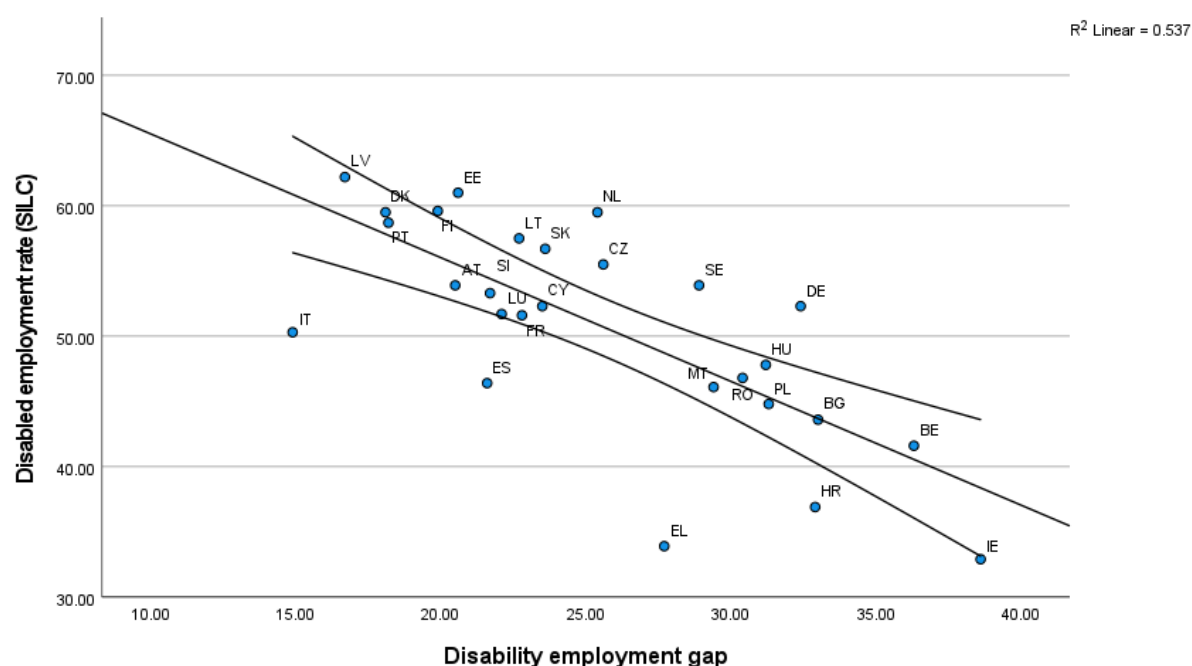
Source: Eurostat hlth_dlm200 (based on EU-SILC 2020)

Note: 'Best performers' from the Scorecard shown in green, with 'Critical situations' in red.

In general, countries that show a high disability employment rate in the EU-SILC data might be expected to show a small disability employment gap on the Scorecard, but there is not a direct relationship. The two measures shown above are based on different versions of the EU-SILC data but it is interesting to compare them for illustration. As expected, Figure 9 shows a moderately strong inverse relationship but with some outliers. For example, Latvia indicates a high disability employment rate

overall with a narrow disability employment gap. Ireland indicates a low disability employment rate and wide disability employment gap. By contrast, Greece indicates a very low disability employment rate but only a moderate disability employment gap (which might be due to generally low employment rates for other persons too). Spain and Italy also indicate smaller employment gaps than might be expected from the disability employment rates (although the rate is estimated for Italy). Conversely, the Netherlands, Sweden and Germany indicate somewhat wider disability employment gaps than might be expected from the rate (estimated for Germany). This raises some questions about the most appropriate measures to consider in comparisons.

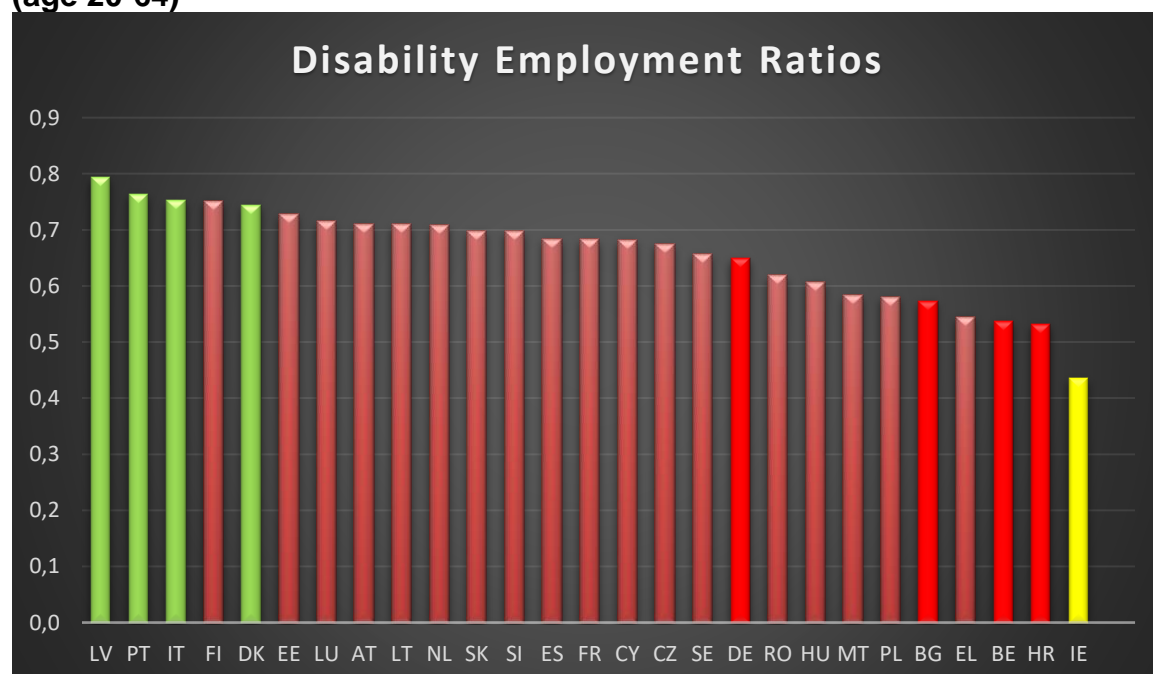
Figure 9: Scatter Plot of Disabled employment rate (SILC) by Disability employment gap



To contextualise the headlines statistics, it is relevant to consider both the disability employment rate and the disability employment gap in relation to general labour market conditions in each country (the general availability of jobs) and to the reported prevalence of disability in each country (the proportion of persons reporting activity limitation in the survey). An apparently low disability employment rate in a country with weak labour market opportunities might not be surprising and a narrower disability employment gap might be predicted if job opportunities are also suppressed for persons without disabilities (e.g. in the years following the economic crisis of 2008 low disability employment rates in Greece and Spain were somewhat obscured by low general rates of employment, especially among high youth unemployment). A wide disability employment gap in a country with generally weak employment opportunities merits further analysis and explanation. One way of controlling for context is to represent the chances of employment for persons with disabilities relative to persons without disabilities in each country, rather than the gap (i.e. using an odds ratio of the disability employment rate and the non-disabled employment rate). The employment rates used to estimate the disability employment rate in the Scorecard were not available, but this can be illustrated using employment rates estimated from the microdata.

The relative chances of being in employment for persons with disabilities, compared to other persons, ranged from approximately 0.8 in Latvia, Portugal, Italy and Finland, to approximately 0.5 in Belgium and Croatia, and just 0.43 in Ireland.⁷⁹ Using this measure does not have a large impact on the categorisation of 'Best performers' used in the Scorecard but it does alter the rankings, notably among those categorised as 'Critical situations', as illustrated in Figure 10. It is important to recall that missing data is estimated here for Germany but the relevant methodological consideration is that countries with high employment rates in general may indicate wider employment gaps on the Scorecard (measured in percentage points) than countries with lower employment rates but similar employment ratios. A wide employment gap is a significant concern, and provides national authorities with a focus to narrow it, but a low disability employment ratio might be a more reliable comparative indicator. This would merit investigation when disability data becomes available from the EU-LFS.

Figure 10: Relative employment chances for persons with disabilities in 2020 (age 20-64)



Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

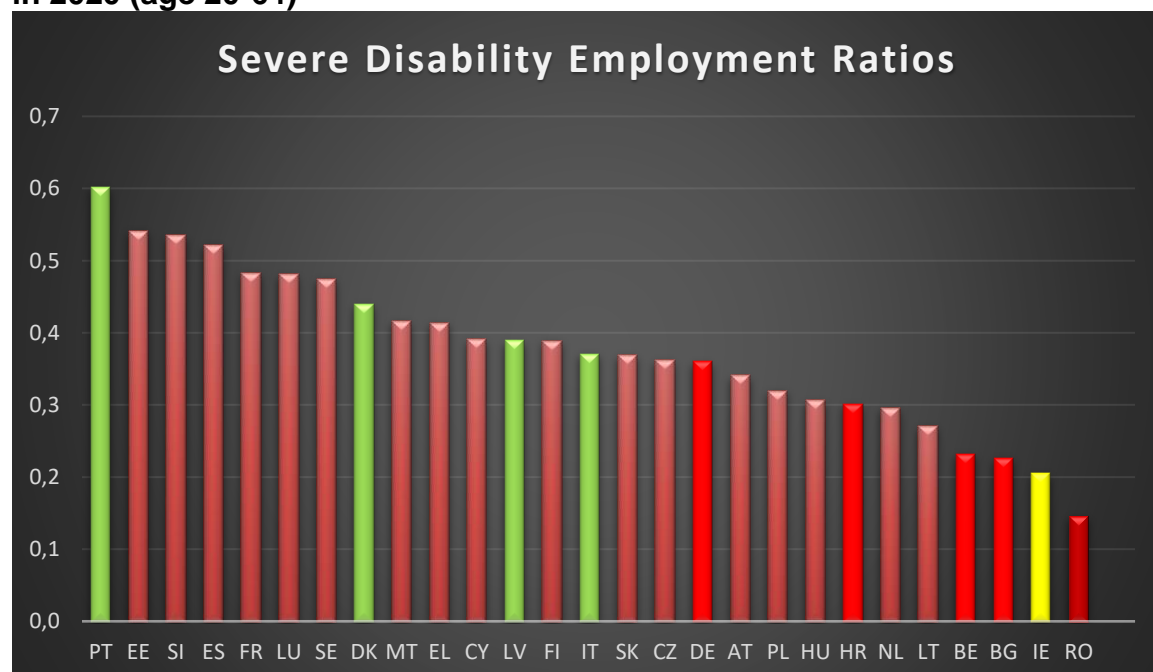
Note: 'Best performers' from the Scorecard shown in green, with 'Critical situations' in red.

The employment chances of people reporting more severe impairments ('strong' limitations in EU-SILC) are much lower, when compared to persons without disabilities, and the variation is wider between countries. In 2020, this varies from over 0.5 in Portugal, Estonia, Slovenia and Spain (0.6 in Portugal) to less than 0.3 in the Netherlands, Lithuania, Belgium, Bulgaria, Ireland and Romania (0.15 in Romania). This is shown in Figure 11 below. The sub-group of people with severe impairments is significant from a policy perspective because they are more likely to be impacted by disabling barriers to employment (e.g. inaccessibility or discriminatory attitudes) and by disability policies (e.g. the availability of disability benefits or target employment support). Looking at the employment ratio for people with severe impairments presents

⁷⁹ The outlier case of Ireland, where the odds of employment for persons with disabilities appear particularly low, was flagged in the previous year and is examined later.

very different indication of ranking for the 'Best performers' and 'Critical situations' on the Scorecard (based on employment gap and for all persons with disabilities). For this reason, a disaggregation of severity is always worthy of consideration in analysis.

Figure 11: Relative employment chances for persons with severe impairments in 2020 (age 20-64)



Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

Note: 'Best performers' from the Scorecard shown in green, with 'Critical situations' in red.

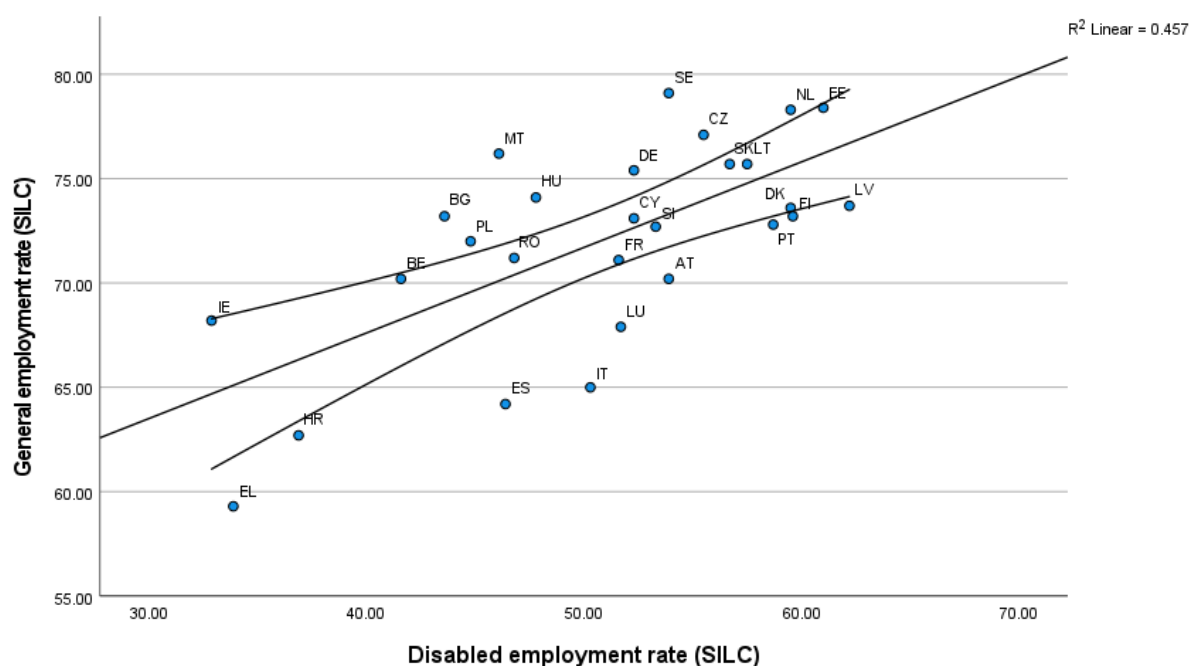
5.2.3 Controlling for variation in labour market conditions

Employment outcomes for persons with disabilities depend on various factors. These include personal factors, the availability of supportive policies, and general labour market conditions. As suggested earlier, any downturn in job opportunities or job security resulting from the COVID-19 crisis is likely to impact both workers and jobseekers with and without disabilities. Following the previous financial crisis persons with disabilities were not necessarily 'the first to be fired and the last to be hired' and there was modest evidence of some protective effect on their employment overall, albeit a marginal improvement relative to other persons. The extent of the disability impact might depend, for example, on the degree of segmentation in the labour market (e.g. job protection in sheltered or quota-based employment), the effectiveness of non-discrimination sanctions, the amount of targeted support for jobseekers with disabilities (disability employment services and subsidies), and the accessibility of the environment (including public transport and workplaces).

Such factors cannot be easily disaggregated from general labour market data and require country-level analysis of policy factors (which is provided in the EDE country fiches). Nevertheless, it is helpful to contextualise the employment chances of persons with disabilities in relation to general labour market conditions. This can be illustrated by plotting the disability employment rate in each country against the general employment rate (as shown in Figure 12), which confirms the strong positive association (i.e. countries with higher general employment rates tend to exhibit higher

disability employment rates). This should be expected and the overall linear correlation between the general employment rate and the disability employment rate is significant ($r = .676$; $p < .01$), although it weakened compared to 2019. In the absence of other explanations, variation in general labour market opportunities might explain about half of the variation in disability employment rates among the Member States ($R^2 = .457$).⁸⁰

Figure 12: General employment rate (SILC) by Disabled employment rate (SILC) in 2020



This general association had strengthened to some extent prior to the COVID-19 crisis, consistent with the observation of a slowly narrowing disability employment gap during the preceding recovery. As the disability gap narrowed so the association with general labour market conditions strengthened. This trend appears to have weakened already in 2020, with the onset of COVID-19 but considerable caution should be applied when interpreting the provisional microdata used for illustration here. Looking at the outliers, Sweden and Malta seem to have a lower disability employment rate than might be expected from their general employment rate, while the reverse was observed in Greece, Spain and Luxembourg (and Italy, but based on estimated data).

Caution is needed at the country level as disability employment outcomes vary widely and most of the cases lie outside the predicted confidence bands for the trend (95 %). Nevertheless, the data raises interesting policy questions. Outlier country cases may merit further analysis since their divergence might be explained by a combination of policy factors or methodological factors (in sampling, data definition or response factors). For example, a low disability employment rate in Greece was associated with a low general employment rate but a similar disability employment rate in Ireland was

⁸⁰ Since persons with disabilities are included in both the general employment rate and the disability rate it is worth noting the exclusive comparison between persons with and without disabilities ($r = .633$; $p < .01$; $R^2 = .401$). However, this tends to exaggerate the effect of differences in the prevalence of self-reported activity limitation between national surveys, which is addressed later.

associated with a stronger general employment rate. Cases higher above the trend line are associated with wider disability employment gaps (and weaker disability employment chances) than cases below the trend line.

To summarise, a choice of disability employment indicators is available and they should not be read in isolation. The introduction of a provisional 'disability employment gap' indicator in the Scoreboard is a major step forward in mainstreaming disability equality in the 2022 Semester.

The future availability of data from the EU-LFS will strengthen this considerably, in terms of statistical power and harmonization with the standard method of estimating employment outcomes in the Semester. However, it is worth considering the option to indicate a 'disability employment ratio' (relative employment chances) in analysis.

Any modelling of disability employment outcomes should take account of wider job opportunities because these affect all persons in the labour market, albeit to different degrees.

The disability employment rate will be affected by targeted disability employment policies (subsidies, quotas, incentives, accessibility) and by general labour market policies and economic conditions. If disability policies are successful, and persons with disabilities become more integrated into the open labour market, then aggregate disability employment trends will also follow more closely general employment trends.

The COVID-19 crisis, and policy responses to it, introduced significant economic shock and volatility in employment statistics since early 2020. These are only beginning to be visible in the 2020 SILC data but suggest a weakening of recent trends. This needs to be carefully monitored to ensure that disability equality gains during the period preceding the COVID-19 crisis are not lost.

5.2.4 Controlling for variation in disability prevalence rates

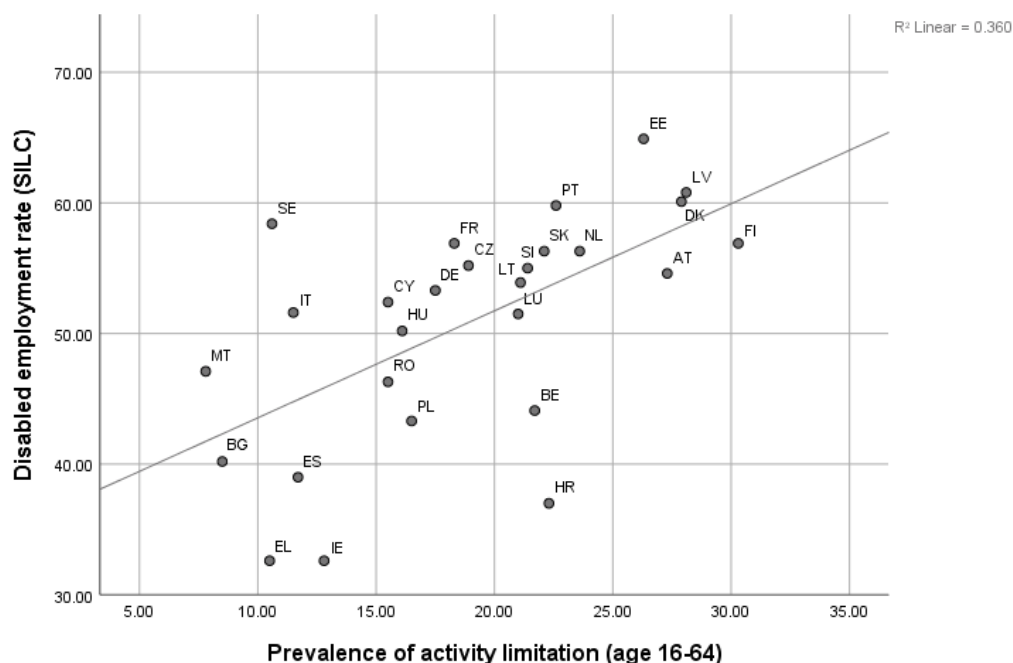
Caution is needed concerning methodological anomalies and variations in the prevalence of self-reported activity limitation and its association with employment outcomes (i.e. countries with higher disability prevalence rates among working age people do tend to average higher disability employment rates too but not in a consistent way). One common assumption is that high rates of self-reported activity limitation might over-represent persons with mild levels of impairment, with more positive participation outcomes (i.e. less disabled by societal barriers), and that low prevalence rates might over-represent people with more severe levels of impairment (and lower participation rates). In this case, countries with high prevalence rates might tend to indicate better than expected average outcomes for 'disabled' people and vice versa. This merits investigation to establish the possible effects.

The COVID-19 crisis introduced an additional uncertainty from 2020, both about self-reported health status and opportunities for employment. It would be advisable to re-examine this problem with the availability of disability employment statistics from the EU-LFS survey, which has a larger sample size than EU-SILC. The following analysis was conducted in 2021 to explain the contingencies involved in controlling for variation

in disability prevalence. The most recent prevalence data for 2020 were already reviewed in section 5.1.1.

Taking all the data points for the EU27 countries prior the COVID-19 crisis, from 2008-2019, where available (valid observations N=319), there was a statistically significant but only moderate positive correlation between the reported prevalence of activity limitation in the age group 16-64 and the disability employment rate per country overall ($r=.626$, $p<.01$). This association is shown for the most recent year (2019) in Figure 13. This illustrates the variation as well as the moderate association. For example, while Sweden, Portugal, Denmark, Latvia and Estonia appear to have high disability employment rates they have rather varying prevalence rates. Likewise, Sweden, Italy, Malta, Bulgaria, Spain Greece and Ireland report low prevalence rates but widely varying disability employment rates.

Figure 13: Disabled employment rate (SILC) by Prevalence of activity limitation (age 16-64) in 2019

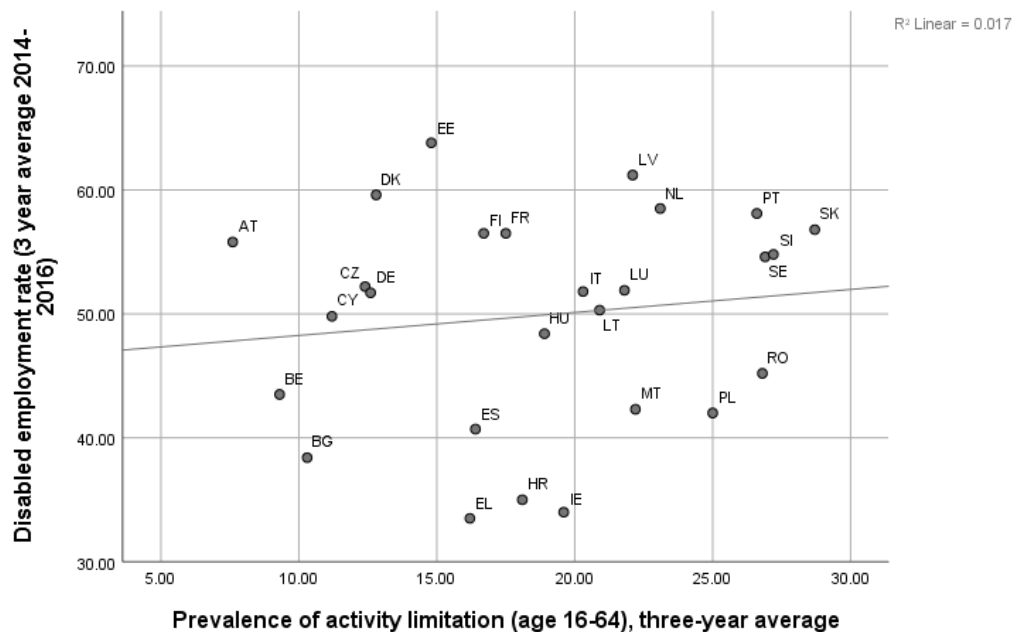


There were some large changes in the reported prevalence rates in some countries in some years, and breaks in the time series, for example due to changes in survey methodology (e.g. Germany since 2015, Italy since 2016). This results in some large standard errors across time within countries and within years between countries. There is less variation among the working age population than among older people, but it may be useful to consider an average (e.g. three years) or a trend when assessing prevalence as an artefact effect on outcomes. There is still wide variation between countries on this measure, with fewer than one in ten people aged 16-64 reporting disability in Latvia or Bulgaria on average and more than one in four in Slovenia, Estonia, Denmark, Austria, Finland and Latvia.

Using a three-year average to control for variation in self-reported prevalence weakened the correlation with 2019 employment outcomes slightly ($r=.600$, $p<.01$) and the positive association lost explanatory power ($R^2=0.0180$). The effect was similar

when plotting the three-year average prevalence against a three-year average employment rate (Figure 14, $r=.662$, $p<.01$, $R^2=0.017$). Using this control, the countries with the lowest disability employment rates (Ireland, Greece, Croatia and Spain) were not those with the lowest prevalence rates but rather closer to the average.

Figure 14: Disabled employment rate by Prevalence of activity limitation (age 16-64), using three-year averages (2017-2019)

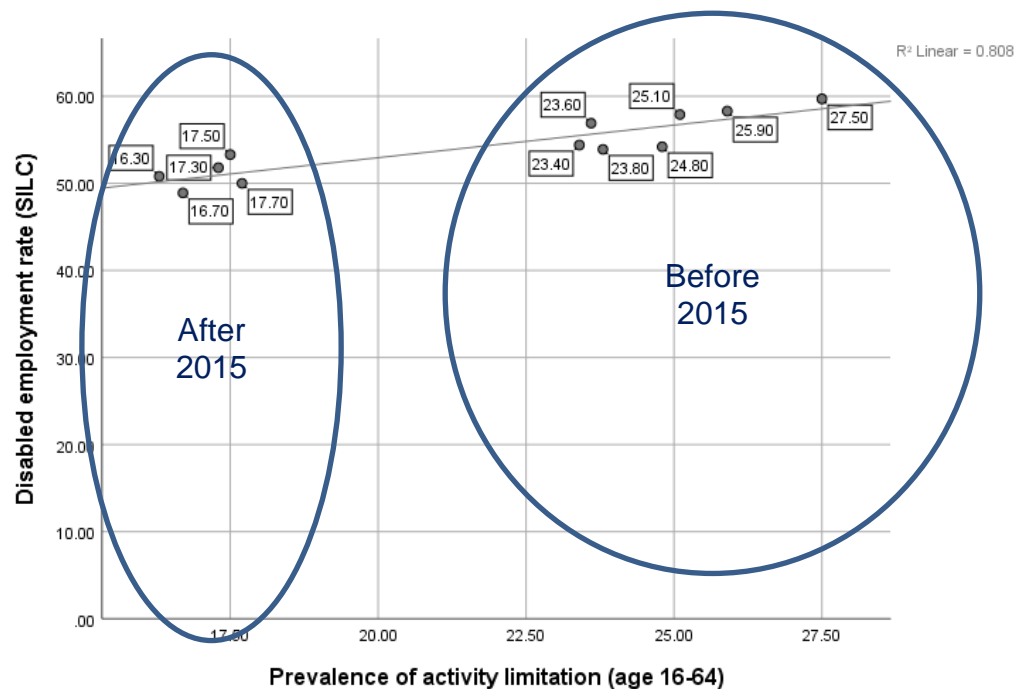


In summary, there is greater variation in prevalence rates than in the estimation of employment rates, which are both based on self-reporting in EU-SILC. Prevalence estimates may play a part in some cases as an artefact of the survey methodology, but other factors are needed to explain the patterning of employment outcomes.

Taking Portugal as a country example, there was only a weak positive association between variation in national prevalence estimates and national disability employment rate over the period 2008-2019 ($R^2=0.32$, for 12 data points) despite a wide range in employment rate, which improved over time, independently. The sample is limited by the small number of observations but illustrates the weak association between prevalence and outcome within most countries where there are no time-series breaks.

By contrast, a 2015 methodological change in Germany significantly reduced its prevalence estimates (restricting the definition towards persons with more severe impairments) and this change was strongly associated with worse disability employment outcomes on average (two distinct clusters of annual observations, before and after this break, are evident in Figure 15). Employment data for Germany was not yet available in the EU-SILC 2020 data provided for analysis here.

Figure 15: Disability employment rate by Prevalence of activity limitation (age 16-64) in Germany (2008-2019)



When considering EU survey estimates it is also useful to triangulate these against national data sources, where they exist. For example, the National Disability Authority in Ireland used 2016 Census data to observe an overall disability prevalence of 13.5 % in the general population,⁸¹ which is smaller than the SILC estimate of 16.4 % for persons aged 16 and over in 2019. The Census question was based on self-reporting against different categories of impairment or difficulty rather than the global activity item used in SILC.⁸² This national data produced a disability employment rate of 36 % in 2016, compared to a SILC estimate of 32.6 % among those aged 20-64 in 2019 (or a three-year average of 34 %). In this example, a lower prevalence in national data resulted in a more optimistic employment rate, although the differences were not great and the general employment rate had also increased between the two time points.

A popular hypothesis to explain the prevalence effect, outlined earlier, is that estimated disability employment rates might be inflated optimistically in countries that over-report persons with low levels of functional impairment in the disability category (because such persons might be closer to the labour market and more likely to be in employment). A more expansive disability definition may dilute negative outcomes, based on averages, while a restrictive definition may intensify them. This is clearly shown by comparing the employment rates of persons with moderate impairments and those with severe impairments in the EU-SILC data (see Figure 6). However, such effects do not easily explain country variations on equivalent measures, except in specific cases. The German example illustrates this with a known definitional change

⁸¹ National Disability Authority (2018) *NDA Factsheet 1: Disability Statistics*, <http://nda.ie/resources/factsheets/nda-factsheet-1-disability-statistics-briefing-information1.docx>.

⁸² Central Statistics Office (2018) *Census of Population 2016 – Profile 9 Health, Disability and Carers: Types of Disability*, <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9tod/>.

in the disability category, but it would be misleading to imply that all cases of low reported prevalence result from restrictive disability definitions in survey design (the artefact effect might also be cultural/linguistic or random).

To control for this effect a linear regression was run to predict disability employment rate from the general employment rate and from the working age disability prevalence rate, but without consideration of national policy factors (see Table 18). Taken together, these two variables did predict the pattern of reported employment outcomes in a strong and statistically significant way overall. $F(2, 24) = 22.855$, $p = <.01$, $R^2 = .722$ (adjusted to .698). Indeed, these two contextual variables might appear to explain around two thirds of the total variation in estimated disability employment rates among the EU27 Member States in 2019. Both variables added significantly to the prediction when the other was controlled but around a third of the variation in disability employment rates still could not be accounted for by these factors.

On average, in 2019, a one percentage point increase in the general employment rate predicted an increase of 1.17 percentage points in the disability employment rate per country (when variation in the rate of prevalence was controlled), suggesting a small disability employment bonus consistent with a narrowing disability employment gap. The effect of the prevalence rate was rather less, at 0.64 points on average, consistent with the weak positive association outlined earlier.⁸³

Table 18: Predicting disability employment from general employment and prevalence rates in 2019

Coefficients: Dependent Variable: Disabled employment rate (SILC)						
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	-45.589	14.785		-3.083	.005
	General employment rate (SILC)	1.172	.210	.616	4.216	.000
	Prevalence (age 16-64)	.636	.151	.465	4.216	.000
a. Dependent Variable: Disabled employment rate (SILC)						

The range of confidence in these predictions at the country level remains very wide, which underlines that, general predictions do not hold true for specific countries. This does not devalue the relevance of an EU level headline indicator but, for policy analysis at the national level, a more focused approach is needed in country reports.

In summary, it is important to be aware of a weak positive association between estimates of prevalence and estimates of employment outcomes, based on self-reporting in EU-SILC. It is also relevant to be aware of significant time series breaks within countries. Prevalence should be factored into modelling outcomes as it varies between countries and years. The effect is less than the effect of general labour market conditions, and can be largely controlled by taking a multi-year average, but anomalies should be highlighted. Differences in disability outcomes should not be discounted

⁸³ If a similar regression is run for all countries and data points since 2008 the contributions of general employment rate and prevalence are more evenly matched but similarly significant ($F(2, 159) = 24.902$, $p = <.01$, $R^2 = .712$ (adjusted to .709), with a contribution of .894 and .819 respectively.

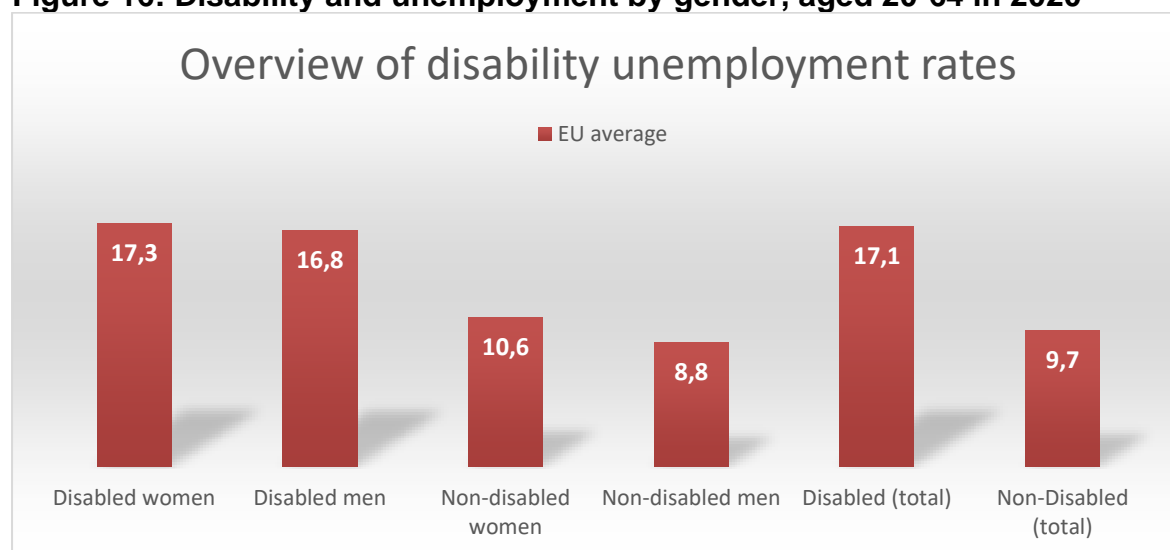
solely on this basis and should be investigated further. From 2022-2023, the disaggregation of disability data from the EU-LFS should allow for increasingly robust statistical estimates and breakdowns to be obtained, due to larger sample sizes.

5.2.5 Unemployment

Disability unemployment rates are relevant not only for the Semester but as a disaggregated measure supporting implementation of the Sustainable Development Goals. The challenges in comparing disability employment rates are compounded for unemployment rates, for two reasons – the numbers of persons with disabilities in the unemployment category are much smaller and national administrative rules and definitions of ‘unemployment’ vary in relation to disability (e.g. whether people in vocational ‘rehabilitation’ programmes are counted as job seekers, trainees or employees). In some countries only ‘registered’ disabled persons are counted by the employment service, while the EU-SILC is self-reported. The SILC and LFS methodologies also differ⁸⁴ and the analysis will be greatly assisted when the disability is discernible from the EU-LFS core statistics.

Women and men with disabilities report much higher levels of unemployment across the EU, compared to other persons, as shown in Figure 16. The pattern across age groups mirrors the employment rate trend with inequalities at all ages but a widening disability equality gap among older workers, as shown in Figure 17.⁸⁵

Figure 16: Disability and unemployment by gender, aged 20-64 in 2020



Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

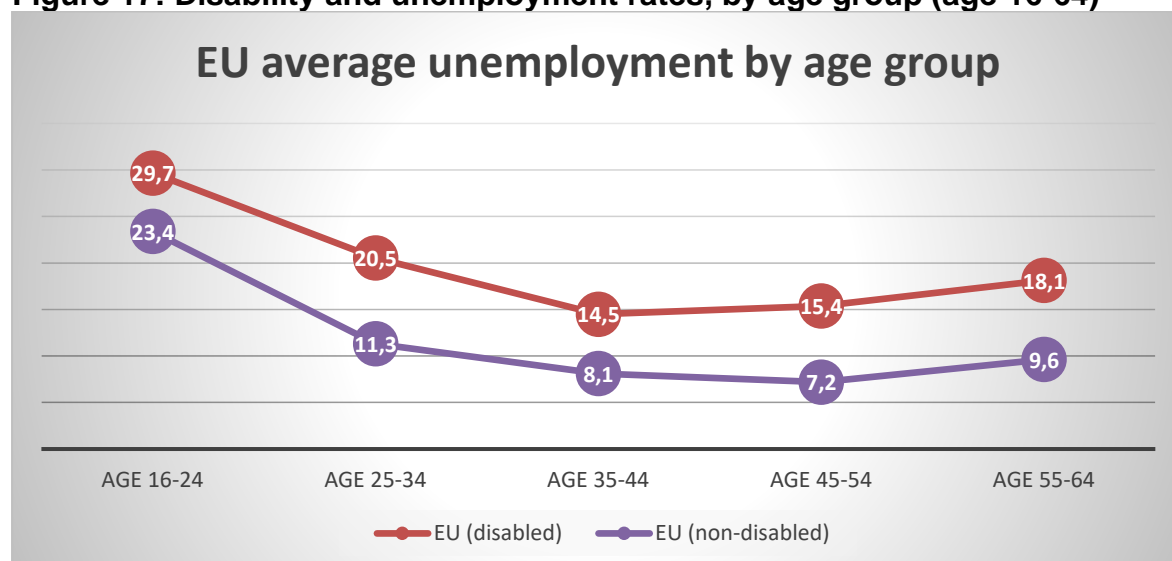
The early impact of the COVID-19 crisis was already evident in the provisional data from EU-SILC for 2020, with evident increases in unemployment for both disabled persons and other persons. This was particularly notable in relation to estimates of youth unemployment, with the EU27 average rising to nearly 30% among the disabled sample aged 16-24 (but based on estimations for missing data from Germany and

⁸⁴ EU SILC relies on self-declared current ‘main activity status’, and produces higher estimates of unemployment, but trends from the two surveys run systematically in parallel.

⁸⁵ At the national level, there are limitations of small sample size in the younger age groups for some countries.

Italy). Across the life course, the average risk of unemployment came close to, or exceeded, twice the risk for other persons in 2020.

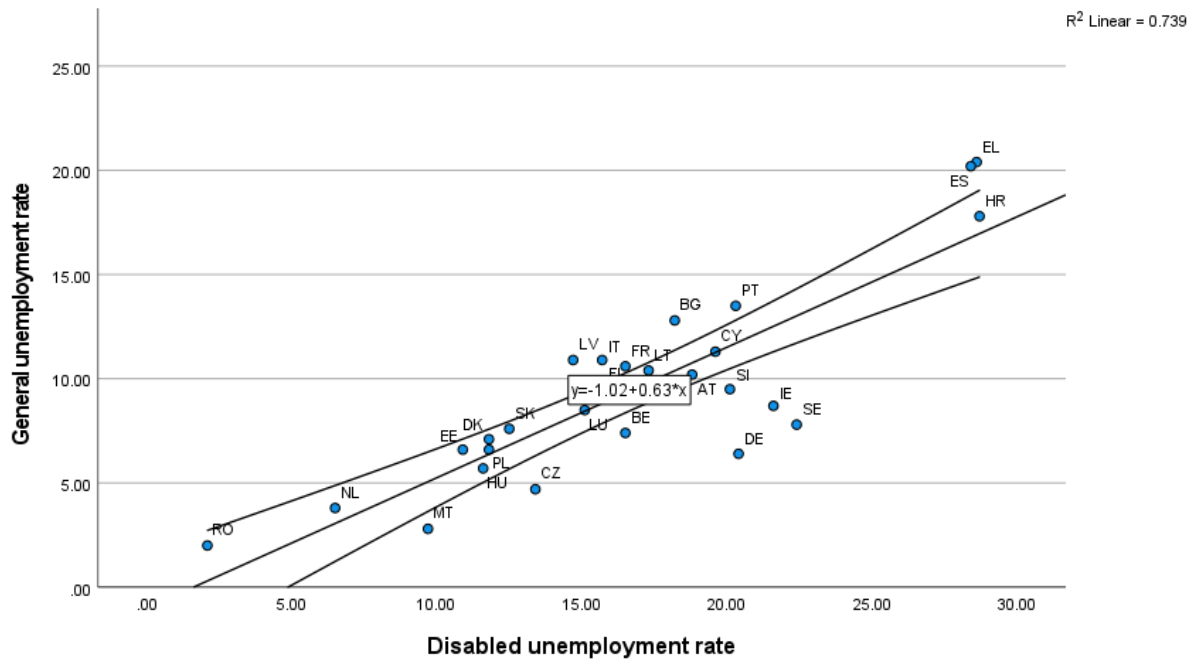
Figure 17: Disability and unemployment rates, by age group (age 16-64)



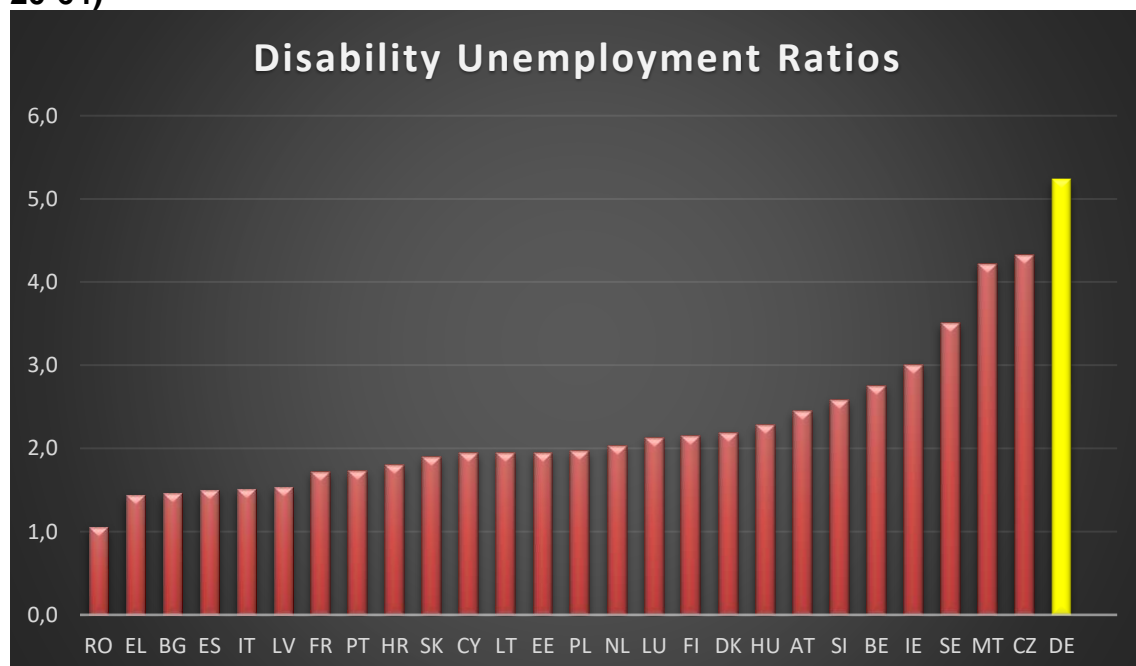
Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

Repeating the same type of indicative analysis provided for employment data, there is a strong positive association between the general unemployment rate and the rate for persons who declare activity limitations, which is also highly statistically significant ($r=0.860$; $p<.01$). Persons with disabilities are much more likely to be unemployed in countries that have generally high unemployment, and to a greater degree. The association between disability and general unemployment rates is stronger than the association between disability and general employment rates. There is no significant association between reported prevalence and unemployment rates so an analysis of country-level factors, including policy approaches, might be even more important in explaining divergent outcomes.

The clustering of countries around the average unemployment trend is closer than for employment rates. For example, the very high rates of general unemployment in Greece, Croatia and Spain are reflected in correspondingly high rates for persons with disabilities (but still around ten percentage points higher). Conversely, countries with low levels of general unemployment tend to report low levels of unemployment for persons with disabilities too. Some countries report disability rates above the trend expectation, and some below. The reported rate of disability unemployment in Romania has remained notably low (as it is generally), while higher than expected rates are observed in Ireland, Germany and Sweden (estimated for Germany). Such cases merit further analysis (for example, examining the policy relationship between disability and unemployment status).

Figure 18: General unemployment rates and disability unemployment rates

To standardise an indication of the relative chances of persons with disabilities being unemployed compared to other persons in each country an odds ratio is again helpful. In 2019, this revealed an anomaly in the case of Germany, where the odds of unemployment for persons with disabilities were 5.7 higher (5.2 estimated in 2020). This is shown in Figure 19 but, as with the case of employment, it is important to consider the possible effect of self-reported prevalence (which requires further analysis).

Figure 19: Relative unemployment chances for disabled persons in 2019 (age 20-64)

Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

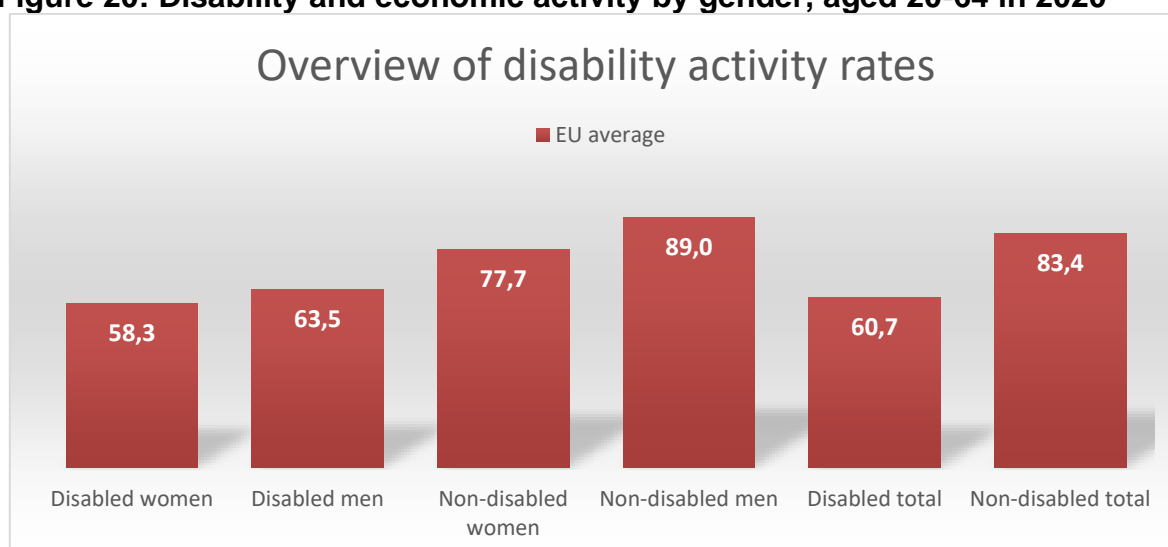
In summary, in a fully inclusive and non-discriminatory labour market, with provision of appropriate employment support, rates of unemployment among persons with and without disabilities should be similar (assuming all who enter the labour market are capable of work). Clearly this is not the case. Unemployment rates are higher for persons with disabilities than for other persons in every EU Member State and the impact of the COVID-19 crisis may exacerbate this. A range of supply and demand side explanations are possible, which may work in combination in different national contexts, for example the extent to which:

- Employers discriminate against persons with disabilities when hiring from the general pool of job seekers.
- Job seekers with disabilities lack some of the skills or qualifications needed for the job opportunities available in the labour market.
- Insufficient accessibility or support is available to help suitably qualified job seekers with disabilities into work, or to sustain them in work.
- Employment policies are directing more persons with disabilities into the labour market than have realistic chances of finding a job.

5.2.6 Economic activity

Across the EU and in every Member State (gendered) activity rates of working age persons with disabilities fall well below those for other persons in the population. There have been increases in economic activity, which may reflect improving labour market conditions and/or policy advances but the key policy question is whether access to the labour market results in employment chances (rather than adding to unemployment). It is relevant to note that early indications suggest that activity may have continued to increase for persons with disabilities in 2020 while they began to fall for other persons (but caution is required as the data available for analysis was not complete for all countries). Figure 20 presents an overview of activity for women and men at the EU level, estimated for 2020.

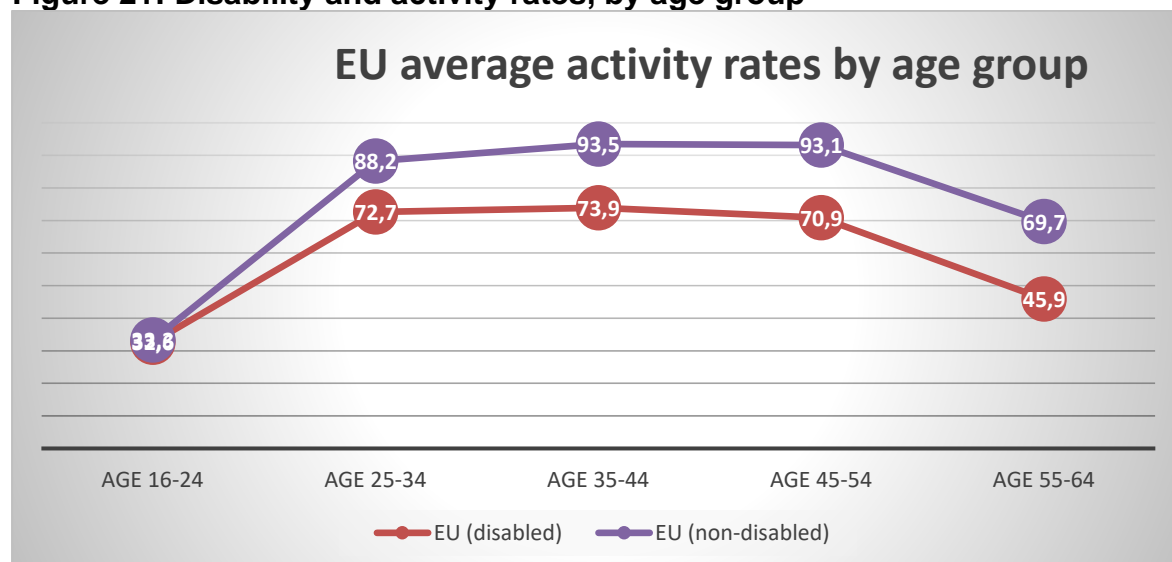
Figure 20: Disability and economic activity by gender, aged 20-64 in 2020



Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

A familiar pattern is evident across the working age life course, with accentuation of exclusion among older workers (see Figure 20). This reinforces the tendency, discussed earlier, for early exit among workers who acquire impairment later in their working careers (via disability or early retirement schemes). The extent of this gap varies between countries, as shown in the EDE country fiches.⁸⁶

Figure 21: Disability and activity rates, by age group

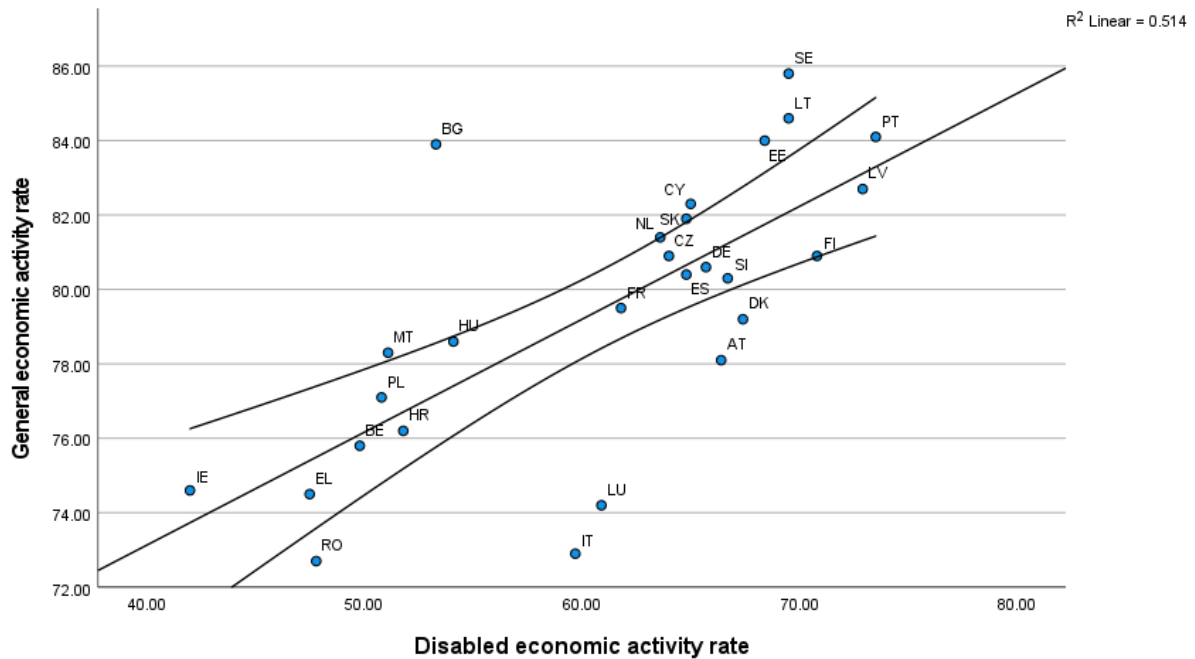


Source: EU-SILC UDB 2017 – version of April 2019.

A comparative analysis of economic activity data helps to complete the picture of variation in labour market outcomes for persons with disabilities. We should expect the activity rate of persons with disabilities to vary in proportion to the economic activity rate of the general population but at a lower rate, reflecting a proportion of persons who may be unable to work, temporarily or permanently. As Figure 22 shows, there is a positive association, and it is statistically significant ($r=0.717$; $p<.01$). Little of the variation in disability activity rates between EU Member States can be explained by differences in general activity rates for those countries. This means that other factors must be involved (e.g. policy factors).

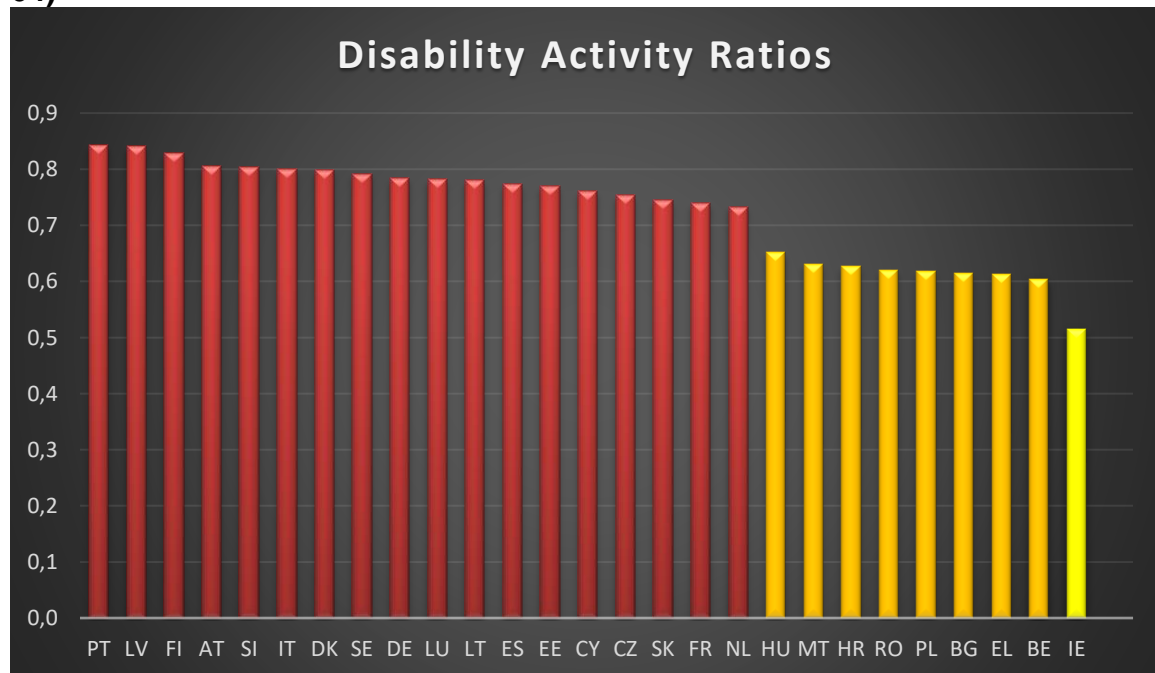
The data for Ireland continues to indicate very low disability activity rates, which might account for the correspondingly low disability employment rate (but this reflects a low general economic activity rate too). The disability activity gap was much wider in Bulgaria than would be predicted from the EU trend (with high general activity and low disability activity). On the other hand, the cases below the trend line in Figure 22 suggest higher rates of activity among persons with disabilities than might be predicted from low average activity rates. For example, this was indicated for Italy, Luxembourg, Austria and Denmark (although based on estimated data for Italy).

⁸⁶ Data for the youngest age group may be limited for some countries due to smaller sample sizes.

Figure 22: Disabled economic activity rate by General economic activity rate

Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

Again, an odds ratio may help to indicate the relative chances of persons with disabilities being economically active compared to other persons. This is shown in Figure 23, while noting the above anomalies.

Figure 23: Relative activity chances for persons with disabilities in 2020 (age 20-64)

Source: EU-SILC UDB 2020 – accessed April 2022 (estimated for Germany and Italy).

There is some positive association between self-reported prevalence and the disability activity rate but it is not strong ($r=0.566$; $p<.05$). In countries where more people self-

report in the disability category the activity rate for this group tends also to be higher (according to the hypothesis outlined earlier, this might suggest that the survey captures more persons with low levels of impairment in these countries who are, on average, also closer to the labour market). This observation requires some control and, as with employment outcomes, it is helpful to look also at activity rates for persons declaring a more severe (strong) level of impairment, for example. This analysis (shown in previous ANED reports) confirms the lack of any clear association between economic activity rates for the general population and those for more people with severe impairments. The interactions between disability, employment, unemployment and economic activity will be open to more detailed analysis when the disability variable becomes available in the EU-LFS core dataset, and this should be explored in future years.

In summary, there is wide variation in economic activity. Among countries with generally high levels of economic activity there are several with apparently low rates for persons with disabilities. General rates of economic activity do not explain the variation in economic activity for people with severe impairments and this requires national level explanation, including explanations of policy approach.

The policy mixes that funnel those who are not in employment towards either unemployment or inactivity categories include both employment policies and social protection policies (e.g. the availability of disability pension schemes and the gateway eligibility conditions attached to them).

Disability employment rates, gaps and ratios are necessary but not sufficient to explain the labour market participation of persons with disabilities. Unemployment is relatively small but important category for those seeking employment, and often requiring targeted support, but economic activity is particularly important as a large and widely divergent factor among EU Member States.

5.2.7 Comparing indicators of employment, unemployment and activity

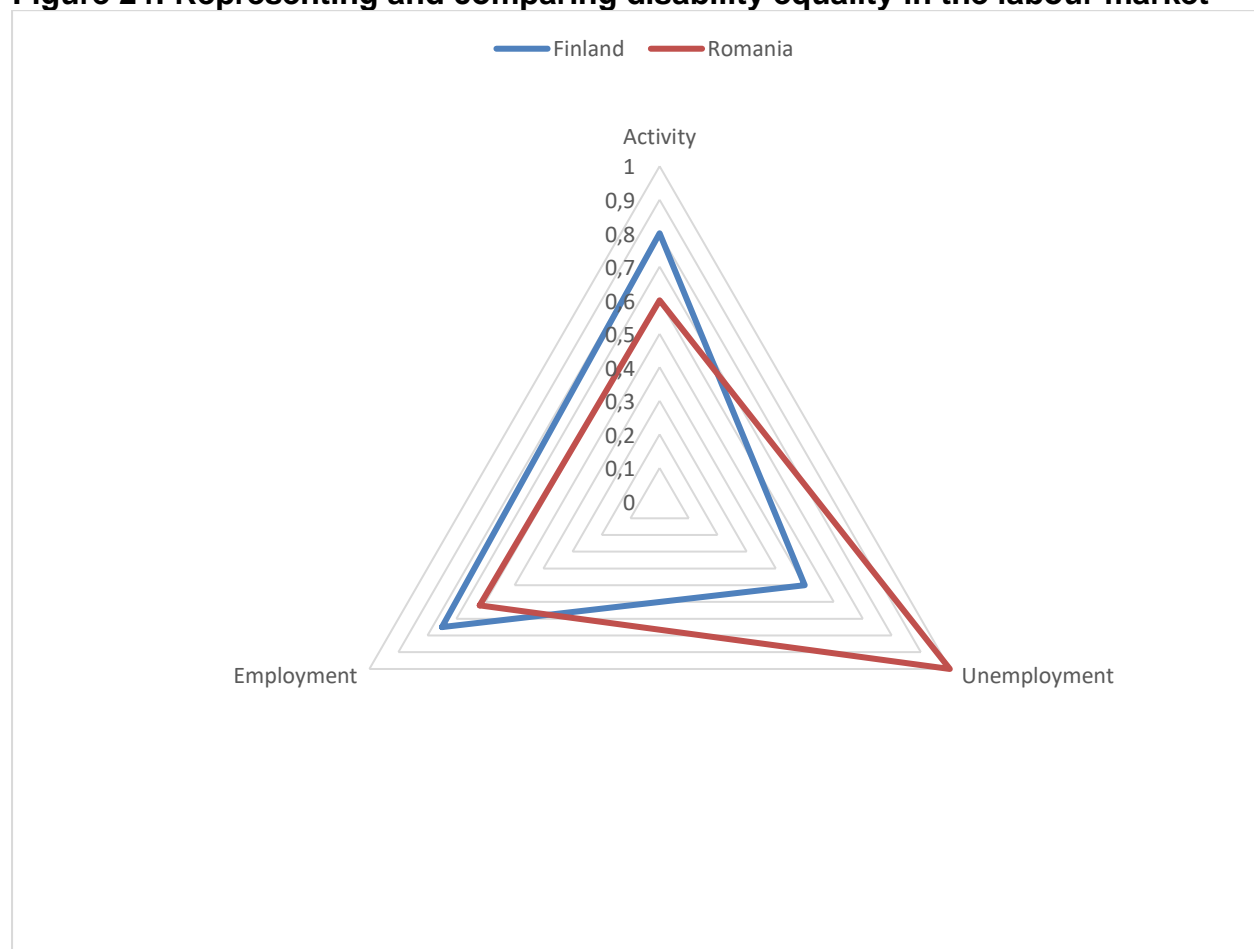
The previous analyses of headline indicators suggest a complex and often unpredictable interaction between key labour market indicators for persons with disabilities in EU Member States. A high general employment level does not always predict a high disability employment level at the country level, although there is an average trend to this effect across the EU. The same is true for unemployment rates and activity rates, but not in equal measure or even in equal direction – a low disability employment rate might be associated with a high unemployment or a high activity rate (depending, for example, in which direction non-working persons with disabilities are funnelled by national policy options or definitions).



By disaggregating these three factors and equivalising them as odds ratios we can represent the relative extent of the disability equality challenges within and between countries. For example, the 2020 data indicate a parity of unemployment chances for persons with disabilities in Romania (with marginally less chance of being unemployed than other people) but a significant challenge in economic activity (where their odds of being active are only around 0.6 of other persons), and for employment. For comparison, Finland faced fewer inequalities in activity and employment but greater challenges in unemployment. This example comparison is represented in Figure 24.

This compares the relative chances of being economically active, employed and not being unemployed in each country (the unemployment ratio is inverted to express all three as a positive chance). An odds ratio of 1.0 would mean that persons with disabilities' chances were equal to those of other persons, on average.⁸⁷

Figure 24: Representing and comparing disability equality in the labour market

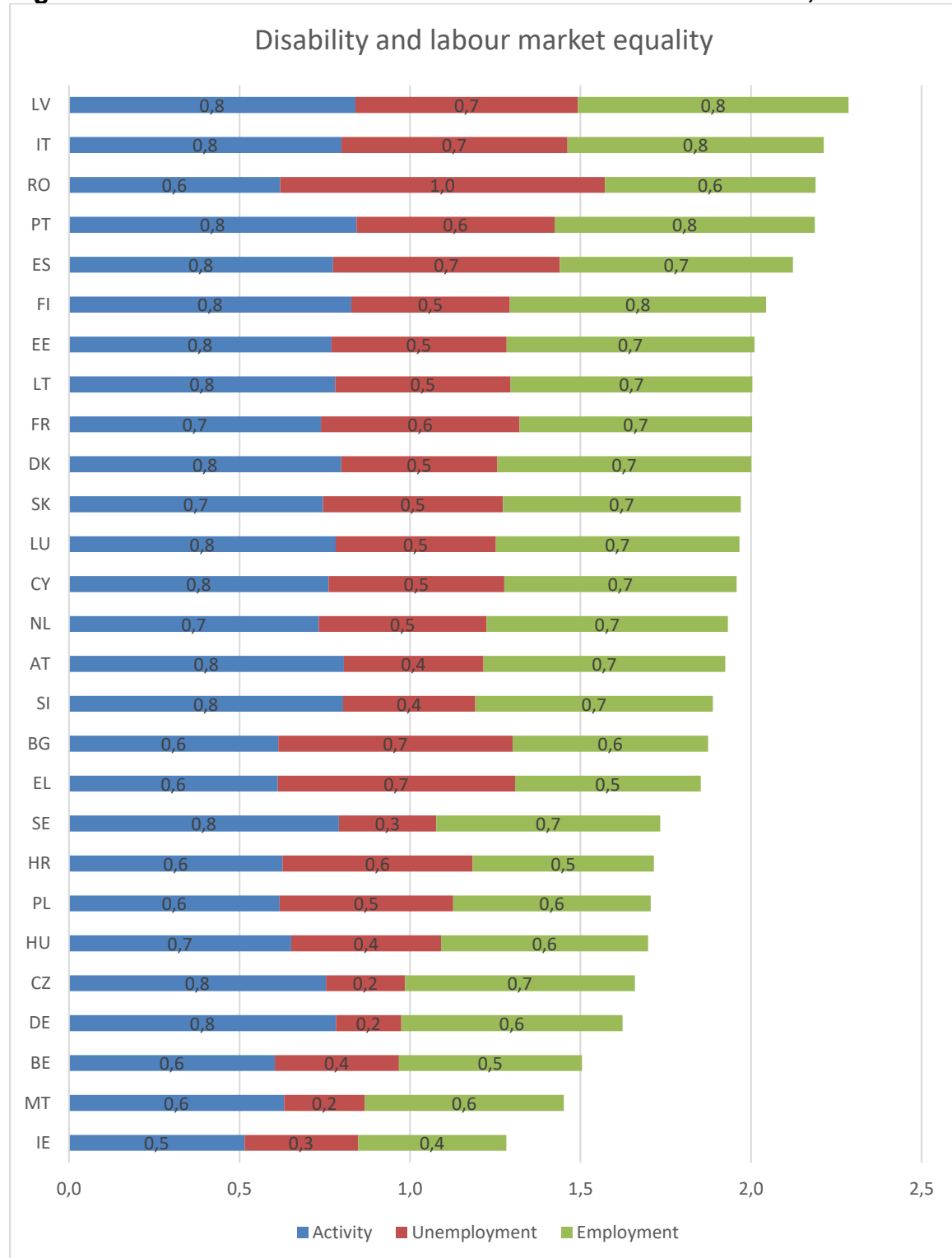


The following summary table provides an overview of the three different indicators in 2020, expressed as odds ratios for all countries. By stacking these ratios the combined total suggests a broad synthetic indicator of labour market inclusion, although this

⁸⁷ For the purpose of policy analysis, shorter component bars might suggest areas of policy concern for further analysis at country level. A score of 1.0 in each component approaches parity with other persons.

would need to be contextualised with an examination of methodological artefacts (such as the prevalence factor).

Figure 25: Stacked odds ratios of inclusion in the labour market, in 2020



It is important to recall that a minority of persons with disabilities cannot be expected to enter the labour market (i.e. it would not be realistic to expect an activity or employment ratio of 1.). However, with appropriate assessment of work potential and accessible jobs then persons with disabilities' chances of being 'not unemployed' in the labour market should not be markedly worse (less than 1.0) compared to other persons.

5.3 Disability and poverty reduction

Several of the insights arising from analysis of the labour market situation are relevant also to indicators on poverty and social exclusion. These indicators are more reliably established as they follow the same EU-SILC methodology as the Semester, and because the summary tables are already published in the disability and income distribution section of Eurostat's health database.⁸⁸ This affords an opportunity to examine some breakdowns beyond the headline indicators and also to consider the additional dimension of access to healthcare, which was highlighted as a concern during the COVID crisis, along with long-term social care.

5.3.1 Strategic context

Article 28 CRPD refers to 'social protection programmes and poverty reduction programmes' as well as 'assistance from the State with disability-related expenses' and 'retirement benefits and programmes', access to 'affordable services, devices and other assistance for disability-related needs' and to 'public housing programmes', while Article 19 refers to 'in-home, residential and other community support services, including personal assistance' schemes.⁸⁹

In its concluding observations to the EU, in September 2015, the UN Committee noted 'with deep concern the disproportionately adverse and retrogressive effect the austerity measures in the EU have on the adequate standard of living of persons with disabilities'. It recommended that the EU should:

...take urgent measures, in cooperation with its Member States and representative organisations of persons with disabilities, to prevent further adverse and retrogressive effect of austerity measures on the adequate standard of living of persons with disabilities, including by the provision of a minimum social protection floor.⁹⁰

In 2017, the UN Committee recommended Slovenia to 'Restore all support measures curtailed under the austerity policy and prevent any hardship that may be faced by persons with disabilities whose income was reduced as a result of that policy'.⁹¹ In its 2017 Recommendation to Cyprus the UN Committee also picked up the concept of a 'social protection floor that is not affected by expenses for disability-related costs and assistive devices and user payments for social services and support'.⁹² This is highly relevant to the Social Pillar principles, from a disability perspective. In its 2018 recommendations to Bulgaria the Committee sought to 'incorporate the human rights

⁸⁸ Eurostat (2021) Health database, <https://ec.europa.eu/eurostat/web/health/data/database>.

⁸⁹ See: <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx#28>.

⁹⁰ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fEU%2fCO%2f1.

⁹¹ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fSVN%2fCO%2f1&Lang=en.

⁹² See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fCYP%2fCO%2f1&Lang=en.

model of disability in the assessment process',⁹³ a topic also explored at length by ANED.⁹⁴ Addressing Poland, the Committee looked for disability mainstreaming in 'the national strategy for reducing poverty with concrete measures and relevant budget' (similar recommendation was given to Estonia in 2021).⁹⁵ It also recommended Poland to 'Ensure that the employment of persons with disabilities does not make them ineligible for disability-related protection schemes, such as disability allowances'.⁹⁶ In the UN's 2015 examination of Croatia concern was expressed about the number of people living in poverty (notably among Roma and rural communities) but also about 'the use of a restrictive financial assets test, which has downgraded the disability benefit'. The Committee recommended that 'poverty reduction programmes be strengthened' in this respect.⁹⁷

Within the sphere of social policies, Article 19 CRPD is particularly relevant to the Semester concerns with long-term care. Guidance and interpretation is provided in the UN Committee's *General Comment No. 5 on independent living and being included in the community*, adopted in October 2017.⁹⁸ Most social care concerns support for persons with disabilities, whether or not they are administratively identified as such, including the increasing number of older persons with care needs. These populations were significantly affected during the COVID-19 crisis, with those in residential care at higher risk of death and those supported in the community at higher risk of isolation and exclusion.

Article 25 CRPD addresses rights to health, including rights to 'the same range, quality and standard of free or affordable health care and programmes as provided to other persons' as well as 'health services needed by persons with disabilities specifically because of their disabilities'. Statistics on unmet need for medical care were introduced to the EDE country fiches and may provide an important indicator of any differential impacts for persons with disabilities evolving from the crisis.

These policy reference points are important for the Semester reviews. Social policies are, mostly, within the competence of the Member States and the EU disability strategy clearly acknowledges that persons with disabilities and their families are at higher risk of financial poverty, due to weaknesses in the labour market and social protection (including disability benefit rules). A new study and guidance on social protection was planned for 2022 and the Commission called on Member States 'to further tackle gaps

⁹³ See: https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fbGR%2fCO%2f1&Lang=en.

⁹⁴ Waddington, L., & Priestley, M. (2021). A human rights approach to disability assessment. *Journal of International and Comparative Social Policy*, 37(1), 1-15. doi:10.1017/ics.2020.21.

⁹⁵ See: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fEST%2fCO%2f1&Lang=en.

⁹⁶ See: https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fPOL%2fCO%2f1&Lang=en.

⁹⁷ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fHRV%2fCO%2f1.

⁹⁸ See: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/5&Lang=en.

in social protection for persons with disabilities to reduce inequalities, including by compensating extra costs related to disability and eligibility for disability benefits' (p. 13). The strategy also underlined the need for equal access to healthcare without discrimination.

5.3.2 Disability, poverty and social exclusion

Data on the social situation of persons with disabilities is presented in the EDE statistical review accompanying this synthesis report (using the most recent EU-SILC microdata from 2020) and following the Eurostat methodology. In this case it is not necessary to make comparisons with the EU-LFS, although that survey may present interesting data from a large sample when the disability variable becomes available for analysis by 2023 (although the EDE statistical report includes an estimation of disability pay gaps in 2019).

This EU-SILC data provides indicators of the key risks for persons with disabilities, including household risks of low work intensity, low income (after social transfers), and material deprivation. These three measures are combined in the overall estimate for risk of poverty or social exclusion (AROPE).⁹⁹ Relevant data from national sources is provided in each of the EDE country fiches, where available. These are divided by main age groups (for all persons aged 16 and over, 16-64, and 65+). The EU-SILC survey does not distinguish 'activity limitation' for children under the age of 16 so it has not been possible to disaggregate disability estimates of child poverty from this survey.¹⁰⁰ A 2017 ad hoc module included items on children's health and this survey estimated prevalence of around 4 % children with disabilities (3.2 % moderate, 0.8 % severe) among private households with dependent children (the survey does not include congregative/institutional households). The sample data for several Member States was not sufficient to report poverty outcomes reliably.

Table 19 summarises the aggregate data on poverty or social exclusion risks from which the EDE statistical indicators. These are shown in the EDE country fiches with comparisons of national averages and the EU27 average. These confirm that, on average and across the EU, persons with disabilities experience relative disadvantage on all three main measures. This is the case in every Member State to varying degree. It is worth noting that indicators of the main poverty risks increased between 2019 and 2020.

There is a clear association with severity of reported impairment and with gender equality (shown in Table 20). Persons reporting more severe levels of impairment face higher risks of poverty or exclusion, as do women when compared to men. Importantly, there are large differences in the average risks for adults of working age and for older adults (aged 65+). These are shown in Table 21. The elevated risks for adults of working age are mainly linked to the importance of employment income. Employment and the adequacy of working age disability benefits remain key factors when predicting poverty risk for persons with disabilities in the EU (as reported in the past by ANED).¹⁰¹

⁹⁹ The risks for older people do not include work intensity (Eurostat refers to the age group 0-59 for this measure).

¹⁰⁰ See: https://ec.europa.eu/eurostat/web/income-and-living-conditions/data/database?node_code=ilc_hch.

¹⁰¹ See: <http://www.disability-europe.net/theme/social-protection>; <http://www.disability-europe.net/theme/statistical-indicators>.

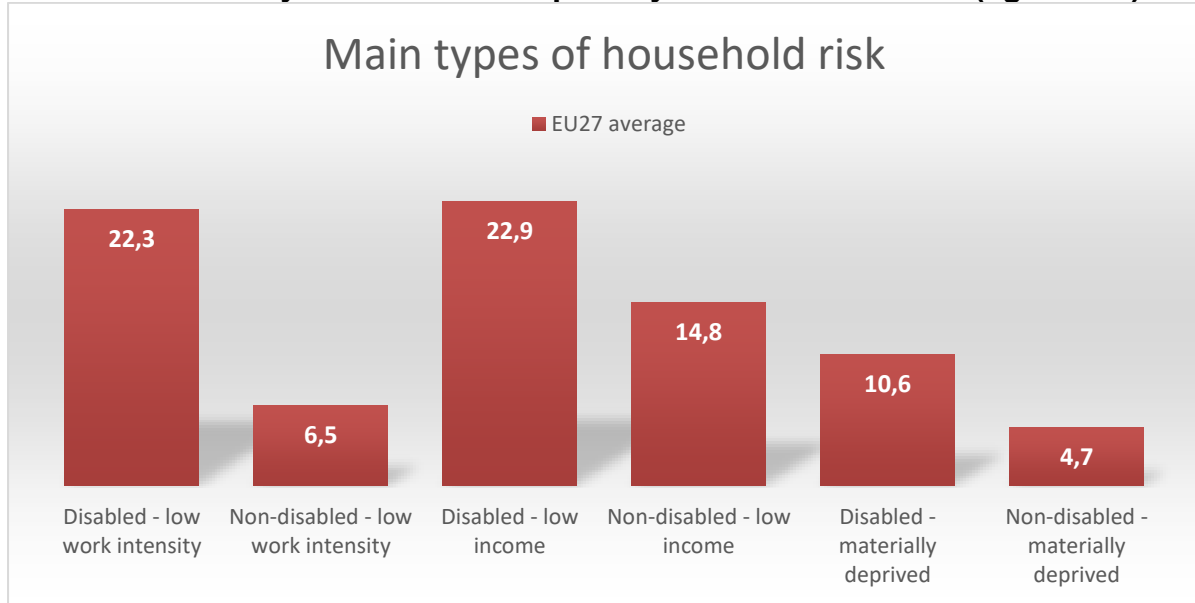
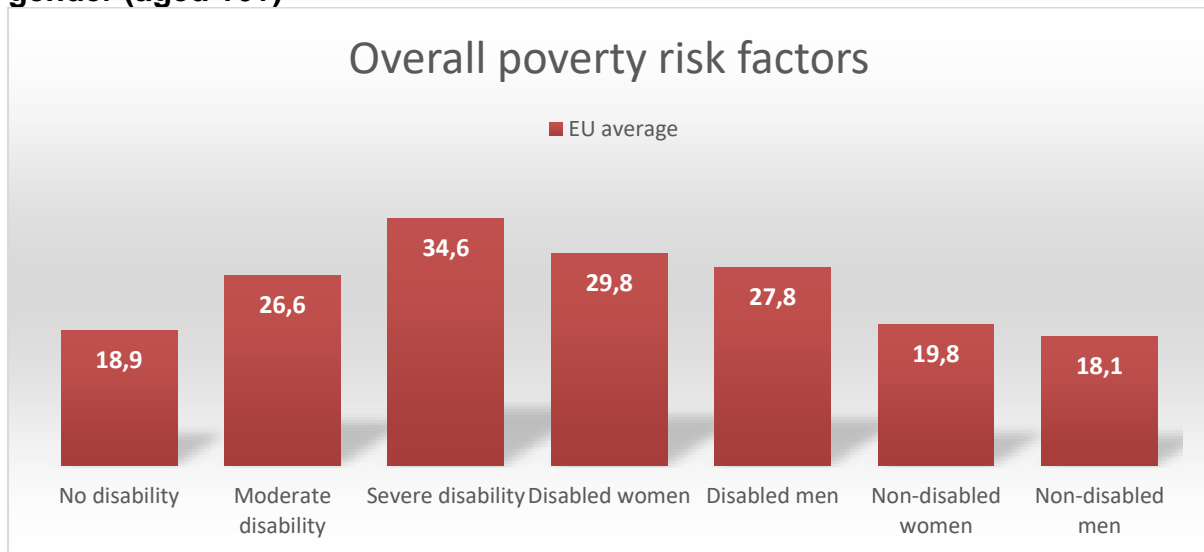
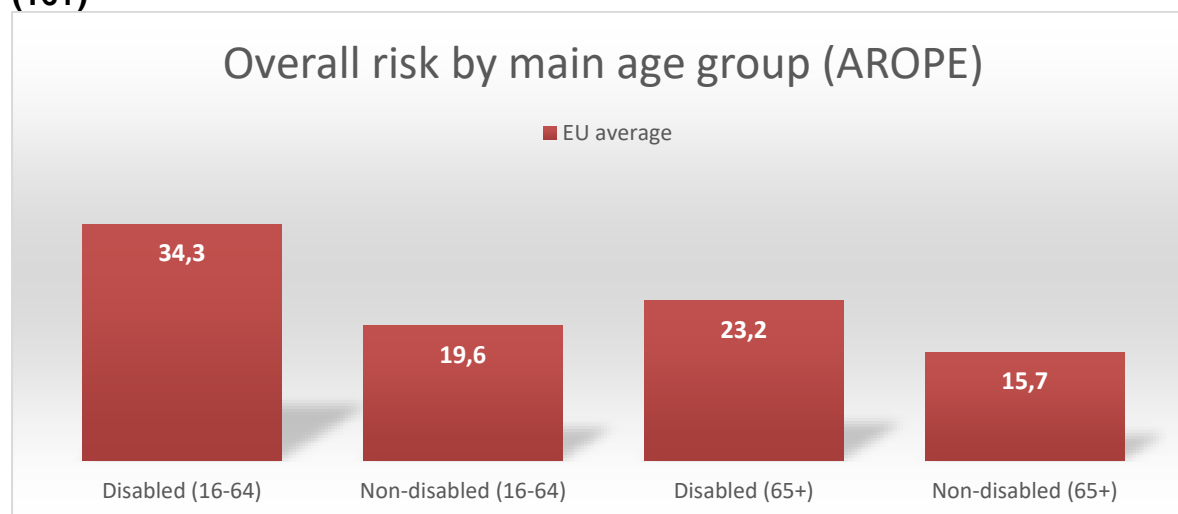
Table 19: Disability and the risks of poverty or social exclusion (age 16-59)**Table 20: People living in household poverty or exclusion by disability and gender (aged 16+)**

Table 21: Risk of household poverty or exclusion by disability and age group (16+)

Source: EU-SILC UDB 2020 – accessed April 2022

Following the analysis of the labour market situation it is relevant to consider policy priorities and to contextualise general trends or anomalies arising from the headline statistics. It is important to acknowledge, for example, that the socio-economic situation varies considerably among the Member States and that this should be considered when measuring disability equality. In essence, persons with disabilities have rights to equality of opportunity and participation compared to other persons in the same population. For this reason, equality gaps and ratios per country are as important as headline rates (e.g. countries with lower levels general poverty should have lower levels of disability poverty too and a higher national average rate does not necessarily imply greater equality within a country).¹⁰²

Rates of financial poverty, before and after social transfers, for different age groups, appear to be the most policy-relevant measures. A measure of in-work-poverty is also relevant from a policy perspective.

5.3.3 Age factors in poverty risk

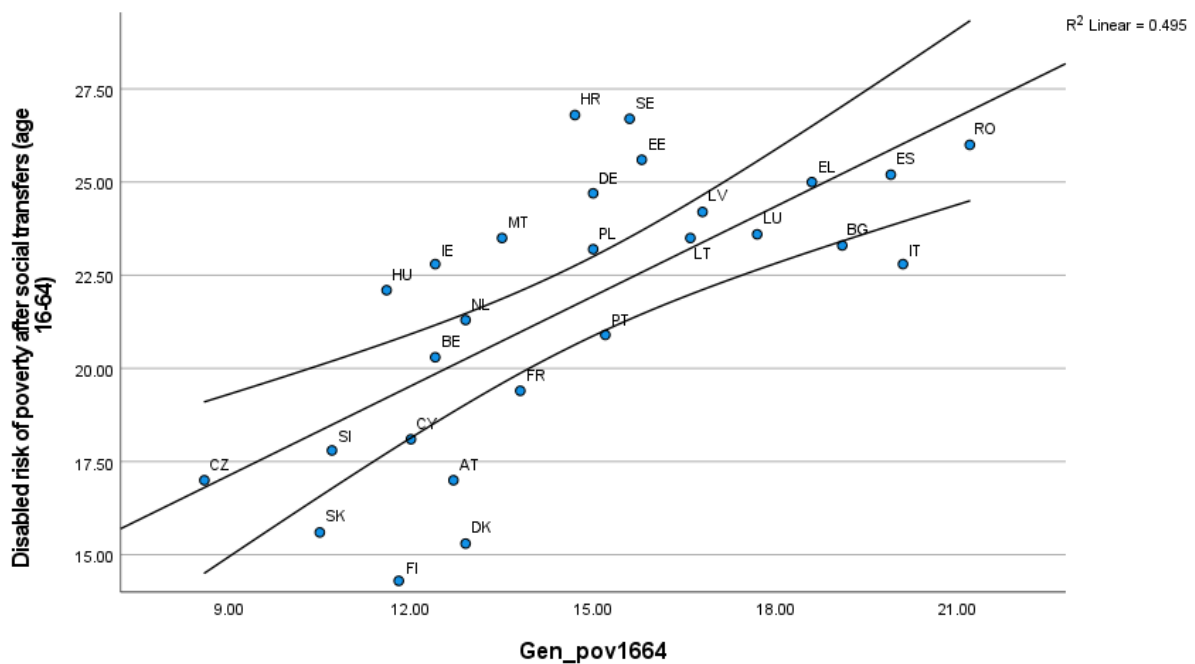
As mentioned earlier, age plays a significant part in explaining average risks of poverty among persons with disabilities in European countries. The prevalence of impairment increases rapidly with age, from mid-adulthood onwards. Persons with disabilities in old age are at higher risk of poverty than other persons of similar age. They include two groups that cannot be easily disaggregated from the SILC data. Some experienced disability during their younger life and have grown old with impairment but many older persons acquire impairments later in life. In terms of poverty risk, the latter group might benefit from the protective influence of occupational or public pension rights accumulated previously as adults without disabilities (with less risk of exclusion from employment).

¹⁰² The effect of prevalence estimates is also relevant for consideration as context to the interpretation of these measures.

To understand the differences in poverty risk for older and younger adults with disabilities it is helpful to examine the comparison with other persons in the same age group in more detail. Figure 26 plots the general risk of poverty among 16-64 year-olds in each Member State with the risk for persons with disabilities in that age group (using a similar method to the plots summarising the labour market situation earlier). Figure 27 shows similar comparison for those aged 65 and over. This suggests that average risk of poverty after social transfers, among older people in general, very strongly predicts poverty risk among older persons with disabilities ($r = .989$; $p < .01$; $R^2 = 0.979$). This positive association predicts more than 90 % of the variation between countries in disability poverty risk rates for this age group but only about half of the risk among the working age group ($r = .703$; $p < .01$; $R^2 = 0.495$).¹⁰³

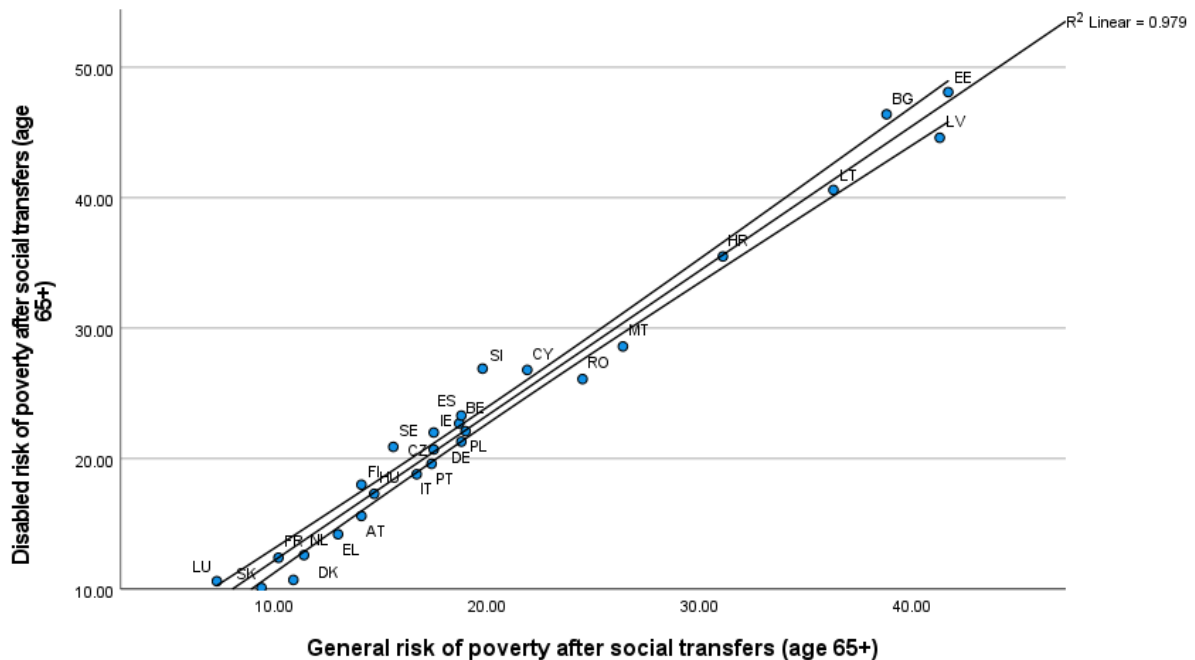
In 2020, the disability poverty rates after social transfers were higher than predicted from the general trend for working age people in Croatia, Sweden, Hungary, Ireland, Malta, Germany and Estonia. They were somewhat lower than predicted in Finland, Denmark, Austria and Slovakia. This might reflect differences in social protection levels but should be contextualised for methodological artefacts, and for the exceptional circumstances then emerging from the COVID-19 crisis.

Figure 26: General poverty risk and disability poverty risk rates (aged 16-64) in 2020



¹⁰³ This is partly accounted for by the fact that an increased proportion of the general population contains the comparator group of persons with disabilities, but the general comparison helps to dilute the prevalence effect discussed earlier.

Figure 27: General poverty risk and disability poverty risk rates (aged 65+) in 2020



This is relevant from a policy perspective because it suggests that general poverty alleviation measures targeting older people, including old age pensions, might benefit a significant proportion of persons with disabilities (in Denmark the risks after social transfers are equivalent). It is also relevant that many in this age group will have accumulated occupational pension protection during their working lives prior to becoming disabled. However, the use of an average indicator can mask the hidden costs of living with disability in old age and the accumulated disadvantage faced by the minority who have long-standing or more severe impairment conditions. Added to this are the potential costs of means-tested long-term care services. Targeted disability policies are still needed to close the disability poverty gap in old age.

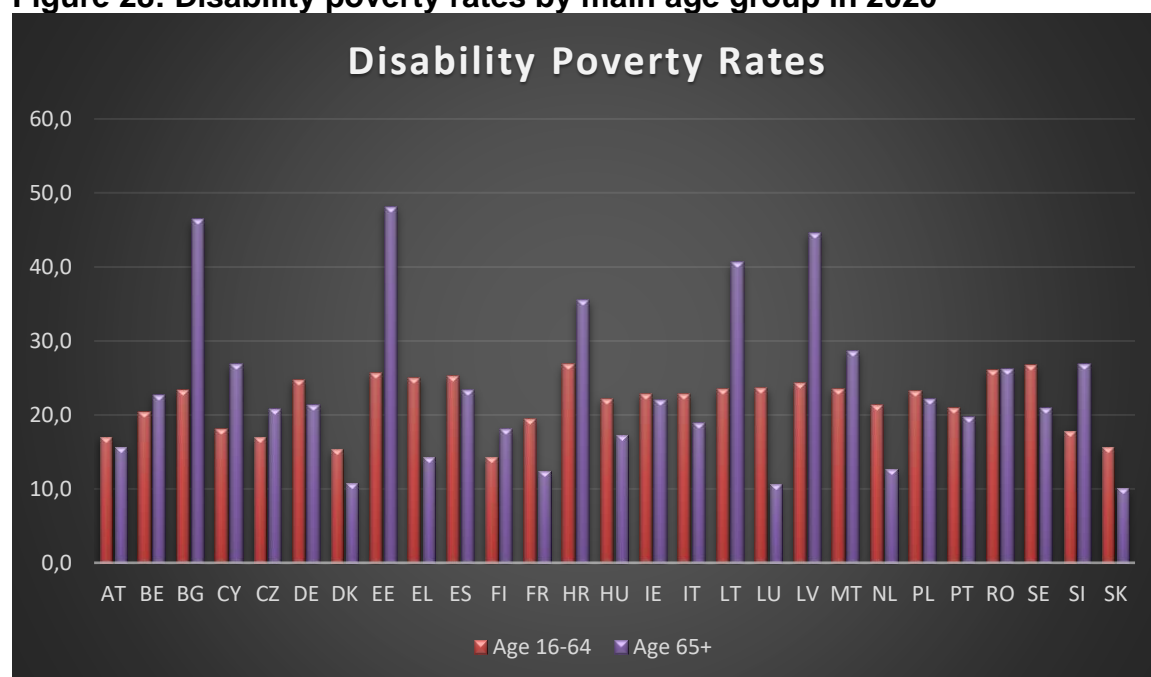
By comparison, general levels of poverty risk do not predict the variation of risk for younger adults with disabilities as clearly. Countries with lower poverty risks in this age group do tend to have lower risks for persons with disabilities ($r = .703$; $p < .01$) but the explanatory power of this positive association is weaker. This is due to the variable influences of employment chances (discussed earlier) and the adequacy of social protection benefits (including disability benefits) in different countries.¹⁰⁴

Observing the differences between the main age groups reveals several anomalies of policy interest. In particular, while the average risk of poverty after social transfers is higher for working age persons with disabilities in some Member States the reverse is observed in others. For example, in 2020 the poverty rate for older people in Bulgaria, Estonia, Latvia, Lithuania and Croatia appeared much higher than for younger adults, but the reverse was indicated for Luxembourg. This is shown in Figure 28 and might be explained by a combination of differences in labour market opportunities, social

¹⁰⁴ It may also be affected to some extent by variations in the reported rate of disability prevalence, as discussed earlier (but this is not the determinant factor).

protection policies, or sampling/response factors in national surveys. It is important to underline that these are measures of financial poverty relative to a national norm.

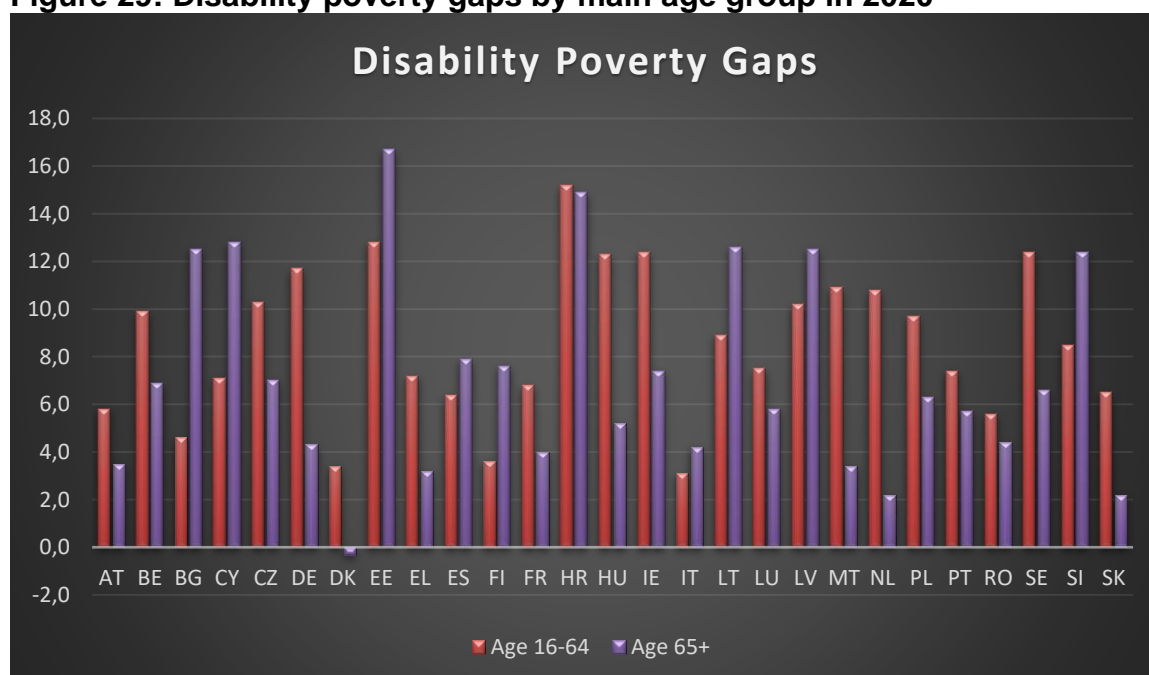
Figure 28: Disability poverty rates by main age group in 2020



Source: EU-SILC UDB 2020 – accessed April 2022

These anomalies are further evident when we look at disability equality gaps in the risk of poverty. In most countries these gaps are wider among younger adults but in some countries this pattern is reversed (notably in Latvia, Estonia and Bulgaria).

The poverty gaps between the rate of risk for persons with and without disabilities in each age group are shown in Figure 29. Some of these risk gaps are substantial, for example in the working age group it was more than ten percentage points in ten Member States in 2020 (and above 15 points in Croatia). For the older group it was above ten points in seven Member States (nearly 15 points in Croatia and above in Estonia). In Denmark, where poverty risk is very low, older persons with disabilities retained a marginal advantage over their peers without disabilities, on average. Such anomalies draw attention to the relative nature of the disability poverty measure, relative to average income and relative to persons without disabilities.

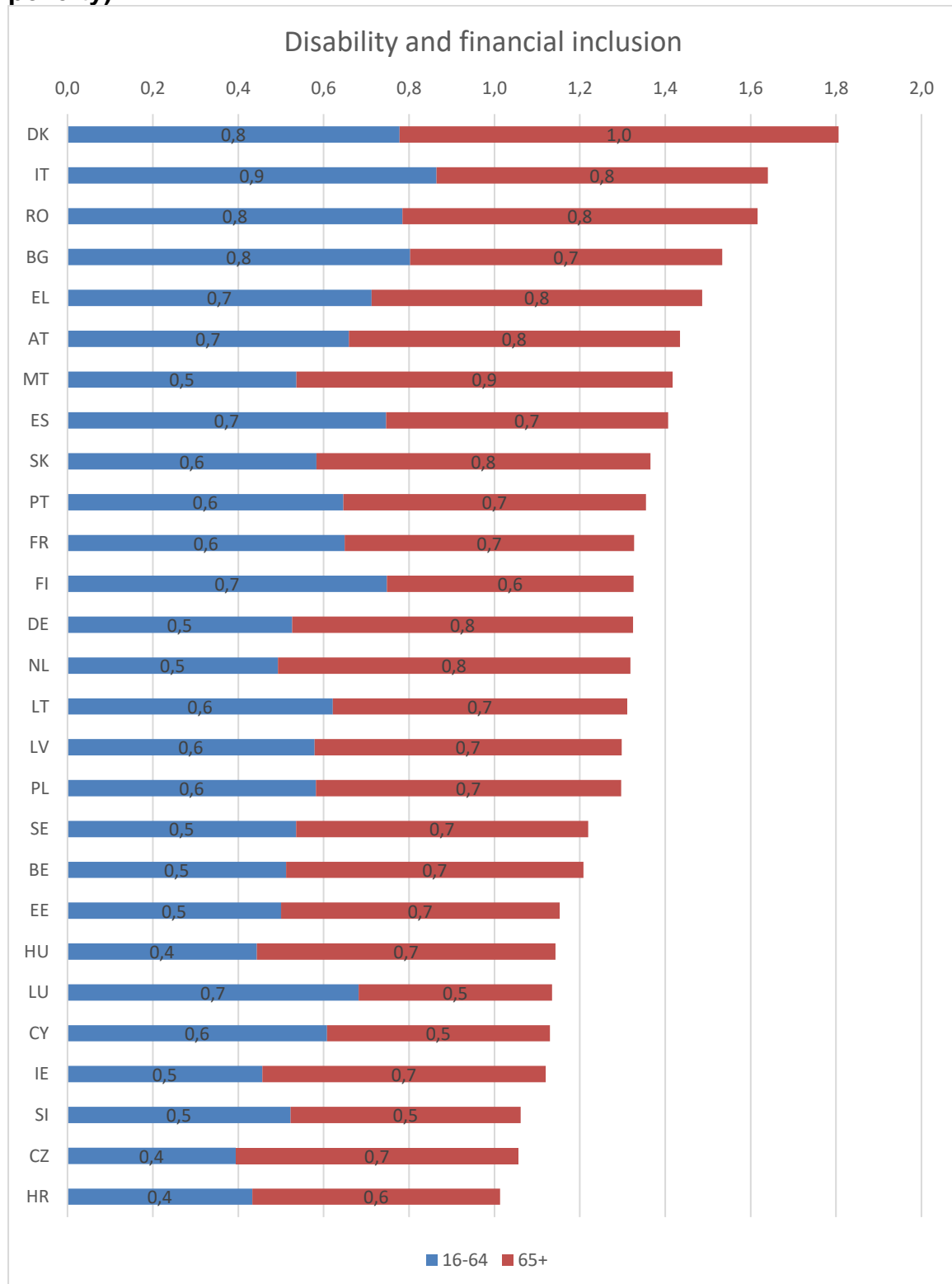
Figure 29: Disability poverty gaps by main age group in 2020

Source: EU-SILC UDB 2020 – accessed April 2022

5.3.4 A summary indicator of poverty risk

On the basis of this review it is useful to distinguish indicators of poverty risk for the two main age groups in policy discussions (and to ensure that child poverty can be added in the future). It is also useful to compare relative disability risks within countries (using an inverted odds ratio may be helpful here, as shown in Figure 30). For example, where the risk of living in poverty is 2 times greater for persons with disabilities than other persons then the inverted ratio (0.5) represents the chances of not living in poverty. Using these odds has the effect of standardising the poverty rate indicators to represent the relative chances of persons with disabilities in each age group, compared to other persons in the same groups.¹⁰⁵ In practice, these risks arise from the interaction of labour market inclusion and social protection policies over a lifetime. Relative poverty risk provides a good, and well tested, method to compare within and between countries but it is interesting to look also to the relative chances of being in poverty across countries. However, considerable caution is needed when contextualising poverty risk using data at the onset of the COVID-19 crisis in 2020.

¹⁰⁵ I.e., the risk estimation is reversed as a ratio of non-disabled poverty risk to disabled poverty (so that 1 rather than 0 equates to parity between groups, as indicated for Denmark in 2019-2020).

Figure 30: Disability poverty risk ratios in 2020 (1 / risk, chances of not being in poverty)

Source: EU-SILC UDB 2020 – accessed April 2022

6 Summary and conclusions

This synthesis report provides an overview of the 2022 Semester cycle, from a disability perspective, and in preparation for input to the 2023 cycle. It draws on evidence of disability mainstreaming in the Semester documentation (the Autumn and Spring Packages), as well as relevant themes from the Recovery and Resilience Plans, from dialogues with the UN CRPD Committee, from the current disability strategies and action plans of the EU and its Member States, and from the most recent EU data indications (for the year 2020).

The formats of the Semester and the EDE disability country fiches were amended in 2021 but return now to a more normal pattern in 2022-2023. There is an opportunity to examine new National Reform Programmes, Commission Country Reports and Country Specific Recommendations. There is new information for some Member States from the CRPD dialogue, which may be important for disability mainstreaming in the Semester, and some new information about national disability action plans. The investment decisions made in 2021, concerning the Recovery and Resilience Facility, remain relevant but the focus now shifts to implementation and evaluation of funded projects. The addition of a disability employment gap indicator in the Social Scorecard is a significant step forward, although relying on an interim method of calculation so far in 2022. Caution is needed when interpreting this, and other indicators based on data from the 2020 at the onset of the COVID-19 crisis and responsive measures. These had significant impacts on employment, household income and access to services, including health services. Some volatility in the data is inevitable, and with varying impacts between countries. The report revisits some key questions about the reliability of disability equality data from EU-SILC (with regard to age and impairment prevalence) and presents synthetic indicators derived from the headline statistics, which may aid future analysis.

In June 2022 the employment and social affairs ministers of the EU Member States presented their national targets for 2030 to achieve the EU2030 headline targets.¹⁰⁶ The three headline targets mirror the social concerns of the Semester and the thematic priorities of the disability country fiches prepared by EDE (with employment, skills and poverty or social exclusion). Namely, at the EU level:

- at least 78 % of people aged 20 to 64 should be in employment;
- at least 60 % of all adults should participate in training every year;
- the number of people at risk of poverty or social exclusion should be reduced by at least 15 million, including at least 5 million children, compared to 2019.

The Social Pillar action plan emphasises that action is needed to ensure that discouraged groups (including persons with disabilities) participate fully in the labour market. As shown in this synthesis report, the exclusion of persons with disabilities from full participation and equality in European labour markets, as well as deficiencies in social protection systems, makes a notable difference to achieving these targets. There remain large disability equality gaps in many EU Member States in each of these areas. Closing them will be a necessary part of the overall task and requires a

¹⁰⁶ State of Play on the National Targets For 2030, release 16 June 2022, <https://ec.europa.eu/social/BlobServlet?docId=25728&langId=en>

targeted approach to achieving this. Creating more accessible and inclusive job opportunities, providing flexible and long-lasting employment and educational support, and ensuring the adequacy of social protection systems will be key. This, in turn, requires renewed attention to mainstreaming disability equality as a core concern in developing and monitoring employment, training and social protection strategies and measures. Ensuring that the disability dimension is adequately addressed by the EU institutions and the Member States in the 2023 Semester process will be an important indicator of the extent to which this is happening.

The addition of a disability employment gap indicator in the Social Scoreboard is an important step forward and illustrates how disability equality can be easily mainstreamed. Doing this in one key target area also demonstrates the potential for mainstreaming in the other two (adult learning and poverty reduction). There is a close relationship between employment and poverty reduction, and at least two Member States choose to set 'poverty reduction' (AROPE) targets for work intensity only.¹⁰⁷ As the composite AROPE measure does not include work intensity for persons aged 60 and over, it is unclear precisely how this will be monitored. However, as this synthesis report shows, financial poverty after social transfers is a key indicator of outcomes for households including persons with disabilities (a majority of whom may be above normal working age or unable to work intensively). A focus on this, and the effectiveness of social policies in addressing it, should be maintained where possible.

The strong Semester policy focus on employment is important but introduces an analytical bias towards persons of traditional working age. This should not obscure the importance of analysing the risks in other age groups (notably among older workers and retired persons, but also children) which would make useful future studies. In addition, it is relevant to note that the main age bands discussed in this report are under active review by the Commission and Eurostat to establish whether a redefinition would be coherent with rising retirement pension ages above 60-65 in the Member States. This would have a notable effect on the estimation of disability equality statistics, given the over-representation of people acquiring impairments in later life. It would also impact on consideration of 'early' exit from the labour force.

The raised profile of the Social Pillar, as well as the pandemic response, have heightened concerns with support for more flexible employment and for stronger social policies (including income protection, social care and access to health care). There is an opportunity to capitalise on these themes from a disability perspective – for example, to argue for investment in flexible working arrangements and reasonable accommodation that support more persons with disabilities in quality jobs, including teleworking where appropriate. The attention drawn to vulnerabilities in the pandemic drew attention to the need for more rapid deinstitutionalisation but also for adequacy of social support in communities to promote independence and minimise social isolation. Added to this, several of the investment priorities identified in the Recovery and Resilience Plans have the potential to tackle situations of inaccessibility or exclusion (for example, by improving access to public transport or digital public services). If disability equality is not addressed in these investments then exclusion may be compounded.

¹⁰⁷ Denmark and Germany express their national 'poverty reduction' targets as a reduction in the number of persons living in households with very low work intensity.

Most persons with disabilities in Europe are older persons, impairment onset increases with age and Europe's populations are ageing (although new migration patterns may also mitigate this to some extent). The sustainability challenges of longer working lives, pensions, healthcare and long-term care affect older persons with disabilities disproportionately. While their average risk of poverty remains lower than younger adults this should not mask the challenges they face (including needs for accessible housing, additional costs of living, transport accessibility and so on). Many of the policy debates presented in the Semester as challenges of 'ageing' are in fact disability challenges and should be analysed from that perspective.

The resumption of a more familiar Semester reporting cycle provides greater opportunities to inject a disability perspective in the analysis (and this is evident in some of the 2022 National Reform Programmes and Commission Country Reports). However, the fiscal challenges arising from the COVID-19 crisis, and the immediate challenges arising from the integration of refugees from the war in Ukraine, demand priority attention. In this context it is important to ensure that disability equality issues are not obscured and that they retain at least a routine level of visibility in the Semester.

There is an opportunity to enhance policy coherence and coordination in the Semester process by acknowledging the connections between the disability evidence collected for national disability action plans, that reported to the UN CRPD Committee, and that reported in the Semester. Several of the Member States have made reference to their national disability plans in the National Reform Programmes in 2022, and some of these also make links to EU disability strategy. Facilitating these synergies across the multi-level governance of disability policies (national, European and global) would help to spread good practice in disability mainstreaming among the Member States and also bolster the EU's role as a regional integration organisation under the UN CRPD. As noted last year, the introduction of explicit guidance on equality mainstreaming in the Recovery and Resilience Plans in 2021 was a promising development and would be most useful if also applied to guidance on the preparation of National Reform Programmes in the 2023 Semester.

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