



## EUROPEAN UNION OF THE DEAF

A European Non-Governmental Organisation in official liaison with  
European Parliament, European Commission and the Council of Europe

### **EUD Policy Recommendations on the updated European Union Strategy for the Rights of Persons with Disabilities**

#### **Summarised version**

#### **Context**

In March 2021, the European Commission adopted the second 10-year Strategy for the Rights of Persons with Disabilities following close consultation with the European representative organisations of persons with disabilities, including the European Union of the Deaf (EUD). The European Strategy for the Rights of Persons with Disabilities 2021-2023 (ESRPD) aims to ensure the full inclusion of persons with disabilities in society, enabling them to enjoy their rights on an equal basis with others in line with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). It establishes a roadmap to remove barriers, combat discrimination, and ensure accessibility across various sectors. It is divided into eight main themes and contains seven flagship initiatives as well as actions. The ESRPD has been implemented in an Action Plan between 2021 and 2024 and the European Commission is preparing a progress report on the first phase of the Strategy. The Commission is currently planning to issue new actions and flagship initiatives to implement in the second phase of the Strategy, under a renewed Action Plan 2025-2030.

The European Union of the Deaf supports the European Strategy for the Rights of Persons with Disabilities to ensure its implementation addresses the systemic barriers faced by deaf people and fulfils their rights enshrined in the UN Convention on the Rights of Persons with Disabilities, with a particular focus on their linguistic rights as National Sign Language users.

As the only supranational organisation representing all deaf people before the European Union through a network of National Associations of the Deaf from 31 countries, the European Union of the Deaf (EUD) would like to share its most pressing policy recommendations, ensuring the achievement of the rights of deaf people in the new Action Plan 2025 – 2030 of the Strategy. While the European Union of the Deaf fully

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supports the proposed [priority actions and flagships presented by the European Disability Forum](#), we wish to present a complementary perspective on addressing the sign language rights of deaf people to ensure they are on equal footing with other citizens in the European Union.

Since the European Commission is committing to implement the Strategy, the EUD recommendations are formulated to enhance the significant role the European Commission can play in the achievement of deaf people's rights. Whenever applicable, the EUD also formulated some recommendations encouraging the European Commission to lead by example, to foster interinstitutional cooperation with other EU institutions, and to coordinate some initiatives to be implemented at the national level. The EUD recommendations are mentioned under the relevant themes and chapters of the Strategy.

## **EUD's recommendations for the implementation of the European Strategy for the Rights of Persons with Disabilities from 2025 to 2030**

### **1. Accessibility - an enabler of rights, autonomy and equality:**

Recommendation: Officialisation of EU National Sign Languages (NSLs) as EU official languages.

The EUD recommends the European Commission to undertake the following actions:

- 1.1. Revision of Regulation 1/1958 to incorporate the EU 29 National Sign Languages (NSLs) as official EU languages next to the current 24 official languages.
- 1.2. Development of guidelines of the Rules of Procedure of all public institutions, at both the European and national levels, to ensure EU institutions and national governments include NSLs in their procedures.

### **2. Enjoying EU Rights:**

Recommendation: Remove barriers in the freedom of movement of deaf people in the EU.

The EUD recommends the European Commission to undertake the following actions:

- 2.1. Amend Regulation (EC) No 883/2004 to include sign language interpretation services in work-related benefits.
- 2.2. Adopt a directive to ensure portability of disability rights and benefits across Member States.
- 2.3. Centralise information on NSL interpretation services in the AccessibleEU Centre.
- 2.4. Coordinate an access to NSL interpreting services for deaf learners and sign language users moving to another EU country for education and training purposes.

### **3. Decent quality of life and independent living:**

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Recommendation: Ensure access of deaf people to inclusive national sign language work environments.

The EUD recommends the European Commission to undertake the following actions:

- 3.1. Revise EU Social Scoreboard to include disaggregated disability indicators.
- 3.2. Increase data collection efforts on the number of deaf people in employment.
- 3.3. Design policies ensuring inclusive labour environments in NSL for deaf people.
- 3.4. Monitor employment targets for deaf people through consultation with representative organisations.

#### **4. Equal access and non-discrimination:**

Recommendation: Increase access of deaf people, especially deaf women and girls, to healthcare in national sign languages.

The EUD recommends the European Commission to undertake the following actions:

- 4.1. Develop policy guidance for accessible healthcare in NSLs.
- 4.2. Promote disaggregated data collection on healthcare access for deaf people.
- 4.3. Facilitate the mapping and exchange of good practices of existing healthcare facilities accessible to persons with disabilities, including deaf people.
- 4.4. Promote and safeguard sexual and health reproductive rights of women with disabilities, including deaf women and girls, in the new Gender Equality Strategy.

#### **5. Promoting rights globally:**

Recommendation: Include deaf people in EU migration and refugees' policies.

The EUD recommends the European Commission to undertake the following actions:

- 5.1. Coordinate the Member States' development of accessible information in NSLs for deaf refugees and asylum seekers, in close consultation with representative organisations of deaf people.
- 5.2. Develop guidelines for the Member States to ensure inclusion in sign language for deaf refugees and asylum seekers in practices and standard operating procedures.
- 5.3. Allocate funding to provide national-based disability-inclusive training of migration officials and staff on how to ensure the linguistic rights of deaf refugees and asylum seekers are fulfilled during the procedures.
- 5.4. Mainstream a disability cross-cutting perspective in the new European Strategy on migration and asylum and provide targets toward the safeguarding of the rights of deaf refugees and asylum seekers.

#### **6. Efficiently delivering the strategy:**

Recommendation: Inclusion of deaf people and their representative organisations in the project development and implementation under the EU funding programmes.

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The EUD recommends the European Commission to undertake the following actions:

- 6.1. Revise inclusive measures to ensure full participation of representative organisations in the project development and partnership in disability-related projects.
- 6.2. Provide complementary funding to cover inclusion costs, including NSL interpretation and translation.

## **7. Leading by example:**

Recommendation: Improve the accessibility of the EU institutions in both National Sign Languages (NSL) and International Sign (IS).

The EUD recommends the European Commission to undertake the following actions:

- 7.1. Revise the Web Accessibility Action Plan by consulting deaf experts and representative organisations of deaf people to ensure their right to information in sign language.
- 7.2. Ensure SL accessibility of the European Commission's citizens engagement platforms such as the "Have Your Say on Europe" and the Citizen's Engagement Platform.
- 7.3. Amend the EU institutions' Communicating in Europe Partnership to include SL access.

## **8. Awareness, governance, and measuring progress:**

Recommendation: Improve data collection and indicators to reflect intersecting identities and human rights-based approaches on deaf people.

The EUD recommends the European Commission to undertake the following actions:

- 8.1. Expand EuroStat disability indicators to include disaggregation by identity layers, following the EUD Statement on Intersectionality (i.e. gender, ethnicity, age).
- 8.2. Collaborate with representative organisations of persons with disabilities to develop data collection strategies aligned with UNCRPD standards, including linguistic rights of deaf people.

## **Conclusion**

The European Disability Strategy provides a vital framework to address the barriers faced by persons with disabilities, including deaf individuals. By integrating the EUD key recommendations into the Action Plan 2025-2030, the European Commission can advance the inclusion of deaf people, ensuring their linguistic rights and access to opportunities across all sectors.

Through continued collaboration with representative organisations, including the EUD, the European Commission must conduct these actions to not only enhance the lives of deaf people but also reaffirm the EU's commitment to diversity, inclusion, and human

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rights for all, in line with the UN Convention on the Rights of Persons with Disabilities to achieve a meaningful Union of Equality.

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All the publications from 2022 – 2026 are co-funded by and produced under the European Commission's Citizens, Equality, Rights and Values (CERV)



Programme.