



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

Introduction:

In March 2021, the European Commission adopted the European Strategy for the Rights of Persons with Disabilities 2021-2023 (ESRPD). This strategy 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. Since 2024, the European Commission is preparing a progress report on the first phase of the European Strategy for the Rights of Persons with Disabilities.

The Commission is currently planning to issue new actions and flagship initiatives to implement in the second phase of the Strategy. 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 would like to share its most pressing policy recommendations, ensuring the achievement of the rights of deaf people in the course of the new Action Plan 2025 – 2030 of the Strategy.

While the European Union of the Deaf fully 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.

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This document will address the main issues faced by deaf people in the European Union and will present policy recommendations under the relevant themes and chapters of the Strategy. These recommendations consist of priority actions the Commission could include in the new priority actions and flagships of the Strategy.

Executive Summary

The European Commission is currently developing new flagship actions for 2025-2030 under the scope of the Strategy for the Rights of Persons with Disabilities 2021–2030. To ensure the inclusion of deaf people in the new Action Plan 2025-2030, the European Union of the Deaf (EUD) presents its recommendations with a focus on sign language rights for each of the eight themes of the Strategy:

1. Accessibility:

Recommendation: Officialisation of EU National Sign Languages (NSLs) as EU official languages through the revision of Regulation 1/1958 and the development of guidelines of the Rules of Procedures at European and national levels.

2. Freedom of movement:

Recommendation: Remove barriers to mobility for deaf individuals by ensuring the portability of disability rights and services across the EU including the right to access sign language interpretation services.

3. Decent quality of life and independent living

Recommendation: Foster employment of deaf people through the conduction of disaggregated data collection efforts, the monitoring of employment targets and the promotion of NSLs inclusive labour environments.

4. Equal access and non-discrimination

Recommendation: Improve healthcare access for deaf people through policy guidance, disaggregation data collection and mapping of good practice examples, with a specific attention for deaf women and girls and their sexual and reproductive health rights.

5. Promoting rights globally

Recommendation: Include deaf people in EU migration and refugees' policies, both at the European level through the new European Strategy on migration and asylum, and at the national level through accessible information, guidelines and training on their linguistic rights.

6. Efficiently delivering the strategy:

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

7. Leading by example

Recommendation: Increase deaf citizens' participation in the EU democratic life by improving accessibility of EU institutions through NSLs and International Sign (IS), specifically with the to be revised European Commission's Web Accessibility Action Plan, the EU institutions' communication policies, and the provision of SL on the citizens

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engagement platforms.

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 calls on the European Commission to lead by example and to include these recommendations in the 2025–2030 Action Plan. This approach will ensure the rights of deaf people are upheld, contributing to a more inclusive European Union in line with the United Nations Convention on the Rights of Persons with Disabilities to meaningfully achieve a Union of Equality.

1. Accessibility – an enabler of rights, autonomy and equality: Officialisation of EU national sign languages as EU official languages

The European Union has a rich and diverse multilingualism with 24 spoken languages and 29 national sign languages (NSLs). NSLs are full languages with the same linguistic properties as spoken languages and are used by more than one million deaf people across the EU. All 27 EU Member States have recognised NSLs as full languages with various linguistic status, recognizing the linguistic rights of deaf people. It also facilitates their access to information and interactions with their governments as enshrined in Article 21 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). However, in its multilingualism policy, the EU does not give any consideration to the 29 NSLs that co-exist in the EU, bringing an unjustified difference of treatment between spoken and signed languages. The European Parliament issued several resolutions acknowledging in 1988 that NSLs are “*the preferred or only language of most deaf people*”¹ and in 1998 that “*Member States give official recognition to sign language*”² and, in 2018, that they are “*an important element of Europe’s linguistic diversity*”³ and thereby calling in 2016 for the “*official recognition of national and regional sign language(s) (...) within EU institutions*”⁴ and reiterating in 2018 that “*these languages should be awarded official status*”⁵.

¹ European Parliament Resolution on Sign Language for the Deaf (Doc A2-302/87), Recital C

² European Parliament Resolution on sign languages, Official Journal C 379, 07/12/1998 P. 0066, Recital C.

³ European Parliament resolution of 11 September 2018 on language equality in the digital age (2018/2028(INI)), Recital A.

⁴ European Parliament resolution of 23 November 2016 on sign languages and professional sign language interpreters (2016/2952(RSP)), point 1.

⁵ European Parliament resolution of 13 November 2018 on minimum standards for minorities in the EU (2018/2036(INI)), Recital U.

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As part of its [2024 Position on the EU's recognition of the NSLs as official languages of the EU](#), the EUD calls the EU to comply with its obligation, as a State Party of the CRPD, to *officialise* EU NSLs as official EU languages and to take steps towards its recognition. Specifically, the EUD recommends the EU institutions to:

- 1.1. Issue a proposal for a revision of Regulation 1/1958 *determining the languages to be used by the European Economic Community* to **incorporate the 29 EU NSLs as official languages alongside the current 24 official languages**. This first step involves drafting amendments to Regulation 1/1958, proposing the inclusion of the NSLs as co-official languages of the EU. This amendment should be backed by a detailed impact assessment to address the logistical, financial, and procedural implications of such inclusion. Following this, extensive consultations with stakeholders, including national sign language users, National Associations of Deaf, linguistic experts, and Member States, are vital to ensure transparency in the process.
- 1.2. Create guidelines for the **amendments of the Rules of Procedures of all public institutions, at both the European and national levels**, to ensure the **inclusion of EU National Sign Languages**, in the case of a European institution, and the respective National Sign Language(s), in the case of an institution of the Member State. These amendments would ensure that NSLs users are able to interact with and impart information from the relevant institutions in their national sign language.

2. Enjoying EU Rights: Remove barriers to the freedom of movement of deaf people in the EU

Deaf people face significant barriers when moving from one Member State to another, as their disability must be reassessed following the new Member State's procedure before they become eligible for disability benefits. Not only do they face issues in accessing benefits as other persons with disabilities, but they are also denied the provision of national sign language interpretation services in the host Member State.

The EUD applauds the publication of the EU Directive establishing the European disability card but regrets it does not include access to sign language interpretation services for deaf people moving to a host Member State where their disability status is

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reassessed as emphasised by the European Parliament⁶. This major obstacle faced by deaf people in their freedom of movement in the EU is particularly relevant for deaf people moving for employment purposes both as a worker or as a job seeker, and for deaf students who are studying abroad, *inter alia* as part of the Erasmus+ programme. Due to sometimes lengthy procedure to reassess the disability status of deaf people in the host country, they are denied access to reasonable accommodation measures such as professional and accredited national sign language interpretation services in the host Member State and face huge communication barriers in their job search, new employment and/or studies, preventing them to exercise their right to free movement on an equal step with other EU citizens.

In its Resolution on sign languages and professional sign language interpreters, the European Parliament specifically urged the EU institutions that the “*principle of freedom of movement for deaf, deafblind and hard-of-hearing people within the EU be guaranteed, especially in the context of Erasmus+ and related mobility programmes, by ensuring that participants are not disproportionately burdened with having to take care of their own interpreting arrangements*”⁷. Moreover, in the EU Social Rights Pillar Action Plan, under the section on Labour Mobility, the Commission encourages the “*European Parliament and the Council to conclude negotiations on the revision of social security coordination rules*”⁸. The European Economic and Social Committee also identified “a clear need for the development of an EU social security benefits coordination system in the EU, including a clear framework for portability of rights with a maximum number of days for the disability recognition procedure”⁹. The European Parliament recognised that the EU Disability Card “*does not guarantee to people with a disability to keep their rights to social security benefits when moving to another EU country*” and reiterated the EESC’s proposal to the European Commission to develop a directive harmonising the recognition of disability assessment between Member States, thereby “*ensuring the portability of social security benefits, including personal assistance, either through their continued provision by the Member States of origin, provision by the new Member State of residence, or with a gradual transition between the two*”.

Finally, the Committee on the Rights of Persons with Disabilities recommended in 2015 to the European Union, under Article 18 of the UNCRPD “*to take immediate action to ensure that all persons with disabilities and their families can enjoy their right to freedom of movement on an equal basis with others, including with regard to the portability of*

⁶ European Parliament resolution of 23 November 2016 on sign languages and professional sign language interpreters, *idem*, point 28.

⁷ European Parliament resolution of 23 November 2016 on sign languages and professional sign language interpreters, *idem*, point 27.

⁸ European Commission, Labour Mobility, EU Pillar of Social Rights Action Plan.

⁹ European Economic and Social Committee, SOC/538 UNCRPD/EU Disability Strategy, 2016, point. 3.2.20.

social security benefits, in a coordinated manner across its Member States¹⁰. It also addressed this issue in 2022 in its List of Issues Prior to Reporting by inquiring on *“the impact of administrative requirements, such as disability assessment and qualifications for and transfer of social security benefits, on the ability of persons with disabilities to exercise their right to move and reside freely within the territory of European Union member states¹¹”*.

Indeed, the new 2024 Directive on establishing the European disability card does not apply to *“benefits in the area of social security under Regulation N°883/2004 (and) (...) to special conditions or preferential treatment for access to services offered to persons with disabilities in consideration of their individual needs and upon the fulfilment of additional criteria, on the basis of an individual assessment or of a decision on entitlement to specific services¹²”*.

With the aim of achieving effective freedom of movement of deaf people in the EU, the EUD recommends the EU institutions to undertake the following actions as addressed in the [EUD Position Paper on Freedom of Movement](#) and [EUD Policy Recommendations on the European Disability Card](#):

- 2.1. Amend the current Regulation (EC) No 883/2004 or adopt new legislation that coordinates the work-related benefits that grant **access to national sign language interpreting services for economically active deaf persons who exercise their right to freedom of movement**. ‘Work-related benefits that grant access to national sign language interpreting services’ means “any benefit in kind, cash or combination of both that is provided to economically active deaf persons to guarantee their access to sign language interpreting services in another European country with the objective of supporting their access to, inclusion and retention in the labour market”.
- 2.2. Adopt a new directive that highlights the shared responsibility of Member States for disability support towards EU citizens with disabilities moving from one Member State to another. The legislation could ensure the **portability of the benefits, including the right to access national sign language interpretation services**, from the Member State of origin until the disability assessment has been completed in the host Member State; or facilitate the mutual recognition of disability between Member States. This would allow

¹⁰ CRPD Committee, CRPD/C/EU/CO/1, point 18.

¹¹ Committee on the Rights of Persons with Disabilities’ List of Issues Prior to Reporting to the European Union, CRPD/C/EU/QPR/2-3, paragraph 20(a).

¹² EU Directive 2024/2841 of the European Parliament and of the Council of 23 October 2024 establishing the European Disability Card and the European Parking Card for persons with disabilities,

deaf persons to rapidly access national sign language interpreting services. Deaf people will be able to access information and communication faster in cross-border situations, fulfilling their right to freedom of movement.

- 2.3. **Centralising all information on existing national sign language interpretation services** provided by different Member States in the AccessibleEU Centre. This would allow deaf people and other national sign language users to make informed decisions by learning about the availability, affordability, accessibility and quality of sign language interpreting services before physically moving to another country in the European Union.
- 2.4. Efficiently coordinate **access to national sign language interpreting services for deaf learners** and sign language users who wish to move to another European country for the purposes of education and training. This should clarify which country and institution provides the national sign language interpretation while participating in the Erasmus+ Programme, and should enable deaf learners the full accessibility of their learning mobility through high-quality, affordable, accessible and available professional national sign language interpreting services.

3. Decent quality of life and living independently: Ensure access of deaf people to inclusive national sign language work environments

The employment rate of deaf people in the European Union is, as of today, unknown. The EUD estimates, based on academic research¹³, that the number of deaf people in the EU is approximately 1 million. This represents 0,2% of the totality of the EU population of 448,4 million; if applied to the number of people of working age within the EU, the number of deaf people of working age should be 386,916. Since there is a lack of statistics to measure the situation of deaf people when accessing and within employment, one can assume the employment percentage could be similar to the one estimated for persons with disabilities aged 20-64, which is 50,8% of them are employed¹⁴. However, at the national level, several cases and statistics reveal that deaf people are more likely to be discriminated against in their job prospects and/or employment compared to other persons with disabilities.

This is further exacerbated by the intersecting identities and experiences of deaf people comprising of their racial or ethnic origin, religion, languages, gender identity, disabilities, socio-economic status, sexual orientation, age and any other layers of identities, as highlighted in the EUD Statement on Intersectionality¹⁵. As of today, the EU Social

¹³ Maya de Wit, "Sign Language Interpreting in Europe", 2016 edition, page 57.

¹⁴ Lecerf, Marie. *Employment and Disability in the European Union*. European Parliamentary Research Service (EPRS), PE 651.932, May 2020. Accessed on 16 January 2025. <https://www.europarl.europa.eu/thinktank>.

¹⁵ European Union of the Deaf. "Statement on Intersectionality." Accessed January 16, 2025. <https://www.eud.eu/statement-on-intersectionality-3/>.

Scoreboard does not disaggregate by disability in its indicator of the disability employment gap. It also does not take into consideration the intersecting identities of persons with disabilities, including deaf people. EUD supports the initiative taken by the European Commission to develop new disability indicators, including on the situation of persons with disabilities in employment, as part of the Strategy.

We encourage the European Commission to deepen this initiative by disaggregating data to support the EU Social Scoreboard and the European Semester. The lack of disaggregated data on deaf people by their intersecting identities in employment prevents the identification of the issues faced by specific categories of deaf people in their access to the labour market and therefore the integration of deaf-inclusive employment policies into the legislative and program development processes.

Not only there is a lack of statistics to measure the situation of deaf people when accessing and within employment but there is also a lack of understanding, in the EU, of the importance of national sign language-inclusive environments to ensure a fully accessible labour market for deaf people. In line with Article 27 of the UNCRPD and its General Comment N°8 on Inclusive Employment, the accessibility and inclusion of deaf people in the labour market itself through national sign languages must be guaranteed and throughout every aspect of engagement with the labour market, from recruitment process to professional development, in addition to training into the work life and the use of their labour and trade union rights.

Based on the [EUD Policy Recommendations on the Establishment of Targets for the Employment of Deaf People](#) and the [EUD Policy Recommendations on Access to Labour Market for Deaf Persons in the EU](#), the EUD recommends the European Commission to:

- 3.1. Revise the EU Social Scoreboard to include **indicators disaggregated by disability group**, including deaf people, **reflecting their intersecting identities** alongside their disability, including racial or ethnic origin, languages, gender identity, socio-economic status, sexual orientation, age and any other layers of identities to set new indicators.
- 3.2. Improve and increase **data collection efforts on the number of deaf people disaggregated by their intersecting identities in employment**, by utilising the EU Semester Process, in support of the European Pillar of Social Rights.
- 3.3. Design **specific policies towards ensuring inclusive national sign languages labour environments for deaf people**, in line with Article 27 UNCRPD and its General Comment N°8 to complement the establishment of the employment targets.

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- 3.4. Continually **monitor the progress made by the employment targets on the number of deaf people in employment**, using its obligations with the UNCRPD as guide, through meaningful consultation with EUD at the EU level and the National Associations of the Deaf at the national level.

4. Equal Access and non-discrimination: Increase access of deaf people, especially deaf women and girls, to healthcare in national sign languages

Deaf people face huge barriers in accessing healthcare across the EU. The most significant barriers are (1) the lack of accessibility to healthcare information in national sign languages due to lack of knowledge of these languages among health professionals; (2) the lack of awareness of medical practitioners on the cultural and linguistic identity of deaf people due to a lack of training provided to health professionals on the specific needs of this minority; (3) the lack of awareness by medical practitioners on national sign language interpreters, its shortage and lack of funding; and (4) the lack of recognition by the EU of the EU national sign languages as fully fledged languages on an equal footing with spoken languages.

After consultations with representatives of deaf women forums of our Member Organisations, it came to light that deaf women and girls face exacerbated barriers in their access to sexual and reproductive health and rights (SRHR)¹⁶. Specifically, deaf women and girls experience a serious lack of accessibility of communication and information in the healthcare sector, specifically on SRHR, in their National Sign Languages. Deaf women are systematically marginalised and experience attitudinal barriers due to their intersecting identities as disability rights holders, women, and members of a linguistic and cultural minority, the deaf community.

Among women with disabilities, of which 11% had unmet medical needs in 2023, compared to 3% of women without disabilities, deaf women are the most affected and prevented *“to exercise control over their own lives across a range of contexts, for example with regard to sexual and reproductive rights, including sexual and reproductive health services.”*¹⁷

The European Parliament noted that *“while the provision of health care is a Member State competence, it should cater for the needs of deaf, deafblind and hard-of-hearing patients, for example by providing professional sign language interpreters and staff awareness training, with particular attention to women and children”*¹⁸. Under the application of

¹⁶ EUD Report on Combatting Gender Based Violence and Discrimination Against Women and Girls in the EU, p. 3. Accessed on 16 January 2024.

¹⁷ United Nations Committee on the Rights of Persons with Disabilities, General Comment no.3 on Article 6 – Women with Disabilities, 25 November 2016, URL: <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-commentno3-article-6-women-and-girls>

¹⁸ European Parliament resolution of 23 November 2016 on sign languages and professional sign language interpreters, *idem*, point 14.

Article 25 of the UNCRPD, the CRPD Committee inquired the European Union to "provide information on measures taken to: (a) Promote access to sexual and reproductive rights for women and girls with disabilities, including accessible information on contraception, sexual education, gynaecological services and abortion services"¹⁹.

As part of its [Policy Recommendations on Access to Healthcare for Deaf Persons in the EU](#), the EUD calls the EU institutions to implement the following recommendations:

- 4.1. Design policy guidance for the EU Member States on how to achieve the highest standard of health for persons with disabilities, including deaf people and national sign language users. This guidance would include the **accessibility requirements for the healthcare settings and professionals to ensure communication and information in the national sign languages for deaf people**. The development phase of the guidance must be fully inclusive and involve the representative organisations of persons with disabilities, including the National Associations of the Deaf, to ensure their perspectives and requirements are fully taken into account.
- 4.2. Promote the **collection and analysis of disaggregated data on healthcare access of deaf people, with a focus on deaf women and girls**, at the national and EU levels, in collaboration with National Associations of the Deaf, with the aim of implementing improved health policies responding to accessibility requirements for deaf people.
- 4.3. Conduct a project aiming at mapping **existing healthcare facilities accessible to persons with disabilities, including deaf people**, in the EU Member States, facilitating thereby the exchange of good practices and the initiatives towards the accessibility of healthcare facilities in all EU Member States.
- 4.4. Address an action in the new Gender Equality Strategy post 2025 to promote and safeguard the sexual and health reproductive rights of women with disabilities, including deaf women and girls in the EU. This could include the development of information materials on their rights in accessible formats and in National Sign Languages in close consultation with the representative organisations of persons with disabilities.

5. Promoting the rights of persons with disabilities globally: Include deaf people in EU migration and refugees policies

Deaf people constitute one of the most vulnerable and marginalised groups in times of

¹⁹ Committee on the Rights of Persons with Disabilities' List of Issues Prior to Reporting to the European Union, CRPD/C/EU/QPR/2-3, paragraph 27.

armed conflicts and/or humanitarian emergencies. The Russia's invasion of Ukraine forced millions of people to leave their homes. Out of the 35,662 deaf Ukrainian people who are members of the Ukrainian Society of the Deaf, about 6,000 of them, including 712 children, sought refuge in the EU²⁰. Based on reports from its EU-based National Members, the National Associations of the Deaf, as well as of its Affiliated Member, the Ukrainian Society of the Deaf, many deaf Ukrainian refugees faced huge barriers in accessing information and communication provided by the EU Member States on their rights to shelter, healthcare, education, among other basic rights, due to the lack of accessibility in sign language as enshrined in Article 21 of the UNCRPD. In line with Article 11 of the UNCRPD, the European Union must undertake measures to protect the safety of persons with disabilities affected by the emergencies including the hostilities in Ukraine as addressed by the CRPD Committee in his List of Issues²¹. Indeed, the CRPD Committee recommended the "European Union to mainstream disability in its migration and refugees policies²²". The EUD applauds the adoption of the new Pact on Migration and Asylum to be implemented by the Member States by July 2016, and the Common Implementation Plan for this Pact addressing, in one of its building blocks, the "safeguards and guarantees for the applicants for international protection and people with specific needs²³".

With the recently adopted Pact on Migration and Asylum, the European Union of the Deaf wishes for the EU to take this momentum to comply with Article 11 of the UNCRPD read conjointly with Article 21 of the UNCRPD to:

- 5.1. **Coordinate the development of information material** to be issued by the Member States in close consultation with the representative organisations of deaf people such as the European Union of the Deaf, **to ensure its accessibility for deaf applicants in National Sign Languages.**
- 5.2. **Development of guidelines for the Member States to ensure the specific requirements of persons with disabilities, including deaf people,** are included in their "review and adaptation of existing practices and standard operating procedures (including identification of the specific needs and provision of accommodation in all steps of the procedure and in the reception). These guidelines could provide recommendations and good practice examples identified in some of the Member States through close collaboration

²⁰ Estimated data provided by our Affiliate Member, the National Association of the Deaf in Ukraine during the 2022 EUD Seminar held in France. Additional source: Deaf Ukrainians provide updates during war. Accessed 16 January 2024.

<https://www.dailymoth.com/blog/deaf-ukrainians-provide-updates-during-war>

²¹ Committee on the Rights of Persons with Disabilities' List of Issues Prior to Reporting to the European Union, CRPD/C/EU/QPR/2-3, paragraph 12.

²² CRPD Committee, CRPD/C/EU/CO/1, point 35.

²³ European Commission. 2024. *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Common Implementation Plan for the Pact on Migration and Asylum*. COM(2024) 251 final. Accessed January 27, 2025. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52024DC0251>.

with the representative organisations of persons with disabilities, including the European Union of the Deaf.

- 5.3. **Allocate funding to provide national-based disability-inclusive training** to staff, including social workers, interpreters, medical personnel, child protection officers, a.o. on how to address refugees and asylum seekers with disabilities, including deaf adults and children, in their work in the migration procedure.
 - 5.4. Ensure the European Commission's **five-year European Strategy on migration and asylum to be issued by the end of 2025 includes a disability cross-cutting perspective and provides targets** in achieving the safeguarding of the rights of refugees and asylum seekers with disabilities, including deaf people.
- 6. Efficiently delivering the strategy: Inclusion of deaf people and their representative organisations in the project development and implementation under the EU funding programmes**

While the current funding programmes of the European Union such as the Erasmus+ programme, the Citizenship, Equality, Rights and Values Programme (CERV), the European Social Fund, and the Horizon Europe foster engagement of citizens and participants with disabilities through disability-inclusive measures, some of the funded projects whose results impact the lives of deaf people do not include representative organisations of deaf people in the partnership and/or do not foresee their participation in the project development phases. Moreover, some funding programmes do not provide complementary funding for the inclusion costs, such as the provision of sign language interpretation and translation, in addition to the project funding (i.e. lump sum), reducing the capacity of the project partners to cover the costs of all the planned project activities.

Articles 4.3 and 33.3 CRPD combined with the CRPD General Comment N°7 on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention, require State Parties, including the European Union, to closely consult with and actively involve persons with disabilities through their representative organisations in decision-making processes on issues relating to them and in monitoring processes. In its 2021-2030 European Strategy on the Rights of Persons with Disabilities, the European Commission committed to foster a disability-inclusive perspective in different funding programmes such as the Erasmus+ (with financial support and other inclusion measures), the Citizenship, Equality, Rights and Values Programme (CERV) to implement the Strategy, and in the implementation of other financial instruments and programmes such as InvestEU and Horizon Europe.

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In prevision of the upcoming Multi-annual financial framework for 2028-2034, we urge the European Commission to:

- 6.1. Revise the inclusive measures in the funding programmes such as **granting criteria to ensure the full involvement of representative organisations of persons with disabilities in the project development and partnership** when the project addresses the target group of persons with disabilities;
- 6.2. Develop new funding measures in the funding programmes to **allocate complementary funding to cover inclusion costs**, including sign language interpretation and translation, in addition to the general financial envelope foreseen for projects.

7. Leading by example: Improve the accessibility of the EU institutions in both National Sign Languages (NSL) and International Sign (IS)

Even though the European Union strongly encourages the EU citizens' participation in the democratic life of the EU, deaf people are mostly left behind due to lack of accessibility of the information on the EU's political and legislative work in sign language, both national sign languages and International Sign.

The EUD applauds the sign language interpretation provided during the main disability-related events hosted by the EU institutions as well as the 2022 [State of the Union](#), the 2023 [State of the Union](#), the 2020-2024 [Messages and Statements](#) delivered by the President of the European Commission, Ms Ursula von der Leyen, and EU Commissioner for Equality Ms Helena Dalli; in addition to the [read-out of the weekly meetings](#) of the von der Leyen Commission (since 2020). However, the EUD deplores the lack of accessibility of the other EU institutions' main communication events and plenaries, such as the European Parliament Plenary sessions, the European Economic and Social Committee's Plenary Sessions, and the European Council's Press conferences. Moreover, the EUD notices that the Web Accessibility Action Plan 2022-2025 has shortcomings with regard to the accessibility of the European Commission's websites and mobile apps for deaf sign language users.

To increase deaf citizens' participation in the EU democratic life, the EUD recommends the European Commission to:

- 7.1. Revise the European Commission's Web Accessibility Action Plan 2022-2025 by consulting with European organisations of persons with disabilities, including the EUD, and ensure the **inclusion of deaf experts and representative organisations of deaf people** in the next stages of development of the **renewed Web Accessibility Action Plan** from 2025 onwards.

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7.2. Extend the European Commission’s commitment to render the information and communication accessible to EU deaf citizens by **ensuring the accessibility of the Citizens’ Engagement Platform, the Have Your Say on Europe, and similar initiatives both in International Sign and in National Sign Languages.**

7.3. Take the initiative to amend, with the European Parliament and the Council of the European Union, **the Communicating in Europe Partnership to include accessibility** of the communication on EU issues to deaf EU citizens.

8. Awareness, governance and measuring progress: Improve data collection and indicators to reflect intersecting identities and human rights-based approaches on deaf people

As of today, the European Union of the Deaf, and the National Associations of the Deaf are facing issues in conducting evidence-based policy actions to support the EU institutions in their legislative and regulatory work.

Due to a lack of comprehensive data on persons with disabilities disaggregated by disability in addition to other indicators, policymakers are unable to identify the most crucial issues faced by marginalised groups of persons with disabilities, such as deaf people, in some areas of life. Based on some national or subnational evidence collected in specific research initiatives in the field of employment, health and education, it is clear that deaf people constitute one of the most discriminated and marginalised groups of persons with disabilities. Moreover, any national-level data that does exist on deaf people does not consider their intersecting identities such as disabilities, gender, age, and BIPOC (Black, Indigenous, and People of Colour), both at the national and EU levels. In addition, any data that is collected is often characterised by a medical approach which, contrary to the human rights approach, reflects the percentage of hearing loss without establishing the full picture of their barriers and challenges in society.

The CRPD Committee recommended the European Union to “develop a human rights-based indicators system in cooperation with persons with disabilities and their representative organizations. The Committee also recommended for the collection of comparable comprehensive data system, with data disaggregated by gender, age, rural or urban population and impairment type²⁴”. While the European Commission committed to develop new disability indicators and develop a strategy for data collection, the main results, such as the EuroStat disability database, as of today are not complying yet with Article 31 of the UNCRPD, especially on the disaggregation of the data by disability type and with intersecting identities.

Indeed, while it addresses the intersection between disability and gender, the EuroStat

²⁴ CRPD Committee, CRPD/C/EU/CO/1, paragraph 73.

data only disaggregate persons with disabilities by level of activity limitation (“some”, “severe” and “some or severe”²⁵).

We therefore recommend the European Commission to:

8.1. **Expand the disability data indicators in the EuroStat database** to include disaggregation by disability type and with intersecting identities such as racial or ethnic origin, religion, languages, gender identity, disabilities, socio-economic status, sexual orientation, age and any other layers of identities.

8.2. Develop the **strategy for data collection, in close cooperation with representative organisations of persons with disabilities, including the European Union of the Deaf**, to ensure that the identified indicators are in line with the human rights perspective as enshrined in the UNCRPD, especially the linguistic and cultural minority perspective of deaf people.

Conclusion

The European Union of the Deaf (EUD) welcomes the European Commission's renewed commitment to ensuring the inclusion of persons with disabilities through the Strategy for the Rights of Persons with Disabilities 2021–2030. As the Commission prepares the Action Plan 2025-2030, the EUD strongly urges the integration of the proposed recommendations to uphold the rights of deaf people across the EU.

Recognising and including the 29 EU National Sign Languages (NSLs) as official EU languages is essential to achieving linguistic equality. Similarly, addressing systemic barriers to freedom of movement, employment, migration, and healthcare with a specific focus on sexual and reproductive health rights, will ensure deaf citizens can fully enjoy their rights. Furthermore, the Commission must lead by example through the provision of information and communication on the EU democratic processes in sign language, the inclusion of deaf people and their representative organisations in EU funding programmes and the development of disaggregated data indicators, with specific attention for the intersecting identities of deaf people.

Through continued collaboration with representative organisations of persons with disabilities, 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 rights for all, in line with the UN Convention on the Rights of Persons with Disabilities to achieve a Union of Equality.

²⁵ Eurostat Disability Employment gap by level of activity limitation and sex (source European Statistics of Income and Living Condition survey). Accessed 16 January 2025:
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