



**EUROPEAN UNION
OF THE DEAF**

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

**Feedback to the European Commission's public consultation
on the Gender Equality Strategy 2026–2030**

The European Union of the Deaf (EUD) is the sole supranational organisation representing deaf people at European level. Its membership consists of National Associations of the Deaf (NADs) from all 27 EU Member States, as well as from Iceland, Norway, Switzerland, the United Kingdom, and Ukraine. EUD's mandate is to establish and maintain structured dialogue with European institutions and policymakers, in close consultation and cooperation with its member NADs. EUD is a full member of the European Disability Forum (EDF) and its work is supported through the Citizens, Equality, Rights and Values (CERV) programme for the period 2022–2025.

One of EUD's core priorities is the promotion of gender equality. The organisation maintains a dedicated Working Group on Gender Equality and has implemented several initiatives in recent years to advance this agenda ([3rd European Deaf Women Forum](#), [Gender Report on Gender Based Violence](#), [Toolkit on Maximising the Effectiveness of the Women's Committee](#), a.o.). In this context, EUD welcomes the opportunity to contribute to the European Commission's public consultation on the forthcoming Gender Equality Strategy 2026–2030.

In May 2025, EUD consulted its member organisations, the National Associations of the Deaf (NADs) from 26 EU countries as well as from Norway, Iceland, Switzerland, and the United Kingdom regarding the current public consultation. EUD convened a workshop focused on gender equality, during which delegates from NADs were invited to share their views on the priorities of the European Commission's Roadmap for Women's Rights. Since these priorities are expected to form the basis of the new Gender Equality Strategy 2026–2030, the NADs identified gaps, shared concerns, and made recommendations for a strengthened Gender Equality Strategy.

The contribution presented below is grounded in the collective input received from EUD's national members. In addition to this consultation, EUD draws on a broader evidence base, including its past publications on gender equality and the outcomes of regional and European gatherings of deaf women, such as the European Deaf Women's Forums. The contribution presented below is thus grounded in both the structured input from EUD's national members and the lived experiences and perspectives of deaf women across Europe.

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1. Deaf women

Deaf women and girls who use national sign languages experience multiple and intersecting forms of discrimination based on their gender, disability, and cultural-linguistic identity. Unlike many other women with disabilities, deaf women belong simultaneously to the disability movement and to a cultural and linguistic minority that we call deaf communities. This dual affiliation places them in a unique position, where they are not only affected by disability-based discrimination and gender-based discrimination, but also by linguistic exclusion and stereotyping. Their access to rights, services, and opportunities is often hindered by the systemic lack of information and communication in national sign languages.

As a result, deaf women and girls face heightened risks of violence, poverty, social isolation, and unequal access to education, employment, and healthcare. These risks are particularly acute in times of health emergencies and humanitarian crises. Addressing their specific realities within gender equality policies requires a detailed, intersectional and inclusive approach that fully recognises the role of national sign language as a human right and ensures the mainstreaming of linguistic accessibility as a fundamental component of equality.

2. Intersectionality

Before addressing gender equality in policy and practice, the European Union must embed a robust intersectional approach. Intersectionality, first conceptualised by Professor Kimberlé Williams Crenshaw in 1989, is a dynamic framework that examines how different aspects of a person's identity, such as gender, race, disability, age, and sexual orientation, interact to create overlapping and interdependent systems of discrimination or disadvantage.

This approach rejects rigid categories of discrimination and instead focuses on how multiple identities intersect in complex ways. For example, a deaf Black or Indigenous woman may face discrimination based simultaneously on her gender, her racial or ethnic background, and her disability. Her experience of marginalisation cannot be fully understood or addressed through policies that treat each identity in isolation.

The European Parliament has already recognised this approach in its resolution of 6 July 2022 on intersectional discrimination in the European Union: the socio-economic situation of women of African, Middle Eastern, Latin-American and Asian descent (2021/2243(INI)). In this resolution, intersectionality is described as both a theoretical and practical tool for analysing how systems of power, including capitalism, colonialism, patriarchy, and racism, produce overlapping forms of exclusion, such as ableism, classism, homophobia, and multiple forms of racism. The resolution stresses that understanding these interactions is essential for the design of effective equality policies. The European Union of the Deaf endorses the intersectionality concept adopted by the European Parliament along with other legal and policy instruments as described in the [EUD Statement on Intersectionality](#).

The Amsterdam Treaty (1997/C 340/05), in line with the EU Charter of Fundamental Rights (Articles 21, 22, 23 and 26), mandated the EU to take action to combat discrimination on six grounds: sex, racial or ethnic origin, religion or belief, disability, age, and sexual orientation. Yet, despite this legal basis, the Gender Equality Strategy and the associated Roadmap for Women's Rights fail to fully integrate an intersectional lens. The Roadmap makes no specific reference to women with disabilities or to the multiple forms of discrimination that can arise at the

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intersections of identity. Only the accompanying “Declaration of Principles for a Gender Equality Society” briefly mentions intersectional discrimination across the five other grounds of the Amsterdam Treaty (racial or ethnic origin, religion or belief, disability, age and sexual orientation) but this is insufficient.

As outlined in our recent publication responding to the Roadmap, EUD stresses that this omission must be addressed. If the European Commission is to design inclusive and forward-looking gender policies, it must recognise and respond to the lived realities of women with intersecting identities, particularly those who are deaf and sign language users.

EUD calls upon the European Commission to mainstream intersectionality throughout the forthcoming Gender Equality Strategy 2026–2030. This should include the explicit recognition of women with disabilities, including deaf women, as a priority group, and ensure that all policy objectives, funding instruments, and monitoring mechanisms are designed to capture and respond to intersectional discrimination.

In line with our commitment to inclusive policy, EUD applies an intersectional lens as a cross-cutting principle throughout this contribution. This means that each thematic section considers how overlapping identities, particularly gender, disability and linguistic minority, shape the experiences of deaf women and other marginalised groups, and how these must be addressed in the future Gender Equality Strategy.

3. Roadmap for Women’s Rights key principles

While the Roadmap for the upcoming Gender Equality Strategy 2026–2030 outlines a number of important principles, EUD provided an initial analysis of the Roadmap in [its April 2025 publication](#). Additionally, it notes with concern the omission of several critical areas that must be addressed to ensure a comprehensive and inclusive gender equality framework.

A. The fight against discrimination, including multiple and intersectional discrimination, must be a core priority.

Although the Roadmap references broad principles of equality, it fails to place the fight against discrimination, particularly multiple and intersectional discrimination, at the forefront of its objectives, while this is a core feature of the EU Charter of Fundamental Rights. Women and girls with intersecting identities, including deaf women and women with disabilities, face compounded and structural barriers that are not adequately addressed when policies take a one-dimensional approach. A recommendation submitted by one of EUD’s National Associations of the Deaf highlights the urgent need to recognise the specific experiences of women with disabilities, ensuring that their rights and needs are addressed systematically across all proposed actions. This aligns with the [Concluding Observations of the CRPD Committee to the European Union](#), which call for strengthened cooperation between the European Institute for Gender Equality (EIGE) and national programmes in Member States to effectively address multiple and intersectional discrimination against women and girls with disabilities. Without explicit prioritisation of discrimination and its intersectional nature, the Strategy risks overlooking the most marginalised groups. EUD therefore urges the European Commission to establish this as a standalone priority, with actions and funding dedicated to combating discrimination in all its forms.

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B. The absence of a priority area on crisis response, including displacement, armed conflict, and humanitarian emergencies.

EUD strongly recommends the addition of a dedicated priority area addressing the gendered impact of crises, including war, forced displacement, migration, natural disasters, and public health emergencies. These contexts often exacerbate existing inequalities and disproportionately affect women and girls, particularly those with disabilities. Deaf women and girls face critical barriers to timely information and life-saving communication in national sign languages during such events, severely undermining their safety, dignity, and access to essential services. Emergency preparedness, crisis response, and resilience must include inclusive communication systems and disability-responsive protocols. Adding this priority would align with the mandate of the 2024-2029 Commissioner for Equality who is also in charge of preparedness and crisis management. The Gender Equality Strategy 2026-2030 must explicitly integrate these dimensions to ensure that no woman or girl is left behind during times of crisis.

C. Insufficient attention to sexual and reproductive health and rights (SRHR) as a distinct priority.

Although health is mentioned in the Roadmap, sexual and reproductive health and rights are not given the visibility or prominence they require. SRHR are not only fundamental rights but also central to achieving gender equality. The lack of targeted measures risks perpetuating harmful practices and neglecting the unique vulnerabilities of deaf women and women with disabilities in this domain. These include inaccessible health information, denial of informed consent, forced sterilisation, and harmful social norms around sexuality and reproduction.

During EUD's focus group consultations conducted in the framework of our [Gender Equality Report "Combatting Gender-based Violence and Discrimination against Deaf Women and Girls in the EU"](#), members reported alarming instances of intersectional discrimination faced by deaf women in healthcare settings, particularly in relation to family planning and reproductive rights. Deaf women are frequently stigmatised for wishing to become mothers, with medical professionals discouraging pregnancy due to fears of "passing on" deafness, reflecting deeply rooted ableist and medicalised views of deafness. Some were even pressured to consider abortion based on the likelihood of having a deaf child, a coercive practice that violates their right to bodily autonomy under Article 23 of the CRPD, combined with Article 9 EU Charter of Fundamental Rights. Additional concerns were raised about pressure on deaf parents to choose cochlear implants for their children without full, accessible information or consent, with families in some countries relocating to avoid such coercion. Participants also highlighted significant barriers to accessing adoption and IVF due to discriminatory attitudes about deaf women's ability to parent. These testimonies clearly demonstrate that deaf women continue to face harmful stereotypes, a lack of accessible communication, and violations of their SRHR which are issues that must be urgently addressed in the Gender Equality Strategy 2026–2030 through inclusive, rights-based, and accessible healthcare policy.

To ensure informed and targeted policy development, EUD supports the recommendation emerging from the [3rd European Deaf Women's Forum](#), held from 21–24 November 2024, to conduct a comprehensive European-level survey on the sexual and reproductive health and rights (SRHR) of deaf women and girls. This survey should aim to map both the barriers and opportunities experienced by deaf women leaders across all EU Member States, while also identifying best practices. Crucially, it must include a specific analysis of the situation of deaf

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refugee and migrant women, who face intersecting challenges linked to gender, disability, language, and legal status.

EUD recommends that SRHR be clearly established as a standalone priority in the Strategy, with a commitment to map the situation of access of women and girls with disabilities to SRHR, the establishment of accessible services, the fight against harmful practices, and tailored outreach to women and girls with disabilities, including those who are deaf.

4. Disaggregated data collection

Due to the persistent lack of disaggregated data, it remains nearly impossible to measure and track the barriers faced by women with disabilities—particularly deaf women who use national sign languages. Without reliable, disaggregated, and accessible data, policymakers cannot fully understand the extent of the inequalities these women face, nor design effective strategies to address them. It is essential that data be disaggregated not only by gender and disability, but also by other intersecting identities such as age, ethnicity, race, LGBTIQ+ identity, and socio-economic status.

As in the previous Gender Equality Strategy 2020–2025, the systematic collection of data must remain a central action across all pillars of the upcoming Strategy. However, the new Strategy must take a more ambitious and inclusive approach. Data must go beyond basic figures to include qualitative methods, such as focus groups, in-depth interviews, and narrative-based research. These approaches are essential to reflect the lived realities of women and girls with intersecting identities, including deaf women and girls. They provide the nuance and depth necessary to uncover structural discrimination, hidden barriers, and gaps in service provision. Just as important is the accessibility of data collection tools. Surveys coordinated by Eurostat and implemented through National Statistical Offices must be fully accessible to all women, including deaf women who communicate through national sign languages. Currently, most data collection instruments lack accessible formats—excluding deaf women from representation in datasets and, by extension, from policy development. EUD recommends the adoption of varied and accessible methodologies—such as sign language-interpreted focus groups, video responses in national sign languages, and simplified written formats—to ensure that data gathering is inclusive, rights-based, and reflective of diverse experiences.

This is confirmed and recommended by the CRPD Committee, in its Concluding Observations to the European Union as follows:

- Improve disaggregated data collection on the participation of women and girls with disabilities in political, economic and social life, and on inclusion and intersectionality in EU external action in partner countries (point 21(d)).
- Closely consult and actively involve representative organisations of persons with disabilities, including those representing deaf women, in the development and implementation of inclusive data collection systems (point 21 (d)).
- Disaggregate data on persons with disabilities by LGBTIQ+ identity, gender, race, ethnicity, standard of living, and age (point 73(c)).

The European Commission must take the lead in transforming current data collection systems to reflect diversity, guarantee accessibility, and be shaped by the active involvement of those most affected. Only then can the Gender Equality Strategy 2026–2030 deliver on its promise to be inclusive, intersectional, and truly evidence-based.

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5. Gender Based Violence

Deaf women and girls across the EU continue to face systemic and structural barriers in nearly all areas of life, with heightened vulnerability to gender-based violence (GBV) and intersectional discrimination linked to their gender, disability, and linguistic identity. Deaf women face heightened risks, not only because of their gender and disability, but also due to their reliance on national sign languages, which are often excluded from official communication, services, and emergency responses. This lack of accessibility extends to vital GBV support structures: helplines are voice-only, police officers lack deaf awareness training, and awareness campaigns fail to reach deaf communities due to the absence of sign language translation. In some EU Member States, shocking violations such as forced sterilisation of women with disabilities, including deaf women, are still legally permitted—highlighting a grave failure of protection under both human rights and EU law.

As part of our [Gender Equality Report “Combating Gender-based Violence and Discrimination against Deaf Women and Girls in the EU”](#) and during the May 2025 consultation with EUD’s National Associations of the Deaf (NADs), our member organisations voiced deep concern over the growing number of deaf women experiencing GBV—many of whom are unaware of their rights or what constitutes abuse due to a lack of accessible information. The trauma of violence is often compounded by social isolation, and for deaf women—already marginalised—it becomes even harder to seek help. NADs reported an urgent need for awareness-raising campaigns in national sign languages as well as within the deaf communities and targeted support groups fully accessible in national sign languages. Adequate funding must be allocated to National Associations of the Deaf (NADs) and voluntary organisations, which play a vital role in supporting deaf women affected by gender-based violence, yet often operate with limited resources, few staff, and face significant barriers in ensuring accessible services.

To address these urgent challenges, EUD makes the following key recommendations:

- Collect reliable, disaggregated data on deaf women and girls in relation to GBV and discrimination, including qualitative evidence.
- Ensure meaningful involvement of deaf women and their representative organisations in the review and design of GBV policies, services, and emergency systems.
- Provide systemic training for service providers, including police, medical personnel, and shelter staff on how to work with deaf women victims of GBV.
- Make all GBV-related services and campaigns accessible in national sign languages, including hotlines, awareness materials, and reporting procedures.
- Promote the adoption and enforcement of the EU Anti-Discrimination Directive, to protect deaf women from discrimination based on gender, disability, and language use.
- Criminalise forced sterilisation, and genital mutilation, ensuring such practices are outlawed nationally.
- Develop an EU-level website providing accessible information on support services, available sign language interpreters, and rights for deaf women affected by GBV.
- Implement deaf-awareness training for professionals working in protection and support services.

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6. Gender equality is not a binary approach

A key concern raised during EUD's consultation with its members in May 2025 is the persistent binary framing of gender in EU policy instruments, including the current Gender Equality Strategy 2020–2025, the Roadmap for Women's Rights, and the European Care Strategy. These frameworks predominantly refer to “men” and “women,” thus failing to meaningfully include gender-diverse persons, such as those who identify as non-binary, transgender, or outside the traditional gender binary. This exclusion creates a clear gap in the EU's gender equality framework, as individuals who do not identify strictly as male or female are often left without recognition, targeted protections, or adequate representation.

While the EU's LGBTIQ Equality Strategy 2020–2025 does address certain aspects of gender identity, the strict division between it and the Gender Equality Strategy has led to fragmented protection and a lack of coherent policy for non-binary and gender-diverse individuals, particularly when it comes to gender-based discrimination and access to gender-sensitive services.

EUD urges the European Commission to adopt a more inclusive and intersectional approach to gender in the 2026–2030 Strategy. This means going beyond a binary understanding of gender and explicitly recognising the rights, experiences, and barriers faced by non-binary, transgender, and gender-diverse persons, including those who are deaf or have disabilities. Ensuring their inclusion in the gender equality framework is essential to truly uphold the EU's commitment to leaving no one behind.