EUROPEAN UNION OF THE DEAF

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

EUD Report "Beyond the data: Recognising the intersectional identities of European deaf communities in official statistics"

1. Introduction

Quality, reliable data is a critical step towards the adoption of meaningful policies on deaf people and their national sign languages (NSLs), including its officialisation as official languages of the European Union[1]. Without accurate figures on the number of deaf people and their access to education, employment, and public services, as well as their barriers to full societal participation[2], EU institutions and Member States lack the necessary evidence to enact meaningful change. This call had been echoed by the 2025 CRPD Committee in its Concluding Observations to the EU[3].

At present, deaf people remain largely invisible in official datasets at both the EU and national levels. The importance of quality and accurate data collection on deaf people cannot be understated. With approximately one million deaf people in the EU, the EU deaf community represents 0,05% of the European population[4]. However, there is little to no official data on deaf people at the EU and national levels, preventing meaningful policies and projects from being undertaken. When they are counted, it is often through a narrow medical model of disability that reduces them to categories of hearing loss, overlooking their linguistic identity and cultural participation. This absence of accurate data hinders the design of policies that could foster the protection, promotion, and official recognition of NSLs in the EU[5]. Recognition without evidence risks being symbolic rather than transformative.

The requirement for disaggregated data is explicitly recognised in international human rights frameworks. Article 31 of the United Nations Convention on the Rights of Persons with Disabilities

[1] Wheatley, M., & Pabsch, A. (2012). Sign language legislation in the European Union. European Union of the Deaf.
[2] Manning, V., Murray, J. J., & Bloxs, A. (2022). Linguistic human rights in the work of the World Federation of the Deaf. In The handbook of linguistic human rights. John Wiley & Sons.
[3] Committee on the Rights of Persons with Disabilities. (2025). Concluding observations on the second and third periodic reports of the European Union (CRPD/C/EU/CO/2-3). Available at : https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FEU%2F2-3&Lang=en. Consulted on 24 November 2025. Point 73c.
[4] European Union of the Deaf Policy Recommendations on the Establishment of Targets for the Employment of Deaf People. Published on 16 November 2023, available at: https://www.eud.eu/eud-policy-recommendations-on-the-establishing-of-targets-for-the-employment-of-deaf-people/. Consulted on 24 November 2025.b
[5] European Union of the Deaf Findings and Results of the Survey on the Available Data Related to Deaf People at National Level. Published on 3 July 2023. Available at https://eud.eu/findings-and-results-of-the-survey-on-the-available-data-related-to-deaf-people-at-national-level/. Consulted on 24 November 2025.

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(UNCRPD) obliges States Parties, including the European Union, to collect appropriate, disaggregated data to identify and address barriers to the exercise of rights. Yet disaggregation cannot be limited to disability alone. Deaf people are not a homogeneous group: they live at the intersections of gender, age, ethnicity, disability, migration, sexual orientation, socio-economic status, and other identities. The EUD Statement on Intersectionality highlights that only by capturing these multiple dimensions can policies respond to the full diversity of deaf communities in Europe[6].

2. Methodology

The design of the present report uses a combination of desk research and qualitative data collected during a focus group meeting with 16 National Associations of the Deaf from 15 European countries that took place on 23 April 2024. This focus group meeting, titled "Is it time for an EUD Census?", was the opportunity for the European Union of the Deaf to seize the momentum of its 40th anniversary to build a consensus among its members on the necessity of collective transnational actions towards collecting data on deaf people and their interactions with various areas of society.

In line with its statement on intersectionality, the EUD believes that data should take into account the dual identity of deaf communities as persons with disabilities and members of cultural and linguistic minorities, while being disaggregated by intersecting identities and experiences comprising of their racial or ethnic origin, languages, gender identity, religion, disabilities, socio-economic status, sexual orientation, age and any other layers of identities.

The data will be collected and used at the local, national and regional levels by the EU, its Member States, Civil Society Organisations and any relevant stakeholders. This lack of quality and accurate data prevents evidence-based policy documents and project proposals from being undertaken as was highlighted in the 2023 EUD report on data collection on deaf people[7].

In 2023, the EUD released its Policy Recommendations on the Establishment of Targets on the Employment of Deaf People[8], which highlighted the lack of disaggregated data on deaf people in their access to the open and inclusive labour market in the EU. The present report aims to provide a comprehensive approach to data collection, meaningfully benefitting both deaf communities and their governments by taking stock of the collected data during the 2024 focus group meeting EUD organised with its members. Furthermore, the content of the present report is a policy-adjusted version of the chapter "Mapping Sign Language Peoples: The urgent need for comprehensive data collection in the European Union"[9] from the forthcoming EUD book "From recognition to officialisation – An European evolution of sign language rights.

The present report aims to highlight the necessity of robust data collection extending beyond the disability lens to encompass the cultural and linguistic dimensions of deaf communities. This part is

[6] European Union of the Deaf Statement on Intersectionality. Published on 7 September 2024. Available at: https://eud.eu/statement-on-intersectionality-3/. Consulted on 24 November 2025.
[7] EUD Findings and Results of the Survey on the Available Data Related to Deaf People at National Level. *Op. cit.*
[8] EUD Policy Recommendations on the Establishment of Targets for the Employment of Deaf People. *Op. cit.*
[9] Bloxs, A., de Wit, M. (2025). Mapping Sign Language Peoples: The urgent need for comprehensive data collection in the European Union. In A. Bloxs (Ed.), From recognition to officialisation: A European evolution of sign language rights. European Union of the Deaf.

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highlighted in the "Conceptual and legal framework for data collection" part. Subsequently, the paper presents the current state of data collection in the EU for deaf people, providing a European data collection snapshot. The chapter then presents the main findings and discussion outlined in the 2024 focus group meeting, indicating the way forward, which will be presented in the next section of the report. Finally, the report will provide recommendations tailored to EU institutions, national governments, and the National Associations of the Deaf. These recommendations aim to tackle the main barriers in safeguarding robust data collection for deaf people disaggregated by their intersecting identities and lived realities.

3. Conceptual and legal framework for data collection

The collection of quality and disaggregated data on deaf people and their national sign languages is not simply a technical or statistical exercise but an international human rights obligation. Quality and reliable data disaggregated by disability and their intersectional identities and experiences are crucial to formulate and implement policies giving effect to these international legal obligations.

Data disaggregation by disability means that statistical information must not treat persons with disabilities as a single, undifferentiated category but instead break down data according to the specific barriers experienced by different groups of persons with disabilities[10]. For Deaf people, this implies collecting information not only on the presence of hearing loss but also on their national sign languages, access to professional sign language interpreters, availability of education in their national sign language, and participation in public life.

At the European level, this duty has been reaffirmed in the Disability Rights Strategy 2021–2030, which highlights data collection as a cornerstone for monitoring progress, designing evidence-based policies, and ensuring accountability of Member States in fulfilling their CRPD commitments[11].

The importance of data collection extends beyond the disability framework and is equally rooted in minority and language rights frameworks. The following provisions do not specifically refer to data collection but are crucial to encapsulate the cultural and linguistic rights of Deaf people. It starts with Article 27 of the International Covenant on Civil and Political Rights (ICCPR), which safeguards the rights of persons belonging to linguistic, cultural, and religious minorities to enjoy their culture and use their language. For Deaf people, this translates into the right to use their national sign language[12]. Similarly, the United Nations Convention on the Rights of the Child (CRC), in its Article 30, guarantees children belonging to linguistic minorities the right not to be denied the use of their own language. This provision directly applies to deaf children, who should not be deprived of the right to access education in and through their national sign language. The UN Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities further strengthens these obligations, highlighting the duty of States Parties to create conditions enabling persons belonging to minorities to express and develop

[10] Abualghaib, O., Groce, N., Simeu, N., Carew, M. T., & Mont, D. (2019). Making visible the invisible: Why disability-disaggregated data is vital to "leave no-one behind". Sustainability, 11(11), 3091. https://doi.org/10.3390/su11113091

[11] European Commission. Strategy for the Rights of Persons with Disabilities 2021-2030. Available at: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/disability/union-equality-strategy-rights-persons-disabilities-2021-2030_en. Consulted on 24 November 2025.

[12] De Meulder, M., & Murray, J. (2017). Buttering their bread on both sides? The recognition of sign languages and the aspirations of deaf communities. Language Problems & Language Planning, 41(2), 136–158. https://doi.org/10.1075/lplp.41.2.04dem

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their culture and language. These frameworks, when read together, create a robust normative basis for recognising the role of data in safeguarding minority linguistic rights. Without reliable data on the use, transmission, and accessibility of national sign languages, States Parties cannot meaningfully implement these provisions.

At the level of the European Union, the obligation to ensure equality and linguistic diversity is grounded in its foundational legal instruments. The Charter of Fundamental Rights of the European Union explicitly prohibits discrimination (Article 21), safeguards the rights of persons with disabilities to benefit from measures ensuring their independence and social and occupational integration (Article 26), and reaffirms the protection of cultural, religious, and linguistic diversity (Article 22). Furthermore, Article 3 of the Treaty on European Union (TEU) enshrines the EU's objective to respect its rich cultural and linguistic diversity while promoting equality. Eurostat, as the statistical office of the EU, plays a central role in operationalising these legal obligations. Although it has recently taken steps forward with the creation of a thematic page on disability, deaf people, including Deaf people remain invisible in its datasets[13]. This oversight highlights the gap between the EU's legal commitments and the current state of data collection. A future framework must therefore ensure that Eurostat and national statistical offices develop methodologies capturing the realities of Deaf people, with a particular focus on the use of national sign languages.

The necessity of such disaggregated data is heightened when considering the specific dual identity of deaf communities as both persons with disabilities and member of cultural and linguistic minorities[14]. Thus, collected data should take into consideration this dual identity since it has significant consequences in law and policies. Disability-focused data, when unaccompanied by linguistic and cultural dimensions, risks reducing deaf people to a homogeneous group within disability statistics, overlooking the unique linguistic human rights attached to NSLs. Conversely, data limited to linguistic minorities fails to account for the accessibility barriers and disability-related discrimination that deaf people face in their daily lives. Comprehensive data collection addressing both perspectives is therefore indispensable. It ensures that policies do not perpetuate the Deaf Duality Paradox, but instead embrace the holistic dual identity of Deaf people as both persons with disabilities and members of cultural and linguistic minorities.

Finally, data collection must also integrate an intersectional approach. Deaf people are not a monolithic group but individuals situated at the intersection of multiple identities, including gender, age, sexual orientation, racial or ethnic background, religion, socio-economic status, and other characteristics[15]. The EUD Statement on Intersectionality (2024) stresses the necessity of recognising and addressing these intersecting identities to ensure equality and non-discrimination in practice. Disaggregated data that fails to capture these layers risks obscuring the compounded forms of exclusion faced by deaf people who belong to multiple marginalised groups. Incorporating intersectional data is thus crucial to provide an accurate picture of the realities of Deaf people in Europe and to ensure that advocacy for sign language officialisation does not benefit only some within the community but truly reflects its diversity.

[13] Eurostat Thematic Section on Disability. Available at: https://ec.europa.eu/eurostat/web/disability/overview. Accessed on 24 November 2025.
[14] De Meulder, M., & Murray, J. (2017). *Op. cit.*
[15] Emery, S. D., & Iyer, S. (2022). Deaf migration through an intersectionality lens. Disability & Society, 37(1), 89–110. https://doi.org/10.1080/09687599.2021.1916890

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4. The current data gap on Deaf people: State of play in the EU and the EUD Census

The importance of accurate and reliable data on deaf signers has long been recognised within the European deaf community[16]. Yet, the state of play across the European Union reveals a fragmented and insufficient landscape, where data collection remains inconsistent, definitions are unclear, and deaf people are systematically underrepresented and misrepresented in both disability statistics and language rights monitoring. This section highlights the current challenges, recent developments, and the limitations that still prevent data from becoming a robust foundation for advocacy towards the officialisation of national sign languages (NSLs) at the EU level.

In 2023, the EUD released a landmark report on data collection on deaf people in the EU[17]. The report underlined the acute lack of reliable and disaggregated data both at national and EU levels. It stressed that many EU Member States do not collect data specifically on deaf people, let alone on their access to sign language, education, or employment. Where data exists, it is often incomplete, outdated, or embedded within broader disability categories that erase the distinct realities of deaf communities.

The report further highlighted that this lack of robust data directly undermines evidence-based policymaking. Without reliable figures, both EU institutions and Member States struggle to design or evaluate targeted measures ensuring the inclusion of Deaf people. For example, employment strategies are hindered by the absence of reliable statistics on deaf workers in the open labour market[18], while education policies are affected by the lack of information on the number of deaf children accessing bilingual education in their national sign language[19]. Without corrective measures, the absence of data will perpetuate structural inequalities and hinder progress towards the human rights of deaf people.

What the 2023 EUD report on data collection failed to encapsulate, which was revealed in the 2024 EUD meeting on developing an European-wide census, was the existing divergence in national definition of "deaf people" and "national sign language users." In several Member States, data collection continues to be driven by a medical model of disability, whereby individuals are categorised according to their audiological status, such as the percentage of hearing loss. This approach not only fails to reflect the cultural and linguistic identity of Deaf people but also excludes many who may not be medically classified as "deaf" as their hearing loss is not severe enough, but who nonetheless identify as part of the deaf community and have a national sign language as their primary means of communication[20].

By contrast, other states, such as Finland, adopt a linguistic or cultural approach, framing data around "sign language signers",[21] in which they also include hearing signers. While this recognises the linguistic identity of deaf people, it introduces another limitation: some Deaf people acquire their NSL later in life due to the fact that 95% of deaf children have hearing parents[22]. Consequently, it is problematic to measure the number of deaf people exclusively through a "native language" lens. This is reinforced by

[16] EUD Findings and Results of the Survey on the Available Data Related to Deaf People at National Level. *Op. cit.*
[17] EUD Findings and Results of the Survey on the Available Data Related to Deaf People at National Level. *Op. cit.*
[18] European Union of the Deaf Policy Recommendations on the Establishment of Targets for the Employment of Deaf People. *Op. cit.*
[19] *Ibid*
[20] De Meulder, M. (2014). The UNCRPD and sign language peoples. In A. Pabsch (Ed.), UNCRPD implementation in Europe – A Deaf perspective. Article 29: Participation in political and public life (pp. 12–28). European Union of the Deaf.
[21] Translated from the Finnish word 'Viittomakieliset'
[22] Hall, M. L., Hall, W. C., & Caselli, N. K. (2019). Deaf children need language, not (just) speech. First Language, 39(4), 367–395. https://doi.org/10.1177/0142723719834102

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the many cases of linguistic deprivation[23] and the lack of adequate policies fostering the learning of sign languages by families of deaf children[24]. Moreover, the inclusion of hearing signers, such as children of deaf adults (CODAs), educators, or interpreters, complicates the distinction between linguistic community membership and the disability-related lived experience of deaf people. The disparity between medical and linguistic framing prevents the collection and comparison of reliable data of deaf people across the EU.

Despite these challenges, recent years have seen some positive developments at both EU and national levels. At the EU level, Eurostat has launched a thematic page on disability[25], providing consolidated statistical information on persons with disabilities across the European Union, which was critically missing. While this step has improved visibility for disability-related issues, it remains limited in scope as it does not yet provide disaggregated data on deaf signers. Nevertheless, this development demonstrates that the EU recognises the importance of targeted disability data collection and may provide an entry point for further inclusion of indicators specifically focusing on deaf people, as called by the EUD in its 2023 policy recommendations on the establishment of targets for the employment of deaf people[26]. Although the latter policy recommendation focuses on the area of employment, the position of the EUD is to extend these targets to all spheres of society.

At the national level, censuses conducted in some Member States have begun to include references to sign language. The United Kingdom's decennial census has included questions on British Sign Language (BSL), although concerns remain regarding the accuracy of these figures, particularly in capturing late learners or people who sign but did not self-identify to have BSL as their primary language. In addition, how the question on BSL was posed, BSL in the home or their preferred main language, can be understood differently by a BSL signer. Because this question was posed differently in 2011 than in 2021, it is assumed that this affected the final figures. There were also concerns expressed about undercounting such as of deaf children or deaf elderly who may not complete the census forms themselves[27][28]

Similarly, Ireland has attempted to introduce data on Irish Sign Language (ISL), yet the figures produced were contested by the Irish Deaf Society (IDS), Ireland's National Association of the Deaf, due to perceived undercounting[29]. According to the IDS, similarly to the BDA findings, the undercounting is caused by the confusing formulation of the questions in the census. For example, the question if Irish Sign Language is used in the home might create a wrong representation, as deaf people might not sign

[23] World Federation of the Deaf Position Paper on Access to National Sign Languages as a Health Need. Published in April 2022. Available at: https://wfdeaf.org/resources/position-paper-on-access-to-national-sign-languages-as-a-health-need/. Consulted on 24 November 2025.
[24] World Federation of the Deaf Position Paper on the Rights to Sign Language of Deaf Families/Carers of Deaf Children. Published in May 2024. Available on: https://wfdeaf.org/resources/position-paper-on-the-right-to-sign-language-for-families-carers-of-deaf-children/. Accessed on 24 November 2025.
[25] Eurostat Thematic Section on Disability. *Op. cit.*
[26] European Union of the Deaf Policy Recommendations on the Establishment of Targets for the Employment of Deaf People. *Op. cit.*
[27] Turner, G. H. (2020). How many people use British Sign Language? Scotland's 2011 census and the demographic politics of disability and linguistic identity. In Language on the move across domains and communities: Selected papers from the 12th Triennial Forum for Research on the Languages of Scotland and Ulster, Glasgow 2018 (pp. 37–70).
[28] British Deaf Association , Work remains to be done on census figures for BSL. Published on 30 November 2022. Available at: https://bda.org.uk/bsl-census-figures-2022/. Consulted on 24 November 2025.
[29] Irish Deaf Society. Census 2022 summary results. Published on 31 May 2023. Available at: https://www.irishdeafsociety.ie/census-2022-summary-results/. Consulted on 24 November 2025.

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at home but do favour Irish Sign Language in their communication.

In Finland the authorities use a register-based census system and not a questionnaire format as in the UK or Ireland[30]. The advantages are that Finland uses administrative registries and therefore has real time updates and does not have to wait as is the case with the traditional census format. However, there are disadvantages such as that the system does not allow self-identification as Deaf people. Deaf people might also be reluctant to register in a disability database, and the definition across registers of what deaf signers might be different. Sweden also uses a similar disability related register system as in Finland. In Sweden deaf people are registered as 'patients'[31] and no specific information is collected in the registries on Swedish Sign Language.

In the Netherlands the advisory committee on Nederlandse Gebarentaal (NGT, Dutch Sign Language) has discussed the need to include a question on NGT in the national census. However, no progress has been made so far and further research is needed (personal correspondence with Joni Oyserman, chair or the NGT Advisory committee).

In summary, to date the majority of the countries do not include any information about sign language and deaf people in their national census. The countries that do, e.g. Ireland and the UK, need to further adjust the current formulation to ensure those who have a signed language as their means of communication, are included in the census results.

5. Conclusion and path forwards

The ratification of the CRPD by both the EU and its Member States created a legal obligation to proceed with comprehensive data collection. Whereas progress has been made in the last decade with the launch of the Eurostat disability database several limitations persist. The 2024 EUD focus group meeting on a potential EUD Census highlighted several limitations in collecting robust data on deaf people at the EU level.

The first limitation pertains to underrepresentation. Many deaf people remain invisible in official statistics because they are categorised under generic disability labels or because survey methodologies are inaccessible and fail to capture the full spectrum of the intersectional identities of deaf communities. Existing data rarely distinguishes between deaf people on the basis of intersecting identities such as gender, age, ethnicity, disability, socio-economic status, or migration background. The absence of such disaggregated data obscures the specific barriers faced by marginalised communities within deaf communities. For example, deaf women may face compounded discrimination in employment, while deaf migrants may struggle with both linguistic and legal barriers to accessing services. The EUD Statement on Intersectionality[32] emphasised precisely this point: only by recognising, respecting and applying the multiple intersecting identities of deaf people can policies fully address their requirements. This is the case of Eurostat, which disaggregates their disability database by functional limitations, which are, in turn, disaggregated by sex, age, educational attainment level, degree of urbanisation, and activity limitation (Eurostat, n.a.). The current data set collected at the EU level fails to capture the lived realities of the European deaf community in all its

[30] Statistics Finland. Surveys and data collections. Available at: https://stat.fi/en/surveys. Consulted on 24 November 2025
[31] Holmström, I., & Bagga-Gupta, S. (2021). Patient or citizen? Participation and accessibility for deaf and hard-of-hearing people in the context of interpretation in Sweden. Scandinavian Journal of Disability Research, 23(1), 209–223. https://doi.org/10.16993/sjdr.733
[32] European Union of the Deaf Statement on Intersectionality. *Op. cit.*

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diversity.

A second limitation lies in the lack of national surveys offered in national sign languages, which reinforces this exclusion, as many deaf people cannot participate effectively in data collection exercises. Furthermore, during the EUD Census meeting, participants reported that in several countries, national censuses are exclusively conducted through phone calls without any existing accessible alternatives. This practice places the realities of deaf communities at the margins of national statistics.

A third limitation concerns inaccuracy. Definitions based on medical criteria often erase the linguistic and cultural dimensions of deaf communities, while definitions based on language use risk excluding late learners or overcounting by including hearing signers. These methodological shortcomings produce distorted figures that do not reflect the lived realities of deaf people in Europe.

Finally, there are risks linked to privacy and compliance with data protection frameworks such as the General Data Protection Regulation (GDPR), which are often used as a safeguard by national statistical authorities to refuse to disclose the number of Deaf people in an existing county. However, we believe this position should be nuanced. Article 9(1) GDPR explicitly forbids the processing of data concerning health to determine a specific category of population. However, there are exceptions to this rule. Article 9(2)(g) foresees an exception to the rule for reasons of substantial public interest to provide suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. When it comes to Deaf people and NSLs, the latter legal provision is to be interpreted as allowing the disclosure of data on the number of Deaf people to cater policies and legislation tackling the causes of their marginalisation. Thus, Article 9(1) GDPR should not be used as a justification by EU Member States as a reason not to disclose the collected data, which has the adverse consequence of maintaining the status quo in marginalising deaf communities in their societies.

At the national level, the examples of the United Kingdom, Ireland, Finland, and Sweden illustrate how varying methodologies and approaches continue to shape the quality and reliability of data collection on NSLs signers. In the United Kingdom and Ireland, despite positive steps to include questions on BSL and ISL respectively, concerns persist regarding the clarity of the questions and the accuracy of the resulting figures. The formulation of census questions, whether sign language is used at home or is considered the main language, has led to significant variations and undercounting, particularly of deaf children, elderly people, or those who did not complete census forms independently. Similarly, in Finland and Sweden, the use of register-based systems excludes self-identification as a deaf signer and fails to account for linguistic identity. While these systems allow for more frequent updates, they risk reinforcing medicalised understandings of deafness. The case of the longitudinal study Sign Language Interpreting in Europe further demonstrates the transformative potential of systematic data collection. The study has become a key instrument in documenting the evolution of professional NSLs interpretation. Its comparative data has enabled both national associations of the deaf and national associations of sign language interpreters to advocate for the better recognition and status of NSLs interpreters.

Moving forward, deaf communities, both at the regional and national levels, have a lot to gain in coordinating their efforts towards establishing robust data collection strategies encompassing both their disability, and linguistic and cultural identities. Furthermore, these data should be disaggregated according to the intersectional identities of Deaf people. The lessons learnt for the EUD Census focus group meeting include the necessity of establishing a clear standardised methodology and scope of

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research, as well as standardised research questions. This would allow the collection of data, initially at the national level, that will become transnational and European. This bottom-up approach will counterbalance the existing top-down approach to data collection that is currently put in place by Eurostat. The ultimate goal of this exercise is to ease the advocacy work towards proceeding with the officialisation of NSLs at both the national level and at the European Union's level.

6. Recommendations

The follow section established tailored recommendations destined to EU institutions, national governments and National Associations of the Deaf. The purpose of these recommendations is to bring guidance to relevant stakeholders on how to tackle the lack of data disaggregated by intersecting identitied of deaf people as well as reflecting their lived realities.

EU-level recommendations

- Develop and enforce EU-wide standards for accessible data collection methodologies, ensuring that all EU-level surveys and statistical tools are available in national sign languages.
- Require Eurostat and other EU data bodies to collect data that reflects the linguistic and cultural identities of deaf people, not only functional limitations.
- Ensure that EU-level datasets are fully disaggregated to capture intersectional identities such as gender, age, ethnicity, socio-economic status, disability, and migration background.
- Encourage Member States to apply the GDPR Article 9(2)(g) exception to permit the disclosure of data on the number of deaf people where this supports substantial public interest and the protection of fundamental rights.
- Promote a bottom-up data collection approach that complements the current top-down Eurostat methodology, including support for harmonised research questions and methodologies across Member States.
- Use improved data to advance policies and legislation supporting the officialisation of NSLs at the EU level.

National-level recommendations

- Provide fully accessible census and survey tools in NSLs, avoiding reliance on methods such as telephone-only interviews.
- Ensure that census questions on sign language are clearly formulated and do not rely solely on concepts such as "language used at home" or "main language", which lead to undercounting.
- Disaggregate national datasets to reflect intersectional identities within deaf communities.
- Avoid exclusively medicalised criteria in official registers; integrate linguistic and cultural identity into national data systems.
- Apply GDPR Article 9(2)(g) appropriately to permit the disclosure of data on the number of deaf people, rather than using Article 9(1) as a justification for withholding information.

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- Establish standardised national methodologies and research questions that can contribute reliably to transnational and European data frameworks.

Recommendations for National Associations of the Deaf

- Coordinate efforts across regions and countries to develop robust data collection strategies that reflect the lived realities of communities, encompassing disability, linguistic and cultural perspectives.
- Advocate for national statistical authorities to provide fully accessible survey and census processes in NSLs.
- Work with communities to highlight the importance of disaggregated data that reflects diverse intersectional identities within deaf communities.
- Encourage the adoption of standardised research questions and methodologies that can feed into European-level data collection.
- Use evidence from systematic studies, such as research on sign language interpreting, to strengthen advocacy for improved recognition and status of national sign languages and the professionals who work with them.
- Support a bottom-up approach to data collection that can ultimately strengthen advocacy for the officialisation of national sign languages at both national and EU levels.

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