



Joint Submission to the CRPD Committee on the Draft Guidelines on Addressing Multiple and Intersectional Forms of Discrimination Against Women and Girls with Disabilities - Focus on deaf women and girls

Submitted by:

The European Union of the Deaf and the World Federation of the Deaf

Executive Summary:

This joint submission by the European Union of the Deaf (EUD) and the World Federation of the Deaf (WFD) highlights the systemic and intersectional discrimination experienced by deaf women and girls globally. Drawing on legal analysis, research findings, and good practices, the submission identifies key areas of exclusion (such as access to justice, healthcare, education, and political participation), critiques the inadequacy of current legal and policy frameworks, and offers recommendations for ensuring full inclusion. Deaf women and girls face compounded discrimination based on gender, disability, language, and additional identities such as ethnicity or migration status. Their rights must be recognised through inclusive data systems, sign language access, and meaningful participation in policymaking.

I. Introduction

The European Union of the Deaf (EUD) and the World Federation of the Deaf (WFD) welcome the opportunity to provide inputs on the draft guidelines on addressing multiple and intersectional forms of discrimination against women and girls with disabilities to the Committee on the Rights of Persons with Disabilities (CRPD Committee). This joint submission focuses on deaf women and girls facing compounded intersectional discrimination based on gender, disability, language and other identity factors such as race, indigeneity, migration status and sexual orientation. Our contribution draws from grassroots knowledge, community-led data, legal analysis and examples of good practices.

The European Union of the Deaf (EUD) is the only supranational organisation representing Deaf people at the European level and its membership is composed of National Associations of the Deaf from all of the 27 EU Member States, in addition to Iceland, Norway, Switzerland and the United Kingdom. EUD maintains EU-level dialogue with institutions in cooperation with its member NADs. It is a full member of the European Disability Forum, a Regional Co-operating Member of the WFD, and holds consultative status with the UN and participatory status with the Council of Europe.

The WFD is an international non-governmental organisation that represents and promotes approximately 70 million deaf people's human rights worldwide. The WFD is a federation of deaf organisations from 139 nations; its mission is to promote the human rights of deaf people and full, quality and equal access to all spheres of life, including self-determination, sign language, education, employment and community life. WFD has a consultative status in the United Nations and is a founding member of the International Disability Alliance (IDA).

II. General Observations

By “deaf women and girls”, in this contribution, we refer both to the diversity recognised by the CRPD Committee in its General Comment No. 3, which highlights that women and girls with disabilities are not a homogeneous group and may include lesbian, bisexual, transgender, and intersex persons¹, and to the EUD and WFD understanding of deaf people as members of a linguistic and cultural minority through the use of national sign languages.

In this perspective, the EUD and the WFD would like to highlight deaf women and girls, either at the global, European and national levels, present unique intersectionality as they belong to both the group of persons with disabilities and the group of linguistic and cultural minorities². Intersectionality is a crucial analytical lens and practical tool for identifying, addressing, and remedying the multiple and overlapping forms of discrimination experienced within our deaf communities³. When addressing the multiple and intersectional forms of discrimination against deaf women and girls, it is of the utmost importance to adopt a cultural and linguistic standpoint⁴, national sign languages being the core feature for the achievement and respect of the human rights of deaf people⁵. They are not only the preferred languages of deaf women and girls⁶, but they are also their primary and preferred means of communication and inclusion in all areas of society⁷. Furthermore, national sign languages have a critical role in ensuring deaf women and girls’ optimal mental, physical and social health across their lifespans⁸.

Deaf women and girls face some of the highest risks of multiple and intersectional discrimination. They are affected not only by their gender and disability but also by their language, which exposes them to linguistic discrimination that reinforces existing stereotypes and barriers. Denial of accessible health information is a clear example of disability-based discrimination, which becomes even more severe for women in reproductive healthcare where informed consent is essential. For deaf women and girls, the lack of access to national sign language adds another layer of language-based discrimination, creating compounded and intersectional barriers⁹. These risks are particularly acute for those who are Indigenous, from minority groups, living in rural or remote areas, migrants, or members of the LGBTQIA+ community.

In order to recognise and establish measures to combat multiple and intersectional discrimination against deaf women and girls, it is essential to acknowledge language as a ground for discrimination. This dimension has not been taken into account by the CRPD Committee in the drafting of General Comment No. 3 on Article 6, despite the World Federation of the Deaf (WFD) submitting recommendations to include a linguistic perspective and to highlight access to communication and information in accessible formats such as sign language¹⁰. These recommendations were overlooked in General Comment No. 3, but were later addressed in General Comment No. 6 on equality and non-discrimination as follows: ““Intersectional discrimination” occurs when a person with a disability or associated to disability suffers discrimination of any form on the basis of disability, combined with, (...) sex, **language**, (...), gender or other status¹¹” and “21. Protection against “discrimination on all grounds” means that all possible grounds of discrimination and their intersections must be taken into

¹ CRPD Committee, General Comment n°3 on Article 6 – women and girls with disabilities, point 5.

² WFD Position Paper on “[Complementary or diametrically opposed: Situating Deaf Communities within ‘disability’ vs ‘cultural and linguistic minority’ constructs](#)”.

³ EUD [Statement on Intersectionality](#).

⁴ EUD Alternative Report to the CRPD Committee in the framework of the EU Reporting before the CRPD Committee, September 2024.

⁵ UNCRPD, Articles 2, 9, 21, 24 and 30 read jointly.

⁶ European Parliament Resolution on Sign Language for the Deaf (Doc A2-302/87), Recital C.

⁷ European Parliament Resolution on sign languages, Official Journal C 379, 07/12/1998 P. 0066, Recital B.

⁸ WFD, Position Paper on [Access to National Sign Languages as a Health Need](#), 2022.

⁹ EUD Gender Report: [Combating Gender-based Violence and Discrimination against Deaf Women and Girls in the EU](#), 2024.

¹⁰ WFD Contribution available at: <https://www.ohchr.org/sites/default/files/Documents/HRBodies/CRPD/GC/Women/WFD.doc>

¹¹ CRPD Committee, General Comment n°6 on equality and non-discrimination, point 19.

account. Possible grounds include but are not limited to: disability (...) **language**; (...), or a combination of any of those grounds or characteristics associated with any of those grounds¹². These recommendations align with OHCHR guidance that anti-discrimination laws should cover a broad, open-ended list of protected grounds and allow recognition of additional grounds through an “other status” provision¹³.

III. Anti-discrimination legislation and/or policy frameworks

In many countries, disability and the denial of reasonable accommodation are becoming increasingly recognised in anti-discrimination legislation as prohibited forms of discrimination against persons with disabilities. However, recognition is not consistent across jurisdictions, and enforcement often remains weak. Moreover, very few countries currently recognise multiple and intersectional forms of discrimination in their legislation. Where such recognition exists, the scope is often limited to specific grounds, such as disability and gender, without extending protection to other relevant grounds, such as language, ethnicity, or migration status.

At the European Union level, Article 13 of the Treaty establishing the European Community (TEC) provides advanced protections against discrimination on the grounds of gender, racial or ethnic origin, religion or belief, disability, age, and sexual orientation. However, it does not address multiple and intersectional discrimination. The most recent compromise proposal for the long-awaited horizontal equality directive¹⁴ refers to multiple and intersectional discrimination, but only in the preamble, and it is uncertain whether the scope covers all six grounds listed in the Treaty or only a subset. By contrast, the EU Charter of Fundamental Rights provides a broader approach, prohibiting “any discrimination based on any ground such as sex, (...) **language**, (...) disability, age or sexual orientation¹⁵”. Case law of the Court of Justice of the European Union (CJEU) has also taken intersectionality into account in the past years, though significant gaps remain and the EU Agency for Fundamental Rights (FRA) has repeatedly called on EU legislators to broaden the concept of discrimination to include intersectional discrimination¹⁶. In 2023, the European Parliament urged that any updated proposal for a horizontal equality directive should address intersectional discrimination and explicitly prohibit discrimination on any combination of grounds listed in the Charter¹⁷. The CRPD Committee recommended the European Union improve explicit legal protection of persons with disabilities against multiple and intersectional forms of discrimination in all areas of life, including discrimination based on the intersection between disability and gender, among other grounds¹⁸.

Among the Member States of the European Union, the situation varies significantly, as some addressed multiple and intersectional discrimination in their legislation, going beyond the limited scope of the European Union anti-discrimination legislation. Several countries (e.g. Bulgaria, Germany, Greece, Spain, Croatia, Malta, Austria, Portugal, Romania, Slovenia, Finland) have legal provisions recognising multiple discrimination, and a smaller number (Belgium, Spain, and Finland) recognise intersectional discrimination, while in others, the issue has been partially addressed through case law (e.g. France, Malta, the Netherlands, and Portugal)¹⁹.

¹² *Idem*, point 21.

¹³ OHCHR Practical Guide on Protecting Minority Rights, p. xii.

¹⁴ Council of the European Union [Progress Report on the Directive on implementing the principle of equal treatment](#).

¹⁵ EU Charter of Fundamental Rights, Article 21.

¹⁶ European Parliament [Briefing on Council directive on equal treatment](#), 2025, p.3.

¹⁷ European Parliament resolution of 19 April 2023 on combating discrimination in the EU – the long-awaited horizontal anti-discrimination directive, 2023/2582.

¹⁸ CRPD Committee, Concluding Observations on the combined second and third periodic reports of the European Union, point 19 (c).

¹⁹ European Parliament Briefing, *idem*, p. 9.

Belgium provides a telling example. In 2021, a Belgian court examined the case of a deaf pregnant woman who was discriminated against in a recruitment process²⁰. She was denied employment on the basis of both disability and gender, but at the time Belgian law did not recognise multiple discrimination, forcing the court to combine the Anti-Discrimination Law and the Gender Law to award damages. This exposed a legal gap, as the deaf woman could not be formally recognised as a victim of multiple or intersectional discrimination. Although Belgium reformed its law in 2023 to recognise cumulative and intersectional discrimination, it still lacks explicit protection against language-based discrimination²¹. For deaf women, this remains a central gap: if denied both reasonable accommodation and access to information in their national sign language, their experience would not be fully recognised in law despite the clear violation of rights.

Therefore, not only should States Parties to the CRPD address multiple and intersectional discrimination in their antidiscrimination legislation, but also, they should explicitly add language as a ground for discrimination in anti-discrimination and equality legislation, alongside disability and gender. They must ensure that constitutional principles guaranteeing full enjoyment of human rights are realised, and that discrimination on the grounds of language or disability is explicitly prohibited²². Legislation should include clauses on linguistic equality, prohibiting discrimination, exclusion, or unreasonable disadvantage on the basis of language. Thus, legal frameworks often overlook the significance of acknowledging sign language rights as a fundamental aspect of non-discrimination. Guidelines should urge states to include intersectional discrimination based on gender, disability, and language in anti-discrimination laws and policies, as required under CRPD Articles 5 and 6.

Below are some examples from a few countries that show that this is feasible regarding sign language rights.

In Colombia, Article 34 of the Colombia's Law 982 of 2005²³ provides that any discrimination against a signing deaf or deafblind person on the basis of their linguistic or cultural identity, or against a speaking or semi-lingual deaf person on the basis of their deaf condition, will be sanctioned in accordance with the relevant legislation, even where the specific type of discrimination is not otherwise covered by the law²⁴. Similarly, in Bulgaria, while the legislation does not contain explicit provisions on equality and non-discrimination, it includes important references to the removal of communication barriers linked to sign language use²⁵. The law establishes the right of deaf and deafblind persons to access all spheres of public life, thereby implying non-discrimination on the basis of language. Article 1(2) requires the creation of conditions for the removal of restrictions in communication and access to information through Bulgarian Sign Language²⁶. Cuba recently passed the Decreto-Ley 8/2025, which legally recognises Cuban Sign Language as the official language of the Cuban Deaf Community. This law guarantees full and non-discriminatory access to information for deaf persons across all sectors, promotes bilingual education, and affirms the cultural identity of the Deaf Community in Cuba. These are significant examples of how sign language legislation can promote inclusion, cultural recognition, and accessibility for deaf women and girls, including in education and

²⁰ Court of Appeal of Antwerp, Antwerp Division, 28 June 2021, available at: <https://www.unia.be/nl/wetgeving-en-rechtspraak/rechtspraak/arbeidshof-antwerpen-afdeling-antwerpen-28-juni-2021>

²¹ Unia, webpage on [Discrimination and intersectionality](#).

²² WFD [Guidelines for Achieving Sign Language Rights](#), p. 32.

²³ Ley 982 de 2005 por la cual se establecen normas tendientes a la equiparación de oportunidades para las personas sordas y sordociegas y se dictan otras disposiciones, available at: <https://www.funcionpublica.gov.co/eva/gestornormativo/norma.php?i=17283>

²⁴ WFD Guidelines, *idem*, p. 44.

²⁵ WFD Guidelines, *idem*, p. 50.

²⁶ Bulgarian Sign Language Act Promulgated, SG No. 9/2.02.2021. Available at: <https://www.mlsp.government.bg/uploads/41/pkhurvsp/zakon-za-bylgarskiq-jestov-ezik.pdf>

public life²⁷. These examples show that it is possible to enshrine protection against language-based discrimination in law and to safeguard the right to use national sign languages. For deaf women and girls, such recognition is particularly crucial, as it not only addresses the barriers they face as persons with disabilities and as women but also protects them from linguistic discrimination, ensuring their equal participation and the full enjoyment of their rights.

IV. Data collection on deaf women and girls

Current data frameworks overlook the reality on deaf people at the national level, and even more regarding deaf women and girls' lived experiences and barriers faced. At any level, whether national, EU-level or global level, there is a persistent lack of disaggregated data reflecting the multiple and intersecting identities of deaf people, such as disability, gender, age, and ethnicity, including BIPOC communities. Where national-level data on deaf people does exist, it does not take into account their intersecting identities. This invisibility is compounding their exclusion. Indeed data collection processes are often inaccessible as they are not translated into national sign languages and effectively exclude respondents from deaf communities who could also participate in shaping the data that affects them.

At the EU level, the EUD surveyed 31 National Associations of the Deaf (NADs) on data collection²⁸. 14 NADs reported awareness of statistics disaggregated by disability, including deaf people, 9 reported no such data, and 3 were uncertain²⁹. On disability data disaggregated by gender, 10 NADs said data was disaggregated, 8 said it was not, and 11 were uncertain³⁰. These findings show inconsistencies and significant variations across Member States and confirm that the lived realities on deaf women and girls remain largely invisible within broader disability data frameworks.

At the global level, recognising that deaf communities, including deaf Indigenous Peoples, are systematically excluded from official data, the World Federation of the Deaf (WFD) has initiated community-led citizen data collection, specifically deaf-led, in line with the Copenhagen Framework on Citizen Data³¹ endorsed by the UN Statistical Commission³². Since 2021, WFD has conducted three citizen data projects: Nigeria (2022), Latin America and the Caribbean (2022–2023) and Bolivia (2024). These efforts centre deaf researchers and deaf-led organisations in the design and implementation, and analysis of data ensuring ownership and authenticity of the data. Findings of those research on deaf women and girls will be presented in the following sections under the relevant areas of rights exclusion. The Bolivia project, in particular, focused on deaf Indigenous women, highlighting the multiple intersectional discrimination they face and the critical gaps in state-level data collection³³. In particular, the only way to obtain reliable data from deaf Indigenous women is through their peers, in a culturally and linguistically concordant environment, and within a safe space where they can be assured that their privacy is respected.

In conclusion, findings from these citizen data initiatives, demonstrate that, while some efforts exist at national, EU, and global levels, deaf women and girls remain largely invisible in official statistics due to the absence of systematic, disaggregated, and accessible data in sign language, led by trained deaf researchers and supported by their representative organisations. Without language accessibility, cultural and linguistic concordant data collection, and recognition of intersectional identities, data

²⁷ Gaceta Oficial de la República de Cuba, Decreto-Ley No. 8/2025, Artículo 1. Available at: https://www.fgr.gob.cu/sites/default/files/Normas%20juridicas/2025-02/goc-2025-o6_0.pdf

²⁸ EUD [Survey on Data Collection](#).

²⁹ EUD, *idem*, p. 3.

³⁰ EUD, *idem*, p. 4.

³¹ The Copenhagen Framework on Citizen Data, 4-7 March 2025, available at:

https://unstats.un.org/UNSDWebsite/statcom/session_56/documents/BG-3e-The_Copenhagen_Framework_on_Citizen_Data-E.pdf

³² UN Statistical Commission, webpage on [Citizen Data](#).

³³ WFD [Pilot Study of Deaf Indigenous Bolivian Women's Health Experiences](#), 2024.

frameworks will continue to fail to capture the realities of deaf communities. We encourage the conduction of citizen data initiatives as they ensure safe participation, linguistic rights and improved outcomes. Member States must not only strengthen official disability disaggregation efforts but also invest in and recognise deaf-led citizens' data as a legitimate and essential form of knowledge production.

V. Areas of life in which deaf women and girls are more excluded from the access and enjoyment of their rights

Deaf women and girls face multiple and intersecting discrimination based on grounds of disability, gender, and language. These overlapping barriers restrict their rights and access to healthcare, sexual and reproductive rights (SRHR), protection from violence, justice, and public life. This section highlights these barriers, presents evidence, and offers recommendations to address them. The biggest barrier faced by deaf women and girls is the systemic lack of access to communication and information in their national sign languages. Without accessible communication, deaf women and girls are excluded from essential services in society, experiencing poorer health outcomes, and facing greater risks of gender-based violence.

A regional survey across 23 countries in East, Central, West (25%), and Southern Africa showed that 24% of respondents were deaf or hard of hearing, and they identified that the biggest barrier they faced in their lives was the lack of access to communication in the national sign language compared to other potential barriers faced in areas such as socio-economic status, health, education, access to technology, and harmful traditional practices³⁴. This is further exacerbated by the widespread language deprivation: 90% of deaf children are born to hearing parents, yet an estimated 98% do not have access to education in sign language. This denial of language access leaves many deaf children, and especially deaf girls, mostly without a strong linguistic foundation for awareness of their rights, undermining their ability to develop health literacy, understand and claim their rights, report abuse and make informed decisions throughout their lives³⁵.

1. Healthcare and sexual and reproductive health and rights:

The CRPD Committee has emphasised that the right to health cannot be realised without accessible information and communication, including through sign language, and that the gender dimension must be taken into account in ensuring access to reproductive health services for deaf women and girls³⁶.

A research conducted by the WFD in Nigeria revealed significant gaps in deaf women's access to public health information. Among the 17 deaf women respondents, the majority reported that the Ministry of Health or local health authorities had never provided public health information in the national sign language through professional and accredited interpreters (76%), and 64% stated that health information in closed captions was never, rarely, or only sometimes available³⁷. Furthermore, 65% of women said they did not receive accessible information about COVID-19 through sign language, and 76% agreed that health authorities do not provide health information in the national sign language³⁸. The situation is more alarming for Indigenous deaf women, as investigated during a WFD research study in Bolivia. Among the 13 indigenous women surveyed about their access to healthcare,

³⁴ Humanity and Inclusion Report on [Powerful yet overlooked: African women with disabilities and the ongoing struggle for inclusion](#), 2024, p. 23.

³⁵ WFD Pilot Study, *idem*, p. 2.

³⁶ CRPD Committee Concluding Observations.

³⁷ WFD [Report on Barriers to Healthcare Access for Deaf Nigerian Women and Girls during Emergencies: Analyzing the Additional Impacts on their Intersectional Identity](#), 2022, p. 12.

³⁸ *Idem*.

the majority of the 13 deaf Indigenous women responded that they never or rarely receive the same quality and relevance of public messages and information on health issues as their non-deaf peers (92,3%), they were not consulted in the decision-making processes relevant to their healthcare (100%), and expressed feelings of frustration or powerlessness due to the systemic exclusion from healthcare information and services (76,9%)³⁹.

Regarding access to healthcare services, deaf women face specific barriers, including attitudinal discrimination by health-care staff, refusal of services, and the additional costs of hiring sign language interpreters, as shown in testimonies such as that of a 27-year-old deaf woman in Nigeria who described the financial burden of accessing antenatal care⁴⁰. Research consistently confirms that those barriers contribute to poorer health outcomes within deaf communities, impacting mostly deaf women and girls. Additionally, they face higher rates of mental health issues, low health literacy, and mistrust of medical professionals⁴¹. This is also the case in their access to healthcare on reproductive rights, as deaf women in particular experience higher barriers to access health services in reproductive healthcare, such as access to screening for cancer. Moreover they present worse birth outcomes compared to hearing women, with increased risks of pre-eclampsia, low birth weight, and preterm birth. These figures illustrate the devastating impact of language deprivation and systemic exclusion, reinforcing the urgent need for intersectional approaches that address gender, disability, linguistic access, and cultural identity. In Spain, a recent study on the access to healthcare of deaf women has revealed that 41% of them do not feel adequately attended to on women-related health issues (such as menopause, period pain, breast lumps, etc.) because healthcare professionals lack knowledge on their needs and are not proficient in their national sign language⁴².

Another critical barrier lies in the medical field, where deaf women are exposed to serious abuses of their rights, such as forced sterilisation and forced abortion, practices that remain legal in some EU Member States⁴³. In these cases, medical professionals often exploit the absence of accessible information in national sign languages to deny deaf women full and informed consent, undermining their reproductive rights and agency. In Argentina a landmark case filed by a deaf woman in 2017 who was sterilised without her consent and knowledge as a minor, marking a turning point in the State of Argentina's response to such abuses with the new Law No. 27.655⁴⁴. These violations are more acute for deaf Indigenous women. In Bolivia, although 61.5% completed tertiary education within the mainstream system, the majority lacked information about their SRHR as they did not receive Comprehensive Sexuality Education (61,5%), did not know anything regarding Sexually Transmitted Infections (84,6%), were not using or knew about family planning/contraception method (53,8%) nor received information on family planning/contraception methods and prevention of Sexually Transmitted Infections (69,2%)⁴⁵. These gaps stem from a lack of public health information that is culturally, linguistically, and cognitively appropriate. As a result deaf Indigenous women face a higher risk of gender-based discrimination, exploitation and violence, and are often left without the tools or support to make informed decisions about their health and lives.

2. Gender-Based Violence:

Lack of access to sexual and reproductive health information, particularly in national sign languages, exposes deaf women and girls to heightened risks of sexual violence⁴⁶. The CRPD Committee has

³⁹ WFD Pilot Study, *idem*.

⁴⁰ WHO Global Report on Health Equity for Persons with Disabilities, p. 74.

⁴¹ WFD Pilot Study, *idem*, p. 35.

⁴² CNSE Report on "[Encuesta Sobre Salud Integral y Mujeres Sordas](#)", 2021.

⁴³ EUD Gender Report, *idem*, p. 8.

⁴⁴ Asociación Civil por la Igualdad y la Justicia (ACIJ). *Esterilizaciones forzadas: un capítulo de horror que toca su fin*. 2024. Retrieved from <https://acij.org.ar/esterilizaciones-forzadas-un-capitulo-de-horror-que-toca-su-fin/>

⁴⁵ WFD Pilot Study, *idem*, p. 5.

⁴⁶ CRPD/C/MEX/CO/1, para. 50 (b).

underlined that deaf and deafblind women are at greater risk of sexual abuse due to isolation, dependency, and oppression⁴⁷.

GBV awareness campaigns are rarely accessible in national sign languages, leaving many deaf women and girls uninformed about their rights or available support services. For example, Deaf Bolivian women often struggled to identify and recognise sexual abuse, as many later disclosed incidents describing harassment and unwanted touching that left them traumatised. In most cases, these experiences came from hearing relatives or partners. Their experiences had never been taken seriously, often dismissed, and deaf-friendly support services were not available to them. For many participants, these research interviews provided the first safe space where they could openly share these experiences while receiving support⁴⁸.

Even when information exists, services are rarely inclusive or accessible for deaf women and girls. A major barrier for deaf women facing GBV is inaccessible reporting and support: helplines are often audio-based only, with no alternatives like direct SMS or video options, and professional interpretation in national sign languages is seldom provided⁴⁹. Many shelters are often inaccessible for deaf women or are able to communicate with them in a respectful and linguistically appropriate manner. In Sweden, research found none of 282 shelters offered support in Swedish Sign Language or had staff with Deaf competence⁵⁰, leading to the creation of a deaf-specific shelter with online chat and counselling in sign language,⁵¹ which represents a good practice of accessible and inclusive GBV support services for deaf women.

Additionally, professionals who are expected to support victims of GBV, such as police officers or service providers, frequently lack training to respond adequately to deaf women and girls. Altogether, these barriers not only increase the vulnerability of deaf women and girls to GBV but also prevent them from seeking help, obtaining justice, or accessing adequate protection.

3. Access to justice:

Deaf women are less aware of how or where to report violations of their rights compared to women with other disabilities. Survey data shows that only 59% of deaf women know where to report rights violations, compared to 71% of women with disabilities overall⁵². This lack of awareness is directly linked to systemic failures in providing accessible information in national sign languages and ensuring that justice systems are linguistically accessible for deaf women and girls. Deaf women face challenges in accessing the justice system due to communication barriers. To address these barriers, States Parties to the CRPD shall ensure procedural accommodations are foreseen for any deaf woman and girl, such as professional national sign language interpretation during legal proceedings, as well as training for law enforcement professionals, such as police officers, and judicial personnel on how to effectively communicate with deaf women.

4. Participation in public and political life:

Deaf women face barriers both within deaf-led organisations and in wider political participation. Testimonies from Africa reveal that they are often not encouraged to join deaf associations, sometimes being kept at home by overprotective families, while leaders of deaf organisations report

⁴⁷ CRPD/C/BRA/CO/1, para. 14.

⁴⁸ WFD Pilot Study, *idem*, pp. 7-8.

⁴⁹ EUD Gender Report, *idem*, p. 8.

⁵⁰ NKJT, Report on [A Kafkaesque Process](#) - a survey of how Swedish authorities treat victims of violence who are Deaf, hard of hearing and deaf-blind women and young girls as well as non-binary persons, 2021.

⁵¹ Swedish Women's Shelter and Support in Sign Language, webpage available at: <https://nkit.se/nkit-in-english/>

⁵² Humanity and Inclusion, *idem*, p. 56.

fewer activities available for deaf women⁵³. In political and governance processes, deaf women rely on family members for information on voter registration and elections, as sign language interpretation is rarely provided⁵⁴. Even when present at community meetings, deaf women remain under-represented, excluded, sidelined, or unable to follow proceedings due to lack of interpretation, leaving them invisible in decision-making spaces⁵⁵.

VI. Recommendations:

We support the recommendations from General Comment No. 3 of the CRPD Committee on women and girls with disabilities as an important starting point. However, we stress the need to further elaborate and adapt these recommendations to address the specific situation of deaf women and girls, particularly with regard to their rights as members of a linguistic and cultural minority through the use of national sign languages. With this in mind, we recommend the following measures to States Parties to the CRPD when it comes to address multiple and intersectional discrimination against women and girls with disabilities, and especially deaf women and girls:

(a) Repeal discriminatory laws, policies and practices that prevent deaf women and girls from enjoying their rights, and outlaw discrimination on the grounds of gender, disability, language, and other intersecting identities, while keeping the scope of grounds open-ended to encompass new grounds in the future evolving realities. States must criminalise sexual violence against deaf women and girls, prohibit forced sterilisation, forced abortion and non-consensual birth control, and address medical abuse arising from the lack of national sign language access that denies free and informed consent. At the same time, laws and policies must be accompanied by positive measures to ensure that health professionals, support services, shelters and other relevant actors are fully inclusive, trained, and equipped to provide accessible information and communication in national sign languages.

(b) Adopt laws, policies and measures that explicitly integrate the rights of deaf women and girls into disability, gender and language equality frameworks, as well as legislation recognising the linguistic rights of deaf people, especially deaf women and girls, in the relevant areas such as access to healthcare, access to GBV-related services, access to justice, access to public and political life, and must guarantee accessible information and communication, especially in the field of health and sexual and reproductive health, in national sign languages.

(c) Remove barriers to participation by ensuring the full and meaningful inclusion of deaf women and girls, through their representative organisations, in the design, implementation and monitoring of all programmes and policies that affect them. This includes securing their participation in political and public life in national sign languages and guaranteeing their representation in national monitoring and decision-making bodies, with adequate provision of professional sign language interpretation at all levels of governance.

(d) Ensure the collection of disaggregated data on deaf women and girls across all relevant areas of life, in consultation with their representative organisations. Such data should reflect multiple and intersectional forms of discrimination, including disability, gender and language. Data collection processes themselves must be accessible in national sign languages and designed as well as implemented in culturally and linguistically concordant ways.

(e) Ensure disability-, gender- and language-sensitive international cooperation, including specific recognition of deaf women and girls in the implementation of the 2030 Agenda for Sustainable

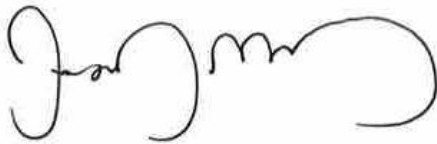
⁵³ *Idem*, p. 16.

⁵⁴ *Ibidem*, p. 18.

⁵⁵ *Ibidem*, p. 10.

Development and other international frameworks. Data and indicators must reflect their access to healthcare, sexual and reproductive health and rights, education, employment, participation in public life, and protection from gender-based violence.

If you have any questions or queries, do not hesitate to contact the EUD Policy Manager, Mr Alexandre Bloxs at alexandre.bloxs@eud.eu and the WFD Sign Language Rights Officer, Ms Susana Stiglich at Susana.stiglich@wfdeaf.org.



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