



Recommendations for the EU Gender Equality Strategy 2026- 2030

European Disability Forum Position Paper
July 2025

**EDF written input and recommendations for the EU
Gender Equality Strategy 2026-2030.**



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Introduction

The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Objective

This position paper highlight concrete actions recommended by EDF for the Gender Equality Strategy 2026-2030, aimed at including the rights of women and girls with disabilities, which constitute 29,2%¹ of the female population in the EU, and face exclusion and discrimination in all areas of life.

¹ [Eurostat, Level of disability \(activity limitation\) by sex, age and income quintile \(2025\)](#)

Issues and recommendations by the UN Committee on the Rights of Persons with Disabilities (CRPD)

In March 2025, the CRPD Committee published its concluding observations of the European Union and pointed out areas of concerns, and recommendations to the EU.

The Committee expressed concerns about several issues, especially on women and girls with disabilities (article 6 UN Convention):

- EU legislation and policies on gender equality and disability **insufficiently** protect the rights of women with disabilities.
- The [Gender Equality Strategy for 2020-2025](#) and the [Strategy on the Rights of Persons with Disabilities 2021-2030](#) **lack a focus** on the rights of women with disabilities.
- The implementation of the [Gender Action Plan III \(GAP III\)](#) at the level of Member States and in EU external actions does **not systematically consider** the experiences of multiple and intersectional discrimination against women and girls with disabilities.
- The **views** of women and girls with disabilities have **not been consistently incorporated** in policy development, even when they are consulted.
- There is a **gap in disaggregated data** on the participation of women with disabilities in decision-making positions across the political, economic and social spheres and there is a lack of data collection on inclusion and intersectionality in EU external action.

Regarding freedom from exploitation, violence and abuse (article 16) and protecting the integrity of the person (article 17) the Committee is concerned that:

- Persons with disabilities are at **heightened risk of violence and abuse**, in particular women, older persons, LGBTIQ+ persons and children with disabilities, and persons with disabilities living in closed settings.
- The [Directive on combating violence against women and domestic violence](#) does **not explicitly prohibit rape, forced sterilisation, sexual harassment**, and other forms of gender-based violence against women and girls with disabilities.
- **Access to specialised services** for survivors with disabilities of gender-based violence is **insufficient** and that there are no specific

protection mechanisms for deaf and hard of hearing women and girls accessing services or reporting abuse.

- There is **no systematic monitoring** of institutional settings.
- Persons with **intellectual and/or psychosocial disabilities**, including women and children with disabilities are **exposed to harmful, invasive and irreversible forms of treatment**, including forced sterilisation, abortion and contraception.

Regarding work and employment (article 27) the Committee is concerned that:

- Despite progress in recent years, **discrimination** against persons with disabilities **in work and employment** is still pervasive, including lower wages, part-time or low paid jobs, lower participation in full-time employment affecting particularly women with disabilities, persons with intellectual and/or psychosocial disabilities, persons with intensive support needs and women (mothers, wives, sisters) caring for family members with disabilities.

Regarding adequate standard of living and social protection (article 28), the Committee is concerned that:

- The **high levels of poverty and social exclusion** of persons with disabilities, particularly women with disabilities, autistic persons and persons with disabilities with intensive support needs.

Based on the concerns listed above, the Committee recommends to the EU to:

- **Mainstream disability and gender** across all legislation and policy frameworks and programmes, and expand the scope of the Gender Equality Strategy to include the rights of women with disabilities to work and employment, and the rights of women and girls with disabilities to political and public participation, an adequate standard of living, health and education.
- Strengthen cooperation between the [European Institute for Gender Equality](#) and Member States' national programmes for the advancement of women and girls to effectively address multiple and intersectional discrimination against women and girls with disabilities, and ensure that all international cooperation is disability- and gender-responsive and that it protects women and girls with disabilities in institutions, belonging to ethnic minorities, LGBTIQIA women with disabilities, and women and girls with disabilities in situation of migration.

- Ensure close **consultation and active involvement of women and girls with disabilities through their representative organisations** in the preparation and implementation of the EU policies and programmes.
- **Improve disaggregated data collection** on the participation of women and girls with disabilities in the political, economic and social spheres and on inclusion and intersectionality in EU external action in partner countries, and closely consult and actively involve their representative organisations, in the EU and in partner countries, in the development of data collection systems that identify their diverse lived experiences.
- **Explicitly prohibit rape, forced sterilisation and sexual harassment** and other forms of gender-based violence against persons with disabilities.
- Ensure that persons with disabilities, through their representative organisations, are closely **consulted and actively involved** in the implementation and monitoring of the [Strategy on the Rights of the Child](#), the [Istanbul Convention](#), the [Directive on combating violence against women and domestic violence](#), and of the [Anti-Trafficking Directive](#);
- Combat violence and abuse of children and adults with disabilities in **institutional settings**, including in psychiatric facilities, and provide funds for the establishment of independent monitoring of such settings.
- Continue and strengthen efforts to **address discrimination** of persons with disabilities **in employment**, including women and persons with intellectual and/or psychosocial disabilities, by, inter alia, enforcing the Equality Employment Directive across Member States and strengthening equality bodies, as provided for by Directive 2024/1499, and ensuring access to minimum wages on an equal basis with others.
- Earmark **allocations** in the **EU Social Fund** to increase funding for social inclusion and combating poverty of persons with disabilities and ensure that investments of the Social Fund address structural inequalities and intersectional discrimination of women and girls with disabilities, autistic persons and persons with intensive support needs.

EDF calls for actions to be included in the the Strategy

EDF supports the recommendations of the UN Committee on the Rights of Persons with disabilities. In addition, our organisation calls for the inclusion of targeted actions in the next Gender Equality Strategy.

Gender-based violence

- Adopt an **EU Directive** explicitly criminalising **forced sterilisation** as a form of **gender-based violence, sexual exploitation and torture**, aligned with international human rights law (UN CRPD, CEDAW, and Istanbul Convention). Ensure the Directive includes:
 - Explicit prohibition of sterilisation without prior, free, and informed consent.
 - Removal of legal conditions allowing medical professionals or guardians to consent on behalf of women and girls with disabilities.
 - Clear penalties and access to justice for survivors.
- Establish an **EU Observatory on Disability and gender-based violence**.
- Require member states to **monitor and report on gender-based violence** in institutional settings (e.g., residential institutions for persons with disabilities).
- Require **disaggregated data collection by gender and disability** in all EU-funded gender-based violence programs and national reporting mechanisms.
- Require all member states to **collect disaggregated data based by gender and (type of) disability** in **surveys** on gender-based violence.
- Guarantee the right to **accessible legal procedures and supports to all women and girls with disabilities**, including through reasonable accommodation in court, provision of Easy-to-read legal documents, personal assistance, Sign language interpreters, live captioning/speech-to-text interpretation (CART, communication access real-time translation).
- Fund **awareness campaigns and training** in every member state for healthcare professionals, judges, police officers, educators and law enforcement officers on the illegality and harm of forced

sterilisation.

- Promote **peer-led education** and self-advocacy programs in member states for women and girls with disabilities about their bodily autonomy and reproductive rights.
- Develop **EU-wide minimum standards** for safeguarding women and girls with disabilities in institutional and care settings.
- Support the creation of **independent complaint mechanisms** that are accessible to all women and girls with disabilities, including with intellectual and psychosocial disabilities, and women with hearing loss.
- Fund **research** on the prevalence and nature of gender-based violence experienced by women and girls with different types of disabilities, to inform policy.
- Train **law enforcement and judicial authorities** on handling cases involving women with disabilities, with an intersectional approach.
- Fund **legal aid and services** that specialise in supporting women with disabilities experiencing gender-based violence.

Disability-inclusive gender-responsive healthcare

- Propose an **EU-wide legal framework** guaranteeing that **all healthcare interventions require the free and informed consent** of the person, including women and girls with intellectual and psychosocial disabilities.
- Prohibit medical practices that rely on **substituted decision-making**, especially in sexual and reproductive healthcare.
- Require member states to make **sexual and reproductive health and rights services fully accessible** for women and girls with disabilities, including by ensuring physical accessibility of infrastructure, providing information in accessible formats such as braille, Easy-to-Read, Sign Language, and ensuring availability of contraception, gynaecological care, and pregnancy support tailored to women and girls with disabilities.²

² As an example, the CEDAW Committee recommended to Poland, in its [Report to “Inquiry concerning Poland conducted under article 8 of the Optional Protocol to the Convention”](#) to “Take the measures necessary to ensure that the autonomy and decisions of women with disabilities are respected in relation to their sexual

- Develop **training modules for health professionals** on communication with women with different types of disabilities, especially regarding consent and sexual and reproductive health and rights.
- Fund and support **peer-led counselling** and decision-making support systems for women with disabilities.
- Allocate EU funds to create **inclusive public health campaigns** on sexual and reproductive health and rights that reach women and girls with disabilities.
- Establish **accessible complaint mechanism** within national health systems, enabling women with disabilities to report mistreatment safely and anonymously.
- Support the development of **community-based** sexual and reproductive health and rights services **led and co-designed** by women with disabilities.

Disability-inclusive gender-responsive employment

- Enforce the **Equality Employment Directive** across member states:
 - Explicitly address the multiple and intersectional discrimination based on gender and disability, including discrimination by association faced by mothers of children with disabilities or caring for relatives with disabilities;
 - Introduce mechanisms for employers to implement reasonable accommodations;
 - Mandate proactive equality measures in public and private sector recruitment, retention, and promotion practices.
- Strengthen **equality bodies**, as provided by Directive 2024/1499 and support national equality bodies and labour inspectorates to **monitor and address multiple discrimination** more effectively.

and reproductive health and rights, they receive sexual and reproductive education, and that they are given access to safe abortion and protection from forced sterilization and forced abortion". The CEDAW committee also recommended to "Ensure that women and girls with disabilities have the right to access abortion and to decide freely on all other matters related to their sexuality, including their sexual and reproductive health, free of coercion, discrimination and violence; to ensure, namely, that no medical procedures may be performed on them without their free, prior and informed consent".

- Require that EU-funded **employment and training programs** include gender and disability indicators and reporting mechanisms.
- Require all EU and national **lifelong learning and vocational education** programs to be fully accessible and inclusive to women and girls with disabilities.
- Create **EU guidelines on intersectional equality in the workplace**, tailored to the experiences of women with disabilities (e.g. pay gaps, harassment, promotion barriers).
- Support **research and data collection** on the gender-disability employment gap, disaggregated by type of disability, sector, and member state.

Equal participation, leadership and political participation of women and girls with disabilities

- Reform the **EU Electoral Act of 1976 to align with the UN CRPD** and therefore realise the political rights of persons with disabilities, focusing on the participation of women and girls with disabilities.
- Ensure women and girls with disabilities have the rights to **vote and stand for election** regardless of legal capacity status.
- Launch an **EU program and fund awareness raising campaign** to support and promote leadership of women and girls with disabilities across politics, workplaces, public life, etc.

Disability-inclusive and feminist foreign policy

- **Mainstream disability** and gender in all **EU external action** policies and instruments, including the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe); the EU Action Plan on Human Rights and Democracy; the Gender Action Plan III (GAP III) and futures Gender Action Plans; and the EU climate policy.

Annex I

This annex compiles the recommendations of the CEDAW Committee contained in the concluding observations addressed to the EU member states, regarding women and girls with disabilities. The recommendations are in chronological order.

Denmark³

The CEDAW Committee issued the following recommendations to Denmark.

On general context:

- Consolidate the Danish social model throughout the State party as a driving force for sustainable change, and use it as a catalyst for implementing measures, in the context of the COVID-19 pandemic, to redress long-standing inequalities between women and men by placing women and girls at the centre of recovery strategies, in accordance with the 2030 Agenda, paying particular attention to unemployed women and women living in poverty, women belonging to ethnic or national minorities, indigenous women, older women, women with disabilities, migrant, refugee and asylum-seeking women, and lesbian, bisexual and transgender women and intersex persons;

On National machinery for the advancement of women:

- Revise the national strategy for future gender mainstreaming assessment work in the public sector of 2013 and introduce an integrated approach to gender mainstreaming to achieve equality between women and men, as well as effective monitoring and accountability mechanisms, including by continuing to systematically conduct gender impact assessments of legislation, ensuring that implementation is evaluated on the basis of compliance with relevant targets and indicators and disaggregated data collection, including with regard to women and girls with disabilities;

On temporary special measures:

- Make use of temporary special measures, in accordance with article 4 (1) of the Convention and the Committee's general recommendation No. 25, and provide incentives such as gender scorecards, strengthen targeted recruitment and establish time-bound goals and quotas in all areas covered by the Convention and at all levels where women are underrepresented or disadvantaged in both the public and private sectors, including private companies,

³ [CEWAW Committee, Concluding observations to Denmark, 2021](#)

in order to significantly increase the number of women who are members of boards of directors and the number of women in management positions. The Committee also recommends that the State party implement temporary special measures to accelerate the achievement of de facto equality for women belonging to disadvantaged groups, such as migrant women, CEDAW/C/DNK/CO/9 8/16 21-03218 older women, women with disabilities, indigenous women, lesbian, bisexual and transgender women and refugee and asylum-seeking women;

On gender-based violence against women:

- Take urgent measures to address the high rate of sexual violence against women with disabilities, in particular intellectual or psychosocial disabilities;
- Evaluate the Greenlandic Strategy and Action Plan against Violence (2014–2017) and adopt a new strategy and action plan to combat gender-based violence, including sexual and domestic violence, against women and girls, including women and girls with disabilities, linking it to the prevention of suicide, substance abuse and the action plan on parental neglect, with clear goals and mechanisms for prevention, monitoring and follow-up, and continue to implement measures under the Alliaq programme, which targets perpetrators of domestic violence, and under the expired strategy;
- Ensure the collection and analysis of data, disaggregated by sex, age, nationality and disability, on gender-based violence against women and girls in Greenland and the Faroe Islands;

On education:

- Strengthen its measures to improve the inclusion of girls with disabilities in the mainstream education system and include in its next periodic report information and statistical data, disaggregated by sex and type of disability, on school attendance, dropout rates and access to vocational and university education for children with disabilities;

On employment:

- Collect comprehensive data on the participation of migrant women and of women with disabilities in the labour market and provide such information in the next periodic report;

On health:

- Continue to collect and analyse information and data on the causes of the high incidence of cancer in women and report on them in the next periodic report, and set specific targets to increase the participation of women with disabilities in free national cancer screening;

Sweden⁴

The CEDAW Committee issued the following recommendations to Sweden.

The Committee noted with concern the lack of information on the situation of women with disabilities and recommended that Sweden, in line with its general recommendation No. 18 (1991) on disabled women:

- Address intersecting forms of discrimination against women and girls with disabilities and ensure their inclusion and access to all rights under the Convention, including by eliminating restrictions on their legal capacity, ensuring their access to justice, protection from gender-based violence, inclusive education, employment and health services, including sexual and reproductive health and rights, and addressing their specific needs;
- Ensure that all women and girls with disabilities are able to access the labour market, give their free and informed consent to decide where and with whom they choose to live, and access all support services available to victims of gender-based violence.

The Committee addressed other recommendations to Sweden.

On general context:

- Consolidate the Swedish social model throughout the State party as a driving force for sustainable change and use it as a catalyst for implementing measures in the context of the COVID-19 pandemic to redress pre-existing gender inequalities by placing women and girls at the centre of recovery strategies in line with the 2030

⁴ [CEDAW Committee, Concluding observations to Sweden, 2025](#)

Agenda, paying particular attention to unemployed women and women living in poverty, women belonging to ethnic or national minorities, Sami women, older women, women with disabilities, migrant, refugee and asylum-seeking women, and lesbian, bisexual and transgender women and intersex persons;

- Continue raising awareness among women about their rights under the Convention and corresponding remedies, targeting in particular women belonging to disadvantaged groups, including Sami, Roma, migrant, asylum seeking and refugee women and women with disabilities;

On temporary special measures:

- Implement temporary special measures to accelerate equal participation by women belonging to disadvantaged groups, such as migrant women, older women, women with disabilities, Sami women, Roma women, lesbian, bisexual and transgender women and intersex persons and refugee and asylum-seeking women;

On gender-based violence against women:

- Strengthen and fully implement the current strategy in place to combat gender-based violence, including sexual and domestic violence against women and girls, including women and girls with disabilities, by incorporating the knowledge and use of algorithms to prevent gender stereotyping and by linking the strategy to the prevention of suicide and substance abuse and to the action plan on parental neglect, with clear goals and mechanisms for prevention, monitoring and follow-up;
- Ensure the collection and analysis of data, disaggregated by age, nationality, country of origin, disability and the relationship between the victim and the perpetrator, on gender-based violence against women and girls;

On equal participation in political and public life:

- Continue to take targeted measures to maintain its achievements in ensuring a high rate of representation of women in political and public life in the Riksdag and at the regional and municipal levels. The Committee also recommends that, in doing so, the State party pay particular attention to underrepresented groups of women, such

as Sami women, Roma women, women with disabilities and lesbian, bisexual and transgender women and intersex persons, among others;

On education:

- Strengthen its measures to improve the inclusion of girls with disabilities in the mainstream education system, and include in its next periodic report information and statistical data, disaggregated by sex and type of disability, on school attendance, dropout rates and access to vocational and university education by girls with disabilities;

On employment:

- Strengthen measures to eliminate occupational segregation and enhance access by women, including migrant women, women belonging to minority groups, indigenous women and women with disabilities, to formal employment, encourage women and girls to select non-traditional career paths, and prioritize the transition of women from part-time to full-time work, including by providing a sufficient number of adequate and accessible childcare facilities;
- Collect comprehensive data on the participation of migrant women, women belonging to minority groups, indigenous women and women with disabilities in the labour market and include such information in the next periodic report;

On health:

- Pay special attention to the health needs of women with disabilities, ensuring their access to support services such as rehabilitation and psychosocial care;

Year 2022

Portugal⁵

The CEDAW Committee issued the following recommendations to Portugal.

⁵ [CEDAW Committee, Concluding observations to Portugal, 2022](#)

On women with disabilities:

- Take all necessary measures to reduce the structural inequality faced by women and girls with disabilities in accessing education, the labour market, health care, economic empowerment programmes and family benefits, among other areas, and to ensure the effective consultation and participation of women with disabilities, particularly in the Consultative Council of the Commission for Citizenship and Gender Equality;
- Adopt effective measures to guarantee the right of women with disabilities to live in the community and to their full inclusion and participation in it, ensuring in particular that they have the opportunity to choose their place of residence and with whom to live, to enjoy decent and accessible housing, and to benefit from a range of in-home assistance, including personal assistance;
- Ensure the full, free and informed consent of women with disabilities for any intervention or medical treatment, train health professionals on human rights, dignity, autonomy and the needs of women with disabilities, and promulgate ethical standards for public and private health care.

On women's access to justice:

- Implement awareness-raising campaigns targeting disadvantaged groups of women, such as women with disabilities, Roma women, migrant women and older women, empowering them to submit complaints, to access free legal aid and to benefit from reparation to victims;

On temporary special measures:

- Include temporary special measures in its public policy on gender equality and other sectoral policies to address the needs of the most disadvantaged groups of women, such as women with disabilities, Roma women, migrant women and older women;

On harmful practices:

- Conduct information and awareness-raising campaigns targeting disadvantaged groups of women, such as women with disabilities, Roma women and migrant women, so that victims of female genital

mutilation, child and/or forced marriage and non-consensual sterilization receive the compensation provided for under the framework for granting compensation to victims of violent crimes and domestic violence, as established in Law No. 104/2009;

On equal participation in political and public life:

- Introduce mechanisms to increase the participation of marginalized women, such as women with disabilities, Roma women and other traditionally underrepresented women, in political and public life;

On education:

- Increase programmes and budget allocations for scholarships and study grants targeting women and girls with disabilities and ensure accessibility and reasonable accommodation at all levels in schools across the State party;

On economic empowerment:

- Define and implement temporary special measures to guarantee access to adequate housing for women, particularly to those belonging to disadvantaged groups, such as women with disabilities, Roma women, migrant women, single mothers, young women and older women, including by providing rental allowance and prioritizing the allocation of public housing in the municipal plans.

Belgium⁶

The CEDAW Committee issued the following recommendations to Belgium.

On women with disabilities:

- Ensure that all women and girls with disabilities are able to access the labour market, give their free and informed consent to decide where and with whom they choose to live, and access all support services available to victims of gender-based violence;
- Address intersecting forms of discrimination against women and girls with disabilities and ensure their inclusion and access to all rights under the Convention, including by eliminating restrictions on their legal capacity and ensuring their access to justice; protection from gender-based violence; and access to inclusive education,

⁶ [CEDAW Committee, Concluding observations to Belgium, 2022](#)

employment and health services, including sexual and reproductive health services.

On access to justice:

- Take all measures necessary to eliminate the serious obstacles to access to justice faced by all women, including undocumented women and women with disabilities, by ensuring the provision of procedural and age-appropriate accommodation, as well as interpretation services, and by granting a residence permit during the entire judicial proceedings for undocumented victims;

On temporary special measures:

- Define and introduce “affirmative actions” for women in current and future sectoral public policies aimed at disadvantaged populations (such as migrants, Roma and persons with disabilities), aimed at accelerating the achievement of substantive equality of women and men;

On harmful practices:

- Ensure that, in practice, women with disabilities, particularly with intellectual or psychosocial disabilities, are not subjected to sterilization without their free, prior and informed consent, and offer them training programmes on health and sexual and reproductive rights, including the prevention of sexual abuse, in accessible formats and adapted to their particular needs;

On gender-based violence against women:

- Ensure the systematic collection of data on gender-based violence against women and girls, disaggregated by age, nationality, disability and the relationship between the victim and the perpetrator;
- Ensure the collection and analysis of comprehensive updated statistical data on violence perpetrated in the name of culture, customs, religion, tradition or so-called “honour”, disaggregated by age, nationality, disability and the relationship between the victim and the perpetrator;

On education:

- Strengthen access for girls and women from disadvantaged groups, including Roma, migrant, refugee and asylum-seeking girls and girls

with disabilities, to mainstream education at all levels and include in its next periodic report disaggregated statistical data on school enrolment and completion, dropout rates and access to vocational and university education;

On employment:

- Take all necessary measures, including temporary special measures, to combat the structural barriers faced by women from disadvantaged groups (such as migrant women, undocumented women, women with disabilities, Roma women and older women) to secure full and productive employment, decent work and equal pay for work of equal value;

On health:

- Ensure that all women and girls without sufficient means, in particular those belonging to disadvantaged groups, have free access to health care, which must be accessible, including sexual and reproductive health services and the right to abortion;

Finland⁷

The CEDAW Committee issued the following recommendations to Finland.

On temporary special measures:

- Continue and further strengthen specific temporary special measures to accelerate the participation of women belonging to disadvantaged groups, such as migrant women, Roma women, Sami women, single mothers, older women and women with disabilities, in political and public life, decision-making, education and the labour market;

On harmful practices:

- Take immediate steps to repeal section 2 of the Sterilization Law (which permits the sterilization of women with mental disabilities who have limited legal capacity or who have been deprived of their legal capacity without their consent) and provide effective remedies for women victims of forced or involuntary sterilization;

⁷ [CEDAW Committee, Concluding observations to Finland, 2022](#)

On gender-based violence against women:

- Provide adequate shelters for victims of gender-based violence in all regions, including the Sami homeland, and ensure that all shelters are accessible for women with disabilities;

On employment:

- Develop effective strategies and policies to improve women's access to secure, well-paid jobs with a particular emphasis on disadvantaged groups of women, including migrant women, women from ethnic minority groups, single mothers, older women and women with disabilities;

On disadvantaged groups of women:

- Provide in the next report detailed information on targeted measures to ensure equal rights and opportunities for women who face intersecting forms of discrimination, including migrant women, Roma women, older women and women with disabilities;

Year 2023

Hungary⁸

The CEDAW Committee issued the following recommendations to Hungary.

On access to justice:

- Raising awareness among women and girls, including in rural areas and among Roma women, women with disabilities and older women, on the legal remedies available to claim violations of their rights;

On temporary special measures:

- Take further legal measures, including quotas and other proactive measures, accompanied by time-bound targets, sufficient resources and sanctions for non-compliance, to accelerate the realization of the rights of all women under the Convention, in particular in the areas of access to credit, entrepreneurship, employment in the formal sector and professional occupations in the judiciary and in science, technology, engineering and mathematics, and information

⁸ [CEDAW Committee, Concluding observations to Hungary, 2023](#)

and communications technology, especially with respect to access to decision-making positions in those areas, and to elected and appointed decision-making positions at the provincial and local levels, with particular attention paid to rural women, Roma women and girls, women with disabilities and older women;

On gender-based violence against women:

- Adopt a comprehensive law on gender-based violence against women, in line with general recommendation No. 35 (2017), and the Committee's jurisprudence under the Optional Protocol, which includes a definition of gender-based violence against women, measures and policies aimed at its elimination, institutions responsible for its implementation and coordination mechanisms, and takes into account the special protection needs of disadvantaged and marginalized groups of women, including Roma women, women with disabilities and lesbian, bisexual, transgender and intersex women;

On education:

- Ensure that girls and women belonging to disadvantaged and marginalized groups, such as girls and women with disabilities and Roma, migrant, refugee and asylum-seeking girls and women, and lesbian, bisexual, transgender and intersex girls and women have access to inclusive quality education;

On employment:

- Improve access to employment and training opportunities for disadvantaged and marginalized groups of women, such as Roma women and women with disabilities;

On health:

- Repeal or amend Act CLIV of 1997, by which doctors are allowed to perform forced sterilizations on very wide grounds, and eliminate the possibility of forced sterilization of women with disabilities, as recommended by the Committee on the Rights of Persons with Disabilities in 2022 (CRPD/C/HUN/CO/2-3, para. 36);

On disadvantaged and marginalized groups of women:

- Adopt targeted measures, including temporary special measures, to ensure access to justice, employment and health care, including

sexual and reproductive health services, social protection and food security for disadvantaged groups of women such as rural women, older women, women with disabilities, women belonging to ethnic minority groups, refugee, asylum-seeking and migrant women, taking into account their specific needs;

Slovenia⁹

The CEDAW Committee issued the following recommendations to Slovenia.

On women with disabilities:

- Ensure that all women and girls with disabilities are able to access the labour market, justice, inclusive education, employment and health services, including sexual and reproductive health services;

On temporary special measures:

- Include disadvantaged groups of women, such as refugee and asylum seeking women, women with disabilities and Roma women, in the design, adoption, implementation and monitoring of temporary special measures;

On gender-based violence against women:

- Establish sexual violence referral centres, provide adequate shelters for victims of gender-based violence in all regions and ensure that they meet the accommodation needs of all women victims of violence, including women with disabilities;
- Ensure the collection and analysis of data on all forms of gender-based violence against women and girls, including psychological, economic and domestic violence, as well as cyberviolence and femicide, disaggregated by age, nationality, disability and the relationship between the victim and the perpetrator, and include economic and psychological forms of gender-based violence against women in administrative legislation;

On education:

- Strengthen access for women and girls with disabilities to inclusive education at all levels and include in its next periodic report

⁹ [CEDAW Committee, Concluding observations to Slovenia, 2023](#)

disaggregated data on school enrolment, completion and dropout rates, and access to university education;

On health:

- Ensure that women and girls belonging to disadvantaged groups, such as women and girls with disabilities, have affordable access to health care, including sexual and reproductive health services;

Germany¹⁰

The CEDAW Committee issued the following recommendations to Germany.

On gender-based violence against women:

- Encourage women to report incidents of gender-based violence, including domestic violence, and provide support that is both accessible and adapted to their specific needs, in particular for women and girls with disabilities, trans women and women and girls who do not speak German;
- Monitor and address cases of gender-based violence and abuse in institutions for persons with disabilities;

Slovakia¹¹

The CEDAW Committee issued the following recommendations to Slovakia.

On employment:

- Take all necessary measures, including temporary special measures, to combat the structural barriers faced by women from disadvantaged groups, in particular Roma women, women with disabilities and migrant women, including refugees and asylum-seekers, to secure full and productive employment, decent work and equal pay for work of equal value;

Spain¹²

The CEDAW Committee issued the following recommendations to Spain.

¹⁰ [CEDAW Committee, Concluding observations to Germany, 2023](#)

¹¹ [CEDAW Committee, Concluding observations to Slovakia, 2023](#)

¹² [CEDAW Committee, Concluding observations to Spain, 2023](#)

On temporary special measures:

- Ensure the effective application of Organic Law No. 1/2023 on sexual and reproductive health for vulnerable women, including women with disabilities;

France¹³

The CEDAW Committee issued the following recommendations to France.

On employment:

- Take measures to combat the structural barriers faced by women belonging to disadvantaged groups, such as migrant women, women belonging to ethnic or religious minorities, women with disabilities and older women, and ensure that they have access to formal employment, enjoy decent conditions of work and receive equal pay for work of equal value;

On health:

- Ensure that women with disabilities have adequate access to health services, including sexual and reproductive health services, and train health-care personnel on the specific needs of women and girls with disabilities;

On climate change and disaster risk reduction:

- Integrate a gender perspective into climate change, disaster response and disaster risk reduction legislation, plans, programmes and policies, including its foreign policies, and ensure that women, in particular rural women, women with disabilities, and refugee and migrant women, are consulted in their development and implementation;

On disadvantaged groups of women:

- Develop and strengthen programmes to allow older women to age in their homes and community while being provided with the care they need; ensure that the Labour Code applies to women with disabilities and migrant women in the workplace; and carry out a strategic data collection effort that includes ethnic minorities as a way to address the underrepresentation of women in public life;

¹³ [CEDAW Committee, Concluding observations to France, 2023](#)

Greece¹⁴

The CEDAW Committee issued the following recommendations to Greece.

On women with disabilities:

- Ensure that women and girls with disabilities are able to access justice, inclusive education, employment and health services, including sexual and reproductive health services;

On legislative framework:

- Devise a comprehensive system to collect data on cases of discrimination against women, disaggregated by age, nationality, disability and socioeconomic status;

On temporary special measures:

- Adopt temporary special measures, in line with article 4 (1) of the Convention and the Committee's general recommendation No. 25 (2004) on temporary special measures, to accelerate the substantive equality of women and men, in particular with regard to rural women, women belonging to ethnic minorities, including Roma women and women belonging to the Muslim minority in Thrace, older women and women with disabilities, in all areas under the Convention where women are underrepresented or disadvantaged, including in political and public life, education, employment and health care;

On trafficking and exploitation of prostitution:

- Significantly increase the number and funding of inclusive and accessible shelters for victims of trafficking, including women with disabilities, in both urban and rural areas and ensure that they have access to free legal aid, interpretation, adequate medical assistance, psychosocial counselling, financial support, education, professional training and income-generating opportunities;

On equal participation in political and public life:

- Fully implement the law on temporary special measures and ensure gender equality in lists nominating candidates to international

¹⁴ [CEDAW Committee, Concluding observations to Greece, 2024](#)

bodies and the gender equal representation of women, including rural women, women with disabilities, women belonging to ethnic minorities, including Roma women and women belonging to the Muslim minority in Thrace, in Parliament and municipal councils, the Government, the civil service and the foreign service, in particular at decision-making levels;

- Provide capacity-building on political leadership and campaigning skills, as well as access to campaign financing for women candidates running for public office, in particular rural women, women with disabilities and women belonging to ethnic minorities;

On education:

- Continue to promote the importance of girls' education at all levels, as a basis for their empowerment; reduce illiteracy rates among women and girls, with a focus on rural women, women with disabilities, women and girls belonging to ethnic minorities, including Roma women and girls and women and girls belonging to the Muslim minority in Thrace, and refugee and asylum-seeking women and girls; and take targeted measures, including awareness-raising and special scholarships, to increase enrolment, retention and completion rates among girls and women in secondary and higher education;

On employment:

- Improve access to employment and training opportunities for disadvantaged groups of women, such as women belonging to ethnic minorities, including Roma women and women belonging to the Muslim minority in Thrace, women with disabilities and migrant women;

On health:

- Ensure that women, especially women and girls with disabilities, women in detention and refugee and migrant women and girls, have access to adequate sexual and reproductive health services and information, including safe abortion and post-abortion services and affordable modern contraceptives, to prevent early pregnancy and sexually transmitted infections;

On economic empowerment of women:

- Strengthen efforts to reduce poverty among women, with a particular focus on disadvantaged groups of women, such as women with disabilities and women belonging to ethnic minorities, including Roma women and women belonging to the Muslim minority in Thrace, promote their access to low-interest loans without collateral and their participation in entrepreneurial initiatives to empower them economically and provide them with opportunities to acquire the necessary skills to fully participate in economic life;

On disaster risk reduction and climate change:

- Increase climate change and disaster risk management literacy and awareness among communities, women and girls, including rural women and women with disabilities, to empower them with knowledge to demand their rights and effectively participate in climate change-related decision-making and the development of adaptation and loss and damage strategies and actions that build women's and girls' resilience to the impact of climate change;

Italy¹⁵

The CEDAW Committee issued the following recommendations to Italy.

On women with disabilities:

- Further strengthen targeted measures to ensure that women and girls with disabilities have access to inclusive education, formal employment, health services and decision-making processes. It also recommends that the State party recognize the legal capacity of women and girls with psychosocial disabilities, which should only be revokable by court decision in exceptional cases and subject to strict safeguards, and remove the barriers that they face in access to justice, such as a lack of information in accessible formats on their human rights and the remedies available for claiming them;

On legislative framework:

- Mobilize political support for and resubmit the Zan bill amending article 604 bis of the Criminal Code to criminalize discrimination and

¹⁵ [CEDAW Committee, Concluding observations to Italy, 2024](#)

violence based on sex, gender, sexual orientation, gender identity and disability to the Senate for approval;

On access to justice:

- Expand and adequately fund public legal aid services to ensure access to free legal aid to women without sufficient means, in particular rural women, women with disabilities, migrant, asylum-seeking and refugee women and Roma, Sinti and Caminanti women, in criminal, civil and administrative proceedings relating to gender-based violence and discrimination against women;

On stereotypes:

- Take resolute measures to counter hate speech against lesbian, bisexual, transgender and intersex women and girls and women and girls with disabilities and promote the use of gender-sensitive language in the media, including by holding social media platforms accountable for user-generated content;

On gender-based violence against women:

- Encourage the reporting of gender-based violence against women and girls, including women with disabilities, rural women and refugee, asylum seeking and migrant women, by enhancing awareness-raising on the criminal nature of gender-based violence against women and challenging its social legitimization and destigmatizing and protecting women from reprisals for reporting incidents of gender-based violence;
- Adequately fund victim support services, including by subsidizing shelters run by non-governmental organizations, and expand the network of specialized, inclusive and accessible shelters for women and girls who are victims of gender-based violence, taking into account the specific needs of women and girls with disabilities, and ensure that victims have access to psychosocial counselling, financial support, education, professional training, income generating activities, affordable housing and, if necessary to ensure their safety, a new identity;
- Ensure the systematic collection of data on the incidence of all forms of gender-based violence against women and girls, including domestic violence, forced sterilization, cyberviolence and femicide,

disaggregated by age, region, disability and the relationship between the victim and the perpetrator, covering all regions of the country.

On health:

- Strengthen women's access to health services, including sexual and reproductive health services, especially in rural and remote areas, with a special focus on rural women, women living in poverty, women with disabilities, women belonging to ethnic minorities, such as Roma, Sinti and Caminanti women, refugee, asylum-seeking and migrant women and lesbian, bisexual, transgender and intersex women;
- Ensure that women and girls with disabilities, including women and girls with intellectual and psychosocial disabilities, have adequate access to health-care services, including sexual and reproductive health services, and health information in accessible formats and provide capacity-building to health-care personnel on the right of women and girls with disabilities to decide autonomously on matters relating to their health;

Estonia¹⁶

The CEDAW Committee issued the following recommendations to Estonia.

On legislative framework:

- Devise a comprehensive system to collect data on the number and outcome of complaints about discrimination against women, including on the reparation provided to victims, disaggregated by age, nationality, disability and socioeconomic status;

On access to justice and legal complaint mechanisms:

- Ensure access to justice and redress for disadvantaged groups of women, such as women with disabilities, migrant or refugee women, lesbian, bisexual, transgender and intersex women and women from ethnic minority groups, including through the collection of data and regular monitoring and evaluation of the outcomes of the provision of services for access to justice and redress;

¹⁶ [CEDAW Committee, Concluding observations to Estonia, 2024](#)

On temporary special measures:

- Carry out awareness-raising campaigns to promote understanding of the importance and non-discriminatory nature of temporary special measures and that put in place temporary special measures, such as quotas, in line with article 4 (1) of the Convention and the Committee's general recommendation No. 25 (2004), to accelerate the achievement of substantive gender equality in the areas of decision-making, education and employment, where women are underrepresented or disadvantaged, in particular rural women, migrant or refugee women, women with disabilities and women from ethnic minority groups;

On gender-based violence against women:

- Strengthen capacity-building for the police and other law enforcement officers on the prompt and gender-sensitive investigation of complaints about gender-based violence, address victim-blaming beliefs and judicial gender bias and equip law enforcement personnel with the necessary skills to deal with all women victims of gender-based violence, including women with disabilities, lesbian, bisexual, transgender and intersex women and women belonging to ethnic minorities;

On equal participation in political and public life:

- Appoint equal numbers of women and men to leadership positions, including in the foreign service as ambassadors or diplomats, and in all spheres of the Government, local administrative bodies, the judiciary and State-owned companies, and increase the representation of women, in particular rural women, women belonging to ethnic and linguistic minorities and women with disabilities, in political and public life;
- Collect disaggregated data on the representation of women, including disadvantaged groups of women such as rural women and women with disabilities, in the judiciary, State-owned companies and the media, especially at decision-making levels;

On economic and social benefits and economic empowerment of women:

- Support women entrepreneurs, including rural women and women with disabilities, through enhanced finance schemes for businesses, including loans for start-ups, venture capital, technology and capacity-building for launching small- and medium-sized enterprises;

On climate change:

- Assess the economic impact of the green transition, in particular on rural women, women living in poverty, women with disabilities and single women heads of households, in order to devise measures to compensate for any undue economic hardships;

Year 2025

Luxembourg¹⁷

The CEDAW Committee issued the following recommendations to Luxembourg.

On women with disabilities:

- Ensure that women and girls with disabilities have access to justice, the labour market, inclusive education, employment and healthcare services, including sexual and reproductive healthcare services, and are able to fully exercise their right to bodily autonomy and decision-making with regard to their reproductive rights and custody and care of their children;
- Ensure the next national action plan for the implementation of the convention on the rights of persons with disabilities includes a gender dimension and that the national action plan for equality between women and men is revised to incorporate a disability dimension;

On constitutional and legislative framework and definition of discrimination against women:

- Collect data disaggregated by sex, age, disability, nationality, racial origin, religion and socioeconomic background, in order to

¹⁷ [CEDAW Committee, Concluding observations to Luxembourg, 2025](#)

accurately assess the situation of women and girls and formulate specific policies in those areas of the Convention where needed;

On women's access to justice:

- Address the obstacles faced by women victims of gender-based violence, discrimination or abuse in accessing justice, with a particular focus on foreign women and women with disabilities;

On harmful practices:

- Explicitly prohibit the non-consensual administration of contraceptives, medical treatments or sterilizations to women and girls with disabilities, in particular those with psychosocial disabilities;

On gender-based violence against women:

- Incorporate an intersectional approach into all strategies to combat gender-based violence against women, to include women with disabilities and asylum-seeking and migrant women;

On education:

- Adopt a gender-sensitive approach to career guidance, including on the basis of role models, in order to encourage girls to enrol in traditionally male dominated fields of study, such as mathematics, information technology and science, and pursue non-traditional career paths; train teachers at all levels of the educational system on ways to prevent stereotyping; and collect data disaggregated by sex, age, disability, nationality, racial origin, religion, socioeconomic background and other relevant factors on women and girls enrolled in the areas of science, technology, engineering, mathematics and construction, at the tertiary level;
- Strengthen measures to meet the educational needs of girls and women with disabilities, and those that are living in poverty, migrants, refugees and asylum-seekers and provide in its next periodic report information and statistical data on the education of all the above-mentioned disadvantaged groups of girls and women;

On employment:

- Review the Act of 12 September 2003 on persons with disabilities, with a view to removing the exclusion provision;

On data collection and analysis:

- Promote and build capacity for the use of the most appropriate technology in the collection of statistical data, including on the prevalence of gender-based violence against women, the prevalence of trafficking in women and girls, access to education and the socioeconomic status of women, that is disaggregated by age, disability, sexual orientation, socioeconomic background and other relevant factors, in order to accurately assess the situation of women and girls and allow for the design and implementation of tailored and gender-responsive legislation, policies, programmes and budgets.

Annex II

This annex compiles some of the recommendations of the GREVIO (Group of Experts on Action against Violence against Women and Domestic Violence, responsible of monitoring the implementation by the parties of the Council of Europe Convention on preventing and combating violence against women and domestic violence ([Istanbul Convention](#))), addressed to the EU member states, regarding women and girls with disabilities.

The overall GREVIO country-monitoring work can be consulted accessing [this link](#).

Year 2020

Belgium

- Adapt awareness raising (media, images, language, etc.) to the needs of women victims and in particular the most vulnerable groups such as women with disabilities;
- Ensure that the existing provisions on forced abortion and forced sterilisation are able to protect women with disabilities against this form of violence, as required by Article 39 of the Istanbul Convention.
- Collect of data and the promotion of research on violence against women which highlights the situation of women victims according to the different grounds of discrimination (such as age, disability, national or social origin, migrant or refugee status, sexual orientation, gender identity).

Croatia

- Take measures to ensure that the provisions of the Istanbul Convention are implemented without discrimination on any of the grounds listed in Article 4, paragraph 3, including on the basis of association with a national minority, state of health and disability;
- Promote research and ensure the collection of data on gender-based violence affecting groups of women who are, or may be, exposed to intersectional discrimination, including women with disabilities, migrant women, women with addiction issues and Roma women, so as to assess the prevalence of the various forms of violence and the access by such groups to support services, protective measures and justice;
- Examine, through research, all forms of violence against women, including sexual violence, stalking, sexual harassment, female genital mutilation and forced marriage, as well as women's experiences with support services, and violence affecting vulnerable groups of women, including, but not limited to, women and girls with disabilities, LGBTI women, elderly women and migrant women;
- Ensure that professionals of all relevant institutions take a more proactive approach to informing victims and to secure a wider dissemination of information about the support services and legal measures available to victims of domestic and other forms of violence against women, in a language they understand and in formats that are accessible for victims with disabilities;
- Ensure that shelters are available in an adequate geographic distribution and accessible to all women, including women with disabilities, women from minority backgrounds, migrant women with irregular status and other women who are at risk of intersectional discrimination;
- Review the obligation for professionals, including those working at the sexual violence referral centres, to report cases of violence against women, other than in situations in which there are reasonable grounds to believe that a serious act of violence covered by the scope of the Istanbul Convention has been committed and

further serious acts are to be expected. This may well require making the obligation to report contingent upon the prior consent of the victim, unless the victim is a minor or is unable to protect her/himself due to intellectual disabilities;

- Review the obligation for professionals, including those operating in NGOs, to report cases of violence against women and their children, other than in situations in which there are reasonable grounds to believe that a serious act of violence covered by the scope of the convention has been committed and further serious acts are to be expected. This may well require making the obligation to report contingent upon the prior consent of the victim, unless the victim is a child or is unable to protect her/himself because of disabilities.

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