



COFACE FAMILIES EUROPE RESPONSE TO THE  
PUBLIC CONSULTATION:  
REVIEWING THE EUROPEAN DISABILITY STRATEGY  
2010-2020

OCTOBER 2019



## COFACE analysis of the European disability strategy 2010-2020

COFACE Families Europe represents 58 family organisations active in 23 EU Member States, working on a number of areas, including disability. The advocacy work of COFACE Families Europe in the area of disability focuses on ensuring that persons with disabilities and their families are fully included in their communities.

We advocate for the recognition and social protection of and services to support family carers, providing the 80% of long-term care in Europe, (see our European Charter for Family Carers), and for the transition from institutional to community-based settings in the social/health sector.

The European disability strategy 2010-2020 (EDS) has the objective to implement the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and to “empower people with disabilities so that they can enjoy their full rights, and benefit fully from participating in society and in the European economy.” The EDS provided a framework for proposing policies and legislations that would promote and protect the rights of persons with disabilities within and outside the EU.

However, the proposals based on the eight action areas of the Strategy have not always led to ambitious policies, nor have led to the rights of persons with disabilities to be fully mainstreamed in all EU actions. There is been also minimal coordination among the EDS and the EU’s economic strategy (Europe 2020), the EU’s economic governance (the European Semester) and EU funding (e.g. ESF, ERDF, Erasmus+, etc.).

In the last two years, the EU’s economic strategy and governance had better inclusion of disability issues, but this is more related to the adoption of the European Pillar of Social Rights than to an effort in the implementation of the EDS, which was in place since 2010.



In terms of legislation, the European Accessibility Act is the main initiative adopted in the framework of the EDS; it ensures better accessibility of many products and services that citizens use every day, such as phones, transport or banking services, and will thus improve the inclusion of persons with disabilities in society. Nevertheless, it is clear that the implementation of the UN CRPD is still far from being achieved.

The EDS has general approach towards disability, which risks to fail in recognising that different disabilities face different barriers, and have different support needs and to underestimate the needs of some persons with disabilities. Visible disabilities and the barriers that that persons with them face (e.g. accessibility and mobility) tend to be the primary focus of broad disability policies. Such policies, in turn, might fail to adequately address the needs and barriers faced by persons with invisible disabilities, and of persons with multiple severe disabilities, which need a higher level of support, often provided by their family members with high costs in terms of time, money and health.



## Our proposals for the next decade

COFACE Families Europe calls for the renewal of the EU commitment to the promotion and protection of rights of persons with disabilities and their families by adopting a comprehensive post-2020 European disability strategy that continues supporting persons with disabilities and their families, and has:

- Alignment and coordination with the Sustainable Development Goals, with the European Pillar of Social Rights and with the European Semester process;
- An adequate budget allocated for the implementation of the Strategy at national and European level and comprehensive objectives with clear benchmarks and indicators;
- An adequate and well-resourced monitoring mechanism with concrete targets, including the family dimension of disability and access to long-term care and community-based services among the indicators;
- Disability focal points in all relevant Directorates of the European Commission and relevant EU institutions and agencies;
- An interinstitutional coordination mechanism;
- Continue to mainstream disability in all policy areas, such as gender equality policy, and adapt to emerging policy areas, such as refugees and migrants with disabilities, legal capacity and supported decision-making and new technologies;
- A plan on the rights of family carers, including actions towards, their recognition, social protection, social inclusion, respite and right to choice, according to the European Charter for Family Carers;
- Attention to the special needs of children with disabilities and their families, in order to prevent all forms of mistreatment or violence and promotion of inclusive education for children with disabilities, starting from early child education and care;
- A European initiative on long-term care, stating the key principles and evidence-based recommendations for the development of long-term care and support services across the EU and the key quality principles to be ensured;



- Go further in ensuring that EU funds are not invested in the construction or refurbishment of institutional care settings and in funding the transition to community-based care ensuring independent living and social inclusion of persons with disabilities and their families;
- A plan for research and social innovation on the different types of services that are offered and needed, including home-based support, based on the voluntary European Quality Framework for Social Services, including the criteria of participation and quality of life of the service users;
- Concrete actions across policy areas that have an impact on the access to quality care services, including working conditions in the sector and access to support services to disabled and older people in need of care;
- A plan for better access to health care systems;
- A plan to address problems of mobility within the EU for persons with disabilities and their families and ensure their full participation in cultural life, recreation, leisure and sport;
- Make sure all persons with disabilities and their families have access to and, when necessary, support to afford, any assistive technology that best meets their needs;
- Plans for legislation on non-discrimination on the basis of disability, including the recognition of the denial of reasonable accommodation as forms of discrimination on the ground of disability, multiple and intersectional discrimination, and discrimination by association;
- Information and awareness raising campaigns on the rights of persons with disabilities and their families;
- Sufficient structured dialogue with persons with disabilities, their families, and their representative organisations;
- Support organisations of persons with disabilities and their families to be further engaged in policy and advocacy work in the EU and in international cooperation, in line with General Comment No. 7 of the CRPD Committee.



Using the UNCRPD and the 2030 Sustainable Development Goals as the guiding vision, COFACE is finalising its S.H.I.F.T. Guide. It will highlight objectives, tools, and actions that different actors in society can use to contribute to a human rights-based and sustainable shift towards meaningful inclusion of persons with disabilities and their families. Deinstitutionalisation refers to the whole process of putting inclusion and respect of human rights at the centre of all policy actions towards persons with disabilities, from birth to old age. This means developing a range of support person-centred services in the community, having efficient ways to monitor the respect of human rights, making the mainstream sector inclusive and accessible, empowering the families of persons with disabilities, and driving a cultural shift to embrace inclusion as an overarching value in society.

COFACE Families Europe and its members fully support the European Commission's commitment to the rights of persons with disabilities through the Strategy and welcome the progress achieved so far. We consider the European disability strategy 2010-2020 as a first step that will lead to more ambitious post-2020 commitments. We are willing to represent families in this process and contribute to its design, implementation and evaluation.

For further information you can contact our policy and advocacy officer  
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