IMPROVING SERVICES
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Response to the public consultation for a new EU Disability Strategy 2010-2020

22nd December 2009

EASPD
European Association of Service providers for People with Disabilities
Avenue d'Auderghem 63
B-1040 Brussels
ID: 13727511526-58

Introduction

EASPD is the European Association of Service providers for Persons with Disabilities and promotes the equalisation of opportunities for people with disabilities through effective and high quality service systems in Europe. EASPD represents over 8,000 service provider organisations across Europe and across disability.

EASPD would support a new Disability Strategy that will facilitate the full implementation of the UN Convention on the Rights of Persons with Disabilities across Europe and that will provide for a wide framework which is clear and binding for all involved parties, creating impetus for progress across all European Commission services and European institutions.

What items should the new Disability Strategy address?

EASPD believes that there is much to build on in the previous EU Action Plan that is now coming to an end, and that there are several priority areas that should be addressed at European level, to ensure that people with disabilities in Europe, as full citizens, can enjoy their equal rights and their entitlement to dignity, equal treatment, independent living and full participation in society.

1. **Enhancing the understanding of the situation of people with disabilities in the EU**, by using the resources of ANED and Eurostat to promote data collection and analysis of the evolving needs of disabled people, and their quality of life by looking at availability of support, benefits systems, waiting list, etc. Eurostat should take into consideration disability dimensions in all research it carries out. Indicators and target should be determined so as to measure the improvements of the situation of disabled people across the Union.

2. **Governance and management of disability policies**: EASPD stresses the need to assign clear political responsibility for disability **at all levels of governance**. The Disability Strategy should be owned at all levels, from local to EU and international, to ensure that there is strong political backing and support in order to achieve concrete results. EASPD also encourages the **coordination of Action Plans and disability**

policies across the 27 Member States to make sure that all efforts are made to reach common goals. The **High Level Group on Disability** is in a unique position to coordinate these efforts and could play a stronger role in ensuring that all initiatives stemming from the EU level are known, understood and supported in each and every Member State. EASPD encourages the Commission to coordinate its work in this field with other international organisations, such as the Council of Europe.

3. **Mainstreaming of disability issues and governance in EU Institutions**: EASPD stresses the importance of addressing disability issues not with a single, specific European policy but rather by ensuring that they are included in all policies that are relevant to disability. Resources dedicated to disability within funding streams should be identified more clearly and disability objectives should be consistently represented in agenda-setting. Furthermore, disability issues should be mainstreamed not only across institutions but across all DGs of the European Commission.

4. A strong legal instrument on **anti-discrimination,** such as the proposed "article 13" Directive, is required to ensure people with disabilities can enjoy their rights fully. We call on the Commission to include the development of such a framework in the new Disability Strategy.

5. As made clear in recent research, disability **is an important risk factor endangering health conditions**. Moreover, **access to high quality health services is not always available** to disabled patients to the same extent as it is available to the general public. EASPD also calls on the **eradication of health inequalities between people with disabilities and the general population**, as well as within different groups of people with disabilities, i.e. paying special attention to people who are at risk of multiple discrimination, for example migrants with disabilities, women with disabilities.

6. A multi-annual action plan on **de-institutionalisation and the reform of institutionalized care** should be developed, to put in place the recommendations outlined in the Report of the Ad Hoc Expert Group on the Transition from Institutional to Community-based Care. EASPD calls on the European Commission to follow the recommendations outlined in the report: to present a Communication on the transition from institutional to community-based care; to build the Common Basic Principles into all the relevant EU policies; to provide guidelines on the use of EU Structural Funds and other funding instruments, including those intended for development and humanitarian work, for de-institutionalisation; to promote and facilitate exchange of models of good practice in this area; to establish a pool of independent experts on the issue; to improve the knowledge base by defining a minimum data set for residential services; to fund research in this area; to raise the issue of investing into community-based care in the debate on the future of Cohesion Policy after 2013; and to raise awareness of the issue within the Commission itself.

EASPD – European Association of Service providers for Persons with Disabilities
Oudergemselaan 63 Av. D'Auderghem
B -1040 Brussels
Website: www.easpd.eu
Miriana Giraldi
Tel: +32 2 282 46 11
Fax: +32 2 230 72 33
E-mail: miriana.giraldi@easpd.eu

7. **EASPD calls on the Commission to address the specific situation of people with high dependency needs**, by promoting the collection of data (via Eurostat and ANED), setting indicators on quality of life, and benchmarking on available support models. People with high dependency needs are the most vulnerable, the most excluded and those whose support is most expensive. Research and data collection will facilitate the design of policies that will **address their specific situation in the most suitable way**. This could also prove to be a powerful benchmarking tool, since policies that will be suitable for the most vulnerable in society will be suitable for all other citizens, too.

8. EASPD believes that a **positive approach towards inclusive education** should be developed at European level. EASPD calls on the European Commission to promote educational policies and strategies that clearly state inclusive education as a goal. The main objective of inclusive education should be **to provide a school with good learning results** with the participation of all stakeholders and where all learners are treated equally. An action plan to reform existing education systems should be proposed, and education should become more individualized and needs based in general.

   EASPD also recommends setting **clear standards and targets for lifelong learning** and promoting the participation of all groups of the population in LLL schemes. We recommend reinforcing the role of the European Commission as a coordinator in promoting the exchange of good practice.

9. EASPD believes that **all people with disabilities have the right to equal work opportunities in inclusive and supportive environments**. Only about 20% of people with disabilities are currently employed, and this figure has not improved over the past 10 years. We recommend the public sector in general and the **European Institutions in particular to lead by example and increase the number of work places available to people with disabilities**, and employment in the private sector should be promoted through active encouragement and incentives and support measures to make workplaces more accessible.

   EASPD puts forward the **STAR Recommendations** as a successful approach to designing effective employment strategies for people with disabilities. This model is based on stakeholder co-operation, targeted actions, availability of support and research.

   In order to facilitate an increase in the number of persons with disabilities in employment, the problems of the **benefit trap** must actively be tackled.

10. EASPD calls on the Commission to promote the delivery of high quality services to all people with disabilities in Europe, and to facilitate this by **ensuring that the necessary pre-conditions are in place**: a clear and stable legal framwework; sustainable funding; the availability of a well trained work force; and availability of services for all people who need them.

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E-mail: miriana.giraldi@easpd.eu

Conclusions:

EASPD hopes that the Commission will address the key priorities outlined in this response and that it will adopt a Disability strategy that is far reaching, ambitious and that encompasses different areas of action to ensure that people with disabilities across the EU can fully realise their rights.

Based on the priorities outlined in this paper, EASPD suggests to the Commission the following **strategic choices**:

1. To **mainstream disabilities** in all policies and actions it undertakes with the objective of creating a more accessible, welcoming and inclusive society for all European citizens, both at a horizontal level (across institutions and DGs), and at a vertical level (across all levels of governance, from local to international). For example, ICT and AT should be developed according to the principles of universal design so as not to create new barriers.

2. **To develop specific action plans** when necessary to address particular situations, such as:

    a. Health inequalities;
    b. De–institutionalisation (also in the education sector);
    c. The set up of a structural stakeholder co-operation to address employment of people with disabilities;
    d. People with high dependency needs.

3. To take adequate measures to ensure **availability, accessibility and affordability of support services** for all people with disabilities across the EU. In this respect, special attention should be paid to address the needs of people liable of **multiple discrimination** (e.g. migrants with disabilities, etc.), to ensure that **services are of high quality**, and that **pre-conditions** for the delivery of these high quality services are met.

Attachments:

- EASPD Thessaloniki Declaration on Employment;
- EASPD Dublin Manifesto on Inclusive Education;
- STAR Recommendations;
- Report of the Ad Hoc Expert Group on the Transition from Institutional to Community-based Care.

EASPD, 22nd December 2009

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