

# CONTRIBUTION N.º 1/ME-CDPD/2026

**Public Consultation – Enhancing the European Strategy for the Rights of Persons with Disabilities 2021–2030**



**MeCDPD**  
**Mecanismo Nacional**  
de Monitorização da Implementação da Convenção  
sobre os **Direitos das Pessoas com Deficiência**



## **CONTRIBUTION No. 01/Me-CDPD/2026**

Lisbon, 5 February 2026

### ***Contribution of the Me-CDPD within the framework of the public consultation on the European Strategy for the Rights of Persons with Disabilities 2021-2030 (strengthening action towards 2030)***

#### **1. Institutional, normative and conventional framework**

The National Monitoring Mechanism for the Implementation of the Convention on the Rights of Persons with Disabilities (Me-CDPD), in Portugal, hereby submits this contribution within the framework of the public consultation on strengthening the European Strategy for the Rights of Persons with Disabilities 2021-2030.

The central focus of this contribution is to reinforce, within the framework of the renewed European Strategy, the obligations concerning data collection, statistics, monitoring, transparency and impact evaluation of public policies addressing persons with disabilities, in accordance with Article 31 – Statistics and Data Collection of the Convention on the Rights of Persons with Disabilities (CRPD), as well as other relevant provisions and the UN Committee’s General Comments.

In particular, this contribution focuses on:

- the need for reliable, disaggregated and comparable data to understand the situation of persons with disabilities;
- strengthening accountability and transparency;
- adopting a disability-inclusive budgeting approach;
- implementing human-rights-based impact assessment models;
- supporting EU Member States in designing and implementing National Strategies and Action Plans aligned with the CRPD, the European Strategy and the 2030 Agenda for Sustainable Development (SDGs).

Throughout its work, the Me-CDPD has consistently highlighted that effective public policies depend on reliable data, participatory accountability mechanisms, and accessible and transparent information regarding investment and outcomes.



The strengthening of the European Strategy should therefore place at its core:

- a robust European disability data architecture, aligned with the CRPD;
- inclusive budgeting and traceability of public investment;
- human-rights-based impact evaluation, using structural, process and outcome indicators.

This approach is consistent with the already identified need at European level to strengthen monitoring, progress measurement and governance of the Strategy, including the use of disaggregated and comparable data across Member States.

## **2. Normative basis and international framework**

### **2.1. Article 31 CRPD – Statistics and data collection**

Article 31 of the CRPD obliges States Parties to collect appropriate information, including statistical and research data, to:

- formulate and implement policies;
- monitor implementation of the CRPD;
- identify and remove barriers;
- ensure appropriate data disaggregation.

The Office of the United Nations High Commissioner for Human Rights clarifies that Article 31 requires data to be reliable, methodologically robust, comparable over time and across countries, accessible and transparent, and, crucially, effectively used to formulate, implement and evaluate public policies and monitor the realisation of the rights of persons with disabilities.

### **2.2. Related CRPD provisions and General Comments**

Data collection under Article 31 constitutes a cross-cutting obligation for the implementation of the CRPD, essential to measure progress, identify inequalities and ensure accountability mechanisms. The following provisions are directly linked to the need for disaggregated data, monitoring and impact assessment:

#### **Article 4 – General obligations**

Requires States Parties to adopt legislative, administrative and policy



measures to implement the Convention. Evidence-based policymaking requires robust and comparable data, making Article 31 operational for fulfilling general obligations.

### **Article 5 – Equality and non-discrimination**

Preventing discrimination requires identifying real inequalities through disaggregated data, including intersectional factors, to assess disparities in access to rights, services and opportunities.

### **Article 6 – Women and girls with disabilities**

Implementation depends on disaggregated data by gender and disability to identify multiple discrimination and guide evidence-based policy responses.

### **Article 9 – Accessibility**

Monitoring accessibility requires measurable indicators and comparable data to evaluate the removal of barriers and effectiveness of accessibility policies.

### **Article 12 – Equal recognition before the law**

Implementation requires data on supported decision-making, safeguards and the exercise of legal capacity, enabling assessment of the transition from substituted to supported decision-making regimes.

### **Article 13 – Access to justice**

Monitoring requires data on participation of persons with disabilities in judicial proceedings, procedural accommodations, accessibility of courts and training of justice professionals.

### **Article 16 – Freedom from exploitation, violence and abuse**

Requires disaggregated data on violence against persons with disabilities (by gender, age, type of disability and context) to identify risk patterns and guide prevention, protection and redress mechanisms.



## **Article 19 – Living independently and being included in the community**

Implementation requires data on institutionalisation, access to community-based services, support needs and autonomy, enabling monitoring of deinstitutionalisation.

## **Article 24 – Education**

Monitoring inclusive education requires data on access, retention, attainment, support measures, resources and inclusive capacity of education systems.

## **Article 27 – Work and employment**

Requires data on labour market participation, wage gaps, discrimination, reasonable accommodation and quality of employment.

## **Article 33 – Implementation and monitoring**

Requires States Parties to establish monitoring frameworks, including participation of persons with disabilities and their representative organisations. Effective monitoring depends on reliable, comparable and disaggregated data.

### **Relevant General Comments:**

- *General Comment No. 6* clarifies that States must collect and analyse disaggregated data to identify structural inequalities and monitor anti-discrimination policies.
- *General Comment No. 7* establishes that persons with disabilities and their representative organisations must participate meaningfully in data production, analysis and monitoring processes.

### **2.3. Human rights indicators and the 2030 Agenda**

Monitoring of the CRPD should rely on:

- structural indicators;
- process indicators;
- outcome indicators.

The strengthened Strategy should align with the SDGs and promote



internationally comparable data and good practices.

### **3. Structural challenge: a data deficit undermines rights**

Despite normative progress, structural limitations persist in disability data systems across the EU, including:

- lack of comparability;
- insufficient data disaggregation;
- weak traceability of public investment;
- absence of systematic impact evaluation;
- statistical invisibility of vulnerable groups.

These limitations directly affect the realisation of rights, leading to weak monitoring, reduced transparency, fragile accountability and risk of ineffective or discriminatory policies. A data deficit is therefore a structural rights deficit.

## **4. Recommendations of the Me-CDPD**

### **4.1. European commitment on data and accountability**

Promote national disability data strategies, regular public reporting, a common indicator framework and comparable monitoring across Member States.

### **4.2. Harmonisation of data instruments**

Promote systematic use of internationally recognised tools such as the Washington Group Short Set and the Child Functioning Module.

### **4.3. Robust data disaggregation**

Ensure disaggregation by gender, age, territory, support needs, socioeconomic status, living context and intersectional factors.

### **4.4. Inclusive budgeting and investment traceability**

Promote disability-inclusive budgeting, transparent reporting and linking financial investment to real-life impact.

### **4.5. Technical and financial support to Member States**



Strengthen technical assistance, funding for data systems, and support for CRPD-aligned national strategies.

#### **4.6. Human-rights-based impact evaluation**

Use structural, process and outcome indicators to measure real impact.

#### **4.7. Data governance and participation**

Ensure participation, accessibility, transparency, ethical standards and data protection.

### **5. Conclusion**

The strengthened European Strategy must evolve into an evidence-based, impact-oriented and accountable framework, fully aligned with Article 31 CRPD.

It should:

- reinforce the European disability data architecture;
- ensure transparency and accountability;
- promote inclusive budgeting and impact evaluation;
- support Member States in implementing the CRPD;
- strengthen monitoring through human rights indicators;
- align with the Sustainable Development Goals.

Without data there is no visibility; without visibility there is no priority; without priority there is no rights-based investment; and without evaluation there is no guarantee of effectiveness. The strengthened Strategy must therefore ensure a robust data, monitoring and evaluation architecture capable of transforming legal commitments into measurable, verifiable and tangible outcomes in the lives of persons with disabilities across the European Union.

**Vera Bonvalot, President of Me-CDPD**



## **6. References**

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