



EDF alternative report to GREVIO

European Disability Forum alternative
report

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Alternative report for the GREVIO baseline evaluation
procedures in respect of the EU



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Introduction

This document gives information to the Group of Experts on Action against Violence against Women and Domestic Violence of the Council of Europe (GREVIO) for its first evaluation of the European Union. It focuses on the situation of women and girls with disabilities.

About the European Disability Forum (EDF)

We are an independent NGO that represents the interests of over 100 million Europeans with disabilities, 60% of them being women and girls with disabilities. We bring together representative organisations of persons with disabilities from across Europe and are run by persons with disabilities and their families.

We are committed to gender equality and women's rights. The [EDF Women's Committee](#) is the main decision-making bodies when it comes

to gender equality and women's rights policy. The Committee mainstreams gender in all EDF policies and documents, raise awareness on the situation of women and girls with disabilities and work towards the inclusion of women and girls with disabilities in society.

The EDF Women's Committee also supports EDF participation in the [European Women's Lobby \(EWL\)](#). We have been member of EWL since 2000.

Women and girls with disabilities in Europe

Women and girls with disabilities constitute 29.2%¹ of the total population of women in the European Union (EU). They are more likely to face multiple and intersectional discrimination in all areas of life, including, socio-economic disadvantages, social isolation, violence against women, forced sterilisation and abortion, lack of access to community services, low-quality housing, institutionalisation, inadequate healthcare and denial of the opportunity to contribute and engage actively in society.

Women with disabilities are two to five times more likely to face violence. The status of women and girls with disabilities is not only worse than that of women without disabilities but also worse than that of their male peers. This is especially so in rural areas with fewer services and opportunities for this group than in urban environments.

EU obligations to ensure the rights of women and girls with disabilities under the UN Convention on the Rights of Persons with Disabilities

In addition to their obligations under the Istanbul Convention, the EU and all its Member States have obligations to ensure the rights of women and girls with disabilities, and to prevent violence against them, under the UN Convention on the Rights of Persons with Disabilities ([CRPD](#)). This is

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

important for the GREVIO to know in the context of the EU evaluation, but also national evaluations.

The CRPD is an international human rights treaty ratified by the EU and all its Member States. It commits all who ratify it to implement and promote the full realisation of all human rights for all persons with disabilities through the adoption of new political tools and review of existing policies.

Equality between men and women is a general principle of the CRPD (Article 3). In addition, article 6 of the Convention specifically recognises that women and girls with disabilities are subject to multiple discrimination and requires States parties to “take measures to ensure the full and equal enjoyment by them of all human rights and fundamental freedoms” and “ensure the full development, advancement and empowerment of women, for the purpose of guaranteeing them the exercise and enjoyment of the human rights” set out in the Convention. Furthermore, article 16 of the CRPD requires States parties to ensure the “freedom from exploitation, violence and abuse” for all persons with disabilities, including women and girls with disabilities, and article 17 to protect their integrity, under which is covered issues such as forced sterilisation. All of the CRPD has to be implemented in light of the CRPD Committee’s [General Comment No. 3 on women and girls with disabilities](#).

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 related to women and girls with disabilities (article 6 CRPD):

- 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 expressed the following concerns:

- 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.

For more information, you can consult EDF [position paper on violence against women and girls with disabilities in the European Union](#) (2021).

GREVIO questionnaire on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) as adapted for the European Union

Below we provide information and reply to some of the questions included in the questionnaire, based on our knowledge of the situation of women and girls with disabilities in the EU.

II. Integrated policies and data collection (Chapter II of the convention, Articles 7 to 11)

Integrated policies

Q: Please provide information on the adoption of comprehensive and co-ordinated policies on violence against women, the financial resources dedicated to the implementation of these policies, and support of the work of international organisations, states, NGOs and other civil society actors, in particular women's organisations, the establishment of effective cooperation with these organisations, as well as data collection.

The EU has not adopted a specific policy framework or strategy fully dedicated to combating violence against women and domestic violence. Below we cover the EU policy framework on gender equality, which includes some actions on violence against women. We also provide information on the Anti Trafficking Strategy and the Victims' Rights Strategy which are important policy documents but do not fully focus on the gender perspective. Information about EU law on combating violence against women is available under the section on Substantive Law.

EU Roadmap on Women's Rights

The European Commission's President Ursula Von Der Leyen announced a new Roadmap for Women's Rights in [her political guidelines for the European Commission 2024-2029](#). The [EU Roadmap for Women's Rights](#) was presented on the occasion of the International Women's Day 2025.

We recognise that the EU Roadmap for Women's Rights is an important political declaration in the face of increasing pushback against women's rights. However, even though we called on Commissioner for Equality Hadja Lahbib and the relevant services in the European Commission to [ensure the Roadmap explicitly includes women with disabilities](#), we seemed to have been left behind.

- The Roadmap was an occasion to work towards an inclusive future, highlighting intersectionality and putting women in all their diversity at the heart of key policies enhancing their rights. However, it lacks fundamental actions to protect marginalised groups, including the rights of women and girls with disabilities. The Roadmap makes no reference to the CRPD and provide for no actions to ban and end forced sterilisation of women with disabilities, and to ensure ambitious transposition and implementation of the Directive on combating violence against women, and of the Istanbul Convention.

EU Gender Equality Strategy 2020-2025

The current [Gender Equality Strategy 2020-2025](#) will expire at the end of this year. The Strategy produced good results in terms of ending gender-based violence, in particular it led to the adoption of the [Directive on combating violence against women and domestic violence](#) in 2024, and to the ratification of the Istanbul Convention by the EU. However, more has to be done, especially when it comes to women and girls with disabilities. For example, there is no prohibition of forced sterilisation against women and girls with disabilities, and members states need to ensure accessibility to justice and support services, as well as collecting disaggregated data on violence experiences by women and girls with disabilities, etc. The current strategy was foreseeing the adoption of Recommendation to end harmful practice against women and girls, which could cover forced sterilisation, but at the time this report was submitted it was still not done.

EU Gender Equality Strategy post-2025

Successively, in spring 2025, the Commission launched a consultation for a next Gender Equality Strategy 2026-2030. EDF provided [written input with concrete actions to be included in the Strategy](#). This will be critical to ensure, protect, and promote the rights of women with disabilities in all their diversity.

Women and girls with disabilities cannot be left behind anymore. It is crucial that women and girls with disabilities are meaningfully included in the upcoming Gender Equality Strategy 2026-2030.

EU Anti Trafficking Strategy

The [EU Strategy on Combating Trafficking in Human Beings \(2021-2025\)](#) mentions that the majority of the victims in the EU are women and girls trafficked for sexual exploitation, which is the most prevalent form of exploitation and a form of gender-based violence. The Strategy states that it will “protect, support and empower the victims, with a specific

focus on women and children”, for example through access to appropriate and safe accommodation, that are adapted to their specific needs, circumstances, and that allow them to escape from traffickers. Despite these mentions, the Strategy do not fully focus on the gender and disability perspectives.

See [EDF position on combating trafficking in persons with disabilities](#).

EU Victim’s Rights Strategy

The [EU Strategy on Victim’s Rights \(2020-2025\)](#) is addressed to victims of all crimes and is not explicitly structures around violence against women. However, it includes a dedicated section to “Victims of gender-based violence”, recognising the disproportionate impact of this type of violence, including domestic violence, on women. Some of its actions have included a disability perspective, including the [revision of the Victims’ Rights Directive](#). EDF is a member of the [Victims’ Rights Platform](#) of the European Commission. However, inclusion is not always systematic, in many areas, including in awareness raising activities.

Disaggregated data on women and girls with disabilities

Q: Please specify which EU institutions, bodies and agencies collect data on violence against women and domestic violence, the type of data collected and the respective data categories in use. Please also specify the obligations on data collection and reporting placed on EU member states by EU legislative or other measures, in as far as they pertain to the area of preventing and combating violence against women.

The [European Institute for Gender Equality](#) is an autonomous agency of the EU that works to promote and ensure gender equality across the EU and beyond. They collect data, including through the [Gender Equality Index](#). Data of some categories (work, money, knowledge, time, power, and health) can be disaggregated by disability. However, more data

disaggregation is needed to collect data on different types of disabilities, and on gender-based violence and disability.

[Eurostat](#) also started to collect [data on gender-based violence against women with disabilities](#). This is a step forward, however, there are two factors that can be improved:

- Public communication and awareness raising regarding this data and specific situation of women with disabilities
- Data is not available by different type of disability, and there are no research and data on violence against women with disabilities living in residential institutions and other closed settings (e.g. psychiatry).

Finally, the [European Union Agency for Fundamental Rights](#) (FRA) is working on a report on violence in institutions. This report would provide some initial information. Despite this, we acknowledge that very few research has been done so far in this field.

Involvement of civil society organisations

Questions:

1. How is the work of NGOs and other civil society actors, in particular women's rights organisations, recognised, encouraged and supported by the EU, its institutions, bodies and agencies, as required by Articles 8 and 9?
2. Which measures are taken to ensure that effective co-operation is established with these organisations at the level of the EU and have any legislative or other measures been taken by the EU, its institutions, bodies and agencies to place obligations on EU member states to establish such effective co-operation?

On 29 November 2023, the European Commission established an [EU network on the prevention of gender-based and domestic violence](#).

However, despite our requests we have not been allowed to be member or observer of this network, nor other networks or working groups established by the European Commission in relation to Gender Equality and Women's Rights. As far as we know, no organisation of women with disabilities, or of persons with disabilities, are members of this network

and related expert groups, which means specific expertise and inclusion of women with disabilities is lacking.

Moreover, in light of the transposition process of the Directive on combating violence against women and domestic violence, the European Commission organises “transposition workshops” together with member states. We have offered support to the Commission, including by proposing to participate in these workshops, bringing the disability perspective. So far, we have not received any invitation.

III. Prevention (Chapter III of the convention, Articles 12 to 17)

Q: In light of the overarching general obligations in the area of prevention provided for in Article 12, paragraphs 1 to 6, please provide an account of any preventive action taken, including to promote changes in the social and cultural patterns of behaviour of women and men with a view to eradicating prejudices, customs, traditions and other practices which are based on the idea of the inferiority of women or on stereotyped roles for women and men. Such preventive action must address the specific needs of persons made vulnerable by particular circumstances and place the human rights of all victims at their centre. It must also encourage all members of society, especially men and boys, to contribute actively to preventing all forms of violence, and include the promotion of programmes and activities for the empowerment of women. Please also indicate which measures have been taken to ensure that culture, custom, religion, tradition or so-called honour are not considered as justification for any acts of violence. Please bear in mind that the above principles apply to all preventive measures taken in accordance with the obligations contained in Chapter III.

Women with disabilities are mostly invisible from awareness raising campaigns and preventive actions on violence against women, anti-

trafficking, and victims' rights. As an example, the European Commission Victims' rights campaign "[Keep your eyes open](#)" did not take into account the disability perspective, despite our recommendation to do so.

For more information on stereotypes faced by women with disabilities in the EU, consult our [position paper on gender stereotypes against women and girls with disabilities](#).

IV. Protection and support (Chapter IV of the convention, Articles 18 to 28)

Q: Please provide general information on measures taken to ensure, within the scope of EU competence, appropriate protection and support to women victims and child witnesses of any form of violence covered by the convention as required by Article 18, paragraphs 1 and 2. This includes measures to ensure multi-agency co-operation and effective referrals to general and specialist support services, bearing in mind the general principles set out in Article 18, paragraph 3 that must be applied to all measures taken in implementation of Chapter IV of the convention. These are the need for a gendered understanding of violence against women, a focus on the human rights and safety of victims, and an integrated approach to protection and support services. All protective and supportive measures must also aim at avoiding secondary victimisation, address the specific needs of vulnerable persons, including child victims, and aim at the empowerment and economic independence of women victims. In addition, general and specialist support services must be offered irrespective of the victim's willingness to press charges or testify against the perpetrator.

The Directive on combating violence against women contains measures to prevent violence against women and domestic violence and sets standards for the protection of victims of these crimes.

It creates requirements for better protection and support of women with disabilities by:

- Encouraging EU countries to issue guidelines for law enforcement and prosecutorial authorities, including on how to treat victims in a trauma, gender, disability and child-sensitive manner (article 21).
- Requiring EU countries to ensure the availability and accessibility of helplines for victims, including end-users with disabilities by putting in places measures such as support in a language that is easy to understand (article 29).
- Requiring EU countries to ensure that all support services covered by the law have sufficient capacity to accommodate victims with disabilities, considering their specific needs, including personal assistance (article 33).
- Requiring EU countries to ensure justice professionals receive general and specialist training that is human-rights based, victim centred and gender, disability and child-sensitive (article 36).

Beyond this, the disability perspective was not added to provision of the Directive related to protection and support.

At this stage it is not clear how the EU will ensure that Member States transpose adequately the provisions of the Directive and especially the requirements related to women and girls with disabilities. Without adequate guidance and monitoring, we fear that women and girls with disabilities will not be protected and supported when they are victims of violence, or for girls with disabilities, also when they are witnesses of violence.

Regarding the role of the EU as public institution, we are not aware of any protection and support measure put in place to address violence within

the EU institutions and bodies, and how the rights and needed of women with disabilities are addressed.

V. Substantive law (Chapter V of the convention, Articles 29 to 48)

Q: Please provide information on the EU legal framework pertaining to violence against women, with particular emphasis on the criminalisation of acts of violence against women, unacceptable justifications for such acts (including crimes committed in the name of so-called honour), sanctions and measures, action taken to provide women victims with adequate civil remedies and to ensure their right to claim compensation as well as to prohibit mandatory alternative dispute resolution processes.

The main EU legal framework pertaining to violence against women is the recently adopted Directive on combating violence against women and domestic violence.

The EU Directive on combating violence against women and domestic violence

In May 2024, the EU adopted the first EU law to combat violence against women and domestic violence: the [EU Directive on combating violence against women](#) (the Directive).

One of the Directive's key strengths is its inclusivity, particularly for women and girls with disabilities. Indeed, the law makes specific reference to women with disabilities and to the CRPD. This is critical, as women with disabilities are disproportionately affected by violence, facing higher rates of violence and abuse compared to women without disabilities. They also often encounter additional barriers to reporting

violence, such as inaccessible services or a lack of appropriate support in navigating legal systems².

The Directive pays attention to women and girls with disabilities by requiring member states to:

- Create aggravating circumstances for offences committed against a person with disabilities (article 11 referring to “a person made vulnerable by particular circumstances, such as a situation of dependence or a state of physical, mental, intellectual or sensory disability”). This should apply to all offences that qualify as violence against women and domestic violence at national level and all offences that member states have to criminalise under the Directive - female genital mutilation, forced marriage, cyber violence and cyber harassment (articles 3 to 8).
- Issue guidelines for law enforcement and prosecutorial authorities, including on how to treat victims in a trauma-, gender-, disability and child-sensitive manner (article 21).
- Ensure the availability and accessibility of helplines for victims, including end-users with disabilities by putting in places measures such as support in a language that is easy to understand (article 29).
- Ensure that all support services covered by the law have sufficient capacity to accommodate victims with disabilities, considering their specific needs, including personal assistance (article 33).
- Adopt preventive measures and information presented in a format accessible to persons with disabilities (article 34).
- Ensure justice professionals receive general and specialist training that is human-rights based, victim-centered and gender-, disability-, and child-sensitive (article 36).

² [European Disability Forum, Position paper on violence against women and girls with disabilities in the European Union \(2021\)](#)

Despite these advancements, there are notable gaps in the Directive, particularly regarding issues such as forced sterilisation, rape, sexual harassment. One significant omission is the lack of explicit provisions addressing forced sterilisation of women and girls with disabilities. In practice, the Directive refers to forced sterilisation as form of violence against women but does not require EU countries to ban it. In some EU countries, this practice continues³, particularly among women with intellectual or psychosocial disabilities. This violates their bodily autonomy and constitutes a form of gender-based violence. The Directive does not adequately address this issue, leaving a major gap in the protection of women's rights.

Another important omission is the lack of inclusion of a common definition and criminalisation of rape. Furthermore, while the Directive acknowledges the importance of tackling rape and sexual harassment, it does not fully account for the unique challenges faced by women with disabilities in these contexts. Many women with disabilities may struggle to report sexual violence due to communication barriers, a lack of accessible services, or societal stigma surrounding their experiences⁴. As a result, these women are often left without the support of justice they need after being victimised⁵. The Directive could be more explicit in ensuring that mechanisms for reporting rape and sexual harassment are universally accessible and adapted to the rights and requirements of all women, including those with disabilities.

Another critical issue is the the absence of Organisations of Persons with Disabilities (OPDs) as key stakeholders in the transposition of the Directive, which can hinder the effective implementation and monitoring of measures that could protect women and girls with

³ [EDF webpage on forced sterilisation in the European Union](#)

⁴ [European Disability Forum \(EDF\), Position paper on "Violence against Women and Girls with Disabilities in the European Union" \(2021\)](#)

⁵ [Council of Europe, Commissioner for Human Rights comment on "Addressing the invisibility of women and girls with disabilities" \(2022\)](#)

disabilities. Without the inclusion of OPDs, the experiences, rights and requirements of women and girls with disabilities may not be adequately represented, making the transposition process less comprehensive and potentially leaving gaps in protection and support.

Finally, the Directive omits key aspects related to the collection of disaggregated data: it does not require the collection of disaggregated data based on disability, nor the collection of data related to the place where the offence happened. This creates a gap, as evidence shows that many offenses against women and girls with disabilities take place in institutions⁶.

For more information about EDF positions on the Directive, and on the transposition process, you can consult the [Guidance on transposing the Directive](#).

Forced sterilisation

Forced sterilisation of persons with disabilities is a pervasive abuse and a gross violation of their fundamental rights. Nevertheless, it is ongoing and widespread across Europe and worldwide.

EDF is advocating for the criminalisation of forced sterilisation by all EU Member States with no exception based on disability or legal capacity.

Our report "[Forced sterilisation of persons with disabilities in the European Union](#)" reveals that at least 12 EU countries still authorise forced sterilisation. Due to this unacceptable situation, we are calling for a total ban of forced sterilisation in European countries. The EU has so far taken no action to end forced sterilisation and/or support and remedy victims.

Below are some data and information about forced sterilisation in Europe:

⁶ See for example: [Report of the Special Rapporteur on violence against women, its causes and consequences \(2012\)](#); [Inclusion Europe, "Life after violence: Violence against women with intellectual disabilities in institutions" \(2018\)](#); [European Commission, Guidance on independent living and inclusion in the community of persons with disabilities in the context of EU funding \(2024\)](#).

- [Collection of stories of women with disabilities that faced forced sterilisation](#)
- EDF report on [Forced sterilisation in the European Union](#)
- Article from Euronews about [forced sterilisation of women with disabilities with testimonies](#)
- Article from the New York Times on [forced sterilisation of women with disabilities in Europe](#)
- [Documentary from Arte](#), where Sara Rocha, Vice Chair of EDF Women's Committee, talks about forced sterilisation. It has French and German subtitles.
- Report from "CERMI mujeres", our Spanish member, [on ending forced sterilisation for women and girls with disabilities](#)
- [Media coverage](#)

Document credits

This document was prepared by the European Disability Forum, in consultation with EDF Women's Committee.



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