External Evaluation of the European Disability Forum

Final Report, November 2023

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**Executive Summary**

This evaluation has been commissioned by the European Disability Forum with the aim of measuring the extent to which EDF has reached its objectives as set out in the ‘Citizens, Equality, Rights and Values’ (CERV) work programme, funded by the European Commission and which is used to cover core running costs for EDF. The key purpose of the evaluation is to identify areas where EDF can improve its work, by assessing the strengths and weaknesses of EDF. Results of the evaluation will be used to support the continuous development of EDF’s work.

This evaluation considered **five key parameters of analysis** which are:

* Effectiveness and Impact of EDF’s policy work
* European added value of EDF
* Capacity building of member organisations
* Organisational capacity and efficiency of EDF
* Strategic direction of EDF

The **methodology** for the evaluation consisted of conducting semi-structured interviews and focus group discussion with a range of key stakeholders including the following:

* Members of EDF’s Board and Executive Committee
* Members of EDF Secretariat
* Representatives of European Commission Institutions
* Representatives of European civil society networks

In addition, a members’ survey was conducted which received 12 responses.

**Key findings** from the evaluation included:

* EDF is considered to have exerted strong influence over key pieces of policy and legislation including the European Strategy for the Rights of Persons with Disability 2021-2030, the European Disability Card and the EU Accessibility Act.
* Members are satisfied with the capacity building they have received, although there are also recommendations on how this could be improved.
* Overall EDF is perceived as a very strong organisation with good engagement of and representation by its members.
* EDF is viewed as having a very strong leadership team and highly skilled staff within the Secretariat.

**Key areas of concern** highlighted by internal and external stakeholders included:

* Whilst EDF is seen as having a strong representation of persons with disabilities from across Europe, there was also a desire to see the breadth of the membership represented in the meetings EDF holds with external stakeholders and a request for more testimonies from a wider range of EDF members.
* Whilst recognising that EDF constantly aims to be as inclusive as possible, a number of stakeholders highlighted the need for continued efforts to strengthen the engagement of youth with disabilities and persons with intellectual disabilities and cognitive difficulties.
* Concerns were highlighted regarding the pace of growth of EDF and how this is impacting on the Secretariat’s workload, the clarity and focus of EDF’s work, and internal dynamics within the Secretariat.

In terms of **future strategic direction** of EDF, 5 key issues were identified which are:

1. Continued efforts to diversify funding.
2. Representation of a wider variety of voices in policy influencing.
3. Strengthening engagement with national governments.
4. Executive Committee succession planning.
5. Managing the growth and expansion of the Secretariat.

Key areas of focus for the future strategic direction of EDF highlighted through the member survey were:

* Children and young people with disabilities
* Digital accessibility
* Freedom of movement
* Transport and the built environment
* Social policy

Based on the findings of the external evaluation, key recommendations for action include:

* Continue the strategic diversification of funding for EDF.
* Increase the diversity of voices representing EDF in EU policy influencing activities.
* Strengthen the engagement of youth with disabilities and persons with intellectual/cognitive difficulties in EDF activities.
* Conduct a review of capacity-building needs of member organisations.
* Conduct a review of national level engagement on EU policy influencing.
* Develop a clear strategy for strengthening engagement with the Council of the EU (the Council).
* Invest in specific professional expertise on human resource management.
* Clarify and consolidate inter-team relationships, roles and responsibilities within the Secretariat.
* Invest in time for review, reflection and learning within the Secretariat.

# **1 Introduction**

The European Disability Forum (EDF) is a non-governmental European umbrella organisation set up to represent organisations of persons with disabilities at EU level. EDF promotes the rights of 100 million Europeans with disabilities and is a unique platform bringing together representative organisation of persons with disabilities (OPDs) from across Europe. EDF is run by persons with disabilities and their families. EDF is a front runner for disability rights and a strong, united voice of persons with disabilities in Europe.

In April 2023, EDF commissioned an independent evaluator, Elaine Green, to conduct an external review of the European Commission-funded ‘Citizens, Equality, Rights and Values’ (CERV) work programme, which provides a significant amount of the core funding for EDF’s operations. The review was conducted between May and September 2023 and involved interviews with a range of stakeholders, focus group discussions and a member survey.

## **1.1 Aims and Objectives**

The primary aim of this evaluation is to identify key areas where EDF can improve its work.

The objectives of the evaluation are to:

* Measure the extent to which EDF has met the objectives of the CERV programme.
* Provide an assessment of EDF’s strengths and weaknesses in relation to the implementation of the CERV programme.
* Identify areas of improvement for EDF.

## **1.2 Evaluation Questions:**

This external evaluation reviewed progress of EDF’s work in six key focus areas covering EDF’s organisational capacity as well as its efficiency and effectiveness, capacity building of member organisations, considerations regarding the future strategic direction of EDF, and an assessment of the impact of EDF’s work since the last external evaluation conducted in 2019.

The key questions addressed by the evaluation included:

* **Effectiveness:** Does EDF contribute to the development of EU law and policy and what is the European added value of EDF’s activities?
* **Impact:** How can EDF improve impact and show the results of our work?
* **Capacity-building of members:** Does EDF provide sufficient opportunities for capacity building to its membership and to the relevant stakeholders?
* **Organisational capacity:** does EDF show sufficient operational and professional capacities to implement and coordinate the foreseen activities in its work plan, based on the requirements of the CERV programme?
* **Efficiency:** Does EDF provide efficient methodology for implementing the activities (organization of work, allocation of resources, monitoring strategies, evaluation of risks and identification of ethical issues)?
* **Strategic Direction:** What are the key issues EDF should pay attention to for organisational strengthening and future strategy development?

# **2 Methodology**

The external evaluation of EDF’s CERV programme consisted of three primary components:

* A rapid desk review of available documentation.
* Key informant interviews with 21 internal and external stakeholders.
* An online members’ survey.

**Desk Review:**

The desk review included analysis of key documents providing information and evidence on EDF’s work programme. Documents reviewed included:

* CERV Framework Partnership Agreement
* Previous external evaluation reports produced in 2017 and 2019
* EDF workplans and key performance indicators
* EDF strategic plan
* Key policy briefs and communications materials, including a sample of resources available on the EDF website as well as key policy briefs/reports that have been produced as advocacy tools to advance the aims of the CERV programme.

**Key Informant Interviews:**

Between May and July 2023, key informant interviews were held with a total of 24 external and internal stakeholders (see figure 1). These included:

* Six interviews with European Commission officials, including the Project Manager and Senior Advisor of the EC’s Disability and Inclusion Unit.
* Four interviews with Brussels-based civil society organisations/networks
* Seven interviews with Executive Committee members, including the President and Vice-Presidents of EDF.
* Two interviews with EDF member organisations.
* Five interviews with EDF Secretariat staff.

Interviews were conducted virtually and were guided by a semi-structured interview template covering the six key areas of investigation for the evaluation. Each key informant interview lasted for between 30-60 minutes depending on the availability of the interviewee. A full list of stakeholders interviewed is included in Annex 1.

**Focus Group Discussions:**

To capture input from a wider range of stakeholders than could be reached with the key informant interviews, two focus group discussions were held as part of the evaluation process. The first of these focus group discussions took place in the margins of EDF’s Annual General Assembly and was open to all attendees at this meeting. A total of five participants attended this first focus group discussion. A second, virtual, focus group discussion was held with EDF Secretariat Staff in June 2023. This discussion was attended by seven staff in total.

**Online Survey:**

To capture inputs from EDF member organisations, an online survey was developed and made accessible to all member organisations for a period of 12 weeks from the beginning of May until the end of July 2023. The survey link was shared with members via EDF newsletters and mailing lists. A total of 14 responses to the survey were received, with respondents including member organisations in Italy, Croatia, Hungary as well as pan-European umbrella organisations.

# **3 External Evaluation Findings**

This section of the report presents the evaluation findings, taking into account those captured from the desk review, key informant interviews, focus group discussions and the member survey.

## **3.1 Effectiveness**

The overarching question addressed to assess the effectiveness of EDF in its implementation of the CERV programme considered the extent to whichEDF contributes to the development of EU law and policy and what the European added value of EDF’s activities is. Sub-questions addressed in relation to this included:

* To what extent has EDF and its member organisations successfully contributed to the development of EU law and policy relating to (a) UN Convention on the Rights of Persons with Disabilities, (b) European Strategy on the Rights of Persons with Disabilities?
* What have been the biggest successes in EDF’s contributions to EU law and policy?
* Who are the key stakeholders EDF engages with to contribute to EU law and policy? What is the quality of EDF’s relationship with each of these key stakeholders?
* To what extent does EDF impact the disability movement at European level?
* What difference does EDF make to the EU? What would be the impact on persons with disabilities in the EU if EDF did not, or ceased to, exist?
* How European is EDF? To what extent does it represent OPDs from across Europe? How strong is the European identity of EDF?
* Is EDF a place where OPDs in Europe come together, campaign together etc.?

### **3.1.1 Key Successes and Achievements**

Overall, EDF is considered to be a highly impactful organisation that has contributed to very significant and important policy developments within the EU that have directly impacted on the lives of persons with disabilities across Europe. The key successes achieved in the last three years, as highlighted by both internal and external stakeholders include:

* The **European Disability Card**, which will have a significant impact on freedom of movement within the EU for persons with disabilities.
* **EU Accessibility Act** – whilst there were some concerns expressed that this wasn’t as strong as some members would have liked there is a clear recognition that without EDF the Act would not have been passed.
* **European Strategy for the Rights of Persons with Disability, 2021-2030.** This was a critical achievement as in 2022 when the legislative term began it was not clear that the previous strategy would be renewed. EDF advocated hard to push the strategy through, as well as pushing for an EC Commissioner on equality who is mandated to implement this strategy.
* The **fifth European Parliament of Persons with Disabilities** was considered by many stakeholders as a particularly important achievement for the way in which it brought so many key stakeholders together.
* EDF has also had important policy successes at the EU level in relation to both the **COVID-19 pandemic** and the **war in Ukraine**, ensuring the rights of persons with disabilities were upheld in both crises.
* Additional areas where EDF has had good impact on EU policy and legislation include influencing policy change on **deinstitutionalisation**, on the EU’s **CRPD negotiations**, highlighting the risks and benefits of **artificial intelligence**, and on ensuring greater inclusion of women with disabilities on proposals and policies relating to **women’s rights**. EDF is also increasingly being seen as a ‘go to’ organisation on disability rights for **private sector** organisations.

Amongst member organisations, EDF is considered to have had high impact on influencing policy with 8 out of 11 respondents (or 73%) sharing that they felt that within the last three years EDF has had high impact on the development of EU policy and law relating to the UN Convention on the Rights of Persons with Disabilities (CRPD). The remaining 3 of these respondents (27%) felt that EDF had achieved some impact but this had been limited. However, when questioned about the impact EDF has had on influencing policy and law relating to the EU strategy for persons with disabilities and in relation to equality and human rights mainstreaming, members responding to the survey felt that EDF has not been able to have the level of impact that its members would like to have seen (see figure 4). Where members considered EDF to have had more limited impact, this was largely a result of member organisations feeling that not all the recommendations made by the disability movement were included in EU policy and law, that EDF could be more proactive than reactive and could demonstrate its impact more, and that there were concerns that the impact of policies influenced at the EU level “rarely trickles down to improve disabled people’s lives individually”. Specifically in relation to influencing EU policy and law on equality and human rights one survey respondent shared that whilst they believed EDF had made an impact on laws and policies in this area, “it is a big area to work and we [EDF] are not the only players in this context, so I would say our impact has been more limited.”

EDF staff and members are clearly seen by external stakeholders as experts in their field and EDF is recognised and well regarded by the EC and other EU institutions. A small number of external stakeholders commented that as EDF works collaboratively with other organisations to influence EU policy it is difficult to attribute all progress on EU disability policy to EDF. However, as many stakeholders highlighted, EDF has had a clear impact in giving more visibility to disability, with some policies, such as the European Disability Card, which was initiated by the Belgian National Council, clearly originating from EDF and its membership.

### **Gender and Inclusion**

EDF is considered to be very strong on gender and inclusion as well as inclusion of persons with different disabilities. External stakeholders considered EDF to be leading the way in terms of both gender and disability inclusion, with many viewing EDF as a model to aspire to in relation to inclusion of their membership. As one external stakeholder remarked, EDF is a “benchmark to look up to” and another shared that “my impression is that EDF is at the forefront of dealing with intersectionality”. Most internal and external stakeholders felt that EDF was very strong on addressing issues of gender equity, both in terms of the make-up of the Executive Committee and the work that EDF and its members have conducted on gender and disability. Outcomes of the member survey also support this, with more than 80% of respondents agreeing or strongly agreeing with the statement that EDF adequately addresses issues of gender and non-discrimination through its organisational systems and structures (see Figure 2).

Internal stakeholders highlighted that gender equity is high on the agenda of all meetings, that EDF also aims to ensure a gender balance on EDF delegations, and that efforts are underway to update the gender mainstreaming toolkit as well preparing different guidelines to help provide and promote gender equity. The Women’s Committee, in particular, is considered to be very strong and impactful. It was also highlighted that an important area of work that EDF is beginning to look at is in relation persons with disabilities who are non-binary, although it was also shared that there is a need for more awareness and visibility of this within policy papers and in governance structures.

Whilst EDF is overall considered to be very strong on addressing gender and other insectionalities of persons with disabilities, there were also a number of areas where it was considered that EDF could do more to represent the diversity of the disability movement, with one key area being in relation to the representation of youth with disabilities. Although EDF has established a Youth Committee it was felt that this youth committee did not have the same level of support as the women’s committee and, currently, there are no youth with disabilities represented on the Executive Committee. The youth committee has been established and there is a desire to see more youth representation on the Board. Diversity on the Board and Executive Committee, however, is determined by which members are put forward for selection and so greater diversity is dependent on the political will of member organisations to put forward other, more diverse, representation. This presents a challenge for youth with disabilities as some of the member organisations do not put forward youth with disabilities to be representatives of their organisations, while there are very few organisations focused on youth with disabilities within the membership of EDF. It was also considered that the women’s committee is strong and impactful because it has strong leadership, a clear vision of what the Committee wants to achieve, very clear policy positions and policy calls/asks (e.g. on enforced sterilisation, violence against women, and employment for women with disabilities. The youth committee however does not have this same level of clarity. It would be important therefore to work with the youth committee to support them to develop a clear vision of what they are trying to achieve and to develop clear policy positions and asks to support their work. It would also be important to develop a strategic vision on youth with disabilities, which should be developed in collaboration with the youth committee but owned and supported across EDF structures. One key informant highlighted that the youth committee felt like an ‘add-on’ and didn’t feel like it was fully integrated into EDF systems and structures yet.

A critical issue that was raised in relation to youth with disabilities was the need to build the next generation of advocates and that, whilst EDF is very strong there is an increasingly urgent need to consider succession planning and to invest in bringing on board a younger generation of disabled activists into the membership, the Executive Committee, and into policy activities and events at the EU level. One external stakeholder, for example, highlighted that the majority of people they see engaging with EDF activities are older persons with disabilities who may not be fully representative of all persons with disabilities across Europe. Suggestions on how to strengthen the voice of youth with disabilities included establishing a mentoring scheme whereby the more established/older leaders within EDF mentor some of the younger members to be able to have the same level of impact; bringing youth with disabilities to shadow meetings with senior EU officials; or through more established members of the Executive Committee supporting younger members of EDF to build their policy positions/speaking points and providing them with more direct opportunities to engage with key EU stakeholders.

A second key area of weakness that was highlighted, particularly by internal stakeholders and EDF member organisations was in relation to the full inclusion of persons with intellectual disabilities. Several stakeholders highlighted the need to find ways to strengthen the inclusion of persons with disabilities requiring more intensive support or with cognitive difficulties, including within key governance meetings and structures, and in the production of policy materials. Interviewees highlighted, for example, that the materials produced by EDF, as well as discussions during key meetings such as the Annual General Assembly can sometimes be difficult for non-English speakers, or those with cognitive impairments to understand and engage with. Given this, it will be important for EDF to consider how to bridge the gap between how it communicates to policy makers and how it communicates to persons with and without disabilities. It was, however, also recognised by many internal stakeholders that EDF has identified this as an area of weakness and is working to address this. One specific recommendation to help address this was for the EDF Secretariat to find ways to translate complicated policy materials into easier to understand documents/tools so that members can more easily understand the issues and what they can do about them.

Other gaps that were identified were in relation to ethnic minorities, persons with disabilities in migrant/displaced communities, and in relation to LGBTQI persons with disabilities. As one stakeholder noted, whilst EDF has good representation of persons with disabilities, there are currently 100 million PWDs across Europe and it is not always clear how many of these 100 million PWDs are involved with EDF member organisations. It was, however recognised that EDF is ‘only as strong as its members’ and if these communities are not present within the member organisations, it is difficult for EDF to bring these issues forward.

### **3.1.3 European Added Value of EDF**

All stakeholders participating in this external evaluation considered EDF to be a critical voice amongst the EU institutions in relation to protecting and advancing the rights of persons with disabilities. Multiple external stakeholders highlighted that EDF has had a clear impact on giving more attention to disability and that, without EDF, many initiatives would not have progressed in the way they have. A quote from one internal stakeholder sums this up well: “Without EDF we would not be where we are with disability and human rights. I think the EU is lucky to have us.” External stakeholders also clearly recognised the important role EDF plays in shaping EU policy and legislation on disability rights with one European Commission representative highlighting, for example, that EDF has had a clear impact in giving more visibility to disability, evidence of which can be seen in the agreement of policies such as the European Disability Card which originated from the EDF membership. Other comments from external stakeholders highlighting the value added of EDF included:

* “EDF plays an important role in raising awareness [of disability rights] and pushing the necessary decisions as well as for fine-tuning issues and sharing perspectives of persons with disabilities.”
* “EDF brings in a very valuable CRPD perspective and are always there to remind that the EU has ratified the CRPD.”
* “All EU institutions learn how to engage with EDF as a very important stakeholder.”
* “I have a difficulty imagining an EU without a strong representation of the voice of persons with disabilities at the EU level. EDF has built itself up as THE representative organisation and it does a good job and it’s natural for them to continue. If they were to disappear very quickly, there would be a need to build something up very quickly. EU institutions need this movement and needs the voice of PWD to be heard.”

The value added of EDF is also clearly recognised by its member organisations. In the member survey conducted, respondents were asked to select a range of statements on the impact and added value they considered EDF to have (see figure 5). The top three statements selected by survey respondents were:

* EDF is made up of a wide cross-section of organisations and persons with disabilities from across Europe. (100% of respondents).
* EDF adds clear value, at a European level, to the activities of individual member organisations (82% of respondents).
* EDF has successfully influenced EU policies and laws that have contributed to fulfilling the rights of person with disabilities across Europe (73% of respondents).

Of other statements available in the survey, just 1 respondent selected the statement that EDF does not sufficiently reflect the views, needs and rights of persons with disabilities from across Europe. The concern raised here highlighted that, recognising the Secretariat is frequently working to tight timelines, some member organisations would like to be more systematically consulted when new positions are developed by EDF on key issues affecting persons with disabilities.

### **3.1.4 Quality of stakeholder engagement**

EDF has wide ranging engagement with diverse stakeholders across the EU policy landscape, with a particular strength in engaging with and influencing the European Commission. One interviewee, for example, commented that EDF is perceived by external stakeholders to be “really working hard behind every proposal of the EU and very often the proposals originate from EDF.” Another interviewee commented that “every step the [European] Commission has taken on disability has originated from EDF.”

Key levers of influence that EDF uses successfully are its relationships with members of relevant DGs of the EC as well as the Disability Intergroup of the European Parliament to protect the rights of persons with disabilities. EDF was considered to engage well with representatives from a range of EC Directorates, including DG Employment, DG Connect, DG MOVE, DG ECHO, DG NEAR, as well as the External Action Service. EDF also has strong engagement with senior representatives within the European Commission, including good relationships with key Commissioners such as Commissioner Dalli (the European Commissioner for Equality).

EDF is also considered by both internal and external stakeholders to engage well with the European Parliament, with other civil society organisations and networks, and are starting to engage more with bigger companies such as Microsoft. As one interviewee commented their presence is felt ‘a little bit all over’ the EU institutions and stakeholders in Brussels.

Some stakeholders, however, made the observation that while EDF is impactful in many areas and is very active in submitting recommendations, producing submissions, and responding to consultations there is also a concern that if EDF does not engage with these activities then disability is not mentioned. As one internal stakeholder commented, “when we do it, we see the results, but when we don’t do it there is no mention of disability.” This suggests that while EDF is very well recognised for its work, there is potentially an over-reliance on EDF to ensure disability is included in EU policy and legislation. To have even greater impact, it would be good for a wider range of EU civil society organisations and networks to also be advocating for the rights of persons with disabilities.

Some concerns were raised that EDF does not have sufficient influence in areas that are not specifically related to disability or equality. Several stakeholders shared that whilst EDF is always the ‘first port of call’ on issues relating to the inclusion of persons with disabilities or on disability rights, EDF is unable to exert the same level of influence on wider, non-disability specific areas of policy engagement, such as health or climate change. A specific example given was that for a recent conference on shaping the future of the EU, EDF was not given the opportunity to actively engage and contribute to the discussions. As one interviewee observed, “within the DGs dealing with disability or equality, EDF is there, but for other DGs, EDF is listened to with respect but doesn’t have a seat at the table.”

A critical area of challenge for EDF, however, appears to be in relation to its engagement with the **Council of the EU (the Council)**. As a membership body, it is difficult for EDF to gain official recognition with the Council. However, this is where many critical decisions on legislation are made and it is important to have influence here. Strengthening engagement with the Council requires supporting national members to conduct advocacy activities with their national governments, as well as engaging more with their MEPs, to ensure that changes to policy and legislation passing through the Council can be secured. Influencing the Council in this way cannot be achieved by the Brussels based EDF Secretariat staff and needs engagement from national members. This appears to be an important challenge for EDF to consider how to address in the coming years.

### **3.1.5 The European Voice and Identity of EDF**

EDF is viewed as being fully representative of the disability movement across Europe and it was also noted that more recently EDF has been recognised as an important voice for persons with disabilities at the international level through, for example, its recent involvement with the annual Conference of State Parties on the CRPD. The value added of EDF to the development and implementation of EU policy is very well recognised and it is clear that without EDF there would have been very little progress on the issues faced by persons with disabilities. As one stakeholder shared, “EDF plays an essential role as the mentality and awareness about disability in the wider population and among decision-makers is very low.”

The external evaluation also highlighted that EDF has a very strong European identity and one of the key aspects of EDF’s added value is the way in which EDF is able to gather concrete experiences from its member organisations and present these to EU policy-makers in a range of formats such as in consultation responses, events organised by EDF, and sharing the results of public surveys conducted by EDF. EDF is also considered to be particularly strong in mobilising its membership to respond to public consultations on EU policy and legislation.

## **3.2 Impact**

The second area of review for this evaluation looked at how EDF can improve its impact and show the results of its work. Sub-questions considered included:

* What level of impact do you consider (a) the EDF Secretariat and (b) EDF member organisations to have had in influencing EU policy and legislation towards persons with disabilities?
* To what extent have EDF member organisations directly contributed to activities aimed at influencing EU law and policy as it relates to persons with disabilities?
* What areas of improvement, if any, are needed to ensure EDF activities have direct, positive, impacts on laws and policies relating to persons with disabilities?
* Do you consider the voice of persons with disabilities to be adequately representative and influential at the EU level? How has EDF contributed to this? What more can/should EDF be doing to further the representativeness and influence of persons with disabilities?
* Does EDF have clear systems in place to enable it to effectively demonstrate the outcomes and impact of its work?
* Do you think the work of EDF is adequately recognised by key stakeholders, including those in EU institutions and Member States?
* What could be done to further improve the visibility and impact of EDF’s work at the EU level?

Overall, it was considered that EDF has had significant and measurable impact on influencing EU policy and legislation at the Brussels level, as has been evidenced in previous sections of this report, and it is clear that EDF is highly regarded and well recognised by internal and external stakeholders as an essential influencer of EU policy and legislation. EDF works closely with key stakeholders across the EU policy environment and is highly visible as an expert and key partner to work with on disability issues. The fifth European Parliament was considered a particularly important event for raising the visibility of EDF and its member organisations as well as for highlighting current challenges and issues to be addressed to secure the rights of persons with disabilities. Several external stakeholders also highlighted EDF’s annual event on 3rd December to celebrate the International Day of Persons with Disabilities as an important occasion to increase awareness of disability rights amongst key European policy and decision-makers.

At a national level, however, there is a sense that EDF members are not as strong as they have been in the past and that EDF is not as visible as it could be at this level. Whilst it is not the role of the EDF Secretariat to strengthen its presence at national level, there is perhaps more that the Secretariat could do to support member organisations to build their visibility and influence at the national level.

One other area of improvement that was highlighted by some interviewees is in the range of voices of persons with disabilities that are able to participate in EDF events and activities. Whilst it was recognised that some individuals and organisations are more actively involved with EDF and so are more present and visible in EDF events and policy activities, it was felt that there is a need to “find different players and different faces” to demonstrate the way that EDF evolves to respond effectively to the different issues and challenges that persons with disabilities from across Europe experience. This includes finding ways to improve the representation of persons with intellectual and psycho-social disabilities. It was however, welcomed that EDF recognises this and has a constant ambition of becoming more representative of the diversity of persons with disabilities from across Europe.

## **3.3 Capacity-building of members**

The overarching question for this section of the evaluation looked at whether EDF provides sufficient opportunities of capacity building activities to its membership and to the relevant stakeholders. Sub-questions that were considered include:

* What have been the key areas of capacity building of members that have been conducted since 2019?
* To what extent do EDF member organisations consider the capacity building provided meets their specific needs?
* Are there any key areas of improvement in relation to the provision of capacity building to member organisations that EDF needs to address?

Most stakeholders who responded to the questions about capacity building considered EDF to be responding well to the needs and activities of the membership. Mechanisms used for capacity building that were mentioned by interviewees included training workshops, online events and webinars, and sessions at Board meetings and the Annual General Assembly. Particular areas and types of capacity building that were welcomed include:

* + Building capacity for influencing the EU process, as this is critical to support national members in understanding the EU influencing process and the role national members play in supporting the EU level influencing.
	+ Capacity building on fundraising was also welcomed, given the financially vulnerable situation that some member organisations find themselves in. This includes capacity building on risk management, financial management and organisational capacity strengthening.
	+ Toolkits, policy briefings and newsletters were all highlighted as important areas of support for improving awareness and understanding of EU level activities and policies.

Whilst member organisations were appreciative of the capacity building support provided by the Secretariat, several staff and member organisations suggested that it would be helpful to conduct a review of the capacity building needs of member organisations to ensure that the support provided is meeting the specific needs of member organisations.

Two areas in particular were highlighted where additional capacity building may be required. These are, firstly, in strengthening the capacity and skills of member organisations to engage with those outside the disability movement, so that the voices of persons with disabilities are heard beyond the disability-specific issues they face. A second critical area of capacity building need highlighted was in relation to influencing the Council of the EU. Several member organisations and internal stakeholders shared that they were unclear on the mechanisms for influencing the Council, although were conscious that action was required at a national level as well as in Brussels. This appears to be a highly important area of capacity building to enable EDF to have even greater impact at the Brussels level and to ensure that key legislation, such as the Accessibility Act, is not ‘watered down’.

## **3.4 Efficiency**

The overarching question considered in relation to the efficiency of EDF’s work was: does EDF provide efficient methodology for implementing the activities (organization of work, allocation of resources, monitoring strategies, evaluation of risks and identification of ethical issues)? Sub-questions considered to help refine the response included:

* Is there a clear delegation of responsibility for delivering on the CERV programme?
* Are there sufficient systems in place to enable EDF to respond to a changing and evolving context for persons with disabilities?
* Are there any specific barriers that need to be overcome to enable EDF to manage and deploy resources efficiently?
* Does EDF have clear systems in place to ensure efficient monitoring, evaluation and learning from the CERV programme?
* What systems are in place to ensure the evaluation of risk and identification of ethical issues?
* Are there any improvements that need to be made to EDF’s systems for monitoring, evaluation and learning (MEAL), risk assessments, or ethics assessments?

Overall, it was felt that EDF has the right expertise, skills and resources, as well as good organisational systems in place to deliver on the CERV programme. External stakeholders recognise and welcome the way the work programme has developed over recent years and Secretariat staff are very highly regarded for their expertise across the EU policy environment. As one stakeholder said, “they do great work and are very valuable in what they bring to the policy area.” All external stakeholders, as well as members of the Executive Committee and EDF members, were overall very impressed with the quality of expertise and engagement from EDF Secretariat staff.

### **3.4.1 Sufficient Systems**

Some of the systems considered to be functioning well and enabling EDF to deliver the CERV programme efficiently included:

**Email groups:** the email groups established on different aspects of EDF’s work (e.g. transport, accessibility) were identified as an important tool for enabling everyone who is interested to take an active part and be active in EDF. These groups also enable EDF to gain an understanding from the grassroots on what changes are happening and what activities are needed to respond to those issues.

**Involvement of Members:** Several internal stakeholders and member organisations highlighted that the Secretariat team is very strong at mobilising member engagement with the development of policy positions, that there is a strong sense of cohesion across both the Secretariat and the member organisations, and that the Secretariat uses the expertise of its members well.

**Clear systems and processes:** Several stakeholders highlighted the clear systems and processes that EDF has in place which strengthens the efficiency of the organisation. This includes, for example, having a clear workplan with clear deadlines; strong processes for keeping the membership up to date with activities including through newsletters, and the regular Board, Executive Committee, and Annual General Assembly meetings; and ongoing communication between the Secretariat and member organisations. It was also highlighted that EDF has established ways of working that can be expanded or contracted to manage work, enabling people to have clarity of deadlines and expectations, whilst also allowing for flexibility to respond to opportunities.

Whilst it was felt that EDF has strong systems in place to manage and deliver on the CERV workplan, several concerns were also highlighted. These included a lack of flexibility within the EC grant; concerns regarding high workloads for Secretariat staff members; concerns regarding the balance between different work programmes (e.g. EU policy work, international cooperation, programme activities) and the coherence and collaboration across teams within the Secretariat; concerns regarding the ongoing sustainability of programmes once grant funding ends; and concerns regarding the lack of clarity of responsibility for communications activities. It is important to note here, that the Secretariat is aware of many of these challenges and is in the process of addressing them. This includes through bringing in a HR consultant to provide support on human resource related issues and reviewing the structure of the Secretariat to clarify roles and responsibilities of different teams. Efforts are consistently taken to ensure the EDF Secretariat is a positive environment to work through, for example, respecting non-working hours and all forms of leave (annual leave, maternity leave etc.), providing ongoing training to all staff, and providing good flexibility and freedom to work in ways that respect individual needs.

### **3.4.2 Monitoring, Evaluation and Learning**

Internal stakeholders shared that EDF has been investing in strengthening its **monitoring, evaluation and learning systems** in recent years, which has been warmly welcomed. Both EDF member organisations and Secretariat staff shared that some of the benefits of this investment include that EDF now has a system in place that monitors activities throughout the year which enables staff members to manage programmes and activities more effectively. Some internal stakeholders, however, did share that whilst the reporting mechanism for the CERV programme is very comprehensive, it is also quite burdensome. Despite this, member organisations and Secretariat staff considered it an important tool for keeping track of what has been achieved and accomplished. A key area for improvement, however, is in relation to conducting more analysis of the information shared through the monitoring process and creating more opportunities and space for reflection on what can be learnt from this information.

In relation to **learning** more specifically, whilst recognising there is always room for improvement, it was felt that overall EDF is very good at sharing learnings from its work with members and external stakeholders. These learnings are shared through a range of mechanisms including events, newsletters, social media as well as through regular updates and discussions at Board and Executive Committee meetings. The Annual General Assembly and the fifth European Parliament of Persons with Disabilities were both highlighted as being good opportunities for sharing learning among members and wider audiences. Within the Secretariat, however, it was felt that busy workloads resulted in a lack of time for reflection and learning from policy influencing and programming activities and some staff members shared that they would like to see more space for discussion of learnings within the Secretariat. There was a feeling that when space is allocated for learning, it is very short (e.g. one hour) and people often have not had time to prepare sufficiently to be able to have meaningful discussions. One specific recommendation was to have a one-day retreat with Secretariat staff to review achievements, consider lessons learned, identify where improvements can be made, share reflections on the past year, and look at planning for the coming year and that regular sessions such as this should be built into the Secretariat’s workplan throughout the year. In addition to this, it was suggested that the Secretariat would benefit from having a monitoring, evaluation and learning officer to help further strengthen monitoring, evaluation and learning systems, to support projects with their MEAL activities and to help share learning from work conducted. As one stakeholder shared, “the EDF secretariat tends to produce reports and move onto something else, but without conducting analysis of the impact of what has been done. Having someone who can help the organisation to do this would be great.” However, it was also recognised that this would not be possible without funding.

In relation to **risk assessment**, internal stakeholders shared that there has been a lot of work conducted in recent years to put in place a risk assessment system and to ensure staff understand how to use it. As a result, EDF now conducts risk assessments twice a year as well as conducting ad-hoc risk assessment exercises when significant new risks, such as staff members travelling to Ukraine, arise. Overall, it was felt that the systems in place are sufficient for EDF’s requirements and that policies are in place and staff have had training on relevant policies.

## **3.5 Organisational capacity**

The overarching question for this aspect of the external evaluation was: does EDF show sufficient operational and professional capacities to implement and coordinate the foreseen activities in its workplan based on the requirements of the CERV programme?

Sub-questions that were asked to gather more detailed responses included:

* Does EDF have clear organisational structures that members are aware of?
* What are the strengths of the EDF model that enable it to deliver on the CERV programme?
* Are there any improvements that could be made to the organisational systems/structures to enable the full implementation and coordination of the CERV programme?

Responses from key informants, focus group discussions and the member survey all found that EDF has very strong operational and professional capacities to implement and coordinate the activities in its workplan based on the requirements of the CERV programme.

The current structure of EDF, with clear roles and responsibilities for the Board of Directors, the Executive Committee, four thematic committees[[1]](#footnote-1), and the EDF Secretariat is considered by all stakeholders to deliver a strong organisation that represents persons with disabilities from across Europe and has a critical impact on influencing policy and legislation of the European Union.

The evaluation found that this clear organisational structure facilitates engagement in activities in line with the workplan (and beyond) and that with each evolution of EDF, the organisation has grown stronger. As a result, EDF is seen by both internal and external stakeholders as having very good resources, systems and structures, as well as strong leadership that enables EDF to implement and coordinate the foreseen activities very well, and in many cases, to go beyond that which is foreseen by the CERV programme.

The member survey conducted found that, of the 14 responses received, 91% of respondents either agreed, or strongly agreed with the statement that EDF has clear systems and structures that are easy to understand and navigate (see figure 2).

EDF has a very strong, and clear model that enables it to deliver on the requirements of the CERV programme very effectively. Key strengths of this model include:

* + A strong Executive Committee that meets on a regular basis, both in person and virtually.
	+ It is a model that encourages engagement at all levels.
	+ EDF takes a cross-disability approach, bringing all disability perspectives/representatives together.
	+ EDF is very good at consulting with its members on all the work they do. This commitment to consultation is considered ‘their greatest strength’.
	+ EDF has strong contacts at the EU level and good access to many bodies within the European Commission and European Parliament.
	+ EDF staff do good analytical work and can cover many topics at one time.
	+ Having an operational grant enables EDF to build knowledge and expertise of the Policy Team.

The strength of the EDF model can be seen in the range of quotes received from external stakeholders during the evaluation process which include:

“EDF is a powerful interlocutor in the policy environment in Brussels.”

“EDF are very powerful” and “they are the most important disability organisation [in Brussels].”

### **3.5.1 Voice and Representation of Persons with Disabilities in Brussels**

EDF is seen as a very strong advocate for persons with disabilities in Brussels, is highly regarded for its level of representation of persons with disabilities and is recognised as representing persons with disabilities from all EU member states. However, several external stakeholders also reflected that EDF could have even greater impact if the wide diversity of persons with disabilities from across Europe and from the European disability movement were reflected in the activities conducted by EDF in Brussels. Specific recommendations made in relation to this included:

* Ensuring a wider range of representatives from across the EDF membership are offered the opportunity to participate in high-level meetings with European Commission officials, as well as EDF events and other key meetings with EC officials.
* Producing more testimonies and case studies from across the European disability movement that can demonstrate more clearly the challenges and types of discrimination that persons with disabilities experience in different parts of Europe.

In addition to these recommendations, it was noted that often EDF engagement on EU policy influencing is focused on senior level representatives from EDF meeting with senior officials of EU institutions. While this is welcomed, it was also recommended by some external stakeholders, that EDF should ensure it also engages with EU representatives at less senior levels to build stronger and more sustainable relationships with the EU institutions.

One specific issue highlighted was that there is sometimes less focus than some member organisations would like on people with very high support needs and a recognition that, while this can be a complicated area, EDF is exploring how it can better involve and engage this group of persons with disabilities. It was also noted that, for this group of persons with disabilities, it is important to explore the role of parents as advocates, whilst also recognising that the autism spectrum is diverse and evolving with a growing number of self-advocates.

Building on these challenges, it was considered that the following areas could be further strengthened to enable EDF to better implement and coordinate the foreseen activities in its workplan:

* + Sustaining their presence more. Whilst EDF is recognised and valued for producing good quality policy papers, some external stakeholders highlighted that there is also a need for EDF to build relationships and hold meetings with representatives of EU institutions at all levels, not only at the senior level. This means that it should not just be the Chair of the Board/Executive Director that represents EDF at key meetings but that a wider range of the EDF Secretariat staff and membership should also be engaging with EU institutions at all levels. Some EC stakeholders, for example, highlighted that it would be beneficial for EDF to build stronger relationships with EC staff and officials who support the day-to-day work of the different Directorates, as well as strengthening relationships with the Commissioners.
	+ Collecting more testimonies from people with disabilities on the different issues and types of discrimination that they face and bringing these to help influence EU policy. Several external stakeholders highlighted that while they believed EDF is representative of disability organisations from across Europe, this breadth of representation is not always seen at the EU level. One stakeholder, for example, shared that in the past EDF was very strong on sharing testimonies from its members which really helped to highlight the issues and types of discrimination that they were facing, but that this does not seem to happen so often now. Another external stakeholder highlighted that there are 100-million persons with disabilities in the EU but questioned how many of these people are in the organisations of persons with disabilities that are in EDF’s membership. This same stakeholder highlighted that the majority of people they see engaging with EDF activities are older persons with disabilities who may not be fully representative of all persons with disabilities across Europe. A specific point raised was that there are many persons with disabilities across Europe who are not in OPDs, so to what extent are these people represented by EDF and how many of the 100 million persons with disabilities across Europe does EDF represent.
	+ Engaging more with different types of stakeholders and experts (e.g. academics, technology companies, private sector/professional allies) and building strategic alliances with organisations working on issues such as environmental policies, health rights etc. that are not specifically targeting persons with disabilities. Several interviewees, both internal and external, highlighted that EDF could potentially have more impact if it engaged more strategically with a wider range of stakeholders in the private sector. This was seen to be particularly important in the areas of accessibility where the implementation of legislation such as the Accessibility Act will require support from large tech companies such as Microsoft but could equally be important in relation to passenger rights and freedom of movement. There also appeared to be support for EDF to engage more with actors outside of the disability movement, such as in the areas of climate and, to a lesser degree, health recognising that EDF’s expertise on disability inclusion could have important impacts in these areas.

### **3.5.2 Communication**

One of the areas in which EDF is considered to have a considerable strength, by both its membership and external stakeholders is in relation to communication. Member organisations welcomed the range of communications tools produced, such as regular newsletters and clear recommendations on actions to take with politicians. Several member organisations highlighted that these tools helped them to become more efficient in improving the situation for persons with disabilities.

However, it was also highlighted that there are some improvements that can be made to way EDF communicates its policy work. Some stakeholders appreciated the level of communication but often found it to be very policy heavy and difficult for people to really understand what policy influencing has been achieved and what it means for individual persons with disabilities. One stakeholder commented that “communications are all about heavy policy stuff that even most people with disabilities are baffled by, even though it affects them.” Some stakeholders also highlighted that the materials produced by EDF, as well as discussions during key meetings such as the Annual General Assembly can sometimes be difficult for non-English speakers, or those with cognitive impairments to understand and engage with. It will be important therefore for EDF to consider how to bridge the gap between how it communicates to policy makers and how it communicates to persons with and without disabilities.

One specific recommendation that was made was that to improve communication it would be helpful for the EDF Secretariat to find ways to translate complicated policy materials into easier to understand documents/tools so that members can more easily understand the issues and what they can do about it.

### **3.5.3 Human and financial resources**

Overall, it was felt that EDF has sufficient staff and financial resources, operating at a high level of quality and expertise, to deliver on the workplan of the CERV programme. External stakeholders noted that the workplan has developed a lot in recent years and is now “much better, more user-friendly and easier to follow”. Secretariat staff also felt that EDF was sufficiently resourced to deliver on the CERV programme, noting that EDF is quite well resourced and has very qualified staff which is what distinguishes it from other organisations. As one stakeholder shared, “there are many people with many years’ experience, as well as a good balance of senior and junior staff.”

Comments received from stakeholders interviewed included:

“They [EDF] do great work and are very valuable in what they bring into this policy area.”

“I have the impression they do everything they can to do the best work. With what they have they are doing a lot and deliver high quality.”

“They are getting better and better and use their capacity to the maximum to promote and protect the rights of persons with disabilities in all fields.”

Whilst recognising that EDF currently has the required resources to deliver the CERV programme’s workplan, several challenges were also highlighted. One of the most significant of these was a concern about the **lack of flexibility of the EC grant** which was considered a constraint to working on issues affecting persons with disabilities that are not specifically included in the CERV workplan. However, it was also recognised that within these constraints, EDF uses the EC grant as flexibly as it can.

A second critical challenge highlighted was in relation to EDF’s ability to engage with the **Council of the EU (the Council)**. This was highlighted as a critical gap in EDF’s ability to influence policy change, given the reliance on national Ministers of State being representatives at this level. Several stakeholders highlighted this as a significant challenge for achieving greater impact with EDF’s work. However, it was also recognised that there is a limit to the Secretariat’s ability to influence the Council and that real influence over the Council needs to come from the national level. A critical gap identified therefore was the need to strengthen capacity to engage with Council members and to engage more with national MEPs. It was recognised that as the Council is made up of national governments, it is only through having strong national members engaging and influencing their national members that EDF can have the required impact at national level and, subsequently, with the Council.

A small number of stakeholders also expressed a concern that while EDF appears to be very good at doing what the EC and EU institutions want EDF to do, this means that there is less space to **fully engage with members** on what is important to them and, therefore, what EDF should be focusing on in terms of policy change. As a possible solution to this challenge, one interviewee highlighted that there is a EDF staff member who has direct contact with the National Councils in the membership and this has been a really important tool to bring in the voice of national members. It was suggested that it would be good to expand this type of contact and to have more secretariat staff having more direct contact with National Councils and national members.

Whilst both external and internal stakeholders considered there to be sufficient human and financial resources to deliver on the CERV workplan, significant concerns were raised by EDF Secretariat staff regarding **the recent growth and expansion of the Secretariat** and how this is impacting on staff across the Secretariat, including those not specifically working on the CERV programme. Specific gaps and challenges highlighted by members of the Executive Committee and by Secretariat staff included:

* **Human resources:** there was particular concern that the team responsible for human resources are under-resourced, especially given the expansion in the size of the Secretariat. A strong recommendation was made that additional, professional, resource should be brought in to support human resource needs, and that this should be brought in on a permanent basis. Recognising this challenge, the EDF Secretariat has recruited an executive secretary who will join the organisation in January 2024.
* **Communications:** significant concerns were expressed regarding the capacity of the communications team to manage all the requests it receives, the lack of clarity regarding when individual teams should take responsibility for producing communications materials, and the lack of support available to enable teams producing their own communications materials to produce high quality products. In addition to this, some member organisations highlighted the need for clearer communication on policy messaging, actions that member organisations can take at the national level to increase the impact of Brussels-level activities, and in translating complex and ‘heavy’ policy content into language/formats that are easier to understand and use beyond Brussels.
* **Competing priorities and siloed working:** In interviews and focus group discussions with Secretariat staff, several concerns were expressed that, as the Secretariat and its programme of work has expanded, there has become less clarity on the boundaries between EU policy work, international cooperation work and programme activities and an increased risk of silo-working developing. Suggestions on how to address this included putting in place systems to share information and learnings, build collaboration, and ensure coherence across different programmes of work. In addition, it was suggested that developing an overarching strategy which brings together EU policy work and international cooperation work could help to strengthen synergies and complementarities while clarifying differences across the different areas of work, including in relation to building capacity of DPOs in member countries. It has now been agreed that this strategy development process will commence in November 2023 and will last until November 2024.
* **Reflection and Learning:** Many EDF Secretariat staff members who were interviewed and who participated in the focus group discussion shared that they really valued the opportunity to come together and discuss some of the issues they were experiencing as well as time to reflect together on some critical challenges. It is highly recommended, therefore, that space to continue this type of reflection, engagement and joint learning is integrated into the Secretariat’s workplan at least twice a year.
* **Governance issues:** Overall, it was considered that the governance of EDF is functioning well. However, particularly given recent growth of the organisation, some Executive Committee members also emphasised the need to ensure that there is a structured process for financial decision making and a clear delegation of authority. Work done in relation to the Ukraine grants has helped to improve due diligence processes. One area which requires further work, however, is in ensuring EDF has income management systems in place so that there is clarity on what income is being received and what it is to be used for. Currently it is considered that income management is “done by good people paying attention to it” rather than having clear systems in place. The need to have good financial management systems in place will become increasingly important as EDF diversifies its funding base and increases the amount and types of funding it receives from international development projects and from a wider range of organisations.
* **Reaching other stakeholders/influencers:** One Executive Committee member highlighted the need to reach stakeholders and influencers beyond the disability rights movement. Areas where it was suggested there is a need for strengthening this is in relation to engaging the public and building their support around the disability rights message. It was felt that there is still a lot of work to do to change public attitudes towards disability rights and a question around what is the role that EDF can play in building momentum around calling for disability rights. As one stakeholder questioned, “why is the equality and inclusion message not pushing through and being made as important as climate change?” It may be helpful for EDF to reflect on this and consider whether new strategies, such as strategic litigation or public campaigning, might enable EDF to have greater impact in wider policy environments.

## **3.6 Strategic Direction**

The evaluation’s focus on strategic direction aimed to identify the key issues that EDF should pay attention to for organisational strengthening and future strategy development. Sub-questions considered included:

* What are the key issues with regard to the future sustainability of the organisation that EDF needs to address?
* What are the most significant challenges facing persons with disabilities that EDF, and its member organisations, should be advocating for change on?
* To what extent does the current EDF strategy/CERV workplan reflect these issues?
* Are there key gaps in the current EDF strategy that need to be addressed in the next 4 years?
* Are there specific aspects of the current EDF strategy that are no longer relevant, or that are less relevant for EDF to be focusing on?

### **3.6.1 Sustainability of EDF**

Overall EDF is considered to be working well, effectively and efficiently and the leadership is also aware of where existing gaps are and are working to address these. However, a small number of concerns arose repeatedly throughout the course of this evaluation. These include funding, effective management of the growth of the Secretariat, strengthened engagement with national governments, succession planning within the Executive Committee, and ensuring a wider variety of voices are represented in EDF’s policy influencing activities.

**Funding:** there is a concern that EDF is still reliant on the EC core grant and that should that grant stop (although this is unlikely) there would be limited alternative sources of funding. Several stakeholders highlighted the importance of ensuring a wider diversity of donors supporting EDF, although it was also recognised that a strategy has been developed to address this challenge. A small number of interviewees suggested that, as part of an income diversification strategy, it would be helpful to explore whether there is scope for securing more funding from the private sector. In recent years, the EDF Secretariat has implemented a fund diversification plan which is resulting in a greater diversity of funders, including funding from companies and INGOs such as CBM International.

A second concern expressed about funding related to the increase in funding for programme activities. While this is welcomed, concerns were also raised about the need to ensure that programme funding is strategic and that strengthened relationships between the programme funding activities and the policy activities can be developed – both to ensure sustainability of the programme once funding ends and to ensure that staff do not become overwhelmed by unmanageable or competing workloads. Concerns were also expressed that if EDF is not strategic about the programmes there is a risk that the clarity of the organisation’s narrative may become lost or confused. Specific concerns that were highlighted in this regard included ensuring that EDF is able to balance commitments made to donor organisations with the realities and priorities of the disability movement based on the challenges that persons with disabilities are experiencing in member countries. One example given in this regard is that in a recent meeting with the International Disability Alliance (IDA), there was lots of discussion on food security, climate change and disaster risk reduction but very limited discussion on accessibility, education or employment which are issues that are still very pertinent for persons with disabilities. Another concern expressed in relation to this was that EDF and its programmes are growing in response to emergencies such as the Ukraine war. However, it was felt that for the future, it is important to “see clearly how and where we [EDF] need to go” so that the vision and mission of EDF remains focused on the organisation’s key areas of expertise.

**Managing the growth and expansion of the EDF Secretariat effectively:** This was a critical concern raised by several key stakeholders. EDF is highly regarded for the level of expertise it holds and the quality of its work. However, concerns were highlighted, from both internal and external stakeholders, regarding the recent expansion of EDF and whether the Secretariat has the necessary capacity to accommodate this expansion without the risk of overburdening staff.

Specific areas of concern related to the need for revisions to organisational systems such as decision-making processes, delegations of authority, and lines of responsibility for different areas of work, such as communications and the relationships between policy and programme work and between EU policy and international cooperation work. It was recognised, however, that efforts are already underway to address some of these challenges. An urgent area of need, highlighted on multiple occasions by Secretariat staff and by Executive Committee members is the need to ensure expansion of the Secretariat’s work and staff size is supported by additional resource in key areas such as human resources and events.

**Strengthening engagement with national governments:** As mentioned throughout this report, EDF is having important and well recognised impacts at the EU policy level in Brussels. However, several, mostly internal, stakeholders have highlighted that there will be a limit to the impact EDF can achieve in relation to implementation of key policies and legislation without strengthening national level engagement. This national level engagement is considered critical for strengthening EDF’s ability to engage with and influence the Council. Furthermore, with European Parliamentary elections to be held in 2024, it was considered important to strengthen policy activities at national level in order to be able to influence potential parliamentary candidates who, if elected, would have an important influence over the composition of the European Commission.

It will be important for future strategy development for EDF to consider how it can support member organisations to better engage with their national governments and MEPs to ensure implementation of EU policy so that it impacts positively on persons with disabilities across Europe.

**Executive Committee Succession Planning:** it was highlighted by many stakeholders that whilst EDF has a strong model and very strong and well-respected Executive Committee, there is a need to consider the future make-up of this Committee. In particular, it was felt that there is a need to bring in a greater diversity of disability and age profile to the Executive Committee. It is clear, however, that plans are already in place to address some of these challenges and that the Constitutional Review is a key mechanism for achieving this.

**Representation of a wider variety of voices in policy influencing:** related to the above point, a number of stakeholders highlighted that often EDF representation comes from a small number of individuals. While these individuals are highly regarded and have strong impact, it is also considered important to be building up a wider range of EDF members who can represent their issues effectively at EU and national levels. It is particularly important therefore that in the next strategic period, EDF aims to increase the level of representation from across its membership, with a particular focus on supporting youth with disabilities as well as persons with different types of disability, such as hearing impairments or intellectual disabilities, to meaningfully engage with the policy influencing processes.

### **3.6.2 Key challenges for persons with disabilities in Europe**

Outcomes of key informant interviews, focus group discussions and the member survey all appear to indicate that EDF is highly aware of the challenges faced by persons with disabilities from across Europe and is working well to address these.

Areas that EDF has been working on in recent years, such as the European Disability Card and the Accessibility Act will continue to be critical priorities for persons with disabilities in coming years as well. In addition to the work EDF is currently undertaking, other emerging concerns and challenges arising relate to artificial intelligence and climate change. There is a recognition that **artificial intelligence** is growing in importance and that while there are benefits of AI for persons with disabilities there are also potential challenges that may undermine the rights of persons with disabilities and contribute to their exclusion. It will therefore be important for EDF to continue to be part of these policy discussions to help ensure policies and legislation on AI do not impact negatively on persons with disabilities.

A second issue that was highlighted as important by some stakeholders was **climate change** and, within the overall challenge of climate change, a more specific focus on the digital and green transition that will come about as a result of this. A small number of stakeholders also highlighted a need to be working more closely with industry, especially **technology companies** such as Microsoft and Google, as although legislation exists to ensure technology companies are addressing disability rights where relevant, such legislation is unlikely to be implemented without pressure. Some stakeholders therefore believed that EDF could play an important role in acting as a voice for persons with disabilities with the technology industry.

In terms of rights of persons with disabilities, a small number of stakeholders felt that it was important for EDF to be conducting more work on groups of **people with very high support needs** to identify and advocate for the types of services this group of persons with disabilities require in their communities. Several interviewees also highlighted that EDF doesn’t work on issues that affect **children with disabilities**, despite action taking place at the EU level on this issue. Addressing the challenges faced by **refugees** is another issue that is growing in importance, particularly since the outbreak of war in Ukraine, while one specific area of priority for EDF that was highlighted was the EU **anti-discrimination legislation** and the need to engage with national Council members in order to ensure the anti-discrimination Act is passed with strong and relevant inclusion of persons with disabilities.

As part of the member survey conducted for this evaluation, members were asked to select the three most important issues for EDF to be focusing on. This identified children and youth with disabilities, digital accessibility, freedom of movement and social policy as the most important areas of focus for EDF among the member organisations who responded to the survey (see figure 6).

# **4 Conclusion and Recommendations**

## **4.1 Conclusions**

The overall conclusion of this external evaluation is that EDF is having significant impact on influencing EU policy and legislation in line with the aims and expectations of the CERV programme. Concrete policy and legislative successes have been achieved with the most notable among these including the European Disability Card, the European Accessibility Act, the European Strategy on the Rights of Persons with Disabilities, 2021-2030, and the Fifth European Parliament of Persons with Disabilities. The organisational systems and processes are strong and enable effective delivery against the CERV programme objectives, while EDF Secretariat staff are highly regarded for their level of expertise and efficiency.

Areas of concern identified through this external evaluation fall into 3 key areas:

1. Increasing the diversity of voices representing EDF at the EU policy influencing level.
2. Strengthening member capacity and engagement to influence national policy environments.
3. Effective management of the growth and expansion of EDF.

## **4.2 Recommendations**

**Key recommendations** that can be made based on the findings of this external evaluation process are:

* **Increase the diversity of voices representing EDF at the EU:** Whilst EDF has a strong reputation and is highly regarded by external stakeholders across the EU policy environment in Brussels, several key stakeholders highlighted the need to have engagement from a wider range of EDF members in high-level meetings with EU institutions and EC officials. There is also a need to ensure that the voices of people with disabilities from different perspectives (e.g. younger people with disabilities, older persons with disabilities, LGBTQI, refugees/migrants with disabilities) and with different types of impairment (e.g. hearing impairments, intellectual difficulties) are shared with key EU stakeholders and institutions.
* **Strengthen the engagement of youth with disabilities and persons with intellectual difficulties in EDF activities:** Many internal EDF stakeholders highlighted that whilst there is a youth committee that reports to the EDF board, this committee does not hold a seat on the Executive Committee, and it was noted that the youth committee is not as strong as the Women’s Committee. Internal stakeholders also highlighted a need to create opportunities for persons with intellectual difficulties to engage with key EDF activities, such as the Annual General Assembly, meetings and events organised by EDF, and papers produced by EDF could be strengthened, although it was also recognised that efforts are already in place to address this. Specific recommendations to address these challenges include providing support to the youth committee to create a strong vision and clear actions for what it hopes to achieve. This could be done with mentoring from the women’s committee. To strengthen engagement of persons with intellectual difficulties, it will be important to identify new ways of conducting EDF meetings and events that are more inclusive and to improve the communication of EDF activities and outputs, such as using clearer language or producing easy-read versions of key documents.
* **Conduct a review of capacity-building needs of member organisations:** Member organisation highlighted that they valued the capacity building support provided by EDF, especially on understanding the EU policy environment and how they can engage with this, as well as capacity building on fundraising and organisational strengthening. However, some people within the Secretariat felt that they weren’t entirely sure whether the capacity-building being provided was really meeting the needs of the membership. It is highly recommended, therefore, that EDF conducts a review of the capacity building needs of its membership to assess whether the capacity building support is meeting their needs and to identify potential gaps in the capacity building requirements of members.
* **Develop a clear strategy for strengthening engagement with the Council of the EU (the Council):** Many stakeholders identified that engaging with the Council is a key barrier to securing policy and legislative change, but also highlighted that this cannot be achieved by the Secretariat alone. It is recommended therefore that EDF conduct a situation analysis of what is required to influence the Council and develops a clear strategy, engaging member organisations, to strengthen EDF engagement with the Council.
* **Conduct a review of national level engagement on EU policy influencing:** in order to influence the Council, it is necessary for national member organisations to engage with their national governments. To identify strengths and gaps in relation to this, it is recommended that the EDF Secretariat conduct a review of national members’ capacities to engage at this level, identifying actions that EDF can support or capacity building that needs to be conducted to strengthen national level engagement.
* **Continue the strategic diversification of funding for EDF:** Efforts are currently ongoing to diversify funding for EDF and this should continue. Many people highlighted the concern that should the EC funding not continue, this would mean EDF would likely not continue either, although many also highlighted that they felt this would be unlikely to happen. However, it is also important that as the funding base becomes more diversified that this is also supported by continued clarification on the roles and responsibilities of different teams, and the interaction between teams, to deliver effectively on new sources of funding with detracting from the impact that EDF is having on EU policy and legislation.
* **Invest in specific professional expertise on human resource management:** The lack of professional support for human resources within the Secretariat was identified as a critical challenge that needs to be addressed. Currently HR support and advice is provided by one individual who is already over-burdened. It is essential therefore that, given recent growth of the EDF Secretariat, specific human resource expertise is brought into the Secretariat, ideally on a permanent basis, to support the development and implementation of high-quality human resource policies and practice[[2]](#footnote-2). In addition, all staff in management roles should be provided with training on staff management (including coaching/mentoring), workload prioritisation, and other relevant human resource practices. It should be noted here that, since the evaluation interviews were conducted, plans are already being implemented to address this.
* **Clarify and consolidate inter-team relationships, roles and responsibilities within the Secretariat:** As the EDF Secretariat has grown, there appears to have been a growing lack of clarity on how the different teams relate and interact with each other, with some teams feeling over-burdened and a risk of siloed working developing. It is essential, therefore, that the structure of the Secretariat is clarified, with areas of synergy/overlap and how teams should work together clearly defined.
* **Invest in time for review, reflection and learning within the Secretariat:** Many of the EDF Secretariat staff felt that there was not enough time on a daily basis and throughout the course of the year to reflect on progress of activities and draw out learnings from their work. Opportunities to do this during the external evaluation were highly valued. Given the recent growth in the Secretariat it becomes even more important to build in clear opportunities throughout the course of the year to allow time and space to review progress of activities, reflect on the impact that is being achieved and draw out lessons learned that can help strengthen future activities. It is highly recommended therefore that at least once a quarter, the EDF Secretariat holds a ½ -1-day meeting to review work and draw out lessons learned. Critically important to the success of these meetings, however, is allowing time prior to the meetings for EDF Secretariat staff to prepare their reflections and contributions to the meetings.

# **Annex 1: List of Key Informant Interviews Conducted**

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| **Name** | **Role** | **Organisation** |
| **External Stakeholders** |  |  |
| Hana Velecka | Project Manager | European Commission, Disability & Inclusion Unit |
| Immaculada Placencia-Porrero | Senior Advisor | European Commission, Disability and Inclusion Unit |
| Valeria Atzori | Policy Officer | European Economic and Social Committee, Employment, Social and Affairs and Citizenship Unit |
| Ainars Freimanis | Policy Officer | European Commission DG for Communications Networks, Content & Technology Accessibility, Multilingualism & Safer Internet; Web Accessibility Directive Team |
| Nadia Harizanova |  | European Commission DG for Communications Networks, Content & Technology Accessibility, Multilingualism & Safer Internet; Web Accessibility Directive Team |
| Andras Mogyoro | Policy Officer | DG Move – Unit B5 |
| Chiara Giovannini | Senior Manager, Policy & Innovation; Deputy Director-General | ANEC  |
| Julie Wadoux | Policy Manager on Healthy Ageing | AGE Platform Europe |
| Tamas Kadar |  | Equinet Europe |
| Anne Gaspard |  | Equinet Europe |
|  |  |  |
| **EDF Board & Executive Committee** |  |  |
| Yannis Vardakastanis | President, EDF | National Confederation of Disabled People (ESAMEA) |
| Gunta Anca | Vice-President, Executive Committee | Latvian Umbrella Body for Disability Organisations - SUSTENTO |
| Maureen Piggott | Treasurer, Executive Committee | Inclusion Europe |
| Pat Clarke | Vice-President, Executive Committee | European Down Syndrome Association |
| Pirkko Mahlamaki | Executive Committee Member | Finnish Disability Forum |
| Thorkild Olesen | Executive Committee Member | Disabled Peoples Organisation Denmark (DPOD) |
| Vera Bonvalot | Executive Committee Member | Brain Injured and Families European Confederation (BIF) |
|  |  |  |
| **EDF Members** |  |  |
| Aurélie Baranger |  | Autism Europe |
| Milan Sverepa |  | Inclusion Europe |
|  |  |  |
| **EDF Secretariat** |  |  |
| Alejandro Moledo | Deputy Director & Head of Policy | EDF Secretariat |
| Andre Felix | Communications Coordinator | EDF Secretariat |
| Carine Marzin | Project Manager, Web Accessibility Initiative Communities of Practice | EDF Secretariat |
| Marine Uldry | Human Rights Policy Coordinator | EDF Secretariat |
| Marion Steff  | International Cooperation Manager | EDF Secretariat |
|  |  |  |

1. These four committees are the Human Rights and Non-Discrimination Committee, the Social Policy and Inclusion Committee, the Women’s Committee and the Youth Committee. [↑](#footnote-ref-1)
2. Recruitment has recently been completed for an Executive Secretary to take on some of these responsibilities. [↑](#footnote-ref-2)