



Recommendations for the EU Gender Equality Action Plan IV

European Disability Forum Position Paper
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**EDF response to call for evidence EU Action Plan for
Gender Equality and Women's Empowerment in EU
External Action 2028 – 2034 (GAP IV).**

Table of Contents

Table of Contents	2
Introduction.....	2
Executive summary.....	3
Background.....	4
GAP III Achievements must be preserved and strengthened	4
2025 CRPD Committee recommendations to the EU	6
Recommendations for GAP IV.....	6
1. Make intersectionality a core principle of GAP IV	6
2. Ground GAP IV in a human rights-based approach	7
3. Apply a Twin-track approach	7
4. Guarantee meaningful and accessible participation and consultation of organisations of women with disabilities.....	7
5. Provide dedicated and accessible funding for representative organisations of women with disabilities	8
6. Maintain strong ODA targets and improve financial tracking	8
7. Ensure inclusion across climate action, poverty reduction, health, education, employment and peacebuilding	9
8. Establish disability inclusive data collection and accountability	10
9. Strengthen Gender and Disability funding markers.....	10
10. Build institutional capacity for implementation	11
Resources.....	12
Document credits	13

Introduction

The European Disability Forum

The European Disability Forum is an independent NGO that advocates for the rights of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Acknowledgements

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Executive summary

The forthcoming EU Gender Equality Action Plan IV (GAP IV) represents an important opportunity for the European Union to strengthen its global leadership on gender equality, women's rights and inclusive international cooperation.

The EU's Gender Equality Action Plan 2020–2025 (GAP III) created important momentum, stronger policy frameworks, better gender mainstreaming and improved accountability mechanisms. These achievements should not be lost. GAP IV must therefore be ambitious, well-resourced and forward-looking.

For GAP IV to succeed, it must explicitly include women and girls with disabilities across all priorities, financing tools, implementation systems and monitoring frameworks. Women and girls with disabilities continue to face multiple and intersecting forms of discrimination based on gender and disability, often compounded by poverty, age, race, ethnicity, migration status, displacement or living in rural and conflict-affected areas.

The European Disability Forum calls on the EU to ensure GAP IV becomes the first fully disability-inclusive Gender Action Plan, grounded in intersectionality, a gender-transformative approach and a human rights-based approach, in line with the United Nations Convention on the Rights of Persons with Disabilities (CRPD), CEDAW, Agenda 2030 and EU equality commitments.

This requires GAP IV to be firmly grounded in a human rights-based approach, with clear references to the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and guided by the principles of intersectionality and gender-transformative action. It also requires meaningful participation of women and girls with disabilities and their representative organisations, dedicated and accessible funding, the maintenance of strong ODA targets, improved use of gender and disability markers, stronger monitoring and disaggregated data systems, and full inclusion across poverty reduction, education, health, employment, social protection, humanitarian action, peacebuilding and recovery. Finally, it requires building the institutional capacity of EU actors to implement GAP IV effectively and inclusively.

Background

Women and girls with disabilities make up a significant share of the global population, yet they continue to be systematically overlooked in many gender equality policies, programmes and funding frameworks. Globally, approximately **one in five women live with a disability (19.2%)**, compared with around 11% of men. This means that hundreds of millions of women and girls worldwide live at the intersection of gender inequality and disability discrimination.

The barriers they face are social, economic, institutional and attitudinal. In many countries, girls with disabilities are less likely to enrol in school, more likely to leave education early, and less likely to transition into decent work. Women with disabilities experience lower labour market participation, higher rates of poverty and economic dependency, and more limited access to land, finance, digital tools and entrepreneurship opportunities.

They also face serious violations of bodily autonomy and safety. Women and girls with disabilities are disproportionately exposed to gender-based violence, domestic abuse, sexual exploitation, forced sterilisation, neglect and institutional violence. Many cannot access police services, shelters, justice systems or survivor support because these systems remain physically, financially and socially inaccessible.

Healthcare barriers remain widespread. In many settings, women with disabilities are denied accessible sexual and reproductive health information, access to gender-based violence services and shelters, maternal healthcare, family planning services and informed consent in medical decision-making. Harmful stereotypes and practices such as forced sterilisation, continue to portray women with disabilities as asexual, incapable of parenting or unable to participate fully in society.

At the same time, women and girls with disabilities are leaders, advocates, workers, caregivers, entrepreneurs and agents of change in their communities. GAP IV should recognise and support this leadership potential rather than framing disability only through vulnerability.

Gender equality cannot be achieved while hundreds of millions of women and girls with disabilities remain excluded.

GAP III Achievements must be preserved and strengthened

GAP III has delivered important progress in integrating gender equality across EU external action and has helped position the European Union as a leading global actor on gender equality and women's rights. It increased

the political visibility of gender equality in external relations, strengthened institutional accountability, promoted the use of gender equality markers, and supported a more strategic and coherent approach across development cooperation, humanitarian action and international partnerships.

GAP III also established important guiding principles that should be preserved and strengthened in the next framework. In particular, its commitment to **intersectionality**, a **gender-transformative approach**, and a **human rights-based approach** provided a valuable foundation for addressing structural inequalities and advancing more inclusive policies. These principles remain essential for the credibility and effectiveness of future EU external action.

At the same time, the implementation of GAP III demonstrated that women and girls with disabilities were not systematically included across priorities, funding decisions, country strategies or monitoring systems. While references to diversity were welcome, they were not sufficient to ensure meaningful inclusion, targeted action or measurable progress. As a result, many of the barriers faced by women and girls with disabilities remained insufficiently addressed.

GAP IV offers an important opportunity to build on the achievements of GAP III while correcting these shortcomings. A strong successor framework is needed to ensure that existing gains are not lost and that the next phase of EU external action becomes genuinely inclusive, ambitious and effective.

A disability-inclusive GAP IV would also bring EU external action into closer alignment with international human rights standards and existing policy commitments. This includes the CRPD, in particular Article 6 on women with disabilities and Article 32 on inclusive international cooperation, as well as CEDAW, the Sustainable Development Goals, the EU Gender Equality Strategy, the EU Strategy for the Rights of Persons with Disabilities, and the EU Action Plan on Human Rights and Democracy.

Disability inclusion is not a marginal or sectoral issue. It is central to poverty reduction, democratic participation, access to justice, education outcomes, healthcare access, labour market inclusion, humanitarian response and sustainable development. If women and girls with disabilities continue to be excluded, the impact of EU external gender policy will remain partial and unequal.

By contrast, if disability inclusion is embedded in GAP IV from the outset, the EU can set a global benchmark for feminist, rights-based and inclusive foreign policy.

2025 CRPD Committee recommendations to the EU

In 2025, the United Nations issued its Concluding Observations on the European Union. These recommendations are highly relevant to the development of GAP IV and should guide the EU's next steps.

The Committee raised concerns that women and girls with disabilities continue to face discrimination across multiple policy areas, and that EU gender equality and disability frameworks do not yet adequately protect their rights. It noted that previous EU policy initiatives did not sufficiently address multiple and intersectional discrimination, nor consistently reflect the views and experiences of women and girls with disabilities.

The Committee also highlighted gaps in data collection and monitoring, which make it difficult to measure progress. Without disability-, gender- and age-disaggregated data, many forms of exclusion remain invisible in practice.

Importantly, the Committee called on the EU to ensure meaningful consultation with persons with disabilities through their representative organisations, including women-led organisations. It also urged the EU to strengthen protection from violence and abuse, address poverty and labour market exclusion, and mainstream disability rights across all areas of internal and external action.

These recommendations should be directly reflected in GAP IV through clear objectives, operational guidance, measurable indicators and funding commitments.

Recommendations for GAP IV

1. Make intersectionality a core principle of GAP IV

GAP IV should explicitly recognise that **women and girls with disabilities face multiple and intersecting forms of discrimination**. Gender inequality is often compounded by disability, age, race, ethnicity, migration status, poverty, sexual orientation, rural location, conflict or displacement.

An **intersectional approach** should guide all priorities, country strategies, funding decisions and monitoring systems. This is essential to ensure that those facing the greatest barriers are not left behind.

In practice, all **GAP IV country implementation plans, Team Europe strategies, Global Gateway initiatives and programming documents** should include an intersectional gender analysis together

with concrete measures for disability inclusion. This should involve meaningful consultation with local organisations of persons with disabilities (OPDs), accessibility planning, risk assessments, measurable objectives, dedicated indicators and adequate budget allocations.

Intersectionality is a core principle of the EU Strategy for the Rights of Persons with Disabilities 2021–2030. GAP IV should strengthen coherence between these frameworks through aligned implementation, monitoring and accountability mechanisms across all relevant external actions.

2. Ground GAP IV in a human rights-based approach

GAP IV should be firmly grounded in a human rights-based approach that recognises **women and girls with disabilities as rights-holders and agents of change**, rather than as passive beneficiaries of support. EU external action should move beyond charity-based or welfare-oriented models and instead focus on dismantling the structural, legal, social and environmental barriers that prevent full equality and participation.

Across all areas of implementation, GAP IV should promote equality, autonomy, legal capacity, bodily integrity, accessibility, freedom from violence and the full and effective participation of women and girls with disabilities in society.

To ensure a strong normative foundation, the Action Plan should contain clear and consistent **references to the United Nations Convention on the Rights of Persons with Disabilities (CRPD)** throughout the text, in particular Articles 6, 9, 12, 16, 24, 27, 29 and 32. Explicit alignment with the CRPD would strengthen implementation, reinforce accountability and ensure coherence between EU external action and international human rights obligations.

3. Apply a Twin-track approach

The EU should combine two complementary strategies: mainstream disability inclusion across all gender equality programmes and sectors, while also funding targeted actions specifically supporting women and girls with disabilities.

Mainstreaming alone is not sufficient to address structural exclusion.

4. Guarantee meaningful and accessible participation and consultation of organisations of women with disabilities

Women and girls with disabilities and their representative organisations must be meaningfully involved at every stage of GAP IV design. The

participation of women and girls with disabilities should extend to political dialogue, programme design, monitoring committees, review processes and all other decision-making spaces relevant to EU external action.

Consultation must be timely, inclusive, adequately resourced and capable of influencing outcomes. To make participation effective in practice, all consultations, calls for proposals, communications, events, digital platforms and accountability mechanisms under GAP IV must be fully accessible.

This includes the provision of sign language interpretation, captioning, accessible documents, Easy-to-Read formats, accessible websites, physical accessibility and other necessary support measures. Reasonable accommodation should be systematically available to ensure equal participation of women and girls with disabilities in all GAP IV processes.

5. Provide dedicated and accessible funding for representative organisations of women with disabilities

The EU should establish accessible, flexible and predictable funding mechanisms under GAP IV for organisations of persons with disabilities (OPDs), in particular organisations led by women with disabilities, grassroots disability organisations and alliances between disability rights and feminist movements.

Funding should be designed to reduce administrative barriers and include opportunities for core, multiannual and project-based support. The EU should recognise women and girls with disabilities as experts, leaders and agents of change, and support the capacity development of organisations led by women with disabilities. Funding should enable advocacy, movement-building, leadership development, monitoring, community outreach and meaningful participation in policy and decision-making processes.

6. Maintain strong ODA targets and improve financial tracking

The EU should maintain the target that 85% of Official Development Assistance supports actions with gender equality as a significant or principal objective and increase the share of gender-targeted funding. Within these targets, disability inclusion should be systematically reflected. GAP IV should use both gender and disability markers, including tracking funding that advances both objectives simultaneously.

7. Ensure inclusion across climate action, poverty reduction, health, education, employment and peacebuilding

GAP IV should ensure that women and girls with disabilities are fully included across all priority areas of EU external action, including poverty reduction, gender-based violence prevention, sexual and reproductive health and rights, education, employment, entrepreneurship, social protection, climate action, disaster risk reduction, humanitarian action, peacebuilding and recovery, including through Global Gateway investments and related initiatives. All services and programmes supported through EU external action must be accessible, rights-based and responsive to the specific barriers faced by women and girls with disabilities.

To tackle poverty and economic exclusion, the EU should support community-based and inclusive services that enable women with disabilities to access vocational training, entrepreneurship opportunities and the open labour market. GAP IV should also promote targeted measures that support the transition of girls and young women with disabilities from education to decent work, including skills development, mentoring and inclusive recruitment pathways.

Recognising the disproportionate care responsibilities often carried by women, the EU should support policies that value and compensate unpaid care work, including adequate income support, social protection and pension rights for women caring for children, older persons or relatives with support needs. At the same time, GAP IV should promote investment in quality, accessible and community-based care and support systems that reduce unpaid care burdens and enhance independent living.

In line with human rights standards, EU-funded actions should support deinstitutionalisation and the development of community-based alternatives, with no investment in institutions or segregated settings. Women and girls with disabilities must be able to live independently, participate in their communities and access mainstream services on an equal basis with others.

In health and sexual and reproductive rights, GAP IV should prohibit practices based on substituted decision-making and promote supported decision-making mechanisms, particularly in sexual and reproductive healthcare. Women with disabilities must have access to free and informed consent, bodily autonomy and accessible health information and services.

GAP IV should also ensure the full inclusion of women and girls with disabilities in climate action, environmental sustainability, disaster risk reduction and resilience-building efforts. This includes accessible early

warning systems, inclusive emergency preparedness and response, participation in climate decision-making processes, and targeted support for those disproportionately affected by climate-related disasters, displacement and loss of livelihoods.

In fragile, conflict-affected and post-conflict contexts, women and girls with disabilities should be fully included in peacebuilding, humanitarian response, recovery and Women, Peace and Security initiatives, including through direct participation in decision-making and access to protection and support services.

8. Establish disability inclusive data collection and accountability

GAP IV should establish robust systems for collecting, analysing and publishing disability-, gender- and age-disaggregated data across all relevant actions. Data collection should be based on internationally recognised methodologies, including the Washington Group Questions where appropriate, to improve comparability and visibility of persons with disabilities.

The EU should support partner countries, national statistical offices and EU Delegations to strengthen inclusive data systems and conduct intersectional analysis that captures the lived experiences of women and girls with disabilities.

Indicators should measure both participation and outcomes, including access to services, education, employment, leadership roles, safety, income generation, representation in decision-making and policy influence. Data should be used systematically to inform programming, monitor progress and strengthen accountability under GAP IV.

9. Strengthen Gender and Disability funding markers

The EU should apply and further strengthen robust financial tracking tools across all EU external action programmes, initiatives and spending instruments, building on the existing use of the OECD DAC gender equality policy marker and the OECD DAC disability inclusion marker. This should include:

- systematic use of the gender equality marker across relevant programmes;
- consistent application of the disability inclusion marker;
- analysis of funding that advances both gender equality and disability inclusion simultaneously;

- reporting on resources that specifically reach women and girls with disabilities and their representative organisations.

Strengthened use of these markers would improve transparency, accountability and evidence-based decision-making.

10. Build institutional capacity for implementation

EU Delegations, European Commission services, the European External Action Services, implementing partners and Team Europe actors should receive training, guidance and adequate resources on disability-inclusive gender programming. Gender focal points should be equipped to apply intersectional approaches, engage with OPDs and monitor disability inclusion effectively.

EU Delegations should also have clear responsibilities for implementing GAP IV at country level, including systematically integrating disability inclusion into Gender Country Profiles, Country Level Implementation Plans (CLIPs), Team Europe Initiatives, Global Gateway programmes and other relevant programming frameworks. This should include regular consultation with local organisations of women with disabilities, measurable objectives, accessible processes and transparent reporting on progress.

Resources

EDF publications:

- [EDF Recommendations for the EU Gender Equality Strategy 2026–2030](#) (2025)
- [Third EDF Manifesto on the Rights of Women and Girls with Disabilities](#) (2024)
- [Report on Forced Sterilisation in the European Union](#) (2022)
- [EDF Guidance on the Directive on Combatting Violence Against Women](#) (2025)
- [EDF Position Paper on Gender Stereotypes against Women with Disabilities](#) (2025)

Other resources

- Committee on the Rights of Persons with Disabilities, [Concluding Observations on the combined 2nd and 3rd period reports of the European Union](#) (2025)
- UNICEF, International Disability Alliance et al., [The Global Disability Inclusion Report: Accelerating disability inclusion in a diverse and changing world](#) (2025)
- UN Women, [30 Years of Beijing Platform for Action: An intersectional approach to gender and disability inclusion](#) (2025)
- UNDESA, [Disability & Development Report 2024](#)
- WHO [Global report on health equity for persons with disabilities](#) (2022)

Document credits

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