



Recommendations of the European Network on Independent Living (ENIL) to the Irish Presidency of the EU Council

Disabled people in the EU face serious challenges and rights restrictions:

- According to Eurofound, the number of disabled people confined to institutions has increased by 29% in the last decade¹
- Between 2010 and 2023 the disability employment gap has increased from 18,6% to 24,5%²
- According to Eurostat, in 2024 28,8% were at risk of poverty, compared to 17.9% of nondisabled people³

The exclusion of disabled people has consequences for the individuals affected but also for our economies:

- According to the OECD, the EU is suffering a loss of GDP of 0,84-1,42 billion per year, causing losses in tax revenue of EUR 302-493 million⁴

There are many measures that could improve the situation:

- Better access to assistive technologies and artificial intelligence

¹ Eurofound 2024. Paths towards Independent Living and social inclusion. <https://www.eurofound.europa.eu/en/publications/all/paths-towards-independent-living-and-social-inclusion-europe>

² ENIL 2025. Advocacy Campaign for Inclusive Employment takes shape. <https://enil.eu/advocacy-campaign-for-inclusive-employment-takes-shape/>

³ Eurostat 2025. Disability Statistics. Poverty and income inequalities. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability_statistics_-_poverty_and_income_inequalities

⁴ OECD 2025. Combatting Discrimination in the European Union. https://www.oecd.org/en/publications/combating-discrimination-in-the-european-union_29c2c36a-en.html



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- Better access to Independent Living Services, especially personal assistance, personal budgets, Centres for Independent Living
- Better access to supported employment
- Better access to accessible and affordable housing

There is new evidence from economics research according to which personal assistance produces productivity gains of EUR 535 million and EUR 405 million of budget savings within a ten-year period.⁵

ENIL does research on and monitors the access to and the quality of disability services. Our Independent Living Survey, the Independent Living Roadmap and the Policy Report on new pathways for the labour market inclusion of disabled people gathered important insights⁶.

According to our research, across the EU there are severe implementation gaps when it comes to Independent Living Services:

- There is insufficient access to assistive technologies
- The quality of personal assistance schemes is low
- Few countries have nation-wide personal budget schemes
- Supported employment programs remain small compared to segregated employment

⁵ Rasmussen et al. 2025: Samfunnsøkonomisk analyse av BPA-ordningen. <https://www.vista-analyse.no/no/publikasjoner/samfunnsokonomisk-analyse-av-bpa-ordningen/>

⁶ Compare: ENIL 2024. Summary report – Independent Living Survey 2024: Disabled People’s Perceptions of Independent Living in Europe. <https://enil.eu/il-map/>; ENIL 2025. New policy pathways for the labour market inclusion of disabled people. <https://enil.eu/wp-content/uploads/2025/10/New-policy-pathways-for-the-labour-market-inclusion-of-disabled-people.pdf>; ENIL 2025. Independent Living Roadmap. <https://enil.eu/wp-content/uploads/2026/01/A-roadmap-on-Independent-Living.pdf>



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- There is great need for more social and non-profit housing built according to universal design standards

We are recommending to the Irish Presidency of the EU Council to:

- Contribute to improving financing and market conditions for assistive technologies and human rights compliant AI usage by ensuring coverage under the Euro-pean Innovation Act, the European Research Area Act and the Public Procurement Act
- Support a Multiannual Financial Framework that mobilises investments in Personal Assistance, Personal Budgets and Centres for Independent Living. We need binding rules for National and Regional Partnership Plans to contribute to the implementation of the UN CRPD
- Work towards a State Aid-General Block Exemption Regulation that incentivises investments in supported employment
- Help to amend the Proposal for a Council Recommendation on Housing Exclusion to ensure it contains approaches to tackling homelessness of disabled people. Contribute to a simplification package that supports universal design standards in housing.



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1. For inclusive and human rights affirming assistive technologies and artificial intelligence

As an organisation committed to the rights of disabled people, independent living, and the implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD), we urge the Irish Presidency to make inclusive and rights-based assistive technology policy a key priority during its 2026 Presidency.

Assistive technologies (AT) and artificial intelligence (AI) are increasingly shaping participation in education, employment, communication, mobility, housing, and public life. These technologies can significantly strengthen autonomy and inclusion. However, without a strong human rights framework, they can also reinforce surveillance, dependency, discrimination, and institutionalisation, [as we explored in our Artificial Intelligence and Independent Living fact sheet](#).

The Irish Presidency has an important opportunity to promote a European approach grounded in the principles of independent living, accessibility, dignity, and “Nothing Without Us.”

We call on the Irish Presidency to:

- Recognise access to assistive technology as a human rights issue linked to CRPD rights, including accessibility, independent living, communication, education, employment, and participation in society.
- Promote affordable, and publicly funded assistive technologies, including AI-enabled tools such as captioning, speech-to-text, augmentative and alternative communication (AAC), sign language technologies and more.
- Ensure that disabled people and our representative organisations are meaningfully involved in the design, governance, procurement, and evaluation of assistive and AI technologies at EU level.
- Support open standards, interoperability, and open-source accessibility solutions in order to reduce costs, prevent digital exclusion, and strengthen user choice and control.
- Guarantee that AI systems used in public services are accessible, transparent, explainable, and subject to human oversight, particularly where decisions affect disabled people’s rights and access to services.



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- Oppose the use of AI and digital technologies for surveillance, behavioural monitoring, or other practices that undermine privacy, autonomy, legal capacity, and independent living.
- Ensure that EU digital and innovation funding supports community living and accessibility, and does not contribute to segregation or institutional models of care.
- Promote strong protections for disability-related data, including biometric, behavioural, communication, and mobility data collected through assistive technologies and AI systems.

We also encourage the Irish Presidency to initiate discussions on a long-term European framework on disability, assistive technology, and human rights, developed in partnership with disabled people's organisations and independent living movements across Europe.

Technology must support freedom, participation, and self-determination, not replace human support, restrict autonomy, or create new forms of exclusion. Europe's digital future must be built with disabled people, not for disabled people.

We believe Ireland can play a leading role in advancing a rights-based and inclusive vision for assistive technology and AI within the European Union.



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2. For an EU Multiannual Financial Framework that supports equal treatment, social inclusion and competitiveness

Together with allied organisations, ENIL has adopted detailed amendments to three Multiannual Financial Framework (MFF) Regulations:⁷ 1. The National Regional Partnership Plan Regulation (NRP-R), 2. The Budgetary Tracking and Performance Framework, 3. Global Europe.

Commitments to implement the adopted legislation

The European Union has committed itself to implement:

1. The provisions on the equal treatment of disabled people expressed in the Treaty on the Functioning of the EU (TFEU) and in the EU Charter on Fundamental Rights
2. The United Nations Convention on the Rights of Persons with Disabilities (UN CRPD)
3. The European Commission Notice “Guidance to Member States on Independent Living and Inclusion in the Community”

Especially the UN CRPD in conjunction with the authoritative General Comments and Guidelines issued by the Committee on the Rights of Persons with Disabilities contains a detailed policy roadmap for:

- The introduction of community-based services, especially personal assistance
- Deinstitutionalisation
- Supported employment

For the moment, neither of the three regulations, the NRP-R, the Performance Framework or Global Europe, adequately reflect those commitments.

We recommend amendments:

The NRP-R

The National and Regional Partnership Plans should make an active contribution to the implementation of the adopted legislation, especially the UN CRPD.

We recommend for example:

- Amending Article 7(1)(c new) on Horizontal principles stating that “Member States shall design the NRP Plan ... in a way that ensures respect of ... (c new) ***the norms and principles set out in the United Nations Convention on the Rights of Persons with Disabilities and***

⁷ ENIL 2026.



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the authoritative documents issued by the UN Committee on the Rights of Persons with Disabilities”.

- Amending Article 8(1)(1a new) on Respect for the Charter of Fundamental Rights stating that “Member States shall put in place and maintain effective mechanisms to ensure compliance ... with the relevant provisions of the Charter of Fundamental Rights ***and of the United Nations Convention on the Rights of Persons with Disabilities and authoritative documents issued by the UN Committee on the Rights of Persons with Disabilities”.***
- Amending article 10(5) on Budget by 1. Increasing the envelope for spending on the Union’s social objectives from 14% to 25%, 2. Adding that this spending is also available for “equal treatment and fundamental rights objectives” and that **“At least 10% of the Union’s social spending shall be dedicated to the implementation of the UN CRPD in the EU.”**

The Budgetary Tracking and Performance Framework

EU disability policy is suffering from an insufficient evidence base. We recommend initiating regular data collection for example on:

1. The amount of EU Funds going into institutions and the number of people in institutions
2. The amount of EU Funds going into personal assistance, personal budgets and Centres for Independent Living and the amount of users of these services
3. The amount of EU Funds going into housing that is affordable and accessible for persons with disabilities and the amount of people benefiting from affordable and accessible housing
4. The amount of EU Funds going into supported employment and the amount of people benefiting from such measures

The Global Europe programme

We recommend for example:

- Amend article 4, 1b “Objectives of the instrument” and include the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD). Article 4, 1b states that



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Global Europe should contribute to the promotion of multilateralism and lists various international agreements the EU has concluded and whose implementation the programme should support. The UN CRPD is not listed. That is a missed opportunity which should be corrected.

- Amend Article 9 (4) “General Principles” and list “equal treatment and social inclusion”, “Independent Living”, “personal assistance” and “deinstitutionalisation” as actions to be promoted
- Amend articles 9 - General Principles - 5 and 6 by stating that “the instrument shall promote gender equality and girls` and women`s empowerment ***with a particular focus on the equal treatment of women with disabilities***”



3. Reforming EU state aid legislation to boost supported employment

According to the 2025 European Commission study on alternative employment models for persons with disabilities, supported employment has outstanding success rates when it comes to integrating disabled people into work in the regular labour market. Some programmes succeed in integrating up to 65% of participants into employment.⁸

Defining supported employment

General Comment No 8 on the right of persons with disabilities to work and employment, issued by the UN Committee on the rights of persons with disabilities in 2022, states that state parties must take measures to ensure that disabled people can access employment in the open labour market.

According to Eurofound, supported employment can be defined as “a method of working with groups in disadvantaged situations to enable them to enter and maintain paid employment in the open labour market. Its concept is based on the premise that successful job attainment is achieved when adequate support is given to both the employer and the employee”.⁹

The General Block Exemption Regulation

The General Block Exemption Regulation (GBER) is one of the cornerstones of the EU legislative acquis on state aid.¹⁰ To promote public policy objectives, the General Block Exemption Regulation defines and lists specific sectors and activities for which state aid is permitted and which are exempt from notification requirements.

The GBER lists measures to support the employment of disabled people which are in line with General Comment No 8 and the definition provided by Eurofound:

- Wage subsidies
- Personal assistance at work

⁸ European Commission 2025. Study on alternative employment models for persons with disabilities. <https://op.europa.eu/cs/publication-detail/-/publication/1cc9efd9-1b5d-11f0-b1a3-01aa75ed71a1/language-en>

⁹ Eurofound 2021. Disability and labour market integration: Policy trends and support in EU Member States <https://www.eurofound.europa.eu/en/publications/all/disability-and-labour-market-integration-policy-trends-and-support-eu-member>

¹⁰ European Union. EUR Lex. General Block Exemption Regulation. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:0802_4



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- The Purchase of assistive equipment
- Modifications of the built environment
- Transport
- Rehabilitation

The problem of segregated employment

It also lists a measure which, according to General Comment No 8 has to be regarded as segregated employment and not in line with the UN CRPD:

“where the beneficiary provides sheltered employment, the costs of constructing, installing or modernising the production units of the undertaking concerned, and any costs of administration and transport, provided that such costs result directly from the employment of workers with disabilities.”

According to the European Commission study on alternative employment models, sheltered employment is highly ineffective in securing transitions into employment in the open labour market. Success rates barely exceed 1%.¹¹

Despite the available evidence, authorities spend almost the entire budgets earmarked for the labour market integration of disabled people on segregated employment.

The EASPD study “Fostering Employment through Sheltered Workshops: Reality, Trends and Next Steps” concluded: “funds dedicated to supported employment measures targeted towards integration and inclusion in the open labour market remain marginal.” Some countries spend between 96% and 98% of their earmarked budgets on segregated employment.¹²

Reforming the GBER

The European Commission is in the process of reforming the GBER.¹³ Since the GBER is a Commission Regulation, the co-legislators are not involved. The Member State can influence the

¹¹ European Commission 2025. Alternative employment models. P. 41

¹² EASPD 2023. Fostering Employment through Sheltered Workshops: Reality, Trends and Next Steps <https://easped.eu/resources-detail/fostering-employment-through-sheltered-workshops-reality-trends-and-next-steps/>

¹³ https://competition-policy.ec.europa.eu/public-consultations/2026-gber_en



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outcome through an advisory committee.¹⁴ The Commission has published a draft regulation for consultation purposes.¹⁵

In 2024 and 2025, ENIL published policy reports recommending changes to the GBER to incentivise greater investments in supported employment. We recommended completely removing article 34(f) of the regulation currently in force.¹⁶

In reaction to the draft regulation published this year, we recommend the following changes:

- Amend the new article 48(3)(f) by replacing the term “sheltered employment” with “supported employment”:

“where the beneficiary provides sheltered **supported** employment, the costs of constructing, installing or modernising the production units of the undertaking concerned, and any costs of administration and transport, provided that such costs result directly from the employment of workers with disabilities.”

- Amend article 2(10)(108) and include the following definition:

‘sheltered **supported** employment’ *refers to measures designed to assist persons with disabilities in accessing and retaining employment or training in the open labour market on a basis equal to others or to assist the employer in employing persons with disabilities. Measures are predominantly provided while the person with disability is working in a position, for example personal assistance at work, job coaching or wage subsidies. Measures provided before a person is working in a position, for example resume or job search assistance or customising employment must be directly linked to the uptake of work or training. Preparatory jobs in segregated settings are not supported employment.*

We urge the Irish Presidency of the EU Council to support our position in the sessions of the Advisory Committee.

¹⁴ Commission expert groups in State aid: Advisory Committees and Multilateral Meetings. https://competition-policy.ec.europa.eu/state-aid/legislation/commission-expert-groups-state-aid_en

¹⁵ https://competition-policy.ec.europa.eu/document/download/13d86416-7f23-466e-83aa-0af8105b72d2_en?filename=empty_file_en.pdf

¹⁶ Comp. ENIL 2024. Reforming EU State Aid law to restrict subsidies to sheltered workshops. <https://enil.eu/reforming-eu-state-aid-law-to-restrict-subsidies-to-sheltered-workshops/>; ENIL 2025. New policy pathways for the labour market inclusion of disabled people <https://enil.eu/wp-content/uploads/2025/10/New-policy-pathways-for-the-labour-market-inclusion-of-disabled-people.pdf>



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4. For accessible and affordable housing and Independent Living

Disabled people face a disproportionate risk of housing exclusion and homelessness across the European Union. Limited access to adequate, affordable and accessible housing can increase the risk of institutionalisation and undermine the right to Independent Living. Accessible and affordable housing is an essential element of successful deinstitutionalisation and equal participation in society.

EU housing policy currently lacks a sufficient evidence base regarding the situation of disabled people.

- Better and more systematic data collection is needed to understand barriers to housing access and to support evidence-based policymaking.
- Strengthening the collection and use of disaggregated data on housing exclusion, homelessness, accessibility barriers, energy poverty and institutionalisation risks among disabled people.

The simplification package

The simplification package should contribute to strengthening accessibility standards in housing.

We recommend:

- Recognising universal design as a commonly accepted standard in housing initiatives, construction and renovation.
- Ensuring that simplification measures do not weaken accessibility requirements, universal design principles and reasonable accommodation obligations.

European Affordable Housing Plan and The Affordable Housing Act

The European Affordable Housing Plan and the Affordable Housing Act should actively contribute to Independent Living and social inclusion.

We recommend:

- Supporting long-term investments in social and non-profit housing developed according to accessibility and universal design standards.
- Ensuring the systematic inclusion of disability and Independent Living principles in housing and anti-poverty measures.
- Supporting Member States in combining housing measures with personal assistance and other forms of individualised support



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- Promoting accessibility requirements for new housing developments through the inclusion of a defined share of accessible housing units, in line with universal design principles and the objective of fostering inclusive mixed communities. Such measures may support independent living, improve equal access to housing for disabled people, and contribute to more inclusive and socially cohesive urban communities. Particular attention should be given to ensuring effective implementation and adequate availability of accessible housing across both urban and rural areas.

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About the European Network on Independent Living

The European Network on Independent Living (ENIL) is a disabled-led, cross-disability network of disabled people and their representative organisations. ENIL promotes the right to independent living, as set out in Article 19 of the UN Convention on the Rights of Persons with Disabilities (CRPD), its General Comments and the Guidelines on deinstitutionalisation, including in emergencies. ENIL's work is guided by the CRPD and the Independent Living principles, enshrined in the Independent Living Pillars. ENIL is active at the European level, and internationally, through cooperation with Centres for Independent Living from around the globe. ENIL's actions and activities are based on the social and the human rights models of disability, and on the principles of inclusive equality, self-determination, solidarity and intersectionality.

ENIL has participatory status with the Council of Europe (i.e. is a member of the Conference of INGOs) and consultative status with ECOSOC.

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