



The voice of blind and partially sighted people in Europe

**Monitoring of the Rights of Blind and Partially-Sighted
People in Europe: An Analysis of the European Blind
Union CRPD Database**

Article 33: National Implementation and Monitoring

Sarah Woodin

For the European Blind Union

September 2019

Table of Contents

Purpose and Background of the Report	2
Article 33 of the CRPD	3
Administrative Arrangements	4
Links to other United Nations Human Rights Treaties	5
Other CRPD Articles	5
General Comment 7	6
Concluding Observations of the CRPD Committee	7
Analysis of National Implementation and Monitoring in the EBU Database	9
Section 1 Designation and Organisation of National Bodies.....	10
Section 2 Availability of DPOs / OPDs	11
Section 3: Involvement and Participation of Organisations of DPOs / OPDs in monitoring of the CRPD	13
Conclusions	20

Purpose and Background of the Report

The EBU database aims to provide information at country level on progress made towards implementation of Articles of the Convention on the Rights of Persons with Disabilities (CRPD), in order to support EBU's membership, campaigners and policy makers.

In this report, we describe progress on Article 33: National Implementation and Monitoring. The CRPD requires specific structural arrangements to be in place for implementing and monitoring the Convention and it is a cross – cutting requirement that disabled people are 'involved and participate fully' in it, in line with the central tenet of the disabled people's movement: 'nothing about us without us'.

This is the second report by EBU on Article 33. The first, written by Philippe Chazal in 2015¹, covered both Articles 33 and 35². The current report draws on that previous work³ and aims to provide an update in line with the development of new guidance from the Committee on the Rights of Persons with Disabilities, which is discussed below. Overall, this report has a dual purpose: to report on the experiences of EBU members and to inform the EBU membership. Therefore, information about the CRPD requirements for implementation bodies is included in the section on Administrative Arrangements by way of explanation for readers new to the subject. Following this, links to other treaties, articles and policy are made, before a discussion of the results of the survey.

Article 33 of the CRPD

The Text of Article 33 is as follows:

1. States Parties, in accordance with their system of organization, shall designate one or more focal points within government for matters relating to the implementation of the present Convention, and shall give due consideration to the establishment or designation of a coordination mechanism within government to facilitate related action in different sectors and at different levels.
2. States Parties shall, in accordance with their legal and administrative systems, maintain, strengthen, designate or establish within the State Party, a framework, including one or more independent mechanisms, as appropriate, to promote, protect and monitor implementation of the present Convention. When designating or establishing such a mechanism, States Parties shall take into account the principles relating to the status and functioning of national institutions for protection and promotion of human rights.
3. Civil society, in particular persons with disabilities and their representative organizations, shall be involved and participate fully in the monitoring process.

¹ Chazal, P. (2015) Capacity Building Training Seminar: How to monitor the implementation of the UNCRPD through articles 33/35, EBU.

² Article 35 is concerned with written reports by States Parties and includes a reference to the importance of including contributions by disabled people.

³ Many thanks are also due to Philippe Chazal for his constructive comments on this updated report.

Administrative Arrangements

It follows from the text above that the CRPD requires State Parties to set up one or more focal points to develop national work on the Convention. The focal point should be part of government, have the resources needed to carry out the work and be sufficiently accessible to persons with disabilities. States may designate several focal points or sub-focal points and a number of countries have done this. However, the Convention does not give detailed guidelines on how this should be done – it is a matter for the country concerned.

Where countries do have several focal points, (often for reasons of geography or to represent different levels of government), Article 33(2) asks States Parties to consider setting up a co-ordination mechanism, although this is advisory and not a formal requirement. A co-ordination mechanism can also help to ensure that action takes place across all government ministries (so it is not an isolated initiative of just one department, for example).

The third organisational requirement is the independent mechanism and this is not optional. Independent mechanisms should ‘promote, protect and monitor’ the implementation of the Convention. States may decide to designate existing organisations or establish new ones and they may designate one or several human rights organisations.

The independent mechanism should be properly constituted, that is, operate according to the Paris Principles.⁴ The Paris Principles require that the human rights organisation is created by law, is free from government interference, (government representatives may only advise), is able to choose its own staff, set its own priorities and is properly financed. National Human Rights Institutions (NHRIs) are granted A-, B- or C- Status by the International Coordinating Committee of NHRIs, based on whether they adhere to the Paris Principles. It is worth noting that not all independent mechanisms of the countries covered by this report had accredited status at the time of writing this report.

The CRPD states that the independent mechanism should be closely linked to civil society and this includes organisations of disabled people.

In practice, there are very different arrangements in the various countries. As well as the information in the EBU country database, the

⁴ Paris Principles <https://nhri.ohchr.org/EN/AboutUs/Pages/ParisPrinciples.aspx>

EU's DOTCOM database⁵ provided by the Academic Network of European Disability Experts (ANED) additionally provides useful details about which organisations are designated as focal points, coordination mechanisms and independent mechanisms. It includes links to further relevant information.

The answers given by EBU members in this report give an indication of the extent to which people with visual impairments are effectively involved.

Links to other United Nations Human Rights Treaties

The principle of equal access to participation in the in government and public affairs of countries by all people is set out in Article 21 of the Universal Declaration of Human Rights⁶. Article 25 of the International Covenant on Civil and Political Rights⁷ confirms and further establishes this.

Other Treaties also recognise participation as a right, including Article 5 (c) of the International Convention on the Elimination of All Forms of Racial Discrimination⁸, Article 7 of the Convention on the Elimination of All Forms of Discrimination against Women⁹, and articles 12 and 23 (1) of the Convention on the Rights of the Child¹⁰.

Other CRPD Articles

While Article 33.3 is explicit about the participation of disabled people in monitoring implementation of the CRPD, there is a broader requirement for ensuring participation in the CRPD. Article 4: General obligations, section 3 states:

⁵ DOTCOM database: <https://www.disability-europe.net/dotcom>

⁶ Universal Declaration of Human Rights <https://www.un.org/en/universal-declaration-human-rights/>

⁷ International Covenant on Civil and Political Rights
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx>

⁸ International Convention on the Elimination of All Forms of Racial Discrimination
<https://www.ohchr.org/en/professionalinterest/pages/cerd.aspx>

⁹ Convention on the Elimination of All Forms of Discrimination against Women
<https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>

¹⁰ Convention on the Rights of the Child
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations.

Article 4 therefore takes a wider view compared with Article 33(3), requiring participation in developing and implementing the CRPD as a whole rather than only monitoring of the Convention. Article 33 should be read in this broader context.

Article 33 also has specific links to several other articles, in particular Article 29: Participation in political and public life, Article 9: Accessibility and Article 35: Reports by States Parties.

General Comment 7

Due to some concerns with how States Parties have implemented Article 33 and Article 4(3), in 2018 the Committee on the Rights of Persons with Disabilities published General Comment 7 on the participation of persons with disabilities.¹¹ The aim of General Comment 7 is to provide greater clarity on the issues involved,¹² in order to improve practice.

The document points out an important gap between the ‘spirit’ of Articles 4(3) and 33(3) of the CRPD and actual practice. The first problem identified is insufficient consultation with disabled people through representative organisations. Second, not enough attention is paid by States Parties to the contribution and expertise of disabled people, who they point out, have first-hand knowledge about whether rights are being implemented. The Committee also emphasises that representative organisations should be led, directed and governed by disabled people themselves, rather than by non-disabled people, and it sets out in some detail how this is to be recognised.

¹¹ General comment No. 7 (2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention
https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CRPD/C/GC/7&Lang=en

¹² See OHCHR <https://www.ohchr.org/en/hrbodies/pages/tbgeneralcomments.aspx> and European Network on Independent Living: <https://enil.eu/news/the-purpose-and-use-of-un-treaty-body-general-comments/>

Specifically regarding Article 33, the Committee emphasises that involvement in the focal point, co-ordination mechanism and independent mechanism is necessary. To put this into effect, the Committee states that there is a need for capacity building, adequate funding, reasonable accommodation and accessibility measures to make sure disabled people can be effective. States Parties must take active responsibility for this and they should evaluate their efforts, making sure that other parties do not interfere with the participation of disabled people and their organisations.

Therefore, General Comment 7 sets out some clear guidelines and requirements and these are particularly relevant for this report.

Concluding Observations of the CRPD Committee

As background research for this report, the Concluding Observations of the Committee on the Rights of Persons with Disabilities between 2015 and 2019 were reviewed for EBU member countries. There were 16 reviews between these dates and all of the Concluding Observations made recommendations on Article 33. These are briefly analysed here by way of a preamble to the following discussion on findings from the EBU database. The countries reported on in this and the following section overlap but they are not the same.

In 2018 the CRPD Committee reviewed: Spain (ES), Poland (PL), Macedonia (ME), Bulgaria (BG), Slovenia (SI), Luxembourg (LU). In 2017: United Kingdom (UK): Montenegro (ME), Cyprus (CY), Bosnia Herzegovina (BA), Italy (IT), Serbia (RS). In 2016: Portugal (PT), Slovakia (SI), Lithuania (LT). In 2015: Czech Republic (CZ). Concluding Observations for 2019 were not yet available at the time of compiling this report.

Shortcomings in the basic structural arrangements as a whole were noted for some countries, even before involvement of disabled people and people with visual impairments was assessed. In Luxembourg, the Committee identified lack of clarity on roles and the scope of authority of the bodies problematic, as well as the fact that discrimination in the private sector was not covered. The UK was criticised for not ensuring independence and funding for monitoring bodies as well as not following CRPD guidelines on monitoring. In the Czech Republic the Concluding

Observations from the review were not made available to civil society, including disabled people.

Further points were made regarding specific official bodies. For focal points, problems included a paternalistic attitude (PL), lack of technical capacity in enforcing requirements (PL, SI, SK) and indeed the absence of a focal point at all (BA, ME). Lack of coordination was evident, where not enough focal points were present at the various levels of government or across ministries (LT, PL, SI, SK, UK). Capacity problems also included lack of enough funding to be effective (CY, PL, UK).

Even more problems were identified in relation to the independent mechanisms. In some countries none existed (BG, ME, IT) while in others the independent mechanisms did not adhere to Paris Principles¹³ (BA, LT, LU, PT, RS, SI). Specific problems of under-resourcing and lack of funding were common to many countries (ES, ME, PL, PT, UK).

Many observations noted that disabled people had a marginal role in monitoring the Convention. This was most acute for some groups that were frequently left out and who were often not reported on, particularly women, minority ethnic groups and children. In many cases, there was not enough meaningful involvement (BG, LU, PL, RS, SI). In Spain, while there was involvement in monitoring, the Committee identified the need for this to be strengthened. The most common problem identified however, was lack of sufficient funding (BG, ES, IT, ME, PL, RS, SI).

Clearly then, according to the Committee, there are substantial limitations in the extent to which people with visual impairments and disabled people are sufficiently involved in monitoring implementation of the Convention. In the light of this, it is perhaps not surprising that EBU received a smaller number of replies to the survey than might have been expected. Nevertheless, the answers received provide an important insight into the experiences of EBU members and these are discussed next.

¹³ Paris Principles <https://nhri.ohchr.org/EN/AboutUs/Pages/ParisPrinciples.aspx>

Analysis of National Implementation and Monitoring in the EBU Database

Introduction

In 2018, EBU members received a questionnaire on Article 33 and some guidance for completing it. This section discusses the results from the survey, which have also been supplemented where possible through additional research by the author of this report.

Questions in the survey were based on various aspects of Article 33, including on the functioning of the focal point, co-ordination and independent mechanisms. Although information about the formal arrangements is readily available in official documents, we also wanted to ask about how much knowledge organisations had about how they worked.

As noted above, this is the second report produced by EBU on Article 33. The first report, written by Philippe Chazal in 2015, was based on responses received from 16 countries. For this second survey we received nine replies. Although some countries replied to both surveys (Croatia, Germany, Spain, Slovakia), most were different and one country, Malta, which replied to the first survey, is no longer a member of EBU. In order to not lose the earlier data, we have updated the country information where possible, using supplementary sources and noting the difference between earlier and later information. Both sets of replies have been incorporated into the report. It should be noted that because the earlier and later questionnaires were different, there are some inconsistencies in reporting and in the national replies. The final 19 countries included in this report are as follows:

Austria (AT), Belgium (BE), Bulgaria (BG) Croatia (HR), Czech Republic (CZ), Denmark (DK), France (FR), Germany (DE), Hungary (HU), Italy (IT), Montenegro (ME), Netherlands (NL), Poland (PL), Serbia (RS), Slovakia (SK), Slovenia (SI), Spain (ES), Switzerland (CH), United Kingdom (UK).

Answers to the questionnaire are discussed below and readers should refer to individual country reports for more detailed information it is needed.

Section 1 Designation and Organisation of National Bodies

Section 1 is mainly concerned with whether monitoring bodies were in place, while their actual functioning was covered later on in the survey.

Question 1 asks:

Does your country have one or more focal points for implementing the CRPD? Please say which organisation(s) and give web links if available.

All countries answered yes to this question, except Serbia and Montenegro. Some countries reported that focal points had been appointed at different levels of government (BE, DE, UK). Further details of the specific focal points are given in the country reports but typically they were located in a relevant government ministry.

Question 2 asks:

Does your country have a co-ordination mechanism? If so, please say which organisation and give a web link if available.

Again, all countries answered yes to this Question except for three (CZ, ME, RS) who indicated that there was none. In most countries the co-ordination mechanism was the same as the focal point or another part of the same organisation.

Question 3 asks:

Does your country have an independent mechanism to promote, protect and monitor implementation of the CRPD? If so, please say which organisation(s) and give web links if so.

Again, most countries confirmed the existence of an independent mechanism, with the exception of three countries (Czech Republic, Montenegro and Serbia).

Question 4 asks:

Please comment on the status of the independent mechanism. Is the organisation(s) concerned with protecting and promoting human rights and does it operate in an effective way?

It was not always easy for respondents to answer this question, for a number of reasons. In part this may be due to insufficient information about the activities of organisations but is also due to the fact that there may be a number of factors involved and situations are complex.

Organisations might work effectively in some areas and not in others. Very broadly, however, the answers may be summarised as follows.

Answers	Yes, effective	Somewhat effective	Not effective, not applicable	Not known
Countries	DE, DK, HR, NL, SK	AT, BE, PL, SI, UK	BE, BG, CH, HU, IT, ME, RS	FR, PL

Problems included insufficient adherence to the Paris Principles¹⁴ (AT, CH, HU, SI) and insufficient energy put into promotion of the Convention (BE). In some instances improvements were planned but had not yet been put into effect.

Section 2 Availability of DPOs / OPDs

The second part of the survey asked about whether there are organisations of disabled people that could take part in monitoring of the Convention.

Question 5 asks:

Are there established organisations of people with visual impairments / disabled people who can monitor implementation of the CRPD in your country? Please describe the organisation(s) and give a web link(s) if available. Is there an umbrella group that co-ordinates the work of organisations?

Established organisations of people with visual impairments and disabled people were present in all countries and umbrella groups were also reported. In the Czech Republic, the organisation of blind and partially sighted people did not have representation in the umbrella group and in Denmark the EBU organisation did not participate in monitoring the Convention, which was done by the national umbrella group. The information was missing for Bulgaria and Italy.

Question 6 asks:

Are these organisations led, governed and directed by people with visual impairments / disabled people and are they the majority of members? (If not, please explain who the members are).

¹⁴ OHCHR *Paris Principles*
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/StatusOfNationalInstitutions.aspx>

In General Comment 7 the CRPD Committee emphasises that disabled people should exercise control over organisations that seek to represent them in order to ensure that their voices are heard. This means there should be a ‘clear majority’ of disabled people in the organisation who direct, lead and govern the organisation.¹⁵

This question did not feature in the 2015 questionnaire but was included in 2018. Due to lack of sufficient information, there are a number of countries included in the ‘Not Known’ category in the table below. The answers given are as follows:

Answer	Yes	No	Not known
Countries	AT, BE, CZ, DE, DK, ES, HR, PL, RS, SI	BE, ME	BG, CH, FR, HU, IT, NL, SK, UK

Belgium appears in both the ‘yes’ and ‘no’ group because while the member organisation is not governed by people with visual impairments, the umbrella group is so governed. Denmark reports that some member organisations are run by parents, relatives and carers of people with visual impairments and they have been included in the ‘yes’ category as this is defined in General comment 7. Insufficient information was available for many of the countries included in the ‘not known’ category.

Question 7 asks:

Do these organisations have the experience and capacity to advocate for the interests of people with visual impairments / disabled people? Are there any limitations on their ability to do this?

Many countries mentioned financial resources as the main problem in relation to capacity (BG, CZ, ME, PL, SI) and that issue is reported on further in question 24 below. Lack of opportunities to take part was mentioned as problematic by Serbia, while the Netherlands doubted the willingness of government to implement the CRPD. Montenegro noted the poor transparency of state institutions.

A summary of answers given is in the table below.

¹⁵ For further details see: General Comment 7 https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CRPD/C/GC/7&Lang=en

Answer	Sufficient capacity	Insufficient or partial capacity	Not known
Countries	AT, DE, DK, ES, HR, UK	HR, ME, PL, SI, SK	BE, BG, CH, FR, HU, IT, NL, RS

Croatia appears in two categories because the author reports that while there is organisational capacity at national level, it is insufficient at local level. Some answers indicate that insufficient opportunities for involvement is the main problem, making capacity more difficult to judge (HU, NL) while in other instances demands to provide immediate assistance and services tend to take priority over participation in monitoring (CZ, PL). Women, ethnic minority groups and children were reported as having fewer opportunities than most (ES).

Section 3: Involvement and Participation of Organisations of DPOs / OPDs in monitoring of the CRPD

Question 8 asks:

Do official bodies involve disabled people and people with visual impairments specifically, in the monitoring of implementation of the CRPD?

- Focal point(s)?

Answers given were as follows:

Answer	Yes	Partial or unsatisfactory	No	Not known
Countries	DE, ES	BE, CH, FR, HR, IT, RS, SI, SK, UK	DK, ME	AT, BG, CZ, HU, NL, PL

Just two countries said arrangements were working well. In Spain, for example, it was felt there was effective scrutiny because the government had been investigated by the CRPD Committee following complaints about inclusive education. More frequently, arrangements were felt to be inadequate or partial. Croatia pointed out that although a committee existed that reported to the government, recommendations were effectively ignored. In Italy and Slovenia, information about the functioning of the focal point was lacking, limiting the potential for input. In the UK, substantial weakening of the focal point through reduced

scope of operation, funding and staff had led to a reduction in effectiveness. Complexity of governing arrangements made effective participation problematic in Belgium. Finally, France stated that ultimately it was left to associations of people with disabilities themselves to try to promote the CRPD among their members by organising conferences, distributing brochures or articles, and through regular contacts with other organisations.

- Co-ordination mechanism?

Answer	Yes	Partial or unsatisfactory	No	Not known
Countries	DE, ES, PL	BE, CH, HR, IT, SI, SK, UK	CZ, DK, ME, NL, RS	AT, BG, FR, HU

In most countries, the focal point is also the co-ordination mechanism and therefore there is overlap between the answers given here and those in the previous question. However, some reported co-ordination problems (CH, UK). In Switzerland there was reported to be little co-ordination effort between cantons, while in the UK, despite a stated intent to increase involvement of disabled people, little was evident in terms of engagement or a concrete plan of action.

- Independent mechanism?

Answer	Yes	Partial or unsatisfactory	No	Not known
Countries	AT, DE, ES, NL	BE, FR, HR, SI, UK	BG, CH, DK, FR, IT, ME, RS, SK	HU, PL

Again, here there are more countries reporting a lack of satisfactory participation than positive involvement. In some instances the independent mechanism is not properly constituted or under - resourced (see Question 3 above) but in others it is simply that proper involvement and participation is not in evidence. For example, in Slovenia, it is reported that despite occasional invitations to participate when new legislation is proposed, through participation in working groups, participation is sporadic and there is a lack of information about how the organisation functions.

The kind of marginal participation that is frequently reported strongly suggests tokenistic rather than meaningful involvement.

Question 9 asks:

Please give examples of how organisations of people with visual impairments have been involved effectively (if any)?

Six examples were given, as follows:

Austria: The presence of a visually impaired representative on the Federal Monitoring Committee;

Germany: Involvement with the focal point in development of national actions plans;

Denmark: An opportunity to comment on the government country report (although they did not do so and instead contributed to the alternative report);

Italy: DPOs / OPDs are represented in the national observatory of people with disabilities;

Poland: Participation in teams and expert groups at central and regional levels.

Croatia: Effective cooperation with the Ombudswoman, as the independent mechanism (but see also comments on lack of resources in Question 10 below).

Question 10 asks:

Please give examples of where organisations of people with visual impairments *have not been* effectively involved, (if any)?

As mentioned above, problems included omission of people with visual impairments and disabled people from consultations and decision making (BG, IT, ME, PL). Other issues mentioned were as follows:

Belgium: Not disseminating information and / or not doing so in accessible formats or accessible means, such as through web sites;

Croatia: Designating DPOs / OPDs as an independent mechanism but providing no resources to enable work to be carried out;

France: Insufficient resources allocated;

Germany: lack of disability mainstreaming, resulting in lack of impact assessment of new legislation and policies.

Hungary: continuing discrimination against Roma people with visual impairments;

UK: Lack of implementation of recommendations of the CRPD committee.

Question 11 asks:

Are visually impaired people from under-represented groups purposefully included (e.g. children, women, people from minority ethnic groups, in relation to legal and other status etc.)?

Answers may be summarised as follows:

Answer	Yes	No	Not known or not answered
Countries	DE, DK, ES, RS	AT, BE, BG, CH, HR, HU, NL, RS, SI, SK, UK	CZ, FR, IT, ME, PL

Many countries note that only rarely is account taken of the diversity of people with visual impairments.

Germany answered yes to this question on the basis that women and refugees were specifically targeted in the national action plan and initiatives of the Federal Commissioner, with projects developed with these groups in mind. However, they point out that this is ad hoc rather than systemic and systematic. Serbia noted that there was some recognition of gender but there was no consultation with women and girls. In Denmark, the Danish Institute on Human Rights involved the organisation of people with visual impairments and sometimes took account of minority group interests.

Several countries also pointed out that this lack of recognition was reflected in a lack of data also (CH,HR, HU).

Question 12 asks:

Do official bodies provide guidance for other organisations and examples of good practice in the participation of people with visual impairments / disabled people? Please give examples.

Answers may be summarised as follows:

Answer	Yes	No	Not known
Countries	DK, HR, ES	AT, DE, CH, DE, ME, PL, RS, SI, SK, UK	BE, BG, CZ, FR, IT, NL

There was very little evidence that governments gave guidance or support to organisations on how they should involve people with visual impairments and disabled people. There were no examples of concrete ways that governments had supported this.

In Croatia this support was offered by the Ombudswoman as part of the independent mechanism and in Denmark, involvement was also possible although there is no mention of specific initiatives. In Spain the organisation of people with visual impairments provided this support themselves to Latin American and Portuguese organisations of disabled people.

Question 13 asks:

Is attention paid to accessibility and appropriate support to enable people with visual impairments / disabled people to participate in monitoring of the CRPD?

This is clearly a very broad question. However, a summary of judgements by countries is below:

Answer	Yes	Partly	No	Not known /not answered
Country	DE, DK, ES, PL	AT, IT, SI, SK, UK	BE, CH, HR	BG, CZ, DK, FR, HU, IT, ME, NL, RS

Some countries described the situation further. Denmark noted that the text of the Convention was accessible but did not refer to other publications. Similarly, Austria stated that work of the federal monitoring committee was accessible. In Germany, minutes of meetings and other information was accessible to people with visual impairments and although some limitations remain, these are due to be rectified through law.

In the UK, reductions in support in recent years were noted.

Question 14 asks:

Is sufficient funding available to ensure that people with visual impairments / disabled people can take part in monitoring of the CRPD?

A summary of answers is below:

Answer	Yes	Partly	No	Not known/ not answered
Countries	ES	AT, PL	BE, BG, CH, CZ, DE, HR, IT, ME, RS, SI, SK	DK, FR, HU, NL, UK

In Spain, the organisation of people with visual impairments organises the funding necessary for taking part in monitoring. However, this does not appear to be the case in other countries. In Austria, funding is available to take part in the federal monitoring committee but not for the separate work of organisations of people with visual impairments. In Poland, funding was available in some situations but not others and was said to be insufficient.

Insufficient funds limited what organisations were able to do (DE, SK). In some countries it was only available through applying for funding for projects (ME), rather than for ongoing work.

Question 15 asked:

Is there support for capacity building of organisations? Is this sufficient?

Capacity building is a process by which individuals and organisations are able to obtain, develop, and retain skills, knowledge and other resources needed to do work effectively on a task. While clearly funding is an important part of capacity building, this question was about other aspects, such as support for developing awareness, knowledge and ability to operate in a complex policy field. Answers given were as follows:

Answer	Yes	Partly	No	Not known / not answered
Countries		DE, DK, ES, HR, ME, RS, SK	AT, BG, CH, CZ, SI, UK	BE, FR, HU, IT, NL

It is striking that there is very little support for capacity building in any EU countries taking part in this survey. Even where there was partial support, one comment made was that 'any capacity building, awareness raising etc. is not supported publicly but some activities run by (another organisation) may have such effects, intended or not'. (DK) No positive examples of capacity building were given by any country. This is clearly a very disappointing situation.

Question 16 asked:

How could participation in monitoring and development of the CRPD by organisations of people with visual impairments / disabled people be made more effective in your country?

This is another very broad question and the answers were varied. Improvements to participation were the priority of many countries, whether in politics (AT), representation on bodies concerned with implementing the CRPD (HR, ME, PL, RS, SI, SK), or opportunities to comment on developments (CZ, DK). In turn, participation required the development of concrete action plans and measures to implement the CRPD, which were lacking in some countries (DE, DK, PL, UK). Other countries picked up on problems of capacity building and training (SI) while funding shortfalls were also noted (HR, PL, SI). While participation of under – represented groups was clearly an issue for all countries, it was mentioned specifically just once (ES).

Question 17 asked:

Do you have additional comments on the implementation of Article 33 in your country? In particular, please reflect on any changes and developments since 2014.

This question was only answered directly by countries participating in the latest 2018 survey and not all gave comments. A summary of those who did is below.

Denmark: Omission of requirements for reasonable accommodation and accessibility from legislation on disability discrimination is problematic.

Serbia: "Regrettably, no positive developments are visible since 2014 and it is evident that provisions of the UNCRPD are not respected."

Germany: The lack of disability mainstreaming is considered a major obstacle to progress.

Poland: Information and education campaigns are needed to encourage people with disabilities to become more involved. These should show that change is possible.

Spain: Now there is a level of awareness of the CRPD, it is time to engage with other treaties such as the CEDAW and CRC.

Conclusions

EBU's earlier report¹⁶ noted limitations in the priority given to the CRPD by governments and the role of people with visual impairments in monitoring implementation. From the results of this survey it is apparent that these limitations remain and there is still a considerable distance to go. This lack of commitment is also apparent in the dearth of resources available to organisations of disabled people, including help to understand the systems and structures and the time and financial backing to take part.

EBU is aware that many organisations of people with visual impairments have to struggle to manage day to day commitments and do not have the spare capacity to undertake additional work, especially if it is complex and not easily accessible. Therefore, there is a need for a proactive approach to developing capacity, through communication of knowledge, accessibility and support measures, adequate funding to carry out work and opportunities to develop further expertise through time. It is clear that this remains a vital issue at present.

If there is one recommendation that may be made from the answers to this survey, it is that very much more needs to be done to enable effective monitoring by people with visual impairments on an equal basis with others. Making this a reality requires effort on multiple fronts.

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¹⁶ Chazal, P. (2015) Capacity Building Training Seminar: How to monitor the implementation of the UNCRPD through articles 33/35, EBU