



Co-funded by  
the European Union



The voice of blind and partially sighted people in Europe

## **Loss of disability benefits due to entering paid work: spotting the disability benefits trap in EU countries**

EBU background note for European Semester process

December 2025

### **Table of content**

1. Introduction – p. 2
2. Material scope – p. 3
3. Preliminary remarks – p. 3
  - a. Two types of disability benefits, alternative or complementary 3
  - b. Work-income adjustment and means-testing – p. 4
  - c. Reasonable expectations – p. 5
4. Criteria for identifying bad practices – p. 5
  - a. “One or the other” – Disability benefits are incompatible in practice with any significant earnings from work – p. 6
  - b. “What for?” – There is no financial incentive of working, considering the potential loss of disability benefits – p. 7
  - c. “No secured part” – There is no secured part of benefits to address the extra costs of living with a disability or assistance – p. 8
  - d. “No fallback” – Professional earnings or working time may lead to loss of contributory benefits without fallback on non-contributory benefits, because these are strictly alternative – p. 9
  - e. “The household” – The means-testing for non-contributory benefits looks at the household, not the individual beneficiary – p. 10
  - f. “No trial period” – There is no trial work period during which re-entry into previous entitlement to benefits is guaranteed – p. 10
5. Overall assessment of country performance – p. 11
6. Conclusion/Demands – p. 14

About EBU – p. 15

Annex – Methodology, documentation biases, sources of information – p. 16

## 1. Introduction

The European Blind Union (EBU) decided to engage in this initiative after reading the European Social Protection Network study for the European Commission titled “Social Protection for Persons with Disabilities in Europe - An analysis of policies in 35 countries”, published in 2022. In that study, the following recommendations to countries retained our attention:

- Factor in the additional costs of disability and addressing inequality between those on the same income with and without a disability (“horizontal inequality”), i.e., review the approach to ensuring that the additional costs of living associated with disability do not fall on people with disabilities and their families.
- Implement social protection schemes covering such additional costs through needs-based mechanisms which are not means-tested and not based on prior contributions to social insurance schemes.
- Promote enabling conditions for the labour market integration of people with disabilities, which requires reflecting on the best ways to address existing “disability traps” and to avoid creating any more traps of this kind.

Further, we noted the European Union-level recommendation to promote mutual learning activities and exchanges of good practices among the Member States, with a view to identifying and assessing social protection schemes and policies which tackle horizontal inequality by taking into account the additional costs of disability and emphasising non-means-tested entitlements.

This prompted us to look further, through a comparative approach between EU countries, into the so-called “disability benefits trap” matter, i.e., the inefficient situation whereby people with disabilities (PWDs) are financially disincentivised from working or to work up to their full capacity.

This is not a rhetorical question: an OECD report of 2022 says that “Data from all countries show that a significant share of people on partial benefits do not work and simply rely on a payment that is lower than a full benefit.”

Moreover, in respect of PWDs that do enter work, Eurostat figures show that, while being in employment generally reduces the risk of poverty, employment as such does not make poverty disappear and that the in-

work at-risk-of-poverty rate is substantially higher for PWDs. Loss of disability benefits is likely part of the explanation.

The aim is to inform the European Commission so that the issue is raised in the Joint Employment Report for the European Semester process and, hopefully, eventually is raised through country-specific recommendations.

## 2. Material scope

In analysing how eligibility for and amounts of disability benefits are affected by engaging in paid work, we only look at **disability benefits in cash** (i.e., payments) for working-age people with disabilities, excluding benefits in kind. We also focus on the **mainstream job market**, excluding disability benefits in rehabilitation, because they are temporary and transitional, employment-oriented by design, and we don't enter into special considerations about sheltered employment. We further exclude benefits in the form of an allowance on the taxation of the revenue.

Also, we only consider **work-related earnings strictly speaking**, excluding other social security benefits closely related to work, such as unemployment benefits and invalidity or old-age pensions. We are aware that the ability to combine disability benefits with these can differ from combining them with income from employment, but we have not looked into that.

**Note:** a country may perform well as far as compatibility of disability benefits with paid work is concerned, but offer only very low benefits, and the reverse may also be true. The generosity of disability benefits is something that this note does not look into.

Moreover, while we don't look into "job retention", i.e., the ability for individuals with progressive vision loss to maintain employment, rather than merely enter, it should also be valued in assessments of benefit compatibility and employment policy.

## 3. Preliminary remarks

### a. Two types of disability benefits, alternative or complementary

Within disability benefits in cash, two main types need to be distinguished:

- Disability benefits under social insurance schemes (hereafter "contributory benefits") which depend on the person's past

insurance contributions, i.e., people have to contribute a minimum amount in order to receive support.

- Disability benefits which are social assistance (“hereafter non-contributory benefits”) which are available, regardless of insurance contributions.

Most EU countries have both types of benefits, with the remarkable exception of Denmark which only has a non-contributory disability benefits system. Germany and Slovakia may appear as having only a contributory disability benefits scheme, but in fact that is only predominantly the case. Conversely, Czechia essentially has a non-contributory system: the disability pension is received without condition of contribution by people who are born visually impaired, and besides, the contributions requirements, where applicable, are relatively low.

Contributory benefits essentially aim to compensate for a loss of professional capacity and revenue.

Depending on countries, there can be either one or both of the following two approaches to non-contributory benefits:

- The alternative approach: non-contributory benefits come as a safety net for those who cannot rely on contributory disability benefits because they have not contributed or not contributed enough within the social insurance system.
- The complementary approach: non-contributory benefits aim to top-up income or cover extra disability-related costs.

Most EU countries combine both approaches, depending on type of benefit or disability, age and professional situation. However, some countries can be identified as following mostly the alternative approach (Greece, Ireland, Luxembourg, Netherlands, Portugal, Slovenia, Spain, Sweden); others, mostly the complementary approach (Bulgaria, Germany, Estonia, Finland, Croatia, Czechia, Hungary, Italy, Latvia, Lithuania, Poland, Slovakia).

### **b. Work-income adjustment and means-testing**

Most EU countries use work-income adjustment for contributory benefits, i.e., the benefits are reduced or suspended depending on earnings from work. They do so by operating earnings thresholds (above which benefits are suspended or replaced) or gradual phase-outs (benefits reduced as earnings rise).

Non-contributory disability benefits in cash are means-tested in most EU countries, based on the beneficiary's overall income and assets.

### **c. Reasonable expectations**

Work is a major factor of social inclusion for PWDs. While it is legitimate to reduce or even suspend contributory disability benefits to match a remaining work- or earning-ability attested by engaging into paid work, and possibly to revise the level of disability, we argue that there should always be a financial interest to engage in paid work for PWDs. Otherwise, this would send the wrong signal that society prefers to see PWDs remain out of work and dependent.

States are of course free to determine how generous they can or want to be with disability benefits, especially non-contributory, but they should not neglect the fact that these benefits should, whatever the approach, aim at least in part to compensate for the extra costs of living with a disability. Otherwise, they would fail to address the 'horizontal discrimination' that PWDs face in the cost of living.

We refer to:

- Articles 4, 27, and 28 of the UN Convention on the Rights of Persons with Disabilities, and the CRPD Committee's General Comment No. 8 (2022) on Article 27 which further clarifies that States should ensure that the transition to employment does not result in the loss of essential support, and that social protection systems should be designed to support, rather than penalise, employment, and
- Principles 12 ("Regardless of the type and duration of their employment relationship, workers, and, under comparable conditions, the self-employed, have the right to adequate social protection") and 17 ("People with disabilities have the right to income support that ensures living in dignity (...)" of the European Pillar of Social Rights

## **4. Criteria for identifying bad practices**

With the above considerations in mind, a combination of the following criteria may be used to assess whether and to what extent a country, in its disability benefits policy, is financially discouraging PWDs to engage in paid work. These criteria partly overlap.

**a. “One or the other” – Disability benefits are incompatible in practice with any significant earnings from work**

The practical effect of work-income adjustment and means-testing can feel like “you can’t work and keep the benefits,” but there is no literal incompatibility. The issue, rather, is the extent to which disability benefits can be cumulated with professional earnings. Let’s distinguish contributory and non-contributory benefits in this respect:

**Contributory benefits** aim to compensate the lost revenue of work caused by a disability, so it is not abnormal to reduce and possibly even fully stop them in light of a revised earning capability/residual work capacity. Indeed, several countries operate “absolute” or “total incapacity” contributory benefits that are, by definition, for people who cannot work at all — those benefits are therefore logically incompatible with paid employment. When a country “prohibits” combining work and a particular cash benefit it is usually only for a specific benefit — the person may instead be eligible for a different (often reduced) partial incapacity benefit while working, through re-assessment of the level of incapacity – Spain is a good example of this.

However, in some countries the receipt of a contributory disability pension is suspended in full as soon as the beneficiary resumes professional activity, even partially, if their income exceeds a very low threshold, even if this activity is compatible with their degree of incapacity or residual capacity; so much so that one may argue that it is similar to incompatibility between work and disability benefits. The logic seems to be that the disability pension is designed to compensate for the inability to work. These countries include Austria, Luxembourg, Portugal, as well as Germany and Greece (with the exception of protected activities).

The situation is radical in Greece: the disability pension is suspended if the beneficiary resumes employment, regardless of income level or working hours. In the other five countries mentioned, the suspension results from exceeding either a very low earnings threshold or a very low working time threshold (between 8 and 20 hours per week).

Conversely, in Bulgaria, Croatia, Czechia, Hungary, and Slovakia, even recipients of the most severe degree of disability pensions are allowed to engage in paid work without any impact on their pension, as long as they meet the disability criteria. If someone is able to work despite their

disability, they are not penalised. This encourages the integration of individuals with disabilities into the workforce by allowing them to supplement their income through employment while still receiving their disability pensions. The reasoning is that the benefit compensates for lost earning capacity, not for lack of income. Spain follows the same logic, but with gradually stricter conditions as the degree of disability increases – e.g., only minor, non-registered work is allowed in the case of Absolute Permanent Disability or Major Disability. In Italy, PWDs can combine work-related income and contributory benefits but the latter are gradually reduced up to 50% according to work-related income thresholds.

**Non-contributory benefits**, as already said, are most often subject to means-testing, which is not abnormal in itself. However, in some countries, they are reduced or suspended as soon as the beneficiary has an income, even a modest one. For instance, in Bulgaria, Luxembourg and Romania, the threshold of earnings from work is close to zero; and in Ireland, Italy and Spain, it is very low.

Luxembourg stands out as having a restrictive policy both for contributory and non-contributory benefits.

Conversely, Denmark, Estonia, Finland, Lithuania, and Sweden don't use means-testing. Eligibility is based on the degree of disability and work capacity. The Netherlands generally does not apply means-testing to non-contributory disability benefits, but certain schemes — particularly Wajong, which is specifically designed for people who became permanently disabled or chronically ill before the age of 30 — are income-dependent when the beneficiary enters work.

**b. “What for?” – There is no financial incentive of working, considering the potential loss of disability benefits**

Most EU countries that use work-income adjustment or means-testing financially disincentivise work to a lesser or greater degree, especially for non-contributory benefits the purpose of which is minimum income protection.

Besides the situations described through the other criteria in this section and the obvious cases of near-incompatibility (Luxembourg) or very low hard thresholds (Bulgaria)—not to mention taxation of revenue, social security contributions, means-tested supplements (housing, minimum income) which this note does not consider, but the interaction between

these and loss of disability benefits in cash should not be underestimated—the absence of financial incentive of working may also result from one (or the combination of) the following situations:

- Immediate reduction from first level of earnings, without significant earnings disregard.
- Gradual reduction, strictly proportional or more than proportional to the extra earnings from work.
- Sharp reduction above thresholds resulting in a “cash-cliff” effect.

For contributory benefits, Austria, Belgium, Denmark, and France show all three patterns 1, 2 and 3, as well as Italy more moderately, while Finland and (for partial incapacity) the Netherlands show patterns 2 and 3, and Slovenia shows patterns 1 and 3.

For non-contributory benefits, the following countries notably show all three patterns: France, Hungary, Ireland, and Spain. Also Germany (only for top-up benefits) and the Netherlands, although the means-testing there is more limited in material scope. Greece shows pattern 1 and 3. Belgium corrected the problem with a 2024 reform of the Allocation de Remplacement de Revenus.

**c. “No secured part” – There is no secured part of benefits to address the extra costs of living with a disability or assistance**

Loss of disability benefits, where applicable, does not mean loss of all supports, but those are often in-kind or non-cash and may be insufficient to cover ongoing extra costs of living with a disability.

In several EU countries among those that use means-testing for disability benefits in cash, earning income from work can lead to the loss of most or all disability benefits, without guaranteeing a protected part to cover the extra costs of living with a disability. This is particularly noted in Bulgaria, Cyprus, France, Greece, Latvia, Lithuania, Malta, the Netherlands, Poland, Portugal, and Romania. These countries are highlighted for having systems where disability allowances are often reduced or withdrawn entirely when a person enters employment, leaving individuals without a secured minimum to cover disability-related expenses.

Conversely, Belgium, Croatia, Denmark, Germany, Italy, Slovakia, and Sweden are among countries that provide a protected part of disability benefits in cash, regardless of work income, specifically to address the

extra costs. Croatia, notably, restructured its disability benefit system in 2024 to ensure clearer differentiation between income-replacement measures and support schemes designed to address the additional costs that arise due to disability. In Sweden and Denmark, notably, the “higher expenses benefit” is higher if you work than if you don’t work, to reflect extra costs of living for workers with disabilities.

Ireland presents an in-between situation. It ensures that, whatever the amount earned through work, an individual will always retain at least a part of their means-tested non-contributory benefits thanks to an earnings disregard, but only up to a certain level of revenue, and it is not specifically targeted at the extra costs of living with a disability.

In most EU countries, the secured part of disability benefits (if it exists) is generally found within the non-contributory scheme, as these are intended to ensure a minimum income and sometimes cover disability-related costs. Germany and Italy are exceptions, with a secured part maintained even within the contributory scheme.

The total loss of benefits (without a protected portion) is a direct cause of the lack of financial incentive to work. Indeed, if a disabled person loses 100% of their benefits while working, they must not only live on an often modest salary, but also bear the additional costs related to their disability alone, which makes work unattractive or unreasonable.

There is a growing call for reforms to ensure that disability benefits are not fully withdrawn when a person starts working, and that a protected part is maintained to cover the extra costs associated with disability.

Note: the analysis is complex because there are countries (Spain for example) where, even if disability benefits in cash are totally stopped, PWDs who work are entitled to increased tax deductions, the rate of which varies according to the severity of the disability, which makes it possible to protect a portion of resources to meet additional costs. This note however, as indicated earlier, does not consider tax systems.

**d. “No fallback” – Professional earnings or working time may lead to loss of contributory benefits without fallback on non-contributory benefits, because these are strictly alternative**

Some countries apply a strict exclusion between contributory and non-contributory benefits, even in cases where entitlement to contributory benefits is lost due to earned income. In these countries, having once

been entitled to a contributory benefit (even if it is subsequently lost due to excessive income) can prevent access to the (main) non-contributory benefits, even if the earnings threshold is higher for these benefits. The logic is: if you have contributed, even a little, you are covered by the contributory scheme, and the loss of this right does not (or not automatically) give you access to social assistance disability benefits.

Some notable examples are Greece and Portugal, and to a lesser extent—with derogations generally linked to a very low level of resources or not having contributed enough—Netherlands (for Wajong only, and not automatically, i.e., through more restrictive reassessment of the disability), and Spain. In Slovenia, while the two types of benefits are not strictly alternative, there is no automatic transition to non-contributory benefits; only general means-tested social assistance is guaranteed.

**e. “The household” – The means-testing for non-contributory benefits looks at the household, not the individual beneficiary**

In some of the countries where means testing is used, depending on the type of benefit, the means considered at the household level. This is the case in Ireland, Luxembourg, and Slovakia, but also in Belgium and Spain (with an impact of some regional schemes).

In practice, this not only affects the possibility for the PWD to cumulate the benefits with earnings from work; it also shifts to other members of the household the burden of the extra cost of living with a disability and constitutes a further barrier to the employment of PWDs.

France has recently moved from household to individual unless this is unfavourable to the beneficiary.

**f. “No trial period” – There is no trial work period during which re-entry into previous entitlement to benefits is guaranteed**

Few countries (Belgium, Denmark, Finland, France, and Sweden, but also Ireland if considering non-contributory benefits only) have well-defined rules allowing beneficiaries to return to their previous disability benefits if they stop working after a while, without a new application or full reassessment (if the work was compatible with their residual capacity). The trial period length varies by country, typically ranging from 1 to 5 years. The process of return to status quo ante is not always easy: in Sweden, for instance, it is described as rather complex.

Most other EU countries require a new application and medical/financial reassessment to resume disability benefits after stopping work. If the professional experience fails, for instance because they are unable to sustain themselves or to sustain their work schedules, PWDs risk not being able to return to their previous entitlements, placing them in a durable position of precarity. The Netherlands offers trial placements and a no-risk policy, but it does not have a formal guaranteed trial period allowing automatic return to the previous disability benefit without reassessment.

This being said, the trial period criterion should not be given too much importance. Studies show that trial periods are not efficient incentives by themselves.

## 5. Overall assessment of country performance

Due to the reservations expressed in the Annex about documentation biases, we are reluctant to “name and shame” specific countries. Taking into account all the above, we can certainly positively signal countries like Croatia, Czechia, and Sweden as clearly protecting the disability benefits of workers. To a lesser degree, Estonia, Finland, and Latvia also stand **on the positive side of our evaluation**.

Most EU countries, with many nuances, more or less discourage beneficiaries of disability benefits in cash from entering paid work, and more important in this note than the situation in a given country at a given time, are the proposed criteria for identifying bad practices, and how we come to spot worse practices.

Indeed, some countries show a marked “disability benefits trap” pattern due to the accumulation of negative criteria, or the specific combination of some negative criteria or characteristics.

It is bad, as a matter of principle, if any of the following three criteria applies, and it is worse if two or three apply:

- “One or the other”, because residual work-ability is denied.
- “No secured part”, because the extra costs of living with a disability are ignored
- “The household”, because the extra costs of living with a disability are shifted on to relatives

“What for?” is largely found across the EU. To distinguish worst practices, based on that criterion, the devil is in the detail: are all three

disincentivising patterns described under “What for?” observed? Both for contributory and non-contributory benefits?

“No fall-back” and “no trial period” are relatively less important criteria, to characterise bad practices. However, when both are present, they significantly contribute to a “disability benefits trap” situation because, respectively, the combined loss of a safety net and no turning back to the situation *ex ante* make it risky to engage into paid work.

Also to be watched out for is the combination of “One or the other” or “What for?” with how a disability benefits system is organised in terms of contributory vs non-contributory benefits, possibly resulting in a benefits vacuum. For instance: where contributory disability benefits are largely incompatible in practice with any significant earnings from work or there is no real financial incentive to work, yet the system is essentially contributions-based or non-contributory benefits are strictly or essentially alternative to contributory benefits.

With the above in mind, and with all necessary reservations about the accuracy and update of information available on the Internet, the following countries appear **on the negative side of our evaluation**:

**Bulgaria** – Persons without prior insurance coverage (likely more vulnerable) are strikingly and paradoxically disadvantaged compared to those who do: notably, contributory disability benefits are not affected by earnings from work, while non-contributory benefits are beyond a very low threshold of earnings. There is no secured part of non-contributory benefits to cover the extra-cost of living, nor trial period.

**Greece** – Contributory benefits are suspended if the beneficiary resumes employment, regardless of income level (i.e., the incompatibility is statutory) and there is no trial period, nor eventual fall-back on non-contributory benefits if becoming inactive again. As far as non-contributory benefits are concerned, two out of three identified patterns of lack of financial incentive to work are present: immediate reduction and cash-cliff. There is no secured part of non-contributory benefits to cover the extra-cost of living.

**Luxembourg** – Both contributory and non-contributory benefits are in practice incompatible with earnings from work (the threshold of earnings from work is very low). The means-testing for non-contributory benefits considers the household. There is no trial period.

**Portugal** – Contributory benefits are in practice incompatible with earnings from work (the threshold of earnings from work is very low). There is no secured part of non-contributory benefits to cover the extra-cost of living. There is no trial period, nor eventual fall-back on non-contributory benefits if becoming inactive again.

**Also on the negative side, but less notably**, are the following countries:

**Romania** – The threshold of earnings is very low for non-contributory benefits. There is no secured part of non-contributory benefits to cover the extra-cost of living, nor trial period.

**Slovenia** – Two out of three of the identified main patterns of lack of financial incentive (immediate reduction and cash-cliff) are present as far as contributory benefits are concerned. There is no automatic fall-back on non-contributory benefits if becoming inactive again.

The following countries show **a mix of noteworthy best practices and negative features**:

**Belgium** – There is a secured part of non-contributory benefits to cover the extra costs of living with a disability. However, for contributory benefits, all three identified main patterns of lack of financial incentive are present. And the means-testing for some contributory benefits (including in some regional schemes) considers the household.

**Denmark** – There is no means-testing for non-contributory benefits and there is a secured part of benefits in any case (even the taking into account of higher extra expenses if you work). Also, there is a trial period. However, all three identified main patterns of lack of financial incentive are present as regards contributory benefits.

**France** – There is a trial period, and the situation of the household is taken into account only if it is advantageous for the beneficiary. However, for contributory and non-contributory benefits alike, all three identified main patterns of lack of financial incentive are present. There is no secured part of non-contributory benefits to cover the extra-cost of living.

**Germany** – There is a protected part of benefits, but the system is essentially contributory, yet contributory benefits are in practice incompatible with earnings from work (the threshold of earnings from work is very low). There is no trial period.

**Ireland** – For non-contributory benefits, there is a trial period and a somewhat secured part of benefits (at least up to a certain level of revenue and not specifically targeted at covering the extra costs of living with a disability). However, the threshold of earnings is very low, all three identified main patterns of lack of financial incentive are present, and the means-testing considers the household.

**Italy** – There is a protected part of non-contributory benefits, but the threshold of earnings for these benefits is very low. All three identified main patterns of lack of financial incentive are somewhat present as far as contributory benefits are concerned. There is no trial period.

**Netherlands** – Except for some benefits (namely Wajong beneficiaries, i.e., younger PWDs), there is generally no means-testing for non-contributory benefits. And for Wajong, to some extent, there is eventual fall-back on non-contributory benefits if becoming inactive again. However, two out of three of the identified main patterns of lack of financial incentive (more than proportional reduction and cash-cliff) are present as far as contributory benefits are concerned, essentially for partial incapacity. There is no formal guaranteed trial period.

**Slovakia** – Contributory benefits are unaffected by earnings for work and there is a secured part of non-contributory benefits to cover the extra-cost of living. However, the household is taken into account and there is no trial period.

**Spain** – To a large extent, contributory benefits are unaffected by earnings for work (except for the most severe levels of incapacity). However, for non-contributory benefits, the threshold of earnings is very low, all three identified main patterns of lack of financial incentive are present, and there is no secured part of non-contributory benefits to cover the extra-cost of living. There is no trial period, nor eventual fall-back on non-contributory benefits if becoming inactive again.

## 6. Conclusion/Demands

EBU calls on the Commission:

- To promote transparent minimum EU standards for work-income adjustment and the protection, in any means-testing, of a part of non-contributory benefits meant to cover the extra costs of living with a disability, and
- To address the “disability benefits trap” in the framework of the European Semester Process, namely through country reports

looking at Member States where the problem is more evident because of the accumulation or combination of various negative criteria flagged in this report.

## About EBU

The European Blind Union (EBU) is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union. It protects and promotes the interests of blind and partially sighted people in Europe. It represents a network of national organisations of visually impaired people in 40 European countries, including 26 EU Member States.

## Annex – Methodology, documentation biases, sources of information

This note is based on desk research and the systematic use of two distinct tools of artificial intelligence to analyse data, combined with input, comments and proof-reading, in varying length of detail, by most EBU national member organisations in the EU—all but Cyprus, Estonia, Germany, Greece, Luxembourg, Portugal, and Romania, as well as Malta which is not an EBU member.

The analysis is complicated by the following documentation biases that need to be taken into account:

- Some countries (e.g., France, Belgium, Germany, Denmark, Netherlands, Sweden) are the subject of more studies, reports and comparisons, not because their systems are better or worse but because of their size, influence, or active participation in European social policy evaluation programs, or because they have emblematic systems (positive or negative). Other systems, by contrast, are not well documented (Cyprus, Estonia, Greece, Hungary, Latvia, Luxembourg, Poland, Portugal), or only in lesser used languages, and there is likely more to see than meets the eye.
- Systems are often evolving, particularly under the influence of the European strategy 2021-2030 for the inclusion of people with disabilities. Italy and Spain are notable examples of countries with systems in transition or reform.
- Some countries (like Italy or Spain, Belgium also to some extent) have different regional systems, which makes comparisons difficult.
- The information found on the internet more often concerns contributory disability benefits, rather than non-contributory benefits.

Nevertheless, there is a reality of social protection systems: some countries have more protective systems (Germany, Denmark, the Netherlands) due to their social history, their level of wealth, and their political will to include people with disabilities in the labour market, while other countries have more restrictive systems due to budgetary constraints (e.g., Bulgaria, Romania), a historical approach of disability benefits as social minima or complex administrative structures (e.g., Belgium, France). It is not surprising that this reality somehow transpires in our note.

Our main sources of information on the Internet are listed below.

#### General sources

MISSOC database : <https://www.missoc.org/missoc-database/comparative-tables/>

European Social Policy Network study for the European Commission published in 2022: “Social protection for people with disabilities - An analysis of policies in 35 countries”: <https://op.europa.eu/en/publication-detail/-/publication/ef1a0223-9e1e-11ed-b508-01aa75ed71a1/language-en> and the related national reports: [https://ec.europa.eu/social/main.jsp?advSearchKey=ESPN\\_Disability2022&mode=advancedSubmit&catId=22&doc\\_submit=&policyArea=0&policyAreaSub=0&country=0&year=0&iframe=true](https://ec.europa.eu/social/main.jsp?advSearchKey=ESPN_Disability2022&mode=advancedSubmit&catId=22&doc_submit=&policyArea=0&policyAreaSub=0&country=0&year=0&iframe=true)

European Disability Forum analysis of the ESPN report: <https://www.edf-feph.org/report-social-protection-schemes-for-persons-with-disabilities-across-europe/>

OECD report (2022) “Disability, Work and Inclusion - Mainstreaming in All Policies and Practices”: [https://www.oecd.org/en/publications/disability-work-and-inclusion\\_1eaa5e9c-en.html](https://www.oecd.org/en/publications/disability-work-and-inclusion_1eaa5e9c-en.html)

OECE report (2020) “Can disability benefits promote (re)employment? - Considerations for effective disability benefit design”:

[https://www.oecd.org/en/publications/can-disability-benefits-promote-re-employment\\_227e7990-en.html](https://www.oecd.org/en/publications/can-disability-benefits-promote-re-employment_227e7990-en.html)

Report of EDF event on “Increasing cost of living: Persons with disabilities hit harder”: <https://www.edf-feph.org/increasing-cost-of-living-persons-with-disabilities-hit-harder/>

EU Council: <https://data.consilium.europa.eu/doc/document/ST-14495-2022-INIT/en/pdf>

EDF statement about EU Council conclusions on employment and disability (2022): <https://www.edf-feph.org/council-conclusions-on-employment-and-disability-a-mixed-review/>

Eurostat disability statistics on poverty and income inequalities, including the section “In-work poverty”: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability\\_statistics\\_-\\_poverty\\_and\\_income\\_inequalities](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability_statistics_-_poverty_and_income_inequalities)

#### Country-specific sources

##### **Austria:**

Federal government portal / Social Affairs (invalidity / employment-during-pension guidance) -

[https://www.oesterreich.gv.at/en/themen/menschen\\_mit\\_behinderungen/pension\\_und\\_behinderung](https://www.oesterreich.gv.at/en/themen/menschen_mit_behinderungen/pension_und_behinderung)

Care Allowance (Pflegegeld) / Cash benefit for persons with disability/long-term care needs - <https://ageing-policies.unece.org/browse-policy/2567>

##### **Belgium:**

## Loss of disability benefits due to entering paid work – EBU note

Federal Public Service (Social Security) / national invalidity & allowances pages - <https://socialsecurity.belgium.be/en>

Income for persons with a disability – Non-employment-based allowances like “integration allowance” - <https://www.cm.be/en/services-and-benefits/income-persons-disability>

### **Bulgaria**

Ministry of Labour and Social Policy (persons with disabilities / social protection pages) - <https://www.mlsp.govment.bg/eng>

Social assistance for adults with permanent disability - <https://www.refugeelight.bg/en/social-assistance-disability-BG>

### **Croatia:**

Pension Insurance Institute (HZMO) / disability-pension and eligibility pages - <https://www.mirovinsko.hr/en/about-hzmo-211/210>

Cash allowance for persons with disabilities - <https://gov.hr/en/right-to-an-inclusive-supplement/2559>

### **Cyprus:**

Department of Social Insurance / Ministry of Labour — disability benefits and Social Insurance Services pages - <https://www.gov.cy/en/service/disability-benefits/>

Legal reference: Severe motor disability allowance and Social Pension law / Social Welfare Services - <https://www.legislation.gov.uk/eur/2009/988/data.html>

### **Czechia:**

Czech Social Security Administration (disability/invalidity pension pages) - <https://www.mpsv.cz/en/disability-pensions>

Ministry of Labour and Social Affairs / Care allowance (Příspěvek na péči) – Cash benefit for persons dependent on assistance - <https://www.mpsv.cz/en/disability>

### **Denmark:**

Life in Denmark / disability pension & flexi-job (work-and-pension interaction) - <https://lifeindenmark.borger.dk/pension/disability-pension>

### **Estonia:**

Social Insurance Board (Sotsiaalkindlustusamet) — benefits for disabled people (allowances & working-age rules) - <https://sotsiaalkindlustusamet.ee/en/disability-and-welfare-services/benefits-disabled-people>

### **Finland:**

Kela (Social Insurance Institution) — disability allowances, rehabilitation subsidy and disability pension - <https://www.kela.fi/disability>

Disability allowance for adults – Non-means-tested cash disability allowance at different rates - <https://www.kela.fi/disability-allowance-for-adults-amount-and-payment>

### **France:**

Service-public / CPAM guidance on pension d'invalidité and rule on suspension/thresholds when returning to work - <https://www.service-public.gouv.fr/particuliers/vosdroits/F14945?lang=en> and <https://www.service-public.gouv.fr/particuliers/vosdroits/F14945?lang=en>

## Loss of disability benefits due to entering paid work – EBU note

[public.gouv.fr/particuliers/vosdroits/F15973?lang=en](http://public.gouv.fr/particuliers/vosdroits/F15973?lang=en)

CLEISS / Non-contributory disability benefit (Allocation aux adultes handicapés (AAH)) – [https://www.cleiss.fr/docs/regimes/regime\\_france/an\\_4.html](https://www.cleiss.fr/docs/regimes/regime_france/an_4.html)

### **Germany:**

Deutsche Rentenversicherung — Erwerbsminderungsrente, integration measures and rules on combining work and benefits - [https://www.deutsche-rentenversicherung.de/DRV/EN/Leistungen/leistungen\\_node.html](https://www.deutsche-rentenversicherung.de/DRV/EN/Leistungen/leistungen_node.html)

BMAS – Allowances and tax relief for severely disabled persons - <https://gesund.bund.de/en/severe-disability>

### **Greece:**

e-EFKA / Ministry of Labour pages on invalidity (disability) pension and financial support programs - <https://www.gov.gr/en/piresies/ergasia-kai-asphalise/suntaxiodotese/aponome-kurias-suntaxes-anaperias>

Financial support programmes for persons with disabilities – OPEKA - <https://minscfa.gov.gr/en/persons-with-disabilities/allowances/>

### **Hungary:**

official national guidance on rokkantsági (disability) benefits / government social protection pages - <https://navigatehungary.hu/en/employment/pensions/pension>  
Non-contributory disability allowance (“Fogyatékossági támogatás”) - [https://socialprotection.org/sites/default/files/publications\\_files/ESPN\\_HU\\_SocialProtectionDisability\\_2022.pdf](https://socialprotection.org/sites/default/files/publications_files/ESPN_HU_SocialProtectionDisability_2022.pdf)

### **Ireland:**

Department of Social Protection — Disability Allowance and related supports (incl. rules about work and entitlements) - <https://www.gov.ie/en/department-of-social-protection/services/disability-allowance/>

### **Italy:**

INPS (National Social Security Institute) — invalidità civile / pensione di inabilità - <https://www.inps.it/it/en/dettaglio-scheda.en.schede-servizio-strumento.schede-servizi.domanda-invalidita-civile-e-accertamento-sanitario-50004.accertamento-sanitario.html>

Inclusion Allowance (ADI) - <https://www.inps.it/it/en/dettaglio-scheda.en.schede-servizio-strumento.schede-servizi.assegno-di-inclusione-adi.html>

### **Latvia:**

State Social Insurance Agency (VSAA) — invalidity pension - <https://www.vsaa.gov.lv/lv/invaliditates-pensija>

### **Lithuania:**

Sodra (State Social Insurance Fund Board) — disability-pension and allowances - <https://sodra.lt/pensijos/negalios-pensija?lang=en>

Lithuanian Ministry of Social Security – Non-contributory cash allowance - <https://socmin.lrv.lt/en/activities/social-insurance-1/social-insurance-benefits/single-person-benefit/>

### **Luxembourg:**

## Loss of disability benefits due to entering paid work – EBU note

Guichet.lu / Centre commun de la sécurité sociale — disability pension & disabled-workers allowance (RSH) - <https://guichet.public.lu/en/citoyens/travail/conditions-travail/visite-medicale/incapacite-travail-reclassement/pension-invalidite.html>

Allowance for the Severely Disabled (RPGH) –

<https://guichet.public.lu/en/citoyens/aides/travail/inscription-handicape-adem/revenu-personne-gravement-handicapee.html>

### **Malta:**

Department of Social Security / Social Security Portal — invalidity pension and non-contributory disability assistances - <https://socialsecurity.gov.mt/en/information-and-applications-for-benefits-and-services/contributory-pensions/invalidity-pension/>

Non-Contributory Benefits, including “Disability Assistance”, “Severe Disability Assistance” - <https://www.servizz.gov.mt/en/Pages/Inclusion -Equality-and-Social-Welfare/Social-Solidarity/Benefits-and-Services/Non-Contributory-benefits/default.aspx?page=1>

### **Netherlands:**

UWV (Employee Insurance Agency) — WIA / Wajong / occupational-disability benefits and work-integration rules - <https://www.uwv.nl/en/individuals/occupational-disability/wia-benefit>

WIA / Benefit under Work and Income (Capacity for Work) Act – For people disabled/incapacitated - <https://www.netherlandsworldwide.nl/incapacity-benefit/what-is-benefit-under-work-income>

### **Poland:**

ZUS (Social Insurance Institution) — renta z tytułu niezdolności do pracy (disability pension) - <https://lang.zus.pl/benefits/disability-pensions>

Supplementary non-contributory cash benefit for persons incapable of independent existence – Income-tested non-contributory benefit -

<https://www.issa.int/sites/default/files/documents/2024-12/Poland.pdf>

### **Portugal:**

Segurança Social — pensão de invalidez and protection-in-disability - <https://www.seg-social.pt/ptss/pssd/menu/trabalho/reforma-invalidez/pensao-invalidez>

Attendance allowance – <https://www2.gov.pt/en/servicos/requerer-a-prestacao-social-para-a-inclusao>

### **Romania:**

Casa Națională de Pensii Publice (CNPP) — pensia de invaliditate - <https://www.cnpp.ro/en/home>

Allowances for adults and children with disabilities – UNHCR guide -

[https://help.unhcr.org/romania/wp-content/uploads/sites/93/2025/06/Social-benefits-for-person-with-disabilities\\_final\\_ENG.pdf](https://help.unhcr.org/romania/wp-content/uploads/sites/93/2025/06/Social-benefits-for-person-with-disabilities_final_ENG.pdf)

### **Slovakia:**

Social Insurance Agency (Sociálna poisťovňa) — invalidný dochodok (invalidity pension) - <https://socpoist.sk/en/life-situations/pension/how-apply-invalidity-pension>

Allowances for the severely disabled (Liga pre seniorov) -

<https://ligapreseniorov.sk/en/financial-contributions/allowances-for-the-severely-disabled/>

**Slovenia:**

Pension and Disability Insurance Institute (ZPIZ) — invalidska pokojnina (disability pension) - <https://www.zpix.si/content2020en/disability2-pension>

**Spain:**

Seguridad Social / INSS — incapacidad permanente (permanent incapacity) & services for checking benefit status - <https://www.seg-social.es/wps/portal/wss/internet/Pensionistas/Servicios/34887/40968/41025?changeLanguage=en>

**Sweden:**

Försäkringskassan — activity compensation / sickness compensation and disability-related allowances (rules on working while receiving support) - <https://www.forsakringskassan.se/english/disability>