

# ENNHRI CRPD WORKING GROUP NEWSLETTER

JULY-SEPTEMBER 2021 / **ISSUE VI**

Covid-19 is still here – tireless work of NHRIs and OPDs during the Covid-19 Pandemic



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Dear Reader,

It is my absolute pleasure to present to you the VI Newsletter of ENNHRI's CRPD Working Group. This issue covers the period from July to September 2021. The Covid-19 pandemic has worsened the vulnerability of the least protected and most marginalized and especially, of the persons with disabilities. In these unprecedented times, the pivotal role of NHRIs and OPDs has been more vivid than ever before.

NHRIs and OPDs continue to work tirelessly on strengthening the protection and promotion of the rights of persons with disabilities and this issue of the Newsletter is a vivid demonstration of this. It is only with joint effort that we can we overcome challenges and achieve a more sustainable and inclusive future. Let's keep up the good work and be there for the most vulnerable.

This Newsletter has been a useful opportunity to share stories, documents and good practices and draw from each other's experiences. Thus, I want to thank everyone who has been involved in its preparation and I wish to express my most sincere gratitude to the members and observers of ENNHRI CRPD WG and to the ENNHRI Secretariat for their active contribution to this Newsletter.

We will continue to prepare quarterly Newsletters and be active in the work of ENNHRI's CRPD WG. We hope that our activities will have the desired impact and we welcome any suggestions from you to make our work more effective and this Newsletter more useful.

I do hope you find this issue of the Newsletter informative and handy. Please feel free to share it with your colleagues and other interested persons. We would greatly appreciate your feedback.

Yours sincerely,

**Ekaterine Skhiladze**

Deputy Public Defender of Georgia

Chair of ENNHRI CRPD WG

## ENNHRI CRPD WG Members' and Observers' Work on the Rights of Persons with Disabilities

### Albania

Regional offices of the People's Advocate conducted monitoring to assess the accessibility of persons with disabilities with visual and mobility impairments to State institutions where services to citizens are provided. Promotional materials for the rights of persons with disabilities were prepared within the framework of the proactive role of the People's Advocate. **Monitoring visits in 2 psychiatric hospitals were conducted in cooperation with Albanian NPM.**



*The photos were provided by the People's Advocate of Albania*

The main objective of the monitoring was to assess the conditions, quality and methods of treatment of persons with mental health problems as well as the measures taken to implement the recommendations of the People's Advocate. The daily monitoring of on-line portals and media is conducted continuously to identify possible violations of the rights of persons with disabilities. See the details [here](#).

### Bulgaria

The Ombudsman Institution sent recommendations to the relevant authorities to take urgent action to provide adequate information to persons with disabilities and their representatives and to conduct a broad communication campaign for all stakeholders on the procedure for obtaining medical devices and aids after 1 January 2021. **The Ombudsman sent a reasoned opinion to relevant authorities on the procedure of issuance/re-issuance of driving licenses for persons with disabilities.** The opinion raised the issues of complaints regarding the cumbersome procedure for appearing before the Transport Regional Medical Expert Commissions (TRMEC) and the number and location of commissions in the country, which puts those living in the cities in a more favorable position. The Ombudsman made a recommendation to the Ministry of Health regarding the amendments to the legal framework for medical expertise for determining the type and degree of disability and lifetime and permanently reduced working capacity. The Ombudsman brought to the attention of the Minister the issue of the different application of the new provisions and the problem of the established short period within which the affected citizens can benefit from the provided more favorable conditions for appearing before the medical examination bodies. See the details [here](#).

### Croatia

Third regional office of the Ombudsman for persons with disabilities was opened in Rijeka on 15 July. There are 55000 persons with disabilities living in the area. **The Ombudsman for persons with disabilities joined forces with the Gender Equality Ombudsman, Ombudsman for Children and People's Ombudsman at the national level in drafting a special report to the Parliament on the impact of the Covid-19 pandemic on human rights.** The issues highlighted in the report are connected with persons with disabilities living in the residential institutions who are still not able to leave institutions freely or receive visitors. In addition to that, a lot of day programs for persons with disabilities are canceled due to the providers' inability to meet strict Covid-19 preventive requirements. The Ombudsman made a recommendation to the relevant authorities to come up with measures that will ensure the protection of the rights of persons with disabilities and their freedom of movement while at



*The photos were provided by the Ombudsman for persons with disabilities of Croatia*

the same time protecting their health. Regional offices have been active in strengthening the competency of persons with disabilities on the labor market and supporting accessible infrastructure, such as the recently opened open-air inclusive cinema. The Ombudswoman reacted to the omission of disability-related questions from the national census which is underway and emphasized the necessity of including them in the census. See the details [here](#).

## Denmark

In late August, a draft bill on the amendment of the Danish Mental Health Act was sent for public consultation. Among other things, the draft bill proposes that maximum intervals are determined for the medical assessment of the continuation of the use of belt restraints. This proposed amendment shall be seen in relation to the case of *Aggerholm v. Denmark*, in which the European Court of Human Rights found that Denmark violated Article 3 of the European Convention on Human Rights in a case concerning the use of belt restraints for nearly 23 hours. In its public consultation response, **the Danish Institute for Human Rights recommends that the Danish authorities should take further measures to ensure the protection of psychiatric patients' human rights, including the abolishment of the use of belt restraints lasting**

**more than 48 hours.** The extensive use of coercive treatment in Danish psychiatric institutions has been widely criticized. On 6 September 2021, the Grand Chamber of the European Court of Human Rights rejected the referral appeal in the case of *Strøbye and Rosenlind v. Denmark*. The Danish Institute for Human Rights will continue to focus on the issue of voting rights for people who are under guardianship and deprived of their legal capacity.

## France

From August 18 to 23, 2021, the United Nations Committee on the Rights of Persons with Disabilities **[examined France's initial report on the implementation of the Convention on the Rights of Persons with Disabilities](#)**. The Defender of Rights, an independent mechanism responsible for monitoring the UN CRPD, **submitted a parallel report showing an assessment of the effectiveness of the protection of the rights of persons with disabilities.** The Defender of Rights highlights that, in many areas, there is a significant problem with the effectiveness of the implementation of the objectives set by the Convention. There are still many obstacles to the autonomy and inclusion of persons with disabilities linked, on the one hand, to the lack of universal accessibility and, on the other hand, to insufficient or inappropriate responses.

## Georgia

Office of the Public Defender of Georgia (PDO) **published a [monitoring report on specialized facilities for children/persons with disabilities](#)** based on the visits to the boarding houses aimed at assessing the quality of observance of the Minimum Care Standards in Specialized Living Facilities for Persons with Disabilities and Older People, as well as the Child Care Standards, including in the context of the prevention of Covid-19. PDO addressed the relevant authority **[with a general proposal](#)** relating to discrimination on the grounds of disability. The Public Defender stressed that persons with disabilities constantly have to fight for access to the environment, as well as for equal use of various public and private services, while pregnant women with disabilities are even more severely disadvantaged, which makes it necessary to take measures to protect the rights of such persons. During the reporting period, the representatives of the

Public Defender made 5 planned visits to the institutions and services in which persons with disabilities are engaged. PDO prepared comments/opinions on the strategy document on the deinstitutionalization of persons with disabilities/children and presented it to the experts working on the issue along with state representatives. In July, the Public Defender of Georgia held a meeting with the parents of children with spinal muscular atrophy and experts in the field, during which the medical needs of the named target group were discussed and further supported and advocated with the relevant state agencies. See the details [here](#).

## Germany

In its “Information” series, the [German Institute for Human Rights published a summary of the 2019 report of the then Special Rapporteur on the Rights of Persons with Disabilities](#), Catalina Devandas Aguilar, on the rights of older persons with disabilities (A/74/186), which was translated into German in 2020. A section about the situation of older persons with disabilities in Germany was added to the publication. The Institute frequently translates and summarizes reports and documents of the United Nations Special Rapporteurs, Independent Experts and Treaty Bodies. The aim is to disseminate these important documents and the related human rights impulses in Germany and to make them accessible to national actors, to prepare them in an understandable way and to highlight their significance for the national level. Generally, the Institute combines this with recommendations and demands to politics and administration.

## Greece

In September 2021, **the institution of Personal Assistant for persons with disabilities was established in Greece for the first time**. This constitutes a significant development for persons with disabilities living in Greece. The introduction of personal assistance services in the Greek legal framework was a long-standing demand of the disability movement. National Confederation of Disabled People (NCDP) was actively involved during the whole legislative process. NCDP took part in the working group on the establishment of the Personal Assistant for Persons with Disabilities in the Greek legal framework. The

NCDP’s priority, during the process, was to ensure that the “voice” of persons with disabilities will be heard and taken into consideration when developing the legal framework for disability rights. Thus, through Personal Assistance, persons with disabilities in Greece will have the opportunity to be supported in their daily activities in order to improve a better quality of their life and of that of their families. Moreover, the new initiative ensures active participation of persons with disabilities in society according to Article 19 of the UN Convention on the Rights of Person with Disabilities and also in line with GNCHR’s [Observations](#) in relation to the implementation of the UN Convention on the Rights of Persons with Disabilities in the State party. See the details [here](#).

## Ireland

The Irish Human Rights and Equality Commission’s (IHREC) published accounts of its [equality reviews of Ireland’s local government authorities](#), focused on their provision of accommodation to members of Ireland’s indigenous Traveller Community. Amongst the findings of these reviews was that it is unclear to what extent Travellers are included in local authority housing strategies for people with disabilities. **Also in July, the Commission published its Annual Report 2020**. As detailed therein, disability discrimination



*The photo was provided by the Irish Human Rights and Equality Commission*

was the highest area of public contact to the Commission’s information service in 2020, representing 54% of all equality-related concerns raised with the Commission. In August, the Commission published its [Submission on the General Scheme of the Family Court Bill](#) recommending that Government strengthen the protection for marginalized groups who are represented disproportionately within child and fam-

ily law proceedings. In September, the Commission co-published the study [Monitoring Adequate Housing in Ireland](#). The study found that disabled persons are more likely to experience housing quality issues, report an inability to keep their home warm, and face arrears on rent or mortgage payments when compared to non-disabled persons. See the details [here](#).

## Latvia

In July new amendments entered into force for the assistant service for persons with disabilities reducing the monthly duration of service for children and introducing two new types of services – accompanying services for children who do not need special care but need support to move outside the home and municipal services for children who need special care.



The photo was provided by The Ombudsman's Office of the Republic of Latvia

NHRI objected to the changes in the duration and reduction of the assistant salary, emphasizing that it will hinder the attraction of assistant service providers which will create additional obstacles for the families of children with disabilities in finding service providers. **The Ombudsman launched an inquiry into the availability of special medical food to patients with diseases that affect the normal intake of all the nutrients necessary for the body and health.** The Ombudsman concluded that in certain cases (decided by the doctor), depending on the patient's diagnosis and general health, special food should not be considered as a dietary supplement without which the patient can do, but as an essential and even integral part of the treatment process. As a result of the NHRI's recommendation the Government made amendments in the Covid-19 testing procedure for children with disabilities to ensure the realization of their right to education. NHRI announced a call for competition "Annual award in support of persons with disabilities 2021". The award is granted every year since 2015. See the details [here](#).

## The Netherlands

The Netherlands Institute for Human Rights organized two meetings to support its recommendation to the Dutch government that the participation of persons with disabilities in decision-making should be facilitated more structurally. In the first meeting structures and procedures that would be required were discussed. The second meeting focused on the conditions that are necessary to meaningfully involve persons with disabilities in decision-making, such as diversity, transparency, and early and continuous involvement. During the meetings, persons with disabilities and their representative organizations discussed these topics directly with policy-makers working for various Dutch ministries. **The outcomes of these discussions will be included in a toolkit that NHRI is developing to help the national and local government to further implement the UN CRPD.** The toolkit (in Dutch) can be found [here](#).

## Romania

The Romanian Institute for Human Rights (RIHR) submitted [the opinion](#) on the draft law for amending the Civil Code, the Code of Civil Procedure and other relevant acts in accordance with Article 12 of the UN CRPD and Romanian Constitution to ensure proper procedure for order of adjudication of incapacity. RIHR drew attention to the lack of consultations with persons with disabilities and their organizations; the risk that existing and new special guardianship regimes will continue to be applied as substitute forms; the importance for the assessment process to be carried out taking into account a multi-disciplinary and multidimensional approach; the risk that provisions such "a hearing before a judge may be canceled by the judge if such a hearing is deemed to pose a danger to the health of the person concerned" could have the effect of excluding adults with intellectual disabilities from effective participation in the hearing. RIHR submitted the [List of Issues](#) to the UN CESCR for the examination of the 6 periodic reports submitted by Romania. **RIHR is developing a training programme for the staff of the Monitoring Council - autonomous authority under parliamentary control with a mandate to protect, promote and monitor how the rights of persons with disabilities in institutions are respected.**

## Slovenia

NHRI addressed the issue of meeting the mandatory so-called PCT condition (proof of recovery from a COVID-19 disease /vaccination against SARS-COV-2 / negative PCR rapid antigen test) for those providing personal assistance for persons with disabilities and those receiving it. NHRI recommended that users of personal assistance should be exempt from the PCT condition. **Following the NHRI's recommendation the Government set an exception regarding the mandatory wearing of masks for persons with special needs who can't use a protective mask for objective reasons.** NHRI analyzed the physical accessibility of all social work centers in Slovenia. NHRI also intervened regarding ensuring the accessibility of public transport for persons with disabilities and furthermore called on the relevant ministry to remove built obstacles. In cooperation with the Judicial Training Center at the Ministry of Justice, NHRI organized a two-day Mental Health Days conference. This year, the conference was dedicated to the treatment of children and adolescents under the Mental Health Act and treatments during the epidemic. It aimed to encourage a wide range of stakeholders to cooperate and engage more actively to make the treatment of children and adolescents as effective as possible. See the details [here](#).

## Ukraine

NHRI continued monitoring of media, social networks, legal acts and other sources on the state of observance of the rights of persons with disabilities in terms of accessibility. In the period from July 1 to September 30, 2021, the Commissioner received 145 reports on violations of the rights of persons with disabilities. **In the third quarter of 2021 the Central Office of the Commissioner and regional representatives made 83 monitoring visits on the observance of the accessibility rights of persons with disabilities and other low-mobility groups:** 30 of them were online and 53 were on-site. The results of the monitoring show that persons with disabilities continue to face the problem of discriminatory treatment, both by public authorities and by private legal entities. According to the Commissioner's recommendations the vast majority of facilities have been brought in accordance with the standards, and action plans have been developed for the rest in order to protect the rights and freedoms of persons with disabilities in terms of accessibility. Given the state of realization of constitutional rights and freedoms of the persons with disabilities, the Commissioner started the preparation of a special report "On the state of observance of the rights and freedoms of persons with disabilities and protection from discrimination". See the details [here](#).

## ENNHRI and ENNHRI CRPD Working Group's Work on the Rights of Persons with Disabilities

On 21 September 2021, 12 ENNHRI members and 2 close partners participated in a regular (online) meeting of ENNHRI's CRPD Working Group. The meeting facilitated an exchange of information and practices, focusing on planned activities for 2021, and a discussion about the future plans of the WG. At the beginning of the meeting, a summary was made of the work the WG has done in the course of 2021.

On August 16, 2021, ENNHRI published Annual Report 2020, which highlights NHRIs' crucial role in promoting and protecting human rights during COVID-19. Annual Report outlines the key achievements of NHRIs throughout 2020, whilst showing how NHRIs continued to provide human rights monitoring, reporting and support to rightsholders through innovative adaptations in their work practices.

According to the [report](#), 2020 saw major developments in NHRIs' contribution to monitoring the rule of law at the European level. ENNHRI produced a comprehensive report on the state of the rule of law in Europe. A Collaborative effort across ENNHRI's membership, brought together individual NHRIs' perspectives on the situation in their countries. Promoting and protecting the rights of persons with disabilities during the Covid-19 pandemic were highlighted in the report as well.

## Regional and International Actors' work on the Rights of Persons with Disabilities

Regional and international actors have continued to actively work towards the protection and promotion of the rights of persons with disabilities. Various documents were adopted and guidelines developed.

## United Nations

On July 19, 2021, the United Nations **Special Rapporteur on the Rights of Persons with Disabilities, Gerard Quinn**, published his [annual report on the rights of persons with disabilities in armed conflicts](#).

The United Nations Independent Expert on the Enjoyment of all Human Rights by Older Persons, Claudia Mahler, published two annual reports this year: One on [ageism and age-discrimination](#) and the other on [the human rights of older women and the intersection between ageing and gender](#). In both reports, many passages related to disability can be found, for example that older women with disabilities are more likely to be institutionalized.

Both mandate holders and prepared reports deal with the intersectionality of persons with disabilities and older persons, respectively, and try to address possible multiple discriminations. For example, in her report on ageism, the Independent Expert addresses the interaction between ableism and ageism.

On Tuesday, 14th of September, 2021 the UN CRPD Committee closed its 25th Session. During this Session, the Committee held two online constructive dialogues with and adopted concluding observations on France and Djibouti. The documents adopted during the sessions, as well as statements delivered in the opening (16 Aug 2021) and closing (14 Sep 2021) are available on the webpage of the Committee.

**The main decisions presented by the UN CRPD Committee during this closing Session are the following:**

- The Committee established a Working Group on women and girls with disabilities;
- The Committee adopted an annotated outline of its guidelines on deinstitutionalization;
- The Committee continued its engagements with the Special Rapporteur on the Rights of Persons with Disabilities and the Special Envoy of the Secretary-General for Disability and Accessibility.

From June 3 till August 12, 2021 UN has organized international webinar series on the topic of "Becoming employers of choice for people with disabilities: Challenges and opportunities for global intergovernmental organizations".

This series of webinars aimed to provide guidance to organizations on how best to approach the different challenges and offers a space to share best practices among global organizations.

Overall there have been [6 webinars](#).

**The Stakeholder Group of Persons with Disabilities held an event at the sidelines of the HLPF on Friday, 9 July 2021.** The theme of Building an Inclusive and Effective Path for Civil Society Engagement in the HLPF was covered by a panel of people from organizations of persons with disabilities from different countries.

During the meeting there was a moderated discussion on the role of persons with disabilities and their representative organizations in data processes with a focus on key experiences and research findings from national and global levels.

In response to the COVID-19 pandemic, the Stakeholder Group of Persons with Disabilities carried out two phases of qualitative research to gather information on the experiences of persons with disabilities. The first phase of research took place in 2020 with disability movement leaders from around the world and the second phase followed in 2021 exploring three countries in-depth: Bangladesh, Bolivia, and Nigeria.

**On September 16 and 17, 2021 the Committee on the Rights of the Child held its Day of General Discussion on Children’s Rights and Alternative Care.** The event was held online and included two plenary sessions and five thematic working groups in parallel, throughout the two days.

Speakers included CRC Committee members, CRPD Committee chair Rosemary Kayess, States’ representatives, children with lived experience of alternative care, representatives from civil society, and academia.

The submission also requests the full de-institutionalization of children with disabilities, in consultation with organizations of persons with disabilities, including measures to:

- Develop family-based alternative care systems inclusive of children with disabilities,

including for those cases of individual emergency;

- Stop the development and funding, and dismantle and phase out any other care system based on residential institutions, regardless of their size;
- Develop response systems so that, when facing an individual emergency (sudden abandonment or loss of parental care), they are able to immediately strive to find a family setting-based solution for the child with a disability.

## Equinet

The COVID-19 pandemic highlighted blatant health inequalities and the importance of securing egalitarian access to healthcare. Some groups are particularly affected by unequal and discriminatory healthcare practices, such as older people, people with disabilities, trans people, intersex people or Roma people. Adopting a multi-ground viewpoint, the perspective [“Equality, Diversity, and Non-Discrimination in Healthcare: Learning from the Work of Equality Bodies”](#) builds on the recent challenging context to establish the learning from the work of equality bodies on healthcare for policy-makers at the European and national level and equality bodies themselves. Based on the findings of this perspective, **Equinet organised its first-ever [Webinar series on equality, diversity and non-discrimination in healthcare](#), which featured a strong disability perspective through the interventions of the EC, EDF, Mental health Europe and Validity Foundation among others.**

Additionally, the Commission for the Rights of Persons with Disability (CRPD) in Malta shared [their Disability Equality Training initiative](#). Through this initiative persons with disabilities train different stakeholders (including healthcare workers) covering disability etiquette and the dos and don’ts when interacting with persons with disability, as well as the perceptions of disability (social and medical model) and a short overview of existing legislation for public and private organisations. In August, Equinet actively participated in the European Commission initiative on binding standards for Equality Bodies, which should include strengthening their mandate.

**The European Commission announced that future legislation reinforcing Equality Bodies is to be expected by 2022.** Find more information about the process [here](#). The Equinet Handbook '[Stepping Up our Engagement with Youth](#)', was published in September. Developed by the Working Group on Communication Strategies and Practices, with the cooperation of the European Youth Forum, encourages those working on equality and non-discrimination to think about how to tackle discrimination based on the needs of young people, and to cooperate with them to understand what those needs are, including those living with a disability. Equinet published on the 29 of September a report regarding the [collection and use of complaints data by equality bodies](#) compiled by the Equinet Working Group on Research and Data Collection which analyses how equality bodies collect and use data on complaints and what challenges they face in doing so. The primary goal is to identify commonalities among equality bodies regarding the information on complaints they collect and the purposes for which they use these data. In doing so, the report is aimed at developing recommendations on how the collection and use of complaints data can be improved and at showcasing practices that might

help to overcome commonly shared challenges. Last but not least, the report also tries to assess the feasibility of a possible future report on the work and experiences of equality bodies throughout Europe that may be based on such complaints data.

**On the 27th of September Equinet adopted its 2022 Work plan in an extraordinary annual meeting.** Among other activities, Equinet will be organising a webinar series on Equality bodies building their capacity regarding psychosocial disabilities and persons with mental ill-health in 2022. Additionally, Equinet is actively engaging with CSOs and the European Parliament regarding [the latest draft](#) for the Horizontal Directive proposal shared by the Portuguese presidency containing significant setbacks, including, among others the disappearing of the articles referring to accessibility and the very restrictive reasonable accommodation provisions which contain a very wide and abstractly constructed exception for the Member States.

## Resources

International Solidarity Alliance with UNICEF [works](#) to create an inclusive disability strategy and research agenda for children with disabilities.

In August, 2021 UNICEF convened a consultation with IDA, which covered the gaps and priorities related to children with disabilities, steps for a transformative research agenda and UNICEF's added value on the disability agenda.

Rosangela Berman Bieler, Chief of the UNICEF Disability Section, recalled the successful actions taken through the IDA-UNICEF collaboration, including inclusive humanitarian actions, empowerment of youth with disabilities, and strategic political collaborations. This newest collaboration will feed into the UNICEF Disability Strategy and Action Plan, as well as the Global Research Agenda for Children with Disabilities.

**UNICEF has committed to continuing consultations with OPDs so that they can share their priorities and contribute to setting the research agenda on the rights of children with disabilities.** Future rounds of consultations, surveys and interviews are foreseen through 2021 and into the beginning of 2022.

On August 16, 2021 The Committee on the Rights of Persons with Disabilities [opened](#) its twenty-fifth session online, hearing from the Director of the Human Rights Council and Treaty Mechanisms Division at the Office of the High Commissioner for Human Rights, who was grateful to the Committee for its devotion to avoiding a human rights protection gap during this difficult period and for hosting seven online regional consultations.

In his opening statement, Mahamane Cissé-Gouro, Director of the Human Rights Council and Treaty Mechanisms Division at the Office of the High Commissioner for Human Rights, **welcomed the most recent ratifications of the Convention by Botswana**

**and Uzbekistan last month, as well as the ratifications of the Optional Protocol by Georgia and Sao Tome and Principe, for total ratification of 184 and 99 States parties respectively.** The Committee then proceeded to adopt the agenda of the twenty-fifth session, which run from 16 August to 14 September 2021, and during which the Committee reviewed reports presented by Djibouti and France.

EDF [welcomed](#) the final adoption of the Neighbourhood, Development and International Cooperation Instrument (NDICI) – 'Global Europe' where persons with disabilities have been fully included. With this funding instrument, the EU dedicated €79.5 billion in current prices to foster global recovery over the next seven years. It is a formidable outcome that will help EDF to advocate for financing for disability-inclusive development in the EU work around the globe. Persons with disabilities, including the UN Convention on the Right of Persons with Disabilities are mentioned six times in the final document.

**EDF** published documents concerning disability rights in the third quarter of 2021:

- Accessible Online Meeting Toolkit: [<https://www.edf-feph.org/publications/accessible-online-meeting-toolkit-digital-accessibility-training-session-4/>](https://www.edf-feph.org/publications/accessible-online-meeting-toolkit-digital-accessibility-training-session-4/);
- Report on Access to cross border healthcare by patients with disabilities in the European Union: [<https://www.edf-feph.org/publications/access-to-cross-border-healthcare-by-patients-with-disabilities-in-the-european-union/>](https://www.edf-feph.org/publications/access-to-cross-border-healthcare-by-patients-with-disabilities-in-the-european-union/);
- EDF position paper on the reform of the European Union Electoral Law: [<https://www.edf-feph.org/publications/edf-position-paper-on-the-reform-of-the-european-union-electoral-law/>](https://www.edf-feph.org/publications/edf-position-paper-on-the-reform-of-the-european-union-electoral-law/);
- EDF Position paper on Social Taxonomy: [<https://www.edf-feph.org/publications/edf-position-paper-on-social-taxonomy/>](https://www.edf-feph.org/publications/edf-position-paper-on-social-taxonomy/).

We invite you to share your activities as well as any feedback and questions by writing to the Office of Public Defender of Georgia at

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