

# PATHS2INCLUDE submission in response to the strategy for the rights of persons with disabilities up to 2030 public consultation

With the [Strategy for the rights of persons with disabilities 2021-2030](#), the European Commission aims to improve the lives of persons with disabilities in Europe and around the world by eliminating barriers. The Strategy covers multiple areas, including social protection and employment. To promote persons with disabilities' social inclusion and economic autonomy through employment, the European Commission further introduced the [Disability Employment Package](#). These two instruments also aim to reinforce the earlier adopted Equality Framework Directive ([2000/78/EC](#)).

Nevertheless, only 56% of persons with disabilities aged 20-64 participate in the labour market, compared to 84% of those without disabilities according to the latest numbers.<sup>1</sup> Our research found that disability—measured as health-related limitations—remains one of the most significant barriers to labour market attachment across groups and periods.<sup>2</sup>

Updating the Strategy with the Communication 'Enhancing the strategy for the rights of persons with disabilities up to 2030' offers an opportunity to set new priorities and intensify efforts towards greater inclusion of persons with disabilities into the EU labour market. Expanding the labour force by increasing the participation of underrepresented groups enhances productivity and strengthens the resilience of labour markets to demographic shifts. This reduces pressure on pension systems, healthcare, and public finances, making it a vital step towards boosting the EU's long-term competitiveness and preparedness for future economic and social challenges.

This document draws on [PATHS2INCLUDE](#)<sup>3</sup> research findings and aims to fill in gaps in data and provide policy recommendations for promoting persons with disabilities' labour market participation, with the aim of implementing the Strategy for the rights of persons with disabilities 2021-2030 goals. The recommendations are especially relevant for EU policy-makers, public authorities, statistics institutes, Public Employment Services and Non-Governmental Organisations providing employment support, as well as social partners.

<sup>1</sup> European Commission Directorate-General of Employment, Social Affairs and Inclusion. (2025) *Employment and social developments in Europe 2025*. Publications Office of the European Union.

<sup>2</sup> Valls, O., Vivoli, A., Samuel, R., & Ugreninov, E. (2025). *Mapping labour market attachment among vulnerable groups in European countries: health-related and intersectional barriers before and after COVID-19 pandemic*. PATHS2INCLUDE working paper series. [Available online](#).

<sup>3</sup> [PATHS2INCLUDE](#) is a 3-year research project funded by Horizon Europe that investigates the multi-dimensional aspects of discrimination, policies that could reduce inequalities and promote social inclusion in European labour markets and risk factors of vulnerability that may arise in the future of work. The research focuses on three key labour-market processes: recruitment; career paths; and early exit from working life, giving particular attention to labour-market participation at the intersection of gender, ethnicity, age, health, disability, and care responsibilities.

## 1. Gaps in data affect both the quality of research and the capacity for evidence-based policy design

The European Strategy for the Rights of Persons with Disabilities 2021-2030 explicitly states that monitoring progress across Member States depends on improving statistical data on the situation of persons with disabilities.<sup>4</sup> Without such data, researchers and policymakers cannot fully assess the barriers faced by persons with disabilities, nor identify which policy interventions are most effective in addressing their exclusion from the labour market.

Our review of European and international databases on employment and labour market information shows that these databases lack detailed and harmonised data to assess the labour market situation of persons with disabilities.<sup>5</sup> EU-SILC, the European Social Survey (ESS), the Study of Ageing, Retirement and Health (SHARE) and the European Labour Force Survey (LFS) rely on the Global Activity Limitation Indicator (GALI) to measure disability, which captures whether individuals experience limitations in 'activities people usually do' due to a health problem. However, disability does not arise from limitation alone but emerges from the interaction between those limitations and the physical, social, and institutional barriers that shape people's daily lives.<sup>6</sup>

At the same time, there is a lack of comparative data. Although Eurostat provides harmonised questionnaires, Member States retain discretion in translating and contextualising items which can subtly but significantly alter meaning, especially for health- and disability-related questions. This results in a fragmented picture, for instance, the share of people reporting a long-standing health problem ranges from 33.8% in Germany to just 6.8% in Romania.<sup>7</sup> These figures are nearly impossible to interpret without understanding how respondents in each context perceive health problems, chronicity, or the social acceptability of disclosing limitations.

To better understand disability as an interaction between individual limitations and environmental barriers, the updated Strategy must promote data collection on those environments, including information on accessibility, social supports, discrimination, workplace accommodations, and community infrastructure, for dismantling barriers rather than merely documenting limitations. To harmonize disability-related questions across countries, translation protocols, interviewer guidance, and methodological standards must be tightened. Finally, administrative data, qualitative datasets, big data, and other non-traditional sources can complement survey measures and reveal patterns that traditional instruments cannot capture.

<sup>4</sup> Strategy for the Rights of Persons with Disabilities 2021-2030, 2021. [Available online](#).

<sup>5</sup> Valls et al. (2024). *At-risk groups in the labour market: A comprehensive overview of relevant theoretical and methodological literature, political measures, and existing data across Europe and national surveys and register data*. PATHS2INCLUDE working paper series. [Available online](#).

<sup>6</sup> See also our opinion piece on disability statistics, [available online](#).

<sup>7</sup> Valls et al. (2024). *At-risk groups in the labour market: A comprehensive overview of relevant theoretical and methodological literature, political measures, and existing data across Europe and national surveys and register data*. PATHS2INCLUDE working paper series. [Available online](#).

Carefully designed data-mining techniques can help extract meaningful insights from existing information, improving the evidence base while new survey tools are developed.

## **2. Disability remains one of the most significant factors shaping labour market exclusion**

The evaluation of the 2010-2020 Disability Strategy identified employment as one of the five top policy priorities for future actions.<sup>8</sup> Indeed, PATHS2INCLUDE findings show that disability—measured as the limitations associated with health conditions—remains one of the most significant drivers of labour market exclusion.<sup>9</sup> But this occurs not in isolation: disability interacts with gender, socioeconomic background, education, economic context and other broader contextual conditions, amplifying disadvantage in ways that remain insufficiently understood.

These factors combine to create specific challenges and barriers to labour market entry, stability, and progression. Policies designed to strengthen the labour market attachment of persons with disabilities need to look at the intersectional nature of disadvantage, as one-size-fits-all approaches are likely to be inadequate considering such complexity.

## **3. Persisting gap between formal disability policy frameworks and organisational practice**

PATHS2INCLUDE conducted interviews with employers in Germany, Norway, Poland, and Romania to explore how organisations respond to vulnerabilities related to health limitations and disability, age, and caregiving responsibilities. The qualitative data reveal a consistent gap between formal disability policy frameworks and actual organisational practices. Each country maintains legal or policy provisions, yet the interviews show divergent ways in which these translate, or fail to translate, into practice.<sup>10</sup>

To close the gap between formal disability rules and real hiring, policies should redirect effort from monitoring compliance to supporting organisations with the implementation. The Strategy should facilitate access to disability employment support for employers, particularly small and medium-sized enterprises, by creating a single, user-friendly entry point that brings together incentives, subsidies, and accommodation services. Clear information on accessibility providers would allow employers to quickly identify sources for assistive technologies, workplace adjustments, or specialised training. In parallel, targeted support is needed to upgrade organisations' physical and digital infrastructure, including buildings, websites, recruitment platforms, etc., to meet accessibility standards. Simplifying and centralising support in this way

<sup>8</sup> Strategy for the Rights of Persons with Disabilities 2021-2030, 2021. [Available online](#).

<sup>9</sup> Vivoli, A., Biggeri, M., Ciani, F., Grilli, L., Ayllón, S., Samuel, R. & Valls Casas, O. (2024). *Assessing the determinants of labour market inclusion for vulnerable European citizens: An eco-systemic and multi-level approach*. PATHS2INCLUDE working paper series. [Available online](#).

<sup>10</sup> Tufă, L., Katarzyna Bell, J., Precupetu, I., Maria Radogna, R., Reiter, S., Smoter, M. & Ugreninov, E. (2025) *Fostering Inclusion of Workers in Vulnerable Situations: Practices and Policies at Company-Level. Evidence from qualitative interviews in four countries: Norway, Germany, Romania, Poland*. PATHS2INCLUDE working paper series. [Available online](#).

would lower administrative barriers and enable employers to translate inclusive hiring commitments into practice.

**Key recommendations:**

- Strengthen disability statistics by collecting larger samples and richer data on the context in which people live, facilitating harmonisation across countries and making greater use of data mining and secondary sources.
- Design policies with an intersectional approach.
- Promote skill development programs focused on digital and social competencies to enhance labour market participation without requiring occupational changes.
- Ensure the full implementation of Directive 2000/78/EC on equal treatment in employment and occupation.
- Support employers in enhancing workplace accessibility for persons with disabilities.
- Centralise and simplify support systems to reduce administrative burdens for employers.



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