



Transposing the EU Directive on Combating Violence Against Women

European Disability Forum

April 2025

**Advocacy Guidance for Organisations of Persons with
Disabilities (OPDs) and Allies**



Funded by the European Union.

Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Commission.

Neither the European Union nor the granting authority can be held responsible for them.

Contents

| | |
|---|-----------|
| Introduction..... | 3 |
| About the European Disability Forum | 3 |
| Background | 3 |
| Part 1 – Understanding the EU Directive on Combating Violence Against Women..... | 4 |
| Overview of the Directive | 4 |
| Transposing the Directive into national law | 6 |
| Engaging with national governments..... | 8 |
| Challenges in transposition..... | 11 |
| Part 2 – Advocacy to combat violence against women and girls with disabilities | 12 |
| Key areas for advocacy..... | 12 |
| Filling the gaps..... | 13 |
| Advocacy strategies for OPDs | 16 |
| Conclusions..... | 21 |
| Annexes | 22 |
| Annex 1 - Letter Template | 22 |
| Annex 2 - Resources for further support | 26 |
| Document credits..... | 27 |

Introduction

About the European Disability Forum

The European Disability Forum (EDF) is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Background

In May 2024, the European Union (EU) adopted the first EU law to combat violence against women and domestic violence: the [EU Directive on combating violence against women](#).

To become a reality, this new law needs to be translated into the law and policy of each of the 27 EU member states. Countries have until 14 June 2027 to transpose the Directive.

Civil society organisations, including organisations of persons with disabilities (OPDs), have an important role to play for an ambitious transposition of the Directive. It is important for the disability movement to be involved because women and girls with disabilities continue to face high risk of gender-based violence and go through many issues to receive support and justice when they are victims of violence.

This guidance aims to help national organisations to advocate for the rights of women and girls with disabilities and make this new EU law a reality. It also explains how to use the transposition process as an opportunity to ask for better protection against violence.

The guidance is divided into two main parts. The first part gives information about the Directive and its implementation. The second part

is focused on tips for national advocacy. At the end, two annex documents are available to support the advocacy efforts.

Part 1 – Understanding the EU Directive on Combating Violence Against Women

Overview of the Directive

The [EU Directive on Combating Violence against Women](#), adopted in 2024, represents the very first law adopted by EU to address and prevent violence against women and domestic violence. The Directive mandates member states to have specific laws and policies to protect women from violence, including domestic violence, (as they are defined under national laws). On top of this, the Directive requires all EU countries to criminalise female genital mutilation, forced marriage and some forms of cyber violence and harassment.

The Directive establishes provisions for prevention, protection, and prosecution, ensuring that women victims of violence have access to appropriate support services and that offenders are held accountable. A significant focus of the Directive is improving victim support, such as providing shelters, psychological help, and legal assistance, while promoting coordinated actions between member states.

One of the Directive's key strengths is its inclusivity, particularly for **women and girls with disabilities**. Indeed, the law makes specific reference to women with disabilities and to the UN Convention on the Rights of Persons with Disabilities (CRPD). This is critical, as women with disabilities are disproportionately affected by violence, facing higher rates of violence and abuse compared to women without disabilities. They also often encounter additional barriers to reporting violence, such as

inaccessible services or a lack of appropriate support in navigating legal systems¹.

The Directive calls for member states to:

- Create **aggravating circumstances** for offences committed against a person with disabilities (article 11 referring to “a person made vulnerable by particular circumstances, such as a situation of dependence or a state of physical, mental, intellectual or sensory disability”). This should apply to all offences that member states have to criminalise under the Directive - female genital mutilation, forced marriage, cyber violence and cyber harassment (articles 3 to 8).
- Issue **guidelines** for law enforcement and prosecutorial authorities, including on how to treat victims in a trauma-, gender-, disability- and child-sensitive manner (article 21).
- Ensure the **availability and accessibility of helplines for victims**, including end-users with disabilities by putting in places measures such as support in a language that is easy to understand (article 29).
- Ensure that **all support services covered by the law have sufficient capacity to accommodate victims with disabilities**, considering their specific needs, including personal assistance (article 33).
- Adopt **preventive measures and information presented in a format accessible** to persons with disabilities (article 34).
- Ensure justice professionals receive **general and specialist training** that is human-rights based, victim-centered and gender-, disability-, and child-sensitive (article 36).

¹ [European Disability Forum, Position paper on violence against women and girls with disabilities in the European Union \(2021\)](#)

Despite these advancements, there are notable **gaps** in the Directive, particularly regarding issues such as **forced sterilisation, rape, sexual harassment** and the lack requirement to collect **data disaggregated** by disability status. One significant omission is the lack of explicit provisions addressing **forced sterilisation** of women and girls with disabilities. In practice, the Directive refers to forced sterilisation as form of violence against women but does not require EU countries to ban it. In some EU countries, this practice continues², particularly among women with intellectual or psychosocial disabilities. This violates their bodily autonomy and constitutes a form of gender-based violence. The Directive does not adequately address this issue, leaving a major gap in the protection of women's rights.

Another important omission is the lack of inclusion of a common definition and **criminalisation of rape**. Furthermore, while the Directive acknowledges the importance of tackling **rape** and **sexual harassment**, it does not fully account for the unique challenges faced by women with disabilities in these contexts. Many women with disabilities may struggle to report sexual violence due to communication barriers, a lack of accessible services, or societal stigma surrounding their experiences.³ As a result, these women are often left without the support of justice they need after being victimised.⁴ The Directive could be more explicit in ensuring that mechanisms for reporting rape and sexual harassment are universally accessible and adapted to the rights and requirements of all women, including those with disabilities.

Transposing the Directive into national law

Transposition is the process by which member states turn EU Directives into their own national laws. Directives need to be transposed because

² [EDF webpage on forced sterilisation in the European Union](#)

³ [European Disability Forum \(EDF\), Position paper on "Violence against Women and Girls with Disabilities in the European Union" \(2021\)](#)

⁴ [Council of Europe, Commissioner for Human Rights comment on "Addressing the invisibility of women and girls with disabilities" \(2022\)](#)

unlike EU regulations (another type of EU law), which apply directly to all EU countries, Directives need to be made into national laws to be effective.⁵

Member states will have until **14 June 2027** to transpose this Directive. They also need to inform the European Commission when the laws are in place.

Each national government is responsible for transposing the Directive into national law, meaning that they need to adopt new legislation or reform existing laws in order to comply with the Directive, and they are responsible for the implementation. For this Directive, it would normally be for the **Ministry of Justice** of member state to take measures for transposition, together with their **national parliament**.

The role of the European Commission will be to check if the new national laws achieve the goals of the Directive and to ensure that the laws are adopted on time. The Commission also provides guidance on transposition through workshops it organises for member states.

If a member state does not adopt the required laws or if the laws don't meet the Directive's goals, the European Commission can open an infringement procedure. The European Commission has the power to pursue [infringement proceedings](#) against a particular member state in case of late, incorrect transposition or application of the Directive. The European Commission may learn about such infringements through complaints by citizens, organisations (for example, OPDs), parliamentary questions or monitoring carried out by independent consultants.

In case the situation is not solved, the Commission can take the case to the Court of Justice of the European Union. If the Court agrees with the

⁵ [EUR-Lex, Transposition](#)

European Commission, and the member state still doesn't follow the decision, the Court can impose fines or penalties.

The role of OPDs and allies in the transposition process is crucial. It is a moment for OPDs to ensure that the transposition of the Directive leads to concrete national provisions promoting and protecting the rights of women and girls with disabilities, and it is an opportunity to address the gaps of the EU legislation.

Regarding this Directive this is key for several reasons:

- Women and girls with disabilities face **higher rates of violence** and additional **barriers**, making targeted provisions essential for their safety and protection.
- The Directive is a step towards **combating gender-based violence**, but without specific inclusion of women and girls with disabilities, they risk being excluded from vital protections.
- Women and girls with disabilities often face physical and communication barriers to accessing support services. Ensuring **accessibility** in the transposition of the Directive is crucial.
- The Directive provides an opportunity to correct the oversight of excluding women and girls with disabilities from **mainstream gender-based violence policies**.
- Including women and girls with disabilities would strengthen the EU's human rights obligations and align with CRPD.
- With growing awareness, OPDs are well-positioned to advocate for these provisions while the Directive is still being transposed in many member states.

Engaging with national governments

OPDs play a crucial role in advocating for the transposition of the Directive with their national governments. Collaboration with key governmental bodies and national policy makers, such as ministries,

Members of the Parliament (MPs), Members of the European Parliaments (MEPs), as well as national human rights institutions and other likeminded allies (e.g. women organisations) can significantly impact the successful implementation of the Directive. The following advice outlines key steps that OPDs can take to effectively engage with national authorities.

- **Identify** the relevant ministries involved in transposition and contact them as soon as possible. Ministries are already preparing for/started transposing it. If you don't know who oversees this work, you can ask:
 - Your Minister in charge of gender equality and women's rights, as well as other ministries that cover different domains of the Directive such as justice, health, youth, etc;
 - Your Minister in charge of disability rights;
 - Your CRPD focal point;
 - Your Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) focal point;
 - EDF Secretariat and/or your national representation organisation on women's rights can try to help identify relevant national contacts.
- **Write** to the responsible ministry or ministries and request a meeting to set out your position and offer your advice. At the same time, you can also reach out to the CRPD and CEDAW focal points. The dialogue with national authorities is more effective when part of a large coalition that agrees with a common strategy before meeting with government representatives. You should request to be part of any working group created by your government for the transposition of the Directive. You must request that any meetings on the transposition be made accessible to representative of the disability movement, including for example accessible venue, easy to understand information, sign language interpretation, etc. Remind your government that women

with disabilities are not an heterogeneous group and that different women with disabilities face different issues.

- **Remind** government representatives of their obligations to take measures to ensure the full and equal enjoyment by women and girls with disabilities of all human rights and fundamental freedoms under the CRPD, as well as under the CEDAW and Istanbul Convention. The Directive should be transposed also in line with the obligations of your country under these other international conventions. The CRPD and the CEDAW have been ratified by all EU member states. Bulgaria, Czechia, Hungary, Lithuania and Slovakia have not [ratified the Istanbul Convention](#).
- During meetings, as well as during your advocacy and correspondence with the national government, **refer** to relevant national gender equality and women's rights legislations, by highlighting the gaps in light of the Directive.
- In order to engage in effective meetings, prepare a short **analysis of your country current legislation, emphasizing gaps for women and girls with disabilities**. This can serve as a background for you to propose concrete amendments/advocacy points to the government representatives and to MPs.
- **Be prepared** to demonstrate the benefits of more ambitious provisions for women in all their diversity, for example regarding the criminalisation of rape (based on lack of consent), forced sterilisation and abortion, and sexual harassment or by promoting inclusive data collection, disaggregated by disability, and research (article 44).
- **Contact** Members of your national parliament (MPs) who have an interest in women's rights, disability and gender equality. They may be able to help you to put pressure on the government to ensure an effective transposition of the Directive.

- **Contact** your Members of the European Parliament (MEPs), who you think can be supportive as well. [Find their contact details](#).
- **Work together with other stakeholders – think of contacting:**
 - Your [National Human Rights Institutions \(NHRIs\)](#), public bodies whose role is to protect and promote human rights at the national level. They address the full range of human rights topics, including on disability rights and human rights in business.
 - Your national [equality body](#). Many equality bodies are mandated to protect women and girls in all their diversity. They are also referred in article 22 of the directive.⁶
 - Your national organisations of [women's rights](#) and [working on violence against women](#).

Challenges in transposition

There may be challenges in the transposition of the Directive regarding the inclusion of women and girls with disabilities. One major barrier is the **lack of tailored protections for women and girls with disabilities facing violence**. Many provisions of the Directive do not adequately address the specific requirements of women and girls with disabilities, such as accessible support services, shelters, or legal processes and services, which leaves women and girls with disabilities without proper avenues for assistance or protection. Because the directive is not specific

⁶ [Equality bodies](#) are bodies mandated to promote, analyse, monitor and support equal treatment in the national context. These bodies may form part of agencies with responsibilities at the national level for defending human rights or safeguarding individual rights. Article 22 of the Directive refers to the responsibility of member states to designate one or more equality bodies, as well as making the necessary arrangements for equality bodies to perform their tasks, including publishing reports and making recommendations on any issue relating to violence against women and domestic violence, in consultation with civil society organisations.

enough, you will have an important role to explain to the government what needs to be done for women and girls with disabilities.

Another critical issue is the **absence of OPDs as key stakeholders in the transposition of the Directive**, which can hinder the effective implementation and monitoring of measures that could protect women and girls with disabilities. Without the inclusion of OPDs, the experiences, rights and requirements of women and girls with disabilities may not be adequately represented, making the transposition process less comprehensive and potentially leaving gaps in protection and support.

Part 2 – Advocacy to combat violence against women and girls with disabilities

Key areas for advocacy

This chapter outlines key areas of advocacy for OPDs to ensure that national laws and policies reflect an intersectional, human rights-based approach, providing protection and support for all women and girls with disabilities victims of violence.

- **Aggravating circumstances** (article 11): ensure disability is well included in the list of aggravating circumstances in national law; and that on the contrary, more lenient penalties based on the disability of the victims are fully repealed.⁷
- **Individual assessment of protection and support needs** (articles 16 and 17): ensure national law requires an individual assessment which includes a throughout intersectional, human rights-based and disability approach.

⁷ Organisations can also call for the inclusion of specific safeguards addressing the risks faced by women with disabilities in psychiatric and residential institutions. They can call for rape or other forms of sexual violence committed by medical, administrative, or care staff within such institutions to be explicitly recognised as an aggravating circumstance. This reflects the increased vulnerability of institutionalised persons with disabilities and the particular duty of trust and care held by those in positions of authority.

- **Specialist support services** (articles 25 to 33): ensure that national law mandates fully accessible shelters, helplines, and reporting mechanisms for women with disabilities.
- **Helplines for victims** (article 29): advocate for helplines to be fully accessible for women with disabilities, including through measures such support and services in different languages, easy-to-read, and also the use of national sign languages and interpretation.
- **Preventive measures** (article 34): ensure victims experiencing intersectional discrimination are fully included in national preventive measures, in particular the most marginalised women and girls with disabilities (e.g. living in institutions).
- **Awareness and training for professionals** (article 36): push for mandatory disability sensitivity training for those working in contact with victims.
- **Coordinated policy and national actions plans** (articles 38, 39 and 41): advocate for the mainstreaming of disability and consultation with OPDs. Member states have until **14 June 2029** to “adopt, (...) national action plans for preventing and combating gender-based violence” (article 39). This is a key moment to ensure the inclusion of women with disabilities in the national action plan.

Filling the gaps

While the Directive offers significant progress, there are several areas that remain unaddressed or underdeveloped within the text. These gaps present important opportunities for national-level advocacy led by OPDs to ensure that the protection of women and girls with disabilities is effective and inclusive.

The Directive does not specifically address all forms of violence that disproportionately affect women and girls with disabilities, including offences such as forced sterilisation, forced abortion, and sexual harassment. These are critical human rights violations that require

immediate attention in national legal and policy frameworks. Below are key areas where improvements can be made at the national level:

- **Rape based on lack of consent:** While rape is generally criminalised [across the EU](#), it is vital to ensure that national laws define rape based on the lack of consent (“only yes means yes”) rather than other criteria, such as violence or incapacity to resist the aggression. National laws must ensure that consent is given as an active, voluntary, free and informed agreement, and that the absence of consent is recognised as a valid criterion for prosecuting sexual violence. As for all women, it is particularly important for women with disabilities. Rape defined by the use of violence or the resistance of the victims, as well as based on “no means no” approach (instead of “only yes means yes”) leads to more women with disabilities not being recognised as victims of rape, including when they live in segregated settings such as in psychiatry and residential institutions.⁸⁹

Note that article 35 of the Directive focuses on preventing rape and emphasizing the central role of consent in sexual relationships. It mandates that member states promote changes in gender-based power dynamics and stereotypes, ensuring that consent is freely given and respected. The article also refers to the necessity for member states to implement awareness campaigns and consent education materials on a regular basis, in collaboration with civil society, particularly women's organisations. It is of extreme importance that member states include women with disabilities and the disability perspective in awareness raising campaign and programmes, as well as consent education materials.

⁸ [European Disability Forum \(EDF\), position paper on "Sexual and reproductive health and rights of women and girls with disabilities" \(2019\)](#)

⁹ [Inclusion Europe, "Life after violence: Violence against women with intellectual disabilities in institutions" \(2018\)](#)

- **Forced sterilisation and forced abortion:** In many European countries, women and girls with disabilities are still subjected to sterilisation and abortion without their direct free and informed consent¹⁰. These practices often occur under the guise of "protecting" women and girls with disabilities, but they violate fundamental human rights. OPDs can advocate for national laws that unequivocally prohibit forced sterilisation and forced abortion and provide a clear legal framework for protecting the sexual and reproductive rights of women and girls with disabilities, including reparations to the victims of forced sterilisation. This is an obligation they have under the CRPD, CEDAW and Istanbul Convention.
- **Sexual harassment:** The issue of sexual harassment is often overlooked in the context of disability, despite the fact that women and girls with disabilities are more at-risk of sexual harassment in both public and private spaces¹¹. National laws should explicitly include provisions that recognise the heightened risk of sexual harassment faced by women and girls with disabilities, ensuring that harassment is properly addressed by all relevant policies and legislations.
- **Data disaggregation:** Article 44 of the Directive emphasises the importance of collecting data to understand the scope of violence against women and girls. However, the Directive does not specifically mandate the collection of disaggregated data by disability status, which is a critical omission. Without inclusive and disaggregated data, it is difficult to assess the full extent of violence faced by women and girls with disabilities and to implement targeted interventions.

¹⁰ [European Disability Forum, Forced Sterilisation in the European Union](#)

¹¹ [UN Women, "Sexual harassment against women with disabilities in the world of work and on campus" \(2020\)](#)

On the collection of disaggregated data and research, national governments should be urged to:

- **Implement inclusive data collection:** It is essential for national statistics and data collection systems to include disability as a disaggregated category to properly assess the prevalence of violence experienced by women and girls with disabilities. This can include data on domestic violence, sexual violence, harassment, and other forms of abuse. Data collection systems should be accessible to persons with disabilities, ensuring that they can participate in surveys and reporting mechanisms in a way that reflects their lived experiences.
- **Conduct disability-specific research:** National research on violence against women and girls must include a focus on the intersection of disability and gender-based violence. This research should include barriers to accessing services and justice and provide evidence for developing tailored interventions. OPDs can advocate for funding for research that specifically looks at disability-inclusion seeking to understand the systemic barriers that prevent full participation in violence prevention and response efforts.
- **Establish monitoring mechanisms:** Governments should be encouraged to develop systems for monitoring the implementation of the Directive, including tracking progress on data collection and research initiatives. Such mechanisms would allow for the continuous assessment of how well national policies are addressing the rights and requirements of women and girls with disabilities, and where improvements can be made.

Advocacy strategies for OPDs

OPDs can explore different advocacy strategies to strive for a positive transposition of the Directive. Below are some examples:

Building coalitions: partner with women's rights organisations, services for victims of gender-based violence, victims' rights organisations, and other civil society actors to strengthen advocacy efforts. This can be done by:

- **Identifying shared objectives:** Focus on common goals, such as ending violence against women, advancing gender equality, and ensuring accessibility and inclusion of women and girls with disabilities in all their diversity. This common ground can help foster strong partnerships.
- **Coordinating joint advocacy campaigns:** Plan coordinated campaigns that highlight the intersection of violence against women and girls with disabilities. Joint efforts can attract more attention and mobilise resources for stronger impact.
- **Leveraging resources and networks:** By working together, OPDs and women's rights organisations can share resources, expertise, and networks. This may include access to legal experts, media contacts, etc. This is key to bridge the gap between the disability and the feminist movements.
- **Mutual support and solidarity:** Show solidarity through networks and coalitions of civil society organisations, public statements, joint reports, or events. This builds trust and demonstrates a united front for both women's rights and disability rights.

Engaging with national governments and authorities: tips for influencing policymakers, including preparing position papers, arranging meetings, and participating in consultations. Some ideas below:

- **Develop clear, evidence-based position papers and documents:** A well-researched position paper can provide policymakers with clear, data-driven arguments about women and girls with disabilities victims of violence. It should address both the rights and requirements of women and girls with disabilities, as well as the gaps in existing laws and policies.

- **Engage with the bodies responsible for coordinating, implementing, monitoring and evaluating policies and measures:** Article 38 of the Directive mandates member states to designate one or more official bodies responsible for coordinating, implementing, monitoring and evaluating policies and measures to prevent and combat all forms of violence covered under the Directive. When the coordinating bodies are defined, it is crucial to start engaging with them.
- **Arrange strategic meetings with key stakeholders:** Identify key government officials or committees responsible for transposing and implementing the Directive. Schedule meetings to discuss concerns, share evidence, and propose actionable solutions.
- **Participate in public consultations and parliamentary sessions:** Actively take part in national consultations, hearings, and legislative processes. Submit formal responses to consultations and provide oral testimonies at parliamentary sessions to ensure the voices of women and girls with disabilities are heard.
- **Organise advocacy actions:** Host advocacy events where OPDs meet with policy makers, present issues directly, and demonstrate the need for a human rights and disability-inclusive approach to combating violence against women.

Leveraging international pressure: use the CRPD, CEDAW and Istanbul Convention to advocate for strong national transposition. This can be done by:

- **Utilising binding international frameworks:** Highlight how national governments are bound by international treaties like the CRPD, CEDAW, and the Istanbul Convention to uphold women's rights, including the rights of women and girls with disabilities.
- **Raising awareness of international monitoring bodies:** Bring attention to the role of international monitoring committees such as the CRPD Committee, the CEDAW Committee and the GREVIO.

These bodies regularly review countries' compliance with international treaties and can apply pressure on governments.

- **Submitting shadow reports:** Work with international/national human rights organisations, as well as with other OPDs and women's rights organisations to submit shadow reports to the relevant international bodies (e.g., [CRPD](#), [CEDAW](#), or [GREVIO](#) committees). These reports can highlight gaps in the national transposition of the Directive and urge stronger compliance with international standards.
- **Mobilising international advocacy networks:** Collaborate with global and European networks such as EDF, the [European Women's Lobby](#), and [Women Against Violence Europe](#), to amplify your advocacy efforts. International coalitions can help increase pressure on national governments.

Public campaigns and awareness-raising: ideas for launching public awareness campaigns on the intersection of disability and violence against women. For example, by:

- **Creating inclusive campaigns:** Ensure campaigns are fully accessible to persons with disabilities in all their diversity. This includes providing materials in accessible formats such as braille, sign language interpretation, and easy-to-read versions. Don't forget to bring men on board too!
- **Using personal stories:** Highlight the lived experiences of women and girls with disabilities who have survived violence, ensuring that their stories are shared in a way that respects their dignity while raising awareness of the specific challenges they face.
- **Collaborating with celebrities and influencers:** Engage public figures, including activists with disabilities, to raise awareness. Their platforms can help bring the issue into the public eye and make it part of mainstream discourse.

- **Engaging in digital campaigns:** Use social media platforms, blogs, and websites to create digital campaigns.
- **Hosting events or webinars:** Organise public events, webinars, or conferences to discuss the intersection of violence against women and disability, inviting policymakers, media representatives, and activists to share insights and experiences.

Media engagement: approaches to working with the media to bring attention to the issue. This can be done by:

- **Writing public statements, opinions, and letters:** Write and disseminate public statements, opinions, letters and other material that outline the challenges faced by women and girls with disabilities experiencing violence. Ensure that these materials are media-friendly and highlight the urgency of transposing the Directive in a way that is inclusive for women in all their diversity.
- **Building relationships with journalists:** Foster relationships with journalists who cover issues related to gender-based violence, disability rights, women's rights and human rights. Provide them with key facts, statistics, and personal stories that highlight the intersection of these issues. This could lead to investigations into violence against women with disabilities, bringing more awareness on the issue.
- **Conducting media training:** Train your OPD representatives in effective media engagement techniques, including how to speak confidently with journalists, respond to media inquiries, and manage public relations.
- **Leveraging traditional and social media:** Engage both traditional media outlets (e.g., TV, radio, newspapers) and social media platforms (e.g., Bluesky, Facebook, Instagram) to reach different audiences. Social media can amplify messages quickly, while traditional media may provide more in-depth coverage.

- **Organising press conferences or media briefings:** Host press conferences or briefings where OPDs and women's rights organisations present their advocacy messages. This can attract media coverage and create opportunities to directly influence public opinion and policymakers. This is particularly important close to when key decisions on the transposition of the directive are being made, for example when a new law is being proposed by the government or voted by the parliament.

Conclusions

The transposition of the Directive represents a crucial opportunity to improve the protection of the rights of women and girls with disabilities. While the Directive sets a foundation for addressing gender-based violence, it is clear that further efforts are needed to ensure that women and girls with disabilities are fully included in national laws and policies.

OPDs and their allies play an essential role in advocating for more comprehensive protections, such as ensuring the criminalisation of violence based on lack of consent, advocating for the ban of forced sterilisation, and enhancing access to services. Furthermore, the collection of disaggregated data and disability-specific research are key to developing targeted, effective solutions.

It is important that OPDs and their allies take immediate action to ensure that their voices are heard in the transposition process. The window for influence is limited, and now is the time to engage with national governments, build coalitions, and advocate for stronger legal frameworks. Start by identifying the relevant ministries, setting up meetings, and sharing key recommendations based on the rights and requirements of women and girls with disabilities. Collaborate with other civil society organisations, engage with the media to raise awareness, and use international human rights frameworks.

By building strong coalitions, engaging with national governments, and leveraging international frameworks, OPDs and their allies can drive the necessary changes that ensure the safety, dignity, and equality of women and girls with disabilities. The transposition process is an opportunity to turn the vision of an inclusive, accessible, and progressive legal framework into reality for all.

Take action now to make sure that no one is left behind!

Annexes

Annex 1 - Letter Template

You can use the letter template at the national level to engage policymakers during the transposition process. Please see the next page for details.

(Organisation's name and details)

(Recipient's name and details)

Dear (Recipient's name),

Subject: Advocating for disability inclusion in the transposition of the EU Directive on violence against women and domestic violence

We, (OPDs name/organisation name), are writing to you as part of a coalition of organisations committed to the protection and promotion of the rights of women and girls with disabilities, and as members of the European Disability Forum (EDF). The transposition of the [EU Directive on Violence against Women and Domestic Violence](#) (Directive) into national law represents a crucial opportunity to ensure that the rights and requirements of women and girls with disabilities are fully included.

While we appreciate the progress made by the Directive, there are several areas where specific provisions for women and girls with disabilities remain insufficient or absent. Therefore, we call upon you to ensure that the following **key demands** are included in the national transposition process:

1. Ensuring disability is addressed in aggravating circumstances (article 11)

We urge that national laws explicitly include disability as an aggravating circumstance in cases of violence against women and girls. Furthermore, we call for the immediate repeal of any provisions that allow for more lenient penalties based on the disability of the victim. Disability should never be a factor that leads to reduced penalties for perpetrators of violence.

2. Guaranteeing individual assessments of protection and support needs (articles 16 and 17)

We emphasize the importance of ensuring that national laws require an

individual assessment of the protection and support needs of women and girls with disabilities. This assessment must be conducted through an intersectional, human rights-based approach that prioritises disability, ensuring that the barriers faced by women and girls with disabilities are identified and addressed appropriately.

3. Mandating accessible support services (articles 25 to 33)

It is essential that national laws mandate the establishment of fully accessible and inclusive shelters, helplines, and reporting mechanisms for women and girls with disabilities. These services must be designed to meet the specific requirements of women and girls with disabilities, ensuring equal access to safety and justice for all women.

4. Including OPDs voices in coordinating bodies and national action plans (articles 38, 39, 41)

We urge that the coordinating bodies designated under article 38 and the national action plans described under article 39 are inclusive of OPDs. This means that OPDs are consulted, and they actively cooperate with member states' coordinating bodies and meaningfully participate in the design, implementation and monitoring of the national action plans.

(Depending on your national law and context you can add the following section) We also urge your office to address the following **critical gaps** that remain unaddressed by the Directive:

- **Rape based on lack of consent:** National laws should ensure that rape is defined based on the lack of consent, rather than physical resistance, which is particularly important for women and girls with disabilities who may face barriers in expressing consent.
- **Prohibition of forced sterilisation and forced abortion:** We call for the unequivocal prohibition of forced sterilisation and abortion, practices that continue to violate the sexual and reproductive rights of women and girls with disabilities in many EU member states (You can include specific information on your national contexts).

- **Addressing sexual harassment:** National laws must recognise the increased risk of sexual harassment faced by women and girls with disabilities, ensuring that such violence is adequately addressed in both legal and institutional frameworks.
- **Inclusive data collection and research:** We urge national governments to implement inclusive data collection systems that disaggregate data by disability and gender. Additionally, research on violence against women and girls must focus on the intersection of disability and gender-based violence to better inform tailored interventions.

These demands are vital to ensure the transposition of the Directive is fully inclusive of the rights and requirements of women and girls with disabilities. They are also necessary to comply with the obligations established by the UN Convention on the Rights of Persons with Disabilities, the UN Convention on the Elimination of All Forms of Discrimination Against Women, and [if ratified by your country] the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).

We stand ready to engage in dialogue with policy makers and other relevant stakeholders to ensure that national laws reflect these priorities.

Thank you for your attention to this critical issue. We look forward to your support and the opportunity to collaborate in advancing the rights of women and girls with disabilities.

Sincerely,

(Your organisation's name and details)

Annex 2 - Resources for further support

- [European Disability Forum, Forced sterilisation in the European Union](#)
- [European Disability Forum, Position paper on gender stereotypes against women and girls with disabilities \(2025\)](#)
- [European Disability Forum, Combating violence against women with disabilities - A guide on GREVIO \(2024\)](#)
- [European Disability Forum, Gender mainstreaming toolkit \(2024\)](#)
- [European Disability Forum, Third Manifesto on the rights of women and girls with disabilities \(2024\)](#)
- [European Disability Forum, Guide on the United Nations Committee on Elimination of Discrimination Against Women \(CEDAW\) \(2023\)](#)
- [European Disability Forum, Report on forced sterilisation in the European Union \(2022\)](#)
- [European Disability Forum, Position paper on Violence against women and girls with disabilities in the European Union \(2021\)](#)
- [European Commission, DG Employment, Social Affairs and Inclusion](#)
- [European Commission, DG Justice and Consumers](#)
- [European Institute for Gender Equality](#)
- [European Network of Equality Bodies](#)
- [European Network of National Human Rights Institutions \(ENNHRI\)](#)
- [European Union of the Deaf, Gender Equality Report: "Combating Gender-based Violence and Discrimination against Deaf Women and Girls in the EU" \(2024\)](#)
- [United Nations Convention on the Rights of Persons with Disabilities \(UN CRPD\)](#)
- [Committee on the Elimination of Violence Against Women \(CEDAW\)](#)
- [Istanbul Convention](#)

Document credits

This guidance was prepared by Giulia Traversi, EDF Women's rights Officer. It was reviewed by the EDF Women's Committee and Marine Uldry, EDF Human Rights Policy Coordinator.



The European Disability Forum

Mundo Madou

Avenue des Arts 7-8

1210 Brussels, Belgium.

www.edf-fehp.org

info@edf-fehp.org

Funded by the European Union.

Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Commission. Neither the European Union nor the granting authority can be held responsible for them.



**Funded by the
European Union**