

Autism-Europe's analysis

Of the Concluding Observations on the combined
second and third periodic reports on

The European Union's implementation
of the UN Convention on the Rights
of Persons with Disabilities

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Introduction

The UN Convention on the Rights of Persons with Disabilities (UNCRPD) is the first ever human rights treaty to which the European Union (EU) became a party in its capacity as a supranational organisation. The UNCRPD intends to promote, protect, and ensure the full and equal enjoyment of all human rights and fundamental freedoms by persons with disabilities. It aims to eliminate barriers and discrimination, ensuring that disabled people can participate fully in society.

The Committee on the Rights of Persons with Disabilities (CRPD) is the body of independent experts that monitors the implementation of the Convention by the States parties. The CRPD recently reviewed the EU's implementation of the Convention in March 2025. The resulting recommendations are officially termed 'Concluding Observations'.

In its Concluding Observations, adopted on 18 March, **the CRPD has endorsed Autism-Europe's demands to strengthen actions for the rights of autistic people in the European Union**. Indeed, several of the recommendations echo directly [our alternative report](#) submitted to the United Nations at the beginning of the year to inform the review from the perspective of autistic people and their families.

This report examines the recommendations made by the CRPD, specifically those that are relevant for autistic people. We also highlighted how they align with our alternative report. This way we can see how our advocacy efforts so far have worked and get an overview of how we can use this key document going forward to advocate for autism rights at the EU level and beyond.

This document calls on the EU to, among others:

- **Adopt renewed actions to address the needs of disabled people**, including autistic people in the second phase of the European Strategy for the Rights of Persons with Disabilities
- **Improve access to disability assessment and recognition for autistic people**
- **Combat poverty and social exclusion** experienced by autistic people,
- **Promote compulsory training of professionals on autism** and fostering **quality support services** in the community
- Enhance **access to employment**
- **Abolish forced treatment** and promote supported decision-making.

Explicit reference to Parliament Resolution on Harmonising the Rights of Autistic Persons

The CRPD highlighted [the European Parliament Resolution on Harmonising the Rights of Autistic Persons](#), adopted in 2023. The Resolution brings into focus the many challenges faced by autistic people and their families and constitutes a strong call for action.

General Principles and Obligations (arts. 1–4)

The CRPD underlined the persistence of the medical model of disability and the lack of harmonisation about disability assessments across member states. It recommends such harmonisation, including with respect to recognition of disability status. This reinforces the 2023 European Parliament Resolution which states that *“the lack of mutual recognition of disability status and of the autism diagnosis between Member States creates barriers for autistic persons and their families to fully exercising their right to freedom of movement within the EU”* (recital M) and further calls for a European legal status for persons with disabilities to allow for mutual recognition across member states.

The Committee expressed concern that the first phase of the Disability Rights Strategy (2021-2030) concluded in 2024 without concrete plans for the future. It also underlined the fact that it included only limited actions for autistic persons. Autism-Europe has been consistently calling for some specific actions to address the needs of the autistic community in full consultation with autistic people and their representative organisations. This demand was acknowledged in the UN recommendations, which call on the EU to consult autistic persons and other disability organisations in the design of future actions.

Equality and non-discrimination (art. 5)

Autism-Europe has long called for the adoption of a comprehensive anti-discrimination legislation protecting disabled people outside the realms of employment at EU level. The CRPD also urged the EU to revive efforts to adopt the Equal Treatment Directive and extend protections to areas such as health care, education, and access to goods and services. Our alternative report had specifically highlighted how autistic people are disproportionately affected by this legislative gap, especially those with higher support needs.

Women with Disabilities (art. 6)

The Concluding Observations of the Committee echo our core concerns, particularly highlighting the insufficient protection of the rights of women with disabilities in key EU strategies. Specifically, the Committee criticised the lack of targeted focus on the rights of women with disabilities in the EU Gender Equality Strategy 2020–2025 and the Disability Rights Strategy 2021–2030, an issue that Autism-Europe has long raised with regard to autistic women. Autism-Europe advocates for cohesion across these

initiatives which takes into account the intersecting discriminations faced by disabled women, particularly barriers faced by autistic women such as stigma in diagnosis criteria and institutionalization.

It also noted the failure of the Gender Action Plan III to systematically address intersectional and multiple discrimination, and the inconsistent integration of the voices of women and girls with disabilities in policymaking processes. Furthermore, the absence of disaggregated data on the participation of women with disabilities in decision-making roles and on intersectionality in EU external actions reinforces the invisibility of autistic women in both policy and practice.

Children with disabilities (art. 7)

The CRPD expressed concern over the continued institutionalisation and lack of disaggregated data for children with disabilities, including autistic children. We had stressed in our report that autistic children are often placed in segregated settings or institutions, denied early intervention, and excluded from policymaking processes.

The UN's call for stronger data collection and a firm commitment to deinstitutionalisation reflects our push for autism specific measures in the EU's Child Guarantee and other instruments.

Awareness-Raising (art. 8)

The CRPD is concerned about stigma, ableist attitudes, and harmful stereotypes against persons with disabilities, including autistic persons. It is also concerned about discriminatory eugenic attitudes in prenatal medical diagnosis affecting autistic individuals. In our alternative report, we emphasised that autism continues to be medicalised and misunderstood. We called for a pan-European awareness campaign co-developed with autistic people to challenge stereotypes and promote a human-rights based understanding of autism. The Committee joined our call for a comprehensive and well-funded strategy to raise awareness about the rights and dignity of disabled persons and notably autistic persons, involving their representative organisations in the process aligns with our proposal.

Right to life (art. 10)

The CRPD expressed concern about the disproportionate mortality rates among persons with disabilities during the COVID-19 pandemic, including in institutions. Autism-Europe had highlighted how autistic people have experienced discrimination in triage protocols for life-saving treatment. They also faced neglect and isolation in institutional settings due to their communication differences. We had demanded that the EU ensure non-discriminatory access to healthcare and develop clear, inclusive protocols for emergency situations. Such changes being integral to addressing the reduced life expectancy of autistic people The Committee's recommendation for equal access to life-saving treatments confirms these demands.

Equal recognition before the law (art. 12)

The CRPD raised alarm over the lack of action to remove guardianship regimes and restrictions on legal capacity for persons with disabilities in Member States. It recommends that the EU call on Member States to replace substitute decision making regimes with supported decision-making systems that respect the will and preferences of persons with disabilities, and provide training on supported decision

making to public officials, families, and service providers. Our report had specifically detailed how autistic people are often denied legal capacity and placed under substituted decision making systems. We advocated for supported decision making frameworks with appropriate communication supports and related training for professionals.

Liberty and Security of the Person (art. 14)

The CRPD condemned involuntary detention of autistic people and called on the EU to fund research into community-based services. In our alternative report, we detailed how autistic people are disproportionately detained in psychiatric facilities, often due to a lack of appropriate community support. The Committee's recommendation to abolish involuntary detention aligns with our call for investment in rights based, community based alternatives.

Freedom from Torture or Cruel, Inhuman or Degrading Treatment or Punishment (art. 15)

The CRPD is concerned about the forced treatment of autistic children in institutions across Member States, including the use of physical and pharmacological restraints, solitary confinement, forced electro-convulsive therapy, and other coercive practices. We documented harmful practices such as physical restraints, forced medication, and electroconvulsive therapy in institutions. The Committee has urged the EU to adopt an absolute ban on forced psychiatric interventions, especially of children and ensure that all treatment is based on free and informed consent. This is a strong endorsement of our position.

Liberty of Movement and Nationality (art. 18)

The Committee acknowledged the barriers that autistic persons face in accessing assessment procedures for disability recognition when relocating between Member States. Autism-Europe highlighted that the legislation underpinning the Disability Card focuses on short stays. This results in maintaining barriers for persons with disabilities when accessing social security benefits as they move between different member states. Thereby limiting the Disability Card's effectiveness in addressing the needs of those relocating to a different EU country for a longer period of time. We also highlighted that autistic people face additional barriers to access the Card due to lack of adequate disability recognition for invisible disabilities such as autism. . The committee recommends that the EU ensure that disability assessment procedures are accessible to autistic people and align with the human rights model of disability and support the right to freedom of movement. The committee also called for the scope of the disability card to be extended to long term relocations, ensure portability of social security benefits and provide for mutual recognition of disability status. This fully reinforces our calls to ensure liberty of movement of autistic person within the EU.

Living independently and being included in the community (art.19)

The CRPD strongly reaffirms our critical concerns regarding the lack of effective EU actions to ensure that autistic people, particularly those with high support needs, can live independently and be included in the community. The committee highlighted with concern the continued use of EU funds to perpetuate institutionalisation rather than support for community-based services. The inadequacy of safeguards and

ineffective monitoring systems within EU funding systems was raised as the cause for this misuse of structural funds.

The committee called for the amendment of the Commission Guidance on Independent living to align with General Comment No. 5, and for institutionalisation to be recognised as a form of discrimination. It also underlined the urgent need to prioritize community-based supports such as personal assistance, affordable housing, and individualised services, areas where autistic people and their families continue to face substantial barriers.

Education (art. 24)

The CRPD criticised the ongoing segregation of children with disabilities and recommended the promotion of inclusive education systems. Our report had highlighted that autistic students are often excluded from mainstream settings due to a lack of trained staff, reasonable accommodations and inflexible curricula. This undermines the rights to access education for autistic people and has long-term impact on their life outcomes. We welcome the Committee's strong stance for quality inclusive education across the EU and the call for qualified teachers and educational support staff, reasonable accommodation, accessible school buildings, revising standardized curricula that fail to meet the diverse needs of students with disabilities, and fighting prejudice.

Health (art. 25)

In its recommendations, the CRPD emphasised the need for accessible health care. Expressing concern over the lack of explicit legal protection against disability-based discrimination in medical settings. We had pointed out significant gaps in the healthcare system, such as professionals lacking autism specific training and the absence of accessible materials. The Committee's call for comprehensive accessibility standards such as requiring Member States to develop Easy Read medical materials, accessible administrative processes, and communication training for healthcare professionals are fully in line with our recommendations.

Habilitation and Rehabilitation (art. 26)

The CRPD urged to "Promote compulsory training on specific and evidence-based habilitation strategies for autism, and adopt quality assessment systems for habilitation services focused on inclusion, participation and users' quality of life".

It aligns fully with our key recommendations to promote training in, and the availability of rights-based, person centred, inclusive, and autism specific habilitation services across member states, as well as their related quality assessment system.

Work and Employment (art. 27)

The CRPD is concerned that discrimination against persons with disabilities, including autistic people, remains pervasive in work and employment. This includes lower wages, part time or low paid jobs, and lower participation in full time employment. This particularly affects women with disabilities and those with intensive support needs.

Our alternative report highlighted that autistic people are often relegated to low-paid, part-time work or excluded from employment entirely. Indeed, the estimated rate of unemployment is one of the highest in Europe, standing at up to 90%, far higher than the general population, and even higher than for other people with disabilities. Therefore we support the CRPD's call for combatting discrimination against persons with disabilities in employment.

Adequate Standard of Living and Social Protection (art. 28)

The CRPD echoed our concern about poverty and social exclusion among autistic persons. We had emphasised the structural barriers that push autistic people into poverty. Such barriers include the lack of access to employment, and higher services expenditure. Unaffordable or non-existent support systems also leave families to act as informal carers. Therefore the cost of raising an autistic child is tends to be significantly higher than for other non-disabled children. Indeed, families often have to cover the costs of private autism-specific services. Households tend to experience a loss of income due to caring responsibilities because of a lack of adequate support services. The cost of disability is a basis for poverty across the EU. The recommendation to earmark EU funds to tackle poverty among disabled people is a vital outcome.

Conclusions

This document represents the recommendations of the EU by the CRPD. It is an important assessment, evaluating the European Union's commitment to disability rights in the context of the implementation of the UN Convention. Autism-Europe welcomes the fact that the Concluding Observations endorsed several of our key demands and underlined a number of challenges experienced by autistic people.

Crucially the Concluding Observations tell the EU exactly where and how they need to improve and take further action. Autism-Europe will use this official document to continue advocating for these essential changes, cooperating closely with the European Union and all relevant stakeholders, and our autism community to promote their implementation.

Read the full recommendations here:

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FEUR%2FCO%2F2-3&Lang=en