



# Autism-Europe's response to the public consultation on Enhancing the Strategy for the Rights of Persons with Disabilities up to 2030

## Introduction

Autism-Europe welcomes the opportunity to contribute to the consultation on the next phase of the Strategy for the Rights of Persons with Disabilities 2021-2030. The first phase of the Strategy has featured significant developments, including the European Disability card and Parking card legislation and the establishment of the AccessibleEU Centre. These achievements, along with the lessons drawn from the first years of implementation and the results of the second review of the European Union (EU) by the United Nations Committee on the Rights of Persons with Disabilities (UN CRPD Committee) provide a robust foundation for an ambitious, inclusive and targeted action plan for the remainder of the for 2025–2030.

In the meantime, the recent UN CRPD [Concluding observations](#) on the combined 2nd and 3rd periodic reports of the EU<sup>1</sup>, officially published in April 2025, make multiple references to autism. They recommend targeted measures in the next phase of the Strategy for the Rights of Persons with Disabilities to combat the discrimination autistic people continue to face. It constitutes a strong endorsement of Autism-Europe's requests to strengthen actions for the rights of autistic people in the European Union and ensure their needs are addressed in policy design. The UN CRPD recommendations also mention the [European Parliament Resolution on Harmonising the Rights of Autistic People](#) adopted in October 2023<sup>2</sup>.

Available data show that autistic people face very high level of discrimination in all aspects of life, from lack of access to education to high level of unemployment and lack of access to healthcare. It has been evidenced that autistic people die on average 16 years younger than the general population. A holistic approach and some targeted actions are needed to tackle the many challenges they face in their everyday life.

Enabling autistic people to live long and fulfilling lives as autonomously and independently as possible, requires a change of mind-set in society to support their active participation and inclusion. It also entails to create and maintain the necessary support services and to foster accessibility for autism across all sectors.

Autism-Europe's priorities focus on strengthening awareness-raising and training, enhancing community-based support and independent living, improving freedom of movement and mutual recognition, advancing inclusive education and employment, mainstreaming cognitive, sensory and communication accessibility and ensuring coproduction with the disability community and transparency across the Strategy's implementation.

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<sup>1</sup> Concluding observations on the combined second and third periodic reports of the European Union, Committee on the Rights of Persons with Disabilities, 2025

<sup>2</sup> European Parliament resolution of 4 October 2023 on harmonising the rights of autistic persons (2023/2728(RSP))

## 1. Strengthening awareness-raising, training and public understanding of autism

### 1.1 Combating misinformation and disinformation

To address the widespread stigma and misconceptions about autistic people that undermine their inclusion in society, the next phase of the Strategy should adopt a comprehensive, well-funded, pan-European awareness-raising initiative that promotes acceptance and disseminates accurate, evidence-based information about autism. Such a campaign should be co-designed with disabled persons' organisations, and those representing autistic people, and should aim to challenge harmful stereotypes and discriminatory attitudes. It should also address the specific challenges autistic people face in accessing healthcare, education, employment, digital environments and public services, as was called for by both the European parliament and the CRPD committee.

### 1.2. Training of professionals

Across the EU, professionals in key sectors often lack sufficient training on autism and disability rights which in part explains the lack of access experienced by autistic people<sup>3</sup>. This is the case both in mainstream and autism-specific services and it negatively affect the quality and accessibility of education, healthcare, employment services, justice systems and public administration, and overall participation in society.

Addressing these gaps requires a dual approach. First, all professionals working in mainstream services must receive compulsory training on autism and disability rights as part of initial education and ongoing professional development. Such training should enable professionals to understand autism, including from a rights-based perspective, and to provide reasonable accommodation, accessible communication and inclusive support across all sectors.

Second, in line with the UN CRPD Committee's concluding observations, there is a need for specific and compulsory training on evidence-based, autism-specific habilitation strategies for professionals delivering specialised services. The CRPD Committee has explicitly called for the promotion of such training and for the adoption of quality assessment systems for habilitation services focused on inclusion, participation and users' quality of life. This reinforces Autism-Europe's long-standing calls to promote the availability of rights-based, person-centred, inclusive and autism-specific habilitation services across Member States.

All training programmes, whether aimed at mainstream professionals or those providing specialised autism services, should be grounded in person-centred and in line with international human rights standards. The content of such training must be co-designed with autistic people and those who support them as well as their representative organisations. In addition, the

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<sup>3</sup> Binte Mohd Ikhsan, S.N., Holt, R., Man, J. *et al.* Access to services for autistic people across Europe. *Molecular Autism* **16**, 35 (2025). <https://doi.org/10.1186/s13229-025-00664-2>

European Union should encourage Member States to establish quality frameworks for autism-specific supports that prioritise inclusion, self-determination and quality of life, particularly as part of broader efforts to promote deinstitutionalisation.

EU funding programmes, including ESF+, ERDF, Erasmus+ and Horizon Europe, should be actively used to support the development, delivery and dissemination of both mainstream and autism-specific training initiatives, ensuring consistency, sustainability and meaningful impact across the EU.

### **1.3. Ensuring co-production in autism research**

Building understanding of autism also requires that the autism community is fully involved in supporting research to improve the quality of life and inclusion of autistic people, and the EU can play a vital role in supporting such research. Autistic people and their families should be involved in setting the research agenda and deciding on funding allocation. For this purpose it is essential to establish a dedicated and structured participatory process, to identify priorities and guide EU funding for autism research.

Autism-Europe stresses the importance of research on autism to uphold strong ethical standards. The European Commission and the Member States must promote research co-produced with autistic people and their families to ensure it is done according to their interests and needs with the aim of improving autistic people's quality of life. Policy silos should be avoided and autistic people and their representative organisations should have direct and meaningful involvement together with the scientific community in the research do for the plan for a common approach to autism in Europe as foreseen in the mandate of the EU Health commissioner.

## **2. Decent Quality of Life and Independent Living**

### **2.1 Developing community-based services and ending institutionalisation**

Despite the EU's legal and policy commitments to independent living, the number of disabled people living in institutional settings has been steadily increasing over the past 10 years, as evidenced recently by the [Eurofound report](#). Autistic persons with high support needs are among the most likely to end up living in an institution. It is therefore essential to promote autism-specific actions to improve access to community-based services that can adequately support autistic people.

For autistic people, accessibility within community-based services goes far beyond physical access. Many autistic persons face significant barriers related to sensory overload (such as noise, lighting or crowded environments), social overload, a lack of autism-trained personal assistants, and insufficient awareness and understanding of autism among community service

providers. Without adequately addressing these barriers, community-based services risk being inaccessible in practice and may fail to prevent institutionalisation.

The lack of trained, autism-informed support staff and personal assistants can severely limit autistic people's ability to live independently and participate in community life. Similarly, mainstream community services that are not designed or adapted to account for sensory, cognitive and communication differences often exclude autistic people unintentionally. The next phase of the Strategy must therefore ensure that accessibility requirements for community-based services explicitly include sensory, cognitive, social and communication dimensions, alongside investment in training in autism and awareness-raising for service providers at local level.

Autism-Europe calls for promoting the implementation of the [European Union Guidance on Independent Living and Inclusion in the Community for Persons with Disabilities and](#) strongly supports the development of an EU Package on de-institutionalisation. This package must build on the Commissions work so far in ensuring that EU funding mechanisms do not support the building, renovation or maintenance of institutions, including smaller segregating settings.<sup>4</sup> It should also establish clear requirements for the development of high-quality, person-centred, support services within the community that respond to the needs of autistic people.

The EU should reinforce obligations to monitor the use of EU funds and publish the results of these monitoring processes. It should also support Member States to reallocate resources towards independent living, supported housing and personalised support arrangements and notably encourage them – via a Council decision on deinstitutionalisation - to adopt deinstitutionalisation strategies at the national level.

To support such national strategies, Autism-Europe calls on the EU to promote the “*EU Knowledge Exchange in Deinstitutionalisation Practice*”, proposed by the European Expert Group on the transition from institutions to community-based support (EEG), in order to connect those implementing deinstitutionalisation across countries, enable mutual learning, improve practice, and make expertise available to more Member States and deinstitutionalisation practitioners.

The European semester should be used as a monitoring tool to assess progress being made across European regarding deinstitutionalisation. The upcoming Anti-poverty Strategy and Affordable Housing Plan of the European Commission must take a concerted effort to mainstream disability measures in their actions. The affordable housing plan must allocate funding for accessibility. Ensuring that autistic people have access to appropriate community-based supports is crucial for achieving dignity, autonomy and participation in society on an equal basis with others.

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<sup>4</sup> *Guidance on independent living and inclusion in the community of persons with disabilities in the context of EU funding*, C(2024) 7897 final, 20 November 2024. <https://ec.europa.eu/social/BlobServlet?docId=27899&langId=en>

## 2.2 Strengthening supported decision-making

Autistic people across the EU continue to encounter undue restrictions on their legal capacity, often through guardianship and substitute decision-making regimes that are not compliant with the United Nations Conventions for the Rights of Persons with Disabilities (UN CRPD). Although all 27 EU Member States and the EU itself are signatories to the UN CRPD, only 13 Member States have reformed their legal capacity legislation towards a supported decision-making model in line with their obligation under article 12 of the Convention. The next phase of the Strategy should support Member States in transitioning to supported decision-making systems that respect individuals' will and preferences and comply fully with a human-rights-based understanding of legal capacity. This includes providing accessible information, training for families and professionals, and promoting models that enhance autonomy rather than restrict it. Such support to national governments would signify an EU level consensus around the obligation to reform legal capacity legislation.

The most recent report by the European Parliament on the proposal for a Regulation governing the cross-border protection of adults has been a welcome advancement towards respecting the autonomy and dignity of adults in vulnerable cross-border situations, in line with the UN CRPD and the Strategy for the Rights of Persons with Disabilities. Among the amendments in the report is the removal of any guardianship measures and a comprehensive and consistent definition of supported decision-making.<sup>5</sup>

## 2.3 Promote adequate support for informal carers

Autism-Europe supports a rights-based, adequately funded and gender-responsive long-term care framework that recognises both care recipients and informal carers as essential to inclusive societies. To achieve this, funding must be earmarked to properly implement the European Care Strategy during the remaining period of the Strategy on the Rights of Persons with Disabilities. This requires clear references and measurable indicators for long-term care, including for informal carers, within key funding instruments such as the National and Regional Partnership Plans, to prevent care needs from being sidelined by budgetary shifts and to uphold the European Pillar of Social Rights. Autism-Europe also highlights that unpaid care, predominantly carried out by women in families of autistic children, entails significant economic and social costs. Many carers face reduced income and limited labour-market participation due to a lack of accessible services, flexible employment arrangements and respite care. Consequently, Autism-Europe calls for the EU to conduct a study to assess the extent to which informal carers face reduced access to adequate income and pension entitlements later in life. The study should also identify the Member States and regions where informal carers receive the least support and quantify the income losses that occur when State support is lacking.

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<sup>5</sup> European Parliament. REPORT on the proposal for a regulation of the European Parliament and of the Council on jurisdiction, applicable law, recognition and enforcement of measures and cooperation in matters relating to the protection of adults (A-10-2025-0128). European Parliament legislative resolution of 1 July 2025.

[https://www.europarl.europa.eu/doceo/document/A-10-2025-0128\\_EN.html](https://www.europarl.europa.eu/doceo/document/A-10-2025-0128_EN.html)

Therefore, Autism-Europe calls on the EU to continue promoting comprehensive, community-based support systems, increased investment in quality care services and policy reforms that recognise and value informal carers, address structural barriers, and enable autistic people to live independently while protecting carers from social exclusion.

### 3. Freedom of movement and equal recognition across the EU

#### 3.1 Harmonised disability assessment and recognition

Autistic people and their families often struggle to access autism diagnosis services and in turn disability assessment in their home country. It is due to systemic issues such as inordinately long waiting lists reported across Europe, and diagnostic bias against groups such as women and girls or ethnic minorities. Lack of access to disability recognition prevent many autistic individuals from accessing the European Disability Card and from fully exercising their right to free movement. Disability assessment practices also vary considerably across EU Member States. Ensuring that the Disability Card and the EU Parking Card are accessible to autistic people in practice is an essential step in removing these significant barriers to freedom of movement. As a correlate, autistic people frequently encounter barriers to having their disability recognised when they move between member states. These difficulties are compounded by the lack of systematic mutual recognition of autism diagnosis across Europe. This undermines their rights to participate in education, employment and social rights as they are often unable to access reasonable accommodations, learning supports and employment supports as their diagnosis is not recognised in other EU countries.

To address this assessment barrier Autism Europe proposes:

1. The establishment of an EU framework for mutual recognition of Disability status
2. Co-Creating the criteria for this framework with persons with disabilities, the people who support them, and the organisations that represent them.
3. Provide information on transferring welfare benefits in an Easy to Read format.
4. Support member states in developing accessible e governance tools to enable citizens to access important documents when they are in another EU country.
5. The creation of a clear and accessible 'one stop shop' information service on welfare, employment, healthcare and education rights in different EU countries.

Autism-Europe strongly supports the establishment of harmonised EU-level principles for disability assessment and the mutual recognition of disability status, including autism diagnoses, across all EU Member States. As is stressed in the European Parliament 2023 Resolution, removing these barriers to diagnoses and recognition is essential to ensuring freedom of

movement and full participation across the European Union.<sup>6</sup> To achieve this the Strategy should include a Directive for full freedom of movement of people with disabilities.

In addition to these barriers, administrative procedures associated with the transfer of welfare benefits, access to services and recognition of status are often complex and inaccessible. This disproportionately affects autistic people, who face additional barriers linked to cognitive, communication and sensory accessibility. Autism-Europe calls for simplified and user-friendly procedures that integrate Easy-to-Read formats and accessible communication across all stages of the process.

## 4. Equal access to education and employment

### 4.1 Inclusive education

Autistic people frequently encounter accessibility barriers when engaging in the education system, namely stemming from sensory overload, rigid curricula and communication differences. These barriers can be successfully managed if the autistic student is adequately supported and encouraged to reach their goals while in education. However, across the EU there are significant variations in the availability and resourcing of educational support services between regions. At an individual level, insufficient supports can lead to worse educational outcomes. At an EU level this further exasperates interregional disparities which hampers cohesion due to the importance of education in obtaining employment in the open labour market.

Furthermore, autistic people are often excluded from mainstream education programs due to a lack of understanding of autism, poorly resourced schools and inadequate training of educators on how to support their autistic students. This means that many autistic students must go to a special school even if they wish to go to a mainstream school. While supported learning environments tailored towards autistic people can be helpful for some individuals, they should not lead to segregation and prevent a student from attending a mainstream school. Segregation should not be the default option for accessible education for autistic people in Europe.

Inclusion is shaped by the broader classroom environment and the social context of the school as a whole. Classmates and peers play a vital role in fostering inclusion, belonging and participation, while all school staff, including teachers, teaching assistants, management, support staff and extracurricular personnel, must be adequately trained and aware of autism.

Autism-Europe therefore calls for whole-school approaches to inclusion, involving educators, school staff, pupils and families, supported by continuous training and awareness-raising.

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<sup>6</sup> European Parliament. Resolution on harmonising the rights of autistic persons (P9\_TA(2023)0343). European Parliament resolution of 4 October 2023 on harmonising the rights of autistic persons (2023/2728(RSP)), Recital M. [https://www.europarl.europa.eu/doceo/document/TA-9-2023-0343\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-9-2023-0343_EN.html)

In the next stage of the Strategy, Autism-Europe calls on the European Commission to continue supporting autism awareness-raising activities throughout the EU and to strengthen understanding of autism within education systems. Autism-Europe also calls for an EU-funded research project examining the resourcing of mainstream education support services across regions, in order to identify gaps, disparities and promising approaches. Cohesion funding should be utilised to address interregional inequalities by identifying and developing solutions that strengthen mainstream education support provision and promote equitable access across the EU. In addition, the Commission should continue to promote and disseminate good practices related to inclusive education for autistic people, while actively promoting and defending the right of autistic learners to education on an equal basis with others. Particular emphasis should be placed on continuous learning and training for educators working with autistic people, ensuring they are equipped with the skills and knowledge needed to provide appropriate support within inclusive settings. Autistic learners across Europe too often face segregation, exclusion or inadequate support. The next phase of the Strategy for the Rights of Persons with Disabilities should include a clear commitment to developing inclusive education systems, supported by EU guidance and funding. This includes prioritising investment in inclusive schooling, accessible learning environments, universal design for learning and training for educators on autism and disability inclusion. The EU should also ensure that its funding streams are not used to maintain or expand segregated educational settings. The EU should also support initiatives to develop services for young autistic people during the crucial transition to adulthood, bringing together support with education, employment, housing and mental health. Systematic collection of disaggregated data by disability type is essential to understanding the barriers faced by autistic learners and tracking progress towards inclusion.

## 4.2 Employment and skills

Autistic people face disproportionately high unemployment rates and barriers to accessing and maintaining work. According to estimates,<sup>7</sup> only 10% of autistic adults have some form of employment, mainly sheltered or supported employment, compared to 47.9% of persons with disabilities and to 71.5% of persons without disabilities as reported by Eurostat.

Inclusive employment for autistic people depends not only on employers, but also on colleagues and teams within the workplace. Colleagues play a crucial role in shaping daily working conditions, social inclusion and workplace culture. A lack of awareness or understanding among co-workers can create social and communication barriers that undermine inclusion, even where reasonable accommodations are in place.

Autism-Europe supports the creation of an EU Disability Employment and Skills Guarantee, provided it explicitly addresses the specific challenges faced by autistic jobseekers.

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<sup>7</sup> Autism-Europe (2023) Bridging the autism employment gap in Europe: a compendium of current practices and initiatives <https://www.autismeurope.org/blog/2023/08/13/bridging-the-autism-employment-gap-in-europe-a-compendium-of-current-practices-and-initiatives/>

Personalised employment support, accessible recruitment processes, autism-informed workplace adjustments and targeted training for employers are essential components of an effective approach. Efforts to support inclusive apprenticeships, traineeships and lifelong learning opportunities must also be reinforced. Workplace inclusion measures must target both employers and colleagues, including autism awareness and training programmes for teams, guidance on inclusive communication and social interaction, and the promotion of supportive workplace cultures. These measures are essential to enabling autistic people not only to access employment, but to remain, progress and thrive in the open labour market. The EU should encourage Member States to provide employers with better support and incentives to enable autistic people to find, stay and thrive in work. Autistic people's employment outcomes cannot improve without dedicated measures tailored to their needs.

## 5. Accessibility

### 5.1 Creating an EU Accessibility Agency

Accessibility for autistic people extends beyond physical infrastructure to include cognitive, sensory and communication accessibility. For autistic people, accessibility must explicitly include the use of Easy-to-Read and Easy-to-Understand language, as well as the use of clear visual supports such as pictures, symbols and visual cues. Complex language, abstract terminology and inconsistent communication create significant barriers to accessing information, services and rights.

The development of binding accessibility standards should therefore require public authorities, service providers and EU institutions to systematically use plain language, Easy-to-Read formats, visual supports and predictable communication across legislation, public information, administrative procedures and digital services. These measures are essential to ensuring that autistic people can understand information, make informed choices and exercise their rights on an equal basis with others.

Autism-Europe supports transforming the AccessibleEU resource centre into a permanent decentralised EU Accessibility Agency whose role would be focused on monitoring Accessibility policy across different domains, such as transport, communications, education and public administration.

Such an agency should be responsible for promoting and monitoring the adoption of binding technical standards on sensory, cognitive and communication accessibility across all relevant legislation. It should also play a role in enforcement and redress mechanisms, support Member States in implementing accessibility requirements, and provide training to professionals such as architects, Information Communication and Technology (ICT) developers, educators and public officials on autism-friendly design and communication. Cooperation with autistic people and their representative organisations must be embedded in the agency's mandate.

## 6. Governance

### 6.1 Strengthening participation of autistic people

Autistic people and their representative organisations must be meaningfully involved in all stages of the Strategy's development, implementation, monitoring and evaluation. Participation processes must be accessible, adequately resourced and designed to enable the effective involvement of self-advocates and disabled persons organisations. This requires sustained funding for representative organisations and explicit, legally entrenched mechanisms for consultation at EU level, as was called for by the UN CRPD Committee to the EU to fully comply with its consultative obligation under article 4.3 of the UN Convention for the Rights of Persons with Disabilities.<sup>8</sup> Accordingly, the European Commission should enhance co-production, notably in the framework of the Disability Platform, which brings together representatives of organisations of persons with disabilities, the European Commission and representatives of all EU member states to further consolidate EU disability governance.

### 6.2 Monitoring and evaluation

The evaluation of the first phase of the Strategy remained an internal exercise by the European Commission. The next phase should include a comprehensive mid-term evaluation, with published methodology and publicly available results. All evaluations of disability-relevant legislation should include accessible consultation processes to ensure the involvement of autistic people and their organisations. In its review of the EU in 2025, the UN CRPD Committee noted that European legislation, policy and practices have not yet been systematically reviewed in light of the UN CRPD.<sup>9</sup> The comprehensive review called for now the second time, should be done in close collaboration with disabled people and their representative organisations. Transparent reporting and external monitoring are essential to ensuring accountability and meaningful progress.

Due to the importance of effective evaluation in determine the success of the strategy, it is ever more pressing that data concerning disability is collected by Eurostat. Such data collection efforts should take a bespoke approach to Disability, and employ criteria codesigned with persons with disabilities. It is important that such a data should be updated and uploaded periodically.

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<sup>8</sup> Committee on the Rights of Persons with Disabilities, *Concluding observations on the combined second and third periodic reports: Regional review — Europe* (UN Doc. CRPD/C/EUR/CO/2-3, 2024), [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FEUR%2FC%2F2-3&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FEUR%2FC%2F2-3&Lang=en)., para 17

<sup>9</sup> Ibid, para 8

## 7. Conclusion

The next phase of the Strategy for the Rights of Persons with Disabilities must be more ambitious and more responsive to the specific needs of autistic people. While progress has been made, autistic persons continue to face structural barriers limiting their participation, autonomy and equality and their needs remain insufficiently reflected in current disability policies. The Strategy must commit to a rights-based framework that ensures meaningful accessibility, inclusive education and employment, community-based support, freedom of movement, and genuine participation in all areas of life. By making autistic people visible within the Strategy, the EU can take a decisive step towards ensuring that no one is left behind and that autistic people enjoy their rights fully and equally across Europe

Autism-Europe stands ready to collaborate with the European institutions, EU Member States, civil society and other stakeholders to ensure that the 2025–2030 Strategy delivers tangible improvements in the rights and lives of autistic people across Europe.

**Autism-Europe** is an international non-profit association based in Brussels that works to advance the rights and improve the quality of life of autistic people and their families across Europe. As an umbrella organisation, it brings together over 90 member associations from around 40 countries, representing an estimated seven million people in Europe.