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Deutsche Sozialversicherung
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Feedback from German Social Insurance issued 2 February 2026

on the public consultation “Improving the strategy for the
rights of persons with disabilities until 2030”

I. Preliminary remark

In March 2021, the European Commission presented the Strategy for the Rights of Persons with Disabilities 2021 to 2030.¹ The aim of the strategy is to promote equal opportunities, self-determination and inclusion of persons with disabilities in Europe and beyond. The measures and flagship initiatives set out in the strategy were largely launched or implemented by the end of 2024. The German Social Insurance (DSV) advocates that the European Commission adopt new, ambitious measures for the period 2026-2030 to further improve the living conditions of persons with disabilities in the European Union.

II. Opinion

The Strategy for the Rights of Persons with Disabilities identifies key areas for action to improve the protection of persons with disabilities. These are intended in particular to promote accessibility, the exercise and enforcement of EU rights, independent living, as well as equal access, safety and protection for persons with disabilities. To implement these objectives, several initiatives have already been launched, including the package to improve labour market opportunities for persons with disabilities, guidelines on independent living and inclusion in the community, the European Disability Card, and the pooling of resources on the AccessibleEU platform. Although the implementation of the flagship initiatives is already well advanced, there is still room for improvement, particularly with regard to the actual use of the guidelines and resources provided. The DSV therefore calls on the European Commission to systematically monitor the extent to which and the way in which Member States apply the instruments provided, and, where necessary, to take targeted support measures to improve their use.

From the DSV's perspective, the assessment of progress over the past five years is overall mixed. On the one hand, positive legal developments can be observed, particularly in connection with the implementation of the UN Convention on the Rights of Persons with Disabilities and the Federal Participation Act in Germany. On the other hand, many persons with disabilities in the European Union continue to face significant barriers. This concerns in particular access to transport services and digital services, as well as key areas of life such as infrastructure, freedom of

¹ [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030. COM\(2021\) 101 final.](#)



movement, healthcare services, independent living and accessible housing. Against this background, the DSV calls on the European Commission to present additional flagship initiatives for the remaining duration of the strategy and to consistently further develop existing measures. A particular focus should be placed on inclusive access to healthcare services, especially on removing physical, communicative and organisational barriers. In addition, the strategy should explicitly address the accessibility of healthcare facilities such as doctors' practices and examination rooms, as well as transport infrastructure and vehicles, as these are a key prerequisite for social participation, mobility and independent living. Accessibility in the areas of healthcare services, transport and public transport should therefore be explicitly anchored in the new strategy.

Despite the measures adopted under the strategy to improve labour market opportunities for persons with disabilities, a renewed increase in the unemployment rate among persons with disabilities in Europe has recently been observed. In many areas, sustainable inclusion in the labour market has not yet been achieved. The DSV therefore advocates an evaluation of the implementation and use of the package by 2028 at the latest. Based on the results, concrete proposals should be presented by 2030 on how the use and effectiveness of the measures can be increased. Furthermore, the DSV suggests explicitly promoting the exchange of best practices between Member States, particularly in the area of return-to-work and labour market integration. A systematic collection of existing initiatives in the Member States could be a useful complement to the measures aimed at improving labour market opportunities for persons with disabilities.

The ongoing digitalisation also requires that accessibility of ICT products and services for persons with disabilities be ensured in all EU measures. Digital technologies are a key gateway to equal participation in almost all areas of life, particularly in employment, education, access to public services and information, as well as in culture, leisure and health. In this context, the European Commission should clearly commit to ensuring that new regulations on the use of artificial intelligence in the employment context explicitly exclude the risk of discrimination against applicants and employees with disabilities. Algorithm-based decision-making processes must also not reinforce existing disadvantages. This must be explicitly taken into account, particularly in the context of the planned Quality Jobs Act.

About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.