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# Submission from DPOD on the Draft General Comment on article 27 in the UNCRPD

## **1. Introduction**

Disabled People’s Organisations Denmark (DPOD) is an umbrella organisation for 35 organisations of persons with disabilities. We cover all types of disabilities, and our purpose is to enable persons with disabilities to live a life like everyone else. Our work is based on the UNCRPD, and one our political priorities is to promote a fully inclusive labour market.

In general, we are pleased with the draft GC, and the members of the Committee and the staff of the secretariat really deserve credit for their work so far.

## **2. Specific Comments**

**2.1. A recommendation on vocational training and education to be added**

People with disabilities do not have equal access to education. A gap between the outcomes of learners with and without disability remains worldwide. This is a huge problem, because having the right skills is a necessary condition for accessing and succeeding in modern labour markets.

We are pleased that vocational training and education are mentioned in the draft GC (for example, in para. 72 d, iv, and para. 91).

But because of their importance, we commend that a reference to them is inserted in a proper place in para. 97 (“VI. Implementation at the national level”) as well.

Text proposal:

“Review policies and measures to ensure that national skills strategies cover people with disabilities, set targets for increasing their participation, and include measures for combatting barriers to equal access to vocational training and education in general.”

**2.2 A reference to article 25 on health in the UNCRPD to be added**

We are pleased to note the reference to article 26 in UNCRPD on habilitation and rehabilitation (for example, in para. 92), and we agree with the wording.

We suggest, though, that the Committee includes a reference to article 25 on health as well. We believe that article 25 is interrelated and interdependent with article 27 in important ways.

Equal access for persons with disabilities to health, health services, and health insurance is a prerequisite for accessing and succeeding in the labour market. Labour market participation on fair and equal terms, on the other hand, impacts health in many positive ways.

Given the fact that massive inequality in health for persons with disabilities prevails, article 25 deserves to be mentioned.

Proposal:

A new paragraph on article 25 in the UNCRPD is to be added to para. 79 (“V. Relationship with other specific articles of the Convention”). The focus should be on the obligations of State Parties to ensure equal access to health in order to safeguard and promote the rights of persons with disabilities in field of work and employment.

**2.3 A stronger focus on women with disabilities should be added**
We are pleased to note the focus on women with disabilities and the fact that they are less likely to access managerial positions (as listed in para. 4). We also agree with the focus listed in paras. 10, 25, 40, 62, 63, 64, 67, and 80.

We suggest, though, that special measures should be recommended where women are underrepresented or disadvantaged in both the public and the private sector to significantly increase the number of women with disabilities in Boards of Directors and management positions.

Text proposal:

A sentence should be added between the third and fourth sentence in para. 67.:

“The State Parties should when women are underrepresented or disadvantaged in the public and/or the private sector, including private companies, take special measures to significantly increase the number of women with disabilities being members of Boards of Directors and occupying management positions.”

**Yours sincerely,**

Sif Holst

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