



**Submission to the XXI session of the Committee on the  
Rights of Persons with Disabilities**

**Submission by GRIP**

February 2019

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## Who are we?

**GRIP (Gelijke Rechten voor Iedere Persoon met een handicap - Equal Rights for Every Person with a Disability)** is a Flemish civil rights organization for persons with disabilities. GRIP strives to promote equal opportunities and equal rights for persons with disabilities by influencing society and policies.

We previously submitted '**Human Rights and Persons with Disabilities, Shadow report Flanders (Belgium) 2011**' and several submissions concerning the implementation of the CRPD in the Flanders region of Belgium.

This submission consists of brief updates on Belgium's compliance with the CRPD and suggested questions for the simplified reporting procedure.

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## Introduction

Belgium signed the UN Convention on the Rights of Persons with Disabilities and its Optional Protocol in March 2007. These instruments have been ratified on 2th of July 2009. Belgium submitted this first report to the CRPD in July 2011. On 3th of October 2014, the CRPD submitted the Concluding Observations (CO) on the initial report to the Belgian State.

Under the simplified reporting procedure, the State Party Report Initial Due Date for Belgium is 2<sup>nd</sup> of August 2019. Periodic reporting, including under the simplified reporting procedure, entails reporting on the implementation of the Committee's recommendations included in the previous concluding observations and new developments that have

occurred in the State party<sup>1</sup>. To prepare the periodic report a List of issues prior to submission (LOIPR) will be published by the Committee. In this contribution, GRIP wishes to address the Committee with some suggestions for this LOIPR. We introduce these questions with brief updates on specific articles.

## **General Observations on the implementation of the Convention on the Rights of Persons with Disabilities in Belgium/Flanders**

GRIP acknowledges the small, initial steps that were taken at the various levels of government following the ratification of the Convention on the Rights of Persons with Disabilities (CRPD). Concrete examples include the increased exemption of the 'price of love'<sup>2</sup> (the part of the partner's income that is taken into account for the calculation of the integration allowance) and the decree on the right of students to enrol in education (and its amendments in 2012)<sup>3</sup>. These steps demonstrate an openness to acceptance of the Convention.

However, GRIP must also voice concerns. We observe that both policymakers and the media often struggle with the underlying perspective of the CRPD. The distance between the desirable situation and the actual situation remains considerable. We must ask ourselves: are the stakeholders in fact fully prepared to apply the principles detailed in the UN Convention?

For example, there is a tendency to get stuck in political discussions about how to interpret the notion of inclusion. GRIP strives to keep the meaning of the terminology clear, in line with the CRPD and the General Comments. Although the terminology from the UN Convention is included in laws and regulations, a medical model remains dominant.

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<sup>1</sup> Guidelines on periodic reporting to the Committee on the Rights of Persons with Disabilities, including under the simplified reporting procedure Adopted by the Committee at its sixteenth session (15 August-2 September 2016).

<sup>2</sup> FOD SZ DG PmH, <https://handicap.belgium.be/nl/news/270718-prijs-liefde.htm>, consulted on 4 December 2018.

<sup>3</sup> <https://codex.vlaanderen.be/PrintDocument.ashx?id=1021962&datum=&geannoteerd=false&print=false#H1057370>, consulted on 13 December 2018.

## **Articles 1-4: purpose, description of concept, general principles and general obligations**

In Belgium and Flanders, there is no real integrated plan or strategy for the implementation of the rights of persons with disabilities. The policy is fragmented across different administrative policy-making levels, as well as different policy areas. These aspects prevent a coherent approach to the application of the CRPD. New policy developments are not always compliant with the UN Convention. Stakeholders often apply their own interpretation to crucial concepts.

For example, the new funding system according to the Decree on Personal Funding (PF) (*Decreet PersoonsVolgende Financiering or PVF*) is referred to as the implementation of article 19. GRIP disputes this on multiple grounds. The PF-decree is not a strategical instrument for independent living, nor are the means sufficient. Also, within the policy area of education, Flanders continues to operate a separate system for special education.

A Flemish advisory council on disability has been in the initial start-up phase since November 2018. The council was established on the basis of a provisional project subsidy. The council needs to be structurally embedded during the preparation, monitoring and evaluation of the policy.

### **Proposed questions articles 1 to 4**

1. What efforts have been made to harmonise the existing legislation with the CRPD (CO5)<sup>4</sup>?
  - a. What initiatives of their own have the various authorities taken within the context of harmonisation with the CRPD?
  - b. What initiatives have the various authorities taken jointly within the context of harmonisation with the CRPD?
  - c. What have the results of these initiatives been?

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<sup>4</sup> CO is the abbreviation for 'concluding observation(s)'. The observations were reactions of the Committee on the Rights of Persons with Disabilities, concerning the initial report from Belgium.

2. What strategic steps have been taken to systematically cross-check the new legislation against the CRPD?
3. What legislative initiatives have been taken and developed by the State specifically related to persons with disabilities?
4. What general legislative initiatives of the State resulted in positive effects for persons with disabilities?
5. What measures are being taken by the State to establish a clear, concise definition of 'disability' across all policy areas and administrative levels?
6. What initiatives have been taken to ensure the valuable participation of persons with disabilities in the policymaking? (CO9)?
7. What guarantees can be provided for the structural embedding of initiatives that will ensure valuable participation in the policymaking process? (CO10)?

### **Article 5: equality and non-discrimination**

In society at large and more specifically, among persons with disabilities themselves, there is little awareness about the human-rights model, disability rights and the concrete rights of persons with disabilities. This could contribute to discrimination of persons with disabilities. The number of lawsuits about the discrimination concerning disabilities in public life has remained relatively small to date.

The theme of disability (including support and reasonable accommodations in the workplace) remains too little associated with human rights and anti-discrimination.

The lawsuits (often at the initiative of or with the support of Unia<sup>5</sup>) have mainly concerned discrimination in the field of employment and access to goods and services. Reasonable accommodations are not yet consistently provided in all situations. There are often shortcomings in terms of the awareness of and information about reasonable accommodations. It is not made clear enough in the current law that denial of reasonable accommodation constitute discrimination.

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<sup>5</sup> Unia is the Belgian independent public institution which combats discrimination and promotes equal opportunities.

## Proposed questions article 5

8. What efforts are being made to tackle down the discrimination of people with disabilities (for example on the housing market)?
9. What efforts are being made at the competent administrative level to reinforce the right to reasonable accommodations?
  - a. How are reasonable accommodations enforceable by law and in practice?
  - b. What efforts is the State undertaking to make denial of reasonable accommodations equivalent to discrimination in practice and thus to sanction the denial of reasonable accommodations?
10. What working methods have been developed and applied to measure the equality and non-discrimination of persons with disabilities in comparison to other citizens?

## Article 8: promoting awareness

In general, we can note that the paradigm shift towards an awareness of the capacities and social contributions of persons with disabilities is virtually inexistent. The vision of disability in Flanders remains statically, based predominantly on the medical model. There is no strategy for raising awareness of the UN Convention and for a paradigm shift. In the past, GRIP and Unia have organised various campaigns about the CRPD. We are still waiting for the government to launch an effective awareness raising campaign about the UN Convention.

The campaigns mounted by Equal Opportunities Flanders (*Gelijke Kansen Vlaanderen*) ("People with disabilities are ordinary people<sup>6</sup>" in 2013, and "The week of universal design<sup>7</sup>" in 2016) made no explicit or precise reference to the UN Convention or the human rights based model.

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<sup>6</sup> *Gelijke Kansen*, <http://www.gelijkekansen.be/Praktisch/Campagnes/Mensenmeteenhandicap.aspx>, consulted on 4 December 2018.

<sup>7</sup> *Gelijke Kansen*, <http://www.gelijkekansen.be/Praktisch/Campagnes/WeekvanUniversalDesign.aspx>, consulted on 4 December 2018.

In the media, the approach to disability is evolving slowly. Certain promising TV-programmes (*Down the road* and *Over Winnaars*) still do not fully shift the paradigm.

### **Proposed questions article 8**

11. What efforts are being made by the State to achieve the paradigm shift that the Convention represents (CO19)?
12. What results can the State present that demonstrate a paradigm shift?
13. What strategy has been developed nationally for raising awareness on the content of the Convention?
  - a. Which awareness raising campaigns have been organised?
  - b. What have been the results of the strategy? (CO 18)?
14. Please provide detailed information about the way persons with disabilities are depicted in the media (CO 19).
15. Please provide detailed information about the steps that have been taken to make the media more aware of the need to present a better image of persons with disabilities and to include them in the media landscape (CO 20).

### **Article 19: independent living and social participation**

The Flemish decree of 24<sup>th</sup> of April 2014 on Personal Funding for persons with disabilities and the reform of the method of funding in care and support for persons with disabilities (PF-decree<sup>8</sup>) and their associated implementing decrees, determine the procedure for funding care and support in Flanders. One positive aspect is the possibility for direct funding. The decree regulates the institutions. They no longer automatically receive funding directly from the government.

The PF-decree distincts two steps in Personal Funding: a first step (1) Basic Support Budget (BSB) (*BasisOndersteuningsBudget* or BOB) and a second step (2) Personal Budget or PB (*PersoonsVolgend Budget* or PVB).

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<sup>8</sup> Flemish Codex,  
<https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1024475&param=inhoud>,  
consulted on 4 December 2018.

The second step implies -on paper- the detachment of the budgets from the institutions and their allocation to the individual persons.

However, with the out roll of this decree, the Flemish government is creating divergent pathways, with neither pathway including an enforceable right to appropriate support that is tailored to the actual support need(s).

The BSB provides a minimal fixed amount (that is the same for everyone and) that in many cases is insufficient to cover the actual costs of care<sup>9</sup>. In the case of minors with disabilities, in Flanders, there has only been an incremental start towards introducing the BSB. But, there is a continued focus on a range of supply-orientated services. These services are not always the appropriate answer to the actual support need(s). For minors, step two of the PF-decree is currently still not implemented. Also, the PF-decree does not resolve the persistent problem of the long waiting lists. The problem of waiting lists continues and represents a violation of the right to support. Because of inadequate financial investments, the multiple levels of government within the Belgian State often fail to provide an appropriate response to a legitimate application for support within a reasonable period of time. In addition, Flanders is continuing to invest, for minors as well as for adults, in Directly Accessible Help (DAH) (*Rechtstreeks Toegankelijk Hulp* or RTH). DAH is part of a range of supply-orientated services.

Minors with disabilities are admitted to facilities more frequently than they are provided with a Personal Assistance Budget (*Persoonlijke AssistentieBudget* or PAB). In 2017, the Intersectoral Regional Priorities Commission (*Intersectorale Regionale Prioriteiten Commissie* or IRPC) allocated a new PAB to 228 minors as compared to 2,288 newly started help in institutional services for youth<sup>10</sup>. New pathways towards segregation are being stimulated because the average waiting time for

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<sup>9</sup> L. Op De Beeck e.a.  
[https://www.vaph.be/sites/default/files/documents/evaluatieonderzoek-naar-de-  
implementatie-van-het-  
basisondersteuningsbudget/2018\\_07\\_rapport\\_11\\_ef12\\_vaph\\_bob.pdf](https://www.vaph.be/sites/default/files/documents/evaluatieonderzoek-naar-de-implementatie-van-het-basisondersteuningsbudget/2018_07_rapport_11_ef12_vaph_bob.pdf), consulted on 20 December 2018.

<sup>10</sup> Vlaams Loket Jeugdhulp (Flemish Youth Aid centre),  
<http://jaarverslagjeugdhulp.be/2017/intersectorale-toegangspoort-jeugdhulpregie>,  
consulted on 4 December 2018.

residential institutionalisation is only a quarter as long as the average waiting time for a PAB.

Of all the people waiting for a PAB, there are 230 minors waiting between ten and eighteen years! 162 minors are waiting between five and nine years for a PAB. Overall 574 children and adolescents are waiting for more than 3 years on their PAB<sup>11</sup>. These numbers are (only) cases handled by the intersectoral regional priorities commission. GRIP emphasizes the positive impact a (allocated) PAB has on the development, support and empowerment of children and adolescents with a disability. Hence, we plea to put an end to these long waiting times and to decrease the waiting time for every entitled individual.

An efficient housing policy for persons with disabilities is lacking. Via the Flemish Infrastructure Fund for Matters relating to Individuals (*Vlaams Infrastructuurfonds voor Persoonsgebonden Aangelegenheden* or VIPA) resources are being invested in ea. residential care facilities. However, this is hampering freedom of choice. Many disabled persons live in residential care facilities. There is still no plan for deinstitutionalisation. All administrative levels of the State would, in a deinstitutionalisation plan, need to guarantee access to services that would enable persons with disabilities to live independently and thus participate fully in society (CO33).

### **Proposed questions article 19**

16. What measures are being taken by the State to remedy the persistent phenomenon of waiting lists (CO33)?
17. Please provide detailed information about:
  - a. the evolution in number of minors with a disability who live in residential care facilities as opposed to living independently.
  - b. the evolution in number of adults with a disability who live in residential care facilities as opposed to living independently.
18. What financial resources are the regional authorities allocating to collective care for people with disabilities (minors, adults and senior

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<sup>11</sup> Flemish Parliament, <http://docs.vlaamsparlement.be/pfile?id=1446812>, consulted on 5 February 2019.

citizens)? By collective care, we are referring to institutions, day care centres, semi-residential facilities and residential care facilities.

19. What financial resources are the regional authorities allocating to personal assistance (one-on-one support with free choice of assistant that is funded through cash-resources, as opposed to services for personal assistance and services for family care)?
20. Can the different administrative levels (multi-level) present a strategy and concrete action plan for deinstitutionalisation, including structural reform, accessibility and awareness raising (CO33)?
21. Which and how much resources have been shifted from 'institutional care' to a 'community-based approach'? In a community-based approach, the wishes and preferences of the individual with a disability are respected.
22. How is the right to support according to the individual needs legally established?
  - a. What legal resources are available to the person with a disability to enforce his/her right to appropriate support, ranging from defending their interests in the application procedure up to the point of the allocation of the budget?
  - b. In the context of limited resources, how does the State prioritise certain applications for support?
23. How will the State adequately implement and execute legislation that converts the fact that parents can place their child more quickly in institutions, than having access to support via a Personal Assistance Budget?
24. When will the possibility for direct funding being (re)considered for home-based assistant services to youth?
25. What initiatives are there to support families in avoiding placement in an institution (CO35)?

## Article 24: education

The M-decree of 21th of March 2014 on measures for students with specific educational needs<sup>12</sup> and the related implementing decrees define how education for students with a disability should be organised. The decree stipulates that inclusive education (from that point onward) is the first option. The goal is to allow more students to attend school in the regular education system and thus, to send fewer students to schools for special education.

A student with specific educational needs has the right to enrol in a regular school. The student can study the common curriculum (if he/she meets the admission requirements for regular education and has a report justifying this) or an individually adapted curriculum (if he/she has a report of a Counselling Centre for Pupils (*Centrum voor LeerlingenBegeleiding* or *CLB*)) justifying admission to the special education system. Nevertheless, GRIP observes that schools often recommend a transfer to the special education system or refuse to provide reasonable accommodations (that they justify under lack of funding, material resources and personnel). GRIP is also surprised to note that the Flemish government and the Flemish Minister for Education are continuing to operate from the assumption of a dual system, with a separate system for special education alongside the regular education system.

The Minister for Education has even repeatedly stated that the continuation of the current dual system is in line with the inclusive perspective of the CRPD<sup>13</sup>. In any case, in Flanders and Belgium, too many persons with disabilities are still being referred to a segregated setting such as the special education system. The ruling of an independent judge in a court of first instance on 7<sup>th</sup> of October 2018 indicates that there are problems in the application of the right to enrol, as well as a shortage of support and a conditional vision of that support.

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<sup>12</sup> Flemish Codex, [https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1024474&param=inhoud&ef=search&A\\_VDS=](https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1024474&param=inhoud&ef=search&A_VDS=), consulted on 4 December 2018.

<sup>13</sup> GRIP vzw, <https://www.gripvzw.be/nl/artikel/212/grip-is-verontwaardigd-over-de-uitspraken-van-minister-crevits>, consulted on 18 December 2018.

## Proposed questions article 24

26. How are the various regions developing high-quality education, at all educational levels, in line with the prospect of replacing all forms of special education with inclusive education (CO36)?
27. Which legal grounds do pupils/students with disabilities and their legal guardians/parents have, regarding the enrolment in a school of their choice (right to enrol)?
28. What sanctions are imposed when a school refuses enrolment in a school of choice?
29. How is sufficient and appropriate support being offered for all students with disabilities within the education system (CO37)?
30. What measures are being taken to increase/achieve the structural involvement of parent associations (of children with disabilities) and of children with disabilities themselves in the educational policy?
31. Please provide information on the position of Belgium and the various regional government administrations regarding the continued existence of a separate system for special education.

## Article 27: employment and employment opportunities

In the *Inclusiespiegel Vlaanderen 2016*<sup>14</sup>, GRIP compares various indicators over a timeframe of ten years (2006 and 2016). The indicator for the rate of *employment of persons with disabilities* in comparison to the percentage of the *population actually employed* from the year 2007 and the year 2015 are compared in *chapter 2*. The gap in the employment rate between persons with and without a disability persists and remains as wide as ever.

Government measures are not sufficiently based on the assumption of inclusive employment and provide inadequate support on the open labour market.

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<sup>14</sup> GRIP vzw See <http://www.gripvzw.be/gelijkekansenbeleid/inclusie-meten/1198-persbericht-grip-inclusiespiegel-vlaanderen-2016.html>

The target group of professionally and academically trained individuals with an employment disability requires specific attention to combat prejudice and to promote equal opportunities. For employees with disabilities who have had practical training, segregation is all too often still reinforced and sheltered workshops are often seen as the first option (for example government contracts to sheltered workshops are included in the employment figures).

As such, the Flemish Support Bonus (FSB)<sup>15</sup> (*Vlaamse OndersteuningsPremie* or VOP) appears to be a good measure, however, it has several shortcomings: several groups are not eligible for a FSB, a FSB-application involves extensive red tape and there is not enough focus on reasonable accommodations.

The draft memorandum individual job support (*individueel maatwerk*) appears to be a step towards the individual engagement of employees who need a customised employment support package. In the draft memorandum, consideration is given to different modules: training in the workplace, support in the workplace and a salary bonus. Unfortunately, this draft has not been further elaborated, for example, in a decree. Currently, none of the government administrations are meeting the target figures for the employment of persons with disabilities in their workforce. The target figure for both the Flemish and the federal government is 3 %. The Flemish government is achieving a percentage<sup>16</sup> of 1.4. The federal government is achieving 1.37%, with the following observation: in 2017, five federal organisations surpassed the target figure of 3% for employment of persons with disabilities<sup>17</sup> (as compared to six in 2016).

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<sup>15</sup> 'The Flemish Support Bonus is a bonus for an employer who recruits (or has recruited) a person with a disability. The aim of the FSB is to promote the integration of people with disabilities into working life by compensating any extra costs and lower productivity that the disability entails for the employer. In this way, the Flemish government wants to make it more attractive for employers to hire and keep employing people with a (obtained) disability. A self-employed person with a disability can also apply for the bonus for himself'. Translation from Dutch via the webpage Werk.be, <https://www.werk.be/online-diensten/vlaamse-ondersteuningspremie-vop>, consulted on 2 February 2019.

<sup>16</sup> Government of Flanders, <https://overheid.vlaanderen.be/bedrijfsinformatie/personneelsleden-met-een-handicap-chronische-ziekte>, consulted on 4 December 2018.

<sup>17</sup> Fedweb/Bosa, <https://fedweb.belgium.be/nl/nieuws/2018/tewerkstelling-personen-met-een-handicap-lichte-daling-2017>, consulted on 4 December 2018.

Entrepreneurs with disabilities receive only limited support for carrying out their activities. The FSB (in practice, a personal extra budget) is too low. Entrepreneurs who are not (any longer) able to run their businesses full-time because of a disability, find it very often difficult to keep the business going. There is a need for more measures to enable them to combine a support grant with entrepreneurship.

### **Proposed questions article 27**

32. What has been the evolution in the paid employment of persons with disabilities on the open labour market, in figures?
  - a. What step-by-step plan is there for dismantling the separate circuits and for more support in the open labour market?
  - b. Are efforts being made to create a system for permanent socio-economic monitoring?
33. What measures are being taken to compensate disabilities immediately following graduation, in the context of a smooth transition of recently graduated persons with disabilities from postsecondary education to the open labour market?
34. What is the status concerning the Flemish government's draft memorandum on individual job support?
35. How will, in line with the committee's recommendation, quotas and other positive action(s) be developed for the employment of persons with disabilities (CO 38)?
36. How are the government authorities at all administrative levels managing to set an example in terms of the employment of persons with disabilities?
  - a. How is the exemplary role translated into target figures and evolution in the employment figures (CO 38)?
37. What regulatory and encouraging measures have been taken since 2014 to safeguard the right of persons with disabilities to employment in both the private sector and the public sector (CO 39)?
38. How will the State ensure the role of sheltered workshops as promoter to access to the open labour market, in terms of real employment of persons with disabilities?

- a. How is sufficient mobility towards the open labour market ensured?
39. How are reasonable accommodations and assistance for persons with disabilities ensured in the workplace? How does the State ensure that employers who do not provide reasonable accommodations and support measures are sanctioned?
40. What measures are being taken by the State to allow persons with disabilities to combine support grants with entrepreneurship/running their own business?

### **Article 28: decent standard of living and social protection**

Persons with disabilities often slip into poverty. Their standard of living is precarious. In the GRIP publication **#inclusion#income, for a dignified life, now and in the future** (*#inclusie#inkomen, voor een menswaardig leven nu, en in de toekomst*<sup>18</sup>) multiple persons with disabilities witness about their income and standard of living.

In certain cases (and subjected to conditions<sup>19</sup>) the recognition of the disability by the Federal Public Service, Social Security, directorate general for persons with disabilities, entitles to social protection through what are known as allowances or *bijstandsuitkeringen*.

In Belgium there is (1) an income substitution allowance (*InkomensVervangende Tegemoetkoming* or *IVT*) and, in specific cases, (2) a gradual integration allowance (*IntegratieTegemoetkoming* or *IT*). However, and GRIP stresses out explicitly, many persons (with a disability) remain in a too precarious position in terms of income and do not receive sufficient social protection.

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<sup>18</sup> GRIP vzw, [https://cdn.digisecure.be/grip/20185251550726\\_inclusieinkomen.pdf](https://cdn.digisecure.be/grip/20185251550726_inclusieinkomen.pdf), consulted on 16 January 2019.

<sup>19</sup> The conditions are: points in terms of reduced autonomy, family composition and income conditions.

The income substitution allowance is often lower than the standard minimum benefits. Quite often, when the entitled individual has employment of any sort (including employment with lower pay or temporary work at a different ratio, for example part-time mode) the benefits taper off too rapidly. The integration allowance reduces or stops when the entitled individual or even their family members partner generate a certain level of (replacement) income. Because of the above-mentioned issues, entitled individuals and their family members are often forced to use money from their household budget to pay for extra costs related to the disability. They therefore sink deeper into the vicious circle of poverty.

Retaining the disability-specific benefits to help pay for the added costs resulting from the disability, at the start of employment and regardless of the income, would facilitate full social participation.

### **Proposed questions article 28**

41. Please provide detailed information on the persons with disabilities in Belgium living below the European poverty line.
42. Please provide detailed information on the status of the financial support provided for persons with disabilities (and their families) to compensate for the costs resulting from their disability.
43. What measures are being taken to prevent the loss of allowances at the start of employment (part-time mode)?

### **Article 31: statistics and data collection**

As of 2019, there is no coordinated approach to the collection of data on the realisation of the CRPD. GRIP regrets the lack of a standardised set of indicators for a baseline measurement. Systematic monitoring and data collection would provide a clear picture of the implementation of the CRPD.

## Proposed question article 31

44. How will the State carry out systematic and coordinated data collection about persons with disabilities (CO 42)?

## Article 32: development cooperation

We see little involvement of persons with disabilities in the policy on development cooperation. GRIP believes that there would be added value in an interplay between the CRPD and Sustainable Development Goals (SDGs). The Convention focuses on persons with disabilities, while the SDGs promote the mainstreaming of the human rights of persons with disabilities. The sustainable development goals can serve as a political framework or compass for the legislative implementation of the provisions of the binding CRPD. In this way, the State would be able to promote sustainable development for all persons (with disabilities).

The platform on disability and development cooperation (*Platform Handicap en Ontwikkelingssamenwerking* or PHOS) lost its federal and Flemish subsidies and was dissolved in 2014. No other organisation took over the goals of the platform.

The goals of PHOS included striving towards inclusive development cooperation, involving persons with disabilities in the drafting, execution and monitoring of agreements with partner countries concerning the Millennium Development Goals and later sustainable development goals.

## Proposed questions article 32

45. In the eyes of the State and its various levels of administration, what kind of synergy would be created by linking the sustainable development goals and the CRPD? How will Belgium ensure such linkage?
46. What initiatives have been taken to involve persons with disabilities in the policy on development cooperation?

### **Article 33: national implementation and oversight**

The inter-Federal focal point, the 'COORMULTI' (multilateral coordination meetings) doesn't invest enough in the involvement of civil society. These bodies do not collaborate with critical members of civil society. Although Unia continues to be tasked with oversight of the implementation of the CRPD, it does not have NHRI 'A' status.

To obtain 'A' status, Unia would have to be converted into a national - in the case of Belgium, interfederal - human rights institution that fully subscribes to the Paris Principles.

#### **Proposed questions article 33**

47. How are persons with disabilities and the associations that represent them actively involved in the process of implementation and monitoring the CRPD at various governmental levels?
48. Will there be any change in the status of Unia?
49. What measures are provided to ensure the independence of Unia, the organisation responsible for oversight, and to increase the input from those with experience-based expertise within the structure?