



EUROPEAN UNION OF THE DEAF

A European Non-Governmental Organisation in official liaison with
European Parliament, European Commission and the Council of Europe

Recommendations on how to establish targets for increasing the employment rate of deaf people and reducing employment gaps between persons with and without disabilities

Executive Summary

The employment rate of deaf people in the European Union (EU hereafter) is unjustifiably low. Not only are there a lack of statistics to measure the situation of deaf people when accessing and within employment but there is also a lack of understanding, in the EU, of the importance of national sign language-inclusive environments to ensure a fully accessible labour market for deaf people. The EU is a State Party to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). However, the European Commission's (the Commission hereafter) actions do not align with its obligations under the CRPD, and specifically, with its Article 27 on work and employment.

As the official representative organisation of all deaf people within the EU, the European Union of the Deaf (EUD) has the mandate to guide the EU in crafting policies implementing the CRPD that are beneficial to deaf people. This paper aims to put a spotlight on the lack of disaggregated data on the access of deaf people to employment and the necessity to design targets increasing their employment rate.

The first part of the paper addresses the “**what**” in terms of the issue at hand – the employment rate of deaf people in the EU remaining low. It highlights the difference between “employment targets” and “indicators” and then outlines the legal and policy instruments obliging the Commission to establish employment targets supporting the inclusion of deaf people in the labour market. Following this, the situation of deaf people accessing employment is explained through the absence of data measuring their inclusion in the labour market. Moreover, the paper highlights that an inclusive labour market for deaf people is reached through national sign language-inclusive work environments. The second part of the paper deals with the “**why**” by providing an outline of the role targets play in bridging the gap in the access of deaf people to the labour market. Thirdly, the paper looks at the “**how**” in terms of how the Commission can set effective targets using the EU's Social Scoreboard as a tool to achieve the inclusion of deaf people in the labour market.

Lastly, after researching and consulting several EU and international policy and legislative frameworks, as well as any available EU level statistics on employment in general, EUD has identified the following policy recommendations for the Commission's development of effective targets to increase the employment rate of deaf people:

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- **Improve and increase data collection efforts on the number of deaf people disaggregated by their intersecting identities in employment**, by utilising the EU Semester Process, in support of the European Pillar of Social Rights;
- **Revise the Social Scoreboard to include indicators disaggregated by disability group, including deaf people, reflecting their intersecting identities** alongside their disability, including racial or ethnic origin, languages, gender identity, socio-economic status, sexual orientation, age and any other layers of identities, in line with its commitment under the EU Disability Rights Strategy 2021-2030 to set new indicators;
- **Design specific policies towards ensuring inclusive national sign languages labour environments for deaf people**, in line with Article 27 CRPD and its General Comment n°8 to complement the establishment of the employment targets.
- **Continually monitor the progress made by the employment targets on the number of deaf people in employment**, using its obligations with the CRPD as a guide, through meaningful consultation EUD at the EU level and their National Associations of the Deaf at the national levels.

Accordingly, EUD calls the Commission to implement its recommendations without delay. Only then will the EU take a step closer to achieving its goal of becoming a 'Union of Equality'.

1. Introduction

Access of deaf people to the open and inclusive labour markets is a fundamental human right outlined in several international convention and treaties, and European legislation. The empowerment through employment, self-employment or entrepreneurship is essential for the full and active participation of deaf people in their society and economy. However, their presence in the employment sector within the European Union (EU) remains low.

Given the specific cultural and linguistic identity of deaf people as national sign language users and persons with disabilities¹, inclusion in the labour market can only be reached if deaf people receive opportunities to access national sign language inclusive work environments. Indeed, *"To fully exercise their linguistic human rights to participate in and contribute to the labour market, the accessibility and inclusion of the labour market itself through national sign languages must be guaranteed."*² This refers to all aspects of engagement with the labour market, in line with Article 27 of the United Nations Convention on the Rights of Persons with Disabilities (CRPD), from the recruitment process and training into the work life, professional development, and the use of their collective rights (right to strike and to be part of a union).

In August 2022, EUD published its [Policy Recommendations on Access to Labour Market for Deaf Persons in the EU](#) highlighting the specific challenges deaf people are facing in the EU to accessing fair and inclusive labour markets in line with Article 27 of the CRPD alongside the CRPD Committee's General Comment Number 8 on the Rights of Persons with Disabilities to Work and Employment.³ This paper also provided recommendations on how to overcome these barriers and mitigate the marginalisation of deaf people in accessing the labour market. The European Commission has committed to several international and European legislations and policies to foster the inclusion of persons with disabilities, including deaf people in the open labour market.

However, despite the Commission's legal obligations and policy commitments, the reality faced by deaf people when accessing the open labour market is not in line with the standards set in these instruments.

After establishing an overview of the existing legal obligations and political commitments imparted to the European Commission, the present paper will establish an assessment on the number of deaf people in age of working. Then, the paper will make a brief overview of the criteria to reach inclusive national sign language environments, enabling deaf people to fully contribute to the economic growth of

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their society. The paper will guide the Commission, by providing concrete recommendations, on how it can utilise its pre-existing instruments to set effective employment targets increasing the employment rate of deaf people in the EU.

2. Targets or Indicators: an explanation

Before going further in this paper, it is crucial to define several concepts. The first one is “targets” as in “employment targets”. This refers to quantifiable objectives that must be reached at the EU level to ensure an increase in the employment rate of deaf people. For example, if the EU target is to implement a legislation promoting the participation of deaf people, indicators should provide information on the exact number of deaf people looking for employment, the barriers faced with regards to the recruitment process, and/or further information on the hiring process.

Example of targets:

1. *Target increasing the employment of deaf people:* A target could be to achieve a specific percentage increase over a certain number of years. For example, a target might be to increase deaf employment by 10% within the next five years.
2. *Target increasing accessibility standard:* Setting a target for all workplaces within the EU to meet specific accessibility standards, such as ensuring the availability of national sign language environments and national sign language interpreters.
3. *Target increasing Education and Training:* Establishing targets for the number of deaf people receiving relevant education and training programs to enhance their employability and skills.

The second concept is “indicators”. Indicators refers to measurable criteria that are set as part of the data collection process. They are used to evaluate progress in the achievement of set goals. In this paper, as the focus is on increasing the employment rate of deaf people in the EU, an example of an indicator set to evaluate progress the achievement of this goal is the “employment rate of deaf people”. Furthermore, indicators on employment are needed to provide data and accurate information on what must be changed to achieve and set specific employment targets.

Example of indicators to measure deaf people’ access to labour markets

Examples of indicators that promote the establishment of clear targets for the employment of deaf people include:

1. *Indicators on unemployment rate of deaf people:* This indicator measures the percentage of deaf people who are currently unemployed compared to the total employed population in the EU. A decrease in this rate would signify progress.
2. *Indicators on job placement rates:* Track the percentage of deaf people who have successfully secured employment within a specific timeframe after seeking a job. It reflects the effectiveness of employment programs and services.
3. *Indicators on training and development participation:* research the participation of deaf employees in training, workshops, or professional development programs.
4. *Indicators on Employer Accessibility:* it assesses the accessibility of workplaces for deaf people through the national sign language.

3. The legal and policy instruments obliging the Commission to establish employment targets to support the inclusion of deaf people in the labour market

The Commission is bound by a number European and International policies and legislation. These policies include:

The CRPD, specifically its articles 27 and 31 - the former reaffirms the fundamental rights of deaf people to accessing fair and inclusive labour markets. Fair and inclusive labour markets for deaf people mean national sign language inclusive labour markets. This has been reaffirmed by both the CRPD General Comment no.8 and the EUD Policy Recommendation on Access to Labour Market of Deaf Persons in the EU. Inclusive national sign language labour markets refer to work environments where deaf people are able to freely use their national sign language as their work language and language of communication. Article 31 highlights the obligation of States Parties to the Convention, including the EU, to undertake data collection disaggregated by disabilities to formulate and implement relevant policies giving effect to the Convention. Data helps State Parties to identify and address the barriers faced by persons with disabilities in exercising their rights, including their rights to fair and inclusive labour market.

Then, comes [The European Pillar of Social Rights](#) (EPSR). The EPSR is a set of 20 key principles and rights designed to foster social fairness and well-being across the EU with a corresponding [Action Plan](#) which sets out concrete initiatives to turn it into reality. It proposes headline targets for the EU by 2030. Established in 2017, the Pillar aims to serve as a guiding framework for EU institutions and Member States to promote equal opportunities, fair working conditions, and social inclusion. Covering areas ranging from education and employment to social protection and healthcare, the EPSR seeks to ensure that the benefits of the EU's economic growth are broadly shared among all citizens, including deaf people. It provides a roadmap for implementing social and employment policies that are geared toward achieving a more inclusive, equitable, and socially cohesive EU.

Specifically, its Principle 17 on the 'Inclusion of Persons with Disabilities' is a crucial policy tool to promote the setting of employment targets that foster the inclusion of deaf people in the labour market. This Principle put an emphasis on the inclusion of persons with disabilities, serving as momentum to design policies addressing the employment gap between deaf people and their hearing counterparts. Moreover, other relevant Principles include Principle 3 covering 'Equal Opportunities' – which mentions the right to equal opportunities regarding employment; Principle 4 on 'Active Support to Employment'; Principle 5 on 'Secure and Adaptable Employment' stating that “*workers have the right to fair and equal treatment regarding working conditions, access to social protection and training*”⁴; and Principle 10 on 'Healthy, Safe and Well-adapted Work Environment and Data Protection' states that “*Workers have the right to a working environment adapted to their professional needs and which enables them to prolong their participation in the labour market.*”⁵

[The European Strategy on the Rights of Persons with Disabilities 2021 – 2030](#) is a Strategy established by the Commission to mainstream disability policies and tackle the numerous barriers persons with disabilities encounter in their participation in society. Within the Strategy, the Commission committed to “**develop, at the latest by 2023, new disability indicators with a clear roadmap for implementation. These should include indicators for children and the situation of persons with disabilities in employment, education, social protection, poverty and social exclusion, living conditions, health, use of new communication technologies, supporting the indicators for the EU Social Scoreboard, the European Semester and the Sustainable Development Goals**”.⁶ Accordingly, it is part of the Commission's plan to improve its data collection efforts by developing more effective indicators.

The Strategy has several priorities and flagship initiatives, one of which is the [Disability Employment Package](#) – a set of political guidelines and a collection of good practices supporting EU Member States in designing tailored policies to increase the inclusion of persons with disabilities, including deaf people,

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in the open labour market and within a fair green digital transition. As only half of the 42.8 million persons with disabilities are of working age, it is one of the EPSR Action Plan's [2030 EU headline targets](#) to increase the participation of persons with disabilities in the labour market.

This Package comes with six deliverables aimed at guiding EU Member States, namely “Strengthening capacities of employment and integration services”; “Promoting hiring perspectives through affirmative action and combating stereotypes”; “Ensuring reasonable accommodation at work”; “Retaining persons with disabilities in employment: preventing disabilities associated with chronic diseases”; “Securing vocational rehabilitation schemes in case of sickness or accidents”; and “Exploring quality jobs in sheltered employment and pathways to the open labour market”.

Although EUD is an ally in achieving all objectives set in the EU Disability Strategy 2021-2030 and welcomes the Disability Employment Package, we deplore the medical-based approach that is taken by the European Commission in some of the deliverables. For example, in the deliverables “Retaining persons with disabilities in employment: preventing disabilities associated with chronic diseases” and “securing vocational rehabilitation schemes in case of sickness or accidents”, little accent is put on the actual barriers faced by persons with disabilities, and how to address the stigma associated with accessing the labour markets.

The European Disability Strategy and its Disability Employment Package should serve as a roadmap to ensure the access of all deaf people in the open and labour market through the use of their national sign languages. However, as outlined in the [EUD Findings on the available data on the number of deaf people at the national level](#), data on the number of deaf people accessing employment in the EU is non-existent at both the EU and national levels. Accordingly, the Strategy must bring the much-needed impetus to design targets increasing the inclusion of deaf people in the labour market coupled with indicators which periodically measure the achievement of this goal. The data produced by these indicators can then be used to design tailored deaf-related employment policies.

[The European Semester Process](#) is the Commission’s annual framework for coordinating economic and social policies across the EU. However, disability is mentioned only twice in the EU Semester Spring Package for 2022, with one of the mentions being in relation to employment: *“In the context of labour shortages and persistent employment gaps, increasing the labour market participation of women, including by enhancing access to early childhood education and care, and underrepresented groups, such as persons with disabilities, migrants and the Roma, still represents a major opportunity for inclusive and sustainable growth and equality.”*⁷ This reflects the lack of attention given to the barriers faced by deaf people, with regards to accessing the labour market.

Every year, under the EU Semester Process, the Commission initiates the cycle by outlining overarching priorities in the Annual Sustainable Growth Strategy, which offers the opportunity to include goals and targets related to social inclusion of persons with disabilities, including deaf people. Then, Member States submit their draft budgetary plans and National Reform Programmes, offering an opportunity to integrate the recommended disability and deaf-related objectives. These plans are reviewed by the Commission, resulting in Country-Specific Recommendations (CSRs). The CSRs are an opportunity for the Commission to establish recommendations for Member States on enhancing the inclusion and accessibility of deaf people in the labour market.

4. Current situation of deaf people accessing employment

a) Data of the number of people working & looking how many people are working in the EU

In 2022, the number of employed people aged 20 – 64 years in the EU amounted to 193 458 000⁸ out of the total EU population of 448,4 million⁹. Such number accounts for 74.6% of people in the

same age group¹⁰ and confirm the increasing trend of employed people since the Covid-19 pandemic in 2020¹¹.

Despite the commitment to promote inclusive employment, as set in the European Pillar of Social Rights Action Plan, there are some elements that contribute to significant differences concerning the data about employed people. These include:

- **Gender:** the employment rate across the EU for men is 80% while for women only 69.3%¹².
- **Age:** young men aged 15 – 24 years had an employment rate of 37.0%, the same data for their female counterpart stopped at 32.3%. In regards of senior workers, the rate of employed 55 – 64 years men of 68.7% and 55 – 64 years women of 56.2%¹³.
- **Education:** In 2022, individuals between the ages of 20 and 64 who had achieved a high level of education enjoyed an employment rate of 86.0%, significantly surpassing the rate of those who had solely accomplished a minimal level of education, standing at 57.2%¹⁴.

b) Data on the number of persons with disabilities in employment

Within the intersectional aspects that impact on the data of employed people in working age, it is necessary also to include disability. According to 2022 a European Disability Expertise (EDE) Report on “The Employment of Persons with Disabilities”, in the EU:

- there are around 47.2 million people aged 16 – 64 with a declared disability.
- persons with disabilities are 17.2% of the whole population of the same age¹⁵.
- Among persons with disabilities, about 35.2 million persons declared a moderate disability (12.8% of the population), while 12.0 million persons have a severe disability (4.4% of the population).

Despite EU’s political commitments found within as the European Strategy for the Rights of Persons with Disabilities 2021 – 2030 and as its being a State Party to the CRPD, the disability employment gap of persons with disabilities remains significant in the EU. According to the available data, in 2020:

- About 50.7% of persons with disabilities aged 20 – 64 were employed compared to 75.1% of persons without disabilities¹⁶.
- The disability employment gap percentage stands at 24.4%, with further differences when considering other intersectional aspects such as gender and degree of disability.
- Only 48.1% of women with disabilities aged 20 – 64 are employed in comparison to 53.7% of men with disabilities in the same age range¹⁷.
- Among persons with disabilities, the employment percentage differ considerably. The employment rate vary accordingly: 29.6% for those with severe disabilities, 58.3% for those with moderate disabilities, and 75.7% for those without disabilities¹⁸.

c) Absence of data measuring the inclusion of deaf people in the labour market

The previously mentioned data on the employment of persons with disabilities represents a too vague and general overview of the situation and does not reflect the specific situation of deaf people. This is further highlighted in the EUD report on [“Finding and results of the survey on the available data related to deaf people at national level”](#).

Without comprehensive evidence, it is challenging to implement effective policies and initiatives increasing the employment rate for deaf people. Given the fact that there are no available data on the

number of deaf people in the EU, nor on their employability, EUD is left with no choices than establishing its own number of deaf people, based on its mandate of representing all deaf people in the EU through their National Associations of the Deaf. Taking evidence on existing academic research conducted by Dr Maya de Wit¹⁹, the number of deaf people in the EU is approximatively 1 million.

This represents 0,2% on the totality of the EU population of 448,4 million; if applied to the number of people in working age within the EU, the number of deaf people in working age should be 386 916. However, there are no data on the percentage of this number that are included in the labour market.

d) Inclusive employment for deaf people through inclusive sign language working environments

The full inclusion of deaf people in the labour market can only be reached through national sign language inclusive working environments. This is reached by:

1. Implementing an EU anti-discrimination legal framework that safeguards deaf people's access to the labour market and that ensure their right to use their national sign languages within their workplace.
2. The provision of government-funded professional and accredited national sign language interpretation in work settings as well as the teaching of national sign language to staff members to ensure accessible communication and information exchange.
3. The integration of deaf-inclusive employment policies into the legislative and program development processes, commencing from the initial design phase and continuing through the monitoring stage.
4. The collection of disaggregated data concerning the access of deaf people to the labour market, with a particular focus on other intersectional identity minorities at both the EU and national levels, in collaboration with the National Associations of the Deaf (NADs).

5. Purpose of the targets: bridging the gap in the access of deaf people to the labour market

The data from the preceding section highlight the lack of availability of official statistics on the number of deaf people active in the labour market in the EU. This lack of availability is caused by a lack of specific targets measuring the inclusion of deaf people in the labour market at both the EU and national levels.

The need for specific targets increasing the employment rate of deaf people and reducing employment gaps between deaf people and their hearing counterparts. First and foremost, these targets serve as a policy mechanism to implement the CRPD and its obligations to remove all barriers to access every area of society, including in fair and deaf-inclusive labour markets. This also includes the removal of any existing discriminatory measures on the ground of disability and language use.

Secondly, setting targets on the employment rate of deaf people in different sectors will highlight areas where they are particularly underrepresented. This underrepresentation is the result of either the absence of policies addressing the challenges of deaf people in accessing a fair and inclusive labour market in their national sign language, or existing policies that are not adequate and require revision.

Thus, the targets would make possible the design of evidence-based policies tailored to bridge the gap in the inclusion of deaf people in the labour market and reduce the discrimination they encounter. It will act as a catalyst pushing for systemic change in employment practices for deaf people.

Ultimately, the establishment of these targets will also allow regular monitoring and evaluation of progress by both the European Union and the National Associations of the Deaf to hold the EU Member States accountable. It will make it easier to identify successes and shortcomings in policy implementation and adjust accordingly to best address the systemic barriers hindering equal opportunities for deaf people.

6. The EU's Social Scoreboard as a catalyst to set employment targets for the inclusion of deaf people in the labour market by the Commission

Alongside the EPSR, the Commission put forward a [Social Scoreboard](#) with 12 headline indicators to monitor progress with regards to the Pillar's implementation. The indicators of the Social Scoreboard can also be used in the EU Semester process. According to the Commission, the principles established in the Pillar will be evaluated as part of the future European Semester cycles. Although the Social Scoreboard does not cover all 20 principles of the Pillar, it has the potential to be a key tool for reinforcing the social dimension of the EU Semester process by providing specific social indicators and data on persons with disabilities and deaf people.

The Social Scoreboard includes indicators such as 'risk of poverty or social exclusion'; 'early school-leavers'; 'income inequality'; 'unemployment rate'; 'youth unemployment rate'; 'gender employment gap', among others. More recently, in 2021, an indicator titled "disability employment gap" was added to the Social Scoreboard under the section "Social Protection and Inclusion". The data collected via this scoreboard, based on its set list of indicators, can then be used to support the establishment and achievement of certain employment targets, at the EU level, including targets to improve the labour market access for deaf people. Therefore, the Social Scoreboard has the potential to see specific indicators on the inclusion of deaf people and national sign language users in the labour market.

However, both at national and EU level, there is a lack of disaggregated data on deaf people representing their intersecting identities such as racial or ethnic origin, languages, gender identity, disabilities, socio-economic status, sexual orientation, age and any other layers of identities in all areas of life. Currently, any data that does exist on deaf people does not consider the intersecting identities. In addition, any data that is collected is often characterised by a medical approach which, contrary to the human rights approach taken in the CRPD, reflects the percentage of hearing loss without establishing the full picture of their barriers and challenges when, in this instance, accessing the labour market.

Not only does the Social Scoreboard not disaggregate by disability in its indicator on the disability employment gap, but it also does not take into consideration the intersecting identities. Indeed, recent statistics show that only 50.8% of persons with disabilities are employed, compared to 75% of persons without disabilities and the situation is even worse for women with disabilities - on average only 48.3% of women with disabilities are in employment.²⁰ Although, in the Social Scoreboard, factors such as disability, gender, age and socio-economic situation appear within the indicators, the indicators are siloed. For instance, there is an indicator on the 'disability employment gap' and, separately, for the 'gender employment gap'. Each intersecting identity represents a different version of outcomes in relation to employment. For instance, a deaf woman who is part of the LGBTQIA+ community will have unique experiences when it comes to accessing the labour market, in comparison to, for example, a deaf BIPOC man.

Thus, the indicators within the Social Scoreboard are too generalised to utilise the data collected to develop effective EU targets closing the employment gap between deaf people and their hearing counterparts. Indeed, the only indicator with direct relation to persons with disabilities, does not disaggregate by disability, meaning it cannot provide data about deaf people specifically, within and seeking employment. Consequently, this results in a lack of targeted policies and measures to address the specific challenges faced by deaf people and sign language users when accessing the labour market. What's more, although Eurostat provides survey data for key areas, existing data collection does not yet cover all relevant areas and is not always frequent enough to identify trends.²¹

7. The European Commission's responsibility to establish specific and targeted indicators

In this way, the Commission has committed to improve its data collection methods in the form of new disability indicators on employment and, in turn, support the work of the European Semester. Therefore, this presents the perfect opportunity for the Commission to further review the Social Scoreboard in line with the recommendations in the previous section. Once the Commission has developed these indicators, the data collected can be used to both set more effective employment targets and achieve these. This would constitute a significant step in the EU's promotion of the inclusion of deaf people in the open labour market.

Further to this, the Commission must be mindful of Article 27 CPRD in terms of measuring the access of deaf people to employment from the recruitment phase onwards – *“with regards to all matters concerning all forms of employment, including: conditions of recruitment, hiring and employment, continuance of employment...”*.²² Indeed, deaf people experience barriers to their accessibility in all stages which must be understood better to find solutions and measures to combat these.

Accordingly, the EU Semester Process is a direct way in which the EU can progress their data collection methods to ensure they are also measuring the employment rate of deaf people, with consideration of their multiple and intersecting identities. Furthermore, if the Commission further revised the indicators of the Social Scoreboard, in line with its commitment within the EU Disability Strategy, as described in the previous section of this paper, the data collected would be highly useful for the Commission to use to develop its CSRs for each Member State. Ultimately, the disaggregated data would lead to more specific and targeted CSRs for Member States and, as a result, more effective employment targets to close the employment gap between deaf people and their hearing counterparts.

8. Recommendations to the European Commission

This paper is a guideline for the Commission to be better equipped when establishing employment targets for the inclusion of deaf people in the open labour market. To establish effective employment targets to promote the inclusion of deaf people in the open labour market, and to reduce the employment gap between deaf people and their hearing counterparts, EUD makes the following policy recommendations to the Commission:

- **Improve and increase data collection efforts on the number of deaf people disaggregated by their intersecting identities in employment**, by utilising the EU Semester Process, in support of the European Pillar of Social Rights;
- **Revise the Social Scoreboard to include indicators disaggregated by disability group, including deaf people, reflecting their intersecting identities** alongside their disability, including racial or ethnic origin, languages, gender identity, socio-economic status, sexual orientation, age and any other layers of identities, in line with its commitment under the EU Disability Rights Strategy 2021-2030 to set new indicators;

- **Design specific policies towards ensuring inclusive national sign languages labour environments for deaf people**, in line with Article 27 CRPD and its General Comment n°8 to complement the establishment of the employment targets.
- **Continually monitor the progress made by the employment targets on the number of deaf people in employment**, using its obligations with the CPRD as a guide, through meaningful consultation EUD at the EU level and their National Associations of the Deaf at the national levels.

9. Conclusion

The access of deaf people to the open and inclusive labour market is a fundamental right enshrined in several international and European legislation and policies. However, its practical implementation is challenging to measure due to the lack of official data on the number of deaf people in the labour market coupled with the absence of any specific targets and indicators tackling this specific challenge.

Therefore, the European Union of the Deaf strongly believes in and advocates for the importance of collecting quality, accurate and reliable data on deaf people through a set of specific indicators and targets measuring their inclusion in the labour market.

The purpose of this data collection is twofold. Firstly, it will support NADs and their governments as well as the European Commission to have an overview of the situation, challenges and opportunities faced by deaf people in accessing the labour market as well as other economic, social and educational areas. Secondly, it serves as a tool for policymakers to address the challenges their deaf communities face at the national and European levels by providing tailored evidence and guidance to design relevant, targeted policies. Collecting data disaggregated by disabilities as well as the various intersecting identities of deaf people would also serve for the European Commission to meaningfully implement both the CRPD, the EU Disability Rights Strategy and the EPSR.

The Commission has several tools and mechanisms at its disposal to disaggregate data by disability as well as by intersectional identity to close the existing gap between deaf people and their hearing counterparts in accessing the labour market.

While drafting Country Reports and Country-specific recommendation during the European Semester Process, the Commission can focus on the principles of the Social Pillar. This is where NADs can provide input, data, information and arguments that highlight specific challenges that deaf people face in accessing fair and inclusive labour market at the national level through EUD. It will bring the EU closer to the realities faced by the approximately 386 916 deaf people in age of working, constituting the working European deaf community.

As outlined in this paper, the setting of specific indicators, disaggregated by disability, including deaf people, and accounting for intersecting identities, is an essential step to take before the establishment of employment targets to promote the inclusion of deaf people in the open labour market and finally reach an Union of Equality for everyone, including deaf people

10. Annex

- The EU Employment Equality Directive 2000/78/EC: prohibits discrimination on grounds of religion and belief, age, disability and sexual orientation. It covers the fields of:
 - employment & occupation
 - vocational training
 - membership of employer and employee organisations

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Both the EU and Member States are involved in the full implementation of the requirements under this Directive as the legislation itself sets out minimum requirements, however Member States may provide for a higher level of protection against discrimination in national legislation.

In this way, the Directive provides a baseline for certain standards to be applied within the employment sector, in terms of ensuring there is no discrimination. However, it is up to the Member States to not only implement measures to fit with the baseline, but also take these further to ensure full protection of, for instance, persons with disabilities, in the labour market. All the Member States have now transposed the Directive into national law.

The Commission monitors any issues with the implementation of the Directive at national level, and one obstacle appears to be the divergence with the definition of discrimination. In order for robust employment targets to be set, such definitions must be clear at Member State and EU level. It is also important for clear and standardised definitions of reasonable accommodation and accessibility to be understood. As the EU is a State Party to the CRPD, such definitions should be taken from the Convention.

Article 4 - Allows for some justified exceptions to the prohibition of unequal treatment on four grounds: religion and belief, age, disability and sexual orientation.

Reasonable Accommodation of persons with disabilities - Article 5 of the Directive provides that employers are required to take appropriate measures to enable a person with a disability to have access to, participate in, or advance in employment, or to undergo training, unless such measures would impose a disproportionate burden on the employer.

- The EU Employment Guidelines: proposed by the Commission and approved by the Council, present common priorities and targets for the national employment policies. Specifically, the Guidelines frame the scope and direction for Member States' policy coordination and provide the basis for Country Specific Recommendations.

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