
**European Social Network's (ESN)
response to the European
Commission's Public Consultation on
Enhancing the Strategy of the rights of
persons with disabilities up to 2030.**

About the European Social Network

The European Social Network ([ESN](#)) represents public social services across Europe, including employers, managers, funders, planners, providers and inspectors. ESN inspires social services leaders to improve the lives of people in the community through the development and exchange of knowledge that strengthens policy and practice in public social services. ESN's members deliver and oversee a wide range of services, including community-based support and protection for people with disabilities, care and support for older people, child protection, homelessness services, and measures addressing poverty, social exclusion and socio-economic disadvantages.

Background

The current [EU Strategy for the Rights of Persons with Disabilities](#), started in 2021 and it set to be achieved by 2030. As we are in the middle of its implementation the EU requires feedback from interested stakeholders on its current course and potential ideas for further actions to move forward.

The current strategy included the following flagship initiatives:

1. Accessible EU
2. European Disability Card
3. Guidance recommending improvements on independent living and inclusion in the community
4. A framework for social services of excellence
5. A package to improve labour market outcomes of persons with disabilities
6. Disability Platform
7. Renewed HR Strategy

Its implementation is monitored by the [EU disability platform](#), of which ESN is a member of. ESN recognises the added value of the disability platform and encourages its maintenance as central entity to follow the implementation of the strategy as joint undertaking between the European Commission, its member states and organisations representing and providing services to people with disabilities.

ESN welcomes the European Commission's commitment to enhancing the [Strategy for the Rights of Persons with Disabilities up to 2030](#). This paper sets out ESN's recommendations for an updated strategy that ensures a comprehensive, person-centred and community-based approach to social services, with a focus on improving inclusion and quality of life for people with disabilities.

ESN members play a central role in implementing disability policies through the development of related social services programmes at national, regional, and local levels. To ensure this response reflects their experiences and priorities, ESN

gathered input from service providers and public administrations across Europe through a questionnaire. This input enabled ESN to present a coherent and representative position on the future direction of the Strategy.

Awareness, Visibility and Dissemination

The EU Disability Strategy has so far resulted in several impactful flagship initiatives. However, the visibility and dissemination remain limited, particularly at local and regional levels. Many ESN members reported low awareness of initiatives introduced in recent years, including [guidance on independent living and community inclusion](#), the [Disability Employment Package](#), [AccessibleEU](#), the [European Accessibility Act](#) and the [Web Accessibility Directive](#).

While all respondents were familiar with the EU Strategy for the Rights of Persons with Disabilities, many were unaware of its specific flagship initiatives and practical recommendations.

An ESN member from a Spanish local public authority noted that:

“Although the Strategy is widely recognised, we lack concrete guidance for implementation within each priority area.”

ESN therefore calls on the European Commission and EU Member States to significantly strengthen promotion and dissemination of its initiatives, with a particular focus on local and regional authorities responsible for implementation. This should include **clearer, more practical implementation guidance for Member States with clarity regarding specific responsibilities at national, regional and local levels.**

A national public administration in Latvia highlighted the added value, when available, of common guidelines and co-financing for awareness raising activities outside Brussels, for **shared actions between European and national authorities in relation to the International Day of Persons with Disabilities.**

Investing in Public Social Services to Deliver the Strategy

Public social services play a central role in translating EU and national disability strategies into practice. To strengthen implementation, the next Multiannual Financial Framework ([MFF](#)) for 2028–2034 must ensure strong alignment with the disability strategy and the [EPSR new action plan](#) and be **designed in partnership with national, regional and local management authorities (MAs)** responsible for social inclusion programmes. Funding, particularly through the [ESF+](#), should support not only active inclusion but also community- and social inclusion services for people with disabilities, including in rural areas that are often left excluded.

To ensure effective use of EU funds, **social services must be systematically involved in programme design, implementation and funding management**.

While EU funding is vital for social services development, many services face significant barriers in accessing EU funds such as the [ESF+](#), due to complex application procedures and limited awareness or understanding of these programmes.

Application procedures should therefore be simplified, and more accessible, particularly for smaller organisations, to ensure effective implementation of the EU disability strategy. This can be achieved by providing practical and accessible resources through projects such as the [EU Help Desk- EU Funds for Social Services](#) and the upcoming 'ESF+ Social Services Hub', which produced valuable resources including [country fact sheets](#), a [facilitation toolkit](#), [policy guidance](#) and [e-training](#) to support organisations through EU funding application processes.

EU funds are a powerful tool for promoting inclusion and reducing inequalities across Europe. **They should not be used to fund institutions**. It is crucial to maintain and strengthen safeguards in the future MFF to ensure ongoing progress towards inclusive, community-based care. Thus, strong **conditionalities** must continue to apply to EU funding to prevent investment in segregated or institutional care. This requirement should be central in the upcoming MFF 2028-2034.

During the next MFF, the post 2027 Cohesion Policy legislation should ensure the continuation of horizontal enabling conditions ([Annex III](#)) of the Common Provisions Regulation ([CPR](#)) that currently require Member States to implement the [UNCRPD](#). This includes **creating national policies with clear disability-related goals around deinstitutionalisation, data collection, and monitoring systems**. Moreover, all activities funded by the EU require monitoring for compliance with the [Charter of Fundamental Rights](#). It is crucial to maintain and strengthen these safeguards in their implementation to ensure ongoing progress towards inclusive, [community-based care](#) for all people with disabilities.

Overall, ESN is [concerned that current proposals for the MFF 2028–2034 risk weakening accountability by reducing horizontal and removing thematic enabling conditions](#), including those linked to the EPSR. This would significantly undermine progress on social inclusion, disability rights, deinstitutionalisation, long-term care and child poverty. While the proposal to focus the future national partnerships on the [recommendations put forward under the European Semester](#) seems theoretically a good idea, the issue is that [those recommendations are only as good as the data they are based on. Often data for social services or social related matters broadly is limited and so are the recommendations provided](#). This means that there is a [risk that funding steaming from these recommendations will also be low](#). While the European

Social Network has been trying to address this issue through the [European Social Services Index](#) (addressed further down), the truth is that the number of relevant EU recommendations has been low.

ESN therefore calls on EU institutions and Member States to **reinstate thematic enabling conditions linked to the EPSR, link social spending to measurable outcomes, and prioritise community- and family-based care**. This should be accompanied by a well-funded ESF+, continued support for EU-level cooperation and mutual learning, investment in the modernisation of social services and workforce development, and the establishment of a [care guarantee](#) ensuring access to high-quality social services for all those who need it at a particular stage in their lives.

To ensure EU funded social inclusion programmes and projects are meeting local needs, it is crucial to involve local and regional authorities and social services' representatives in the needs assessment, planning and design of those programmes. In this context we highlight the central role of the partnership principle. The partnership principle requires national, regional and local authorities, civil society organisations, social and economic partners, research bodies and universities to be involved in the funding and programming process. By requiring coordination among these partners across planning, programming, implementation, monitoring, and evaluation of EU funded activities, it makes them more effective.

Towards an Action Plan on Community Care

ESN advocates for the introduction of a [European Care Guarantee](#), recognising the right of all people in need to access quality, affordable, person-centred care and support, regardless of age, ability or socio-economic status. This guarantee should ensure that public social services are equipped to provide care across the life course, acknowledging that anyone may require support, or become disabled, at any stage of life. In 2023, the [Council of the EU](#) invited member states to 'recognise the individual right to be cared for, under equal conditions, promoting reforms, (...) that holistically define and ensure the right to sufficient, appropriate and affordable high-quality, person-centred and community-based care'. In a recent questionnaire, ESN members emphasised that independent living and community inclusion must remain a top priority for the next stage of the Disability Strategy.

ESN members agree that independent living and community inclusion are areas in which the situation of people with disabilities has somewhat improved over the past five years. ESN welcomes the publication of the Commission's [Guidance on Independent Living for Persons with Disabilities](#) as a key step to present ways in which those working with people with disabilities can ensure that they are included in our communities and actively participate in our societies. To

strengthen this progress, ESN urges the European Commission to prioritise person-centred, community-based social services in public funding, ensuring that resources are no longer directed towards institutional care. Therefore, we would like to request the European Commission **promotes the 'EU Knowledge Exchange in Deinstitutionalisation Practice'**, proposed by the European Expert Group on the transition from institutional to community-based care ([EEG](#)) - connecting those who implement deinstitutionalisation across different countries to help learn from their experience, improve their practice, and make their know-how available to more countries and those working on community care.

Access to care and support, however, remains uneven across the EU. Closing institutions alone is insufficient: alternative, [community-based services](#) must be in place to prevent default institutionalisation. Evidence shows that community-based care is both effective and economically viable when designed to meet individual needs and quality standards.

ESN members stress that **deinstitutionalisation requires a formal EU strategy or action plan**, with reinvestment of funding into community-based services. Those responsible for funding, planning, and delivering social services must be involved, as they are central to effective implementation. Community-based services for people with disabilities, including personalised support, home assistance also in the form of technology-based support, supported independent living, rehabilitation, day care and support services, employment support, and personal assistance are essential to promote autonomy, social participation and inclusion.

Overall, ESN calls for stronger EU-level **leadership to make independent living a reality for all** people with disabilities. This requires coordinated policies, adequate funding, and a clear commitment to deinstitutionalisation and the development of high-quality, community-based care. This could consist of initiatives that promote access to community care across all population groups, such as **a European Commission coordinator for community care, a cross-DG Working Group on the transition to community care and an advisory group to the European Commission on community care**. All actions must be coordinated with the European Commission and EU member states, working alongside other initiatives including the [EU Anti-poverty Strategy](#), the [EU Strategy for the rights of the child](#) and the [EU Care strategy](#). These strategies should jointly promote the transition to community-based care and support services.

Ensure Quality in Social Services

While the European Commission expressed its desire to propose a Framework for Social Services of Excellence for persons with disabilities, **ESN recommends first proposing a revamped European quality framework for social services**, followed by more specific frameworks aligned with it, including one focused on disability. This is essential to ensure coherence, avoid fragmentation and embed disability

services within a broader, rights-based social services system. The European Social Network has been [working for the past four years](#) on a reviewed proposal of a European Social Services Quality Framework, which is based on six key principles for quality social services: Human Rights-based, Person-centred, Outcomes-oriented, Safe, Community-based and Well-led.

We have requested the European Commission to produce a reviewed version of the [2010 Voluntary Framework for Quality in Social Services](#), in coordination with the [Social Protection Committee](#) (SPC), social services authorities and providers, and representatives of service users. The current framework has had limited uptake and visibility; however, public authorities in many countries are now reviewing their quality assurance processes across all governance levels, over 15 years later. As such, a revised, practice-oriented EU framework could therefore provide timely and effective guidance. The European Commission can use the [framework](#) provided by ESN to do so.

High-quality disability services must be grounded in [UNCRPD](#) principles to allow for person-centred, [co-produced](#) and community based social services for people with disabilities.

Quality frameworks should be accompanied by practical implementation support. This includes **dedicated EU funding to pilot, test and implement quality standards**. The European Commission should launch a [social innovation](#) call to test quality frameworks locally and make the **Social Services Quality Framework a flagship initiative** across its anti-poverty and disability strategies.

Likewise, this should be accompanied by targeted [ESF+](#) funding to support the transition to community-based care, workforce training, skills development and improved working conditions in social services.

Access to the Open Labour Market

ESN members consistently identify employment as one of the most significant challenges facing people with disabilities. In the recent questionnaire, 80% of respondents highlighted work and employment as the greatest challenge for people with disabilities in their countries, revealing an urgent priority area for action for the next stage of the EU Disability Strategy.

ESN promotes an [inclusive activation](#) approach in which social services play a leading role in integrated efforts to support people furthest from the labour market, including people with disabilities, into employment. This approach is based on a holistic and intersectional perspective, recognising that access to employment depends not only on skills and qualifications, but also on adequate support across social, health, education, housing and employment services. It builds on ESN's previous work, including the [Realising Potential report](#) and the

2019 Toolkit on Inclusive Activation, and is informed by practical examples from ESN members across Europe.

Public employment services are not always best placed to support people with multiple and complex needs into employment. Social services, which work closely with these individuals, are often better positioned to lead such employment approaches, particularly for people with disabilities. At a previous ESN seminar, for example, a self-advocate working for an organisation defending the rights of people with disabilities in Austria described how social services and a personalised plan helped him overcome the barriers he had faced for years in accessing employment.

The inclusive activation approach is built around six pillars: integrated services; adequate income support; personalised planning; holistic assessment of needs; inclusive labour markets; and access to quality services. Across EU countries, social services therefore play a central role in supporting people with disabilities to enter and remain in the open labour market.

Effective labour market inclusion depends on strong cross-sector and multi-level cooperation. Improved coordination between local, regional and national authorities, employment services and social services is essential to ensure coherence, continuity and sustainability of support. An example from Latvia illustrates this approach, where the State Employment Agency provides targeted measures for persons with disabilities, including vocational assessments, mentoring, skills development, subsidised employment and temporary public work, in close cooperation and with local social services to align employment support with individual social and health needs. In summary, social services can act as lead of active inclusion programmes with the populations with whom they closely work, such as persons with disabilities, and as key partners in multi-sector programmes, ensuring that approaches led by other agencies also integrate social inclusion elements.

All ESN members who contributed to our questionnaire endorsed the inclusive activation approach.

A Latvian national public authority emphasised that:

“Sustainable employment often requires addressing complex social and health-related barriers alongside skills development.”

A service provider in Malta highlighted the effectiveness of training in open labour market settings, supported by job coaches or work buddies, to promote integration, job retention and long-term success.

Protect Children from Vulnerable Backgrounds

The strategy should **include targeted actions to promote integrated, community-based programmes for children with disabilities**. Across Europe, public social services play a critical role in supporting children and families across education, health, social care and child protection systems to be addressed through the Disability Strategy and for the European Child Guarantee to place a stronger focus on children from vulnerable backgrounds, in particular children with disabilities and children in alternative care. This is strongly supported by ESN members: 80% identified children with disabilities and their families as a priority group for the next phase of the EU Disability Strategy.

The strategy should adopt a targeted approach to children with disabilities, ensuring that both they and their parents receive adequate support through mobile outreach, specialist parenting support and tailored training. These prevention and early intervention measures enable timely support for children with disabilities, reduce the additional stress that disability can place on parenting, and act as a preventative measure within child protection systems.

Romania offers an illustrative example, where the General Directorate of Social Assistance and Child Protection of the Arad City Council has taken significant steps to prevent family separation of children with intellectual disabilities and to strengthen the capacities of both children and their families through coordinated and specialised support, thereby improving quality of life and promoting social inclusion.

ESN therefore calls for increased investment in the most vulnerable children, particularly those involved in child protection systems, through **comprehensive and collaborative partnerships between public authorities responsible for child welfare**. At European level, strengthening coordination between the European Child Guarantee and disability policies is essential to promote inclusion, prevent institutionalisation and ensure equal opportunities for children with disabilities.

Access to Assistive Technology and Digitalisation

ESN recognises the significant potential of assistive technologies and artificial intelligence (AI) to promote independent living, enable remote support, and facilitate early intervention for people with disabilities. Key considerations include accessibility, affordability, co-production with professionals responsible for care and support programmes and people with disabilities, and safeguarding issues related to privacy, ethics, and safety. Notably, 80% of questionnaire respondents highlighted assistive technology and research as a key priority area for the updated Disability Strategy.

ESN calls on the European Commission to **strengthen support for the modernisation of public service delivery through technology, artificial**

intelligence and digital tools, in line with broader EU digitalisation commitments. The updated Strategy should include a dedicated flagship initiative on technological innovation, with a clear focus on how the EU will support advances that deliver high-quality, accessible and person-centred social services. This should include targeted support for the rollout of assistive technologies, such as smart sensors, digital care logs, social robotics, AI chatbots and medication dispensers to help people with disabilities and long-term care needs remain in their homes for longer.

The Disability Strategy should therefore include a **specific strand dedicated to piloting home-based technological innovations that support independent living for people with disabilities in the community**. These pilots should be embedded within broader innovations and connected to other community-based supports.

Denmark provides a relevant example, where welfare technology is a national priority. The country makes extensive use of sensors, video consultations, virtual housing support, assistive communication tools, smart home systems, robots, medication dispensers and AI-supported solutions. These technologies enhance independence, improve quality of life and free up staff time, while also requiring careful attention to implementation, data protection, legislation and ethics. Denmark, along with several other Member States, is moving rapidly on the digitalisation agenda, a pace that should be reflected in the updated EU Disability Strategy.

Overall, ESN members emphasised that technology and AI will be essential to delivering tailored, high-quality support as demographics change and the demand for social services grows. Increased EU funding, strong governance, and a clear focus on accessibility and inclusion are necessary to ensure that [digitalisation strengthens social services](#) and benefits people with disabilities across Europe.

Monitoring the Strategy through the European Social Services Index (ESSI)

The European Commission should put in place a mechanism to monitor the implementation of the strategy, ESN requests to be part of this process based on the expertise we have been developing through the [European Social Services Index](#) (ESSI). The ESSI provides data on access, coverage, legislation of social services across Europe and we can provide specific annual data on areas including long-term care services for adults with disabilities and older people, child protection and the responsibilities of national, regional and local authorities. The ESSI offers a monitoring framework to support both national and EU-level policy implementation.

Collecting up-to-date data on home and community-based services, foster care, personal assistance, and other elements of deinstitutionalisation is essential to

track progress toward independent living for people with disabilities. The ESSI includes a detailed [cross-country analysis](#), informs country-specific recommendations, and has been [endorsed by the European Parliament](#) as a tool the European Commission should look at to improve social services data within European countries. This evidence allows the European Commission to assess national performance and formulate recommendations to improve social inclusion policies within the framework of the European Semester.

ESN members identified monitoring and enforcement of disability legislation as a priority for improving the situation of people with disabilities. Regulatory frameworks alone are insufficient: gaps in technology, persistent stigma, barriers to employment and housing, and inadequate support all limit the realisation of independent living.

ESN emphasises the importance of integrating both qualitative and quantitative indicators to monitor the Disability Strategy effectively. ESN advises the European Commission to **recognise and support the ESSI**, integrating it into EU monitoring mechanisms, including the European Semester, and the mechanism for the review of the implementation of the disability strategy.

Investing in the Social Services Workforce

ESN members highlighted the urgent need to strengthen the [social services workforce](#), particularly in the disability sector. Human resources are scarce, while demand for municipal services continues to grow. As such, **a well-trained and supported workforce is essential to meet current and future needs** and to enable the effective delivery of community-based, person-centred services.

ESN calls on the European Commission to prioritise social services workforce strategies through the [Quality Jobs Roadmap](#) and the upcoming [Quality Jobs Act](#). This work should be closely aligned with other EU initiatives, including the [Anti-Poverty Strategy](#) and the [European Pillar of Social Rights](#), where ESN has consistently advocated for a **dedicated social services workforce strategy**.

The Disability Strategy should include a strong focus on workforce, with a particular focus on training of person-centred and community-based approaches, peer support, and the involvement of people with lived experience of care. This includes supporting informal carers to transition into professional roles within the care and support sectors. Dedicated programmes and funding should be launched under the Strategy to support these objectives as part of a comprehensive workforce approach.

More broadly, the workforce strand should include concrete proposals and investment to strengthen the sector, including:

- Investment in entry-level training, recruitment, retention, career progression, ongoing professional development and adequate remuneration.
- Targeted support for workers transitioning from informal care roles, alongside positive measures to attract and retain staff across the sector.

A strong workforce is also vital to deinstitutionalisation. When community-based services are adequately resourced and staffed, they provide a viable alternative to institutional care. Conversely, workforce shortages risk maintaining or increasing reliance on institutions. As a result, strengthening staff capacity, skills, training, and resources is central to improving social inclusion and the quality of life of people with disabilities.

Moving Forward

In short, the second half of the EU Disability Strategy should:

- Focus on deinstitutionalisation and community care in driving all actions of the disability strategy and underlining the essential role social services have in the implementation process.
- **Promote the EEG proposal to launch an 'EU Knowledge Exchange in Deinstitutionalisation Practice'.**
- Aim for strong EU-level **leadership** through a European Commission coordinator for community care, a cross-DG Working Group on the transition to community care and an advisory group to the European Commission on community care.
- Promote prevention and early intervention approaches for children with disabilities, ensuring the European Child Guarantee invests in early intervention and prevention programmes for children with disabilities and their families.
- **Strengthen support to modernise public service delivery through technology, AI, and digital tools**, through financing technology innovation home initiatives.
- Specific workforce programmes focusing on person- centred and community care training.
- **Adopt a specific monitoring mechanism using the European Social Services Index (ESSI)**
- **Strengthen cross-sector and multi-level cooperation** across local, regional and national authorities, employment services and social services to enable labour market inclusion for people with disabilities.

In relation to other initiatives, the strategy should ensure continuous coordination and promote:

- A **dedicated social services workforce strategy** to build a resilient workforce across Europe.
- **An overarching European quality framework for social services**, followed by one focusing specifically on disability to ensure coherence and avoid fragmentation.
- **Reinstating thematic enabling conditions linked to the EPSR in the next MFF**, prioritising community and family-based care and ensuring a well-funded ESF+.
- Investing in joint action to establish clear criteria to monitor progress on deinstitutionalisation and creation of community-based care systems.