



Brussels, October 29, 2020

Ref: EDF 20-100

Subject: EU COVID-19 vaccination and testing strategies – why are persons with disabilities again excluded?

Open letter addressed to:

President of the European Council

President of the European Parliament

President of the European Commission

Copied to:

Commissioner for Equality

Commissioner for Health

Director of the European Centre for Disease Prevention and Control

Director of the European Union Agency for Fundamental Rights

Members of the European Parliament Disability Intergroup Bureau

Dear Presidents,

The European Disability Forum is an umbrella organisation of persons with disabilities that defends the interests of over 100 million persons with disabilities in Europe. We are a unique platform which brings together representative organisations of persons with disabilities. We are run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities. Our members have been working tirelessly to protect the rights of persons with disabilities during the COVID-19 crisis.

We are deeply concerned to see that in the European Commission's proposed strategy for COVID-19 vaccination deployment neglects persons with disabilities and their support network. We urge you to reconsider this strategy and to ensure that 15% of Europe's population, exposed excessively to the disease, and excluded from treatment, is included as a priority target group. We also call on you to ensure that

the vaccination strategies are developed with meaningful involvement of persons with disabilities and their representative organisations, and that all elements of a vaccination programme are inclusive and accessible: this includes online information and services as well as vaccination centers.

There are 100 million persons with disabilities in the EU and we are a very heterogenous population. By virtue of disability there are a range of reasons we are more endangered by COVID-19. The reasons include:

- Some persons with disabilities carry out their daily activities with a personal assistant, interpreters or other support persons, therefore physical distancing is not possible or very restricting.
- Some persons with disabilities are forced to live in congregated settings where infection rates are very high (e.g. long term residential institutions, psychiatric hospitals, refugee camps...).
- Some persons with disabilities may have pre-existing health conditions or be at an older age that place them at a higher risk to suffer the worst consequences of COVID-19.
- Some persons with disabilities have other health conditions that require more access to healthcare services and therefore are often in public places which increases the risk of infection.
- Many persons with disabilities face discrimination in access to healthcare and life saving treatment.
- Many persons with disabilities do not get access to understandable and accessible public health advice and information.
- Many persons with disabilities live in poverty and this increases all health-related risks, including to COVID-19.
- Many persons with disabilities belong to other marginalised groups and this increases discrimination and risks to be infected by COVID-19. For example, women and girls with disabilities, Roma persons with disabilities, non-white persons with disabilities, refugees with disabilities have been at an higher risks of getting and dying from COVID-19

For all of these reasons, it is important to ensure that persons with disabilities and their support network are prioritised for vaccination, but also for testing. The Recommendation from the Commission, on testing, issued on October 28th, again neglects to identify that persons with disabilities should be prioritised.

We call on you to include persons with disabilities and our representative organisations in the planning for vaccination strategies, and for persons with disabilities, and their support network to be given priority access to safe and reliable vaccinations, free of charge, when they are available.

Concretely, we have the following recommendations:

- COVID-19 vaccination must be defined as a global public good, and made free of charge to all people.
- Persons with disabilities, and their support network must be offered priority access to vaccination; personal assistants, family carers, and persons working in disability related services should be considered as essential workers.
- Specific attention must be paid to ensure sites where vaccinations are delivered are accessible and all information campaigns must be inclusive and accessible to persons with disabilities.
- All electronic information systems related to vaccination must collect data disaggregated by age, gender and disability, and web based services should also be fully accessible, while ensuring the respect for private life and confidentiality of health related information.
- Organisations of persons with disabilities must be properly resourced to become partners in the roll-out of information campaigns, for instance by reaching out to the most marginalised people and ensure their messages are clear, inclusive and accessible.

Please be assured that we stand ready to advise in any way with regard to the EU's response to COVID-19, to ensure that the response is inclusive.

We remain at your disposal should you need any further information or clarification.

Yours sincerely,



Yannis Vardakastanis

President

European Disability Forum

Additional information:

- Disability considerations during the COVID-19 outbreak- World Health Organisation
- [Open letter to leaders at the EU and in EU countries: COVID-19 – disability inclusive response](#)
- [Our letter to EU Commissioner for Health Stella Kyriakides](#)
- Our statement "[Persons with disabilities stripped of support and protective equipment during COVID 19 crisis](#)"
- Our statement "[Residential institutions are becoming hotbeds of infection and abuse – governments need to act now](#)"
- [Letter to World Health Organisation from the International Disability Alliance](#)
- Our open letter "[COVID 19 - medical guidelines should not discriminate against persons with disabilities](#)"
- [EDF members' activities](#)