



Written submission
to the United Nations Committee on the Rights of Persons with Disabilities
for reference to the draft guidelines on addressing multiple and
intersectional forms of discrimination against women and girls with
disabilities

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Submission:
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INTRODUCTION

1. This written submission aims to provide the UN Committee on the Rights of Persons with Disabilities (*hereinafter*: “CRPD Committee”) with key information on the following specific aspects of multiple and intersectional forms of discrimination against women and girls with disabilities, drawing upon the submitting organisations’ extensive experiences, projects, litigation, and legal advocacy work:
 - (1) Anti-discrimination legislation and/or policy frameworks recognising disability and the denial of reasonable accommodation as prohibited forms of discrimination against persons with disabilities (Question 1);
 - (2) Anti-discrimination legislation and/or policy frameworks recognising the multiple and intersecting forms of discrimination affecting women with disabilities on account of their disability and other factors, such as sex, gender, ethnicity, migration status, origin, socio-economic status, religious beliefs, etc. (Question 2);
 - (3) Data-collecting reflecting intersectionality between disability and other factors such as sex, gender, ethnicity, migration status, origin, socio-economic status, religious beliefs, etc. (Question 3);
 - (4) Main intersectional risks and forms of discrimination faced by women and girls with disabilities. Do you consider that the violence and discrimination against women and girls with disabilities is due to two or more of personal characteristics, or that is coloured by these characteristics? (Question 5)
 - (5) Available remedies to women and girls with disabilities facing multiple and intersecting forms of discrimination (Question 7)
 - (6) Examples of positive initiatives, plans, programmes, strategies, legislation addressing multiple and intersecting forms of discrimination against women and girls with disabilities. (Question 8)
2. Submitting organisations are addressing the two specific topics of
 - (1) Groups of women and girls with disabilities facing the greatest risks of multiple and intersectional discrimination (Question 4), and
 - (2) Areas of life in which women and girls with disabilities exposed to multiple and intersecting forms of discrimination are more excluded from the access and enjoyment of their rights (Question 6)in a separate joint submission.

GENERAL REMARK

3. We welcome the CRPD Committee’s readiness to issue guidelines addressing multiple and intersectional forms of discrimination against women and girls with disabilities to guide states parties and other duty bearers to address the implementation gaps and to collect a repository of good practices in addressing multiple and intersecting forms of discrimination against women and girls with disabilities.

SPECIFIC REMARKS

Question 1:

Anti-discrimination legislation and/or policy frameworks recognising disability and the denial of reasonable accommodation as prohibited forms of discrimination against persons with disabilities

4. Submitting organisations’ research across Europe and Africa demonstrates clear deficiencies in how anti-discrimination legislation recognises disability and the denial of

- reasonable accommodation as prohibited forms of discrimination against persons with disabilities.
5. Our analyses have shown that although many countries have incorporated basic disability discrimination provisions following their ratification of the UN Convention on the Rights of Persons with Disabilities (*hereinafter*: “CRPD”), few have adequately recognised the denial of reasonable accommodation as a distinct and actionable form of discrimination in accordance with Articles 2 and 5 of the CRPD and the CRPD Committee’s General Comment No. 6 (2018) on equality and non-discrimination. In several countries, protection from discrimination is narrowly interpreted and/or restricted to employment contexts. These legislative gaps lead to legal ambiguities and limited enforceability in areas such as health, education, housing, and access to justice.
 6. For example, **Bulgaria**’s Protection Against Discrimination Act¹ prohibits direct or indirect discrimination on the ground of disability, however, the denial of reasonable accommodations is not explicitly defined as a form of discrimination. At the same time, the Protection Against Discrimination Act obliges employers to adapt the workplace to the needs of persons with disabilities at their employment or when the disability occurs after the beginning of employment, unless the costs of such adaptation are unreasonably high and would cause serious difficulties to the employer and also obliges educational settings to take appropriate measures to equalise the opportunities for effective exercise of the right to education and training of persons with disabilities, unless the costs involved are unreasonably high and would cause serious difficulties to the provider of education.
 7. Although the Bulgarian legislation, including Article 8 of the Social Services Act, explicitly prohibits discrimination on the basis of gender and disability, inconsistencies between laws perpetuate intersectional discrimination in practice. For instance, victims of domestic violence who have a disability are often directed towards residential services under the Child Protection Act and the Social Services Act. This approach institutionalises the victim instead of addressing the perpetrator. Therefore, although these legal measures contain anti-discriminatory provisions, they may perpetuate discrimination against women and girls with disabilities, since institutionalisation is a form of discrimination.²
 8. **Slovenia** introduced the concept of reasonable accommodation in the Equalisation of Opportunities for Persons with Disabilities Act³ with the obligation of the prior removal of obstacles and barriers (among others, through legislative and administrative measures). The right to reasonable accommodation in various forms is also contained in other laws, for example the Employment Relationships Act,⁴ which stipulates that employers must provide a suitable workplace for workers with disability. However, the concept of reasonable accommodation remains elusive both in practice and in jurisprudence, hindered by the lack of understanding of the meaning and content of reasonable accommodation in accordance with the CRPD Committee’s General comment No. 6 (2018) on equality and non-discrimination. For instance, there are several rulings regarding reasonable accommodation in the workplace where the court de facto denies the obligation of the employer to adapt the work process or workplace for the worker with a disability,⁵ defining reasonable

¹ Protection Against Discrimination Act, Bulgaria ([Закон за защита от дискриминация](#)), adopted September 2003, entered into force January 2004, last amended October 2023 (last accessed 7 October 2025).

² See, Social Services Act, Bulgaria, Art. 8 (non-discrimination), Art. 10(1) (*residential care allowed only if community-based support is exhausted*); Child Protection Act, Bulgaria, Art. 36d (*placement of child-victims of violence in residential social services*).

³ Equalisation of Opportunities for Persons with Disabilities Act, Slovenia, ([Zakon o izenačevanju možnosti invalidov](#)), adopted November 2010, entered into force December 2010, last amended November 2024 (last accessed 7 October 2025).

⁴ Employment Relationships Act, Slovenia, ([Zakon o delovnih razmerjih](#)) adopted March 2013, entered into force April 2013, last amended September 2025 (last accessed 7 October 2025).

⁵ For instance the ruling of Higher Labour and Social Court, Slovenia, [Pdp 749/2022](#) (last accessed 7 October 2025).

- accommodation too rigidly. Additionally, the Protection Against Discrimination Act⁶ does not define the denial of reasonable accommodation as a form of discrimination in accordance with Articles 2 and 5 of the CRPD.
9. In **Spain**, Royal Legislative Decree 1/2013, of 29 November, on the General Law on the Rights of Persons with Disabilities and their Social Inclusion, recognises the eradication of all forms of discrimination against persons with disabilities as one of its objectives, and establishes a system of infringements and penalties. Furthermore, Law 15/2022 of 12 July on equal treatment and non-discrimination establishes that no one may be discriminated against on the grounds of their disability. In addition to recognising the necessary adaptations for victims of discrimination, this law recognises that denying reasonable accommodations to persons with disabilities constitutes direct discrimination. Additionally, Article 10 of the Spanish Constitution states that all rules relating to the fundamental rights and freedoms recognised by the Constitution must be interpreted in accordance with the Universal Declaration of Human Rights, as well as international treaties and agreements on these matters that have been ratified by Spain. This includes the CRPD and the UN Convention on the Elimination of All Forms of Discrimination against Women (*hereinafter*: “CEDAW”), among others.
 10. Through the DIS-CONNECTED project, which was implemented across five European countries, we have documented how the failure to recognise denial of reasonable accommodation particularly affects women and girls with disabilities.⁷ Justice systems often do not put in place adequate and appropriate communication supports or procedural adjustments that would enable women and girls with disabilities who have been victims of gender-based violence to participate effectively in legal proceedings.⁸ The Voices for Justice research project, implemented in eight countries, found that “victims with disabilities face insurmountable barriers that block their access to criminal justice in Europe,”⁹ with women with disabilities being “two to five times more likely to be victims of violence.”¹⁰
 11. In many African contexts, women and girls with psychosocial disabilities face compounded exclusion due to systemic neglect, cultural stigma, and limited access to rights-based mental health services. Structural inequities – including colonial legacies, underfunded health systems, and the absence of peer-led models – further marginalise these communities. Addressing these gaps requires intentional inclusion of African lived experiences, investment in community-based services, and dismantling of stigma through culturally relevant advocacy.
 12. In **Uganda**, the Persons with Disabilities Act¹¹ recognises several rights of persons with disabilities and it also prohibits discrimination and inhuman and degrading acts. It goes on to guarantee reasonable accommodations for public services and buildings, both privately and publicly owned. These provisions were buttressed in the case of *Candia Emmanuel v Attorney General*,¹² where the High Court of Uganda found that the failure of the government to host the different High Courts in buildings that have reasonable

⁶ Protection Against Discrimination Act, Slovenia, ([Zakon o varstvu pred diskriminacijo](#)), adopted April 2016, entered into force May 2016, last amended April 2018 (last accessed 7 October 2025).

⁷ See, ‘[Disability-based Connected Facilities and Programmes for Prevention of Violence against Women and Children](#)’ (101049690 - DIS-CONNECTED) (last accessed 7 October 2025).

⁸ Sarah Rocha, ‘[Ending Violence, Ensuring Inclusion: Strengthening Protections Against Gender- and Disability-Based Violence](#)’, Validity Foundation and others, 2025 (last accessed 7 October 2025).

⁹ See, ‘[Voices for Justice: Empowering persons with disabilities to access justice](#)’ (878604 - InfoComPWDs) (last accessed 7 October 2025).

¹⁰ Joanna Perry and Paola Grenier, ‘[Humanising Justice: International report from Voices for Justice: Communicating with Victims of Crime with Disability](#)’, Validity Foundation, 2022, p. 5. (last accessed 7 October 2025).

¹¹ See, https://media.ulii.org/media/legislation/18449/source_file/2cb847f37f752746/2020-3.pdf (last accessed 7 October 2025).

¹² Miscellaneous Cause No. 158 of 2018, Uganda, <https://ulii.org/akn/ug/judgment/ughccd/2024/40/eng@2024-01-18> (last accessed 7 October 2025).

accommodation for persons with physical disabilities amounts to discrimination and is a violation of the rights guaranteed under the Persons with Disabilities Act.

13. Despite this, the promise of reasonable accommodation for persons with disabilities remains on paper, and there is no tangible commitment to allocating resources to ensure such reasonable accommodations become a reality. Even in the *Candia* judgment the Court fell short of ordering the government to put in place reasonable accommodations and only required them to take progressive steps to do so due to lack of funds. The principle of progressive realisation is not a defence to failure to allocate available funds to realise reasonable accommodations for persons with disabilities. This failure should count as a violation of human rights.

Question 2:

Anti-discrimination legislation and/or policy frameworks recognising the multiple and intersecting forms of discrimination affecting women with disabilities on account of their disability and other factors, such as sex, gender, ethnicity, migration status, origin, socio-economic status, religious beliefs, etc.

14. Validity's research has found that most countries do not have legal frameworks for addressing situations where multiple and intersectional forms of discrimination operate simultaneously against women and girls with disabilities.
15. For example, **Bulgaria's** Protection Against Discrimination Act defines multiple discrimination as 'discrimination based on more than one [protected] ground',¹³ but intersectional discrimination is not prohibited by law. There is no case law in Bulgaria effectively dealing with the concept of multiple or intersectional discrimination.¹⁴
16. The Protection Against Discrimination Act in **Slovenia** prohibits multiple discrimination, which is defined as a severe form of discrimination. However, multiple discrimination is only included in legislation and not in policies or strategies. Intersectional discrimination is not regulated by Slovenian legislation and is not included in national policies and strategies. Legislation and policies treat sex, gender, disability, and other personal circumstances as separate categories while overlooking their intersection. For instance, the Vocational Rehabilitation and Employment of Persons with Disabilities Act¹⁵ regulates a quota system, yet it fails to provide measures that address the specific challenges disproportionately faced by women with disabilities, such as balancing care responsibilities with employment.
17. In **Spain**, Organic Law 3/2007 of 22 March on effective equality between women and men¹⁶ provides, as stated in the Explanatory Memorandum, special consideration for cases of "double discrimination" and the unique difficulties faced by women who are in particularly vulnerable situation, such as those belonging to minorities, migrant women, and women with disabilities. However, its articles do not define the concept of double discrimination or propose specific measures to combat it. Article 14.6 establishes a general criterion for action by public authorities: "*Consideration of the specific difficulties encountered by women who are members of particularly vulnerable communities, such as women members of minorities or immigrant groups, girls, women with disabilities and elderly women, widows and victims of gender violence, for whom the public authorities may also adopt positive action measures.*"

¹³ Protection Against Discrimination Act, Bulgaria, (supra at fn. 1), Additional Provisions, paragraph 1(11).

¹⁴ Cf. European network of legal experts in gender equality and non-discrimination, '[Country Report-Non-discrimination, Bulgaria 2025](#)', European Union, 2025, pp. 18-19. (last accessed 7 October 2025).

¹⁵ Vocational Rehabilitation and Employment of Persons with Disabilities Act, Slovenia, ([Zakon o zaposlitveni rehabilitaciji in zaposlovanju invalidov](#)), adopted May 2004, entered into force June 2004, last amended February 2021 (last accessed 7 October 2025).

¹⁶ See, https://www.coe.int/t/pace/campaign/stopviolence/Source/spain_constitutionalact3_2007_en.pdf (last accessed 7 October 2025).

18. Spain's Consolidated Text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November,¹⁷ includes two references to multiple discrimination in its articles. Section 4 of Article 7 (Right to Equality) establishes that "*public administrations shall provide particularly intensive protection to persons or groups who are especially vulnerable to multiple discrimination, such as children and women with disabilities, older persons with disabilities, women with disabilities who are victims of gender-based violence, persons with multiple disabilities, and persons with disabilities who are members of minorities.*" Section 1 of Article 67 (Positive Action Measures) provides that "*public authorities shall adopt positive action measures to benefit those persons with disabilities who are likely to be subject to a greater degree of discrimination, including multiple discrimination, or to a lesser degree of equal opportunities, such as women and children, who require greater support to exercise their autonomy or to make free decisions and who suffer more severe social exclusion, as well as persons with disabilities who habitually live in rural areas.*"

Question 3:

Data-collecting reflecting intersectionality between disability and other factors such as sex, gender, ethnicity, migration status, origin, socio-economic status, religious beliefs, etc.

19. Submitting organisations' research experiences in a number of projects reveal deficiencies in data collection systems that could capture intersectional discrimination affecting women and girls with disabilities across multiple characteristics. Disaggregated data - especially at the intersections of gender, age, disability type, and ethnicity - remains scarce or absent, contrary to States' obligations under Article 31 of the CPRD.
20. In endeavouring to collect data on how women and girls with disabilities experience crime victimisation across several European countries, we have found that "*data and information are not routinely collected or analysed, and the experiences and voices of victims with disabilities are not taken into account.*"¹⁸ This absence of systematic and long-term data collection obscures the patterns of discrimination affecting women and girls with disabilities and is a barrier to the development of targeted interventions.
21. In discrimination proceedings, statistical data is frequently used to establish indirect discrimination. Governments, however, often fail to collect such data, thereby damaging accountability and avoiding findings of indirect discrimination.
22. Although relevant data on disability and its intersection with other factors are collected in **Spain**, these data are not always detailed enough to cover all dimensions of intersectionality. Nevertheless, available survey findings and reports¹⁹ provide a valuable foundation for understanding the various forms of discrimination and social exclusion experienced by persons with disabilities in Spain.

Question 5:

Main intersectional risks and forms of discrimination faced by women and girls with disabilities. Do you consider that the violence and discrimination against women and girls with disabilities is due to two or more of personal characteristics, or that is coloured by these characteristics?

23. Please read our answers to the first sub-question in our separate submission on questions 4 and 6.

¹⁷ See, <https://boe.es/buscar/act.php?id=BOE-A-2013-12632> (last accessed 7 October 2025).

¹⁸ 'Humanising Justice: International report from Voices for Justice: Communicating with Victims of Crime with Disability' (supra at fn. 10), p. 5.

¹⁹ For example, Centro de Investigaciones Sociológicas, '[Percepción de la discriminación en España](#)' [Perception of discrimination in Spain], Estudio No 3000, 2013 (last accessed 7 October 2025); Survey on Disability, Personal Autonomy and Dependency Situations 2023.; Instituto Nacional de Estadística, '[Survey on Disability, Personal Autonomy and Dependency Situations 2023](#)' (last accessed 7 October 2025).

24. Submitting organisations consider that violence and discrimination against women and girls with disabilities result from the interaction and overlap of gender, disability, and other personal characteristics and external factors, creating a unique, intensified, and compounded experience of harm. Furthermore, a combination of the factors of gender inequality, disability-based discrimination and other potential disadvantages based on other personal characteristics, puts women and girls with disabilities at a significantly higher risk of human rights violations than women and girls with only one of these characteristics. The violence and discrimination they experience is not simply additive, it is shaped by the interaction of these characteristics.
25. For instance, violence and discrimination against women and girls with albinism often arise from the interplay of gendered power relations and disability-specific stigma. Examples include:
- A woman with albinism being denied sexual and reproductive health services because of assumptions about her fertility or capacity to consent;
 - A girl with albinism excluded from school because teachers consider her ‘ineducable’ and because classrooms lack protective shade or accessible materials;
 - Survivors of sexual assault being disbelieved due to disability-based stereotypes and the additional stigma associated with albinism.

These examples illustrate that the harms are not additive but compound in ways that require tailored, gender- and disability-sensitive and condition-specific responses.

Question 7:

Available remedies to women and girls with disabilities facing multiple and intersecting forms of discrimination.

26. In our view, in general, remedies to women and girls with disabilities facing multiple and intersecting forms of discrimination are not available, accessible, adequate, effective, prompt and appropriate.²⁰ Women and girls with disabilities must receive effective, not merely symbolic, redress that is proportionate to the gravity of the harm suffered and accessible in a timely manner.
27. **Bias in the Issuance of Remedies:** For much of history, and in many societies today, legislature have been dominated by non-racialised men who do not have disabilities, leading to legal systems designed from a non-disabled, male-centric perspective. This origin makes traditional legal frameworks inherently discriminatory. Consequently, a discriminatory system cannot provide adequate redress, as its structure and mode of operation are discriminatory by design and this discriminatory nature must be explicitly recognised and corrected, and the biases within its operation must be identified and remedied.
28. **Delayed Justice as Denied Justice:** In accordance with the Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law, redress must, first and foremost, ensure equal access to effective judicial remedies. In the context of discrimination against women with disabilities, barriers such as delayed or expensive justice must be recognised as forms of discrimination on the grounds of both gender and disability. Without access to effective justice, women with disabilities are precluded from obtaining any form of remedy.
29. **General and Individual Measures:** Based on the experiences of the submitting organisations, judicial remedies concerning women with disabilities cannot be limited to

²⁰ Cf. UN General Assembly, ‘[Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law](#)’, A/RES/60/147, 21 March 2006, paras 2(c) and 15 (last accessed 7 October 2025).

individual measures, as the discrimination they face is systemic in nature. Accordingly, redress must address the structural causes of such discrimination.

30. **The role of courts and equality bodies:** In determining reparation, courts must consider several factors, including how the discriminatory act:
 - a) affected the life and well-being of the woman or girl with disabilities;
 - b) contributed to the perpetuation of stereotypes and stigmatisation;
 - c) impacted mental health;
 - d) undermined quality of life, inclusion, and social participation;
 - e) resulted in material damage, including negative financial impact.
31. The submitting organisations' view is that courts and equality bodies should proactively invite and enable the participation of women with disabilities within the judiciary and the work of equality bodies. Their lived experience provides insights that cannot be fully understood or represented by personnel without direct, first-hand experience and knowledge.

Question 8:

Examples of positive initiatives, plans, programmes, strategies, legislation addressing multiple and intersecting forms of discrimination against women and girls with disabilities.

32. On 23 April 2025, a district court in Stara Zagora, **Bulgaria**, awarded substantial damages to Tanya Petkova, a woman with psychosocial disabilities, for repeated periods of psychiatric detention and coercive practices violating her dignity and autonomy and for the trauma inflicted upon her. The decision is a rare judicial acknowledgment of the impacts of intersecting discrimination on the bases of disability and gender, in alignment with international human rights law.²¹
33. In its judgment, the Court referred to the CEDAW and to the CRPD and emphasised that the applicant faced discrimination and recognised that her experience was shaped by the joint impact of both gender and disability. The court also underlined that the hospital had not provided gender-sensitive training for healthcare workers that would enable them to recognise and appropriately address the effects of gender-based violence.
34. Tanya highlighted after the judgment: “Apparently, the truth really does disarm. Honesty and sincerity say much more than carefully chosen words. I remained calm while answering the judge’s questions because I knew I was telling the truth. My lawyers and I cooperated fully. We achieved what many thought impossible — a woman who had spent 20 years in various psychiatric institutions found the courage to bring a case against the most abusive among them.”²²
35. In **Slovenia**, some key information on sexual violence is available in an easy-to-read format, prepared by disability and other non-governmental organisations.²³ For instance, one of the Slovenian criminal court's key judgments on what constitutes rape has been translated into easy-to-read format.²⁴
36. The adoption and domestication of the *AU Plan of Action on Albinism (2021–2031)*²⁵ is another positive example. Several States, including **Tanzania, Uganda, Malawi, Mozambique, and Angola**, have already developed specific and multisectoral national action plans to address the challenges faced by persons with albinism in general, and women and girls with albinism in particular. The African Committee of Experts on the

²¹ More on the case: '[Woman with Lived Experience of Institutionalisation Wins Landmark Case Against Psychiatric Hospital in Bulgaria](#)', Validity Foundation & Network of Independent Lawyers, 2025 (last accessed 7 October 2025).

²² Ibid.

²³ See, https://www.zveza-sozitie.si/modules/uploader/uploads/news/files_news/Spolnonasilje.pdf (last accessed 7 October 2025).

²⁴ See, https://risa.si/risa/wp-content/uploads/cklb/20-minut-pdf/2019_01-02.pdf (last accessed 7 October 2025).

²⁵ See, <https://africaalbinismnetwork.org/wp-content/uploads/2022/09/1640085668084rgprabbsh8-1.pdf> (last accessed 7 October 2025).

Rights and Welfare of the Child (ACERWC) has also developed a guiding note to be adopted by states on reporting on children with albinism in Africa.

37. The 2022-2025 *State Strategy to Combat Gender-Based Violence*²⁶ in **Spain** incorporates measures such as:

Measure 41. Conducting a survey on gender-based violence against women with disabilities.

Measure 51. Introduction of an intersectional approach in all studies on gender-based violence, taking into account the diversity and specificities of women with disabilities, women over 65 and of retirement age, young women, women in rural areas, migrant women, convicted women, women suffering from dual pathologies and addictions, women of other ethnicities, sons, daughters and minors in the care of women victims, as well as their social class.

Measure 62. Publication of specific and specialised studies on gender-based violence against women with disabilities.

Measure 133. Development, update and dissemination of common specialised health protocols for the detection and care of all forms of gender-based violence (violence by a partner or ex-partner, sexual violence outside the couple, trafficking of women for sexual exploitation, female genital mutilation, forced marriages), for implementation in all centres that make up the National Health System, and addressing diversity with an intersectional approach (women with disabilities, rural women, older women and women of retirement age, migrants and women in prison, etc.).^{27 28}

²⁶ See, '[State strategy to Combat Gender-based Violence 2022-2025](#)' (last accessed 7 October 2025).

²⁷ See also Measures 179, 188, 190, 255.

²⁸ Information about the implementation of the Strategy is not yet available.