

Sightsavers submission to the CRPD draft guidelines on addressing multiple and intersectional forms of discrimination against women and girls with disabilities

Introduction

Sightsavers welcomes the opportunity to provide input for the CRPD Committee's draft guidelines on addressing multiple and intersectional forms of discrimination against women and girls with disabilities. Sightsavers is an international non-governmental organisation which works with partners to eliminate avoidable blindness and promote equity of opportunity for persons with disabilities in over thirty countries in Africa and Asia.

Based on Sightsaver's experience in policy, research and programmes, this submission provides an outline of the challenges and best practices on addressing multiple and intersectional forms of discrimination against women and girls with disabilities, and subsequent recommendations for the Guidelines.

Legislation and policy frameworks

While many countries that Sightsavers works in have enacted anti-discrimination legislation, these frameworks often treat gender and disability separately, creating significant gaps in protection. For example, Bangladesh's Rights and Protection of Persons with Disabilities Act (2013) and the National Women's Advancement Policy (2011) make no specific provision for women and girls with disabilities¹. Similarly, a review of 190 countries found that 27% of domestic violence laws made no mention of women with disabilities, 84% lacked provisions on sexual harassment against them, and only 9% addressed accessibility of support services². This demonstrates how existing gender equality frameworks frequently overlook women and girls with disabilities, especially those facing multiple and intersecting forms of discrimination.

Even where women and girls with disabilities are included in legal frameworks, implementation is inconsistent and often ineffective. For example, even when access to justice is guaranteed in principle, this is often undermined by barriers such as the

¹ CRPD Committee (2022) [Concluding observations on the initial report of Bangladesh](#)

² United Nations (2024) [Disability & Development Report 2024](#)

lack of sign language interpreters, absence of tactile signage, discriminatory stereotypes, and restrictive evidentiary requirements^{3,4}. These challenges disproportionately affect women with psychosocial disabilities, persons with albinism, and women with leprosy⁵. Limited awareness among state officials, weak accountability systems, and scarce socio-economic resources exacerbate these barriers, ensuring that rights guaranteed on paper are not realised in practice^{6,7}.

The Guidelines should support States to adopt a twin-track approach and articulate the importance of including women and girls across all policy frameworks. This means systematically including women and girls with disabilities in all mainstream development policies and programmes, while also establishing targeted initiatives that respond to their diverse needs. Legal and policy frameworks must be accompanied by sufficient financing, transparent implementation, robust accountability mechanisms, and accessible grievance mechanisms that explicitly safeguard the rights of women and girls with disabilities, particularly those facing multiple and intersecting forms of discrimination.

Exclusion is further compounded by the limited participation of women with disabilities in policymaking and governance processes^{8,9,10}. Across 14 East Asia and Pacific countries, women with disabilities are significantly underrepresented in national disability policy bodies, less than half as likely as men with disabilities to participate, and in six countries, there is no representation at all¹¹. This absence means that the lived realities of women with disabilities facing intersectional discrimination remains largely invisible to policymakers, and their specific concerns are overlooked in the design and implementation of laws and programmes.

This underscores the importance of meaningfully engaging women and girls with disabilities facing intersectional discrimination. An example of inclusive policymaking comes from Uganda, where Sightsavers convened a participatory workshop with women with disabilities experiencing different forms of intersectional discrimination, GBV stakeholders, law enforcement, and healthcare providers¹². This allowed women with disabilities to identify the gaps and barriers to accessing GBV services, discuss their priorities with policy makers, and therefore shape disability-inclusive GBV policies. The workshop also enabled stakeholders to discuss the challenges of delivering disability-inclusive services faced by provider and explore solutions and ways to improve access for women and girls with disabilities. Building on this,

³ UN Women (2020) [Mapping of discrimination against women and girls with disabilities in East and Southern Africa](#)

⁴ United Nations (2017) Report of the Special Rapporteur on the Rights of Persons with Disabilities on the Sexual and reproductive health and rights of girls and young women with disabilities.

⁵ UN Women (2020) [Mapping of discrimination against women and girls with disabilities in East and Southern Africa](#)

⁶ Hlalele et al (2014) "Botswana" in African Disability Rights Yearbook, ADRY Vol 2. Pgs.151-167

⁷ UN Women (2020) [Mapping of discrimination against women and girls with disabilities in East and Southern Africa](#)

⁸ UN Women (2025) 30 Year of Beijing Platform for Action: An Intersectional Approach to Gender and Disability Inclusion

⁹ World Bank (2020) Fragility, Conflict and Violence ida.worldbank.org/theme/conflict-and-fragility

¹⁰ Sightsavers (2023) [Submission General recommendation No 40. on the equal and inclusive representation of women in decision-making systems](#)

¹¹ Disability & Development Report 2024.

¹² Muchiri (2024) [Collaborating to improve gender-based violence services](#)

Sightsavers developed a guide for state institutions to integrate disability inclusion into GBV prevention and response¹³. This model demonstrates how partnerships with women-led OPDs and other stakeholders can lead to more responsive and inclusive frameworks.

The CRPD Guidelines should therefore encourage States to promote such participatory approaches, foster collaboration with women's organisations and OPDs, and dedicate specific funding to ensure the consultation and leadership of women with disabilities facing intersectional discrimination.

Data collection

In most of the countries where Sightsavers operates, governments do not systematically collect intersectional data linking disability with identity factors such as sex, gender, ethnicity, migration status, socio-economic status, or religion^{14, 15, 16, 17}.. A review of 20 national Beijing+30 reports, including those from Kenya, Mozambique, Sierra Leone, Namibia, Ghana, Zimbabwe, Malawi, and Tanzania, revealed that data on women with disabilities remains scarce and underused¹⁸. Although countries such as Kenya, Uganda, Nigeria, and Rwanda increasingly apply Washington Group Short Set (WGSS), cross-analysis of gender and disability remains rare, hindering accurate identification of women's needs¹⁹. The Guidelines should encourage States to include WGSS in national censuses, disaggregate data by gender, disability, and other characteristics, and ensure intersectional analysis informs policy and programmes.

Progress has been made in Senegal, where Sightsavers worked with the National Agency for Statistics and Demography (ANSD) and local OPDs²⁰. The 2023 census included the WGSS and disaggregated findings by sex, age, education, and living standards, with a dedicated chapter on disability in the Population and Housing Report²¹. This was supported by the Inclusive Data Charter (IDC), a global initiative strengthening disaggregated data to address the needs of marginalised people. Cameroon has also joined the IDC, leading to updates in its statistical guide to

¹³ Sightsavers (2023) Disability-Inclusive Gender Based Violence Prevention and Response: A guide for state institutions in Uganda

¹⁴ CRPD Committee (2022) [Concluding observations on the initial report of Bangladesh](#)

¹⁵ Joint National Association of Persons with Disabilities (2025) [Nigeria Alternative Report/List of Issues on the implementation of the CRPD](#)

¹⁶ CRPD Committee (2023) [List of issues prior to submission of the combined second to fourth periodic reports of Kenya](#)

¹⁷ UNICEF et al. (2025) [Global Disability Inclusion Report Accelerating Disability Inclusion in a Changing and Diverse World](#)

¹⁸ Humanity and Inclusion (2024) [Powerful yet overlooked: African women with disabilities and the ongoing struggle for inclusion, 30 years after Beijing.](#)

¹⁹ Humanity and Inclusion (2024) [Powerful yet overlooked: African women with disabilities and the ongoing struggle for inclusion, 30 years after Beijing.](#)

²⁰ Global Partnership for Sustainable Data (2024) [Advancing sustainable development together: Senegal's Inclusive Data Charter Action Plan](#)

²¹ Agence Nationale de la Statistique et de la Démographie (2024) [Rapport provisoire du 5ème Recensement général de la population et de l'habitat, 2023 \(RGPH-5, 2023\)](#)

improve inclusivity²². The Guidelines should encourage States to sign the IDC and develop national action plans to demonstrate their commitment to inclusive data.

Citizen generated data is also vital to complement official statistics and close persistent gaps. In Kenya, OPD-led initiatives are increasingly integrated into National Statistical Office reporting, enhancing accountability and prompting responsive planning for more inclusive SDG delivery²³. These efforts contributed to the Copenhagen Framework on Citizen Data, which provides guidance on embedding citizen participation into data systems to promote inclusivity, transparency, and impact²⁴. The Guidelines should emphasise partnerships with OPDs and recognise citizen data as a key component of inclusive systems.

Despite progress, efforts remain fragmented and fragile. Government-led and OPD supported data collection must be institutionalised and resourced so inclusive data shifts from isolated projects to system wide practice. The CRPD Guidelines should therefore call on States to invest in national data partnerships with OPDs, ensure women and girls with disabilities participate fully in data collection and analysis.

Areas of life in which women and girls with disabilities are exposed to multiple and intersecting forms of discrimination

Women and girls with disabilities experience multiple and intersecting forms of discrimination across all aspects of life²⁵.

Political Participation

Women and girls with disabilities face multiple and intersecting forms of discrimination that severely restrict their political participation, undermining rights guaranteed under Article 29 of the CRPD^{26, 27, 28, 29, 30}.

The International Foundation for Electoral Systems' (IFES) Intersectionality Assessment Framework identifies barriers and opportunities for inclusive

²² Global Partnership for Sustainable Development Data (2024) [Localizing inclusive data: Lessons from Sightsaver's work in Cameroon](#).

²³ United Nations (2023) [United Nations Expert Group Meeting on Citizen Data: a Conceptual Framework 28 – 29 September 2023, Copenhagen, Denmark Report](#)

²⁴ IISD (2024) [The Copenhagen Framework on Citizen Data for a More Inclusive Data Ecosystem](#)

²⁵ Bond (2024) [An intersectional approach to disability inclusion: A resource for members of the Bond Disability and Development Group, donors, and wider NGO sector](#)

²⁶ Article 29 of the CRPD, Participation in political and public life

²⁷ Sightsavers (2022) The participation of men and women with disabilities in political life in Cameroon: Endline report November 2022 https://research.sightsavers.org/wp-content/uploads/2022/11/Sightsavers_political-participation-report-cameroon-english-november-2022.pdf

²⁸ Sightsavers (2022) The participation of men and women with disabilities in political life in Senegal: Endline study <https://research.sightsavers.org/wp-content/uploads/2022/11/Sightsavers-political-participation-endline-report-senegal-english-2022.pdf>

²⁹ UN Women (2019). [Leadership and political participation of women with disabilities](#)

³⁰ Inclusion International (2015) [Accessing the Ballot Box: Inclusive Civic Engagement for People with Intellectual Disabilities](#)

participation and has informed initiatives such as Power to Persuade, which trains women with disabilities to influence policy^{31, 32}. In Armenia, collaboration between OPDs and women's rights groups integrated disability into gender-based violence legislation^{33, 34}. In West and Central Africa, Sightsavers supported the world's first "Gender Café," bringing together women with disabilities and politicians, resulting in over 204 persons with disabilities being elected or included in political processes³⁵.

Therefore, the Guidelines should support States to conduct intersectional assessments on barriers to political participation, ensure accessible electoral systems, foster cross-movement partnerships, and deliver targeted leadership training to promote inclusive governance and equal participation.

OPDs play a crucial role in advancing women's political participation by facilitating access to documentation and promoting inclusive laws. However, a UNPRPD (2022) study across 26 countries found most OPDs remain male dominated, with few representing women's voices³⁶. To address this, Sightsavers has begun mapping OPDs to identify those led by or focused on women, to strengthen advocacy for women and girls with disabilities³⁷. The Guidelines should urge States to strengthen women's roles within OPDs, support organisations led by women with disabilities in all their diversity and ensure their participation in national and international forums. States should support access to leadership and participation opportunities for women and girls with disabilities in women's rights organisations.

Health

Women and girls with disabilities face significant exclusion from health services, especially where gender, disability, and sexuality intersect^{38, 39, 40, 41, 42}. Barriers include high costs, stigma, inaccessible facilities, and limited provider capacity.

Interventions to address stigma and discrimination include awareness raising initiatives, disability sensitisation training for stakeholders, and broader social

³¹ Agate Rights Defense Center for Women with Disabilities (2018). [The Political Participation of Armenian Women with Disabilities: Barriers and Recommendations](#).

³² IFES (2020). [Identity and Politics in Lebanon](#).

³³ Agate Rights Defense Center for Women with Disabilities (2018). [The Political Participation of Armenian Women with Disabilities: Barriers and Recommendations](#).

³⁴ IFES (2020). [Identity and Politics in Lebanon](#).

³⁵ Disability Inclusion Helpdesk (2023) [Evidence digest focus issue: Disability Inclusion and Political Participation and Leadership](#)

³⁶ UNPRPD (2022) Situation Analysis of the rights of persons with disabilities: Lessons and conclusions from twenty-six countries

³⁷ Sightsavers (2023) [Creating a disability inclusive world: Inside Sightsavers' social inclusion strategy](#)

³⁸ World Health Organization (2022). [Global report on health equity for persons with disabilities](#).

³⁹ Brown HK, Chen S, Vigod SN, Guttman A, Haverkamp SM, Parish SL et al. (2022) [A population-based analysis of postpartum acute care use among women with disabilities](#).

⁴⁰ Silberholz E et al. (2017). [Disparities in access to care in marginalized populations](#).

⁴¹ McCann E, Lee R, Brown M (2016). [The experiences and support needs of people with intellectual disabilities who identify as LGBT: a review of the literature](#)

⁴² Ayhan CHB et al. (2020). A systematic review of the discrimination against sexual and gender minority in health care settings

marketing campaigns^{43, 44}. However, few interventions have been evaluated for effectiveness, and even fewer scaled up to institutional or societal levels⁴⁵.

The CRPD Guidelines should urge States to address intersecting discrimination by identifying and prioritising those at highest risk, including women and girls with disabilities, older people, children, people living in poverty, displaced persons, and marginalised communities. States should provide intersectional training for health providers and ensure facilities, goods, and services are physically accessible, safe, and inclusive for all, particularly vulnerable populations such as ethnic minorities, indigenous people, persons with HIV/AIDS, and LGBTIQ+ individuals.

Sexual and Reproductive Health and Rights (SRHR)

Women and girls with disabilities facing intersecting forms of discrimination are often denied the right to form relationships, marry, or have children, and continue to experience forced sterilisation, abortion, and contraception⁴⁶. Harmful stereotypes, assuming they are asexual, hypersexual, or incapable of parenting, demonstrate how gendered and disability-based stigma intersect to marginalise them further⁴⁷.

The Guidelines should recognise the role of these intersecting stereotypes in restricting SRHR and require States to address them through law, policy, and awareness-raising. They should also urge States to prohibit coercive reproductive practices, guarantee equal access to comprehensive SRHR services, and ensure the meaningful participation of women with disabilities, especially from marginalised groups, in policy design, implementation, and monitoring to uphold their rights and autonomy.

Employment

Women with disabilities face multiple and intersecting barriers throughout the employment cycle, limiting economic participation and independence⁴⁸.

Inclusive Futures, which is UK aid's flagship programme on disability inclusion, led by Sightsavers and the International Disability Alliance, highlights that participation alone does not ensure equality due to intersecting factors such as gender norms, caregiving roles, and societal devaluation of women's work compound exclusion. In Bangladesh, women with disabilities earned less than men despite equal training enrolment. In Nepal, gender inclusion training for employers, self-advocacy for women, and social behaviour change campaigns improved confidence and pay

⁴³ IDS (2014) [Good practices in the provision of accessible and inclusive WASH services](#). UNICEF Country Offices.

⁴⁴ Collins RL, et al (2019) [Social marketing of mental health treatment: California's mental illness stigma reduction campaign](#). *Am J Public Health*.

⁴⁵ World Health Organization (2022). [Global report on health equity for persons with disabilities](#).

⁴⁶ United Nations (2017) [Report of the Special Rapporteur on the Rights of Persons with Disabilities on the Sexual and reproductive health and rights of girls and young women with disabilities](#).

⁴⁷ United Nations (2017) [Report of the Special Rapporteur on the Rights of Persons with Disabilities on the Sexual and reproductive health and rights of girls and young women with disabilities](#).

⁴⁸ CRPD (2016) [General Comment No. 3 on Article 6, Women and girls with disabilities](#).

outcomes⁴⁹. Drawing from this experience, Inclusive Futures has developed guidelines to ensure women and girls with disabilities benefit equitably from economic empowerment policies and programmes⁵⁰.

The Guidelines should build on CRPD General comment No. 8 (2022)⁵¹ to encourage States to adopt similar intersectional approaches in economic empowerment laws, policies, and programmes. States should develop social protection systems that address intersectional discrimination, ensure fair pay, and provide an adequate standard of living for caregivers with disabilities. Dismantling intersecting stereotypes that assign caregiving roles to women should be a central priority to promote equality and economic inclusion.

Education

Girls with disabilities remain among the most excluded learners, facing intersecting barriers linked to gender, disability, and other identities such as ethnicity or origin^{52, 53}.

To advance inclusive education, in line with CEDAW General Comment No.36 (2017)⁵⁴ and CRPD General Comment No.3 (2015)⁵⁵ the Guidelines should call on States to adopt gender responsive and disability inclusive strategies and eliminate intersectional stereotypes in curricula and teaching materials. Girls and adolescents with disabilities, parents, youth groups and OPDs should also be meaningfully engaged in the development and implementation of education policies and plans at all levels. Girls with disabilities facing multiple forms of discrimination, and their families, must also have access to financial support for school enrolment, attendance, and participation in the education system.

Positive initiatives

Intersectionality Resource Guide and Toolkit

The **Intersectionality Resource Guide and Toolkit (2021)**⁵⁶, developed by UN Women and the UNPRPD in collaboration with civil society and organisations of persons with disabilities, provides a practical framework to address multiple and intersecting forms of discrimination. It responds to the disproportionate impacts of COVID-19 on women and girls with disabilities, highlighting that “add and stir”

⁴⁹ For examples of our Social Behaviour Change approaches, see Inclusive Futures (2022). [Using social behaviour change to promote disability inclusion in development programmes.](#)

⁵⁰ Inclusive Futures (2023). [Be Inclusive: Including women and girls with disabilities in development and humanitarian projects.](#)

⁵¹ UNCRPD (2022) [General comment No. 8 on the right of persons with disabilities to work and employment](#)

⁵² Gilliam, W. Set al. (2016). [Do early educators' implicit biases regarding sex and race relate to behavior expectations and recommendations of preschool expulsions and suspensions?](#)

⁵³ Gilliam, W. S. (2016). [Early childhood expulsions and suspensions undermine our nation's most promising agent of opportunity and social justice.](#)

⁵⁴ CEDAW (2017) [General recommendation No. 36 \(2017\) on the right of girls and women to education](#)

⁵⁵ CRPD (2016) [General comment No.3 on Article 6 – women and girls with disabilities](#)

⁵⁶ UNPRPD and UN Women (2021) [Intersectionality resource guide and toolkit](#)

approaches obscure compounded inequalities in access to health, protection from violence, employment, and social wellbeing. Instead, the toolkit advances a shift in mindset, promoting enablers such as recognition of diverse knowledges, examination of power relations, and reflexivity.

The CRPD Guidelines should draw on this toolkit to support States to embed intersectionality into national laws, policies and programmes, ensure meaningful co-design with women and girls with disabilities, and adapt interventions to local contexts. States Parties should be guided to institutionalise these principles, strengthen accountability mechanisms, and align intersectional approaches with both CRPD obligations and the SDGs' commitment to "leave no one behind."

Sightsavers Disability Inclusive Scorecard (DISC)

The active involvement of women and girls who experience multiple and intersecting forms of discrimination is essential for shaping inclusive laws and policies. Without their meaningful participation, policies and programmes risk overlooking the realities of those most affected⁵⁷.

A positive example is Sightsavers India's Disability Inclusive Score Card (DISC), a participatory accountability tool that empowers persons with disabilities, particularly women and girls, to monitor service provision and claim their rights under the SDGs, the CRPD, and India's Rights of Persons with Disabilities Act (2016)⁵⁸. The DISC was an OPD led process where women with disabilities played a leadership role and included consultations with women and children with disabilities, caregivers, and parents, the DISC process gathered evidence on education, healthcare, livelihoods, and social protection. This ensured that the lived experiences of women with disabilities shaped advocacy and informed reforms, translating community perspectives into measurable standards for assessing health and social services.

For the CRPD Guidelines, this initiative highlights the importance of embedding accountability mechanisms that centre the voices of women and girls with disabilities facing multiple and intersecting forms of discrimination in policymaking. States Parties should be encouraged to scale participatory tools like DISC, ensure meaningful engagement of diverse women with disabilities and their organisations (OPDs), and institutionalise community-driven monitoring to build equitable and gender-responsive systems of care.

Further information

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⁵⁷ CRPD Article 4 – [General Obligations](#)

⁵⁸ Sightsavers (2021) [Disability Inclusive Score Card Learning Document](#)