



Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits

Final Report

May – 2021

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EUROPEAN COMMISSION

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Manuscript completed in May 2021

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Luxembourg: Publications Office of the European Union, 2021

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PDF ISBN 978-92-76-19930-4

doi:10.2767/429261

KE-02-20-456-EN-N

Executive Summary

INTRODUCTION

The recognition of disability status and the allocation of related benefits are matters of national competence and there is no mutual recognition between Member States. This creates difficulties for persons with disabilities travelling to another EU country, where they are often not treated equally to nationals of that country, as their disability cards or status is/might not be recognised outside of their own country.

The Commission has been working with the Member States and civil society (European Disability Forum) since 2013 to address this situation and to facilitate the right to free movement for persons with disabilities. The aim was to create a voluntary system of mutual recognition between Member States based on a single European model disability card associated to a number of benefits freely identified by Member States.

The **EU Disability Card** (hereafter the Card) pilot initiative was financed under the Rights, Equality and Citizenship Programme 2014-2020¹ and implemented via eight pilot projects in 2016-2018. It aimed to promote the rights of persons with disabilities and to support the voluntary mutual recognition of the disability status in eight participating Member States: Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania, and Slovenia.

The Card provided access to certain disability benefits in the sectors of culture, leisure, sports and transport. National service providers in these sectors could voluntarily adhere to the Card's scheme. This means that the package of benefits provided in each Member State depended on the number and type of participating service providers. Once they joined the Card's scheme, service providers were obliged to offer the same benefits they provided to nationals with disabilities also to Cardholders from other participating Member States.

In addition to the definition of their national package of benefits, Member States were left free to decide on the implementation and functioning of the national Card's system in terms of eligibility criteria, production, printing and establishment of anti-fraud measures. Member States were also required to develop information campaigns aimed at users and service providers and to create a national website with clear information about the benefits provided. National websites had to be in an accessible format and linked with the EU webpage².

Aim of the study

The study aimed **to analyse the implementation of the Card** pilot action in the eight participating Member States, and **to assess the Card's usefulness and cost-effectiveness** across countries. To this end, the study conducted both a review of the national Card systems and a cross-border analysis, looking at the added value brought by the Card towards the mutual recognition of disability status and the free movement of persons with disabilities across Member States. The analysis provides sound conclusions and recommendations that will allow the European Commission to consider the most appropriate follow-up to the pilot action, complementing also the evaluation of the European Disability Strategy 2010-2020.³

¹ https://ec.europa.eu/justice/grants1/programmes-2014-2020/rec/index_en.htm.

² <https://ec.europa.eu/social/main.jsp?catId=1139>

³ European Commission (2010), "European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe", Brussels, 15.11.2010 COM(2010) 636 final, available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM%3A2010%3A0636%3AFIN%3Aen%3APDF>.

The study focused on the assessment of the pilot action's relevance, effectiveness, efficiency and – indirectly – coherence, EU added value and transferability. The study ran between August 2019 and July 2020 and looked at the progress of implementation in respective Member States and the results achieved thus far (the pilot action started in 2016). Stakeholders across all participating Member States were consulted during the study, including Disability Card National Organisations (DCNOs), public authorities concerned with disability matters at the national level, relevant civil society organisations, service providers and persons with disabilities.

EVALUATION RESULTS

Effectiveness

The pilot project proved to be effective as it supported the implementation of a Card which contributed towards the mutual recognition of disability status in the participating Member States.⁴

The national public sector showed to be the key actor in charge of the Card's management, in **cooperation** with both private sector and civil society organisations. Private entities are generally responsible for the Card's production and delivery. With few exceptions, the **eligibility criteria** to receive the Card are the same used to receive national benefits, thus subjects recognised as persons with disabilities according to national legislation may automatically receive the Card. No statistical data are available on the number of eligible persons. However, using the number of Cards expected to be printed by each participating Member State as a proxy,⁵ the overall number of estimated Cards is 317,000⁶ and, since the launch of the pilot project, 315.731 Cards were produced.

In all issuing Member States, the Card is physically printed in credit card format using a **common design** and including the EU logo so that it can be easily identified across the Union. **Information on the Card** is in English and includes personal data of the Cardholder, i.e. a photo, name, surname, date of birth, along with the Card's serial number and the expiry date. The **application process** is mainly online, and it is generally perceived as being user-friendly. The main **benefits provided** include free entrance to Cardholders as well as price reduction in the four sectors in scope – culture, leisure, sport and transport - and, in some cases, benefits are extended also to the assistants of persons with disabilities.

The study confirmed that the use of the Card boosted higher participation of persons with disabilities in the **culture** and **leisure** sectors: about 30% of Cardholders perceive their personal cultural (and leisure) participation to have increased fairly or very much due to the Card, while 33% consider their cultural participation to have increased only slightly and the remaining 37% believe their cultural participation did not increase at all. The situation is less positive with respect to **sport** participation. More than 60% of respondents report their sport participation not to have increased at all, while only less than 20% think their own participation in sport activities has increased fairly or very much as a result of the Card. The **transport** sector is covered in few Member States and several consulted stakeholders raised the need to include transport within all the national Card's schemes in order to promote the mobility of persons with disabilities. Overall, views are polarised regarding **tourism abroad**, with more than 35% of respondents reporting a fair or large increase, while around 45% report they did not increase their tourism activities abroad at all by having the Card. **Cross-border mobility** was facilitated, in some countries, through the use of public incentives to enhance the participation of national transport providers. This was the

⁴ The Card was issued in six out of 8 participating Member States.

⁵ The number of estimated cards is provided in the EU Disability project proposals submitted by participating Member States.

⁶ No data were available for Finland.

case of Finland, which also proved to be the Member State where Cardholders reported the highest use of the Card.

Specific **socio-economic categories** seem to have benefited more from the Card, in particular, people with lower educational attainment and those in employment. While the higher impact on less educated Cardholders is a positive finding, the fact that other vulnerable categories (unemployed, retired, inactive) benefited less is cause of concern. Students appear to be less satisfied with the Card and used it the least. The elderly used it more for public transportation than other age groups.

Efficiency

The study found that **the pilot project proved to be efficient overall**. The **implementation cost** per Cardholder was relatively small in all Member States and is expected to decrease rapidly as the Card's take-up rate increases, considering that the Member States with most Cards printed had the lowest costs. **Production and delivery costs** are also minimal even though they vary across countries. Specifically, unit production costs ranged from €5 per Card in Finland to €0.14 per Card in Belgium and the cost of delivering the Card ranges between €0.5 in Malta and €2 per Card in Cyprus.

Overall, the evaluation found that **benefits clearly outweigh the costs** of the programme. There is no evidence that participating in the programme bears a high cost on service providers who voluntarily participate in the Card's scheme. In contrast, it appears that service providers have high **economic and social returns** due to their participation as they attract new customers and gain positive publicity. Furthermore, most consulted service providers reported to have improved the **accessibility** of their services since they joined the initiative. Possible, although limited, costs could arise from **training** their staff to recognise the Card and from **monitoring** the Card's use.

Relevance

The analysis confirmed that **the Card's objectives are still relevant** to the current needs of persons with disabilities. Overall, 1266 service providers participated in the pilot project. Different categories of stakeholders provided divergent opinions on the appropriateness of the benefits offered. Notably, the DCNOs provided positive feedback both on the types of benefits and the number of service providers covered at the national level. Yet, persons with disabilities felt that **national benefit packages should be more comprehensive** in terms of amount of service providers involved and types of benefits offered. The sectors better covering their needs are, in decreasing order, culture, leisure, sport, public and private transport.

Moreover, most stakeholders mentioned the **need to extend the Card to all Member States**. In particular, it would be important to extend it to neighbouring countries of current pilot Member States that, due to their geographical proximity, are the primary foreign travel destination of persons with disabilities. Thus, the participation of neighbouring countries in the scheme is pivotal in ensuring the relevance of the Card as a tool for increasing cross-border mobility of persons with disabilities.

Coherence

The EU Disability Card concerns the provision of services and benefits to persons with disabilities when traveling across the EU. The provision of services is one of the fundamental freedoms of EU law, thus it is a matter strongly regulated at the EU level. Hence, the assessment of the implementation of the Card cannot disregard an analysis of its coherence with the broader relevant EU legislative framework in place.

To this end, the main legislative context of reference for non-discrimination in the EU has been analysed, notably: i) the Treaty on the Functioning of the European Union (TFEU), ii) the Services Directive (2006/123/EC), iii) the Geo-blocking Regulation (Regulation EU 2018/302). The analysis aimed at understanding the extent to which the Card is consistent with these pieces of legislation together with any possible implications in terms of social inclusion of persons with disabilities in the EU.

According to the EU legislation, service providers are obliged to provide the same benefits to all EU citizens, without unjustified discrimination based on nationality. However, the voluntary nature of both Member States' and service providers' participation may raise possible discrimination in the provision of services to non-citizens with disabilities, since people from other Member States could be discriminated because they are not eligible for benefits. Indeed, the disability status is granted according to national provisions of law, with no definition of disability in place at the EU level. Thus, in the absence of a mutual recognition system of disability status across Member States, service providers may not recognise a non-citizen as a person with disabilities in accordance with national legislation. In light of this, service providers may still refuse to extend a benefit offered to nationals with disabilities to foreigners with disabilities and without breaching the EU law.

Only in case the Card was extended to all Member States and the participation of service providers was compulsory, all services and benefits provided to persons with disabilities in one Member State would be automatically extended to Cardholders from all the other Member States. Under this scenario, the Card can act as an important EU law enforcement tool. In fact, by providing for a system of mutual recognition of disability status, the Card would prevent the occurrence of situations in which service providers deny the provision of disability-related services to non-nationals with disabilities. Hence, this study acknowledges the **need to investigate how and to what extent mutual recognition could be established at the EU level** in order to ensure full compliance with the principle of non-discrimination based on disability.

EU added value

The study confirmed the EU added value of the Card and the need to assess in detail the possibility of further EU legislative steps towards its extension to all Member States. The Card was perceived as an **enabler of the mutual recognition of disability status** across Member States that would not have been feasible without the European Commission's intervention, thus **contributing towards the implementation of the European Disability Strategy 2010-2020**. Notably, the Card:

- Introduced the mutual recognition of disability status across participating Member States, that would have not been recognised without the Card;
- Has been recognised by participating service providers as an official document attesting disability status of persons with disabilities; in this light, the Card is an EU proof of disability certifying which eases the recognition of the condition of disability by service providers; this is particularly important in case of invisible impairments, since Cardholders may be granted services and benefits (e.g. priority boarding) without having to provide any additional proof of their status;
- Represents a trustworthy identification document for service providers, consequently increasing its acceptance and recognition across Europe;
- Contributed to strengthening the relevance of disability-related matters within the EU policy agenda. Notably, the establishment of national Card systems represented an opportunity to intensify the national debate on disability policies and related issues as well as on the importance of a common EU disability policy. Moreover, the Card contributed to raising awareness at the EU level of the need for further intervention towards mutual recognition of disability status across the EU.

Recommendations

- **Member States adopting the Card should cover all the four sectors in scope:** the adoption of the Card should be based on close consultations between all national relevant authorities who would be responsible for notifying the introduction of the Card to all relevant service providers in their areas of competence.
- **Participation of national service providers should be mandatory:** service providers offering benefits to nationals with disabilities prior to the Card's introduction should also offer the same benefits to foreign cardholders with disabilities. Additional costs incurred by service providers should be supported through public subsidies which are likely to increase due to a potentially higher number of persons with disabilities to be covered.
- **Service providers should follow and/or implement clear accessibility standards:** the EC should provide guidelines/legislation/standards/training to MS/national service providers on EU accessibility standards. National Law Enforcement Authorities should ensure that the services offered by participant service providers are accessible in accordance with legal obligations. Member States are encouraged to provide financial support to service providers to incentivise accessibility improvements.
- **The use of the Card should be regularly monitored at relevant levels:** the EC should provide the Member States with a standard format to collect monitoring data and develop an integrated online platform where upload them. Monitoring data shall be regularly provided (GDPR compliant) by service providers and uploaded by the DCNOs on the EC platform.
- **Consistency should be ensured in the provision of information about the Card:** in extending the programme across the EU, the EC should consider contracting a single provider to develop the website's design template, so that navigation through national platforms is also consistent for Cardholders. The DCNOs should have regular meetings, held online and convened by the EC, to share information, good practices, solutions to the problems encountered.

Résumé

INTRODUCTION

La reconnaissance du statut de personne en situation de handicap et l'attribution des prestations y relatives relèvent de la compétence nationale et il n'y a pas de reconnaissance mutuelle entre États membres de l'Union européenne (UE). Cela crée des difficultés pour les personnes en situation de handicap qui se rendent dans un autre pays de l'UE, où elles ne sont souvent pas traitées de la même manière que les ressortissants de ce pays, car leur carte ou statut d'invalidité n'est pas/peut ne pas être reconnu en dehors de leur propre pays.

La Commission a travaillé avec les États membres et la société civile (Forum européen des personnes handicapées) depuis 2013 pour remédier à cette situation et promouvoir le droit à la libre circulation des personnes en situation de handicap dans l'UE. L'objectif était de créer un système volontaire de reconnaissance mutuelle entre les États membres basé sur un modèle unique de carte européenne d'invalidité associé à un certain nombre de prestations librement identifiées par les États membres.

L'initiative pilote de la Carte européenne d'invalidité (ci-après la Carte) a été financée dans le cadre du programme Droits, égalité et citoyenneté 2014-2020⁷ et mise en œuvre via huit projets pilotes en 2016-2018. Elle a eu pour objectif de promouvoir les droits des personnes en situation de handicap et de soutenir la reconnaissance mutuelle volontaire du handicap dans huit États membres participants, à savoir la Belgique, Chypre, l'Estonie, la Finlande, l'Italie, Malte, la Roumanie et la Slovénie. La Carte a permis d'accéder à certaines prestations d'invalidité dans les secteurs de la **culture, des loisirs, des sports et des transports**. Les prestataires de services nationaux de ces secteurs ont pu adhérer volontairement au programme de la Carte. Cela signifie que l'ensemble des prestations fournies dans chaque État membre dépendait du nombre et du type de prestataires de services participants. Une fois qu'ils avaient adhéré au programme de la Carte, les prestataires de services étaient tenus d'offrir aux titulaires de Carte d'autres États membres participants les mêmes avantages que ceux qu'ils offraient aux ressortissants nationaux en situation de handicap.

En plus de la définition de leur ensemble national de prestations, les États membres étaient libres de décider de la mise en œuvre et du fonctionnement du système de la Carte nationale en termes de critères d'éligibilité, de production, d'impression et de mise en place de mesures antifraude. Les États membres étaient également tenus de développer des campagnes d'information destinées aux utilisateurs et aux prestataires de services et de créer un site web national contenant des informations claires sur les avantages fournis. Les sites web nationaux devaient être dans un format accessible et liés à la page Web de l'UE.⁸

Objectif de l'étude

L'étude visait à analyser la mise en œuvre de l'action pilote de la Carte dans les huit États membres participants et à évaluer l'utilité et le coût-efficacité de la Carte dans les différents contextes nationaux. À cette fin, l'étude a mené à la fois un examen des systèmes nationaux de la Carte et une analyse transfrontalière, prenant en considération la valeur ajoutée apportée par la Carte pour la reconnaissance mutuelle du handicap et la libre circulation des personnes en situation de handicap entre les États membres. L'analyse fournit des conclusions et des recommandations solides qui permettront à la Commission européenne d'envisager le suivi le plus approprié de l'action pilote, contribuant également à l'évaluation de Stratégie européenne 2010-2020 en faveur des personnes handicapées.⁹

⁷ https://ec.europa.eu/justice/grants1/programmes-2014-2020/rec/index_en.htm.

⁸ <https://ec.europa.eu/social/main.jsp?catId=1139&langId=fr>

⁹ Commission européenne (2010), "Stratégie européenne 2010-2020 en faveur des personnes handicapées: un engagement

L'étude s'est concentrée sur l'évaluation de la pertinence, de l'efficacité, de la rentabilité et - indirectement - de la cohérence, de la valeur ajoutée européenne et de la transférabilité de l'action pilote. Il a couvert la période d'août 2019 à juillet 2020 et a examiné les progrès de la mise en œuvre dans les États membres et les résultats obtenus jusqu'à cette date (l'action pilote a débuté en 2016). Les parties prenantes de tous les États membres participants ont été consultées au cours de l'étude, notamment les organismes nationaux en charge de la carte européenne d'invalidité (DCNO), les autorités publiques concernées par les questions relatives au handicap au niveau national, les organisations de la société civile concernées, les prestataires de services et les personnes en situation de handicap.

RESULTATS DE L'EVALUATION

Efficacité

L'efficacité du **projet pilote** a été démontrée, car il a soutenu la mise en œuvre d'une Carte qui a contribué à la reconnaissance mutuelle du handicap dans les États membres participants.¹⁰

Le secteur public national s'est révélé être l'acteur-clé en charge de la gestion de la Carte, en coopération avec le secteur privé et les organisations de la société civile. Les entités privées sont généralement responsables de la production et de la livraison de la Carte. A quelques exceptions près, les **critères d'éligibilité** pour recevoir la Carte sont les mêmes que ceux utilisés pour recevoir les allocations au niveau national de sorte que les personnes reconnues en situation de handicap selon les législations nationales peuvent automatiquement recevoir la Carte. Aucune donnée statistique n'est disponible quant au nombre de personnes éligibles. Cependant, en utilisant le nombre de Cartes devant être imprimées par chaque État membre participant comme proxy¹¹, le nombre total de Cartes estimé est de 317 000¹² et, depuis le lancement du projet pilote, 315 731 Cartes ont été produites.

Dans tous les États membres qui ont émis la Carte, cette dernière est physiquement imprimée au format carte de crédit en utilisant un **design commun** et incluant le logo de l'UE pour en faciliter l'identification dans toute l'Union. Les **informations sur la Carte** sont en anglais et comprennent les données personnelles de son titulaire, c'est-à-dire une photo, le nom, le prénom, la date de naissance, ainsi que le numéro de série de la Carte et la date d'expiration. Le **processus de candidature** se déroule principalement en ligne et est généralement perçu comme convivial. Les **principaux avantages offerts** comprennent l'entrée gratuite pour les titulaires de Carte ainsi que la réduction de prix dans les quatre secteurs concernés - culture, loisirs, sport et transport - et, dans certains cas, les avantages sont également étendus aux assistants de personnes en situation de handicap.

L'étude a confirmé que l'utilisation de la Carte a stimulé une plus grande participation des personnes en situation de handicap dans les secteurs de la **culture** et des **loisirs**: environ 30% des titulaires de Carte estiment que leur participation aux activités culturelles (et de loisirs) a augmenté sensiblement ou beaucoup en raison de la Carte tandis que 33% considèrent que leur participation aux activités culturelles n'a augmenté que légèrement et que les 37% restants pensent que leur participation aux activités culturelles n'a pas du tout augmenté. La situation est moins positive en ce qui concerne la **participation sportive**. Plus de 60% des répondants déclarent que leur participation sportive n'a pas du tout augmenté tandis que seulement moins de 20% pensent que leur participation à des

renouvelé pour une Europe sans entraves", Bruxelles, le 15.11.2010 COM (2010) 636 final, disponible à:

<https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:52010DC0636&from=FR>

¹⁰ La Carte a été émise dans six des huit Pays qui ont participé au programme.

¹¹ Le nombre estimé de Cartes est indiqué dans les propositions de projets sur la Carte européenne d'invalidité soumises par les Pays participants.

¹² Aucune donnée était disponible pour la Finlande.

activités sportives a augmenté assez ou beaucoup grâce à la Carte. Le secteur des **transports** est couvert dans peu d'États membres et plusieurs parties prenantes consultées ont souligné la nécessité d'inclure le transport dans tous les programmes nationaux de la Carte afin de promouvoir la mobilité des personnes en situation de handicap. Dans l'ensemble, les opinions sont polarisées concernant le **tourisme à l'étranger**, avec plus de 35% des répondants signalant une augmentation passable ou importante tandis qu'environ 45% déclarent qu'ils n'ont pas du tout augmenté leurs activités touristiques à l'étranger grâce à la Carte. La **mobilité transfrontalière** a été facilitée, dans certains pays, grâce à l'utilisation d'incitants financiers publics pour renforcer la participation des opérateurs de transports nationaux. C'était le cas de la Finlande, qui s'est également avérée être l'État membre dans lequel les titulaires de Carte ont signalé l'utilisation la plus élevée de la Carte.

Des **catégories socio-économiques spécifiques** semblent avoir davantage bénéficié de la Carte, en particulier les personnes à faible niveau de scolarité et celles qui ont un emploi. Bien que l'impact plus élevé sur les titulaires de Carte moins scolarisés soit une conclusion positive, le fait que d'autres catégories vulnérables (chômeurs, retraités, inactifs) en aient moins bénéficié est préoccupant. Les étudiants semblent moins satisfaits de la Carte et l'ont le moins utilisée. Les personnes âgées ont utilisée davantage pour les transports publics que les autres groupes d'âge.

Efficiences

L'étude a révélé que le **projet pilote a été globalement rentable**. Le **coût de mise en œuvre** par titulaire de Carte était relativement faible dans tous les États membres et devrait diminuer rapidement à mesure que le taux de souscription de la Carte augmente étant donné que les États membres avec le plus de Cartes imprimées ont les coûts les plus bas. **Les coûts de production et de livraison** sont également minimes même s'ils varient selon les pays. Notamment, les coûts de production unitaires allaient de 5 € par Carte en Finlande à 0,14 € par Carte en Belgique et le coût de livraison de la Carte varie entre 0,5 € à Malte et 2 € par Carte à Chypre.

Dans l'ensemble, l'évaluation a révélé que **les avantages l'emportent clairement sur les coûts** du programme. Rien ne prouve que la participation au programme entraîne un coût élevé pour les fournisseurs de services qui participent volontairement au programme de la Carte. En revanche, il apparaît que les prestataires de services ont des rendements économiques et sociaux élevés en raison de leur participation, car ils attirent de nouveaux clients et obtiennent une publicité positive. De plus, la plupart des fournisseurs de services consultés ont déclaré avoir amélioré l'**accessibilité** de leurs services depuis leur adhésion à l'initiative. Des coûts éventuels, bien que limités, pourraient résulter de la **formation** de leur personnel à la reconnaissance de la Carte et du **contrôle** de l'utilisation de la Carte.

Pertinence

L'analyse a confirmé que les objectifs de la Carte sont toujours pertinents par rapport aux besoins actuels des personnes en situation de handicap. Dans l'ensemble, 1266 fournisseurs de services ont participé au projet pilote. Différentes catégories de parties prenantes ont partagé des opinions divergentes sur la pertinence des avantages offerts. Notamment, les DCNO ont fourni des commentaires positifs tant sur les types de prestations que sur le nombre de prestataires de services couverts au niveau national. Cependant, les personnes en situation de handicap estiment que les ensembles nationaux de prestations devraient être plus complets en termes de nombre de prestataires de services concernés et de types de prestations offertes. Les secteurs qui couvrent le mieux leurs besoins sont, par ordre décroissant, la culture, les loisirs, le sport, les transports publics et privés.

En outre, la plupart des parties prenantes ont mentionné la nécessité d'étendre la Carte à tous les États membres. En particulier, il serait important de l'étendre aux pays voisins des États membres pilotes actuels qui, en raison de leur proximité géographique, sont la principale destination de voyage à l'étranger des personnes en situation de handicap. Ainsi, la participation des pays voisins au programme est essentielle pour garantir la pertinence de la Carte en tant qu'outil pour accroître la mobilité transfrontalière des personnes en situation de handicap.

Cohérence

La Carte européenne d'invalidité concerne la prestation de services et d'avantages aux personnes en situation de handicap qui se déplacent dans l'UE. La prestation de services est l'une des libertés fondamentales du droit de l'UE ; c'est donc une question fortement réglementée au niveau de l'UE. Par conséquent, l'évaluation de la mise en œuvre de la Carte ne peut faire abstraction d'une analyse de sa cohérence avec le cadre législatif européen pertinent plus large en place.

À cette fin, le principal contexte législatif de référence en matière de non-discrimination dans l'UE a été analysé, notamment : i) le traité sur le fonctionnement de l'Union européenne (TFUE), ii) la directive relative aux services dans le marché intérieur (2006/123 / CE), iii) le règlement sur le géoblocage (règlement UE 2018/302). L'analyse visait à comprendre dans quelle mesure la Carte est compatible avec ces textes législatifs ainsi que les éventuelles implications en termes d'inclusion sociale des personnes en situation de handicap dans l'UE.

Selon la législation de l'UE, les prestataires de services sont tenus de fournir les mêmes avantages à tous les citoyens de l'UE, sans discrimination injustifiée fondée sur la nationalité. Cependant, le caractère volontaire de la participation des États membres et des prestataires de services pourrait soulever d'éventuelles discriminations dans la prestation de services car les ressortissants d'États membres non participants pourraient être victimes de discrimination n'étant pas éligibles aux prestations de la Carte. En effet, le statut de personne en situation de handicap est accordé conformément aux dispositions légales nationales, sans aucune définition du handicap au niveau de l'UE. Ainsi, en l'absence d'un système de reconnaissance mutuelle du handicap dans les États membres, les prestataires de services peuvent ne pas reconnaître un non-citoyen comme une personne en situation de handicap conformément à la législation nationale. En conséquence, les prestataires de services peuvent toujours refuser d'étendre aux étrangers en situation de handicap une prestation offerte aux citoyens nationaux en situation de handicap et ce, sans enfreindre le droit de l'UE.

Ce n'est que si la Carte était étendue à tous les États membres et que la participation des prestataires de services devenait obligatoire que tous les services et prestations fournis aux personnes en situation de handicap dans un État membre seraient automatiquement étendus aux titulaires de Carte de tous les autres États membres. Dans un tel scénario, la Carte peut agir comme un important outil d'application du droit de l'UE. Grâce à la mise en place d'un système de reconnaissance mutuelle du handicap, la Carte empêcherait la survenue de situations dans lesquelles les prestataires de services refusent la prestation de services liés au handicap à des non-ressortissants en situation de handicap. Par conséquent, cette étude reconnaît la **nécessité d'examiner comment et dans quelle mesure la reconnaissance mutuelle du handicap pourrait être établie au niveau de l'UE**, afin de garantir le plein respect du principe de non-discrimination fondée sur le handicap.

Valeur ajoutée européenne

L'étude a confirmé la valeur ajoutée européenne de la Carte et la nécessité d'évaluer en détail la possibilité de nouvelles mesures législatives de l'UE en vue de son extension à

tous les États membres. La Carte a été perçue comme un **catalyseur de la reconnaissance mutuelle du handicap** dans les États membres qui n'aurait pas été possible sans l'intervention de la Commission européenne, **contribuant ainsi à la mise en œuvre de la Stratégie européenne 2010-2020 en faveur des personnes handicapées**. Notamment, la Carte :

- A introduit la reconnaissance mutuelle du handicap dans les États membres participants, qui ne se serait pas produite sans la Carte;
- A été reconnue par les fournisseurs de services participants comme un document officiel attestant le statut d'invalidité des personnes en situation de handicap; dans cette optique, la Carte peut fonctionner comme une attestation du handicap qui facilite la reconnaissance de la condition de handicap par les prestataires de services; ceci est particulièrement important en cas de handicaps invisibles, car les titulaires de Carte peuvent bénéficier de services et d'avantages (par exemple, embarquement prioritaire dans l'avion) sans avoir à fournir de preuve supplémentaire de leur statut;
- Représente un document d'identification fiable pour les prestataires de services, augmentant ainsi son acceptation et sa reconnaissance à travers l'Europe;
- A contribué au renforcement des questions liées au handicap dans l'agenda politique de l'UE. Notamment, la mise en place de systèmes nationaux de Cartes a représenté l'occasion d'intensifier le débat national sur les politiques relatives au handicap et les questions connexes ainsi que sur l'importance d'une politique européenne commune en matière de handicap. En outre, la Carte a contribué à accroître la sensibilisation au niveau de l'UE quant à la nécessité d'une intervention supplémentaire en faveur de la reconnaissance mutuelle du handicap dans toute l'UE.

Recommandations

- **Les États membres adoptant la Carte devraient couvrir les quatre secteurs concernés** : l'adoption de la Carte devrait se fonder sur des consultations étroites entre toutes les autorités nationales compétentes qui devraient être chargées de notifier l'introduction de la Carte à tous les prestataires de services concernés dans leurs domaines de compétence.
- **La participation des prestataires de services nationaux devrait être obligatoire** : les prestataires de services qui offraient des avantages aux ressortissants nationaux en situation de handicap avant l'introduction de la Carte devraient offrir les mêmes avantages aux titulaires de Carte étrangers. Les coûts supplémentaires supportés par les prestataires de services devraient être pris en charge par des subventions publiques qui sont susceptibles d'augmenter en raison d'un nombre potentiellement plus élevé de personnes en situation de handicap à couvrir.
- **Les prestataires de services devraient suivre et / ou mettre en œuvre des normes d'accessibilité claires**: la CE devrait fournir des lignes directrices / une législation / des normes / une formation aux États membres / prestataires de services nationaux sur les normes d'accessibilité de l'UE. Les autorités nationales responsables de l'application des lois devraient veiller à ce que les services proposés par les prestataires de services participants soient accessibles conformément aux obligations légales. Les États membres sont également encouragés à fournir un soutien financier aux prestataires de services pour promouvoir l'accessibilité.
- **L'utilisation de la Carte devrait être régulièrement contrôlée aux niveaux appropriés**: la CE devrait fournir aux États membres un format standard pour collecter les données de surveillance et développer une plate-forme en ligne intégrée où les télécharger. Les données de surveillance sont régulièrement fournies (conformes au RGPD) par les prestataires de services et téléchargées par les DCNO sur la plate-forme CE.
- **Les informations fournies concernant la Carte doivent être cohérentes**: en étendant la Carte à l'ensemble de l'UE, la CE devrait envisager de faire appel à un fournisseur unique pour développer le modèle de conception du site Web, afin que la navigation sur les plateformes nationales soit également cohérente pour les titulaires de Carte. Les DCNO devraient organiser des réunions régulières, tenues en ligne et convoquées par la CE, pour partager des informations, des bonnes pratiques et des solutions aux problèmes rencontrés.

Zusammenfassung

EINLEITUNG

Die Anerkennung des Behinderungsstatus und die Zuweisung der damit verbundenen Leistungen sind Sache der nationalen Zuständigkeit, und es gibt keine gegenseitige Anerkennung zwischen den Mitgliedstaaten. Dies schafft Schwierigkeiten für Menschen mit Behinderungen, die in ein anderes EU-Land reisen, wo sie häufig nicht gleichberechtigt mit Staatsangehörigen dieses Landes behandelt werden, da ihre Behindertenausweise oder ihre Behinderung außerhalb ihres eigenen Landes nicht oder möglicherweise nicht anerkannt werden. Die Kommission arbeitet seit 2013 mit den Mitgliedstaaten und der Zivilgesellschaft (Europäisches Behindertenforum) zusammen, um diese Situation anzugehen und das Recht auf Freizügigkeit für Menschen mit Behinderungen zu erleichtern. Ziel war die Schaffung eines freiwilligen Systems der gegenseitigen Anerkennung zwischen den Mitgliedstaaten auf der Grundlage einer einzigen europäischen Modellkarte für Menschen mit Behinderungen, der mit einer Reihe von durch die Mitgliedstaaten frei festgelegten Leistungen verbunden ist.

Die Pilotinitiative **EU- Ausweis für Menschen mit Behinderungen** (im Folgenden: der Ausweis) wurde im Rahmen des Programms „Rechte, Gleichstellung und Unionsbürgerschaft 2014-2020“¹³ finanziert und im Zeitraum 2016-2018 durch acht Pilotprojekte umgesetzt. Ziel war es, die Rechte von Menschen mit Behinderungen zu fördern und die freiwillige gegenseitige Anerkennung des Behinderungsstatus in den acht teilnehmenden Mitgliedstaaten (Belgien, Zypern, Estland, Finnland, Italien, Malta, Rumänien und Slowenien) zu unterstützen. Die Karte ermöglichte Personen mit Behinderungen den Zugang zu bestimmten Leistungen in den Bereichen Kultur, Freizeit, Sport und Verkehr. Nationale Dienstleister in diesen Sektoren könnten sich freiwillig an das System des Ausweises halten. Dies bedeutet, dass das Leistungspaket in jedem Mitgliedstaat von der Anzahl und Art der teilnehmenden Dienstleister abhängt. Nach dem Beitritt zum Ausweissystem waren die Dienstleister verpflichtet, Staatsangehörigen mit Behinderungen die gleichen Leistungen anzubieten, die sie auch Ausweisinhaberinnen und -inhabern aus anderen teilnehmenden Mitgliedstaaten gewährt hatten.

Neben der Definition ihres nationalen Leistungspakets konnten die Mitgliedstaaten über die Umsetzung und Funktionsweise des nationalen Ausweissystems im Hinblick auf Zulassungskriterien, Herstellung, Druck und Festlegung von Betrugsbekämpfungsmaßnahmen entscheiden. Die Mitgliedstaaten mussten außerdem Informationskampagnen für Nutzer und Dienstleister entwickeln und eine nationale Website mit klaren Informationen über die erbrachten Leistungen erstellen. Nationale Websites mussten in einem zugänglichen Format vorliegen und mit der EU-Webseite verknüpft sein.¹⁴

Ziel der Studie

Ziel der Studie war es, die **Umsetzung der Pilotaktion** in den acht teilnehmenden **Mitgliedstaaten zu analysieren** und den **Nutzen und die Kostenwirksamkeit des Ausweises** in allen Ländern zu bewerten. Zu diesem Zweck führte die Studie sowohl eine Überprüfung der nationalen Ausweissysteme als auch eine grenzüberschreitende Analyse durch, wobei der Mehrwert des Ausweises für die gegenseitige Anerkennung des Behinderungsstatus und die Freizügigkeit von Menschen mit Behinderungen in den Mitgliedstaaten untersucht wurde. Die Analyse lieferte fundierte Schlussfolgerungen und Empfehlungen, die es der Europäischen Kommission ermöglichen wird, die am besten geeigneten Folgemaßnahmen zu den Pilotmaßnahmen zu prüfen und zudem die

¹³ https://ec.europa.eu/justice/grants1/programmes-2014-2020/rec/index_en.htm.

¹⁴ <https://ec.europa.eu/social/main.jsp?catId=1139&langId=de>

Evaluierung der Europäischen Strategie für Menschen mit Behinderungen 2010-2020¹⁵ zu ergänzen.

Die Studie konzentriert sich auf die Bewertung der Relevanz, Wirksamkeit, Effizienz und – indirekt – auf die Kohärenz, den EU-Mehrwert und die Übertragbarkeit der Pilotaktion. Die Studie wurde zwischen August 2019 und Juli 2020 durchgeführt und befasste sich mit den Fortschritten bei der Umsetzung in den jeweiligen Mitgliedstaaten und den bisher erzielten Ergebnissen (Beginn der Pilotaktion war 2016). Es wurden Interessengruppen aus allen teilnehmenden Mitgliedstaaten konsultiert, darunter nationale Behindertenverbände, Behörden, die sich auf nationaler Ebene mit Behinderungsfragen befassen, relevante Organisationen der Zivilgesellschaft, Dienstleister und nicht zuletzt Menschen mit Behinderungen.

BEWERTUNGSERGEBNISSE

Wirksamkeit

Das Pilotprojekt erwies sich als wirksam, da es die Einführung eines Ausweises unterstützt, die zur gegenseitigen Anerkennung des Behinderungsstatus in den teilnehmenden Mitgliedstaaten beitrug¹⁶.

Der nationale öffentliche Sektor erwies sich in **Zusammenarbeit** mit dem privaten Sektor und Organisationen der Zivilgesellschaft als der Hauptverantwortliche für die Verwaltung des Ausweises. Private Unternehmen sind im Allgemeinen für die Herstellung und Lieferung des Ausweises verantwortlich. Mit wenigen Ausnahmen sind die **Zulassungskriterien** für den Erhalt des Ausweises dieselben, die für den Erhalt nationaler Leistungen verwendet werden. Daher können Personen, die gemäß den nationalen Gesetzen als Menschen mit Behinderungen anerkannt sind, den Ausweis automatisch erhalten. Über die genaue Anzahl der berechtigten Personen liegen keine statistischen Daten vor. Betrachtet man allerdings die von den teilnehmenden Mitgliedstaaten erwartete Anzahl von zu druckenden Karten in Höhe von 317.000, so hat man eine Richtschnur¹⁷ für die insgesamt benötigte Zahl von Karten. Tatsächlich wurden seit dem Start des Pilotprojektes 315.731 Karten gedruckt.

In allen ausstellenden Mitgliedstaaten wird der Ausweis physisch im Kreditkartenformat unter Verwendung eines **gemeinsamen Designs** und mit dem EU-Logo gedruckt, damit sie in der gesamten Union leicht identifiziert werden kann. Die **Informationen auf dem Ausweis** sind in englischer Sprache und enthalten personenbezogene Daten des Karteninhabers, d. H. ein Foto, den Namen und Nachnamen, das Geburtsdatum sowie die Seriennummer der Karte und das Ablaufdatum. Der **Bewerbungsprozess** findet hauptsächlich online statt und wird allgemein als benutzerfreundlich empfunden. Zu den **Hauptleistungen** zählen der freie Eintritt für Karteninhaber sowie Preisnachlässe in den vier beobachteten Bereichen Kultur, Freizeit, Sport und Verkehr. In einigen Fällen gelten die Leistungen auch für Assistenten von Personen mit Behinderungen. Die Studie bestätigte, dass die Verwendung des Ausweises zu einer höheren Beteiligung von Menschen mit Behinderungen im **Kultur- und Freizeitsektor** führte: Etwa 30% der Ausweisinhaberinnen und -inhaber nehmen an, dass ihre persönliche kulturelle (und Freizeit-) Teilhabe aufgrund des Ausweises stark oder sehr stark zugenommen habe, während 33% der Ansicht sind, dass ihre kulturelle Teilhabe nur geringfügig zugenommen habe. Die restlichen 37% der Karteninhaber finden, dass ihre kulturelle Teilhabe überhaupt

¹⁵ Europäische Kommission (2010), "Europäische Strategie zugunsten von Menschen mit Behinderungen 2010-2020: Erneueretes Engagement für ein barrierefreies Europa", Brüssel, 15.11.2010, KOM(2010) 636 endgültig, verfügbar auf:

<https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:52010DC0636&from=DE>

¹⁶ Die Karte wurde in sechs von acht teilnehmenden Mitgliedstaaten ausgestellt.

¹⁷ Die Anzahl der geschätzten Karten ist in den von den teilnehmenden Mitgliedstaaten eingereichten Vorschlägen für ein EU-Behindertenprojekt angegeben.

nicht zugenommen habe. In Bezug auf die Teilnahme an **Sportaktivitäten** hingegen ist die Situation weniger positiv. Mehr als 60% der Befragten geben an, dass ihre Sportbeteiligung überhaupt nicht zugenommen habe, während nur weniger als 20% der Meinung sind, dass ihre eigene Teilnahme an Sportaktivitäten aufgrund der Karte ziemlich oder sehr stark zugenommen habe. Der **Transportsektor** ist in wenigen Mitgliedstaaten abgedeckt, und mehrere konsultierte Interessengruppen haben die Notwendigkeit hervorgehoben, den Verkehr in alle nationalen Ausweissysteme aufzunehmen, um die Mobilität von Menschen mit Behinderungen zu fördern. Die Ansichten zum **Tourismus im Ausland** sind geteilt: Mehr als 35% der Befragten berichten von einem fairen oder starken Anstieg ihrer touristischen Aktivitäten, während rund 45% angeben, dass ihre Tourismusaktivitäten im Ausland durch den Ausweis überhaupt nicht gestiegen sind. **Die grenzüberschreitende Mobilität** wurde in einigen Ländern durch öffentliche Anreize erleichtert, um die Beteiligung der nationalen Verkehrsanbieter zu verbessern. Dies war der Fall in Finnland, das sich auch als ein Mitgliedstaat erwies, in dem Ausweisinhaberinnen und -inhaber die höchste Nutzung meldeten.

Bestimmte **sozioökonomische Gruppen** scheinen mehr als andere von dem Ausweis profitiert zu haben, insbesondere Menschen mit niedrigerem Bildungsabschluss und Erwerbstätige. Während die stärkeren Auswirkungen auf weniger gebildete Karteninhaber ein positiver Befund sind, gibt die Tatsache, dass andere vulnerable Gruppen (Arbeitslose, Rentner, Nicht-Erwerbstätige) weniger davon profitierten, Anlass zur Sorge. Schülerinnen und Schüler/Studenteninnen und Studenten scheinen mit dem Ausweis weniger zufrieden zu sein und haben sie am wenigsten benutzt. Ältere Menschen nutzten sie eher für öffentliche Verkehrsmittel als andere Altersgruppen.

Effizienz

Die Studie hat das **Pilotprojekt insgesamt als effizient** befunden. Die **Implementierungskosten** pro Ausweisinhaberin/Ausweisinhaber waren in allen Mitgliedstaaten relativ gering und werden voraussichtlich rasch sinken, wenn die Akzeptanzrate der Karte steigt, da die Mitgliedstaaten mit den meisten gedruckten Ausweisen die niedrigsten Kosten hatten. Die **Produktions- und Lieferkosten** sind ebenfalls minimal, obwohl sie von Land zu Land unterschiedlich sind. Insbesondere lagen die Produktionsstückkosten zwischen 5 € pro Ausweis in Finnland und 0,14 € pro Ausweis in Belgien. Die Kosten für die Lieferung der Karte liegen zwischen 0,5 € in Malta und 2 € pro Karte in Zypern.

Insgesamt ergab die Bewertung, dass die **Vorteile die Kosten des Programms deutlich überragen**. Es gibt keine Hinweise darauf, dass die Teilnahme an dem Programm für Dienstleister, die freiwillig am Programm teilnahmen, hohe Kosten verursachte. Im Gegenteil, die Dienstleister scheinen aufgrund ihrer Teilnahme **hohe wirtschaftliche und soziale Renditen** zu erzielen, da sie neue Kunden anziehen und positive Bekanntheit erlangen. Darüber hinaus gaben die meisten konsultierten Dienstleister an, die **Zugänglichkeit** ihrer Dienste seit ihrem Beitritt zur Initiative verbessert zu haben. Mögliche, wenn auch begrenzte Kosten können durch die **Schulung** des Personals zur Erkennung und durch die **Überwachung** der Verwendung der Karte entstehen.

Relevanz

Die Analyse bestätigte, dass die **Ziele des Ausweises weiterhin** für die aktuellen Bedürfnisse von Menschen mit Behinderungen **relevant** sind. Insgesamt nahmen 1266 Dienstleister an dem Pilotprojekt teil. Verschiedene Gruppen von Stakeholdern gaben unterschiedliche Meinungen zur Angemessenheit der angebotenen Leistungen ab. Insbesondere gaben die DCNOs positive Rückmeldungen sowohl zu den Leistungsarten als auch zur Anzahl der auf nationaler Ebene abgedeckten Dienstleister. Personen mit Behinderungen waren jedoch der Ansicht, dass die **nationalen Leistungspakete** hinsichtlich der Anzahl der beteiligten Dienstleister und der Art der angebotenen Leistungen

umfassender sein sollten. Die Bereiche, die ihre Bedürfnisse besser abdecken, sind in abnehmender Reihenfolge Kultur, Freizeit, Sport, öffentlicher und privater Verkehr.

Darüber hinaus erwähnten die meisten Interessengruppen die Notwendigkeit, den **Ausweis auf alle Mitgliedstaaten auszudehnen**. Insbesondere wäre es wichtig, sie auf die Nachbarländer der derzeitigen Pilotmitgliedstaaten auszudehnen, die aufgrund ihrer geografischen Nähe das primäre Auslandsreiseziel von Menschen mit Behinderungen sind. Daher ist die Beteiligung der Nachbarländer an dem Programm von entscheidender Bedeutung, um die Relevanz des Ausweises als Instrument zur Erhöhung der grenzüberschreitenden Mobilität von Menschen mit Behinderungen sicherzustellen.

Kohärenz

Der Ausweis betrifft die Bereitstellung von Dienstleistungen und Leistungen für Menschen mit Behinderungen auf Reisen in der EU. Die Erbringung von Dienstleistungen ist eine der Grundfreiheiten des EU-Rechts und daher auf EU-Ebene stark geregelt. Daher kann bei der Bewertung der Einführung des Ausweises eine Analyse ihrer Kohärenz mit dem umfassenderen einschlägigen EU-Rechtsrahmen nicht außer Acht gelassen werden.

Zu diesem Zweck wurde der wichtigste gesetzgeberische Bezugskontext für die Nichtdiskriminierung in der EU analysiert, insbesondere: i) der Vertrag über die Arbeitsweise der Europäischen Union (AEUV), ii) die Dienstleistungsrichtlinie (2006/123 / EG) iii) die Geoblocking-Verordnung (Verordnung EU 2018/302). Die Analyse zielt darauf ab zu verstehen, inwieweit der Ausweis mit diesen Rechtsvorschriften vereinbar ist, sowie mögliche Auswirkungen auf die soziale Inklusion von Menschen mit Behinderungen in der EU.

Nach dem EU-Recht sind Dienstleister verpflichtet, allen EU-Bürgern die gleichen Vorteile zu bieten, ohne ungerechtfertigte Diskriminierung aufgrund der Staatsangehörigkeit. Der freiwillige Charakter der Teilnahme von Mitgliedstaaten und Dienstleistern kann jedoch zu möglicher Diskriminierung bei der Erbringung von Dienstleistungen für Nichtstaatsangehörige mit Behinderungen führen. Personen aus anderen Mitgliedstaaten könnten diskriminiert werden, da sie keinen Anspruch auf Leistungen haben. Der Behinderungsstatus wird gemäß den nationalen gesetzlichen Bestimmungen bestimmt, ohne dass auf EU-Ebene eine Definition der Behinderung vorliegt. In Ermangelung eines Systems zur gegenseitigen Anerkennung des Behinderungsstatus in allen Mitgliedstaaten können Dienstleister einen Nichtstaatsangehörigen gemäß den nationalen Rechtsvorschriften möglicherweise nicht als Menschen mit Behinderungen anerkennen. In Anbetracht dessen können sich Dienstleister jederzeit ohne Verstoß gegen das EU-Recht weigern, eine Leistung für Staatsangehörige mit Behinderungen auf Ausländer mit Behinderungen auszudehnen.

Nur im Falle der Ausdehnung des Ausweises auf alle Mitgliedstaaten und einer obligatorischen Teilnahme von Dienstleistern, würden alle Dienstleistungen und Leistungen für Menschen mit Behinderungen in einem Mitgliedstaat automatisch auf Ausweisinhaberinnen und -inhaber aus allen anderen Mitgliedstaaten ausgedehnt werden. In diesem Szenario kann der Ausweis ein wichtiges Instrument zur Umsetzung von EU-Recht sein. In der Tat würde der Ausweis durch die Bereitstellung eines Systems zur gegenseitigen Anerkennung des Behinderungsstatus das Auftreten von Situationen verhindern, in denen Dienstleister die Erbringung von Dienstleistungen für Ausländer mit Behinderungen verweigern. In dieser Studie wird daher die **Notwendigkeit** beschrieben, **zu untersuchen, wie und inwieweit eine gegenseitige Anerkennung auf EU-Ebene hergestellt werden kann**, um die vollständige Einhaltung des Grundsatzes der Nichtdiskriminierung aufgrund einer Behinderung sicherzustellen.

EU-Mehrwert

Die Studie bestätigte den EU-Mehrwert des Ausweises und die Notwendigkeit, die Möglichkeit weiterer gesetzgeberischer Schritte der EU zur Ausweitung auf alle Mitgliedstaaten im Detail zu prüfen. Der Ausweis wurde als Wegbereiter für eine gegenseitige Anerkennung des Behinderungsstatus in allen Mitgliedstaaten angesehen, die ohne die Intervention der Europäischen Kommission nicht möglich gewesen wäre, und trug somit zur Umsetzung der Europäischen Behindertenstrategie 2010-2020 bei. Insbesondere:

- hat der Ausweis die Einführung der gegenseitigen Anerkennung des Behinderungsstatus in allen teilnehmenden Mitgliedstaaten gewährleistet, die sonst nicht anerkannt worden wäre.
- Der Ausweis wurde von den teilnehmenden Dienstleistern als offizielles Dokument anerkannt, das den Behinderungsstatus von Menschen mit Behinderungen bestätigt; in dieser Hinsicht ist die Karte ein EU-Nachweis für die Zertifizierung von Behinderungen, der die Anerkennung einer Behinderung durch Dienstleister erleichtert. Dies ist besonders wichtig bei nicht-sichtbaren Behinderungen, da Ausweisinhabenden und -inhabern unter bestimmten Voraussetzungen Dienstleistungen und Vorteile (z. B. Priority Boarding) gewährt werden, ohne dass ein zusätzlicher Nachweis ihres Status erbracht werden muss.
- Der Ausweis stellt ein vertrauenswürdiges Dokument für Dienstleister dar und erhöht dadurch dessen Akzeptanz und Anerkennung in ganz Europa.
- Der Ausweis hat zur Stärkung der Relevanz von Fragen zu Behinderungen innerhalb der politischen Agenda der EU beigetragen. Insbesondere die Einrichtung der nationalen Ausweissysteme bot die Gelegenheit, die nationalen Debatten über die Behindertenpolitik und verwandte Themen sowie über die Bedeutung einer gemeinsamen EU-Behindertenpolitik zu intensivieren. Darüber hinaus trug der Ausweis dazu bei, das Bewusstsein auf EU-Ebene für die Notwendigkeit weiterer Maßnahmen zur gegenseitigen Anerkennung des Behinderungsstatus in der gesamten EU zu schärfen.

Empfehlungen

- **Die Mitgliedstaaten, die den Ausweis einführen, sollten alle vier Bereiche abdecken:** Die Einführung des Ausweises sollte auf enger Zusammenarbeit der nationalen Behörden beruhen, die dafür verantwortlich sind, allen relevanten Dienstleistern die Einführung der Karte in ihren Gebieten mitzuteilen.
- **Die Teilnahme nationaler Dienstleister sollte verbindlich sein:** Dienstleister, die vor Einführung der Karte gewisse Leistungen für Staatsangehörige mit Behinderungen anbieten, sollten ausländischen Karteninhabern mit Behinderungen die gleichen Leistungen anbieten. Zusätzlich anfallende Kosten für Dienstleister sollten durch öffentliche Subventionen gedeckt werden. Diese werden wahrscheinlich steigen, wenn mehr Menschen mit Behinderungen Leistungen beziehen .
- **Dienstleister sollten klare Barrierefreiheitsstandards befolgen und / oder umsetzen:** Die EK sollte Mitgliedstaaten / nationalen Dienstleistern Richtlinien / Gesetze / Standards / Schulungen zu EU-Barrierefreiheitsstandards zur Verfügung stellen. Die nationalen Strafverfolgungsbehörden sollten sicherstellen, dass die von den teilnehmenden Dienstleistern angebotenen Dienste gemäß den gesetzlichen Verpflichtungen zugänglich sind. Die Mitgliedstaaten werden aufgefordert, Dienstleistern finanzielle Unterstützung zu gewähren, um Anreize für Verbesserungen der Barrierefreiheit zu schaffen.
- **Die Verwendung des Ausweises sollte auf relevanten Ebenen regelmäßig überwacht werden:** Die EK sollte den Mitgliedstaaten ein Standardformat zur Erfassung von Daten für das Monitoring und zur Entwicklung einer integrierten Online-Plattform zur Verfügung stellen, auf der die Daten hochgeladen werden. Daten für das Monitoring werden regelmäßig von Dienstleistern bereitgestellt (GDPR-konform) und von den nationalen Behindertenverbänden auf die EK-Plattform hochgeladen.
- **Bei der Bereitstellung von Informationen über den Ausweis sollte Konsistenz gewährleistet sein:** Bei der Ausweitung des Programms auf die EU sollte die EK erwägen, einen einzigen Anbieter mit der Entwicklung der Designvorlage der Website zu beauftragen, damit die Navigation auf nationalen Plattformen auch für Ausweisinhaber konsistent ist. Die nationalen Behindertenverbände sollten regelmäßige online-Sitzungen abhalten, die von der Europäischen Kommission einberufen werden, um Informationen, bewährte Praktiken und Lösungen für aufgetretene Probleme auszutauschen.

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LIST OF ABBREVIATIONS

AVIQ	Agence pour une Vie de Qualité (Agency for a Quality Life)
CBSS	Crossroads Bank for Social Security
CCOD	Cyprus Confederation of Organisations of the Disabled
CFO	Cyprus Football Organisation
CJEU	Court of Justice of the European Union
CRPD	Commission for the Rights of Persons with Disability
CSO	Civil Society Organisation
DAP	Disability Action Plan
DCNO	Disability Card National Organisation
DG EMPL	Directorate General for Employment, Social Affairs & Inclusion
DGASPC	General Directorates of Social Assistance and Child Protection
DPI	Disabled Peoples' International
DPO	Disabled People Organisation
DSIPD	Department for Social Inclusion of Persons with Disabilities
EAA	European Accessibility Act
EASPD	European Association of Service Providers for Persons with Disabilities
EDF	European Disability Forum
ENAT	European Network for Accessible Tourism
EU	European Union
FC	Football Clubs
FISH	Federazione Italiana per il Superamento dell'Handicap (Italian Federation for Overcoming Handicap)
FPS	Federal Public Service
FTE	Full-time equivalent
GDPR	General Data Protection Regulation
HR	Human resources
IA	Integration allowance
ICB	Increased Child Benefit
ICT	Information and Communication Technology
INPS	Istituto Nazionale della Previdenza Sociale (National Institute for Social Security)
IRA	Income Replacement Allowance
ISCED	International Standard Classification of Education

KVPS	Kehitysvammaisten Palvelusäätiö, Servicestiftelsen för personer med utvecklingsstörning (Service Foundation for People with an Intellectual Disability)
LEDHA	Lega per i diritti delle persone con disabilità (League for the Rights of People with Disabilities)
MDDSZ	Ministry of Labour, Family, Social Affairs and Equal Opportunities
MS	Member State
NADPDCA	National Authority for Persons with Disabilities, Children and Adoption
NAPD	National Authority for Persons with Disabilities
NGO	Non-governmental organisation
NSIOS	Nacionalni Svet Invalidskih Organizacij Slovenije (National Council of Disability Slovenia)
NUTS	Nomenclature of Territorial Units for Statistics
PA	Public Authority
PPP	Purchasing power parity
REC	Rights, Equality and Citizenship Programme
SID	Special Identity Card
STEA	Sosiaali- ja terveysterveystöjen avustuskeskus (Funding Centre for Social Welfare and Health Organisations)
STM	Sosiaali- ja terveysterveystöjen ministeriö (Ministry of Social Affairs and Health)
SWOT	Strengths, Weaknesses, Opportunities, and Threats
TFEU	Treaty on the Functioning of the European Union
THL	Terveyden ja hyvinvoinnin laitos (National Institute for Health and Welfare)
UNCRPD	UN Convention on the Rights of Persons with Disabilities
VAPH	Vlaams Agentschap voor Personen met een Handicap (Flemish Agency for Persons with Disabilities)

Member States

BE	Belgium
CY	Cyprus
EE	Estonia
FI	Finland
IT	Italy
MT	Malta
RO	Romania

1. Introduction

This Final report is the third and last deliverable under Specific Contract VC/2019/0491 following the Request for Services VT/2018/022 “*Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits*”, within the Framework Contract for the “*Provision of services related to the implementation of Better Regulation Guidelines*” VT/2016/027.

1.1. Objective and scope of the evaluation

The study aims at reviewing, analysing and assessing the implementation of the EU Disability Card (hereinafter, the Card) pilot action in the eight participant Member States (MS): Belgium (BE), Cyprus (CY), Estonia (EE), Finland (FI), Italy (IT), Malta (MT), Romania (RO) and Slovenia (SI). The final objective of the study is to **assess the usefulness and cost-effectiveness of the Card’s implementation** in different national contexts with a view to facilitating its wider extension throughout the European Union (EU). The analysis aims at delivering sound conclusions and recommendations that will allow the European Commission (EC) to consider the most appropriate follow-up to the pilot action. It will, furthermore, contribute to the exchange of good practices on the provision of services to persons with disabilities and to the evaluation of the European Disability Strategy 2010-2020¹⁸.

The study covers the eight Member States involved in the pilot project and the following categories of stakeholders:

- Disability Card National Organisations (DCNOs);
- Public Authorities (PAs) concerned with the Card at the national level;
- Civil society organisations (CSOs) concerned with disability, both at the EU level and national level;
- Service providers (SPs), both private and public;
- Persons with disabilities (DPs).

1.2. Content of the Final Report

The Final Report is structured into the following sections:

- **Introduction** presenting the objective of the study and the content of the report (Chapter 20);
- **Background on the EU Disability Card** including an overview of the EU context of reference for the study together with the description of the policy and institutional

¹⁸ European Commission (2010), “European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe”, Brussels, 15.11.2010 COM(2010) 636 final, available at:

<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM%3A2010%3A0636%3AFIN%3Aen%3APDF>.

arrangements in place in the participating Member States prior to the introduction of the Card (Chapter 2);

- **Evaluation questions** presenting the list of questions addressed throughout the study (Chapter 3);
- **Research methodology** including the process methodology and related limitations as well as robustness of findings (Chapter 4);
- **Implementation state of play** including details on the Card's setup and implementation across the eight participating Member States (Chapter 5);
- **Analysis and results of the study** covering all relevant topics to support key conclusions and recommendations (Chapter 6);
- **Conclusions** based on the evidence gathered throughout the study, including both desk research and consultation with relevant stakeholders (Chapter 6);
- **Recommendations** including the caveat(s) behind each recommendation (Chapter 8);

Annexes include:

- Country fiches;
- Mapping of service providers;
- Mapping of costs;
- Case studies;
- Stakeholder consultation;
- Synopsis report;
- SWOT analysis;
- List of key references.

2. Background of the EU Disability Card

2.1. The EU policy context

The European Commission has supported the development of a European disability policy since 1983. This has been achieved through a succession of action programmes. Notably, the *Community Social Action Programme on the Social Integration of Handicapped People 1983-88* and *HELIOS I (Second) Community Social Action Programme for Disabled People (1988)* were aimed at promoting networking among rehabilitation and education professionals. The third disability action programme (*HELIOS II*) marked an important shift in the Commission's approach, aiming 'to promote equal opportunities for and the

integration of disabled people¹⁹. The equal opportunities approach was set out in a 1996 Communication²⁰. Furthermore, the European Disability Forum (EDF), a platform for the representation of persons with disabilities at the EU level, was established in 1997 with support from the European Commission.

The rights of persons with disabilities were also spelled out in European treaties and legal documents. First, in 1997 the Treaty of Amsterdam, Article 13 (now Article 19 in the Treaty on the Functioning of the European Union (TFEU)), specifies that the Council '*acting unanimously (...) may take appropriate action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation*'. The Treaty of Amsterdam paved the way for the adoption of the Equal Treatment Framework Directive in 2000 (Council Directive 2000/78/EC), which requires Member States to take measures to forbid various forms of employment discrimination on the grounds of disability (as well as religion, belief, age and sexual orientation). Second, the 1997 Treaty of Amsterdam (Declaration 22) requires the European Council to consider the needs of persons with disabilities when adopting EU legislation that affects the establishment and the functioning of the internal market. Third, the 2000 Charter of Fundamental Rights of the European Union states that '*the Union recognises and respects the right of persons with disabilities to benefit from measures designed to ensure their independence, social and occupational integration and participation in the life of the community*' (Article 26). Article 21 of the Charter prohibits any discrimination based on disability. Finally, Article 10 of the TFEU requires that the EU combat discrimination based on disability when defining and implementing its policies and activities.

In addition, the rights of persons with disabilities have been addressed in several sectors, such as transport, public procurement, Information and Communications Technology (ICT), and Structural Funds under the umbrella of the first EU Disability Action Plan (DAP) from 2003-2010, which focused on accessibility (2008-2009), active inclusion (2006-2007) and employment (2004-2005)²¹.

A milestone EU initiative came with the Union's accession to the UN Convention on the Rights of Persons with Disabilities (UNCRPD), a process that started in 2007 and concluded in 2011²². The Convention requires that parties protect and safeguard all human rights and fundamental freedoms of persons with disabilities, including liberty of movement (Article 18). In the framework of the UNCRPD, and with the aim to support Member States in fulfilling their obligations, a strengthened European Disability Strategy was launched in 2010 for the period 2010-2020²³. The strategy intends to empower persons with disabilities so that they can fully enjoy their rights and benefit from participating in society and in the EU economy, notably through the Single Market. The strategy aimed to achieve a "barrier-free Europe" by intervening in eight key areas: accessibility, participation, equality, employment, education and training, social protection, health, and external action. Participation, in particular, is recognised as being crucial in overcoming obstacles to the social inclusion of persons with disabilities²⁴.

However, even though EU legislation has made progress in protecting the rights of persons with disabilities, there is evidence that they continue to suffer from direct or indirect

¹⁹ Community Social Action Programme on the Social Integration of Handicapped People, 1983-88, (1981); HELIOS I (Second) Community Social Action Programme for Disabled People (1988) OJ L104/38; HELIOS II (Third) Community Action Programme to Assist Disabled People (1993) OJ L56/30.

²⁰ Communication of the Commission on Equality of Opportunity for People with Disabilities – COM (96) 406, 30.07.1996.

²¹ Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Situation of disabled people in the European Union: the European Action Plan 2008-2009 (SEC (2007)1548)* COM/2007/0738 final */.

²² See at : https://ec.europa.eu/commission/presscorner/detail/en/IP_11_4.

²³ COM (2010)636 final.

²⁴ Accessibility, participation, equality, employment, education and training, social protection, health, external action.

discrimination or are at risk of discrimination²⁵. This leads to various social and economic disadvantages, including a higher risk of poverty or social exclusion (29.2% of persons with disabilities compared to 19.2% of persons without disabilities in the EU in 2018)²⁶, exclusion deriving from reduced participation in the labour force²⁷, and lower participation in education²⁸. Indeed, Disabled People Organisations (DPOs) consistently argue that persons with disabilities cannot fully enjoy free movement on an equal basis as other EU citizens as they are faced with additional barriers when accessing goods and services²⁹.

2.2. Baseline

All Member States in scope have **disability policies** in place to grant specific rights to persons with disabilities and provide them with services and benefits. All Member States are party to the **UN Convention on the Rights of Persons with Disabilities (UNCRPD)**. The following table provides an overview of key pieces of legislation regulating disability matters in the Member States.

Table 1 – Relevant legislation on disability matters

MS	Legal reference
BE ³⁰	<ul style="list-style-type: none"> • Law of 27 February 1987 on disability allowances; • Royal Decree of 6 July 1987 on income replacement allowance and the integration allowance; • Ministerial Decree of 30 July 1987 establishing categories and guidelines to assess the degree of autonomy to grant the integration allowance; • Royal Decree of 5 March 1990 on the allowance for assistance to the elderly; • Royal Decree of 22 May 2003 on the procedure concerning the processing of files concerning disability allowances; • Royal Decree of 17 July 2006 implementing Article 4, §2, of the Law of 27 February 1987 relating to disability allowances;
CY	<ul style="list-style-type: none"> • Law No 127(I) of 2000 on Persons with Disabilities³¹;
EE	<ul style="list-style-type: none"> • Law of 27 January 1999 on Social Benefits for Disabled Persons³²; • Law 8 of 29 February 2016³³ on the conditions and procedures for determining the severity of the disability and the conditions of support for the disabled person of working age³⁴; • Regulation of the Minister of Social Affairs No 61 of 11 November 2016 on the Disabled person's card - information and issuing procedures; • Law of 15 July 2013, "Museum Act"; • Law of 1 October 2000, "Estonian Public Transportation Act";
FI	<ul style="list-style-type: none"> • Law No 380 of 1987, "Disability Service Act"³⁵;

²⁵ See at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2018-handbook-non-discrimination-law-2018_en.pdf and Clifford J (2011), The UN Disability Convention and its Impact on European Equality Law, The Equal Rights Review, vol. 6 available at <https://www.corteidh.or.cr/tablas/r27132.pdf>.

²⁶ See at: <https://ec.europa.eu/eurostat/data/database>; table [h1th_dpe010]

²⁷ International Labour Organisation, *Factsheet: Discrimination at Work in Europe*, available at: http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_decl_fs_90_en.pdf and <https://www.disability-europe.net/downloads/1045-europe-2020-data-people-with-disabilities-tables-eu-silc-2017>.

²⁸ See at: <https://www.disability-europe.net/downloads/1045-europe-2020-data-people-with-disabilities-tables-eu-silc-2017>.

²⁹ See at: <http://www.edf-feph.org/freedom-movement>

³⁰ These legislations are enacted at the national level. Additional regional legislations establish the right to reasonable accommodation and non-discrimination for persons with disabilities.

³¹ See at: http://www.cylaw.org/nomoi/indexes/2000_1_127.html.

³² See at: <https://www.riigiteataja.ee/en/eli/ee/511122019003/consolide>.

³³ See at: <https://www.riigiteataja.ee/akt/101032016011>.

³⁴ See at: <https://www.riigiteataja.ee/akt/108052020010>.

³⁵ See at: <https://www.finlex.fi/fi/laki/smur/1987/19870380>.

MS	Legal reference
	<ul style="list-style-type: none"> • Law No 519 of 1977, “Act on Intellectual Disabilities”³⁶; • Law No 1301 of 2014, “Social Welfare Act”³⁷; • Law No 359 of 2015, “Sign language act”;
IT	<ul style="list-style-type: none"> • Law No 104 of 5 February 1992, “Framework law for assistance to and social integration and rights of persons with disabilities”; • Law No 3 of 9 March 2009, “Ratification and execution of the United Nations Convention on the Rights of Persons with Disabilities, with Optional Protocol, done in New York on 13 December 2006 and establishment of the National Observatory on the Condition of Persons with Disabilities”; • Decree of the President of the Italian Republic of 4 October 2013 on the adoption of the two-year action program for the promotion of the rights and integration of people with disabilities; • Regulation No 7 of 9 January 2019 amending decree No 507 of 11 December 1997, concerning the establishment of the entrance ticket to state monuments, museums, galleries, ancient excavations cities, parks and monumental gardens.
MT	<ul style="list-style-type: none"> • Act No 10 of 1987, “Social Security Act”; • Act No 1 of 2000, “Equal Opportunities (Persons with Disability) Act”; • Act No 2 of 2012 on Disability Matters (Amendments); • Act No. 24 of 2016, “Equal Opportunities (Persons with Disability) (Amendment) Act”;
RO	<ul style="list-style-type: none"> • Law No. 448 of 6 December 2006 on the protection and promotion of persons with disabilities; • Law No. 221 of 2010 ratifying the UN Convention of persons with disabilities; • Law No. 292 of 2011 on Social Services; • Law No. 197 of 2012 on the quality of social services; • Law No. 111 of 2018 on fiscal provisions for persons with disabilities, which modifies Law No. 227 of 2015 on the Fiscal Code;
SI	<ul style="list-style-type: none"> • Law No 94/10 of 26 November 2010 on the Equalisation of Opportunities for Persons with Disabilities Act; • Act of 21 April 2016 on the protection against discrimination.

Source: Authors’ elaboration based on desk research and consultation with the DCNOs

The UNCRPD recognises that ‘disability is an evolving concept’³⁸ and ‘Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments that, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others’³⁹. The long-term dimension of the impairment – including physical, mental, intellectual or sensory impairment – is also mentioned at the European level (definition of disability provided by the Court of Justice of the EU (CJEU))⁴⁰. As shown in Table 2, national relevant provisions of law include definitions of disability that do not always explicitly refer to all types of impairments or interactions with various barriers mentioned in the UNCRPD.

Table 2 - Definition of disability

MS	Definition of disability
BE ⁴¹	<p>Belgian legislation does not provide a single definition of disability at the national level. However, there are regional legislations establishing different criteria for access to disability allowances, depending on the situation.</p> <p>Since 2009, BE has ratified the UNCRPD, which has become directly applicable in the country. This means that all newly adopted legislation has to comply with the definition enshrined in the UNCRPD</p>

³⁶ See at: <https://www.finlex.fi/fi/laki/smur/1977/19770519>.

³⁷ See at: <https://www.finlex.fi/fi/laki/ajantasa/2014/20141301>.

³⁸ UNCRPD, 2006, p. 1.

³⁹ UNCRPD, 2006, p. 4.

⁴⁰ Judgment of the Court of Justice (Second Chamber) of 11 April 2013, *Ring*, joined cases C-335/11 and C-337/11, ECLI:EU:C:2013:222. Judgment of the Court of Justice (Fourth Chamber) of 18 December 2014, *Kaltoft*, C-354/13, ECLI:EU:C:2014:2463. Judgement of the Court of Justice (Grand Chamber) of 18 March 2014, *Z.*, C-363/12, ECLI:EU:C:2014:159.

⁴¹ In the absence of a shared national legal definition of disability since different definitions apply in different regions, Belgian courts follow case law of the CJEU.

MS	Definition of disability
CY ⁴²	The definition of disability in CY is that of the UNCRPD, which has been adopted as the national definition of disability. Accordingly, a 'person with disabilities' is defined as a person who has a long-term, physical, mental, intellectual or sensory impairment, which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others
EE ⁴³	Disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person, which, in conjunction with different relational and environmental restrictions, prevents participation in social life on equal basis with others. The following degrees of disability are identified by the law: <ul style="list-style-type: none"> • Profound disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs constant personal assistance, guidance or supervision twenty-four hours a day; • Severe disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs personal assistance, guidance or supervision in every 24-hour period; • Moderate disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs regular personal assistance or guidance outside his or her residence at least once a week.
FI ⁴⁴	A person with disability is considered to be a person who, due to an injury or illness, has long-term special difficulties in performing normal life activities.
IT ⁴⁵	Disability is defined as a physical, psychological or sensory impairment, stable or progressive, which is the cause of difficulties in learning, relationships or integration in working life and that determines a process of social disadvantage or marginalisation.
MT ⁴⁶	National legislation adopts the UNCRPD definition of disability, i.e. a long-term physical, mental, intellectual or sensory impairment that, in interaction with various barriers, may hinder one's full and effective participation in society on an equal basis with others (Equal Opportunities (Persons with Disability) Act, Chapter 413).
RO ⁴⁷	Under the national legislation, disability is defined as the incapability to undertake daily activities under normal circumstances, thus requiring protection measures to support physical recovery, integration and social inclusion in accordance with the UNCRPD definition that Romania ratified with Law number 221/2010 ⁴⁸ .
SI	Citizens of the Republic of Slovenia with permanent residence in the Republic of Slovenia or foreigners with permanent residence in the Republic of Slovenia, namely: <ul style="list-style-type: none"> • Persons with Disabilities I., II. and III. categories under the Pension and Disability Insurance Act (all disabled workers - decisions based on Act) • Recognised physical impairment (PI): around 90% PI due to loss of vision, around 70% PI due to hearing loss or at least 80% PI, if the PI is cumulative and the minimum percentage for one PI is at least 70% (Pension and Disability Insurance Act - physical impairment decisions) • Persons with disabilities according to the Vocational Rehabilitation and Employment of Disabled Persons Act (Decision by Employment Service of Slovenia) • Recognised status of Persons with Disabilities according to the Act Regulating the Training and Employment of Disabled Persons (Decision by Employment Service of Slovenia) • Status acquired under the Act Concerning Social Care of Mentally and Physically Handicapped Persons (Decisions by Centre for Social Work or, rarely, by Pension and Disability Insurance Institute of Slovenia) Obtained status of Persons with Disabilities according to the regulations of other EU Member States.

Source: Authors' elaboration based on desk and field research

⁴² Law n. 3420 of 21/7/2000.

⁴³ See at: <https://www.riigiteataja.ee/en/eli/ee/509012015003/consolide>.

⁴⁴ Finnish Human Rights Centre, Disability Services Act (380/1987). Available at: <https://www.finlex.fi/fi/laki/smur/1987/19870380>.

⁴⁵ LEGGE 5 febbraio 1992, n. 104, Legge-quadro per l'assistenza, l'integrazione sociale e i diritti delle persone handicappate. (GU n.39 del 17-2-1992 - Suppl. Ordinario n. 30). Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1992-02-05:104:vig_.

⁴⁶ See at: https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=55768&p_country=MLT&p_count=323.

⁴⁷ See at: http://www.mmuncii.ro/pub/imagemanager/images/file/Legislatie/LEGI/L448-2006_rep.pdf.

⁴⁸ Hurjui, Ioan; Hurjui, Cristina Marcela. *General Considerations on People with Disabilities*. Rom J Leg Med [26] 225-228 [2018]. <http://www.rjlm.ro/system/revista/46/225-228.pdf>

As already stated above, **the definitions of disability included in relevant national legislation** do not always explicitly refer to all types of impairments mentioned in the UNCRPD. Table 3 provides details about the types of impairments mentioned by the different national definitions of disability.

Table 3 - Definitions of disability across Member States

MS	Impairment					Unequal participation	
	Long-term	Physical	Mental	Intellectual	Sensory	Society	Professional life
BE	✓	✓	✓				✓
CY	✓	✓	✓	✓		✓	✓
EE		✓	✓			✓	
FI	✓						
IT	✓	✓	✓		✓	✓	✓
MT	✓	✓	✓	✓	✓	✓	
RO						✓	
SI	✓	✓	✓		✓	✓	

Source: Authors' elaboration based on desk and field research

The **assessment of disability status** is the responsibility of the national social insurance institutions in three Member States (BE, FI and IT) and falls under the purview of the national public authority in charge of disability policies in four Member States (CY, EE, MT and SI)⁴⁹. In BE, the assessment of disability status is performed at the regional level by the four national authorities responsible for disability policies. In CY, the assessment is issued by the Disability Assessments Centres within the DCNO. In EE, the assessment is undertaken by multidisciplinary teams in local municipalities composed of social workers, family doctors and family nurses⁵⁰. In FI, the disability assessment is carried out directly by the social insurance institution. In IT, the disability assessment is carried out by a medical-legal commission at the Local Health Agencies (ASLs) or directly by INPS⁵¹. In MT, the assessment is carried out directly by the national public authority in charge of disability policies. In RO, the assessment is performed by the General Directorates of Social Assistance and Child Protection (DGASPC)⁵² with the support of the Ministry of Labour⁵³. In SI, the Administrative Units⁵⁴, under the direction of the Ministry of Public Administration, are responsible for assessing disability status.

⁴⁹ Public Authorities: CY - Department for Social Inclusion of Persons with Disabilities; IT – INPS; MT - Ministry for the Family and Social Solidarity; SI - Pension and Invalidity Insurance Institute of Slovenia.

⁵⁰ Care Work with People with Disabilities. Tallin Health Care College, Learning Materials for Social and Health Care Students' Foreign Placements / ETM II" (FI-06-B-P-PP-160 704). DG Education and Culture Lifelong Learning Programme. See at : https://www.ttk.ee/public/EST_Disabilities_08.pdf.

⁵¹ See at: <https://www.inps.it/nuovoportaleinps/default.aspx?itemdir=50004>.

⁵² The Directorate-Generals for Social Assistance and Child Protection (DGASPC) are public institutions offering local welfare services in Bucharest and at country level. Overall there are 47 DGASPC, i.e. six in Bucharest and one in each of the 41 counties in which RO is organised.

⁵³ See at: <http://anpd.gov.ro/web/informatii-utile/evaluarea-si-incadrarea-in-grad-de-handicap/>.

⁵⁴ State administration in SI is organised in 58 administrative units, corresponding to the area of one or several local communities. See at: <https://www.gov.si/en/state-authorities/administrative-units/>.

Prior to the Card's introduction, service providers participating in the pilot did not provide services and benefits to foreigners with disabilities⁵⁵. As far as nationals with disabilities are concerned, the **provision of benefits outside the Card's scheme** varies across Member States and is either mandatory or left to the discretion of service providers⁵⁶. Notably, it is left to the discretion of service providers in all sectors in scope in BE, FI and MT. In CY and SI, it is at the discretion of the service providers in the culture, leisure and sport sectors; however, transport service providers receive subsidies from the government to provide benefits to nationals with disabilities according to specific criteria. In EE, benefits in the fields of culture and transport are mandated by law for certain categories of persons with disabilities⁵⁷. In IT, the provision of benefits to persons with disabilities is mandated by law in the culture, leisure and public transport⁵⁸ sectors. In RO, there are different provisions of law depending on the degree of disability⁵⁹. National legislation recognises four levels of disability and legally mandated benefits only concern accentuated or severe disabilities, excluding moderate or light disabilities⁶⁰.

Two Member States have a National Disability Card in place that offers benefits in the four sectors in scope (EE and MT). Participation in these National Disability Cards is voluntary for service providers⁶¹. In the other Member States (BE, CY, FI, IT, SI, RO), when available, benefits could be generally accessed by providing a medical certificate attesting the holder's disability status. Similar documentation is generally required for personal assistants as well proving their participation in disability organisations or other documentation of their status as assistants, whenever national disability policies confer special provisions to them in addition to those granted to the accompanied person with a disability. In CY, a Disability Booklet offered limited benefits to nationals with disabilities prior to the introduction of the Card. Public transport operators provide benefits to nationals with disabilities in all Member States outside the Card's scheme⁶². An exception is public airline operators, which envision disability-related benefits only in FI. Member States in which benefits are provided in the Card's sectors, but outside the Card's scheme, are illustrated in Table 4.

⁵⁵ Focus group on recruiting and management of service providers across Member States and consultation with the DCNOs.

⁵⁶ In this study, the analysis is limited to the four sectors covered by the Card in order to allow for comparison and overall coherence. Information was retrieved through consultation with stakeholders, including interviews, surveys and Focus groups.

⁵⁷ According to the Museum Act, access to state museums is free of charge for the following categories and their personal assistants: children with disabilities up to 16 years old and persons with profound disabilities aged 16 or more. According to the Estonian Public Transportation Act, transportation on domestic routes is free of charge for the following categories: children with disabilities, persons with severe disabilities aged 16 and older, persons with severe visual impairments and their personal assistant/guide dog.

⁵⁸ Concerning road transport, according to various regional legislations, many municipalities and regions offer free transportation services to certain categories of persons with disabilities, depending on the degree of disability. As regards railway transport, the main national railway company offers discounts to persons with disabilities and free tickets for their personal assistants on certain routes.

⁵⁹ It is compulsory for national (provided by the state) cultural/sports/touristic/leisure institutions to facilitate accessibility for persons with disabilities. As such, children with disabilities and their assistants receive free access to museums, shows, artistic and sports exhibitions. Adults with severe disabilities and their assistants also benefit from free access to the above activities. Adults with light or medium disabilities benefit from the same reduced-price entry as students.

⁶⁰ Focus group on the recruitment and management of service providers.

⁶¹ Consultation with stakeholders, including interviews, survey and Focus groups.

⁶² Focus groups on the transport sector with public transport operators/authorities. No information was provided for EE,

Table 4 - Sectors⁶³ covered outside the Card's scheme⁶⁴

MS	BE	CY	EE	FI	IT	MT	RO ⁶⁵	SI
Culture	×	✓	✓	×	✓	✓	✓	×
Leisure	×	✓	✓	×	✓	✓	✓	×
Sport	×	✓	✓	×	×	✓	✓	×
Public transport	✓	- ⁶⁶	✓	✓	✓	✓	✓	✓
Private transport	×	✓	✓	×	✓	✓	✓	✓

Source: Authors' elaboration based on desk research and consultation with the DCNOs

Finally, the provision of benefits to nationals with disabilities outside the Card's scheme is occasionally supported by national public subsidy schemes⁶⁷. This is the case in EE, MT and SI⁶⁸ regarding transport operators. In EE, subsidies are envisioned also in the field of culture. In RO, public service providers offering benefits to persons with disabilities were supported directly by the state budget, both at the national and local level (e.g. Ministry Culture, National Sports Agency, local administrations' budgets). In the remaining Member States, the provision of disability-related benefits in the sectors in scope was not supported by any public subsidy scheme (BE, CY, FI and IT).

In all Member States, accessibility legislation establishes accessibility requirements for service providers in the four sectors in scope but they are very different except for those that relate to EU legislation (Regulations). Table 5 provides the main pieces of legislation regulating accessibility matters in the Member States.

Table 5 - Relevant legislation to accessibility⁶⁹

MS	National legislation	Culture	Leisure	Sport	Transport
BE	<ul style="list-style-type: none"> Flemish Region: Decree of the Flemish Government of 5 June 2009 establishing a regional urban planning ordinance on accessibility; Walloon Region: Walloon Code of Town and Country Planning, Urbanism, Heritage and Energy (CWATUPE). More specifically, articles 414 and 415 of the CWATUPE deal with the accessibility of public buildings; Brussels-Capital Region: Regional Town Planning Regulation (RRU). More specifically, chapter four deals 	✓	✓	✓	✓

⁶³ This table refers only to financial benefits provided to persons with disabilities and/or their personal assistant. Other types of benefits/services (e.g. accessibility requirements and assistance services) have not been considered since these have not been included in the Card's national package of benefits.

⁶⁴ The sectors marked with a "tick" are those where either a National Disability Card was in place or where benefits were state-mandated. In the sectors marked with an "x", although not state-mandated or foreseen under a National Disability Card, benefits may still be provided at the discretion of service providers.

⁶⁵ As set forth in national legislation, legally mandated benefits in RO only concern accentuated or severe disabilities, excluding moderate or light disabilities.

⁶⁶ There are no public transport operators in CY.

⁶⁷ Focus groups on the management and recruitment of service providers and focus groups with public transport authorities/operators.

⁶⁸ In SI public transport operators received subsidies to provide benefits to a limited target pool among persons with disabilities, including war veterans and civilian war invalids.

⁶⁹ When not differently specified, the information included in this table was provided by the DCNOs.

MS	National legislation	Culture	Leisure	Sport	Transport
	with accessibility of buildings for people with reduced mobility and chapter seven deals with the road system, its access and its surroundings.				
CY	<ul style="list-style-type: none"> • Law No 127(I) of 2000⁷⁰ on Persons with Disabilities; • Law No of 8 (III)2011) ratifying the UN Convention of persons with disabilities⁷¹; • Regulation No 61H on roads and buildings⁷². 	✓	✓	✓	✓
	<ul style="list-style-type: none"> • Law No 112 (I) of 2004)⁷³ on Electronic Communications and Postal Services. 		✓		
	<ul style="list-style-type: none"> • Decree of 2003 issued under the 2000-2005 Laws on Vehicle Approval, "The Bus and Pulman Decree". 				✓
EE	<ul style="list-style-type: none"> • Law No 103 of 15 July 2013⁷⁴, "Museum Act". 	✓			
	<ul style="list-style-type: none"> • Law No 2 of 1 October 2015, "Public Transportation Act"⁷⁵. 				✓
FI ⁷⁶	<ul style="list-style-type: none"> • Law No 519 of 1977 on Intellectual Disabilities; • Law No 380 of 1987, "Disability Service Act"; • Law No 1301 of 2014, "Social Welfare Act"; • Law No 21 of 2004, "Non-Discrimination Act". 	✓	✓	✓	✓
IT ⁷⁷	<ul style="list-style-type: none"> • Law n. 104 of 5 February 1992, "Framework law for assistance to and social integration and rights of persons with disabilities". 	✓	✓	✓	✓
	<ul style="list-style-type: none"> • Decree of the Ministry of Public Works n. 236 of 14 June 1989 on technical requirements necessary to guarantee the accessibility, adaptability and visitability of private buildings and public residential buildings, for the purpose of overcoming and eliminating architectural barriers; • Decree n. 503 of 24 July 1996 of the President of the Republic; 	✓	✓	✓	

⁷⁰ See at: http://www.cylaw.org/nomoi/enop/non-ind/2000_1_127/full.html.

⁷¹ See at: http://www.cylaw.org/nomoi/indexes/2011_3_8.html.

⁷² See at: http://www.cylaw.org/nomoi/enop/non-ind/2004_1_112/full.html, http://www.cylaw.org/nomoi/enop/non-ind/0_96/full.html.

⁷³ See at: http://www.cylaw.org/nomoi/enop/non-ind/2004_1_112/full.html.

⁷⁴ See at: <https://www.riigiteataja.ee/akt/119032019103>.

⁷⁵ See at: <https://www.riigiteataja.ee/en/eli/ee/520092017001/consolide>.

⁷⁶ This information was retrieved based on desk research.

⁷⁷ This information was retrieved base on desk research.

MS	National legislation	Culture	Leisure	Sport	Transport
	<ul style="list-style-type: none"> Decree of the President of the Republic No 380 of 6 June 2001 on the elimination of architectural barriers in buildings, spaces and public services. 				
	<ul style="list-style-type: none"> Law No 21 of 15 January 1992; Law n. 37 of 14 February 1974 on free public transport for guide dogs for blind persons, "Framework law on passenger transportation via non scheduled public services". 				✓
MT	<ul style="list-style-type: none"> Act No 1 of 2000, Chapter 413 of the Laws of Malta, "The Equal Opportunities (Persons with Disabilities) Act". 	✓	✓	✓	✓
	<ul style="list-style-type: none"> Law No 448 of 6 December 2006 regarding persons with disabilities, Chapter IV, Art. 61-71. Only applicable to state-owned public utility buildings. 	✓			
RO ⁷⁸	<ul style="list-style-type: none"> Law No 448 of 6 December 2006 regarding persons with disabilities, Chapter IV, Art. 61-71. Applicable to state-owned public-utility buildings. According to Art. 68, privately-owned hotels must make at least one room handicap-accessible, must mark the entrance through tactile markers and must install elevators with tactile signs. 		✓		
	<ul style="list-style-type: none"> Law No 448 of 6 December 2006 regarding persons with disabilities, Chapter IV, Art. 61-71. 			✓	✓
SI ⁷⁹	<ul style="list-style-type: none"> Law No 94/10 of 26 November 2010, "Equalisation of Opportunities for Persons with Disabilities Act"⁸⁰; Law of 2018 implementing EU Directive 2016/2102 "Accessibility of Websites and Mobile Applications Act"⁸¹. 	✓	✓	✓	✓

Source: Authors' elaboration based on desk research and consultation with the DCNOs

3. Evaluation questions

The evaluation questions aim at assessing the Card's effectiveness, efficiency and relevance by analysing the current implementation of the Card system in the participating Member States.

⁷⁸ This information was retrieved base on desk research.

⁷⁹ This information was provided by the NSIOS.

⁸⁰ Article 8 of the Equalisation of Opportunities for Persons with Disabilities Act, with provisions on accessibility of goods and services for public, states, that any kind of discrimination on the basis of disability is forbidden. It also states that discrimination in terms of access to goods and services available to the public means, in particular, the refusal to offer goods and services available to the public, to a disabled person or to offer them to a disabled person under different and inferior conditions.

⁸¹ See at: <https://nio.gov.si/nio/asset/zakon+o+dostopnosti+spletisc+in+mobilnih+aplikacij+zdsma?lang=en>.

Table 6 - Evaluation questions and criteria

Criteria	Question
Effectiveness	EQ 1 - What is the Card system's dedicated legal and administrative setup for its management, production, distribution and assessment of eligibility?
Effectiveness	EQ 2 - Regarding cost-effectiveness and efficiency, how effective was co-operation between the bodies involved in the management and running of the card while putting the system in place and during the implementation of the project as a whole?
Effectiveness	EQ 3 - How effective was the consultation of those key stakeholders who were not directly involved in the management and running of the Card, including persons with disabilities and/or their representative organisations? To what extent were their comments considered in formulating the framework and management of the Card?
Effectiveness	EQ 4 - What are the main features of the system (eligibility criteria, databases of beneficiaries and of benefits/services provided, etc.)?
Effectiveness	<p>EQ 5 - How does the Card compare across Member States, with respect to its production/application/security?</p> <p>a. Was there any transnational cooperation among the pilot Member States in its production/security? Was there any cooperation in general between the eight pilot MS?</p> <p>b. Who was in charge of managing such cooperation? Are there any relevant accomplishments in relation to that?</p>
Effectiveness	<p>EQ 6 - What are the national packages - and kinds - of benefits provided? If transport is included, what means of transport are included and is the transport public or private?</p> <p>a. Did all countries include benefits/services in all the areas mentioned in the TS?</p>
Relevance	EQ 7 - Are the benefits or services provided across all fields that are meaningful to persons with disabilities?
Relevance	EQ 8 - Were a sufficient number of benefit/service providers convinced to join the system to ensure that the Card had value for persons with disabilities?
Effectiveness	EQ 9 - Have individual problems been identified relating to using the Card? Are there clear and effective complaint mechanisms that lead to effective remedies for such problems?
Effectiveness	EQ 10- How effective were awareness-raising activities for the Card's promotion?
Effectiveness	EQ 11- To what extent did the Card contribute to the development of accessible tourism and, consequently, to the improved inclusion of persons with disabilities?
Effectiveness	EQ 12 - To what extent did the Card facilitate the travel of persons with disabilities to other Member States participating in the pilot project?
Effectiveness	EQ 13 - To what extent did the Card help persons with disabilities gain better access to transport and/or to participate in cultural and sporting events?
Efficiency	EQ 14 - To what extent did the Card contribute to generating proportionate and additional socio-economic benefits for stakeholders?

Criteria	Question
Efficiency	EQ 15 - What were the financial consequences from the mutual recognition of the Card between countries participating in the pilot project?

4. Research methodologies

4.1. Process-methodology

The study was initiated on August 19, 2019 and was expected to be concluded by May 18, 2020. However, due to the COVID-19 health crisis and the related impact on data and information collection, the project was extended until July 18, 2020. Data collection relied on both desk and field research.

4.1.1. Desk research

The desk research focused on a vast range of European and national-level documents, including:

- **EC policy documents and initiatives** to gain a deeper understanding of the policy context, the Card’s background and the main features of the pilot projects;
- **Member State documentation and initiatives**, including reports on technical implementation, financial data, dissemination and awareness-raising information as well as indicators on the pilot projects;
- **Other relevant documentation**, including press releases and websites on the Card, disability benefits and entitlements across the Member States, EDF survey results⁸² and recommendations;
- **Sitography**, including the websites relevant to the study.

Annex 8 includes a full list of relevant references.

4.1.2. Field Research

Field research was aimed at mapping the implementation of the Card in the participant Member States and/or the evolution of the Card systems in place. The field research was organised in two rounds of consultations. Detailed information about the field research process is provided in Annex 5 (stakeholder consultation) and Annex 6 (synopsis report).

The **first round** of consultations included:

- Interviews: **two interviews were conducted with organisations concerned with disability issues at the European level⁸³. Moreover, ten interviews were conducted at**

⁸² Results are published in EDF Analysis Report “Towards a European Mobility Card”, EDF 2012.

⁸³ Disabled Peoples’ International (DPI) – Europe and European Disability Forum (EDF).

the national level, eight with the DCNOs (BE, CY, EE, FI, IT, MT, RO and SI), one with the Italian National Social Security Institute (INPS) and a final interview with the National Council of Disabled People's Organisation of Slovenia (NSIOS). Interviews at the European level were aimed at gathering cross-country information on the functioning of Card;

- Online survey: the online survey was addressed to a broad number of stakeholder categories and the overall responses collected amounted to 175 as of January 13, 2020. Table 7 provides the number of stakeholders per category that were consulted through the online survey in the different Member States.

Table 7 – Number of survey respondents per stakeholder category

MS	DCNO	Public Authorities	Civil society organisation	Service providers	Persons with disabilities	Total
BE	1	3	6	1	13	24
CY	1	1	7	3	17	29
EE	1	-	4	4	18	27
FI	1	3	10	3	2	19
IT	1	-	3	-	7	11
MT	1	-	2	5	-	8
RO	1	25	3	2	12	43
SI ⁸⁴	1	-	3	-	1	6
EU	-	-	8	-	-	8
Total	8	32	47	18	70	175

The **second round** of consultations included:

- Interviews: one interview was conducted with an organisation at the European level that is concerned with disability issues⁸⁵;
- **Online survey**: two questionnaires were addressed to Cardholders and service providers with the aim of gathering information on the Card benefits, both in terms of increased participation of persons with disabilities and increased customer flows for the service providers. Overall, 21 service providers and 363 persons with disabilities replied.
- **Focus groups**: six focus groups were conducted. Four focus groups had a national scope, whereas two examined specific topics across different Member States. The focus groups were performed online through videoconferencing tools and each lasted around two hours. Information retrieved during the focus groups allowed for:
 - The collection of information to inform the whole evaluation study, particularly paragraphs 6, 7 and 9 on the effectiveness, relevance and added value of the Card;
 - The triangulation of information gathered through other collection tools (desk analysis, online survey and interviews).

Table 8 shows the overall number and type of stakeholders involved.

⁸⁴ The DCNO from SI initially replied to the questionnaire for the CSOs, hence not all questions aimed at the DCNOs were covered. The interview with the DCNO was conducted also in order to fill the information gaps, and the comprehensive responses have been included in the Interim Report. Additionally, the DCNO provided the missing information by responding to the online survey.

⁸⁵ European Network for Accessible Tourism (ENAT).

Table 8 – Stakeholders involved through focus groups

MS	DCNO	Public Authorities	Civil society organisation	Service providers	Persons with disabilities	Private actors	Total
BE	1	4				1	6
CY	1		3				4
MT	1			2			3
RO	1				4		5
Public transport		2		6			8
Service providers	5	1					6
Total	9	7	3	8	4	1	32

4.1.3. Use of the information

Data and information gathered through both desk and field research were triangulated and informed the six Tasks constituting the evaluation study. Notably:

- **Task 1 – Mapping of the EU Disability Card System in the eight pilot Member States:** this task aimed at providing a comprehensive and detailed overview of the pilot projects. All the retrieved information was used both to answer the evaluation questions and related conclusions and to draft the Country Fiches included in Annex 1.
- **Task 2 - Thematic case studies:** this task sought to investigate how key critical areas for the introduction of the Card have been addressed/performed in different Member States, combining targeted desk research and interviews/focus groups. **The information gathered through the focus groups was particularly informative for the case studies.**
- **Task 3 - Stakeholder consultation:** this task aimed at validating and complementing the data gathered from the mapping exercise as well as collecting insights, perceptions and opinions from the most relevant stakeholders involved in or affected by the Card's introduction. All the field research activities fall under this Task.
- **Task 4 - Design and delivery of a sound and re-usable methodology to assess the efficiency and transferability of the pilot action:** this task sought to develop the most appropriate dataset, indicators and evaluation methods to assess the efficiency of the Card systems and their transferability. In the absence of administrative data on the Card's use (see section 4.2), two rounds of online survey were developed in order to gather information relevant to this Task. This study acknowledges the importance of establishing reliable monitoring systems at the Member State level to enable a sound measurement of the Card's use (see sections 6.1.4 and 8), thus allowing for the overall assessment of the Card's impact. However, should a more systematic monitoring not be in place, the designed surveys and the analyses performed during this study could be used to assess the implementation of the Card in other Member States joining the Card's scheme. The findings achieved under this Task, together with information from all the other Tasks, informed the SWOT analysis included in Annex 7 to this report and the identification of key takeaways for new Member States adopting the Card as presented in Table 34.
- **Task 5 - Recording stakeholders' views on the results of Tasks 1-4:** this task focused on gathering stakeholder feedback on the results from the mapping activity

in view of validating, correlating, integrating or adapting the findings for the formulation of sound conclusions and recommendations. The Country Fiches, along with the SWOT analysis and the key takeaways, were shared with the DCNOs in order to gather their feedback/input on information gathered and conclusions reached per Member States. Moreover, the findings from the focus groups and related reporting were shared with participants for their considerations. All of their comments/input were duly taken into account when finalising this report.

- **Task 6 - Conclusions and recommendations:** this task aimed at integrating results from Tasks 1, 3 and 4, as well as the findings related to Task 2 to respond to the study questions and provide general conclusions on the usefulness and cost-effectiveness of the Card setup and implementation in the different Member States, along with relevant recommendations on the best way forward.

4.2. Limitations of the selected methodology and robustness of findings

The major issues encountered during the study and the mitigation measures undertaken are summarised below (Table 9).

Table 9 – Key issues and mitigation measures

Issue	Mitigation
<p>Limited availability of administrative data: the GDPR restrictions prevented direct access to the relevant databases and data protection measures in place made it difficult to extract large amount of information even in anonymous form. In addition, it was not possible to retrieve information on the number of the persons with disabilities who are accessing the provided benefits, let alone their socio-demographic information, because service providers do not collect data on the Card's use by beneficiaries at the national level.</p>	<p>Two survey rounds were carried out to gather information directly from the Cardholders on their use of the Card and related level of satisfaction as well as their participation in cultural and sports events. Support from the EC was requested to strengthen data request to the DCNO; GDPR issues emerged for all Member States, nonetheless.</p> <p>Use of the EU-SILC 2015 database at the Member State level allowed for the extraction of data on persons with disabilities with socio-demographic characteristics that are similar to the group of Cardholders in 2020. Hence, a comparison of the levels of participation in cultural, leisure, and sport events between the two groups could be performed.</p>
<p>Limited data on costs: monitoring data on the costs entailed by Card's use are not available, either at the EU or at the national level.</p>	<p>The study attempted to collect information on costs through specific questions included in the online survey, aimed at expanding the dataset to include costs borne by the service providers, and at gaining more information on their eventual increase or loss in revenues associated with the Card.</p>
<p>Limited data on costs: data on the production costs and share of national contribution are not available for all participating Member States.</p>	<p>Data on the Card's production costs and the relative EU and national contributions were requested of the DCNOs. However, for Belgium and Finland, the data were not shared. In the case of Belgium, the DCNO reported that the data are not available since the production and delivery of the Card are under the responsibilities of the regional authorities who do not share costs with the DCNO. As for Finland, the DCNO did not reply to the request despite subsequent EC reminders.</p>
<p>Low response rate in the online survey: the number of responses received is limited, hampering a comprehensive understanding of both the benefits and costs entailed in the Card's scheme in the different Member States.</p>	<p>Given the paucity of answers from service providers, amounting to 39 service providers between the two rounds, often not exceeding 10 for a single MS, the cost-benefit analysis for the service providers included simulation techniques, based on web-identified ticket prices and Card's-associated discounts.</p> <p>As the costs related to specific activities were not covered – i.e. not committed – for all Member States, the</p>

Issue	Mitigation
	comparison was made for the total costs and for the unique activity which every Member State sustained, i.e. the printing of the Card. The analysis of the Card's cost-effectiveness occurred in two main stages. First, with respect to the Cardholders, a cross-country analysis was performed by weighting the perceived benefits against the national planning and implementation costs. Second, the benefits and costs of participating service providers were assessed based on data retrieved from direct consultation with a sample of participating service providers in each pilot Member State.
Difficulties in the organisation of focus groups: the scheduling of the focus groups took a lot of time for several reasons. First, under pandemic circumstances, most stakeholders were home-based, with part-time availability, making the identification of common dates very complex. Second, institutional actors were often overloaded by the lock-down adaptation process, with limited availability to participate.	High flexibility was allowed during the scheduling process, and dates have been changed/adapted to stakeholder needs and availability. In very specific cases, stakeholders have been allowed to contribute through written contributions/individual interviews.
Impact of COVID-19: the restrictive measures prevented the organisation of physical/face-to-face focus groups	Face-to-face focus groups were replaced with videoconference meetings.

5. State of play of implementation⁸⁶

The implementation of the Card was promoted by the Commission in order to advance the rights of persons with disabilities and to support the mutual recognition of disability status in the eight participating Member States. According to the Call for proposals for the Card⁸⁷, the pilot project had two main priorities:

- **Priority 1** - Setting up or reinforcing the respective Disability Card National Organisations (DCNOs: governmental or non-governmental entities). This priority is supported by two main activities:
 - The organisational setup or reinforcement of the DCNO, including the reinforcement of human resources (such as hiring of additional staff) and/or material resources (such as purchasing the necessary equipment and software);
 - Issuing the Card (using the common design), i.e. production, printing and the establishment of anti-fraud measures.
- **Priority 2** - Establishing the respective national packages of benefits that Member States are ready to mutually recognise and taking the necessary national measures to make that possible. This priority is supported by three main activities:
 - Collection of data, creation of a list of benefits to provide, for example by means of a database;
 - An information and publicity campaign both aimed at users and service providers;

⁸⁶ Information included in this chapter was mainly gathered through the online survey and the interviews with the DCNOs. When information was retrieved through desk analysis, relevant references are indicated in footnotes.

⁸⁷ VP/2015/012, CALL FOR PROPOSALS to support national projects on a mutually recognised European Disability Card and associated benefits (<https://ec.europa.eu/social/main.jsp?catId=629&langId=en&callId=456&furtherCalls=yes>).

- Creating a national website on responsible bodies and benefits provided with clear information and in an accessible format and linking it with the EU webpage.

Member States were left free to decide on the implementation and functioning of the national Card system in terms of eligibility criteria, sectors covered - the culture, leisure, sport and transport target areas - and the definition of their national package of benefits. Thus, different Card's schemes are in place across the eight participating Member States. Table 10 provides an overview of the status of the Card's implementation across the eight Member States.

Table 10 – Status of the Card's implementation across Member States

MS	BE	CY	EE	FI	IT	MT	RO	SI
<i>Priority one</i>								
Organisational setup or reinforcement of the DCNO	✓	✓	✓	✓	✓	✓	✓	✓
Issuing of the Card	✓	✓		✓		✓	✓	✓
<i>Priority two</i>								
Definition of the benefits provided	✓	✓		✓		✓	✓	✓
Awareness raising	✓	✓	✓	✓	✓	✓	✓	✓
Development of national Card's websites	✓	✓		✓	✓	✓	✓	✓

Source: Authors' elaboration based on desk and field research

With regard to Priority 1, all eight participating Member States set up the DCNOs as the key actor responsible for the Card's scheme at the national level. In most Member States, the DCNO is a Public Authority (BE, CY, EE, MT, RO, SI), while in two Member States a civil society organisation was identified (FI, IT).

Table 11 – Organisational set up

MS	Actor identified	Resources allocated
BE	Federal Public Service Social Security	0 ⁸⁸
CY	Department for Social Inclusion of Persons with Disabilities	0 ⁸⁹
EE	Estonian Social Insurance Board	_90
FI	Service Foundation for People with an Intellectual Disability	_91

⁸⁸ <https://socialsecurity.belgium.be/fr/au-sujet-de-lorganisation>.

⁸⁹ The Department for Social Inclusion of Persons with Disabilities was established on 1.1.2009, according to the Ministers' Council Decision n. 66.763 dated 6.2.2008, as a new Department of the Ministry and Social Insurance. Source: http://www.mlsi.gov.cy/mlsi/dsid/dsid.nsf/dsipa04_en/dsipa04_en?OpenDocument.

⁹⁰ Data not provided by the DCNO.

⁹¹ Data not provided by the DCNO.

MS	Actor identified	Resources allocated
IT	Italian Federation for Overcoming Handicap	. ⁹²
MT	Commission for the Rights of Persons with Disability	0 ⁹³
RO	National Authority for Persons with Disabilities ⁹⁴	0
SI	Ministry of Labour, Family, Social Affairs and Equal Opportunities	€20,000

Source: Authors' elaboration based on desk research

Six Member States proceeded with **issuing** the Card (BE, CY, FI, MT, RO, SI). Different schemes were developed for Card production, printing, delivery and the establishment of anti-fraud measures (see section 0).

In terms of Priority 2, the national **packages of benefits** have been defined in all the Member States where the Card has been issued, covering different sectors (Table 12).

Awareness-raising activities were organised in all Member States (Table 12). In general, promotion activities were meant to disseminate information on the project among persons with disabilities as well as service providers and civil society organisations.

Table 12 - Awareness-raising activities

MS	Brochures in multiple languages	Communication campaigns	Social media campaigns	Press conference	Events, conferences & meetings	Public debates and roundtable	Training sessions
BE	✓	✓	✓	✓	✓	×	×
CY	✓	✓	×	✓	×	×	×
EE	×	✓	×	×	✓	×	×
FI	✓	✓	✓	×	✓	✓	×
MT	×	✓	✓	✓	✓	×	×
RO	✓	✓	✓	✓	✓	×	✓
SI	✓	✓	✓	✓	✓	✓	×

Source: Authors' elaboration based on desk and field research

⁹² Data not provided by the DCNO.

⁹³ The Commission for the Rights of Persons with Disability was established since 1987.

⁹⁴ Represented at local level by the General Directorate of Social Assistance and Child Protection.

All Member States, except EE⁹⁵, set up a **national website**⁹⁶ for the Card. The SI national Card's website was the only that explicitly mentioned compliance with WCAG.2.0⁹⁷, whereas the other six websites only included some general references to accessibility. In most Member States, the establishment of the website was outsourced either to a private entity (CY, MT, RO) or to a civil society organisation (SI). In FI and IT, the website was developed in-house by the DCNO. In BE, the website was established through collaboration between the DCNO and a private entity, AnySurfer, which was responsible for developing accessibility to the website⁹⁸. National websites include information about the reasons for the Card's introduction in the seven Member States (BE, CY, FI, IT, MT, RO, SI), the eligibility criteria (BE, FI), the application process (BE, CY, FI), the benefits provided in the different sectors (CY, MT, SI), as well as a list of service providers (BE, CY, FI, MT, RO, SI), a FAQ section (BE, RO) and a section where service providers can notify Cardholders about their participation in the Card's scheme (BE, FI, SI). In MT, the website also incorporates the application form to request the Card. Information on the service providers participating in the Card's scheme is generally uploaded and regularly updated on the national websites that are directly linked to the European website for the Card. The DCNO is responsible for the website's development and regular updating information. The frequency of information updates varies across Member States: while CY and FI update their websites whenever new information is presented, this occurs every two to three months in BE and MT, and in RO every seven to 11 months, while updating occurs only once a year in IT. In SI, information is not regularly updated.

6. Analysis and results of the study

6.1. Effectiveness

6.1.1. Stakeholders involved in the Card system

Key findings

Finding 1 - The implementation of the Card is based on three main governance models depending on the specific Member State: centralised, vertical multilevel and horizontal multilevel. The public sector is the key actor in charge of the Card management, in cooperation with both the private sector and civil society organisations (EQ 1).

Finding 2 - Stakeholders agreed that the cooperation mechanisms – involving both public-public and public-private cooperation – were successful in ensuring the proper implementation of the Card at the national level (EQ 2).

Finding 3 - Consultations with stakeholders not directly involved in the management and running of the Card were carried out in all pilot Member States. Overall, civil society organisations, including DPOs, were satisfied with their involvement, whereas the involvement of persons with disabilities was perceived as limited (EQ 3).

⁹⁵ The Estonian Chamber of Disabled Persons established a website (<https://www.epikoda.ee/soodustused>) in 2017 when the Card pilot project took place in Estonia. However, this website is not the EU Disability Card's website and the information available is not updated.

⁹⁶ BE: <https://eudisabilitycard.be/en>; CY: <http://www.eudisabilitycard.gov.cy/en/page/europaiki-karta-anapirias>; FI: <https://www.vammaiskortti.fi/>; IT: <http://www.disabilitycard.it/it/>; MT: <https://www.eudisabilitycard.org.mt/>; RO: <http://dizab.euocard.gov.ro>; SI: <http://www.invalidska-kartica.si>.

⁹⁷ The website from SI is the only website explicitly reporting "As of January 2017, the site complies with the WCAG 2.0 Web Content Design Guidelines, available at <http://www.w3.org/TR/WCAG20/>. Compliance corresponds to AA availability level."

⁹⁸ AnySurfer is a Belgian organisation that promotes the accessibility of websites, apps, and digital documents for persons with disabilities. Full accessible websites obtain the "AnySurfer" quality label. AnySurfer is a quality mark for accessible websites.

Finding 4 – Awareness activities were organised in all pilot Member States to disseminate information about the Card. The DCNOs reported to be satisfied with the capacity of the awareness-raising activities to reach their targets (EQ 10).

Governance model

The **administrative set up** of the Card and the number of actors involved vary across Member States. Three main governance models have been identified (Table 13).

Table 13 – Governance models

Model	MS
Centralised	CY, MT
Vertical multilevel	BE, RO, SI
Horizontal multilevel	EE, FI, IT

Source: Authors' elaboration based on desk and field research

First, in the centralised model (CY, MT) a single government authority manages all the tasks related to the implementation and functioning of the Card at the national level. In both countries having this governance model, the DCNO is the government authority responsible for the management of the Card. Second, in a vertical multilevel governance model (BE, RO, SI), different levels of government – including federal, national and subnational authorities – are involved according to the institutional and administrative organisation of the Member State. In BE, the Card is managed by the federal minister and the four regional institutions responsible for disability policies⁹⁹; public cooperation takes place on the basis of a protocol that specifies the policy and financial responsibilities of each authority¹⁰⁰. In RO¹⁰¹, the Card is managed by the DNCO in cooperation with the 41 DGASPCs at the local level. In SI, the Card system involves both the DCNO and the Ministry of Public Administration, which is responsible for the Administrative Units¹⁰² (i.e. administrative units); in addition, the National Council of Disabled People's Organisation of Slovenia, which is an NGO functioning as an umbrella association for 24 DPOs present in the country, contributed to the running of the Card system. Third, in a horizontal multilevel governance model (EE, FI, IT), the management of the Card involves different public authorities, including ministries and social insurance institutions as well as civil society organisations concerned with disability. In EE, even though the Card has not been issued yet, the management of the Card is expected to be based on cooperation between the DCNO and the Estonian Chamber of Disabled People (non-governmental national coalition of patient organisations at both the national and the regional level¹⁰³), the Estonian Unemployment Insurance Fund¹⁰⁴, the Estonian Ministry of Economy and Communication, the Estonian Ministry of Culture and the Equal Treatment Ombudsman Office; moreover, collaboration with local authorities and organisations of people with disabilities is expected. In FI, the Ministry of

⁹⁹ The Federal Public Service (FPS) Social Security represents the DCNO. The Agence pour une Vie de Qualité (AViQ) in the Walloon Region, the Vlaams Agentschap voor Personen met een Handicap (VAPH) in the Flemish Region, the Service public francophone Bruxellois (Service Phare) in Bruxelles-Capitale Region, and the Service for Independent Living (DSL) in the German-speaking community of Belgium are the other four authorities responsible for disability policies.

¹⁰⁰ Focus group on the cooperation model in a multi-level administrative system.

¹⁰¹ See at: <http://anpd.gov.ro/web/despre-noi/programe-si-strategii/cardul-european-pentru-dizabilitate/>
<http://dizab.eurocard.gov.ro/>.

¹⁰² See at: <https://www.gov.si/en/state-authorities/administrative-units/>.

¹⁰³ See at: <https://www.inimoigustegiid.ee/en/themes/organisations/non-governmental-organizations/estonian-chamber-of-disabled-people>.

¹⁰⁴ See at: <https://www.tootukassa.ee/eng>.

Social Affairs and Health tasked an NGO – the Service Foundation for People with an Intellectual Disability¹⁰⁵ – with the responsibility of implementing the Card system together with a Steering Group that includes the Finnish branch of the European Disability Forum (Pirkko Mahlamäki), the Ministry of Social Affairs and Health, the National Institute for Health and Welfare, and the national Social Insurance Institution. In IT, where the Card has not been issued yet, the management of the Card system was expected under the responsibility of both the DCNO and the Ministry of Labour and Social Policies; in addition, the Ministry of Cultural Artistic Heritage and Tourism, the Ministry of Transport and the Italian National Social Security Institute collaborate in ensuring the functioning of the Card.

The DCNOs have dedicated resources – both financial and human resources – for the implementation of the Card. When the pilot projects started, the DCNOs were the authorities that received and managed the EC funding. Except for EE and SI, the remaining Member States allocated national funding to ensure the financial sustainability of the Card in the long term, in line with the Call for Proposals for the Card¹⁰⁶. In EE, the DCNO did not reach any conclusion on the financial sustainability of the Card, and it is still not defined who is responsible for financing the activities related to its functioning. The DCNO submitted a request for funding from the state budget, but the funds have not been identified yet, and there is no information available on the timeline. As a consequence, the implementation of the Card remains at an impasse, since the DCNO does not have the necessary internal resources to cover key implementation tasks, including the development of the national database, the organisation of awareness-raising activities as well as the production and delivery of the Card. Specific reasons for the implementation delays have not been retrieved based on the desk analysis or through consultation of relevant stakeholders. As for SI, the EU funding ended in 2018 with the launch of the Card. No mechanisms have been established for funding the Card after the end of the EU financial support. In the other Member States, when the DCNO is a Ministry with budget autonomy (BE¹⁰⁷, CY, MT, SI¹⁰⁸), it directly manages the funding of the Card. When the DCNO is a public entity or a civil society organisation without budgetary autonomy, it receives a budget from the competent ministry (IT, RO¹⁰⁹).

FI is an exceptional case, as the DCNO allocates funding for the Card through a budget provided by the Funding Centre for Social Welfare and Health Organisations (STEA)¹¹⁰ based on allocation of funding decided by the Ministry of Social Affairs. The funds from the state lottery are distributed by STEA to the non-governmental organisations concerned with social welfare and health, including the DCNO. Overall, no issue was raised in terms of burden and costs entailed by Card implementation.

Cooperation mechanisms

Regardless of the specific model of governance, the DCNOs are responsible for most of the activities entailed by management of the Card (Table 14). In particular, the DCNOs are generally responsible for establishing the Card's website, recruiting the service providers

¹⁰⁵ See at: <https://kvps.fi/english/>.

¹⁰⁶ European Commission *Call for Proposals to support national projects on a mutually recognised European Disability Card and associated benefits*, 2015, VP/2015/012, p. 7. The Call specifies that "the requested EU contribution cannot exceed 80% of the total eligible costs of the action. The applicant must guarantee the co-financing of the remaining 20% covered from sources other than the budget of the European Union".

¹⁰⁷ In BE, the funding of the system is based on an agreement between the five issuing authorities that allocate part of their budget to finance the Card.

¹⁰⁸ In SI, the EU funding had ended no mechanisms have been established for funding the Card after exhausting EU funding.

¹⁰⁹ The DCNO is responsible for funding the Card through budget provided by the Ministry of Labour and Social Affairs. See at: <http://anpd.gov.ro/web/despre-noi/programe-si-strategii/cardul-european-pentru-dizabilitate/>; <http://dizab.eurocard.gov.ro/>.

¹¹⁰ See at: <https://www.stea.fi/web/en/stea>.

and managing contacts with them, as well as awareness-raising activities. Moreover, the DCNOs are responsible for managing the Card applications and issuing the Card.

Table 14 – Types of actors involved in the Member States

Actor \ Activity	DCNO	National authorities	Sub-national authorities	Social insurance institution	Civil society organisation	National postal service	Private entities
Establishing the Card's website	3 (BE, FI, IT)				1 (SI)		3 (CY, MT, RO)
Updating the national website	4 (BE, FI, IT, MT, RO)				1 (SI)		1 (CY)
Recruiting service providers	6 (BE, CY, FI, MT, RO)	2 (BE, CY)	1 (BE)		1 (SI)		
Managing contact with service providers	5 (CY, EE*, FI, MT, RO)		1 (BE)		1 (SI)		
Managing Card's applications	6 (BE, CY, EE*, FI, MT, RO)		3 (BE, RO, SI)				
Issuing the Card	6 (BE, CY, FI, MT, RO)		2 (BE, SI)				
Producing the Card	1 (CY)						5 (BE, FI, MT, RO, SI)
Delivering the Card	2 (CY, MT)		1 (RO)			1 (SI)	2 (BE, FI)
Managing complaints	4 (CY, FI, MT, RO)		1 (SI)	1 (FI)	1 (SI)		1 (CY)
Running the helpline ¹¹¹	5 (BE, CY, FI, MT, SI)						
Raising awareness	7 (BE, CY, FI, IT, MT, RO, SI)	2 (BE, CY)	2 (BE, CY)	2 (FI, SI)	1 (BE)		
Establishing databases ¹¹²	5 (BE, CY, EE, RO, SI)		1 (RO)	1 (IT)			

Source: Author's elaboration based on desk and field research

Despite the fact that most of the activities entailed by the management of the Card are concentrated in the hands of the DCNOs, in most Member States cooperation mechanisms were established between the DCNOs and public authorities in the field of disabilities and social insurance institutions. In BE, the DCNO decided to establish a Steering Committee specifically concerned with the Card's management involving the four public authorities responsible for regional disability policies. The DCNO is also the contact point for the Steering Committee at the European level, collaborating and communicating with the Commission and the other Member States¹¹³. In RO, the Card provided an opportunity to strengthen cooperation between national public institutions to attract service providers¹¹⁴. SI is the only Member State where the collaboration between the authorities involved in the management of the Card showed some limitations. In particular, in 2017 there was an agreement between the DCNO and the National Association of Disabled People (NSIOS) establishing that NSIOS would be responsible for managing contacts with service providers

¹¹¹ In RO, a helpline was not established.

¹¹² In FI, the databases of eligible persons and beneficiaries do not exist due to legislative restrictions regarding privacy issues.

¹¹³ Focus group on the cooperation model in a multi-level administrative system.

¹¹⁴ Survey question 72.

and for updating information on the national Card's website. However, the agreement did not specify the means of payment and, due to limited financial resources, the NSIOS has never undertaken the task.

The Belgian cooperation mechanism

In BE, the DCNO was able to successfully implement the Card within a multi-level administrative system. The set-up of the national Card's system entailed:

- Establishing a Steering Committee that involves different public authorities, a private entity and representatives of civil society such as the Conseil Supérieur National des Personnes Handicapées (CSNPH) and the Belgian Disability Forum (BDF);
- Creating a unique infrastructure for the exchange of data between the public authorities in charge of the Card's management and the private entity responsible for its production and delivery.

The collaboration model was successful thanks to long-standing and very structured cooperation between the members of the Steering Committee who were used to working together even prior to the Card's introduction. Notably, there was strong collaboration between federal and regional agencies and partners on accessibility for the launch of the Card. This pre-existing cooperation practice allowed for the establishment of the Steering Committee in a very short time span and allowed it to respond to the Card's Call for Tender accordingly. Once the pilot started, the Steering Committee adopted a very collaborative approach, with monthly meetings organised to jointly define the implementation strategy of the Card system. Structured collaboration, together with a high level of trust between the different members who knew each other for a long time, allowed for finding common solutions for Card's the proper management, including its funding and financial sustainability. For instance, bodies in the field of leisure and culture, such as the Flemish Agency for Persons with Disabilities (VAPH) and UITPAS¹¹⁵, organised meetings with the support of the entity Public¹¹⁶ with the aim of finding solutions for integrating the Card System with regional services. In addition, previous experience with the EU Parking Card allowed the Steering Committee to quickly and properly identify the main implementation needs and to define tailored solutions, including the involvement of the private entity in the Card's scheme.

Source: Focus group on the cooperation model in a multi-level administrative system

Besides cooperation between public authorities, most Member States established **public-private cooperation mechanisms**. The private sector, including private entities and private service providers, have been involved in the Card's scheme through different activities. Notably, private entities, in some cases, took up the establishment and management of the national Card's websites (par. 5) and national databases with information about eligible persons, beneficiaries and service providers (par. 0) as well as the production and/or delivery of the Card (par. 0). Private service providers, in some Member States, were in charge of the provision of benefits to persons with disabilities (par. 0). As for the Card's production, it is interesting to report the case of BE, where the DCNO followed what was already done for the EU Parking Card¹¹⁷. Since the DCNO did not have the means for producing the Card, it decided to outsource the production and delivery of the Card to a private entity¹¹⁸.

The DCNOs provided positive feedback regarding the cooperation between the actors involved in the Card's management, particularly in terms of information sharing (BE, CY, FI, IT, RO), financial collaboration (BE, CY, FI) and observance of deadlines (BE, CY, FI, RO)¹¹⁹. SI is the only Member State where the DCNO declared that there was no collaboration with other relevant actors.

¹¹⁵ See at: <https://www.uitpas.be/wat-is-uitpas>.

¹¹⁶ See at: <https://www.publiq.be/en/>.

¹¹⁷ https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/belgium/index_en.htm

¹¹⁸ Focus group on the cooperation model in a multi-level administrative system.

¹¹⁹ Survey question 70: 6 DCNOs (BE, CY, FI, IT, RO) and 18 PAs (1BE, 1FI, 16RO). The DCNO of EE did not provide an answer.

Examples of cooperation

Beside the BE case, other Member States established cooperation mechanisms to run the Card:

In CY, there was a high level of collaboration between the DCNO and other authorities for the organisation of meetings and sharing of information for the development of the project. In particular, the DCNO collaborated with public authorities such as the Ministry of Transport, the Department of Antiquities, the Cultural Services of the Ministry of Education, Culture, Sports & Youth, as well as the Cyprus Sports Organisation.

In EE, cooperation towards the establishment of the Card system involved the Estonian Social Insurance Board, the Estonian Chamber of Disabled People and the Ministry of Social Affairs.

In FI, a Steering Group¹²⁰ was established in order to make relevant decisions related to the establishment and functioning of the Card system. Moreover, the main public train company collaborated since the beginning of the project and actively contributed to raising the interest of other transport sector actors to join the Card project.

In RO, the DCNO established formal collaboration with the Ministry of Culture, the Ministry of Sports and Tourism, the Romanian Football Federation and the Romanian Handball Federation. Furthermore, the DCNO initiated partnerships with the 42 National County Councils to identify local cultural heritage and touristic sites to be included in the list of benefits for the Card beneficiaries. Moreover, the DCNO is in ongoing contact with the local DGASPCs that are responsible for reviewing the applications from persons with disabilities.

Source: Online survey¹²¹, interviews with the DCNOs, and focus groups

To conclude, it is interesting to note that in MT, where the DCNO is the only authority responsible for the Card's management, hence, where no national cooperation is involved, the Card offered an opportunity to build cooperation with authorities involved in the Card project outside the country¹²². The DCNO delivered several presentations about the Maltese experience with the Card, including one in June 2019 at the Conference of State Parties for the UNCPRD. No other information was provided about transnational cooperation and there is no evidence of data sharing and exchanges between actors concerned with the Card's management across Member States. This point was further confirmed by consultation with the DCNOs that stressed the limited cooperation and the **need to further invest in systematic exchanges of information and national good practices**¹²³.

Consultation with stakeholders not directly involved in the management of the Card

In all the Member States, **consultation with stakeholders** not directly involved in the management of the Card was carried out during the process of designing the Card systems at the national level. Notably, persons with disabilities and civil society organisations concerned with disability were directly involved by the DCNOs at the beginning of the project¹²⁴. Some Member States consulted directly with persons with disabilities¹²⁵ in order to identify their key needs and define the packages of services and benefits to be covered (CY, FI, MT, SI)¹²⁶. Persons with disabilities were also involved by the DCNOs throughout

¹²⁰ Pirkko Mahlamäki, STM, THL, KELA.

¹²¹ Survey question 71 and 72: 4 DCNOs (BE, CY, FI, RO), and 10 PAs (1BE, 9RO).

¹²² Interview with the DCNO.

¹²³ Focus group on the recruitment and management of service providers.

¹²⁴ Survey question 74: 4 DCNOs (CY, FI, MT, SI), 6 PAs (3 CY, 1 FI, 2 SI), 1 CSO (1 CY) and 15 DPs.

¹²⁵ Survey question 73.

¹²⁶ Survey question 73: 6 DCNOs (BE, CY, FI, IT, MT, RO), 10 PAs (2 BE, 8 RO); 19 CSOs (2 BE, 5 CY, 2 EE, 6 FI, 2 IT, 1 MT, 1 RO) and 21 DPs. As regards EE, the DCNO did not respond to this question. Two CSOs declared that no consultations with persons with disabilities had been carried out, while one CSO reported the contrary. In RO, the DCNO, eight PAs and one CSO reported that consultations with persons with disabilities were not carried out, while seven PAs reported the opposite. The interview with the DCNO confirms that such consultations were not carried out, rather they were conducted only with

the pilot project to collect their feedback on the Card (CY, FI, MT) and to actively promote their participation in the Card awareness-raising activities (SI). Moreover, in BE and FI, the civil society organisations were directly involved from the beginning of the pilot project to collect information on the needs of persons with disabilities and to define the package of benefits of the Card. Experts in the field of disability were involved only in BE, EE and FI.

Examples of consultations

- In BE, consultations were organised with the civil society organisations (e.g. the National High Council for Persons with a disability) to explain the role of the Card. Public authorities were responsible for organising the consultations, which were mainly carried out through focus groups. Moreover, the Steering Committee together with civil society organisations collaborated to establish partnerships with relevant service providers and to sensitise them to the needs of persons with disabilities. The Steering Committee developed a brochure with information about the types of benefits that could be offered to persons with disabilities, including accessibility services. The brochure was shared with relevant civil society organisations. Moreover, civil society organisations indicated some of the service providers that the Steering Committee could start contacting.
- In CY, consultations took place between the DCNO and the Cyprus Confederation of Disability Organisations as well as the Paraplegic Organisation (not part of the Confederation) together with the potential service providers. The DCNO first invited the service providers to build the benefits' package and then the representatives of the national organisations concerned with disability to several consultation meetings. The consultation process encountered significant friction between the DCNO and the Cyprus Confederation of Disability Organisations. The package of benefits, for instance, did not meet the Confederation's satisfaction and after intensive intervention by the latter, the DCNO drafted a new catalogue of benefits without further consultation. The Confederation never gave their written consent to the Card's scheme.
- In EE, disability organisations were involved in consultations as representatives of persons with disabilities and to suggest the key services and benefits to be covered with the Card. Consultations with these organisations were also aimed at mapping and gathering information on the experience of the target groups when travelling across the EU, focusing on the type of benefits ensured abroad and the problems encountered.
- In FI, consultations with persons with disabilities were undertaken through local events across the country and through the Card's national website, videos and leaflets as well as materials in sign language. NGOs, persons with disabilities and service providers had the opportunity to evaluate the project after every event by using the feedback questionnaires. Persons with disabilities were contacted primarily through social media (e.g. Facebook).
- In MT, persons with disabilities were invited by the DCNO to provide feedback for defining the package of benefits both through a public consultation process and through their NGOs/DPOs. Notably, the conference for the project launch was attended by a considerable number of participants. During the conference, participants were encouraged to contact the DCNO to provide suggestions for the project throughout its implementation.
- In RO, civil society organisations were involved in dissemination activities organised by the DCNO in 2016, prior to the launching of the Card. Agreements were made with the National Association of Deaf People of Romania, the National Association of Blind People and Step-by-Step Association centre for education and professional development to disseminate the information regarding the benefits among their members.
- In SI, the umbrella organisation representing civil society organisations was responsible for consultations with persons with disabilities through meetings and focus groups in order to identify the national package of benefits.

Source: Online survey¹²⁷, interviews with the DCNOs and focus groups

The **consultation tools** most frequently used include public events (BE, CY, FI, IT, RO), focus groups (CY, FI, MT, SI), meetings (CY, EE, FI, MT, SI), online surveys (CY, FI, IT, MT, RO, SI) and phone interviews (FI, RO, SI). In addition, social media (e.g. Facebook) were used to gather feedbacks on the Card through surveys in FI, and open public consultations were organised in CY and MT¹²⁸.

CSOs. For this reason, it was considered that the seven PAs refer to the consultation with CSOs as representing persons with disabilities.

¹²⁷ Survey question 73: 6 DCNO (BE, CY, FI, IT, MT, RO), 10PAs (2BE, 8RO), 19 CSOs (2 BE, 5CY, 2EE, 6FI, 2IT, 1MT, 1 RO), 21 DPs.

¹²⁸ Survey question 110.

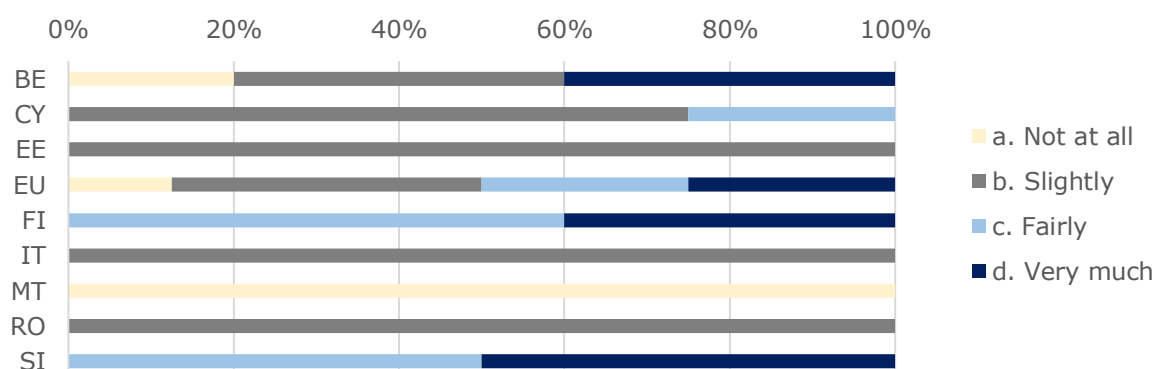
Information on the number of persons with disabilities reached through the different consultation tools is very limited. In CY, a CSO responded that the consultation processes were carried out by the DCNO to map the situation related to disability and respective benefits provided in other MS which do not participate in the Card's scheme so as to understand if national persons with disabilities would need the Card. To this aim, 128 people were surveyed in CY. In MT, the DCNO organised a conference for the launch of the project in March 2016. The conference was attended by more than 60 persons with disabilities, most of which were Maltese citizens, but also some foreigners with disabilities residing in MT. The Chairman was involved, and the conference was given media coverage on local TV stations and an article in the local newspaper.

Overall, civil society organisations agreed that their opinions played a substantial role in the design and implementation of the Card at the national level (Figure 1). The only exception was in CY, where disagreements emerged between the DCNO and the Confederation of Organisations of persons with disabilities (CCOD), an umbrella organisation including nine Disabled Persons Organisations throughout the country. In 2013, the CCOD claimed that they should have been consulted prior to the decision to issue the Card and not only after the DCNO had submitted the proposal to co-finance the Card project. Furthermore, the CCOD disagreed on¹²⁹:

- The new disability assessment that is based on the ICF system (International Classification of Functioning, Disability and Health) instead of the use of a less medical and broader definition of disability, such as the social model of disability as included in the UN CRPD;
- The initial plan to limit the Card solely for persons with severe disabilities;
- The paucity of benefits provided;
- The involvement of the CCOD as one among many stakeholders, whereas according to the national law, the CCOD is the Social partner of the DSID in disability matters and this role should have been recognised.

Their complaints were partially addressed by increasing the list of benefits and by extending the eligibility to persons with moderate and severe disabilities¹³⁰.

Figure 1 - Opinion of civil society organisations on their involvement



Source: Author's elaboration based on online survey¹³¹

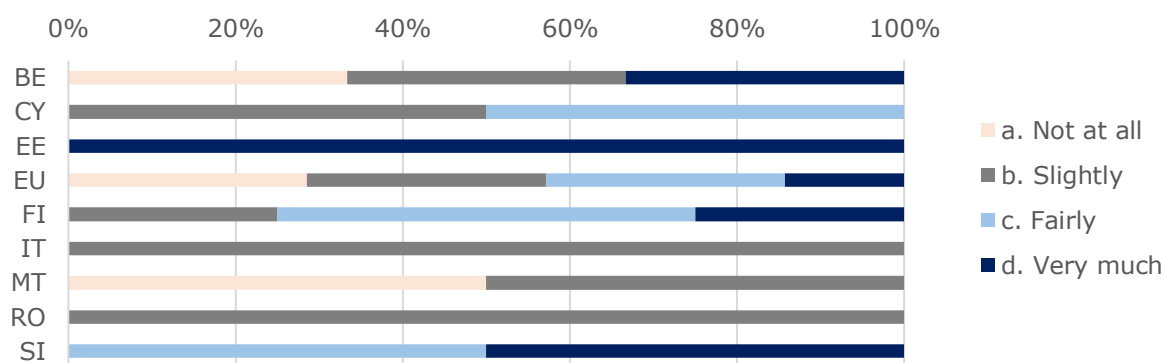
¹²⁹ Focus group on CY.

¹³⁰ Focus group on CY.

¹³¹ Survey question 82: 30 CSOs (5 BE, 4 CY, 2 EE, 8 EU, 5 FI, 1 IT, 2 MT, 1 RO, 2 SI).

To conclude, it is interesting to note that, even though the civil society organisations were generally satisfied with their involvement, they agreed that **the opinion of persons with disabilities was paid little attention in the development of the Card systems** (Figure 2).

Figure 2 - Opinion of civil society on involvement of persons with disabilities



Source: Author's elaboration based on online survey¹³²

Awareness-raising campaigns

Awareness-raising activities were organised in **all pilot Member States**. Overall, promotional activities were meant to disseminate information on the project to persons with disabilities (all Member States) as well as service providers (BE, MT, SI) and civil society organisations (IT, RO, SI). In SI, the promotion campaigns were also targeted to the Public Authorities responsible for data protection. In BE, awareness-raising activities were addressed to foreign beneficiaries. In EE, where the Card is yet to be implemented, these activities were aimed at introducing the Card at the national level, thus their scope was more limited than the activities carried out in Card-issuing countries. Similarly, in IT¹³³, awareness-raising activities consisted of internal communications to inform the DCNO associates on the Card's implementation plan. Except in IT, most DCNOs reported to be satisfied with the capacity of the awareness-raising activities to reach their targets (BE, CY, FI, MT, RO, SI)¹³⁴. **With respect to the timeline of the awareness-raising campaigns in the different countries, they started in 2016 and 2017 and lasted one year. CY and RO are the only two Member States where the awareness-raising campaigns are still ongoing.**

Table 15 – Timeline of awareness-raising activities

MS	Time period
BE	From October 2017 to December 2017
CY	From March 2017 ongoing
EE	From the end of 2016 until the beginning of 2017
FI	Throughout the pilot period, and especially during 2018 and 2019

¹³² Survey question 78: 27 CSOs (3 BE, 6 CY, 1 EE, 7 EU, 4 FI, 1 IT, 2 MT, 1 RO, 1 SI).

¹³³ During the interview, the DCNO clarified that communication activities were carried out through internal channels, including press releases, the DCNO website and internal events. As a result, the DCNO asserted that FISH associates are well-aware about the Card project. These activities targeted DCNO associates to increase their awareness of the Card.

¹³⁴ Survey question 108. The DCNO of EE did not provide any information.

MS	Time period
IT ¹³⁵	-
MT	From March 2016 until January 2018
RO	From 2016/2017 – ongoing
SI ¹³⁶	From December 2016 to July 2017

Source: Author's elaboration based on consultation with the DCNOs

The most commonly used **communication tools** were i) Card national websites (all Member States), ii) coupled with leaflets and posters (BE, CY, FI, MT and RO), iii) brochures in multiple languages (BE, CY, FI, RO, SI)¹³⁷, iv) TV and advertisements (BE, CY, MT, RO, SI, EE), v) social networks (BE, CY¹³⁸, EE¹³⁹, FI, IT, MT, RO, SI). Additionally, MT used bus advertising and car wrapping, and in SI a mobile App was developed. No podcasts were used for the awareness-raising activities, neither were CDs and DVDs nor E-books. Furthermore, events, to which public authorities, civil society organisations, service providers and the press were invited, were organised in some Member States (BE, EE, MT, RO). The events were meant to present the project and collect feedback from the involved stakeholders. Public debates and roundtables (FI, SI) as well as training sessions (RO) were also organised¹⁴⁰. Information about the accessibility of awareness activities was provided only for FI¹⁴¹.

Table 16 - Tools used for awareness-raising activities

MS	Mobile apps	Social network	TV/audio spot/ advertisement	Website/ blog	Newsletter	CD/DVD	E-book	Film/video	Newspaper/ magazine	Podcast
BE	×	✓	✓	✓	✓	×	×	×	✓	×
CY	×	×	✓	✓	×	×	×	✓	✓	×
FI	×	✓	×	✓	✓	×	×	×	×	×
MT	×	✓	✓	✓	×	×	×	✓	×	×
RO	×	✓	✓	✓	✓	×	×	×	✓	×
SI	✓	✓	✓	✓	✓	×	×	×	✓	×

¹³⁵ The DCNO from IT did not provide any information.

¹³⁶ The DCNO did not provide any information. However, this information was available in the Technical Implementation Report for SI and was, therefore, integrated here.

¹³⁷ Survey question 106.

¹³⁸ According to a CSO and one SP.

¹³⁹ According to a CSO and one SP.

¹⁴⁰ No information is available on the number of target audience reached and accessibility of the awareness-raising activities.

¹⁴¹ Final Technical Implementation Report: no information was available regarding the breadth of target audience reached. As for accessibility of the events, the DCNO reported that they selected accessible environments providing extra assistance for people with disabilities, ensuring audio induction loop and sign language translation.

Source: Author's elaboration based on online survey¹⁴² and consultation with the DCNOs

Service providers reported having actively contributed towards the communication and advertisement of the Card only in BE and MT.

6.1.2. Functioning of the Card

Key findings

Finding 5 – The Card is addressed to subjects recognised as persons with disabilities according to national legislation and residing in the issuing Member States. Except in CY and SI, the introduction of the Card did not entail any new legislation. CY adopted the «Scheme for the EU Disability Card in CY», a Council of Ministers' decision laying down specific eligibility criteria for the Card. In SI, the Equalisation of Opportunities for Persons with Disabilities Act was amended in 2017, including an article specifically referring to the introduction of the Card (EQ 1).

Finding 6 - Except in CY, EE and RO, the eligibility criteria to receive the Card are the same used to receive national benefits. Subjects recognised as persons with disabilities according to national legislations may automatically receive the Card (EQ 4).

Finding 7 - All Member States established national databases with data on eligible persons, beneficiaries and service providers, in compliance with GDPR requirements, in order to collect all relevant information to implement the Card system (e.g. personal data of eligible persons, participating service providers, etc.) (EQ 4).

Finding 8 - The Card was issued in all Member States, except for EE and IT. In most cases, the production is outsourced to a private entity. In most cases, the same private entities responsible for production of the Card were also involved in its delivery (EQ 5).

Finding 9 – The application process is managed by the DCNOs and sub-national authorities. The DCNOs are the bodies responsible for the issuing of the Card once they approve the application (EQ 5).

Finding 10 – In all Member States, security mechanisms were established for Card fraud avoidance and beneficiary data protection (EQ 5).

Finding 11 – The Card covers both the culture and the leisure sectors in all Member States. The coverage of the transport sector is more heterogenous across Member States and depends on the nature of the type of transport, i.e. public or private (EQ 6).

6.1.3. Legal framework and eligibility criteria

In all of the Member States participating in the initiative, the Card is addressed to subjects recognised as persons with disabilities according to national legislations and residing in the issuing Member State or in other countries participating in the pilot project. The legal framework of reference for the Card's schemes was defined at the national level in the eight Member States. The establishment of the Card systems was covered by national legislation regulating disability policies (see Table 1) and establishing the definition of disability (Table 2). In most Member States, no new legislation was passed, with the exception of CY and SI. CY adopted the «Scheme for the EU Disability Card in CY», a Council of Ministers' decision laying down specific eligibility criteria for the Card¹⁴³. In SI, the legislative framework of reference for national disabilities policies – the Equalisation of Opportunities for Persons with Disabilities Act¹⁴⁴ – was amended in 2017, including an article specifically referring to the introduction of the Card¹⁴⁵.

¹⁴² Survey question 75 and 81.

¹⁴³ See at: <http://www.eudisabilitycard.gov.cy/en/page/europaiki-karta-anapirias>.

¹⁴⁴ Official Gazette Nr. 94/10, 50/14 in 32/17.

¹⁴⁵ See at: <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO4342>. Article 4 (application of the law governing general administrative procedure): (1) The provisions of the law governing the general administrative procedure shall apply (...) procedures for claiming an EU disability benefit card. They are not regulated otherwise in this Act. (2) Documents and actions in proceedings for the exercise of rights under this Act shall be free of charge.

The **eligibility criteria** for the Card are identified based on the definition of disability included in national legislations (Table 3).

Thus, persons already entitled to disability status under national laws are directly recognised to be eligible for the Card. Therefore, new assessments are performed only for persons not yet recognised as disabled. The eligibility assessment of persons not yet recognised as disabled is the same as those performed to grant disability status at the national level. In the Member States where the provision of benefits is not voluntarily chosen by the service providers (RO) or where there was a national disability Card (CY, MT), the criteria to receive the Card are broader than under the previous situation. In CY, the Card is currently granted only to persons with moderate and severe disabilities who are also those benefitting from national provisions; however, the objective is to expand the criteria to include persons with mild disabilities. In RO, the Card entails benefits to persons having any degree of disability, whereas only persons with a profound, severe or moderate degree of disability can benefit from national provisions.

National databases

Most Member States have established **national databases** for the collection of data on eligible persons, beneficiaries and service providers. As for the latter, the contact information of participating service providers was stored, paired with the related services offered for CY, MT, RO, and SI¹⁴⁶. As for BE and FI, the national Card's websites include only links to the participating service providers and related addresses, without any further information. All national databases were established in accordance with GDPR requirements¹⁴⁷.

Table 17 - National databases

MS	Eligible persons	Beneficiaries	Service providers
BE	✓ ¹⁴⁸	✓	✓
CY	✓	✓	✓
EE	✓	×	×
FI	×	×	✓
IT	✓ ¹⁴⁹	×	×
MT ¹⁵⁰	×	✓	×
RO	✓ ¹⁵¹	✓	×

¹⁴⁶ No information was available about the database of eligible persons and beneficiaries, since no access was granted to the Contractor. However, it is likely that information includes home address, telephone number, email address, and birthdate. If the DCNO was the social insurance institution, such as in FI, more information on the social benefits they receive, or the severity/percentage of disability might have been available.

¹⁴⁷ Interviews with the DCNOs.

¹⁴⁸ Interviews with the DCNO.

¹⁴⁹ Interview with the DCNO. In IT, a database of persons with disabilities already exists, and it is managed by the National Institute for Social Security (INPS), which is responsible for uploading, updating of information and maintaining it.

¹⁵⁰ An update with the DCNO on the databases established in MT confirmed that there is only one database in MT where the data of the applicants are retained. Persons with disabilities can submit the application to the Card on the EU Disability Card's website, which is linked to the database recorded the information.

¹⁵¹ Interview with the DCNO.

MS	Eligible persons	Beneficiaries	Service providers
SI ¹⁵²	✓	✓	✓

Source: Author's elaboration based on consultation with the DCNOs

In some Member States, the databases were managed in-house by the DCNO or by other public authorities, both national and subnational, as well as by social insurance institutions. In other Member States, private entities are involved. Moreover, some Member States already had a database containing information on persons with disabilities that was used to collect information on persons eligible to receive the Card. Table 18 provides an overview of the national databases in the different Member States.

Table 18 - Establishment and running of national databases

	BE	CY	EE	FI ¹⁵³	IT	MT	RO	SI
Eligible persons	Already existing - DCNO	In house - DCNO	In house - DCNO		Already existing ¹⁵⁴		Already existing - DCNO	In house - DCNO
Beneficiaries	Already existing ¹⁵⁵	In house - DCNO				In house/outsourced ¹⁵⁶	In house/outsourced ¹⁵⁷	In house - DCNO
Service providers	In house - DCNO	In house - DCNO		In house - DCNO				In house ¹⁵⁸

Source: Author's elaboration based on online survey¹⁵⁹ and consultation with the DCNOs

With respect to **eligible persons**, the DCNOs either established *ex novo* databases (CY, EE, SI) or referred to the data already contained in existing national databases (BE, IT, RO). In the case of the *ex novo* databases, the DCNOs were responsible for their establishment and maintenance as well as for the uploading and updating of the information within.

Databases of **beneficiaries** were established in five Member States (BE, CY, MT, RO, SI). In CY and SI, they were managed in-house by the DCNO; in MT and RO, the DCNOs cooperated with a private entity. In particular, the establishment and maintenance of the

¹⁵² Interview with the DCNO.

¹⁵³ In FI, the databases of eligible persons and beneficiaries do not exist due to legislative restrictions regarding privacy issues.

¹⁵⁴ The database is managed by the Italian Institute for Social Insurance.

¹⁵⁵ The database is managed by the Crossroads Bank for Social Security.

¹⁵⁶ The establishment and maintenance of the database are outsourced to a private entity whereas the information upload and update are managed in house by the DCNO.

¹⁵⁷ The establishment of the database and the information update are managed in house by the DCNO, whereas information upload and maintenance are outsourced to a private entity.

¹⁵⁸ The database is managed by National Council of Disabled Peoples' organisation of Slovenia that cooperates with the DCNO for the running and management of the Card at the national level.

¹⁵⁹ Survey questions 24, 30, 46.

database in MT is outsourced, while in RO such activities are performed by the DCNO whereas the updating and uploading of information in the database are outsourced. In BE, the database is managed by a public institution in the field of social insurance, the Crossroads Bank for Social Security¹⁶⁰ (CBSS). The CBSS has an existing platform where the data on Cardholders collected by different public authorities at federal and regional levels are merged in a unique database. The information on beneficiaries is then available to the private entity responsible for production of the Card, in compliance with the GDPR requirements¹⁶¹. In MT, the establishment and maintenance of the database were subcontracted to a private entity, while the updating and uploading of information are performed in-house by the DCNO. In RO, the local DGASPCs are in charge of the local databases with information on persons with disabilities requesting the Card. The DCNO also has access to the national registry of persons with disabilities that was already in place prior to the establishment of the Card system.

The databases containing information about **service providers** were established in all Member States, except MT and RO. Databases of service providers were established in-house by DCNOs in BE, CY and FI. In SI, the database was established by an external NGO.

Production, application and security mechanisms

In five Member States, the production of the Card is outsourced to private entities through formal agreements (BE, FI, MT, RO, SI). In BE, the production of the Card was outsourced to a private company through a public procurement procedure. In FI, the DCNO requested offers for this procurement from three providers, from which the current one was selected. Prior to that, the DCNO conducted a review of possible service providers for the Ministry in order to comply with the Procurement Act. In RO, the contract with the private entity lasted only five months and it was not renewed by the DCNO. In particular, during the Card project, the DCNO reallocated parts of the cost savings to the procurement of a UV printer¹⁶² for the personalisation of the Cards without having to subcontract the process. The aim of the DCNO was to ensure that the Cards would continue to be produced also after the end of the pilot project. In SI, the DCNO involved a private company in the printing of 170,000 Cards, corresponding to the official number of eligible persons with disabilities in SI. The production of the Card was outsourced between 2015 and 2017. Nonetheless, the company still personalises the printed Cards without charging the DCNO. Once the application for the Card is approved by the relevant Administrative Unit, it is sent to the private company that prints the Card with the name of the new Cardholder and sends it free of charge. Normally, the Administrative Units collect a certain number of applications prior to sending the request for printing to the private company. In EE, there is no final decision (see par. 0) about the Card production procedures yet, however the Card producer will be selected through a public procurement.

Production of the Card is either demand-based (BE, FI, MT) or pre-printed (CY, RO, SI). In case of pre-printing, the number of Cards produced is greater than the number of those issued (Table 19). In CY, RO and SI, the number of Cards produced by the DCNOs corresponds to the number of Cards expected to be produced and reported in the EU Disability Project proposals. MT is the only country where the numbers of Cards produced and issued are higher than the initial estimates, however such differences are related to the fact that the Card will be gradually replacing the National Disability Card. Similarly, in case

¹⁶⁰ See at: <https://www.ksz-bcss.fgov.be/en>.

¹⁶¹ GDPR is respected both by CBSS (<https://www.ksz-bcss.fgov.be/fr/protection-des-donnees/en-pratique/reglement-general-relatif-a-la-protection-des-donnees>) and by MultiPost (<https://www.multipost.com/data-security/>).

¹⁶² UV printing is a digital printing method using ultra-violet light to dry or cure ink as it is printed.

of the Card's extension to other Member States, it is expected that, where a National Card already exists, the take-up of the programme will be faster.

Table 19 - Number of Cards produced and issued

MS	N. of Cards produced	N. of Cards issued	N. of Cards estimated ¹⁶³
BE	74,565 ¹⁶⁴	74,565	85,000 ¹⁶⁵
CY	5,000	2,110 ¹⁶⁶	5000
EE	0	0	0
FI	5,157	5,157	_ ¹⁶⁷
IT	0	0	0
MT	11,009 ¹⁶⁸	11,009 ¹⁶⁹	7000
RO	50,000	14,649 ¹⁷⁰	50,000
SI	170,000	7,589 ¹⁷¹	170,000

Source: Author's elaboration based on desk research and consultation with the DCNOs

Unit production costs vary significantly across Member States, as in Table 20, ranging from €5 per Card in FI to €0,14 per Card in BE.

Table 20 - Production costs¹⁷²

MS	Unit cost (€)	Overall cost (€) ¹⁷³	EU funding (€)	National funding (€)
BE ¹⁷⁴	0.14	-	-	-
CY	2.085	10,425.00	8,340.00	2,085.00

¹⁶³ The number corresponds to the information reported in the EU Disability Project proposals.

¹⁶⁴ The number reported was updated to 30/02/2020 by the DCNO.

¹⁶⁵ The DCNO reported that the estimation of the number of Cards was based on the number of Disabled Parking cards issued by the FPS Social Security, which amounted to 85,000 applications reviewed.

¹⁶⁶ The number reported by the DCNO through the online survey is 953. However, following consultation with the national expert, it became clear that the 953 only take into account Cards issued in 2019, while 2,110 is the number updated to 12/12/2019.

¹⁶⁷ The DCNO did not provide the number reported in the Project proposal. The goal was to have enough Cards to cover the costs to maintain the service and to secure funding for development of the Card system.

¹⁶⁸ No information was provided by the DCNO on the number of Cards produced, but only on the number of Cards issued. For this reason, it is assumed that the number of the Cards produced corresponds to the number of Cards issued.

¹⁶⁹ The number reported by the DCNO through the online survey is 3,997. However, later the DCNO provided the updated number as of 3/06/2020.

¹⁷⁰ The number reported by the DCNO during initial consultations was 14,111. However, later the information was updated as of 13/3/2020.

¹⁷¹ Interview with the National Council of Disabled People's Organisations.

¹⁷² Survey questions 148. The DCNOs provided this information. The DCNOs of FI and SI did not reply to this question; however, the DCNO from FI provided data later on by email. Only for CY, unit production costs were also reported in the Final Financial Statement, allowing for data triangulation.

¹⁷³ The overall production cost is the calculated as the sum of EU and national funding.

¹⁷⁴ The DCNO reported that since the Card is implemented in six different regions, the DCNO does not have a complete overview of the cost.

MS	Unit cost (€)	Overall cost (€) ¹⁷³	EU funding (€)	National funding (€)
FI ¹⁷⁵	5	-	-	-
MT ¹⁷⁶	2.35	8,235.20	6,586.15	1,649.05
RO ¹⁷⁷	0.548	27,409.17	21,919.11	5,490.06
SI ¹⁷⁸	0.93	157,258	125,806.40	31,451.60

Source: Author's elaboration based on desk research and consultation with the DCNOs

In most Member States, the entity responsible for the production of the Card is also in charge of its **delivery**¹⁷⁹ (BE, CY, RO, SI). In FI, the delivery is outsourced to the national postal service that is a private entity. In MT, the DCNO is responsible for the delivery of the Card. In RO, the Card is picked up by the applicants at the offices of the DGASPC.

With the exception of FI, the delivery of the Card is free of charge (BE, CY, MT, RO, SI)¹⁸⁰. Beneficiaries in FI are asked to pay a fee of €10 to cover both production and delivery costs. In EE, the delivery is expected to be fee-based in order to cover production costs and to discourage those who are not really interested in the Card from applying for it¹⁸¹, whereas, in IT, the delivery is expected to be free of charge. The cost of delivering the Card range between €0.5 and €2 per Card as shown in Table 21.

Table 21 - Cost of delivery¹⁸²

MS	Cost of delivery (€)
BE	1.03
CY	2.00
FI	1.83
MT	0.50
RO	0
SI ¹⁸⁴	-

¹⁷⁵ The DCNO did not provide the information.

¹⁷⁶ The data refer to a total of 3500 Cards issued as of April 2018 as reported in the project final report. The unit cost was calculated as weighted average of costs of €2.17 per 1500, €2.48 per 2000 and €4.04 per 5 units with braille. The DCNO reported the rate of the project was 80% EU funds and 20% national funds. Detailed information is available in the Country Fiche of MT.

¹⁷⁷ The DCNO updated the data on unit cost firstly provided in the survey.

¹⁷⁸ The DCNO did not provide the information.

¹⁷⁹ Survey question 93.

¹⁸⁰ Survey question 94.

¹⁸¹ Interview with the DCNO.

¹⁸² Survey question 149 and consultation with the DCNOs.

¹⁸³ Production costs include also delivery costs.

¹⁸⁴ The DCNO did not provide information on the costs of delivery.

Source: Author's elaboration based on online survey¹⁸⁵ and consultation with the DCNOs

The **application process** is mainly online, however there are Member States where the application can be submitted via mail or directly in person as Table 22 shows.

Table 22 - Application process

MS	Dedicated website	Via mail	In person
BE	✓	✓	✓
CY	×	✓	×
FI	✓	✓	×
MT	✓	✓	✓
RO	✓	×	✓ ¹⁸⁶
SI ¹⁸⁷	✓	×	✓

Source: Author's elaboration based on online survey¹⁸⁸ and consultation with the DCNOs

The DCNO directly manages **the applications** (CY, FI, MT) or collaborates with other institutions (BE, RO, SI)¹⁸⁹. In BE, all five issuing authorities are in charge of managing the applications they receive, since they already store the information on eligible persons in their databases; applications are double-checked by the CBSS. In RO, the DCNO collaborates with the DGASPCs, and in SI it cooperates with the Ministry of Public Administration. In four Member States (CY, MT, RO, SI), the applicant is required to submit the disability status confirmation to the authorities responsible for the application. In some Member States, the instructions for applying for the Card are provided on the national websites for the Card (CY, FI, MT, RO). A helpline was established in-house by the DCNO in most of the Member States (BE, CY, FI, MT, SI) to facilitate the application process as well as provide information on the use of the Card (CY, BE, FI, MT, SI). Most Cardholders (68%) are not aware of the existence of a helpline associated with the Card, 21% of respondents know there is one, and 10.1% report there is none.

The application process is generally perceived as being user-friendly both by the DCNO and the other public authorities as well as by the civil society organisations (Figure 3). From the perspective of persons with disabilities, the application process is mainly (44.3%) regarded as fairly user-friendly, and 40.5% consider it very user-friendly. Another 12.2% among persons with disabilities consider it slightly user-friendly and 3% not at all.

¹⁸⁵ Survey question 149.

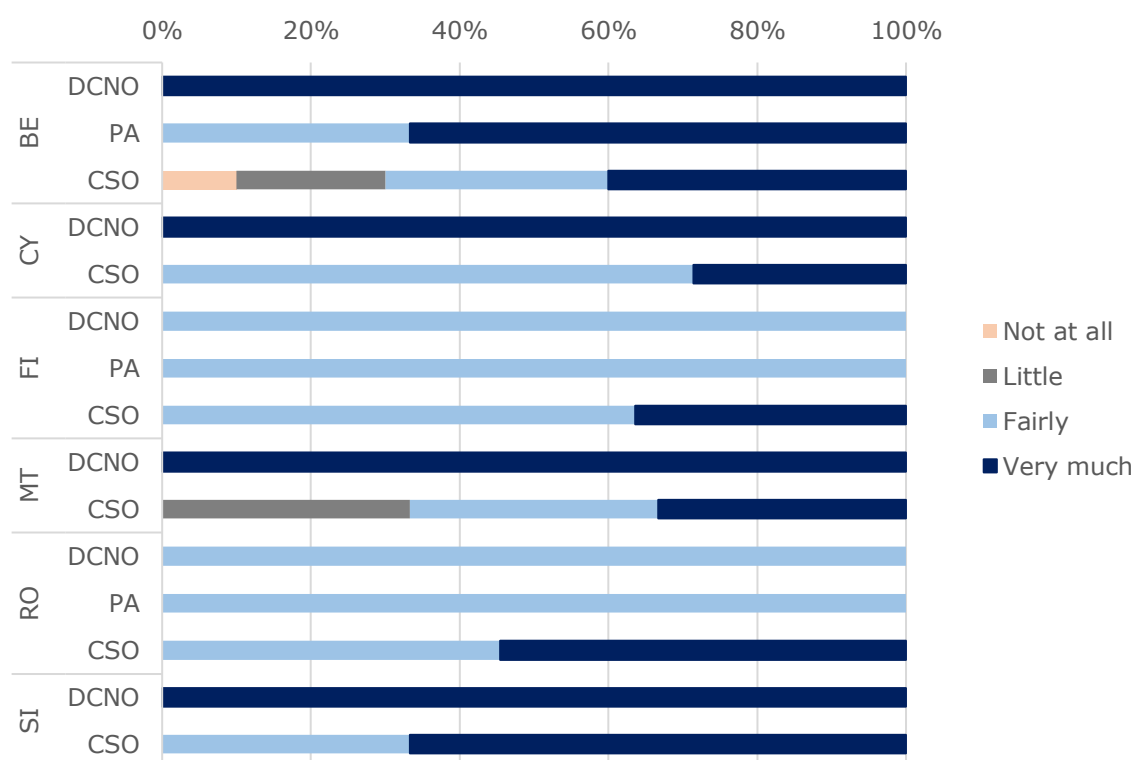
¹⁸⁶ See at: <http://dizab.eurocard.gov.ro/intrebari-frecvente>.

¹⁸⁷ The DCNO did not provide information on the costs of delivery.

¹⁸⁸ Survey question 34.

¹⁸⁹ In EE and IT, the application process has not been defined yet.

Figure 3 - User-friendliness of the application process



Source: Author's elaboration based on online survey¹⁹⁰

With the exception of CY, the number of applications received corresponds to the number of Cards issued, suggesting that there were no cases of refusals. In CY, the number does not coincide because there are still 317 applications under examination (Table 23).

Table 23 – Number of beneficiaries and number of applications received per MS

MS	N. of applications received ¹⁹¹	N. of Cards issued ¹⁹²
BE	74,565	74,565
CY	2,427 ¹⁹³	2,110 ¹⁹⁴
EE	0	0
FI	5,157	5,157
IT	0	0
MT	11,009 ¹⁹⁵	11,009 ¹⁹⁶

¹⁹⁰ Survey question 38. 6 DCNOs (BE, CY, FI, IT, MT, RO), 22 PAs (3 BE, 1 FI, 18 RO).

¹⁹¹ Survey question 33.

¹⁹² Survey question 29.

¹⁹³ The number that the DCNO reported in the online survey is 1,245. However, consultation with the national expert revealed that 1,245 figure refers only to 2017 (137 applications) and 2018 (1,108 applications). Hence, we also included applications received in 2019 (1,182) in the table. The data are current as of 12/12/2019.

¹⁹⁴ The number reported by the DCNO through the online survey is 953. However, following consultation with the national expert, it emerged that 953 considers only Cards issued in 2019. 2,110 is the number updated to 12/12/2019.

¹⁹⁵ The number reported by the DCNO is 3,997. The DCNO provided the number updated to 03/06/2020.

¹⁹⁶ The number reported by the DCNO is 3,997. The DCNO provided the number updated to 03/06/2020.

MS	N. of applications received ¹⁹¹	N. of Cards issued ¹⁹²
RO ¹⁹⁷	14,649 ¹⁹⁸	14,649 ¹⁹⁹
SI	_200	7,589 ²⁰¹

Source: Author's elaboration based on online survey and consultation with the DCNOs

In all the participating Member States, **security mechanisms** were established to prevent Card fraud and to protect the personal data of beneficiaries. Notably, protection from unauthorised duplication of the Card and unauthorised use of personal information is ensured through an EU hologram (FI, MT, RO) or a microchip (CY, FI, MT and SI) on the Card.

In BE, the Cardholder must notify the regional or federal agency about the loss of the Card to obtain a new Card. Similarly, in FI and MT, the Cardholder needs to get in touch with the DCNO to report the loss and apply for a new card. In RO, the Cardholder is required to request a new Card by contacting the local DGASPCs and including a declaration of theft when submitting the application. In SI, the Cardholder reports to the Administrative Authority to inform about the loss of the card. CY is the only Member State where the Cardholder is required to report the loss of the Card to the police and then notify the DCNO in order to receive a new Card. In most cases, no extra payment is required (CY, FI, MT, SI), except in RO where the Cardholder pays the cost for the issuing of the new Card. Similarly, in BE, the information provided on the website states that there is a fee for requesting a new Card; however, the DCNO has never requested payment to date.

Member States also establish mechanisms for the protection of data from the national databases (BE, CY, FI, MT, RO, SI)²⁰². In CY, a password system is used to protect the information. In FI, personal information cannot be shared with third parties without consent; moreover, only Card numbers are stored, while beneficiaries' data can be stored for a maximum period of four months. In MT, the databases are hosted on a secure cloud protected by mandatory security regulations and only CRPD employees have access to the databases of eligible persons and beneficiaries. In RO, access to the database of beneficiaries is protected through passwords at the local level and administrator credentials at the DCNO. In SI, to ensure credibility and protection of data, only administrative units were granted access to the Card recipients' personal information.

National packages and benefits provided

The **sectors** covered by the Card are culture, leisure, sports and transport, both private and public. However, Member States are left free to decide on the sectors covered by the Card at the national level, and to define the national packages of benefits accordingly. Hence, the sector coverage of the national Card's schemes varies across Member States (Table 24).

¹⁹⁷ In RO, there are 295 applications still under examination.

¹⁹⁸ The number reported by the DCNO through the online survey is 10,098, including only Cards issued in 2017 and 2018. The information included in the table was provided by the DCNO during the focus group, including also Cards issued in 2019.

¹⁹⁹ The number reported by the DCNO through the online survey is 10,098, including only Cards issued in 2017 and 2018. The information included in the table was provided by the DCNO during the focus group, including also Cards issued in 2019.

²⁰⁰ The DCNO of SI did not provide data on the number of applications received.

²⁰¹ Interview with the National Council of Disabled People's Organisation.

²⁰² Survey question 97. The DCNO of EE did not respond to this question.

Table 24 - Sectors covered by the Card

MS	BE	CY	FI	MT	RO	SI
Culture	✓	✓	✓	✓	✓	✓
Leisure	✓	✓	✓	✓	✓	✓
Sport	✓	✓	✓	×	✓	✓
Public transport	×	× ²⁰³	✓	× ²⁰⁴	×	✓ ²⁰⁵
Private transport ²⁰⁶	×	✓	✓	✓	×	×

Source: Author's elaboration based on consultation with the DCNOs

In all Member States issuing the Card both the **culture** and the **leisure** sectors are covered. MT is the only Member States not to include **sport**. The coverage of the transport sector is more heterogenous across Member States and notably:

- **Private transport** is covered in CY, FI and MT. The means of transport covered are urban and extra-urban buses (CY and FI²⁰⁷) and taxis (FI, MT);
- **Public transport** is covered/expected to be covered in FI and SI respectively, entailing benefits in trains and extra-urban buses²⁰⁸.

Key factors boosting/hampering transport operators' participation in the public transport sector

Assessment of the key factors hampering and/or incentivising the participation of transport service providers should take into account the nature of their participation: i.e. voluntary or mandatory.

- In the first case, it is essential that service providers receive complete and accurate information on the Card. Without clear information on the administrative and financial schemes behind its implementation, transport operators will lack the financial incentives to join the scheme and will instead risk being dissuaded by the fear of financial losses. In turn, providing transport operators with clear and comprehensive information on the rationale and objectives surrounding the Card is pivotal for leveraging non-financial incentives such as commitment to social inclusion, branding, etc. In such a context, raising awareness for the Card appears crucial in the case of voluntary service provider participation in the scheme. In this sense, the Finnish experience, in which the DCNO played an active role in persuading the main railway operator to adhere to the system, shows that the political commitment of the recruiting authority is crucial.
- When participation of transport operators is state-mandated, as in the Slovenian case, the recruitment process is not necessarily automatic, but negotiations may be needed, involving different stakeholders, such as transport operators, competent transport sector ministries and the DCNO. Negotiations may precisely concern the Card's administrative and financial scheme, the identification of a package of benefits and the pool of beneficiaries, etc. In the Slovenian case, discussions are ongoing concerning the potential extension of the target of disability-related benefits and the related supporting financial measures. This underlines the relevance of this topic at the negotiation stage, suggesting that early identification of the authority that will be in charge of covering the costs of the Card plays an important role towards the success of such negotiations.

²⁰³ This sector is not present in the country.

²⁰⁴ This sector is not present in the country.

²⁰⁵ This sector is expected to be covered as from 1st July 2020.

²⁰⁶ In all Member States, private transport operators which, according to national legislation, provide services in the public interest, have to comply with national laws and obligations, usually set in public procurement procedures.

²⁰⁷ See, for example, at: <https://www.ouka.fi/oulu/public-transport/tickets-and-fares>.

²⁰⁸ Vr.fi, the national railway company, provides this benefit. See at: https://www.vr.fi/cs/vr/en/assistants_ticket.

Regarding the disincentives that may discourage service providers from participating in the scheme, it is worth mentioning the issue of accessibility of transport facilities. In the concerned Member States, consulted stakeholders highlight that making transport accessible is the key condition to ensure the Card's successful implementation. The concerns expressed by the transport stakeholders suggest that limited accessibility not only hampers the effective implementation of the Card but can also act as a disincentive for transport operators. In fact, the risk is that transport operators perceive no added value of their participation in the Card's scheme.

Source: Focus group on the public transport

Among the Member States in which private and public transport sector have been covered, public support schemes were already in place prior to the introduction of the Card in CY, FI and SI. In all these countries, existing support schemes were extended to support the participation of transport operators within the Card's schemes. In CY, public subsidies are defined in tender agreements through which the state bestows transport services in the public interest to private entities. In FI, public transport operators do not receive financial support to provide free tickets to the personal assistants of persons with disabilities. However, the cost of such tickets is supported by the municipality of residence of the person with disability, where personal assistants can obtain a refund for the cost of the ticket²⁰⁹. In SI, since July 2020, concession agreements regulating the provision of services under the Card have been extended to the transport sector, including financial conditions for transport operators²¹⁰.

In two Member States (MT and SI), the Card also covers sectors in addition to those in scope. In MT, the national Card's website reports service providers in the leisure sector that offer price reductions on clothing brands and electronics, allowing for a wider interpretation of the concept of leisure. In SI, the Card's scheme involves service providers in education, which offer price reductions or free training courses, including training and social rehabilitation measures for people with deafness-blindness, and support services for families of persons with disabilities.

Participation of service providers is voluntary in BE, CY, FI, MT and SI, where the DCNO established individual contacts with service providers to be involved. In RO, where service providers covered by the Card are all state-owned, the scheme is legally binding. As for the transport sector, it is interesting to mention the FI case, where the national railway was involved in the project since its early stage. The involvement of a well-known service provider in FI triggered a multiplier effect. In particular, its nationwide scope prompted other service providers to join the system²¹¹.

Participation of service providers in BE

Despite lack of monitoring data on the number of service providers participating in the Card, the DCNO and public authorities in the field of disability in BE are generally satisfied with the level of participation of service providers. Notably:

- In the Flemish Region, there is significant participation of service providers in the Card system. After two years following the launch of the Card, there is a capillary involvement of service providers. In particular, out of 300 Flemish communities, service providers are aware of the Card in around 50 communities. Moreover, there is an increasing demand from the service providers to receive promotional material to advertise the Card.
- In the Walloon Region, there is no direct contact with the service providers involved in the Card system. Therefore, it is not known if the service providers participating in the Card system have already provided benefits to persons with disabilities, and if there was an increase in service providers offering benefits. However, there is continuing demand by service providers to participate in the Card. Moreover, AViQ

²⁰⁹ Focus group on public transport.

²¹⁰ Focus group on public transport.

²¹¹ Focus group on management of service providers across Member States.

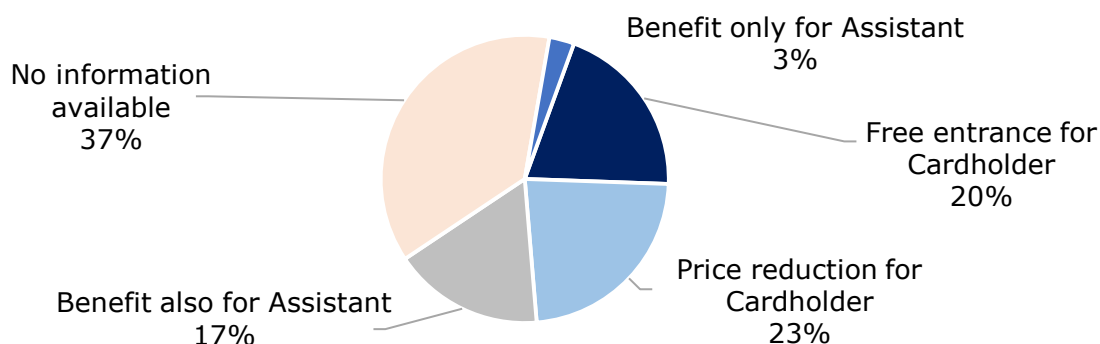
- is directly committed to ensuring the expansion of the number of service providers acknowledging the Card through the organisation of events, particularly in the tourism and sport sectors.
- In the German-speaking Community, all major service providers in the sectors of culture, leisure and sport were reached and currently participate in the Card. Most of the service providers involved already offered benefits to persons with disabilities prior to the introduction of the Card and then joined the Card's scheme. Most recently, the local football club league became a partner of the Card's scheme.

Source: Focus group on the cooperation model in a multi-level administrative system

In all Member States except for RO, DCNOs directly managed contact with service providers participating in the Card's scheme in all sectors in scope. Communication mechanisms were the same across all sectors and were run through individual contacts in CY, FI, MT and RO²¹². In most countries in scope, it was found that no regular communication channels were established to manage contact with service providers. In fact, a plethora of communication channels were leveraged, including emails, phone calls, surveys, events, etc. In addition, communication most usually happened on an *ad hoc* basis without any fixed communication timelines²¹³.

In terms of **benefits provided**, among the complete list of service providers adhering to the Card system and providing benefits such as free entrance (20%, n=250) and/or price reduction (23%, n=289), a large percentage (40%, n=464) do not present information about the types of benefits on offer.

Figure 4 - Type of benefits provided by the Card



Source: Authors' elaboration based on data from the national Card's websites

Among the service providers offering benefits (free entrance and price reduction)²¹⁴, there are differences among sectors (Figure 5). In particular, in the **culture sector**, almost half of service providers (n=193) offer free entrance to Cardholders, followed by price reduction (n=110). In the **leisure and sport sector**, providers mainly offer price reductions to persons with disabilities. Some service providers, (n=4)²¹⁵, including all those in the **public transport**, offering benefits to the Cardholders provide the same benefits to the assistant, while for **private transport** the two service providers offer price reduction only to

²¹² Source: survey with the DCNO.

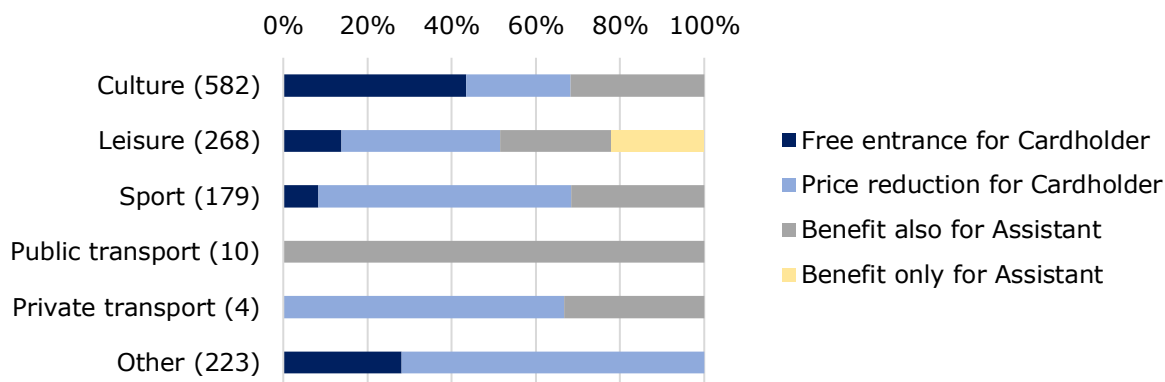
²¹³ Focus group on management of service providers across Member States.

²¹⁴ In order to give a detailed picture of the type of benefits (free entrance and price reduction) available to Cardholders and Assistants, the service providers which did not describe the types of benefits offered in their websites are not included in this analysis.

²¹⁵ In CY, the Cardholders get 50% discount for them and their assistants on private transport. In FI, Lahden seuden liikenne, Oulun joukkoliikenne and Koupion seudun joukkoliikenne offer free tickets to Cardholders on a wheelchair and to their personal assistant. Instead, the Finnish public railway, VR, offers only free entrance to the personal assistant and a discounted ticket (« saver » or « basic ») for the Cardholder with visual impairment or on a wheelchair.

Cardholders²¹⁶. For the remaining transport service providers, no information could be retrieved from their websites.²¹⁷ There are also service providers which are classified as “other” (n=193) which offer price reduction to Cardholders.

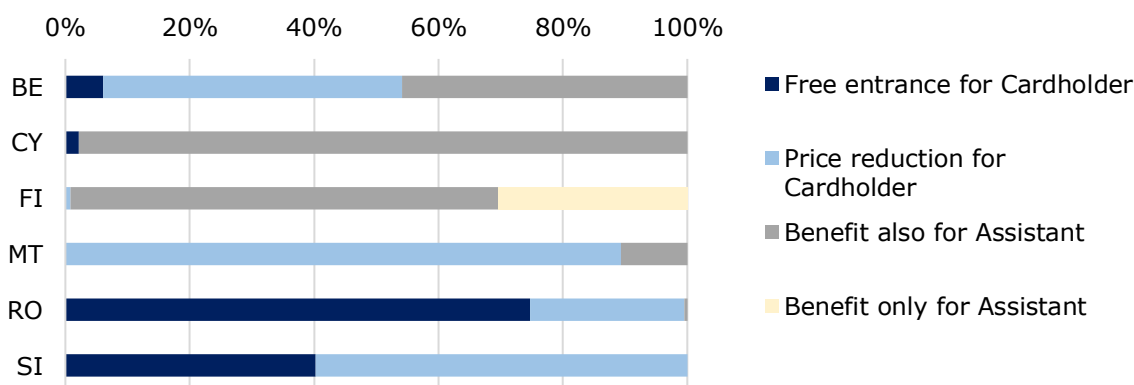
Figure 5 - Type of benefits and services offered by sector²¹⁸



Source: Authors' elaboration based on data from the national Card's websites

The distribution of benefits varies across Member States (Figure 6). In RO and SI, the service providers offer benefits to Cardholders only. However, in other Member States (CY, BE, MT), the assistant also benefits from free entrance and price reduction if accompanying the Cardholder. In FI, all service providers (n=110) offer free entrance to the assistant of person with disabilities, and some (n=75) also provide the benefits to persons with disabilities.

Figure 6 – Type of benefits offered per Member States²¹⁹



Source: Authors' elaboration of data available on national Card's websites

As far as the type of **benefits offered to the personal assistants** are concerned, service providers may decide to provide:

- The same benefit corresponding to the Cardholder;
- A different benefit from that provided to the Cardholder;

²¹⁶ Refers to the two cab companies in MT, hicabs and M cabs, that offer both a 10% discount to Cardholders.

²¹⁷ Refers to the remaining 7 service providers in the transport sector operating in Finland.

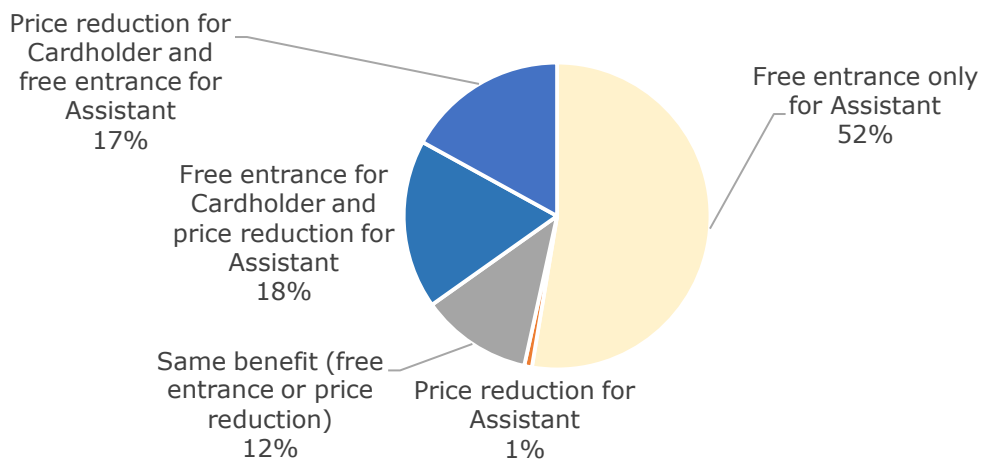
²¹⁸ The graph does not include the service providers which are not detailing the type of benefits offered on their websites.

²¹⁹ The graph does not include the service providers which are not detailing the type of benefits offered on their websites.

- The benefit only for the personal assistant.

As shown in Figure 7, half of service providers (n=130) provide free entrance only to the personal assistants, while the remaining half offer benefits to both Cardholders and personal assistants (n=117).

Figure 7 - Type of benefits offered²²⁰



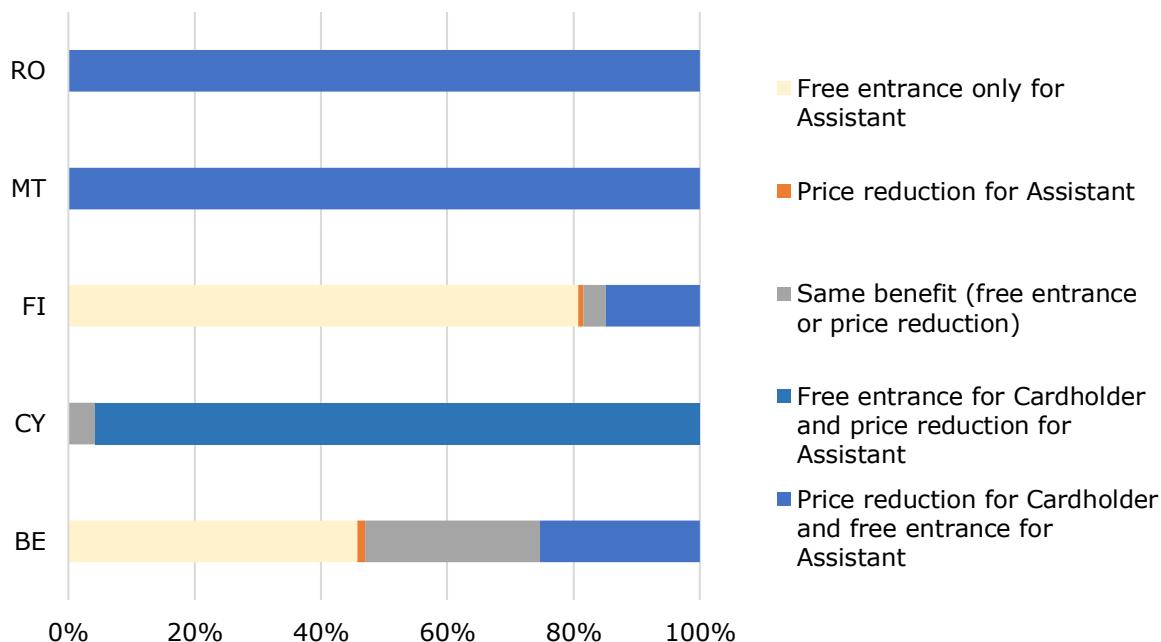
Source: Author's elaboration of data available on national Card's websites

The distribution of benefits offered to the personal assistants varies across Member States (Figure 8). In BE, service providers offer free entrance to the personal assistant (n=38) as well as the same benefits to Cardholders and personal assistants (n=23) or free entrance to the Assistant accompanying the Cardholder receiving a price reduction (n=21). In CY, almost all service providers (n=44) ensure free entrance to Cardholders and provide a price reduction to the assistant. In FI, a large number of service providers offer free entrance only to the assistant (n=92). As for the remaining Member States, the number of service providers offering benefits to the assistant is very limited²²¹.

²²⁰ The graph does not include the service providers who do not provide any details on the type of benefits offered on their websites.

²²¹ MT: n=3 and RO: n=1.

Figure 8 - Types of benefits offered to Cardholders and personal assistants per Member State²²²



Source: Author's elaboration of data available on national Card's websites

In three Member States (CY, FI, RO), the Cards of persons with a severe level of disability who are recognised as needing a personal assistant are marked with the symbol 'A'. In the other Member States (BE, MT, SI), service providers may voluntarily decide whether to extend the benefits offered to persons with disabilities also to their personal assistants.

Main problems identified with the use of the Card

Across pilot Member States, the main issues related to the use of the Card concern the low awareness of service providers (BE, CY, MT, RO, SI) as well as organisations (FI, MT, SI) involved in the fields of culture, leisure, sport and transport²²³. Notably:

- Some service providers registered in the national Card system do not recognise the Card (BE);
- Cardholders are not well informed about the benefits and services provided by the service providers (FI²²⁴);
- The voluntary participation of service providers implies that the sectors covered by the Card vary across Member States, raising some confusion among beneficiaries (FI);
- There is a limited number of service providers participating in the Card's scheme offering benefits to Cardholders (RO).

The second-round online survey with Cardholders confirmed these issues: among the respondents, 63% reported that the Card was not advertised enough, and 60.9% that they noticed low awareness among service providers when presenting the Card and 44.5% of

²²² The graph does not include the service providers which are not detailing the type of benefits offered on their websites.

²²³ Survey question 99: 6 DCNOs (BE, CY, FI, MT, RO, SI). 16 DPOs.

²²⁴ See at: https://www.facebook.com/groups/2029562290488140/?ref=group_header.

them complained about the low number of Member States involved in the pilot. Other reported problems were, in order of magnitude, the low number of organisations involved in the sectors in scope (56%) and the fact that discounts are too limited (48.2%).

Finally, according to the DCNOs, there were no cases of complaints by persons with disabilities from a Member State not participating in the Card project who was refused any benefit or service due to not presenting the Card²²⁵.

The DCNOs are generally the authorities responsible for handling **complaints** from beneficiaries concerning the use of the Card²²⁶. In FI and SI, in addition to the DCNO, the social insurance institutions are entitled to address the complaints. The Cardholders using the helpline, reported varying levels of satisfaction with how their complaints were handled: 43.1% reported being fairly satisfied, 22.4% as slightly satisfied, whereas 20.7% indicated they were very much satisfied, and only 13.8% stated they were not satisfied at all.

6.1.4. Impact of the Card

Key findings

Finding 12 – The majority of participating service providers perceive that the Card contributed to increasing their awareness about the needs of persons with disabilities, leading them to improve the accessibility of their services. However, most Cardholders state that additional accessibility improvements should be made in order to make using Card more effective (EQ 11).

Finding 13 – Around half of consulted Cardholders confirmed that the Card increased their travel abroad²²⁷ to a slight extent or more, especially among the less educated with respect to those with a university degree and among those employed with respect to those in training, unemployed or retired. There is evidence of the importance of extending the action at the EU level, including the transport sector, in order to enhance travelling behaviours among persons with disabilities (EQ 12).

Finding 14 - According to both Cardholders and participating service providers, the use of the Card remains relatively limited, with one third of consulted Cardholders never using it, and another third using it once or twice. The limited number of participating service providers emerged as one of the key reasons for not using the Card, along with the low number of Member States and service providers acknowledging the Card (EQ 13).

Methodological note

In the absence of a centralised monitoring system recording the effective use of the Card, the analysis relies on self-reported information from the cardholders regarding their opinions and experiences related to the Card, and on the information reported by service providers.

This information was collected through the two rounds of the online survey. This section mainly takes stock of the results of the second online survey, given the higher response rate and the possibility of disaggregating the results by Member State.

The socio-economic characteristics of the sample of persons with disabilities completing the second survey raised the following issues.

The response rates are not homogenous across the six Member States. Roughly two thirds of participants are from MT and RO, the remainder being mainly represented by respondents from FI, BE, and CY. Unfortunately, despite repeated reminders, only four

²²⁵ Survey question 128.

²²⁶ Survey question 103.

²²⁷ The question does not specify the destination. We have anecdotal evidence that the Card was used also in countries not participating in the programme such as Sweden, the Czech Republic, Turkey and even Australia.

Slovenian cardholders completed the survey, which does not allow for a proper analysis for SI. Meaningful conclusions cannot be inferred from only four respondents without imposing unrealistically strong assumptions. Given this information gap, respondents from SI are excluded throughout the analysis.

Due to the fact that response rates vary by Member State and are not proportional to either the population of eligible cardholders or to the effective number of cardholders, all aggregated results and regression estimates are based on a weighting procedure through which individual responses from a given Member State are weighted by the number of Cardholders from that country in order to make the results more representative of the overall population. The case of BE is provided as an example to clarify the weighting methodology. About two thirds of total Cards were issued in BE, but in the survey only 12% of respondents are from BE. Thus, through the weighting procedure, respondents from BE receive a larger weight in the estimation process to reflect the overall distribution of cardholders across Member States.

The sample is balanced in terms of gender. There is a higher proportion of respondents above the age of 50 which is in line with estimates from large administrative datasets. In contrast, with respect to education, employment status and employment category, the sample appears to be quite different from the overall population of persons with disabilities: the number of graduates and the share of employed are higher than expected and a non-negligible share of the sample holds a management, higher technical or higher administrative position. Despite these differences, without socio-economic data on the entire population of the cardholders, it is not possible to assess whether these respondent characteristics are due to (i) the selection of persons with disabilities into the programme (e.g. cardholders may be better educated than the overall population of eligible persons) or due to (ii) the selection of Cardholders into the survey (e.g. the survey link may have been shared with more educated Cardholders). Given these conditions, the representativeness of the sample with respect to socio-economic characteristics cannot be assessed. Competent public authorities, having information on the characteristics of the population of Cardholders, could not share their data due to GDPR concerns. Assuming the sample is representative of the population of Cardholders would imply that the take-up rate of the Card is greater the higher the socio-economic status of participants, who already have a higher propensity for cross-border tourism and cultural activities, as well as higher financial capacity, and thus potentially less need for the Card. If this is the case, then future extensions of the Card should investigate how the project could be more attractive to persons with disabilities of lower socio-economic status.

In order to investigate the association between socio-economic characteristics and the outcomes of interest (opinion on increase in tourism, cultural and sport participation, Card's use etc.), multivariate regression models were used. They represent a widely used statistical technique which allows to measure the correlation between the explanatory variables and the outcome variable, taking into account the influence of other observable factors. For instance, if differences in Card use between males and females are being investigated, it has to be ensured that what is being compared is just 'males and females', all their other characteristics being similar (e.g. same educational attainment, age class, employment status etc.) in order to guarantee that the differences observed are not driven by other characteristics, possibly influencing their respective use of the Card.

Statistical significance of data

In all the reported tables, the statistical significance (or level of confidence in the estimated coefficients) is reported using the “**” and “+” symbols. The symbol “****” indicates a 99% level of confidence that the difference observed is different from zero. “***”, “**” and “+” indicate confidence levels of 95%, 90% and 80% respectively. No symbol indicates that there is not enough evidence to indicate that the groups are different. Most estimated models will have binary outcomes.

Increase in tourism, cultural and sport participation

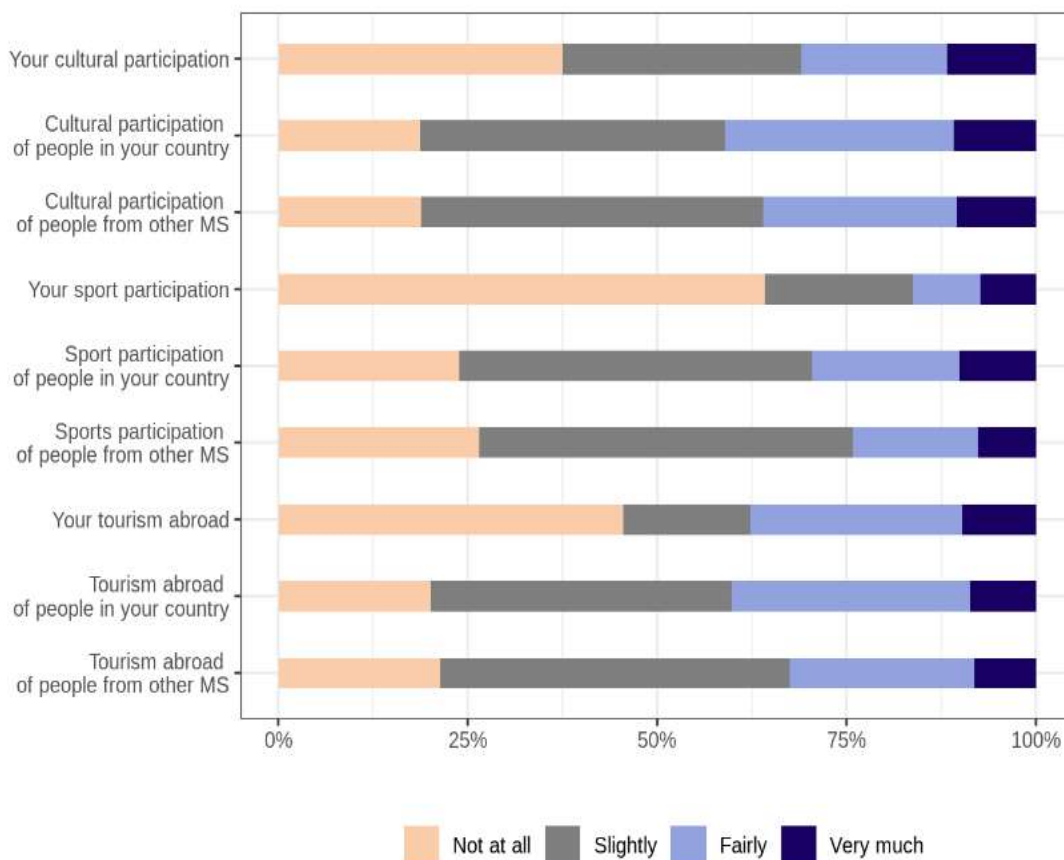
Survey respondents were asked to report the extent to which they believe the Card contributed to increasing their participation in tourism, cultural and sport activities, on a scale ranging from “not at all” to “very much” (Figure 9). At the aggregated level for the five Member States, it can be observed that about 30% of Cardholders perceive their personal cultural (and leisure) participation to increase fairly or very much due to the Card, while 33% consider their cultural participation to have increased only slightly and the remaining 37% believe their cultural participation did not increase at all. The situation is less positive with respect to sport participation²²⁸. More than 60% of respondents report their sport participation not to have increased at all, while only less than 20% think their own participation in sport activities has increased fairly or very much as a result of the Card. Views are far more polarised regarding tourism abroad, with more than 35% reporting a fair or large increase, while around 45% report they did not increase their tourism activities abroad at all by having the Card.

Cardholders are in general far more positive about the effect of the Card on other national and international Cardholders. This is indeed the case for the three activities considered: cultural and sport participation and tourism abroad. This could be a pure social-comparison psychological effect, but it may also reflect the potential selection into the survey discussed previously. Notably, if survey respondents have a higher socio-economic status, and thus potentially a lower need for the Card than other Cardholders, they may perceive that the Card had a stronger effect on other Cardholders since others seem to have a higher need for it than themselves. The latter explanation is not backed up by the data: highly educated or employed participants are not more likely to report a higher impact of the Card on others than on themselves. Thus, the focus of the following analysis is only on the opinions²²⁹ regarding the change in behaviours of the respondents themselves.

²²⁸ This finding is based on the survey of Cardholders. We do not have data on the general population’s sport participation for the same period. In addition, the survey question was specific to a perceived increase in sport participation as a result of the Card. Regarding the multiplication effect, most Cardholders stated that transport should be included; thus, it is likely that the Card’s use in all the other sectors in scope would increase if transport benefits became available in all Member States.

²²⁹ In addition to the survey, qualitative evidence from case studies and interviews was retrieved. At the moment, there are no administrative data available to supplement the survey findings. Findings from the survey of Cardholders were always triangulated with the findings from the survey of service providers. In general, findings are very coherent. Unfortunately, the Card’s use was not monitored by service providers or DCNOs. This is a key aspect to be considered if extending the programme.

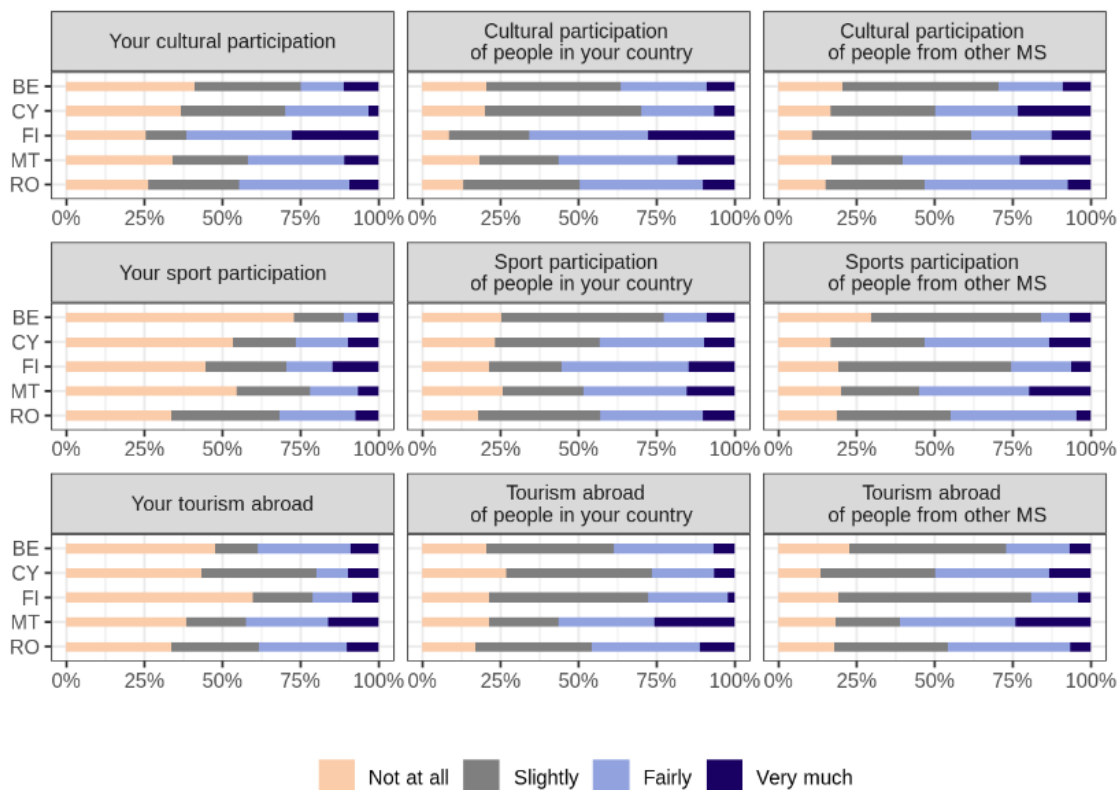
Figure 9 - Opinion on the effects of the Card across Member States on cultural and sport participation, and on tourism abroad



Source: Author's elaboration based on second-round online survey, questions 19-21

Moving to the results by Member State (Figure 10), while some differences do exist, in general a rather uniform pattern can be observed for all Member States. With respect to cultural participation, around 75% of the respondents in FI and RO perceive at least a slight increase due to the Card. In FI more than 50% feel there to be a fair or a large increase. In contrast, in BE and CY only about 25-30% hold this view. Regarding participation in sport activities, once again respondents from BE are the least positive about the impact of the Card, with roughly 75% reporting no effect of the Card. Conversely, in RO, around 70% perceive at least a slight improvement, even if only about 30% state that this improvement was fair or large in magnitude. Finally, it can be observed that respondents from RO increased their tourism activities abroad, at least slightly, in 66% of the cases, compared with 62% in MT, 57% in CY, 52% in BE, and 40% in FI. The low increase in FI can be explained by its already very high tourism participation levels before the implementation of the Card. Nonetheless, all the above-mentioned Member States, with the exception of RO, have annual tourism participation levels in the general population above 60%, which might point to an already wide diffusion of tourism habits even among the Cardholders.

Figure 10 - Opinion on the effects of the Card on personal cultural and sport participation, and on tourism abroad, by Member State



Source: Author's elaboration based on second-round online survey, questions 19-21

After analysing the aggregated opinions and country differences, in the following, differences by socio-economic characteristics are investigated through multivariate regression models and presented in Table 25. The outcome variables listed in the column headers are dichotomous, taking the value of 1 if the respondents report at least a slight increase due to the Card and the value of 0 if they perceive no improvement. Starting with the opinion on the increase in personal tourism abroad, it can be observed that there are no differences by gender or age group. In contrast, educational attainment and employment status are quite strongly associated with the opinion on the increase in tourism abroad. Respondents with a university degree report a lower increase in tourism abroad due to the Card compared to the other categories. This was somewhat expected as mentioned above. It is likely that more highly educated individuals were more used to travel abroad for tourism even before the introduction of the Card, thus the Card was expected to affect them to a smaller degree. Turning to employment status, employed individuals are significantly more likely to report at least a slight increase in cultural participation than those who are unemployed, out of the labour force, retired or in training. This is of concern, since it suggests that, for the more vulnerable economic categories, the Card may not be sufficient to increase their tourism abroad. With respect to cultural participation (second column), similar differences can be observed, even though these are smaller in magnitude and less precisely estimated. Finally, with respect to sport participation, respondents in the age group 50-64 are less likely to perceive an increase in the sport activities compared to the 18-34 reference age group, while education and employment status point in the same direction as before, even if not all differences are statistically significant.

Table 25 - Regression models: association between socio-economic characteristics and the probability of perceiving at least a slight increase in tourism abroad, cultural and sport participation due to the Card

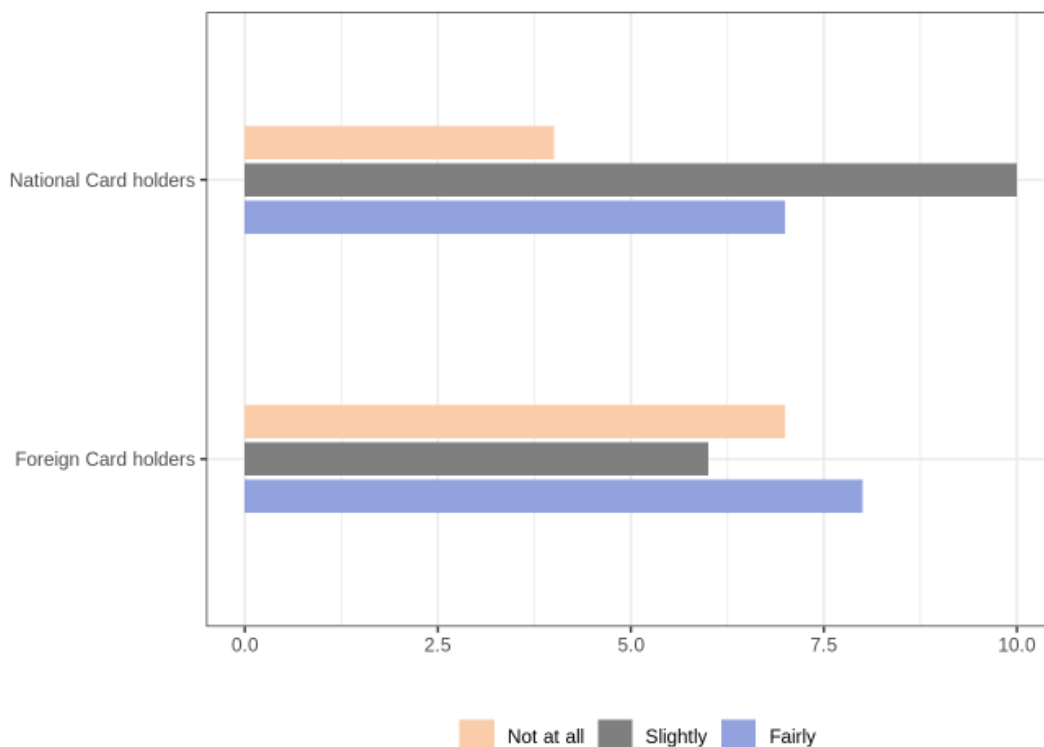
Variables	Tourism abroad	Cultural participation	Sport participation
Gender (ref. Female)			
Male	0.04	0.09+	-0.01
Age (ref. 18-34)			
35-49	-0.01	0.15*	-0.08
50-64	-0.06	-0.08	-0.22***
65 or older	0.06	0.09	0.02
Education (ref. High school or less)			
University degree or equivalent	-0.18***	-0.12**	-0.2***
Employment status (ref. Employed)			
Not working and looking for a job (i.e. unemployed)	-0.23+	-0.24+	-0.1
Not working nor looking for a job (i.e. not in the labour force)	-0.45***	-0.11	-0.17**
Retired/pensioner	-0.2**	-0.09	-0.11+
Self-employed	-0.1	-0.27	-0.17
Student or in training	-0.52***	-0.13	-0.09

Source: Author's elaboration based on second-round online survey, questions 3-6, 19-21

To briefly summarise the results presented so far: on average Cardholders perceive only a relatively modest increase in tourism abroad, cultural and sport participation as a result of the Card. There are some differences between the Member States, with more positive reports from FI and RO and less positive reports from BE, but they are not striking in magnitude. Less educated or employed individuals perceived a larger improvement relative to the other socio-economic groups.

The views of Cardholders are mirrored by those reported by service providers. Service providers were asked to what extent the Card contributed to increasing the number of nationals and foreigners with disabilities accessing their services. Results are reported in Figure 11 below. Generally, the findings point in the same direction with slight differences: (i) four and seven out of the 21 service providers responding to the survey perceive no contribution of the Card to increasing the number of nationals and foreigners with disabilities, respectively, accessing their services; (ii) no service provider perceived a large increase; and (iii) while a larger number of service providers perceived no change due to the Card among foreigners than among national Cardholders, a roughly an equal number saw a fair increase for both groups.

Figure 11 - Opinion of service providers on the effects of the Card in increasing the number of persons with disabilities accessing their services, across Member States²³⁰



Source: Author’s elaboration based on second round online survey, questions 51-52

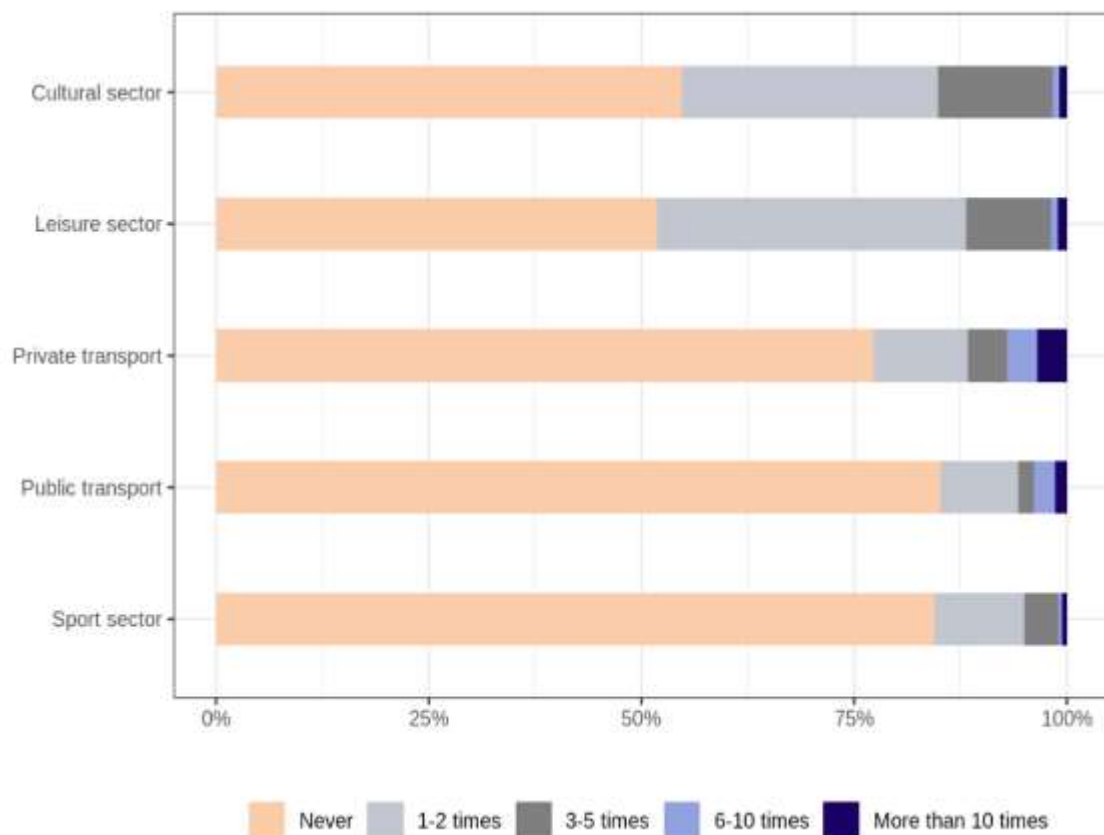
Card’s use by sector in the past 12 months

A second measure of the impact of Card on the behaviour of Cardholders is the actual use of the Card. Respondents report how many times they used the Card in each sector in scope in the past 12 months. Looking first at the aggregated results by sector, reported in Figure 12 below, one can immediately notice that the Card was not frequently used. In all sectors, more than 50% of respondents report never having used the Card. As expected, this share is larger in the transport sector since in several Member States transport was not covered; but surprisingly, it is even larger in the sport sector around 85% did not use the Card in this sector in the past 12 months²³¹. The results are more positive for the culture and leisure sectors. This was to be expected, given the larger number of service providers from these sectors participating in the pilot action. Indeed, 30% and 36% of respondents used the Card once or twice, respectively, in the cultural sector and in the leisure sector. About 10-13% used the Card three to five times in these two sectors in the past year. Only around 1% used it more often than that. It must be noted that a higher number of respondents (around 5-8%) used the Card six to ten times or more in the transport sector. In line with other survey results, transport appears to be a sector of particular interest to Cardholders if included in the benefits package. Including transport may result in a multiplier effect, increasing Card’s use across all sectors in scope.

²³⁰ Second round online survey, questions 51-52.

²³¹ Even though sport was less covered than culture or leisure, it was, nonetheless, better covered than transport (179 service providers in sport, only 14 in transport). With such an arithmetical ratio, it is surprising that the Card was used less in the sport sector compared to the transport sector.

Figure 12 - Use of the Card in the previous 12 months across Member States, by sector

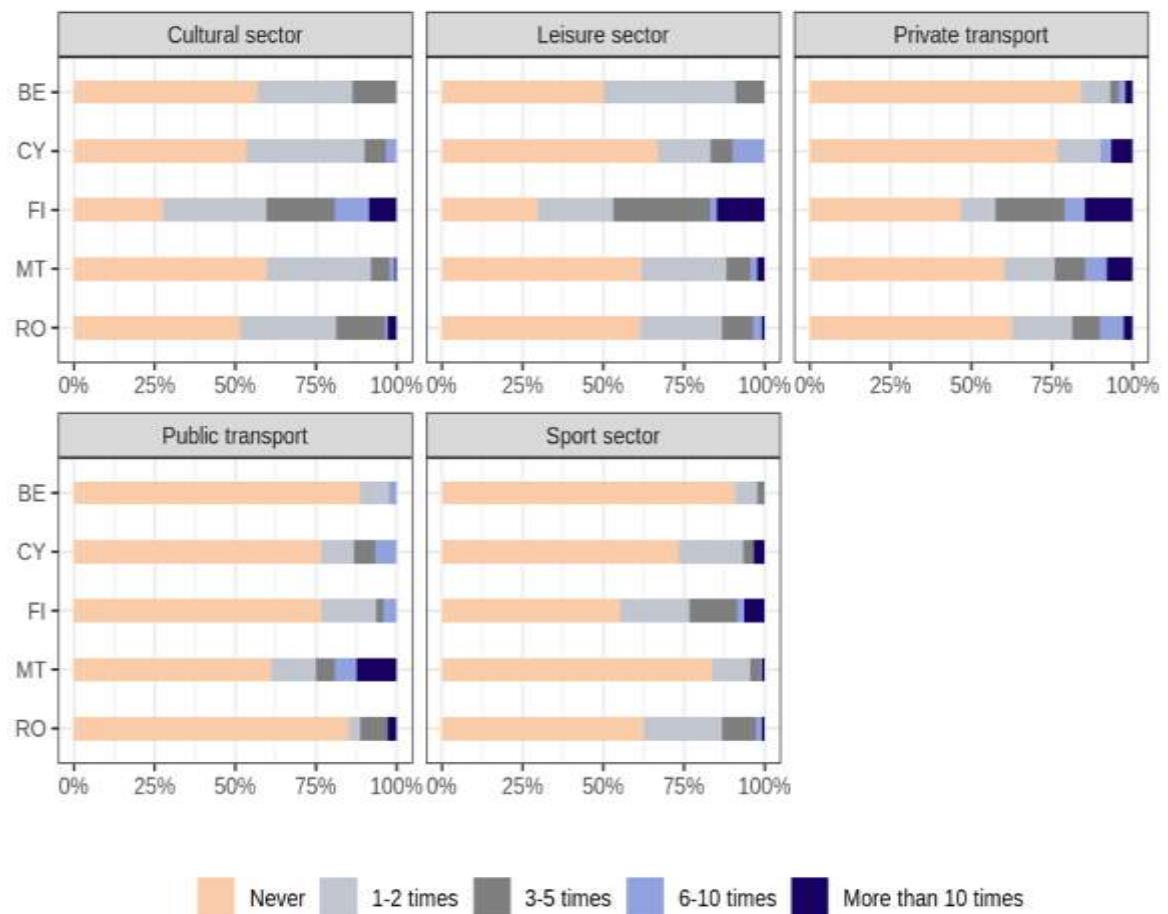


Source: Author's elaboration based on second-round online survey, question 18

Across Member States the use of the Card is again relatively limited as pictured in Figure 13 below. With the exception of public transport, FI stands out in terms of Card's use in the past 12 months: 70-72% of respondents used the Card at least one to two times in the cultural and leisure sectors, while 8.5% and 15% report having resorted to the Card more than ten times in the two respective sectors. In the other Member States, 50% or more of respondents report never having used the Card in the cultural or leisure sectors. Some respondents report having used it three to five times or more, but these shares are relatively low (culture: BE 14%, CY 10%, MT 8%, RO 19%; leisure: BE 9%, CY 17%, MT 12%, RO 13%). With respect to transport, usage rates are strikingly low even in countries where transport benefits were provided (CY, FI, MT)²³². While some Cardholders did use it frequently, the vast majority never did. Regarding the sport sector, again usage rates are very low, while slightly higher in FI and RO, but in all Member States, 50% or more Cardholders, never employed the Card in this sector in the past 12 months.

²³² No additional evidence was available for this point nor any possible related explanations. It is possible that even though transport is covered, the number of service providers is not sufficient to cover the transport needs. Indeed, even in the countries where transport was included, a significant share of Cardholders was either only slightly or not at all satisfied with the benefits provided in this sector.

Figure 13 - Use of the Card in the previous 12 months, by sector and Member State



Source: Author's elaboration based on second-round online survey, question 18

The regression models, presented in Table 26 below, investigate whether socio-economic characteristics influence the probability of having used the Card in the previous 12 months. Some significant findings can be observed: (i) males are slightly more likely to use the Card in all sectors except for transport; (ii) respondents in the 50-64 age group less frequently use the Card than those in the youngest category (aged 18-34) in all sectors in scope; (iii) older respondents (aged over 65) resort to using the Card significantly more for public transportation; (iv) a higher education level is negatively correlated with the use of the Card only in the sport sector; (v) unemployed respondents use the Card more in the sport sector than employed respondents; (vi) those out of the labour force are less likely to use it for public transport, but are marginally more likely to use it for private transport; and (vii) students use the Card the least across all sectors. To an extent, these findings are relatively similar to the ones on opinions regarding the increase in cultural and sport participation and tourism abroad, as discussed above.

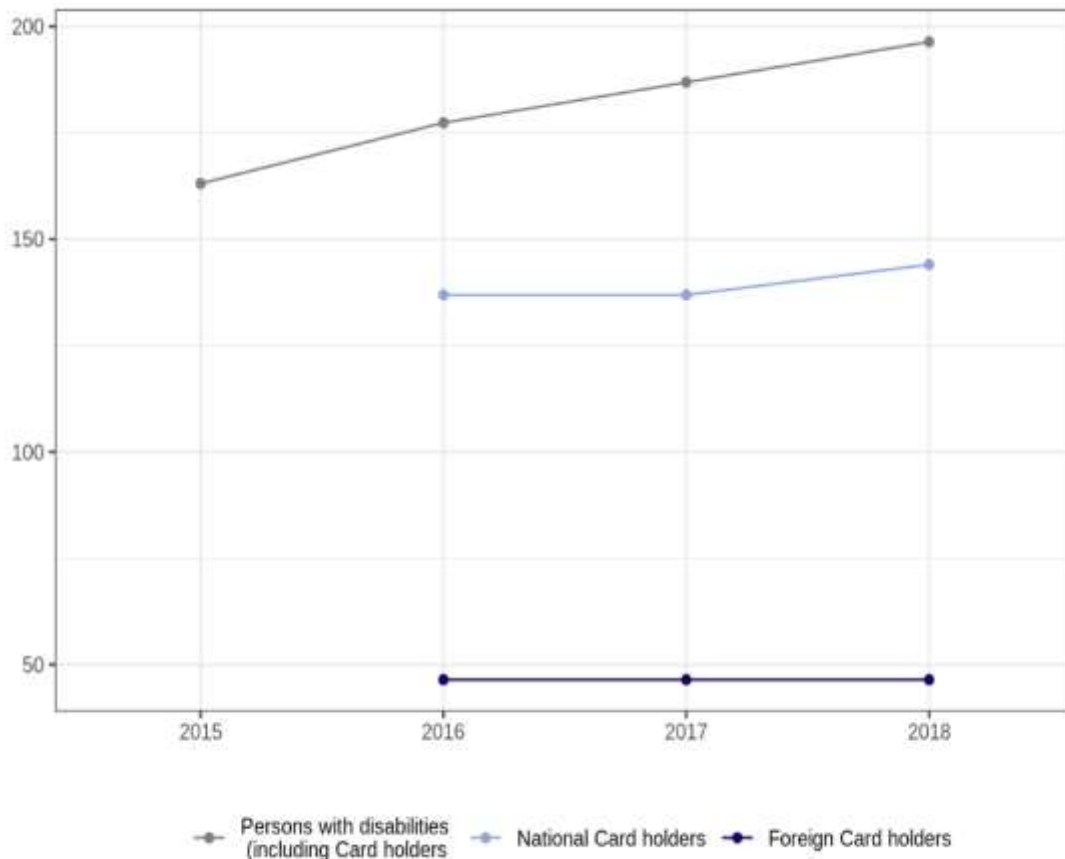
Table 26 - Regression models: association between socio-economic characteristics and the probability of having used the Card at least once in the past 12 months by sector

Variables	Cultural sector	Leisure sector	Sport sector	Public transport	Private transport
Gender (ref. Female)					
Male	0.09+	0.09+	0.06+	0.03	0.03
Age (ref. 18-34)					
35-49	-0.03	0.06	-0.11*	0.09+	-0.14**
50-64	-0.17**	-0.11+	-0.17***	-0.09+	-0.15**
65 or older	0.08	0.04	-0.14*	0.24**	-0.04
Education (ref. High school or less)					
University degree or equivalent	0.05	-0.07	-0.11**	-0.07+	-0.03
Employment status (ref. Employed)					
Not working and looking for a job (i.e. unemployed)	0.17	0.26+	0.47***	0.05	0.2+
Not working nor looking for a job (i.e. not in the labour force)	0.02	-0.11	-0.04	-0.23***	0.09+
Retired/pensioner	-0.13*	-0.06	0.03	-0.05	0.07
Self-employed	0.03	0.09	0.17	-0.13	0.22
Student or in training	-0.43***	-0.41**	-0.23**	-0.23*	-0.22*

Source: Author's elaboration based on second-round online survey, questions 3-6, 18

Service providers' responses show that the customers with disabilities accessing their services did not increase by a large extent after the Card was introduced. Figure 14 below presents the average estimated number of tickets issued (i) to persons with disabilities (including Cardholders), (ii) to national Cardholders and to (iii) foreign Cardholders from 2015 to 2018. The figure clearly shows that the number of tickets issued to persons with disabilities appears to have increased moderately over time, while the number of tickets issued to Cardholders (national and foreign) has remained relatively stable over time, showing no clear sign of an upward trend. It cannot be inferred with certainty that the positive trend for persons with disabilities is due to the Card, since the trend was already present prior to the introduction of the Card during 2015-2016. Thus, it is possible that this increase may be the result of the Card, but also of other inclusion policies, economic growth, individual behavioural changes or other socio-economic factors.

Figure 14 - Average numbers of tickets issued annually to persons with disabilities, by category



Source: Author's elaboration based on second-round online survey, questions 48-50

Overall, it can be concluded that, on average, the Card is not frequently used in any of the sectors in scope, especially not in the transport and sport sectors. The situation is slightly more positive in the culture and leisure sectors, as expected, given the higher participation of service providers from these sectors. FI appears to be the country with the highest Card utilisation, while in the other countries the situations are very similar. Individuals in the age group 50-64 employ the Card the least, while students appear to be the least engaged to use the Card across all sectors.

On a more positive note, the concerns of certain service providers, which refused to participate in the Card because they expected that, by providing benefits, they would be overwhelmed by the number of persons with disabilities accessing their services, appear to be completely unfounded, even in the transport sector. It is extremely unlikely that service providers will be unable to accommodate the additional visitors due to the Card or that this will impose a substantial cost to them. Cardholders do not access all types of services provided on a regular basis simply because they are being offered free or discounted tickets. In addition, several other factors contribute to the decision to consume cultural, leisure, tourism, and sport activities. Participation in such activities is not very high also for individuals not facing the economic and activity limitation barriers of persons with disabilities.

This might be due to these services still presenting some accessibility barriers, or because even prior to the Card they were offering the same types of benefits to persons with disabilities.

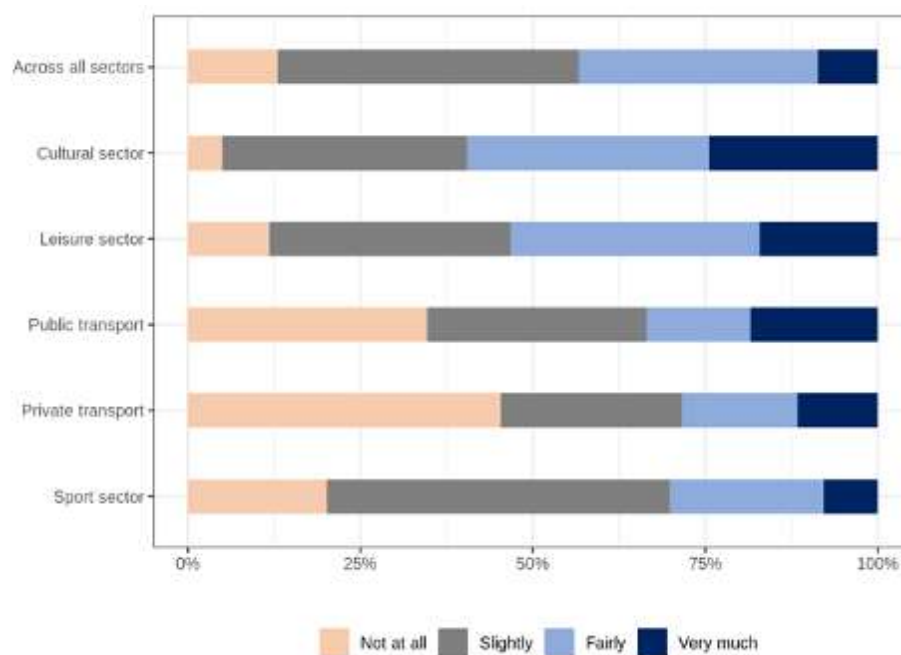
Satisfaction with the benefits provided

In order to understand why the use of the Card was not so extensive and most Cardholders used it less than once a month, their satisfaction with the benefits associated with the Card must be investigated as a possible reason for the limited usage. More precisely, Cardholders were asked the extent to which the number of benefits/services provided by the Card effectively responded to the needs of persons with disabilities in the different sectors, and more generally across all sectors (Figure 15).

The general coverage across sectors is regarded as fair or good by 45% of Cardholders, whereas 40% consider it only slightly satisfying and 15% are not satisfied at all with the benefits offered.

Services in the culture sector are those that appear to better address the needs of persons with disabilities, with 60% of respondents fairly or very much satisfied with coverage and another 35% slightly satisfied. Also, the leisure sector is assessed positively, with 55% of Cardholders at least fairly satisfied and 33% slightly satisfied. This finding confirms the previously formulated hypothesis: the Card is used more frequently in these sectors, given that more service providers from these sectors participated in the pilot action across all Member States. The sport sector receives more criticism, with only 30% of Cardholders at least fairly satisfied, and 48% only slightly satisfied with the benefits and services consisting of live sport events and sport activities. However, the greatest concerns relate to the transport sector: respondents indicated that 30% and 42%, respectively, are not satisfied at all with the benefits' coverage of needs for public and private sector transport. This is not surprising, given that these benefits were not covered in some of the participating Member States. Generally, there is a very strong association between the level of satisfaction with the benefits offered by sectors and the Card's use across each sector in scope.

Figure 15 – Coverage of needs of persons with disabilities by sector, across Member States



Source: Author's elaboration based on second-round online survey, questions 14-15

When the needs coverage is stratified also by Member State (Figure 16), not surprisingly dissatisfaction with the services in the transport sector is strongest in Member States not covering it. For instance, in BE, 38.6% report that public transport does not cover the current

needs at all, with this rate rising to 47.7% when it comes to private transport. Similarly, in RO, 33.6% give public transport the lowest coverage score, and more than half (52.3%) take a negative view of service coverage of private transport. Given that transport is not officially covered in these Member States, one would expect an even higher level of dissatisfaction with the benefits offered in this sector. The fact that this is not observed may be explained by two factors. First, qualitative evidence indicates that the Card is accepted by several service providers not participating in the programme. Secondly, Cardholders may have had the chance to use the Card in the transport sector abroad in Member States offering such benefits or even in other Member States which did not take part in the pilot action.

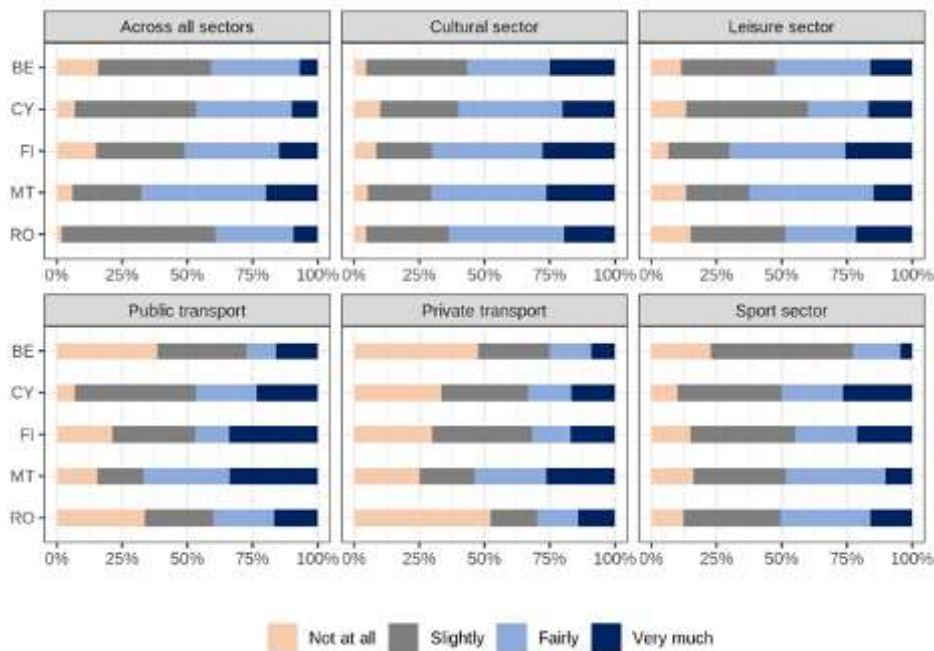
Across Member States, service coverage of private transport is consistently reported to meet the needs of persons with disabilities to a lesser extent than public transport. Nonetheless, even in the Member States where transport is included in the sectors of the Card, transport is the most criticised sector, with 25% to 30% of respondents completely dissatisfied with respect to private transport coverage in CY, FI, and MT, and less than 50% satisfied with the public transport coverage in CY and FI. Cardholders from MT are the least dissatisfied with the transport offer, both private and public.

The cultural sector received more positive feedback, with 56% of respondents indicating that they were fairly or very much satisfied in BE, while these figures rose to 60% in CY, 63.5% in RO, and around 70% in FI and MT. The leisure sector is evaluated as sufficiently addressing needs (the top two categories) by at least 50% of respondents in all Member States but CY (40%).

The sport sector is very similarly rated in CY, MT, and RO with around 50% of respondents satisfied at least to a fair extent with its coverage, whereas 22.7% of BE Cardholders and 44.7% of FI Cardholders are fairly satisfied or more with the benefits related to sport events and activities.

This finding is particularly puzzling. With the exception of sport, for all the other sectors we see a strong relationship between Card's use and the level of satisfaction with the benefits provided. For the sport sector, this is not the case: Cardholders are relatively satisfied with the benefits offered but rarely use them. This might be explained by lower accessibility or potentially lower interest in such benefits. The former is not supported by the data: a relatively low share of Cardholders, always below 10%, consider sport the sector with the highest need for reasonable accommodation.

Figure 16 - Extent to which the number of benefits/services cover the needs of persons with disabilities by sector, across Member States



Source: Author's elaboration based on second-round online survey, questions 14-15

After considering the satisfaction with the benefits at a descriptive level, it is necessary to look at the influence of socio-economic characteristics on it, by means of multivariate regression models (Table 27). If the coverage was regarded as fair or good, the value "yes" (one) was assigned to the dependent variable, instead for the "not at all" and "slightly" answers a value of "no" (zero) was assigned. Men tend to be more satisfied with the general offer across sectors (second column of Table 28) compared to women, whereas they are less satisfied than women with the benefits offered in the cultural and private transport sectors.

Cardholders who are older than 50 report more satisfaction with the culture and leisure benefits, compared to persons with disabilities who are younger than 35. The elderly, over 65 years old, are also more content with the transport offer, both public and private, than Cardholders younger than 35. This might be due to their heavier reliance on transport services.

Education level also affects satisfaction with the benefits: the Cardholders with a tertiary education degree are more likely to appreciate the offer of cultural and leisure services and less likely to be satisfied with the private transport offer than their peers with a high school diploma or less.

Employment seems to play a smaller role in driving satisfaction rather than use, with unemployed persons less content with the cultural offer and pensioners more satisfied with it than those who are employed.

Again, younger and less educated respondents believe that availability of more benefits would better cover their needs in the sectors in scope (see rows "50-64", "65 or older", and "University degree or equivalent" of Table 27).

Table 27 - Regression models: association between socio-economic characteristics and the probability of considering the coverage of the benefits, across sectors and per each sector, fair or sufficient.

Variables	Across all sectors	Cultural sector	Leisure sector	Sport sector	Private transport	Public transport
Gender (ref. Female)						
Male	0.14**	-0.1*	0.04	-0.05	-0.09*	-0.08+
Age (ref. 18-34)						
35-49	0.05	0	0	-0.17**	-0.07	-0.06
50-64	0.05	0.14*	0.12+	-0.14*	-0.03	0.03
65 or older	-0.03	0.44***	0.29**	-0.16+	0.37***	0.33***
Education (ref. High school or less)						
University degree or equivalent	-0.05	0.11**	0.09*	0.05	-0.12**	-0.08+
Employment status (ref. Employed)						
Not working and looking for a job (i.e. unemployed)	-0.11	-0.29*	-0.09	0.03	-0.21+	-0.08
Not working nor looking for a job (i.e. not in the labour force)	0.05	0.02	0.09	0.02	0.01	0.07
Retired/pensioner	0.05	-0.09	0.07	0.24***	-0.07	0.04
Self-employed	0.08	0.16	0.1	0.03	-0.18	-0.14
Student or in training	-0.17	0.19	-0.16	-0.14	-0.23*	-0.17

Source: Author's elaboration based on second-round online survey, questions 3-6, 14-15

Accessibility

Despite little change in customer inflows due to the Card, what clearly changed with the service providers was their attitude: they report that they are more aware of the needs of persons with disabilities. Since the introduction of the Card, most service providers have an improved understanding of the importance of accessibility of services, affirm to taking better account of persons with disabilities in their services, have gained new insights for the future development of their services, and especially better recognise the importance of their organisation's role in providing accessible services. In one instance a service provider reported that the total costs exceed the benefits, whereas others faced more criticism regarding the accessibility of their services.

Indeed, one third of service providers indicate that they have looked at accessibility-related legal requirements before participating in the Card pilot. Furthermore, since 2016, eight out of ten report to have improved the accessibility of their services in some ways, be it through ramps at the entrance, elevators, specifically designed tours, audio guides, or inclusive toilet

facilities. Among the reported reasons for these improvements, the main one is that they were requested by persons with disabilities themselves, but other reasons mentioned were to take advantage of upcoming renovations or to simply implement the changes as “It was a choice and seemed like the obvious thing to do”. Very few accessibility improvements were publicly funded, but the majority of service providers indicated that they would make further improvements if funded accordingly. This desire to make accessibility improvements among service providers further shows a positive attitude towards accommodating the needs of persons with disabilities in these sectors.

However, as accessibility of services was not required for service providers in all Member States in order to participate in the Card pilot, some Cardholders complained about the lack of clear information on the accessibility of the services offered and asked that this information be included on the service providers’ websites since it is crucial when planning a visit. In some Member States, such as BE and FI, an effort was made to ensure that accessibility information was always present in the websites of service providers²³³. Additionally, the vast majority of persons with disabilities surveyed expressed the wish that the Card were accompanied by accessibility requirements for the service providers. When asked for each sector if it should be more a priority for private or public services, respondents in all Member States agree that in culture and transport the public services should be made more accessible first. Accessibility of public services in the leisure sector is a priority in BE, FI and RO, whereas in CY and MT accessibility of public and private services is of equal priority. With regard to the sport sector, in BE, FI, MT, and RO, six Cardholders out of ten believe that public services need to improve accessibility more urgently than private ones, whereas in CY 55% indicate it is most needed in the private services.

Overall, it appears that, while some service providers did make **efforts to improve accessibility**, there remains significant room for improvement in this area. This is **a very important issue to be considered in the scaling up of the project to the EU level**. Additional policies encouraging and supporting service providers to improve accessibility – or enforcement of current accessibility rules - could potentially (i) allow more of them to participate in the programme, (ii) could increase the use of the Card by removing accessibility barriers, and (iii) would certainly improve the user experience and social inclusion.

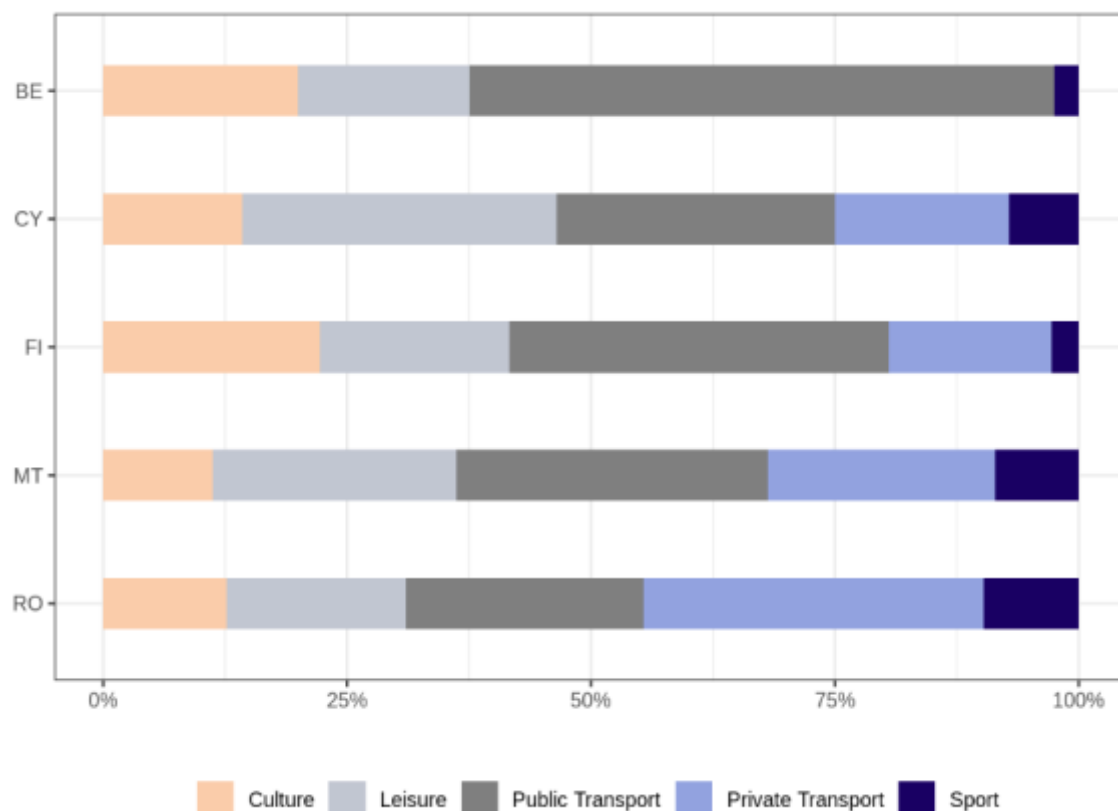
With respect to the need for the provision of reasonable accommodation, 88.9% of Cardholders consider that it should be made compulsory as a condition for participation in the Card’s scheme. The sectors where it should be addressed the most are illustrated in the figure below for each Member State (Figure 17).

Public and private transports are the sectors where accessibility is more urgent, as indicated by one out of every two respondents. The culture sector was identified as problematic by less than two out of ten Cardholders in each Member State.

Among possible solutions **to increase cross border mobility**, 69.6% of respondents pointed at the **need for more information** about accessibility to improve the planning, **and** 67.1% at the **need to increase transport benefits**.

²³³ Service provider websites were not always accessible, as the website accessibility was not a participation requirement for them. This should be considered for the future extension of the Card.

Figure 17 - Areas where the provision of reasonable accommodation should be addressed the most, by Member State²³⁴.



Source: Author's elaboration based on second-round online survey, question 28

Likelihood to recommend the Card

Given the limited use of the Card, a rather skeptical opinion on the increase of personal cultural and sport participations and of tourism abroad, as well as partial satisfaction with the benefits provided, it is highly relevant to assess if Cardholders would recommend the Card to other persons with disabilities. It must be emphasised that the Card is likely to be of value to persons with disabilities for uses other than the ones targeted by the pilot action. As mentioned previously, qualitative evidence suggests that persons with disabilities may be able to receive certain benefits at the national and international level by showing their national disability certificate or card. However, such documents are not always readily accepted, due to language barriers or concerns regarding their validity. The EU Disability Card, as an official EU document, may overcome and/or resolve these issues and may convey benefits even in countries not participating in the action²³⁵. Thus, if the application process does not require a substantial effort, having the Card may be very useful even if it is not used frequently in the targeted sectors.

Cardholders were asked how likely they were to recommend the Card to other persons with disabilities, on a scale from zero to ten.

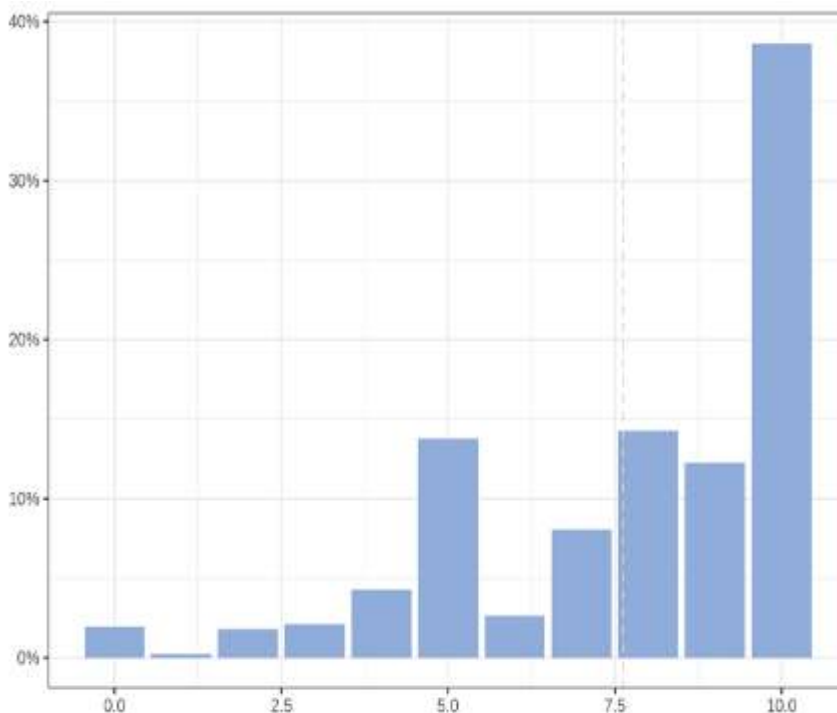
²³⁴ Second round online survey, Question 28.

²³⁵ The field research conducted for the case studies in MT and RO revealed that some Cardholders received benefits by showing the Card in several EU countries not participating in the programme and even in non-EU countries such as Turkey and Australia.

Figure 18 shows the distribution of the responses across Member States: almost 40% of the Cardholders are certain to recommend the Card. Another 26% of respondents give a score of eight or nine. An additional 24% assign a score between five and seven.

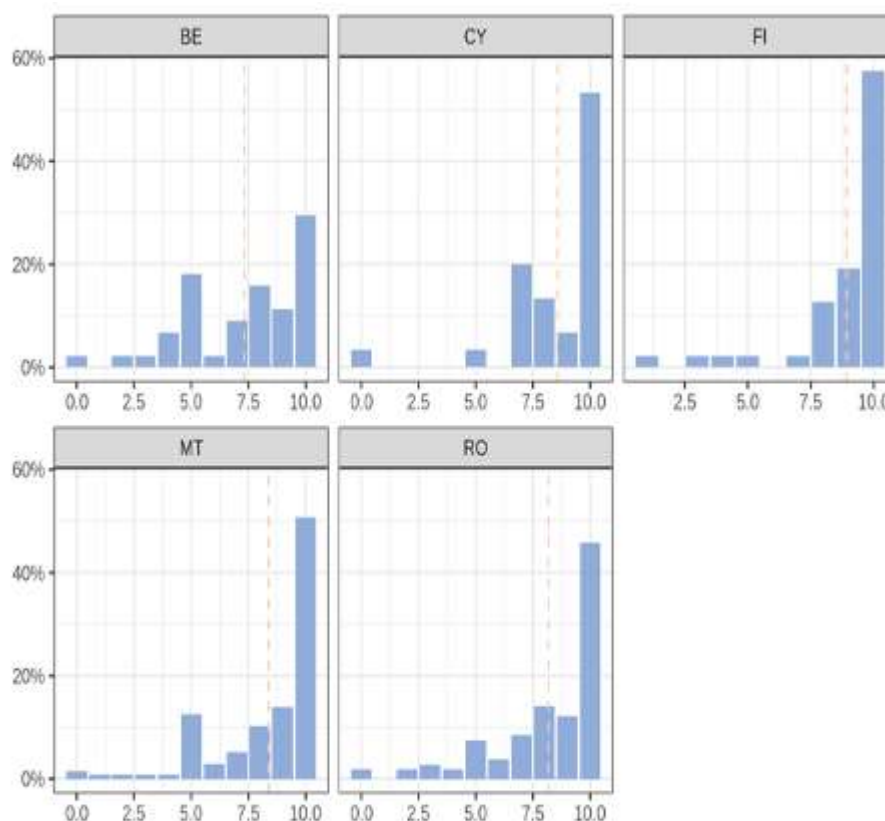
In the individual Member States (Figure 18), the average recommendation score is still consistently high, ranging from 8.9 in FI, 8.6 in CY, 8.4 in MT, 8.2 in RO, to 7.3 in BE. Cardholders from BE appear to be the least satisfied, with only 22.7% assigning the maximum score. In FI, however, almost 60% are certain to recommend the Card, as are 50% of respondents from CY and MT.

Figure 18 - Likelihood to recommend the Card to other potential users



Source: Author's elaboration based on second-round online survey, question 13

Figure 19 - Likelihood to recommend the Card to other potential users, by Member State



Source: Author's elaboration based on second-round online survey, question 13

When investigating the socio-demographic factors behind the likelihood to recommend the Card, the regression analysis employed maintains the zero to ten scale of the dependent variable.

The categories that are more likely to recommend the Card are males and the elderly (Table 28). Conversely, students and those in training are significantly less likely than those who are employed to recommend the Card. This suggests that additional efforts to include the needs of women and young persons with disabilities when designing the benefits package could improve their satisfaction with the Card.

Table 28 - Regression models: association between socio-economic characteristics and the likelihood to recommend the Card to other potential users.

Variables	Recommend the Card (0-10)
Gender (ref. Female)	
Male	0.46*
Age (ref. 18-34)	
35-49	-0.15
50-64	0.59+

Variables	Recommend the Card (0-10)
65 or older	1.03*
Education (ref. High school or less)	
University degree or equivalent	-0.15
Employment status (ref. Employed)	
Not working and looking for a job (i.e. unemployed)	-0.48
Not working nor looking for a job (i.e. not in the labour force)	0.43
Retired/pensioner	0.2
Self-employed	-1.14
Student or in training	-2.57***

Source: Author's elaboration based on second-round online survey, questions 3-6, 13

6.2. Efficiency

Key findings

Finding 15 - Total implementation costs for the DCNOs usually do not exceed €50 per Card issued, becoming as low as €5 when higher numbers of Cards are issued and expected to decrease even further as the programme is scaled up/the take-up rate increase (EQ 14). The costs borne by Cardholders were null for all Member States but Finland, where €10 were paid by each Cardholder to cover production and delivery.

Finding 16 - The costs borne by the service providers to grant discounts or free entrances are counterbalanced by their increased positive visibility towards the general public that in turn attracts additional customers. Furthermore, their participation in the Card's scheme has improved their social responsibility and attitudes towards disability (EQ 15).

6.2.1. Methodological note

This section presents the analysis of the costs of the pilot action, including (i) implementation costs and (ii) costs to service providers. The two categories of costs are fundamentally different, but equally important in assessing the feasibility of extending the Card to other Member States and possibly throughout all of Europe.

This section responds to very specific questions:

- What was the average implementation cost per Cardholder across Member States?
- Can economies of scale be expected, that is, would costs increase at a slowing pace as the programme is scaled up or do costs appear to be rather linear?
- What are the main implementation costs? Are they mainly: (i) one-time fixed costs, (ii) constant over time or (iii) increasing as the take-up rate improves?
- What are the main benefits and costs faced by service providers? Is there evidence that joining the programme represents a financial burden for them? How could benefits to service providers be maximised?

Given the relatively modest use of the Card and the perception of an increase in tourism abroad, cultural and sport participation due to the Card, average costs are likely to be relatively small and decreasing with scale when offset by the benefits (see section 6.2.5). It must be emphasised, however, that the perceived benefits of the Card and its use may also increase over time, as (i) the Card becomes more easily recognised by service providers, (ii) service providers improve the accessibility of the services offered, (iii) as more Member States join the Card's scheme, and (iv) as persons with disabilities increase their participation in cultural, sport and leisure activities thanks to the Card, it is likely that the impact of the Card will increase. Thus, the benefits considered in this analysis should be treated more as a lower bound of what could be expected over the long term.

6.2.2. Average implementation cost per Cardholder across Member States

A first step in the analysis of costs is to compute and compare the average implementation cost per Cardholder across Member States. Given the large difference in purchasing power parities (PPP) across the participating Member States, the costs are rescaled relative to the EU-27 level using the PPP for the year 2018, for which data are available for all Member States. Since the Card was not yet issued in EE and IT, these countries are excluded from this analysis.

Table 29 below lists the number of Cards issued, total implementation costs, EU grant, price index relative to the EU-27 level, total costs at EU-27 prices, EU grant at EU-27 prices, the cost per Cardholder and the grant per Cardholder for each Member State. One can immediately observe the large variation in the average costs across the Member States, ranging from only €4.57 in BE to €70.59 in SI.

Looking at the implementation costs, BE has the lowest cost of production per Card. Since there are no significant differences in the implementation costs between BE and the other Member States, the low cost per Card in BE seems to be mainly driven by economies of scale since BE issued the highest number of Cards in absolute terms. Indeed, most of the implementation costs are either fixed one-time investments or independent of the number of Cardholders. Therefore, it is expected that, as the take-up rate of the Card increases, the implementation cost per Cardholder will decrease. As a result, implementation costs are likely to become small relative to the perceived benefits enjoyed by persons with disabilities.

Table 29 - Total and per Card production costs

MS	N. Cards issued	Total costs (€) ²³⁶	EU grant (€)	Price/Price EU 27 (= 100)	EU grant PPP (€)	National contribution PPP (€) ²³⁷	Total costs PPP (€)	Average cost (per card) (PPP €)	Average grant cost (per Card) (PPP €)
BE	66,141	346,934	170,169	114.8	148,230.8	153,976.52	302,207.32	4.57	2.24
CY	2,110	85,312	97,702	89.9	108,678.5	-	94,896.55	44.97	51.51
FI	5,157	298,220	239,606	126.0	190,163.5	46,519.04	236,682.54	45.9	36.87
MT	8,157	119,121	130,454	85.2	153,115.0	-	139,813.38	17.14	18.77
RO	14,111	130,594	123,306	54.1	227,922.4	13,471.32	241,393.72	17.11	16.15
SI	7,589	467,163	406,419	87.2	466,076.8	69,660.59	535,737.39	70.59	61.41

Source: Author's elaboration based on desk research and consultation with the DCNOs

²³⁶ Total costs include both EU grants and national contributions.

²³⁷ No information was provided by the DCNO. Therefore, national contributions were computed as the difference between total costs and EU grants. As for CY and MT, EU grants exceed total costs, meaning that not all allocated EU funds have been already spent. Therefore, it was not possible to perform the computation of national contribution for these two countries.

6.2.3. Main implementation costs

Implementation activities are not monitored at the national level. As a consequence, available data on costs disaggregated by implementation activities are incomplete and not highly reliable. Thus, only some activities can be effectively compared: the Card production and delivery, the establishment and updating of the website, and awareness campaigns, all equivalised with PPP. It must be noted that, besides production and delivery costs, most of the other costs are either a one-time investment or remain constant as the Card take-up rates increase. This is a key factor in cost-effectiveness, since as the programme is scaled up, the average cost will decrease relative to the production and delivery costs, thus benefits are likely to offset the costs over time.

Table 30 below reports the costs by activity expressed at EU-27 price levels. **Production and delivery costs** vary considerably from around €1 for BE to €4.5 for FI.

It has to be noted that whereas certain **national Card's websites** fulfill accessibility standards, such as the website of BE, FI and RO, others do not like the one of CY. Furthermore, only the website of CY, MT, SI, and RO have all the benefits already listed in the national website, whereas for BE and FI only a list of participating service providers with their websites' links is available. Its establishment was outsourced to a private entity in BE, CY, MT, RO, whereas in FI and SI to a civil society organisation. CY and MT had the lowest costs of establishing the national website, FI paid slightly less than the double, and RO invested around €18,000. BE and SI managed to invest three times what CY and MT paid. However, the service providers included in the websites of BE and SI are of another magnitude, around 400 and 300 respectively, more than ten times the providers included in CY or MT. The costs can still be contained even with high numbers of service providers, as FI demonstrates. The FI example is particularly positive as they also invested in a patented software to read the text and in a testing phase with persons with disabilities.

Some Member States reported no costs of **updating the national website**, namely CY and RO. The information for SI is missing. Overall, the dedicated website is perceived to be updated regularly²³⁸ by stakeholders. The authorities in charge of the website updating are the DCNOs in CY, FI, MT and relevant public authorities in BE and RO²³⁹. The update is carried out on a regular basis in most Member States (BE, CY, FI, IT, MT, RO), and notably: anytime there is something new to be added (CY and FI), every two to three months (BE and MT), every seven to eleven months (RO), once a year (IT). One can observe that the lack of specifically allocated funds and personnel has consequences in the frequency of update, and therefore on the information available to the persons with disabilities.

Awareness campaigns, in spite of their cost, proved rather ineffective, given the low take-up rates across the Member States, but in MT. Indeed, MT had the biggest expenses and employed various channels of advertisement, including car wraps and TV adverts. However, the MT case is so peculiar given the replacement of its national Card and a higher take-up rate than in the other Member States was expected. BE though did not have a national Disability Card before, and with the second highest budget allocated to awareness campaign managed to become the biggest Card distributor in absolute terms. CY, FI, and RO spent all less than €30,000.

²³⁸ First round survey question 87. BE: DCNO, 2 PAs, SP, CSOs. CY: DCNO, 2 SPs, 3 CSOs. EE: 3 CSOs. FI: DCNO, SP, 8 CSOs. IT: DCNO. MT: DCNO, 3 SPs. RO: DCNO, 16PAs, SP, CSO. SI: 2 CSOs.

²³⁹ First round survey question 88. BE: DCNO, 2 PAs. CY: DCNO. FI: DCNO, PA. MT: DCNO. RO: DCNO, 10 PAs.

Table 30 - Comparable costs per activity, equivalised in EU 27 PPP

Cost	BE (€PPP)	CY (€PPP)	FI (€PPP)	MT (€PPP)	RO (€PPP)	SI (€PPP)
Production and delivery unit cost	1.02	4.54	3.97	3.40	2.03	2.21
Establishing the national website	21,777	7,524.32	13,037.30	7,629.11	18,341.96	22,935.78
Updating the national website	4,355.40	0.00	4,652.38	1,056.34	0.00	-
Awareness-raising activities	56,620.21	20,763.59	24,603.17	70,422.54	26,802.22	-

Source: Author's elaboration based on consultation with the DCNOs.

6.2.4. Costs to Service Providers

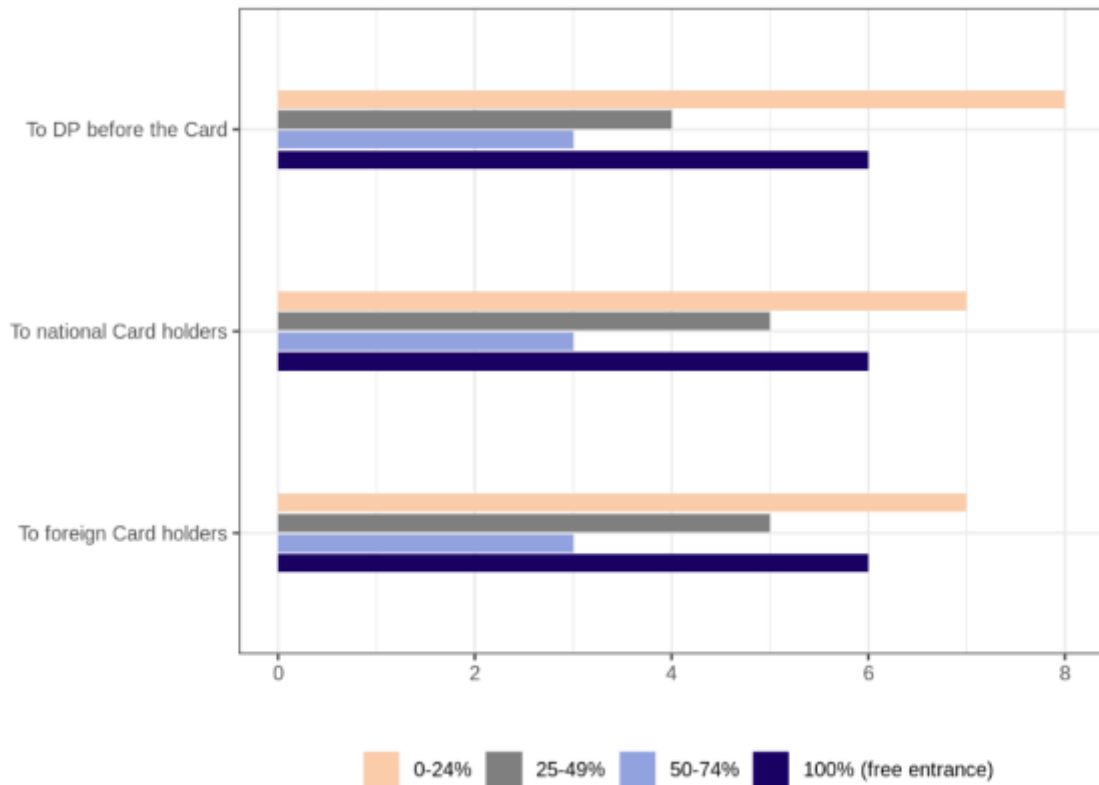
By participating in the programme, service providers bear costs that need to be accounted for in order to assess the risk of experiencing negative effects by voluntarily joining the programme. The two main categories of costs borne by service providers are (i) free or discounted services to Cardholders and their personal assistants and (ii) costs of increasing the accessibility of services. Even though accessibility is not within the scope of the Card pilot, it should be considered that (i) in some countries (e.g. MT), only service providers ensuring accessibility standards could participate in the national Card's scheme and (ii) accessibility of services is directly related to the effective use of the Card, thus these costs should be taken into account in light of a possible extension of the Card at the EU level.

6.2.5. Costs of offering free or discounted services

Consultation with the DCNOs showed that one of the main concerns of several service providers who decided not to participate in the pilot is that extending free or discounted services to foreign persons with disabilities would be too costly. This concern would be valid under two assumptions: (i) persons with disabilities had a high level of participation in the targeted activities (culture, leisure, sport, tourism) also before the Card was introduced, (ii) service providers were not offering benefits to persons with disabilities prior to the Card. The first condition is not corroborated by official statistics²⁴⁰. With respect to the second condition, Figure 20 and Figure 21 below illustrate what types of benefits were offered to persons with disabilities and their personal assistants before and after the introduction of the Card. It can be noted that there was only a minor change in the package of benefits after the Card was introduced. Moreover, a third of service providers reported offering only minor discounts to Cardholders. Finally, service providers report that only a relatively small share of Cardholders access their services with a personal assistant, see Figure 22, usually less than 25%. Thus, the costs of offering free or discounted services also to the personal assistants are likely to be small.

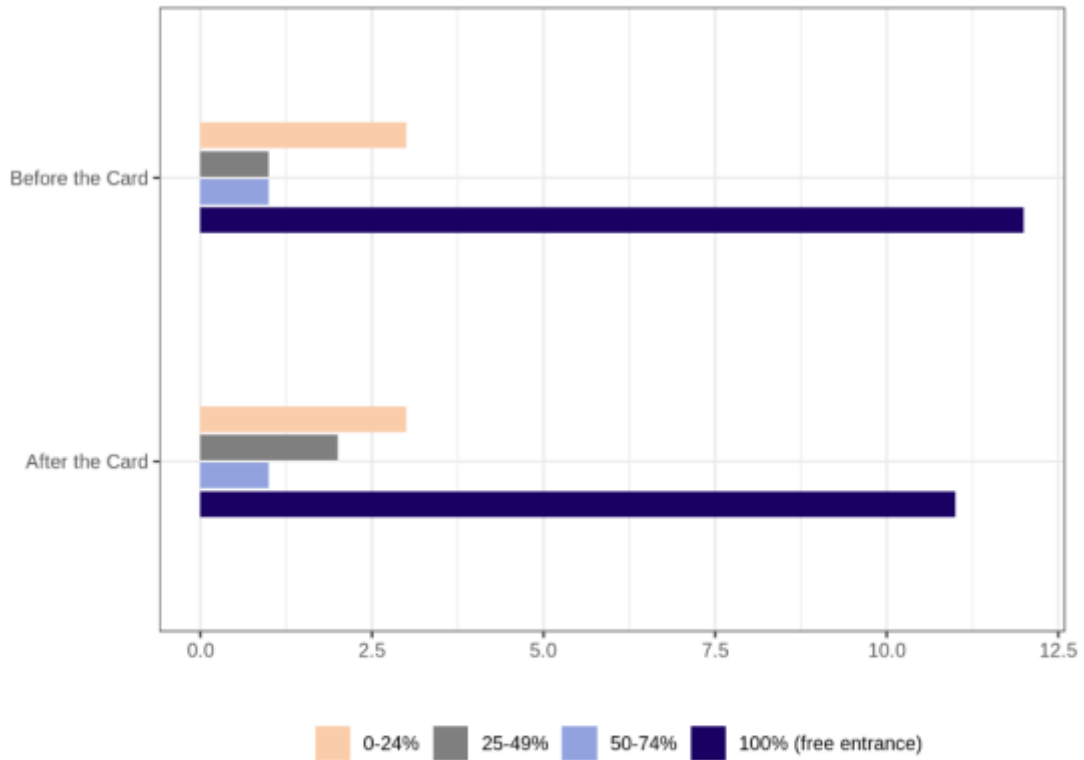
²⁴⁰ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability_statistics.

Figure 20 - Benefits offered to persons with disabilities, before and after the Card



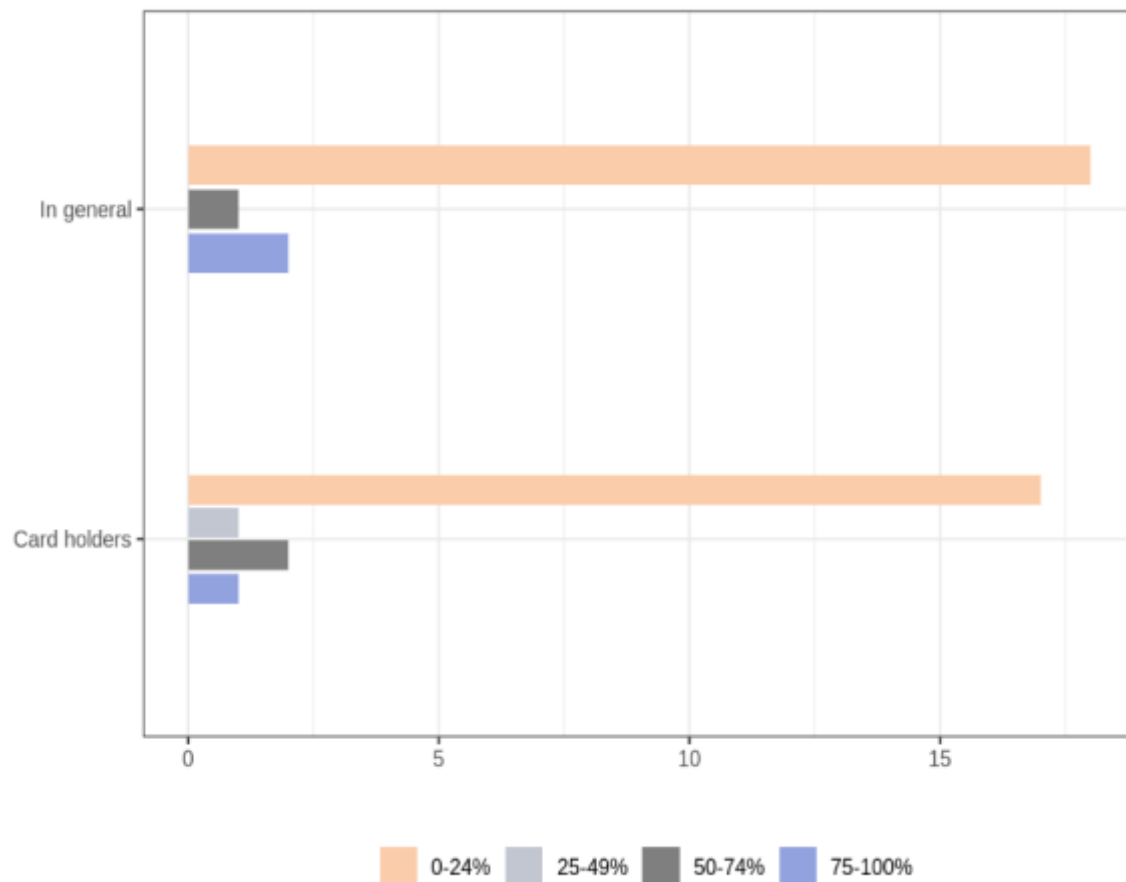
Source: Author's elaboration based on second round online survey, questions 39, 43-44

Figure 21 - Benefits offered to personal assistants of persons with disabilities



Source: Author's elaboration based on second round online survey, questions 41 and 46

Figure 22 - Estimated share of persons with disabilities with a personal assistant



Source: Author's elaboration based on second round online survey, questions 42 and 47

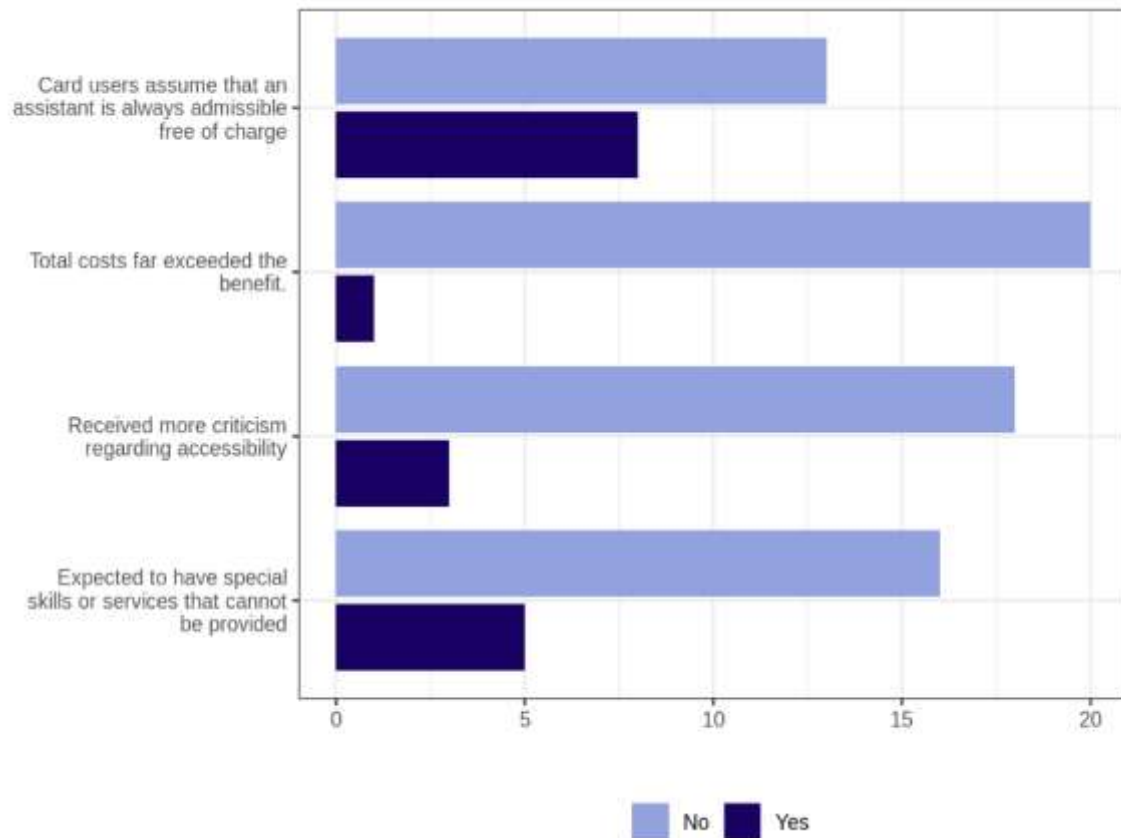
Among those using the service thanks to the Card and would not have done so without the Card, the cost of the discounted or free service cannot be considered as a foregone benefit to the service providers. While some costs may be incurred also due to increased use by Cardholders (e.g. the institution reaches temporary full capacity, due to the inflow of visitors with the Card, losing some paying customers), this is likely to remain at a minimum. Actually, if Cardholders are accompanied by additional paying visitors (e.g. friends, members of the family), who otherwise would not have used the services, then service providers may actually sell more tickets due to the Card. Consultation with service providers supports this hypothesis: 18 out of 21 service providers reported that Cardholders are joined on average by 1-2 visitors paying a full ticket. Only one service provider reported that Cardholders visit their premises without any additional paying customer. Additionally, if this category of Cardholder ends up partly paying for the ticket, which appears to be the case with many services (e.g. free entrances are not the norm), this represents additional revenue that the service providers would not have received if they had not joined the programme.

Costs of increasing the accessibility of services

About eight out of ten service providers reported having made improvements regarding the accessibility of their services. Less than one in four received public funding, either national or European, to make these changes and eight out of ten would have made additional changes with more funding specifically allocated. Despite national and EU accessibility obligations, not all service providers comply with it. It is possible that by participating in the programme, service providers may make accessibility changes

according to these regulations or additional regulations in order to provide better services and accommodate further requests of their customers with disabilities. As clearly shown in Figure 23 below, despite these costs, service providers perceive that the total costs do not exceed the benefits of participation in the programme. Only one in twenty reported otherwise.

Figure 23 - Concerns of service providers regarding participation in the Card's scheme

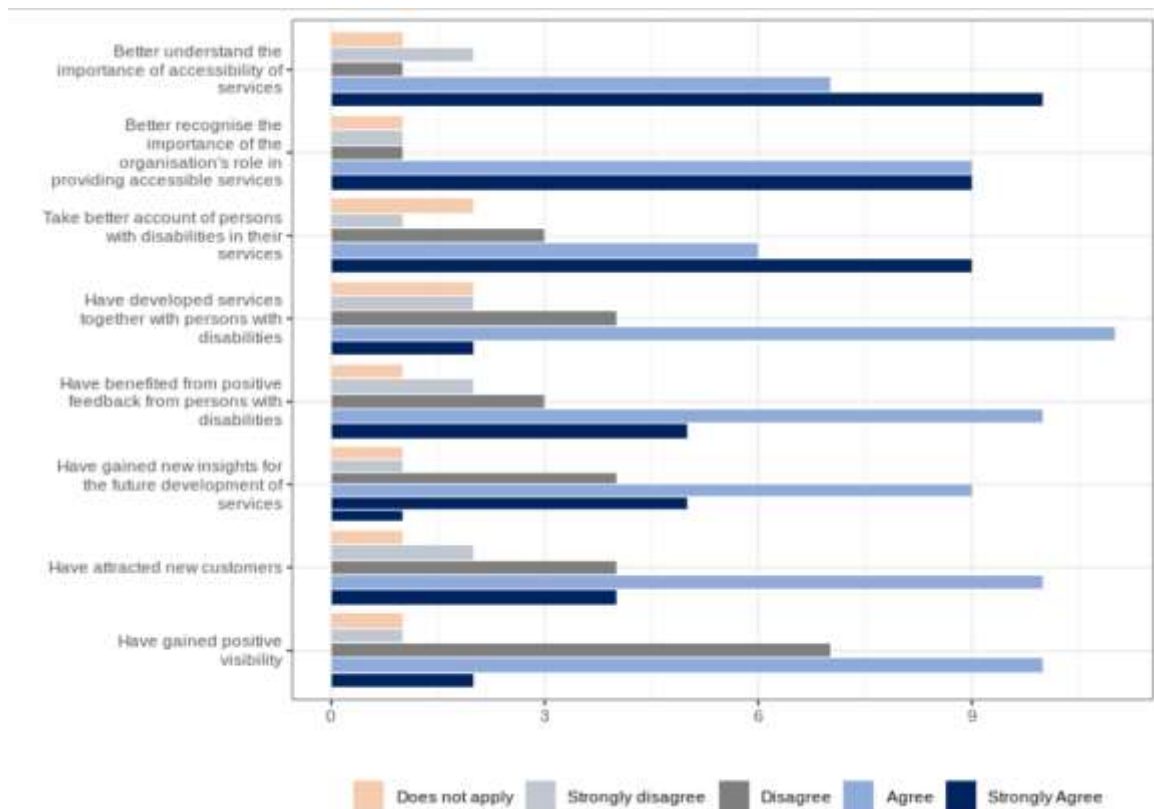


Source: Author's elaboration based on second round online survey, question 59

In addition to costs, it needs to be emphasized that service providers are likely to enjoy several other benefits from participating in the programme. First and foremost, service providers are likely to gain positive visibility and publicity, sending a message to the public that they are committed to social inclusion, by facilitating and accommodating the access of persons with disabilities in their premises. This may in turn attract new customers and potentially provide access to new funding opportunities. This claim is firmly supported by the survey results shown in Figure 24 below. More than half of the service providers “agree” or “strongly agree” that they gained positive visibility through the Card.

Furthermore, two thirds of service providers, a considerable share, state that they attracted new customers by joining the programme. Finally, the vast majority of service providers report that they improved their knowledge and values regarding accessibility and services with inputs from persons with disabilities. Qualitative anecdotal evidence from MT suggests that several service providers requested the services of the DCNO, also involving persons with disabilities, in order to help them improve accessibility. Some even hired persons with disabilities to provide special tours to Cardholders, thus contributing to improving also the employment opportunities for persons with disabilities.

Figure 24 - Positive effects on the service providers from participating in the pilot action



Source: Author's elaboration based on second round online survey, question 58

6.3. Relevance

Key findings

Finding 17 – A range of opinions were recorded on the capacity of benefits and services offered within the national Card's schemes to meet the needs of persons with disabilities: while the DCNOs and the civil society organisations were generally satisfied, persons with disabilities were less enthusiastic (EQ 7).

Finding 18 – Key issues that were seen as limiting the relevance of the Card include the limited accessibility of services, the limited coverage of the transport sector and limited number of participating Member States (EQ 8).

The assessment of the Card's relevance looks at the capacity of the Card to meet the needs of persons with disabilities in terms of:

- Quality of the services and benefits offered, i.e. whether the type of benefits offered are suitable;
- Quantity of the services and benefits offered, i.e. whether the number of benefits offered is sufficient.

Consultation with stakeholders elicited varying feedback on the appropriateness of the benefits offered. While stakeholders belonging to the same category (i.e. DCNOs, civil society organisations and persons with disabilities) provided convergent opinions, significant divergences emerged across different categories of stakeholders. Notably, the

DCNOs provided positive feedback both on the types of benefits²⁴¹ and the number of service providers²⁴² covered at the national level. Moreover, all the DCNOs reported that the Card increased the number of service providers offering benefits to persons with disabilities. However, the DCNOs highlighted that this is based on their own perception, with no data or statistics available to support their opinion. In BE, the DCNO reported that there is no planning for a monitoring system on the number of service providers participating in the Card system. According to the Belgian private entity responsible for printing the Card, a unique way for ensuring a monitoring system of the Card's use would be to have an electronic format of the Card that registers where the Card is used. By doing so, it would be possible to link the usage of the Card with the service provider where the Card is used²⁴³. In FI, despite having no available statistics at the national level, the DCNO conducted a survey addressed to persons with disabilities who confirmed that the number of service providers offering benefits to persons with disabilities had increased thanks to the introduction of the Card²⁴⁴. Yet persons with disabilities express less optimistic views: when asked "In your opinion, to what extent do current benefits/services provided by the EU Disability Card respond well to the needs of persons with disabilities in the different sectors?". In RO, BE, and CY, more than 50% answered "not at all" or "slightly", whereas in FI this rate is slightly below 50% and in MT around 30%. The sectors better covering their needs are, in decreasing order, culture, leisure, sport, public and private transport. Indeed, only 44.1% of Cardholders reported having applied because of the Card's benefits, whereas 61.7% applied because the Card is an official EU document certifying their impairment.

Table 31 - Number of service providers

MS Sectors	BE	CY	FI	MT	RO	SI	Total
Culture	168	44	100	6	162	102	582
Leisure	119	1	99	8	30	11	268
Sport	70	1	71		26	11	179
Transport - Public			10				10
Transport - Private		1	1	2			4
Other	117		2	12		92	223
Total	474	47	283	28	218	216	1266

Source: Author's elaboration based on national Card's websites

Looking at the coverage of the different sectors, see Table 32, overall less than 1% of the total private enterprises registered within the specific sectors are covered. The only exception is made by the cultural sector in BE, with 8.4% coverage.

Table 32 - Share of service providers per sector per Member State²⁴⁵

MS Sectors	BE	CY	FI	MT	RO	SI	Average coverage of each sector
Culture	8.40000	0.13333	0.13889	0.01304	0.04165	0.09533	1.47037

²⁴¹ Survey question 68: 6 DCNOs (BE, CY, EE, FI, MT, RO).

²⁴² Survey question 45: 6 DCNOs (BE, CY, FI, MT, RO, SI).

²⁴³ Focus group on the cooperation model in a multi-level administrative system.

²⁴⁴ KVPS conducted a survey targeting Card users. As of February 2020, 1000 Cardholders responded to the survey.

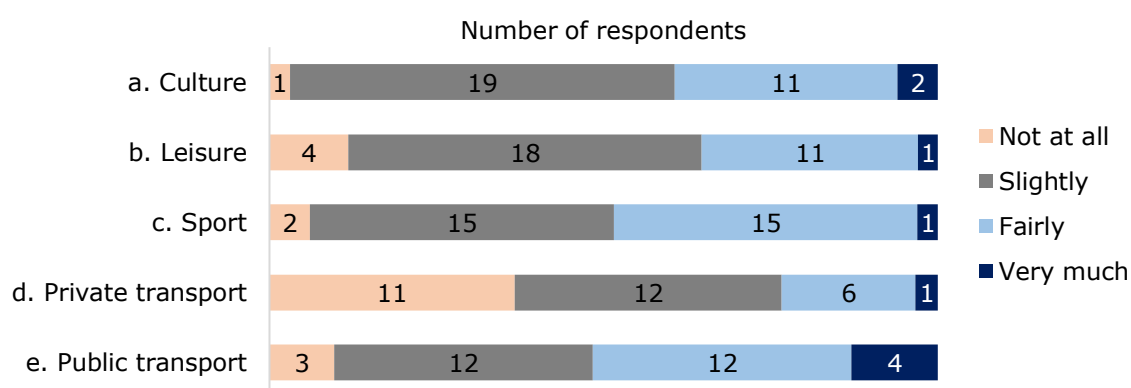
²⁴⁵ Information on total number of enterprises in the culture (NACE Rev. 2 code R91), leisure (R90), and sport (R93) sector has been retrieved from the Business Demography of Eurostat. See at: <https://bit.ly/31Lj4JU>. Information on total number of passenger transport enterprises has been retrieved from the Structural Business Statistics with NACE Rev.2

MS Sectors	BE	CY	FI	MT	RO	SI	Average coverage of each sector
Leisure	0.00141	0.000189	0.00147	0.00096	0.00041	0.00021	0.00077
Sport	0.00113	0.00012	0.00118	0.00000	0.00030	0.00045	0.00053
Transport – total	-	0.00008	0.00013	0.00250	-	-	0.00090
<i>Average coverage per MS</i>	2.80085	0.03343	0.03542	0.00413	0.01412	0.03200	

Source: Author's elaboration based on desk research

Civil society organisations report a general level of satisfaction as to the capacity of benefits and services provided by the Card to meet the needs of persons with disabilities (Figure 25)²⁴⁶.

Figure 25 – Opinion of CSOs on the capacity of benefits to meet actual needs



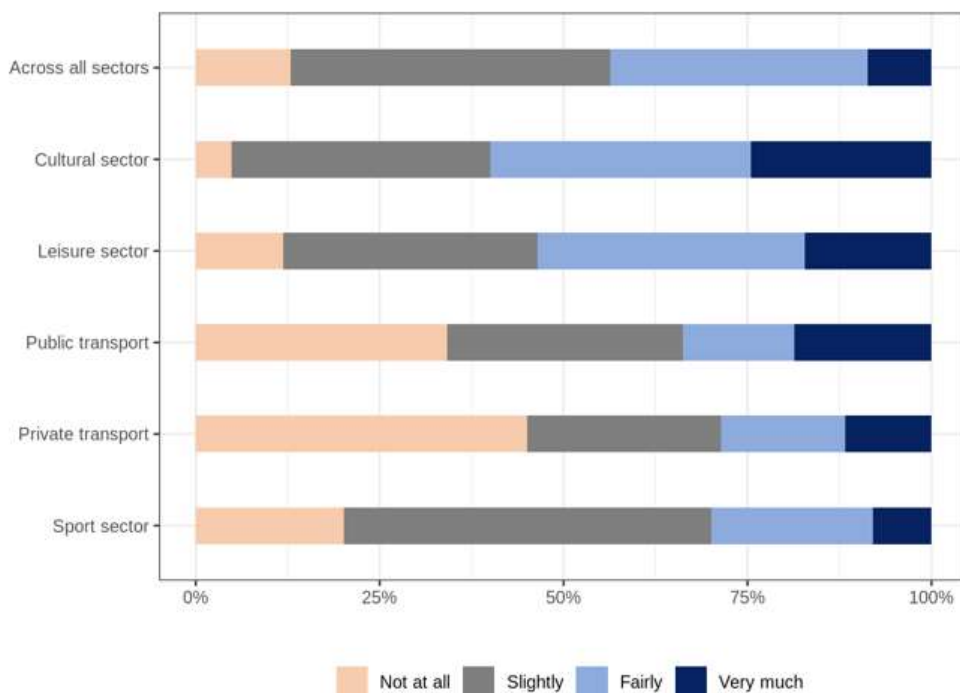
Source: Author's elaboration based on online survey, question 68

However, only half of the **persons with disabilities** responding to the online survey report that these benefits properly meet their needs (Figure 26).

codes H4910, H4931, H4932, H4939, H5010, H5030, and H5110. See at : https://ec.europa.eu/eurostat/web/products-datasets/-/sbs_na_1a_se_r2

²⁴⁶ Survey question 66: 28 CSOs (5 BE, 4 CY, 3 EE, 7 FI, 1 IT, 2 MT, 3 RO, 3 SI). It is important to mention that the overall number of respondents was quite limited (22 culture, 34 leisure, 33 sport, 30 private transport and 31 public transport).

Figure 26 - Opinion of persons with disabilities on the capacity of benefits to meet actual needs



Source: Author's elaboration based on second-round online survey, question 14-15

Some **issues** emerged as hampering the overall relevance of the Card²⁴⁷. Some stakeholders highlight that benefits covered by the Card should be accompanied by **measures improving the accessibility** of existing buildings²⁴⁸. Notably, 96.69% of Cardholders responding to the second-round survey believe that, in order to be more effective, the Card should be accompanied by measures aimed at increasing the service accessibility. The consumption of benefits for persons with disabilities is, in most cases, conditional on physical accessibility. This is particularly true for the transport sector, where several stakeholders from different countries identify an issue of accessibility. Hence, the involvement of a large number of service providers in the Card's scheme may yield no added value if this does not go hand in hand with the enhancement of facilities' physical accessibility²⁴⁹. With respect to the need for the provision of reasonable accommodation, 88.71% of Cardholders reported that it should be made compulsory as part of the Card, especially in the transport sector.

No information was provided on the reasons behind the limited accessibility of services across Member States, including any financial considerations related to the costs entailed by accessibility modifications. However, some evidence was found on the positive effect that the Card might have in prompting accessibility investments. In particular, three interviewees, both at the EU level and from different Member States, reported that the involvement of both service providers and persons with disabilities in the consultation and awareness-raising activities contributed to increasing the sensitivity of service providers to the needs of persons with disabilities²⁵⁰. According to these interviewees, the increased awareness of service providers might induce a change in the attitude of service providers towards the inclusion of persons with disabilities, incentivising them to implement specific

²⁴⁷ Survey question 67: 5 DCNOs (BE, CY, EE, MT, RO).

²⁴⁸ Interview with the European Disability Forum, ENAT, DCNOs of CY, FI and SI and CY CCOD.

²⁴⁹ Focus group on management of service providers across Member States.

²⁵⁰ Interview with the European Disability Forum and the DCNOs of CY and FI.

measures to increase the accessibility of their services. Over the long-term, this would lead to a positive externality, creating additional momentum beyond the Card's direct benefits for increased accessibility. Since services are offered at the national level, increasing their accessibility would benefit persons with disabilities within specific Member States at first. However, as an EU level interviewee affirmed, the process is likely to also increase cross-country mobility in the end, since persons with disabilities would have an incentive to travel to Member States with higher levels of service accessibility²⁵¹.

Moreover, **two European organisations raised concerns with respect to the voluntary coverage of the sectors in scope²⁵². The issue is particularly relevant for the transport sector that is perceived as crucial to ensuring the mobility of persons with disabilities. To this end, these stakeholders call for a uniform coverage of the sectors in scope across Member States, ensuring the transport sector is included in all national Card's schemes.** This concern was confirmed by most of the DCNOs who emphasised that cross-country mobility would benefit from the coverage of the transport sector in the Card's scheme of all Member States²⁵³ as well by the majority of respondents to the second-round survey (64.7%). Still with regard to the voluntary coverage of the sectors in scope, consultation with stakeholders provided some interesting input about possible factors incentivizing/hampering the overall participation of service providers in the Card's scheme.

Causal mechanisms supporting participation in the public transport sector

Some key mechanisms were identified as directly contributing towards the participation of public transport operators in the Card's scheme.

- **Political commitment:** regardless of the voluntary or mandatory nature of the participation of public transport operators, the coverage of the public transport sector is directly related to the political willingness of the institutional actors involved as well as to their level of commitment towards social inclusion of persons with disabilities.
- **Pre-existence of a public support scheme:** both countries where the public transport sector is covered already subsidised transport services at the national level, thus the public support scheme was used to cover the benefits and services offered under the Card's scheme.
- **Provision of timely and comprehensive information about the Card:** when public transport operators are not legally mandated and may voluntarily decide whether to participate in the Card's scheme. The active role played by the DCNO in raising awareness about the Card was pivotal. Indeed, this contributed to minimising possible resistance among transport operators and increasing their positive attitude towards the Card's objectives, thus, encouraging them to participate. In turn, this facilitated the DCNO in leveraging both financial and non-financial incentives, coupled with the pressure of a highly sensitised public opinion on social inclusion.

Source: Focus group on the public transport case

Similarly, the **voluntary participation** of Member States emerged as a further issue hampering the overall relevance of the Card across the EU²⁵⁴. The issue is particularly relevant for neighbouring countries, based on the following reasoning: the Card is aimed at boosting the cross-mobility of persons with disabilities; neighbouring countries are the first destination-choice of persons with disabilities since the geographical closeness is likely to make travelling easier and cheaper; therefore, **since neighbouring countries of current pilot Member States do not participate in the Card's scheme, the overall use of the Card is hampered.** It is interesting to note that the Member States surrounding BE (i.e. France, Germany, Luxembourg, Netherlands) did not participate in the Card pilot. The interest towards the Card by persons with disabilities is directly related to the possibility to use it in other Member States. For instance, many Belgians with disabilities applying for the Card in the German-speaking Community usually travel to Germany for cultural, sports and

²⁵¹ Interview with the European Disability Forum.

²⁵² Interview with the European Disability Forum and Disabled Peoples' International (DPI) – Europe.

²⁵³ Interviews with the DCNOs from CY and MT. Focus groups with the DCNOs and transport operators.

²⁵⁴ Interview with the European Disability Forum, ENAT and DCNO of BE.

leisure activities. Thus, the fact that DE does not participate in the Card system may **limit the interest of these persons to apply**²⁵⁵.

The DCNO from MT indicated an issue related to the **scope of the Card**, since only national public providers are involved in the national Card's scheme, whereas relevant services might be offered by private providers, raising the need for further involvement of service providers in the scheme.

Finally, still concerning the scope of the Card, it is worth mentioning the feedback from one service provider in the transport sector who highlighted the importance of extending the **field of application beyond the EU**, since travelling often implies moving long distances beyond the EU, thus persons with disabilities risk receiving benefits only up to the EU external borders, outside of which they are subject to other regulations and travel conditions²⁵⁶.

6.4. Coherence of the Card's implementation with relevant international and EU legislation

The EU Disability Card concerns the provision of services and benefits to persons with disabilities across the EU. The provision of services is one of the fundamental freedoms of EU law, thus it is a matter strongly regulated at the EU level. Hence, the assessment of the implementation of the Card cannot disregard an analysis of its coherence with the broader relevant EU legislative framework in place.

To this end, the following section presents an overview of the main legislative context of reference for non-discrimination in the EU with respect to the provision of services across Member States. Specifically, three main EU pieces of legislations have been considered:

1. The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD);
2. The Treaty on the Functioning of the European Union (TFEU)
3. The Services Directive (2006/123/EC)
4. The Geo-blocking Regulation (Regulation EU 2018/302)

The analysis aims at understanding the extent to which the Card is consistent with these pieces of legislation together with any possible implications in terms of social inclusion of persons with disabilities in the EU.

6.4.1. Analysis of relevant international and EU legislation

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

Key provisions relevant to the Card

²⁵⁵ Focus group on the cooperation model in a multi-level administrative system.

²⁵⁶ Focus group on transport: one service provider. Focus groups with persons with disabilities from MT.

- **Liberty of movement and nationality:** under **Art. 18** of the UNCRPD, States Parties shall grant persons with disabilities with the freedom to move, to choose their residence and nationality on an equal basis with other citizens.

Consistency with the Card

The Card is consistent with Art. 18 of the UNCRPD as its objective is to establish a voluntary system of mutual recognition of disability status among Member States and to promote equal access to disability-related benefits across borders for persons with disabilities.

In fact, the UNCRPD understands and addresses the risk of following State-individual models of disability in that this may prevent the universal application of the equality principle to persons with disabilities. It is clear in the Convention, in article 18, that the right to freedom of movement is a threshold right that is required to benefit from almost all other rights in the Convention, including the right to equality and non-discrimination. Consequently, the Card removes barriers to the cross-border mobility of persons with disability, thus, contributing to the application of the UNCRPD principle of liberty of movement and nationality.

Treaty on the Functioning of the European Union (TFEU)

Key provisions relevant to the Card

The TFEU establishes two main principles that are directly relevant for the Card.

- **Freedom to provide services:** under **Art. 56** of the Treaty on the Functioning of the European Union (TFEU), freedom to provide services entails the freedom to carry out an economic activity on a temporary basis in a Member State in which either the provider or the recipient is not established. Notably, Art. 56 TFEU prohibits restrictions on freedom to provide services within the Union against Member State nationals established in a Member State other than that of the person to whom the service is targeted. In order to fall under Art. 56 TFEU a provision of services must be characterised by:
 1. The inter-state element (the situation must not be wholly internal, i.e., the relevant elements of the service must present a linkage with at least two Member States);
 2. The commercial nature of the service (provided for remuneration);
 3. The temporary nature of the service provided (this differentiates freedom to provide services from freedom of establishment).
- **The principle of anti-discrimination:** the principle of anti-discrimination is enshrined in EU primary law. Notably, Arts. 8 and 10 TFEU embed a general requirement for the EU to combat discrimination based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation. In addition, Art. 18 TFEU, prohibits any discrimination on grounds of nationality within the scope of application of the Treaty. In turn, Art. 19 TFEU entrusts the EU to combat discrimination based on a range of grounds including, inter alia, disability. The principle of anti-discrimination is reiterated in the Charter of Fundamental Rights of the European Union, which shares the same legal value as EU Treaties (Art. 6.1 TFEU) and prohibits EU institutions and Member States from pursuing discrimination on any ground within the scope of EU law (Art. 21).

Consistency with the Card

- Art. 56: As established by EU case law²⁵⁷, the freedom to provide services also includes the freedom, for the recipients of services, to receive a service in another Member State without being obstructed by restrictions (p.2 (5) Services Directive)²⁵⁸. This extensive interpretation of freedom to provide services allows for the application of EU legislation on this matter to the EU Disability Card system, which is aimed at removing barriers from accessing services mainly in the areas of culture, leisure, sports and transport for EU citizens with disabilities. It should, however, be noted that Art. 56 of TFEU does not apply to transportation services, as laid down by Art. 58 TFEU. These are instead regulated by their own legislation, i.e., the special provisions of Title VI (Articles 90-100) of the TFEU. Therefore, the application of Art. 56 to the European Disability Card system remains limited to the fields of culture, leisure and sports.
- Arts. 8 and 10: The Card is perfectly in line with this legal framework as it is meant to establish a voluntary system of mutual recognition of disability status among Member States by ensuring equal access to disability-related benefits across borders. However, despite being aligned with the analysed legislation, the absence of mutual recognition of disability status determines differentiated treatment among persons with disabilities from diverse Member States. Hence, the application of the principles of non-discrimination and freedom of movement to persons with disabilities requires the implementation of a mutual recognition system of disability status at the EU level. However, this study does not provide thorough assessment of the feasibility of this scenario, including the role that the Card may play into this, neither in terms of national nor EU law.

Directive 2006/12/EC (“Bolkestein Directive”)

The “**Bolkestein Directive**” aims at removing barriers to the free movement of services between Member States so as to guarantee services’ recipients and providers the legal certainty necessary for the exercise in practice of the freedom to provide services. The Directive applies to all kinds of services. Its scope is negatively defined by setting a series of exclusions, inter alia:

- Transportation services are excluded from the scope of the Directive (Art. 2)²⁵⁹;
- Services of general economic interest (e.g. postal sector, electricity sector, gas sector) are excluded from the scope of the Directive (Art. 17).

Key provisions relevant to the Card

The Directive includes two relevant provisions for the Card:

- **Art. 16:** Member States shall respect the right of providers to provide services in a Member State other than that in which they are established. Member States shall not introduce requirements for the access or exercise of a service that are directly

²⁵⁷ Judgment of the Court of Justice of 31 January 1984, *Graziana Lusi and Giuseppe Carbone*, joined cases C-286/82 and C-26/83, ECLI:EU:C:1984:35; Judgment of the Court of Justice of 2 February 1989, *Ian William Cowan v Trésor public*, C-186/87, ECLI:EU:C:1989:47.

²⁵⁸ Craig, P., de Búrca, G., *EU Law: Text, Cases, and Materials, Sixth Edition*. Oxford University Press, 2015.

²⁵⁹ The transport sector is subject to extensive EU legislation, including passengers’ rights. Notably, under Title VI (Articles 90 to 100) of the TFEU, the transport sector is subject to harmonised rules concerning market integration and passenger rights in air, rail, road and maritime transport.

or indirectly discriminatory with regard to nationality (non-discrimination clause), unless the requirement is justified for reasons of public policy, public security, public health or the protection of the environment;

- **Art. 20:** Member States shall ensure that the general conditions of access to a service do not contain discriminatory provisions based on the nationality or place of residence of the recipient, but without precluding the possibility of providing for differences in the conditions of access where these are justified by objective criteria.

Consistency with the Card

According to the non-discrimination clause, persons with disabilities should be granted with the same services and benefits regardless of their nationality. However, in the absence of a mutual recognition of disability status at the EU level, service providers may not recognise a non-citizen as a person with disabilities. Thus, service providers may still refuse to extend a benefit offered to nationals with disabilities also to foreigners with disabilities. In case this occurs, persons with disabilities with different nationalities may be treated differently despite being in a similar situation (of disability). Although the service providers cannot be held liable for discriminating based on nationality, this case qualifies, *de facto*, as a violation of the principle of non-discrimination, raising a contradiction with the international legislative framework of reference. While, according to EU law, EU citizens without disabilities are granted the same benefits across Member States without any discriminations based on nationality, this is not the case for persons with disabilities. The latter may, in fact, still be discriminated as service providers may not recognise their disability status. This represents a potential obstacle towards the social inclusion and free movement of persons with disability within the EU. Therefore, the same considerations made in paragraph 0 on the fact that this report is not an impact assessment are valid here.

Regulation (EU) 2018/302 (“Geo-blocking regulation”)

The regulation aims to prevent discrimination based on customers' nationality, place of residence or place of establishment, including unjustified geo-blocking, in cross-border transactions between a trader and a customer relating to the sales of goods and the provision of services within the Union (Art. 1). To this end, it establishes that traders selling through online interfaces shall sell (but not deliver) goods and services to customers established in a different Member State at the same price and conditions offered to local customers. The scope of the Regulation is negatively defined through a series of exclusions, inter alia:

- Transport services are excluded from the scope of the Directive (Art. 1);
- Non-economic services of general interest are also excluded (Art. 1).

Key provisions relevant to the Card

The Regulation includes two relevant provisions for the EU Disability Card:

- Online traders selling goods and services in a Member State must not refuse a sale based on the consumer's nationality or location (Art. 3);
- Online traders shall not offer different terms and conditions to customers from other Member States, in particular when the customer seeks to receive services from a

trader, other than electronically supplied services, in a physical location within the territory of a Member State where the trader operates (Art. 4).

Consistency with the Card

The same considerations developed for the Service Directive apply also for the Geo-blocking Regulations, which expands the same provisions in the context of online transactions.

6.4.2. Consistency with the Card

In light of the above, three possible scenarios may occur:

a. Scenario 1 – State of art: the Card is adopted in eight Member States and the participation of service providers is voluntary

This scenario represents the current state of play. The Card as it is currently implemented gives rise to conflicts with both UN and EU relevant legislation, and notably:

- Voluntary nature of the service providers' participation: the service providers may decide whether or not to adhere to the Card. In case they decide not to adhere, they are allowed to provide their services and benefits to nationals with disabilities and not to persons with disabilities from other Member States.
- Limited extension of the Card to eight Member States: since only eight Member States participated in the pilot, service providers are allowed to provide their services and benefits only to persons with disabilities from the participating Member States and not to other Member States.
- The voluntary nature of both Member State and service provider participation raises possible discriminations in the provision of services to persons with disabilities from different Member States.

b. Scenario 2 - The Card is extended to all Member States and the participation of service providers is voluntary

In this scenario, just the first of the two conflicts raised under scenario 1 would persist. In case the Card is extended to all Member States, service providers adhering to it would recognise services and benefits for persons with disabilities from all Member States. However, service providers which decide not to adhere to the Card would still be allowed to recognise services and benefits only for nationals with disabilities.

The voluntary nature of service providers might still cause discrimination since different services might be offered to nationals and foreigners with disabilities. Hence, similar considerations as under scenario 1 apply here.

c. Scenario 3 - The Card is extended to all Member States and the participation of service providers is compulsory

In this scenario, the Card would become perfectly aligned with the non-discrimination principle. Both the conflicts raised under scenario 1 would no longer subsist. All services and benefits provided to persons with disabilities in one Member State would be automatically recognised for Cardholders from all other Member States. Under this scenario, the Card can act as an important EU law enforcement tool. In fact, by providing

for a system of mutual recognition of disability status, the Card would allow for avoiding that the situation in which service providers deny the provision of disability-related services to non-nationals with disabilities occurs. The same is for the conditions of provision of the services

6.4.3. Final remarks

The above analysis shows that only the third scenario ensures that all persons with disabilities are offered benefits and services without any discriminations based on nationality. As already mentioned, this would imply that the EU legislation related to services, above mentioned, apply to them in these circumstances. To this end, in the absence of a voluntarily mutual recognition of disability status by Member States, a possible step forward might be the identification of EU common minimum thresholds to recognise persons with disabilities that are eligible to receive the same services and benefits in the whole EU. In other words, the Commission should identify, based on inputs from the different Member States, essential level of services to be granted with the disability status within the culture, leisure and sport sectors. In this manner, the Commission would also contribute to the implementation of the European Pillar of Social Rights²⁶⁰, especially with respect to the right to equal treatment, opportunities and access to goods and services (Principle 3), the inclusion of persons with disabilities (Principle 17) and the right to access to essential services for all (Principle 20). This would not undermine the right of Member States to keep different national definitions of disability to regulate internal matters in the area of social insurance and social protection.

6.5. EU added value

The assessment of the added value brought by the Card compares the situation prior to (baseline) and after the introduction of the Card in pilot Member States/Europe. The baseline provides evidence that without the Card, each Member State defines benefits for national persons with disabilities and there are no measures in place for:

- The recognition of the disability status of non-nationals;
- The provisions of benefits in the sectors in scope to non-nationals.

Thus, the mutual recognition of disability status across Member States would not be ensured without the Card. With the Card, the rights of persons with disabilities are not only ensured at the national level, but also in all other participating Member States.

Furthermore, the Card proved to be an official document attesting the disability status of persons with disability. In particular, the rights of persons with disabilities are safeguarded as the Card ensures that:

- Persons with disabilities are not required to show medical documentation to prove their disability status;
- Service providers are easily informed about the status of the Cardholders.

Moreover, the format of the Card is unique and contains the EU logo. This allows the Card to be perceived as a trustworthy identification document by service providers, thus increasing its acceptance and recognition across the EU. Finally, the Card contributed to strengthening the relevance of disability-related matters within the EU policy agenda.

²⁶⁰ See at: https://ec.europa.eu/commission/publications/european-pillar-social-rights-booklet_en.

Notably, the establishment of national Card systems presented an opportunity to intensify national debates on disability policies and related issues as well as on the importance of a common EU disability policy. Consultation with stakeholders confirmed the willingness of national actors concerned with disability policies to strengthen cooperation across Member States for the identification of common solutions to common problems ²⁶¹.

²⁶¹ Focus group with the DCNOs.

7. Conclusions

7.1. Effectiveness

The assessment of effectiveness should take into account a two-fold level of analysis:

- The results expected from the implementation of the pilot project, as stated in the Call for Proposal for the Card²⁶²;
- The overall impact of the Card towards the social inclusion of persons with disabilities in the Member States where the Card was implemented.

Effectiveness of the pilot project

With respect to the first level of analysis, the pilot project proved to be effective as it achieved its overarching objective “to support the creation of a Card that will imply mutual recognition of the disability status in the participating Member States”²⁶³.

With the partial exception of the two Member States that have not issued the Card yet (EE, IT), all pilot countries developed a national Card system, and notably:

- All participating Member States established a national system dedicated to the implementation of the Card. In particular, they identified the respective DCNOs that are the key actors responsible for the introduction and functioning of the Card. The DCNOs represent national antennas in the area of disability: they showed themselves to be directly committed to the successful implementation of the Card and to ensure both (i) accountability towards the EU and (ii) financial sustainability of the Card in the long term;
- Consultations with persons with disabilities, dedicated civil society organisations and experts were carried out in all Member States, thereby supporting the definition of respective national packages of benefits and the identification of key needs to be addressed;
- In all Member States, awareness-raising activities were organised to disseminate information about the project among persons with disabilities and civil society organisations in the field of disability;
- National databases for the collection of data on eligible persons, beneficiaries and service providers were established in most Member States.

The main issues that emerged as hampering the implementation of the Card are:

- Two pilot Member States have not issued the Card yet: in EE and IT, the Card project was launched and the DCNOs were identified. The DCNOs also carried out some consultation activities to involve service providers and started designing the national package of benefits. However, mainly due to national political

²⁶² See at: <https://ec.europa.eu/social/main.jsp?catId=629&langId=en&callId=456&furtherCalls=yes>.

²⁶³ VP/2015/012, CALL FOR PROPOSALS to support national projects on a mutually recognised European Disability Card and associated benefits (<https://ec.europa.eu/social/main.jsp?catId=629&langId=en&callId=456&furtherCalls=yes>).

circumstances, the establishment of the national Card system was delayed, the service providers did not take part in the project and the Card was not issued.

One Member State did not manage to ensure the financial sustainability of the Card after the EU funding was over: in SI, the DCNO did not establish mechanisms to ensure financial sustainability in the long run.

Impact of the Card

As concerns the impact of the pilot action, both categories of stakeholders (Cardholders and service providers) generally reported a relatively modest increase in cultural, leisure and sport participation, and tourism abroad, due to the Card. While the situation is slightly better for culture and leisure, regarding sport, only a small share of Cardholders perceived any impact of the Card. The Card was not frequently used. In several Member States, about half of Cardholders reported never having used the Card in the previous year across each sector in scope. With respect to socio-economic characteristics, there appears to be a higher perceived impact among less educated and employed Cardholders. Unfortunately, among more vulnerable socio-economic groups (unemployed, inactive and retired) the perception of a positive impact is lower. At the level of Member States, generally Cardholders in FI and RO appear to perceive a higher impact and use the Card more. In spite of the less positive aspect, a vast majority of Cardholders would almost certainly recommend the Card to other persons with disabilities. While there is substantial room for improvement, overall Cardholders and service providers appear to support the initiative.

The main issues hindering the impact of the Card are the following:

- **Relatively modest perception** of an increase in cultural and sport participation, and tourism abroad from both categories of stakeholders: Cardholders and service providers. Concerning evidence suggests that this perception is even less positive among individuals who are unemployed, retired or out of the labour force, or students.
- **Low use of the Card**, especially in the sport and transport sectors. Even though the sport sector was included in all Member States, the use of the Card in this sector was extremely low (slightly higher in FI and RO).
- **Lack of monitoring of the Card's use by the service providers** thereby preventing to measure the real impact of the Card on persons with disabilities.
- **Low recognition of the Card by service providers**; even among participating service providers, the staff recognised with difficulty the Card.

7.2. Efficiency

The Card proved to be efficient considering that the implementation costs per Cardholder are low and are expected to become even lower due to economies of scale.

For service providers there is evidence that benefits clearly outweighed the costs: they attracted new customers, gained visibility, and improved their attitude towards disability. Indeed, eight out of ten interviewed service providers reported having made changes to improve the accessibility of their services since the introduction of the Card.

The following points of consideration emerged with respect to the overall efficiency of the Card:

- **National Card's websites:** some Member States reported no costs of updating the national website. However, as confirmed by consultation with some DCNOs, having a person responsible for the task is an important feature. Moreover, given that consistency in the structure of the Card's websites may be a desirable feature, ensuring its accessibility for all disabilities, the extension of the programme at EU level should consider contracting one provider with smaller production costs for all Member States.
- **Accessibility of services:** the majority of providers reported they would have made additional accessibility changes with more funding specifically allocated. Clearly, accessibility changes mandated by national and EU regulations should not be considered as part of the costs of the project. However, additional changes to provide reasonable accommodation to some categories of persons with disabilities are not mandated by law in some cases. Providing incentives to service providers to make such changes could be an integral part of the programme or should be targeted by other inclusion policies. Such improvements are likely to generate substantial additional benefits not only to Cardholders but to persons with disabilities in general over the short and long term.
- **Awareness campaigns:** in spite of having been quite costly, proved rather ineffective, given the low take-up rates in all Member States but MT. Thus, either more funds should be allocated towards this activity or more effective promoting strategies should be chosen, such as direct invitations by email or letter and social media campaigns.
- **Visibility of service providers:** the majority of service providers reported they gained positive visibility through the Card. This is likely to be further maximised in the future, if the Card is extended to the entire EU-27 and becomes more well-known. Creating a strong identity of the Card service provider, easily recognised by the general public, could incentivise additional service providers to join the programme. To this end, service providers should be encouraged to have at the entrance of their building a sign that identifies their participation in the Card initiative.

7.3. Relevance

The Card has shown to address the main needs of persons with disabilities in the sectors in scope as also confirmed by consultation with stakeholders. Moreover, the Card contributed to moving service providers closer to persons with disabilities and to increasing awareness of the needs of persons with disabilities. Overall, there is an increasing demand for the Card by persons with disabilities, further confirming the relevance of the Card²⁶⁴.

Some issues emerged that contributed to diminishing the overall relevance of the Card:

- **Limited accessibility of services:** the provision of benefits under the Card should be accompanied by specific measures aimed at increasing the accessibility of services to facilitate the participation of beneficiaries in society, thus incentivising them to use the Card;
- **Limited coverage of the transport sector:** the transport sector was covered only in a limited number of pilot Member States. In all these cases, the decision to include the transport sector in the national Card's scheme was a top-down government decision, confirming the high political sensitiveness around the transport sector.

²⁶⁴ The number of Card issued is increasing month by month. The number of the Cards issued provided by the DCNOs has been updated throughout the study.

Some stakeholders, and particularly civil society organisations, raised the need for including the transport within all the national Card's schemes in order to promote mobility of persons with disabilities;

- **Limited number of participating Member States:** most stakeholders mentioned the need to extend the Card to all Member States. In particular, it would be important to extend it to neighbouring countries of current pilot Member States that, due to their geographical proximity, are the primary foreign travel destination of persons with disabilities. Thus, their participation in the scheme is pivotal in ensuring the relevance of the Card as a tool for increasing cross-border mobility of disabled persons.

7.4. Coherence

The Card is coherent with the EU legislative framework of reference. Notably, according to EU legislation, service providers are obliged to provide the same benefits to all EU citizens, without unjustified discriminations based on nationality. Instead, participation of service providers in the Card's scheme is voluntary. This would imply a contradiction since service providers can voluntarily decide whether offering benefits only to nationals with disabilities or also to foreign persons with disabilities. However, the disability status is granted according to national provisions of law, with no definition of disability in place at the EU level. Yet, in the absence of a mutual recognition of disability status across Member States, in accordance with national legislation, service providers may not recognise a non-citizen as a person with disabilities. Thus, service providers may still refuse to extend a benefit offered to nationals with disabilities to foreigners with disabilities and without breaching the EU law. Therefore, the Card is consistent with the broad EU legislative framework of reference but, in the absence of mutual recognition of disability status, possible discriminations and contradictions with the international and EU relevant legislation may occur. Hence, this study is not an impact assessment and does not investigate how and to what extent mutual recognition could be established at the EU level in order to ensure full compliance with the principle of non-discrimination based on disability.

7.5. EU Added Value

The Card proved to be an instrument which brought considerable added value in the field of disability within the Member States participating in the Card's scheme. Moreover, it contributed towards the implementation of the European Disability Strategy 2010-2020. In particular, the Card was perceived as an enabler of the mutual recognition of disability status across Member States that would not have been feasible without the EC intervention. Notably, the Card had a:

- **Process effect:** the Card removes barriers to the cross-border mobility of persons with disability, thus contributing towards their social inclusion. In addition, the Card proved to be an EU official document attesting the disability status of persons with disability and ensuring that (i) persons with disabilities are not required to show medical documentation to prove their disability status and (ii) service providers are easily informed about the status of the Cardholders.
- **Role effect:** without the Card, each Member State defines benefits for national persons with disabilities and there are no measures in place for the recognition of the disability status of non-nationals and the provisions of benefits in the sectors in scope to non-nationals. Thus, the mutual recognition of disability status across Member States would not be ensured without the Card. With the Card, the rights of

persons with disabilities are not only ensured at the national level, but also in all other participating Member States.

- **Volume effect:** the volume effect depends on the extent to which the Card will be recognised across Member States. In case the Card is extended to all Member States and the participation of service providers is compulsory, all services and benefits provided to persons with disabilities in one Member State would be automatically recognised for persons with disabilities from all other Member States holders of the EU card. Under this scenario, the Card can act as an important EU law enforcement tool establishing a system of mutual recognition of disability status in the EU,

Hence, the study confirmed the EU added value of this instrument and the need to assess in detail the possibility of further EU legislative steps towards the Card’s extension to all Member States.

8. Recommendations

The study was strongly limited by the general lack of monitoring and administrative data available for assessing the impact of the Card insofar. This made necessary a wider consultation with stakeholders, including Cardholders, while developing a survey that could be re-used to evaluate the effect of the introduction of the Card in other Member States (see section 4.1.3). Despite being survey-data generally considered less reliable than administrative databases, the results from consultation with stakeholders showed a high level of convergence and consistency with regards to the need to extend the Card to all Member States and to make it obligatory rather than voluntary. Notably, **there is evidence that the overall relevance and added value of the Card are at risk if it continues to be in force in only a few Member States, since the mobility of persons with disabilities would continue to be significantly limited both:**

- Geographically: persons with disabilities can use the Card in only six Member States, undermining the EU dimension of the Card;
- Sectoral: sectors and benefits covered by the Card differ across Member States.

These considerations point to the importance of an EU Directive ensuring that the Card is adopted in all Member States based on a harmonised approach, both in terms of sectors covered and benefits offered. **The following recommendations are intended to be part of a possible Directive.** In particular, they present important suggestions to be taken into consideration in case an EU Directive is to be adopted. However, the feasibility of such a Directive should be carefully evaluated through an impact assessment specifically aimed at understanding the extent to which the Directive would be consistent and not in breach with other relevant EU pieces of legislations and national laws of Member States.

Table 33 - Issues and recommendations

Issue	Recommendation	
Member States adopting the Card should cover all the four sectors in scope		
Sectors covered across Member States are not homogeneous, particularly with respect to the transport sector that is covered in a very limited	Actions	<ul style="list-style-type: none"> • The Card’s adoption should be based on close consultations between relevant authorities, including the authority in charge of disability policies and the competent ministries of the sectors in scope. • The DCNO should inform all respective competent government ministries/departments (culture, leisure, sport and transport) about the introduction of the Card. • The competent ministries should notify the introduction of the Card to all relevant service providers in their areas of

Issue	Recommendation	
number of MS, reducing the overall effectiveness and relevance of the Card		competence. Internal communication tools within the specific institutions/ministries should be used (e.g. newsletters, mailing lists, etc.).
	Owner	<ul style="list-style-type: none"> Member States.
	Costs	<ul style="list-style-type: none"> No relevant additional costs since information sharing is likely to occur online.
	Risks	<ul style="list-style-type: none"> Member States might decide not to adopt the Card because they are not willing to cover specific sectors, e.g. transport.
	New policy steps	<ul style="list-style-type: none"> No additional policy/legislative steps.
Current good practices		<ul style="list-style-type: none"> FI and SI cover all the four sectors in scope.
Participation of service providers should be mandatory		
Sectors covered by the Card vary across Member States, particularly with respect to the transport sector that is covered in a very limited number of national Card's systems, reducing the overall effectiveness and relevance of the Card	Actions	<ul style="list-style-type: none"> Service providers offering benefits to nationals with disabilities prior to the Card's introduction should also offer the same benefits to foreign cardholders with disabilities. Public subsidies granted to service providers offering benefits to nationals with disabilities prior to the Card's introduction should be also extended to cover benefits provided to foreign Cardholders.
	Owner	<ul style="list-style-type: none"> Public and private service providers offering benefits and services to nationals with disabilities within participant Member States. Member States granting subsidies to service providers offering benefits to nationals with disabilities within participant Member States.
	Costs	<ul style="list-style-type: none"> Service providers who are not subsidised might incur additional costs due to potentially higher number of persons with disabilities to be covered. Public subsidies are likely to increase due to a potentially higher number of persons with disabilities to be covered.
	Risks	<ul style="list-style-type: none"> Service providers offering benefits to nationals with disabilities might find it not feasible to provide likewise the same benefits to foreigners with disabilities; thus, they might decide to end the provision of all benefits to persons with disabilities.
	New policy steps	<ul style="list-style-type: none"> No additional policy/legislative steps.
Current good practices		<ul style="list-style-type: none"> FI and SI enlarged their national subsidy schemes to cover the provision of benefits within the public transport sector to foreign Cardholders.
Service providers should follow and/or implement clear accessibility standards		
The accessibility of service providers is not fulfilled, the information about their offer is difficult to find, the Card is sometimes not recognised.	Actions	<ul style="list-style-type: none"> EC guidelines/legislation/standards/training should be offered to MS/national service providers on EU accessibility standards (i.e. European Accessibility Act and accessibility of the built environment), including accessible premises, offerings, and websites. National Law Enforcement Authorities should ensure that the services of service providers willing to join the Card's scheme are accessible in accordance with legal obligations, meaning access to the built environment, transport and information and communication including ICT and the services themselves. The websites of participant service providers should be accessible and include exhaustive/accessible/visually standardised information about: <ul style="list-style-type: none"> The accessibility standards ensured by the provider; The website should include at least the main EU languages and be readable by translation tools; The services and benefits offered; The procedural requirements when compulsory (e.g. need of booking, seat limits). Member States are encouraged to provide financial support to service providers to incentivise accessibility improvements. Participant service providers should ensure that their staff is properly trained to recognise and accept the Card.

Issue	Recommendation	
		<ul style="list-style-type: none"> Participant service providers should have a clear sign at the entrance of their premises, indicating their participation in the Card's scheme.
	Owner	<ul style="list-style-type: none"> Service providers.
	Costs	<ul style="list-style-type: none"> No additional costs since accessibility of services and products should be already ensured based on EU relevant legislation, including the European Accessibility Act (EAA) as well as as national legislation implemented to meet the UNCRPD's requirements. EC/service providers: costs entailed by the development and circularisation of guidelines/training.
	Risks	<ul style="list-style-type: none"> Service providers might remain be non-compliant with accessibility legislation in place; Service providers might be reluctant to receive accessibility training.
	New policy steps	<ul style="list-style-type: none"> The European Social Fund Plus, the European Regional Development Fund, and InvestEU should be mobilised to facilitate accessibility changes of the service providers in the sectors in scope and ensure full alignment of Member States with UN/EU accessibility legislation²⁶⁵.
	Observed good practices	<ul style="list-style-type: none"> In BE and FI many service providers' websites show pictures of their entrances with ramps as well as of their wheelchair-accessible toilets²⁶⁶; In MT, the Museum of Fine Arts asked the DCNO to support the design of a tour for visually impaired visitors. MT has required participating service providers to ensure the accessibility of their built environment and recommends the website's and services' accessibility. The DCNO sends a compliance team that assesses accessibility at the candidate service provider's premises, before including them in the Card initiative.
	The use of the Card should be regularly monitored at relevant levels	
No monitoring mechanism is in place to assess the use of the Card at the national level	Actions	<ul style="list-style-type: none"> The EC should provide the Member States with a standard format to collect monitoring data, including details on the categories of data to be covered (e.g. number of Cardholders using the service; number of additional visitors accompanying the Cardholder and paying full ticket; number of personal assistants using the service, etc.). The EC should develop an integrated online platform where all national monitoring data (GDPR compliant) are regularly uploaded. Service providers shall report (GDPR compliant) on the Card's use to the national competent authority on a regular basis based on the EC monitoring format. Three cases might occur: Service providers who receive public subsidies and are already required to monitor the services offered/users at their premises and to report to the public authority in order to get the subsidy. These service providers shall be required to specifically monitor also the use of the Card and report it to the competent authority based on the EC monitoring format. Service providers who receive public subsidies and are not required to monitor the services since they receive the subsidy <i>ex ante</i> based on state concession agreements. These service providers should be required to establish monitoring mechanisms to regularly inform the competent public authority about the Card's use based on the EC monitoring format. Service providers who do not receive any subsidies should be required to establish monitoring mechanisms to regularly inform the competent public authority about the Card's use based on the EC monitoring format.

²⁶⁵ See at: <https://ec.europa.eu/social/main.jsp?catId=1485&langId=en>.

²⁶⁶ See at: <https://ateneum.fi/welcome/?lang=en>, <https://www.finnkino.fi/en/fag>, <https://www.africamuseum.be/en/visit/plan>, <https://www.brussel museums.be/en/fag>.

Issue	Recommendation	
		<ul style="list-style-type: none"> Each competent ministry should be required to ensure that all service providers within its sector of competence comply with the monitoring requirements (GDPR compliant) and share all relevant data with the DCNO on a regular basis. This would provide for additional 'scientific' validity for measuring and assessing the Card's use effectiveness Each DCNO should upload national monitoring data onto the EC platform on a quarterly basis.
	Owner	<ul style="list-style-type: none"> Service providers.
	Costs	<ul style="list-style-type: none"> Service providers: fixed one-time costs entailed by the establishment of the monitoring system. Human resources allocated to regularly monitor the process and transmit data to the public authority.
	Risks	<ul style="list-style-type: none"> Service providers might decide not to offer benefits to persons with disabilities if they perceive the monitoring costs as too burdensome. Public incentives could be foreseen to mitigate their resistance.
	New policy steps	<ul style="list-style-type: none"> No new policy/legislative step, but a new online platform established at the EU level. No new policy/legislative step, monitoring mechanisms established at the service provider level.
	Current good practices	<ul style="list-style-type: none"> In SI, a monitoring system is in place in the railway sector, keeping track of the number of persons using the benefits offered. Upon monthly transmission of these data to the Ministry of Transport, the railway company receives refunds.
Consistency should be ensured in the provision of information about the Card		
The format and type of information included in the national Card's websites differ across Member States and are sometimes not consistent	Actions	<ul style="list-style-type: none"> The EC should provide a minimum/basic standard format to be followed when designing the Card's national websites, including clear requirements/details on the information to be included (e.g. list of participant service providers, list of services/benefits offered by each service provider, their website links/contact details, etc.) and accessibility standards to be followed by service providers. The national Card's websites should always provide information at least in the national language as well as in English and be readable by translation tools. Member States should be required to design their Card's national websites based on a common EC format. In extending the programme across the EU, the EC should consider contracting a single provider to develop the website's design template, so that navigation through national platforms is also consistent for Cardholders. The DCNOs should have regular meetings, held online and convened by the EC, to share information, good practices, solutions to the problems encountered.
	Owner	<ul style="list-style-type: none"> EC. Member States
	Costs	<ul style="list-style-type: none"> No significant additional costs. Less costs for the implementation of national websites.
	Risks	<ul style="list-style-type: none"> None
	New policy steps	<ul style="list-style-type: none"> None
	Current good practices	<ul style="list-style-type: none"> None

The evidence collected throughout this study raised some important inputs that might be worthy to be considered by new Member States willing to implement the Card. The following table provides an overview of the key milestones emerged per main activities entailed by the Card's design and implementation.

Table 34 – Takeaways for new Member States adopting the Card

Activity	How	Why
Set up of the DCNO	<ul style="list-style-type: none"> Centralised model: the DCNO should be an actor already dealing with national disability policies/matters, hence, with highly specialised expertise and thorough knowledge of national administrative/policy/political mechanisms. 	<ul style="list-style-type: none"> Having the DCNO at the central level allows for the coordination of all tasks related to the Card's implementation and functioning and to ensure consistency of the approach and overall cost-effectiveness. All pilot Member States set up the DCNO at the national level.
Set up the issuing authority	<ul style="list-style-type: none"> Centralised/local model: the issuing authority should be placed at the national or regional/local level according to the Member State administrative system 	<ul style="list-style-type: none"> In Member States with a centralised system, the identification of a single authority allows for a consistent approach and overall cost-effectiveness. All centralised Member States set up the issuing authority at the national level. In the case of multi-level administrative systems, the identification of regional issuing authorities besides the DCNO allows for a clear division/distribution of tasks along with financial commitment. The DCNO should still be identified at the central/federal level in order to ensure overall coordination and efficiency. Regional authorities are close to the territory and well-known at the local level, which might contribute to making the Card's application and use more user-friendly. In BE, there are five issuing authorities, including the DCNO and four regional authorities responsible for disability policies at the regional level.
Recruiting and management of service providers	<ul style="list-style-type: none"> Centralised/regional management: the recruitment and management of service providers should be under the responsibility of the authority(ies) already in charge of managing service providers outside the Card's scheme. The actor should be located at the national or regional/local level according to the Member State administrative system 	<ul style="list-style-type: none"> In the case of centralised Member States, the recruiting/management of service providers should be managed by the DCNO in order to ensure proper coverage of both sectors in scope and type of services offered, in line with the needs of persons with disabilities as identified at the national level. In all centralised pilot Member States, the DCNO is responsible for recruiting and managing service providers. In the case of federal/regional Member States, the recruiting/management of service providers should be in the hands of the authorities already in charge of managing service providers at the regional level outside of the Card's scheme. Regional authorities have a clear picture of the number and type of providers active in their regions of competence, thus, facilitating information-flows and a proper selection of service providers to involve in the Card's scheme. In BE, all five issuing authorities are in

Activity	How	Why
		<p>charge of recruiting/managing service providers in their regions of competence.</p>
<p>Consultation with CSOs/persons with disabilities</p>	<p>Timing of consultation: CSOs and persons with disabilities should be consulted starting at the inception stage of the Card's scheme.</p>	<p>Early consultation allows for:</p> <ul style="list-style-type: none"> • Alignment of the benefits package with the actual needs of persons with disabilities; • Increasing acceptance of the Card; • Avoiding conflict with the end users <p>The CY case shows that early and systematic consultation with DPOs enhances the relevance of the national package of benefits.</p>
<p>National website</p>	<ul style="list-style-type: none"> • Languages: all the main EU languages (should be available and the website should be readable by the main translation plugins) • Type of information: national Card's websites should include a full list of national service providers participating in the Card, their contact details, and benefits/services offered • Direct links with other national Card's websites 	<ul style="list-style-type: none"> • Provision of information in multiple languages allows EU residents from all Member States to visit the website • Advanced knowledge of the benefits supplied by each provider helps persons with disabilities to plan their travelling abroad • The direct links to other national Card's websites helps persons with disabilities to find information for planning their travel abroad <p>A good practice emerged in the RO case in terms of design of the national Card's website.</p>
<p>Application process</p>	<ul style="list-style-type: none"> • Online/paper based: persons with disabilities should be allowed to apply both online and through physical applications • Multi-access: persons with disabilities should be allowed to submit their application forms at different offices, including central and local offices. This is particularly relevant in case of federal/regional Member States 	<ul style="list-style-type: none"> • Allowing persons with disabilities to submit the application at an office near their home would incentivise them to apply. The BE case shows that having different regional/local offices where the application form can be picked-up contributes to making the application process easier and more user-friendly.
<p>Production</p>	<ul style="list-style-type: none"> • Outsourced/in-house: the Card's production should be outsourced to private entities when the DCNO does not have the high specialised and costly printing technologies internally or the devices needed to print the Card • Demand-based/pre-printed: pre-printing should be requested on demand since pre-printing only allows for cost-savings if the take-up rate is high. Otherwise, many Cards will be remained unused. • With/without Braille: Cards should be printed with Braille only for persons with visually impairments. • With/without security mechanisms: in printing the Card, the responsible authority should consider including security mechanisms, which can be costly, but reduce exposure to risks. 	<ul style="list-style-type: none"> • Printing Cards with holograms/other security mechanisms or in Braille requires specialised technology that is generally not available at most DCNOs, and most pilot Member States outsourced the Card's production. • In SI 170,000 Cards were printed and less than 8,000 issued. Similarly, the Cards produced in RO amounted to 50,000 while only around 30% of them were issued. • In MT, Cards with Braille were produced only for persons with visual impairments to save the overall costs. • Security mechanisms are important to avoid forgery.

Activity	How	Why
Provision of benefits	Coverage of the transport sector: all Member States should ensure participation of national transport operators, since the transport sector is pivotal to cross-border mobility	<ul style="list-style-type: none"> The Card's relevance is directly correlated with coverage of the transport sector. Before enjoying culture, leisure and sport service abroad, persons with disabilities have to travel to the other countries. As such, provision of services in the transport sector is a crucial condition for increased participation and cultural and sporting events and, hence, greater social inclusion.

Annexes

9. Country fiches

9.1. Belgium

Figure 27 – Key actors involved and activities performed

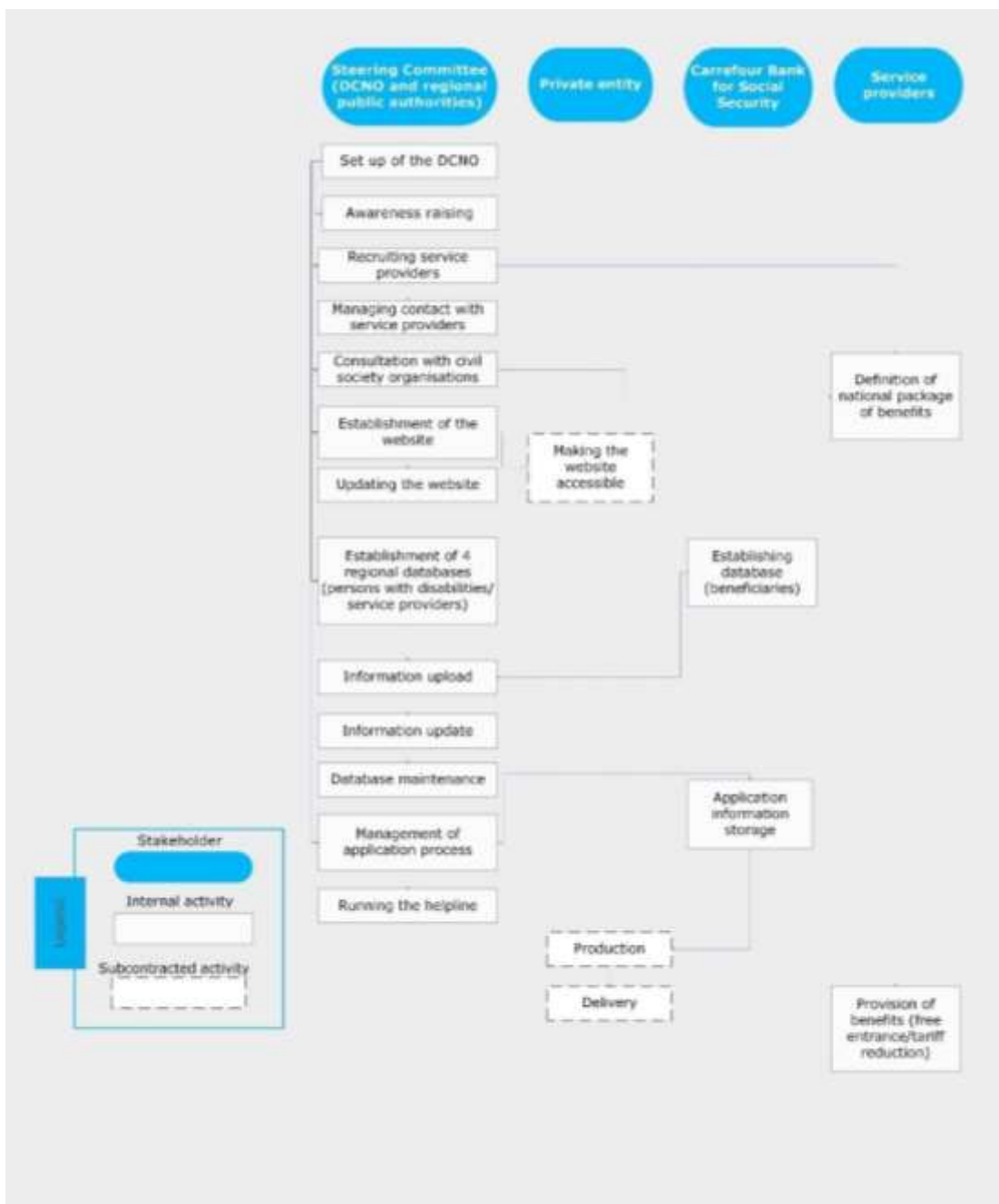


Table 35 - Country fiche: Belgium

Focus	Topic	Information
Legal and policy background	Definition of disability	Belgian legislation does not provide a single definition of disability at the national level ²⁶⁷ . Instead, regional pieces of legislation ²⁶⁸ establish different criteria to access disability allowances across the different regions, depending on the situation. However, in 2009 BE ratified the UNCRPD, which has become directly applicable throughout the country. This means that all newly adopted legislation must comply with the definition enshrined in the UNCRPD.
	Disability policies	In BE, disability policies are shared between the federal and the regional/community levels. Three main disability schemes are managed at the federal level by the National Institute for Health and Disability Insurance and the Federal Agency for Occupational Risks: i) the invalidity insurance scheme, ii) the scheme for accidents at work, and iii) the occupational diseases scheme. The benefits provided under these schemes are financed through direct workers' contributions. Additionally, the Federal Public Service (FPS) Social Security is in charge of the scheme for allowances for persons with disabilities, which does not require any direct contribution from taxpayers. Regions are competent for local policies such as urban development, accessibility of buildings, mobility, culture and tourism. Communities are competent in the field of education, professional training and welfare of persons with disabilities. Communities also grant contributions for technical aids and integrated education to persons with disabilities. Regions and communities both have competencies over policies in the field of youth welfare, also for policies related to children with disabilities.
Organisational setup	Legal basis	The implementation of the Card did not entail any new laws or regulations. The project started in February 2016.
	Governance scheme	A Steering Committee was created to coordinate the project upon signature of a cooperation protocol among the authorities in charge of disability policies both at the federal and the regional levels, namely the FPS Social Security, the <i>Agence pour une Vie de Qualité</i> (AViQ) in the Walloon Region, the Flemish Agency for Persons with Disabilities (VAPH) in Flanders, the <i>Service Public Francophone Bruxellois</i> (Service Phare) in Brussels-Capital Region, and Service for Independent Living (DSL) in the German-speaking community of Belgium. The DCNO is the federal authority, FPS Social Security, which plays a coordination role between the regional authorities who are each responsible for their geographical areas of competence. In addition, the Steering Committee identified the (BCSS) ²⁶⁹ as the body responsible for establishing an electronic network for data/information sharing between the authorities. All five members of the Steering Committee are issuing authorities. They were already responsible for issuing benefits to persons with disabilities pre-existing to those conferred with the implementation of the Card, hence they were identified as the most suitable authorities to issue the Card since beneficiaries are already familiar with them.
	Recruiting and managing service providers	Overall, more than 1,200 service providers in the field of culture, leisure and sport were consulted. Out of those, about 150 registered on the website in 2017 and approximately 250 in 2018. As of 2019, the website included 474 service providers participating in the Card's scheme ²⁷⁰ .

²⁶⁷ European Parliament, 2013, Country Report on Belgium for the Study on Member States' Policies for Children with Disabilities, available at: https://www.europarl.europa.eu/meetdocs/2014_2019/documents/libe/dv/25_becountryreport_/25_becountryreport_en.pdf.

²⁶⁸ See at: <https://handicap.belgium.be/fr/professionnels-medecins/legislation.htm>.

²⁶⁹ The BCSS mission is to support the security of information and the protection of privacy in the national social sector and to provide policy makers and researchers with integrated and cross-sectoral information to support policy decisions. See at: <https://www.ksz-bcss.fgov.be/fr/>; <https://www.ksz-bcss.fgov.be/fr/>.

²⁷⁰ These data were retrieved from the Card's national website.

Focus	Topic	Information
		<p>Service providers are recruited at the regional level in the sectors of culture, leisure and sport. The selection and recruiting of service providers were carried out by the Steering Committee in collaboration with the ministries of culture, sport and tourism at the regional level as well as in consultation with civil society organisations. Service providers notify the public authority of their participation via an online registration form illustrating the benefits/services provided to cardholders. Once recruited, service providers can register themselves online on the Card national website²⁷¹. Once this occurs the regional public authorities are responsible for managing contact with them through email.</p>
	Sustainability measures	<p>The five institutions signed an agreement for the funding of the Card system considering the share of each institution's obligations toward the population of persons with disabilities. The agreement was flexible in order to adjust the percentage of the funding for each institution over time. The existing collaboration and high level of trust among institutions was key in reaching such a mechanism for the sustainability of the Card in the long run.</p>
	National website	<p>The Card's national website²⁷² was established in-house by the DCNO. The guidelines and the format of the website were developed in collaboration with relevant civil society organisations. The website was developed in an accessible format. The accessibility of the website was outsourced to – and developed by - a private entity, AnySurfer²⁷³. The website includes information on the terms and conditions for obtaining the Card and on the benefits and services granted. The DCNO is responsible for regularly updating the website (from one up to three times per month) with new information, particularly regarding the list of participating service providers.</p>
	Consultation with stakeholders not directly involved in the Card's management	<p>Persons with disabilities were not consulted directly in defining the package of benefits to be covered by the Card. Consultations were organised with the civil society organisations representing persons with disabilities (e.g. the National High Council for Persons with a disability and the Belgian Disability Forum) and they reported their issues, requests, and responses. Public authorities were responsible for organising the consultations, which were mainly carried out through focus groups.</p> <p>Moreover, civil society organisations were involved by the Steering Committee to establish collaborations and partnerships with relevant service providers and to sensitise them to the needs of persons with disabilities. The DCNO was responsible for maintaining contacts with civil society organisations, which could announce their participation into the project by directly registering on the national website. Overall, civil society organisations participated in the communication campaigns regarding the Card.</p> <p>Academic experts and research institutes were not consulted in defining the package of benefits.</p>
Features of the system	Eligibility criteria	<p>Anyone who is entitled to disability status is eligible and can apply to the Card.</p> <p>The eligibility criteria to receive the Card correspond to the criteria set outside the Card's scheme to grant a person with disability status. The disability status is granted either by the FPS Social Security at federal level or by regional authorities responsible for disability policies at the regional level (VAPH, Phare, AViQ and DSL) according to their definition of disability. As a consequence, any person granted with disability status is recognised as a person with disabilities only by the institution (federal or regional) that made the assessment.</p> <p>Access to the Card is based on previous certificates and/or disability entitlements, therefore, no new assessment is required to obtain the Card.</p>
	Databases of persons with disabilities, beneficiaries and service providers	<p>There is no database established for all eligible persons, since different eligibility criteria apply in different regions. The regional issuing authorities already have databases containing individual information on persons entitled to disability status. Hence, information on eligible persons is stored within such databases.</p>

²⁷¹ See at: <https://eudisabilitycard.be/fr/pour-les-prestataires>; <https://eudisabilitycard.be/fr/pour-les-prestataires>.

²⁷² See at: <https://eudisabilitycard.be>.

²⁷³ AnySurfer is a Belgian organisation that promotes the accessibility of websites, apps, and digital documents for persons with disabilities. Full accessible websites obtain the "AnySurfer" quality label.

Focus	Topic	Information
		<p>There is a database of beneficiaries, which was established by CBSS and which is responsible for securing digital information and ensuring privacy protection. The CBSS functions as a technical operator hence, it manages the Card-register, checks the national registry for identification of the applicants and provides the necessary data to produce the Card. Information on the beneficiaries' database includes the national identification number, personal information, address, 'holder of the Card', the Card number, and the validity period of the Card. The CBSS is also responsible for uploading and updating information and maintaining the database.</p> <p>Databases of service providers have been established inhouse by the issuing authorities who are also in charge of uploading and updating the information as well as of the database maintenance. The database includes information on name, address and website of service providers without any reference to the type of benefit provided from each service provider.</p>
	Production	<p>The production of the Card was outsourced to a private company through a public procurement procedure. The initial agreement had a duration of three years with the possibility of extending the period of the contract. The private firm works with the CBSS, which provides access to the information on the Card applications. Each issuing authority is liable for the financial amount related to the production of the Card in its region of competence.</p> <p>The Card is personalised with personal information of the Cardholder, a photo, a unique Card number and the period of validity. The unit production costs per the Card amounted to € 0.14.</p>
	Application process	<p>The number of applications received (74,565) equals the number of cards issued between February 2016 and December 2019. The five issuing authorities are in charge of managing the applications they receive, and the procedures to gain the recognition for disability status vary across federal and regional institutions. To apply for the Card, persons with disabilities have to contact one of the regional issuing authorities or the DCNO, which came to be the main entry point for applications. In particular, persons with disability are required to submit their application to the authority, which owns their file on the recognition of disability or on the access to disability-related support. The ultimate issuing authority, carrying out the final controls, is the CBSS. In particular, the data registered by the institutions are sent through the regional Crossroad Banks to the federal CBSS where the data are stored in a unique database. The CBSS is responsible for validating the application by consulting the National Registry²⁷⁴ and then for sending the data to the private entity responsible for the production and delivery of the Card.</p> <p>The application process is possible through different means: online application, in person, by phone, and by mail. A helpline has been established inhouse by the DCNO.</p> <p>On average, the time between the submission of the application and the reception of the Card is one month.</p>
	Delivery	<p>The delivery of the Card is centralised and outsourced to the same entity in charge of producing the Card. Usually, Cards are delivered by post within one month from the date of application. Around 74,565 Cards were issued to meet demand between February 2016 and December 2019. The delivery of the Card is free to beneficiaries. In case of loss or stealing, beneficiaries can request only one duplicate.</p>
	Security mechanisms	<p>The respect of data protection rule is guaranteed and follows the national guidelines. In particular, the personal data stored in the database within the CBSS are the property of the institutions in the field of disability. The CBSS provides the mechanisms to check the data, and transfers only the data required by the private entity to print the Card. Moreover, data of beneficiaries remain online for six months and it is then stored offline for ten years.</p> <p>There is no mechanism ensuring the protection of data in case the Card is lost or stolen; all information used to personalise the Card is readable on the Card itself, and no microchip is used as a deterrent mechanism against thefts of the Cards.</p>
	National package of benefits	<p>The culture, leisure and sports sectors are covered in all the regions, while transport is not covered.</p> <p>Service providers decide which benefits to provide to beneficiaries of the Card. Such benefits may correspond to those that the service providers already offer to national citizens with disabilities or they may extend their benefit package. Service providers may also decide</p>

²⁷⁴ See at: <https://www.ibz.rn.fgov.be/fr/registre-national/>.

Focus	Topic	Information
	Problems encountered with the use of the Card	<p>whether to extend the benefits to the Assistant. Examples of benefits provided through the Card include free entrance, price reduction, audio guides and passes to avoid queuing. There is no comprehensive list of benefits offered by service providers.</p> <p>The main problem identified with the use of the Card is the low awareness of service providers. Cardholders sometimes face problems in receiving benefits from providers registered in the website because they may ask further proof of the disability status. The main reason for not accepting the Card relies in the fact that the staff of the organisation was not informed or trained on the Card. Moreover, service providers offer different benefits according to the level of disability of the person. The accessibility of services represents an issue for the Cardholders, which may impede their social participation and inclusion.</p> <p>Complaints are addressed to the individual organisation where the issue arises, there is no centralised system however Cardholders can refer to the regional authority. There are not any known cases of complaints by persons with disabilities from a country not participating to the Card project, who was refused any benefit/service because of lack of Cardholder status.</p> <p>A helpline was established. A global call centre on disability issues is provided by the (FPS) Social Security.</p>
Awareness-raising	Awareness-raising activities	<p>The Steering Committee collaborated with regional ministries (Ministry of Culture, Ministry of Sport, etc.) along with civil society organisations and local media to promote the Card. Moreover, health insurance funds and regional disability services informed persons with disabilities of the rights and advantages linked to the Card.</p> <p>Awareness-raising activities targeted cardholders, service providers, persons with disabilities as well as foreign beneficiaries. Such activities encompassed communication campaigns, social media campaigns, events, conferences, meetings, and press conferences. The communication tools leveraged included: brochures distributed in several languages, leaflets and posters, newsletters, journals, magazines, TV and radio messages, the national website, and blogs.</p> <p>The promotion of the Card was mainly based on:</p> <ul style="list-style-type: none"> • An information campaign for persons with disabilities, organised through the websites of the relevant public administrations, and through the publication of posters in four languages FR / NL / DE / EN), an information leaflet in four languages (FR / NL / DE / EN plus an easy-to-read version (FR / NL / DE / EN) and a brochure in braille (FR / NL). • A launching event ("kick-off") bringing together all the project's stakeholders, civil society and the press with the aim of ensuring dissemination. <p>Since the launch there were no further media campaigns or incentives to promote the Card.</p> <p>The awareness-raising campaigns and communication campaign were organised mainly from October 2017 until December 2017.</p>
Results	<p>Monitoring and evaluation activities</p> <p>Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events</p> <p>Social-economic benefits</p>	<p>The DCNO performed periodic surveys and collected aggregate statistical data. They collect monthly statistics on the Cards issued. An evaluation of the Card performed by the University of Leuven is underway²⁷⁵.</p> <p>All Cardholders participating in the second round of survey reported that additional accessibility changes are needed in order to make the Card more effective. Eight out of ten service providers reported that they made accessibility changes between 2016 and 2020. More than half of Cardholders perceived at least a slight increase in their cultural participation and tourism due to the Card. In contrast, regarding sport participation, close to 75% of them reported no improvement due to the Card.</p> <p>Card use was relatively limited, and slightly lower than the other Member States. Across all sectors, more than half of Cardholders in May 2020 reported never having used the Card in the previous 12 months. The need for transport benefits was strongly stressed. Among</p>

²⁷⁵ During the interview with the DCNO, it was agreed that results from the evaluation will be shared with the contractor as soon as available.

Focus	Topic	Information
		<p>the five Member States with sufficient data in the second round of survey in May 2020, BE fared the worst in terms of average likelihood of recommending the Card to other potential users with an average still relatively high of close to 7.5/10. Generally, service providers, who completed the second-round online survey in May 2020, reported that participating in the project impacted them positively: it helped them gain visibility, attract new customers, and develop more inclusive services. In addition, all service providers stated that the benefits of participating fully outweighed the costs. It is likely that service providers actually experienced an increase in revenues due to the Card.</p>
	National good practices	<p>The introduction of the Card contributed to increase and improve cooperation between public authorities concerned with disability policies both at the federal and the regional level. This was possible thanks to the information management system put in place for the Card. In order to simplify and harmonise procedures, a digital system was established to allow for the sharing of information and data between the five authorities involved in the Card system.</p> <p>Another good practice was the involvement of civil society organisations in the implementation of the Card that contributed towards the mainstreaming of disability in the fields of culture, leisure, and sport.</p>

9.2. Cyprus

Figure 28 - Key actors involved and activities performed

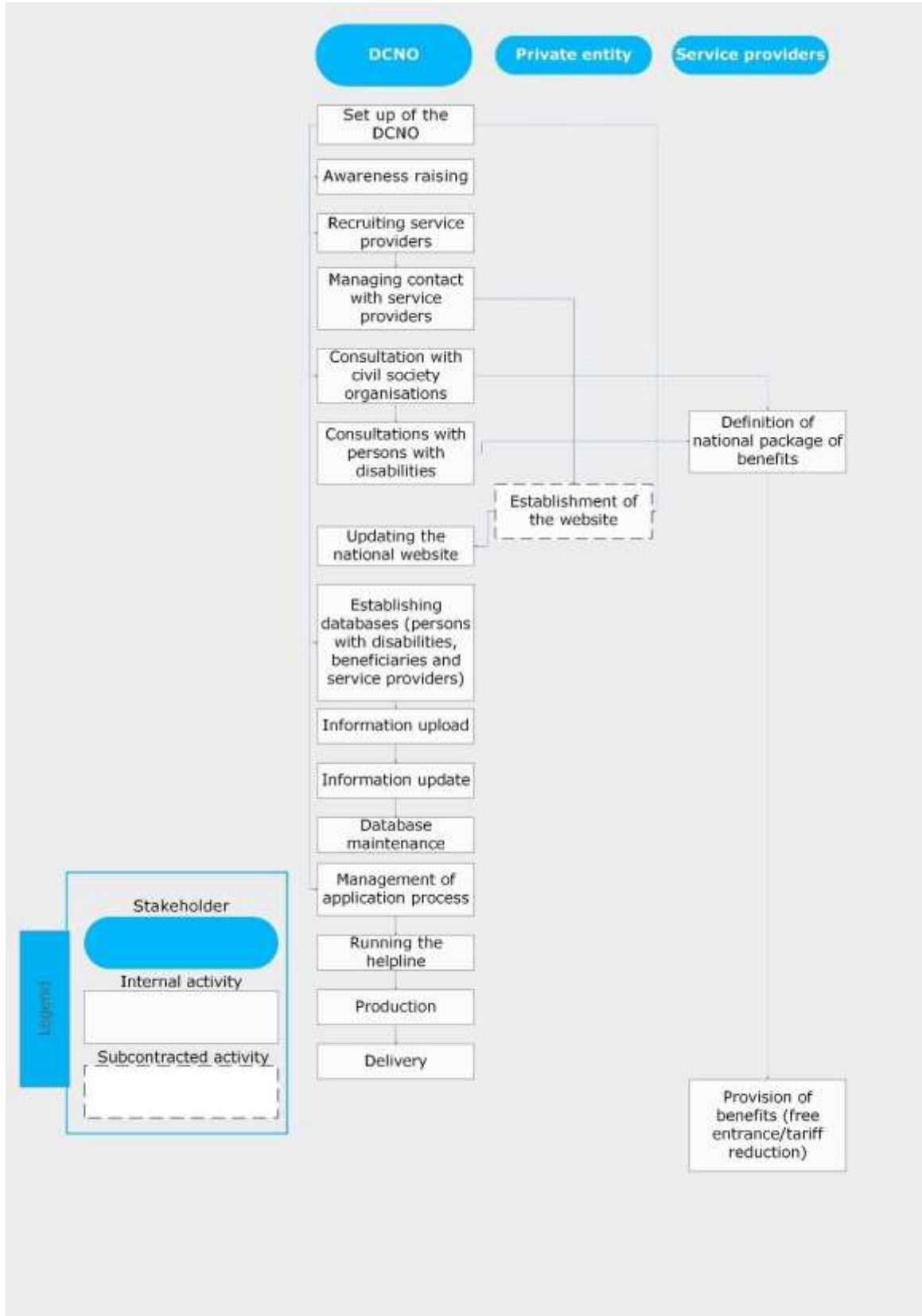


Table 36 - Country fiche: Cyprus

Focus	Topic	Information
Legal and policy background	Definition of disability	The definition of disability is that of the UNCRPD, which has been adopted as the national definition of disability. Accordingly, a 'person with disabilities' is defined as a person who has a long-term, physical, mental, intellectual or sensory impairment, which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others ²⁷⁶ .
	Disability policies	There is no National Disability Card. Instead, a Disabled Person Booklet was issued by the former Care Services for Persons with Disabilities until 2009 and by DSIPD from 2009 onwards. The booklet was issued by the DCNO based on a personal doctor's review/assessment and it was not used to grant much benefits but only a couple of those included in the Card. However, there was no official policy for binding specific providers. The booklet has stopped in 2017 with the onset of the Card.
Organisational set up	Legal basis	The Card entered into force on 15/02/2016. The Card is regulated under the provisions of the Budget Law of 2009, with the decision of the Council of Ministers no. 66.763 dated 6/2/2008.
	Governance scheme	The Card is managed at the national level. The DCNO is the DSIPD, the national authority in charge of disability policies. The DSIPD is under the Ministry of Welfare and Social Insurance and was established in 2009. The DCNO is the issuing authority.
	Recruiting and managing service providers	Overall, 47 service providers participate in the Card ²⁷⁷ . The DCNO is the authority responsible for recruiting service providers and managing contact with them. The DCNO works in cooperation with relevant ministries (e.g. the Ministry of transport is in charge of recruiting transport service providers). Each benefit to be covered by the Card is suggested by the competent ministry. The DCNO recruits the service providers individually. When the pilot was launched, consultation meetings with each service provider were organised. The service providers then notified the DCNO with a written list of the benefits they agreed to provide during the meetings. None of the contacted providers refused to adhere. However, there were concerns expressed by the Cyprus Football Organisation (CFO) regarding access of Cardholders to football games other than those of the national team. Decisions for those games are made by individual football clubs (FCs) and the Cyprus Football Organisation (CFO) is not in a position to commit to Card benefits on behalf of the other FC, or to persuade them to adhere. Hence, it is expected that the DCNO will soon contact individual Football Clubs (FCs) towards this aim. The DCNO planned to contact other service providers starting soon, including movie, theatres and individual sport clubs.
	Sustainability measures	The funding for the Card is public, at the national level. The DCNO is responsible for funding the Card. The funding of the system was included in the annual DSIPD budget coming from the Ministry of Welfare and Social Insurance. There is neither a separate budget nor a dedicated staff since the Card's implementation tasks have been integrated into the current workload at DSPID. It is interesting to note that, for the time being, all payments for producing and issuing the Card were covered by the pilot project's funding.

²⁷⁶ UNCRPD Art 1. See at: <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-1-purpose.html>.

²⁷⁷ Data retrieved from the Card's national website.

Focus	Topic	Information
	<p>National website</p> <p>Consultation with stakeholders not directly involved in the Card's management</p>	<p>The establishment of the Card national website²⁷⁸ was outsourced by the DCNO to a private company. The DCNO is in charge of updating and maintaining the national website.</p> <p>At the beginning of the pilot action, representatives of the national organisations concerned with disability – mainly umbrella organisations - were invited by the DCNO to several consultation meetings. The DCNO held 14 consultation meetings with the Cyprus Confederation of Organisations of the Disabled (CCOD) in which CCOD expressed its dissatisfaction with the submission of the EU proposal to co-finance the program without prior consensus of civil society organisations. During this phase, the consultation process faced significant friction between the DCNO and CCOD. Notably, CCOD argued that the decision of the Ministry and the DCNO to start the process of issuing the Card was single-sided and did not follow any prior consultation process with the Disabled People's Organisations (DPOs) as this is provided by the Procedure for Consulting Governmental and Other Services in Disability Laws of 2006 and the UNCRPD. Hence, CCOD suggested that the DCNO should have first consulted disability representatives before agreeing to the involvement of Cyprus (CY) in the Card project. The DCNO's response mentioned that decisions had not been made and the meeting aimed to inform all interested stakeholders about the benefits related to the Card and the intention of CY to adopt the Card's scheme. In response, CCOD insisted on the provisions of the Consultation Law (according to which, CCOD is considered partner of the State in all decisions relevant to disability issues) and requested all relevant information from DSIPD (correspondence between in Sept-Oct 2013).</p> <p>After this stage, a number of meetings took place in 2014 and 2015 between the two organisations, as well as with local authorities, service providers, private entities and organisations representing persons with disabilities. During these meetings, a number of suggestions were exchanged regarding:</p> <ul style="list-style-type: none"> • The definition of disability • Criticism of the medical approach to disability status adopted by the DCNO especially regarding disability assessment • Suggestions on possible benefits of the Card. <p>Some of this correspondence was also addressed to the Ministry of Labour, Welfare and Social Insurance, under which the DCNO operates. In 2017, CCOD informed the Ministry that they were still not satisfied with the progress and the way the DCNO managed the Card. One disagreement was related to the list of benefits that was considered too short and not beneficial for Cardholders, but DSIPD explained that it was just the beginning and further service providers can be added. Civil society organisation demanded free entrance for services instead of reductions, but the competent ministries, for instance the Ministry of Transport, responded they could not grant the service for free at that stage.</p> <p>In May-June 2017, the DCNO requested the written consent of CCOD to proceed with the implementation of the Card. However, no clear positive response was provided by CCOD.</p> <p>Public consultations at the beginning of the process were also addressed to persons with disabilities through the DCNO website. Finally, on 17 September 2019, CCOD requested feedback from the DCNO on the two years of implementation of the Card's scheme. No feedback is available yet.</p>
	Eligibility criteria	Overall, there were 2,110 beneficiaries between February 2016 and December 2019.

²⁷⁸ See at: <http://www.eudisabilitycard.gov.cy/en/page/home>.

Focus	Topic	Information
Features of the system		<p>The «Scheme for the EDC in CY»²⁷⁹ defines the Card's eligibility criteria, as well as the procedures and requirements for issuing the Card. The Card is granted only to persons with moderate to severe disabilities, with the idea of expanding later on to persons with mild disabilities.</p> <p>Eligible persons include:</p> <ul style="list-style-type: none"> • Cypriot and European citizens with disabilities who have a permanent residence in the area controlled by the Republic of Cyprus for at least 12 consecutive months. • Persons with disabilities with recognised refugee status or supplementary protection status, in accordance with the Refugee Law. • Eligible persons also include beneficiaries of the following benefits: a) severe motor disability allowance; b) care allowance for quadriplegic persons; c) care allowance for paraplegic persons; d) special allowance for blind persons; e) mobility allowance; f) allowance to persons with disability for the provision of a car; g) financial assistance for the purchase of a wheelchair; h) guaranteed minimum income. <p>A person ceases to be eligible when s/he does not meet the conditions of the scheme and in particular: when her/his condition has improved and no longer falls under the definition; when s/he has moved from the areas under the control of the Republic of Cyprus; or upon death.</p> <p>A new assessment is not required for persons with disabilities who already have a disability certification from the Disability Assessments Centres of the DSIPD. In case of persons who do not have any disability certification, an application has to be submitted to the DSPID, by completing the standard form, and providing the relevant certificates. Procedures and guidelines are not available in an easy-to-read or another accessible format. In any case, procedures are very simple, and the application process is clearly explained on the website as well as by responsible officers at the DCNO. DPOs often help their members with the application. The DSPID is responsible for assessing the eligibility criteria to receive the disability certification. The decision to accept or reject the application is made by the Director or by another authorised Officer at the DSIPD, following a brief disability assessment and interview by a Special Assessment Committee. The Committee shall consist of at least two doctors or other health and rehabilitation professionals with specialties related to the applicant's disability. The supervisor of the Disability Assessment Centre is responsible for the assessment. The Deputy Senior Social Inclusion Officer monitors the procedures of the three Disability Assessment Centres. The procedure takes about 1-1.5 months. Disability certification is provided through the assessment procedures of the New System for Assessment that was introduced in 2010 based on which applicants are assessed through a multi-disciplinary approach in terms of disability and functionality. Under this new approach, the assessment committee certifies the disability of a person and the eligibility for the Card. However, receipt of benefits requires an additional application specifically for the desired benefit, each with its own eligibility criteria, such that benefits are not directly provided unless beneficiaries of the booklet separately apply for them.</p>
	Databases of persons with disabilities, beneficiaries and service providers	Databases with information on eligible persons, beneficiaries, and service providers have been established in-house by the DCNO. Similarly, the updating, uploading of information, as well as the maintenance of the database are under the responsibility of the DCNO. The service provider's database includes information on service provider's details, contact person and benefits provided.
	Application process	The DCNO is responsible for managing the applications for the Card. Persons with disabilities submit the application at a physical office. The application for the Card is based on a standard form to be submitted together with the relevant certificates, including a personal photo. On average, the Card is issued two weeks after the application.

²⁷⁹ The aim of the Scheme is to encourage, improve and facilitate the mobility of persons with disabilities as well as to enhance their participation in the social, cultural and leisure sector of life by the issuing and provision of the "European Disability Card", which will allow access of persons with disabilities to benefits in the Member States participating in the specific European Program. See at: <http://www.eudisabilitycard.gov.cy/en/page/europaiki-karta-anapirias>.

Focus	Topic	Information
	Production	<p>A helpline supporting persons with disabilities to apply for the Card has been established in-house by the DCNO.</p> <p>To date, 5,000 Cards have been produced, corresponding to half of the number of estimated beneficiaries. Therefore, either the benefits are not attractive enough, or have not been advertised enough to make all beneficiaries aware of the Card. The Card is produced in-house by the DCNO which purchased the equipment for printing the Card. The procedure starts with the registration of the application by the Assistant Officer of the Disability Assessment Centre of the DSIPD in a computerised system that performs an automatic translation of the name and surname of the applicant from Greek to English. The Card has a standard format on which variable components (e.g. personal information) are added along with the braille dots though a special printer at the DCNO. Unit production costs for the Card amounted to €2.085.</p>
	Delivery	<p>To date, 2,110 Cards have been issued between February 2016 and December 2019.</p> <p>The DCNO is responsible for delivering the Card. Delivery is free of charge or the Card can be picked-up at the DCNO office rather than have it being sent by post to the beneficiary.</p>
	Security mechanisms	<p>The Card contains a microchip to prevent its unauthorised duplication and fraud. In case of loss, the beneficiary can submit the report to the police to receive a new Card.</p> <p>In terms of data protection, the Card is compliant with the GDPR and includes a special security code (the European Commission logo). Passwords to databases were established as mechanisms to ensure the protection of data contained within the databases.</p>
	National package of benefits	<p>The Card covers all the four sectors in scope. Given the lack of public transport providers in the country, the Card covers the private transport sector. Notably, the Card confers a 50% discount on the extra-urban and urban bus fares to persons with disabilities and their personal Assistants as well as priority seating. Cardholders also enjoy free entrance to listed museums and monuments. Free entrance is granted to the Cyprus Theatre Organisation (THOC) performances and reduced entrance for their personal Assistant. Access to other cinemas and theatres is under consultation. In the leisure and sport sectors, the Card provides free use of beach umbrella and sunbeds for up to 10% of the total number of beach sunbeds per arranged beach establishment, in addition to free or reduced entrance for persons with disabilities to municipal and village swimming pools (persons with disabilities have to contact the Municipal and Village Authorities prior to their arrival). Finally, free entrance to international and national championship sports events organised by the Cyprus Sport Organization is guaranteed for persons with disabilities and their personal assistants. However, football events are excluded. In case of severe physical and sensory disabilities, the DCNO may decide to extent benefits also to the assistant of the person with disability. In these cases, the Card is marked with an 'A' (assistant).</p>
	Problems encountered with the use of the Card	<p>Some providers, such as travel agencies, have reported on some misunderstandings on the Cardholder's behalf regarding what kind of benefits apply to their services.</p> <p>An in-house helpline was established to support applicants for the Card.</p> <p>In case of problems with the use of the Card, the Cardholder can submit a complaint to the Ombudsman (Independent mechanism for the promotion of the rights of people with disabilities), or to the DCNO. Complaints may also be submitted by DPO representatives. There are no known cases of complaints by persons with disabilities from a country not participating to the Card project, who was refused any benefit/service because of lack of Cardholder status.</p>
Awareness-raising	Awareness-raising activities	<p>Awareness-raising activities were meant to disseminate information among persons with disabilities. Such activities were carried out through the website of the DCNO as well as that of the DPOs. Brochures in multiple languages were distributed and press conferences were organised.</p> <p>The promotional activities were also carried out by public service networks. A network of partners including the DSIPD, other relevant public departments, local authorities and private entities was created for the promotion and implementation of the project.</p> <p>The main communication tools were TV, audio spot, advertisement, the website and blog, videos, newspapers, and magazines.</p>

Focus	Topic	Information
Results	Monitoring and evaluation activities	<p>Periodic surveys are performed to gather feedback on the implementation of the Card. An internal evaluation of the Card was performed by the DCNO in February/March 2020. The assessment of the survey results is still underway.</p>
	Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events	<p>Service providers participating in the second survey reported having made accessibility improvements to their services between 2016 and 2020. As for all Member States, Cardholders believe that there is still significant room for improvement regarding accessibility. Roughly two thirds of interviewed Cardholders in May 2020 perceived an increase in their cultural participation due to the Card. 40%-50% of them perceived an increase also in their sport participation and tourism abroad, respectively.</p>
	Social-economic benefits	<p>The Card was not used frequently. In May 2020, at least half of consulted Cardholders reported to have never used the Card in the previous 12 months for each sector in scope. Card use was highest in the culture sector. Service providers agreed that the Card had a positive effect on their institutions in all domains and that the costs were clearly offset by the benefits.</p>
	National good practices	<p>The set-up of the Card was based on a systematic consultation process between the DCNO and the Confederation of Disabled Person Organisations. The feedback received on the ground influenced the design and implementation of the Card at the national level. During the process, which lasted around three years, the organisations representing persons with disabilities at the national level raised significant disagreement with respect to the approach followed by the DCNO in designing the national Card system. Their concerns informed the Card's design and related package of benefits; thus, the Card's system strongly relied on the input provided by DPOs and persons with disabilities at the national level.</p>

9.3. Estonia

Figure 29 - Key actors involved and activities performed

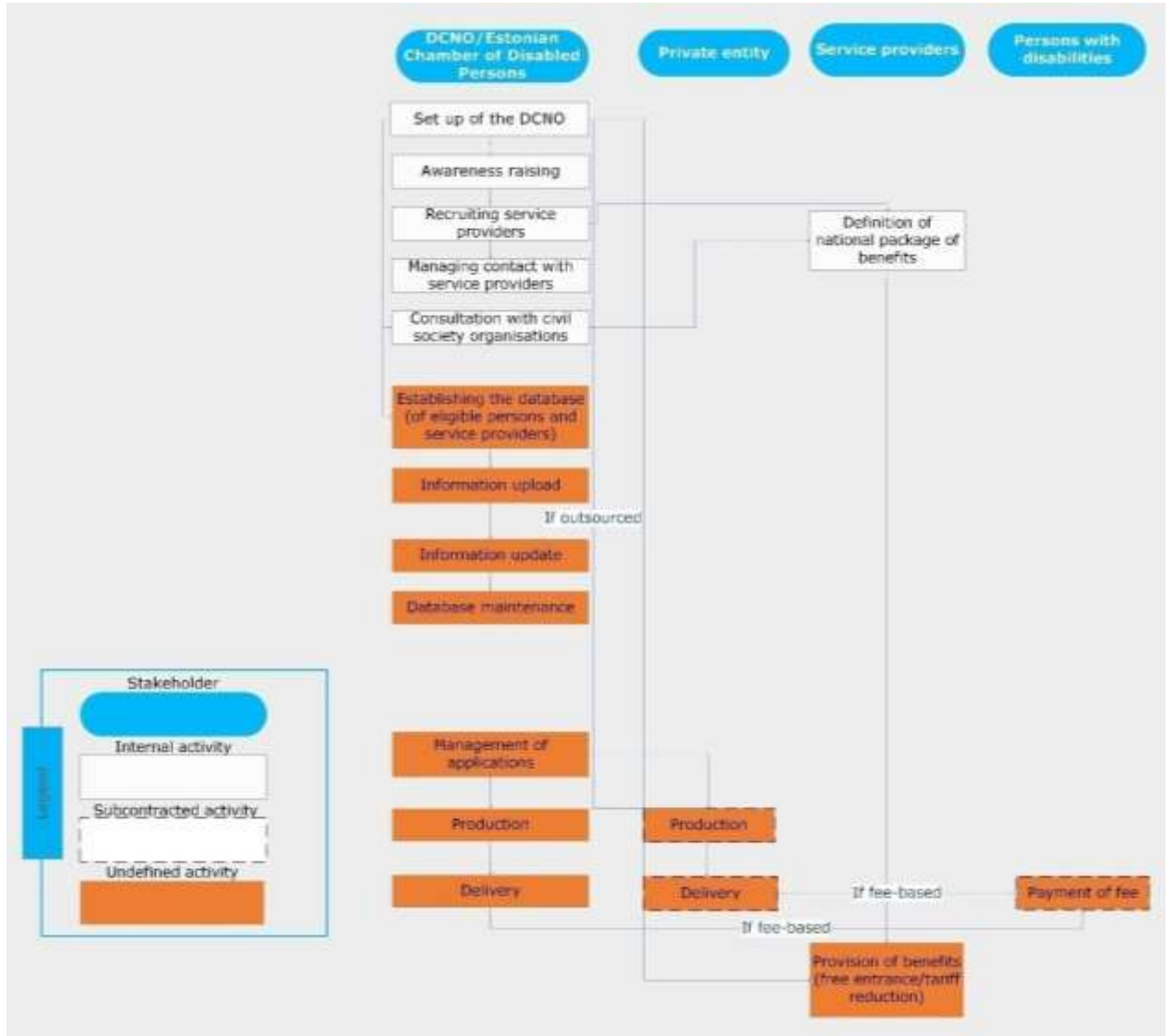


Table 37 – Country fiche: Estonia

Focus	Topic	Information
Legal and policy background	Definition of disability	<p>Under the national legislation²⁸⁰, disability is defined as the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person that, in conjunction with different relational and environmental restrictions, prevents participation in social life on equal bases with others. This definition of disability partly reflects that introduced by the UNCRP, which was ratified in Estonia in 2012. In fact, it adopts the “social model” of disability, understanding impairment as an obstacle for engaging in social life. On the other hand, the Estonian definition is not fully aligned with the UN definition as it does not acknowledge the long-term dimension of disability.</p> <p>In case of severe, profound or moderate degree of disability of children of up to 16 years of age and persons of retirement age, their need for personal assistance, guidance or supervision is recognised.</p> <p>The national legislation refers to the following definitions of profound, severe, and moderate disability:</p> <ul style="list-style-type: none"> • Profound disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs constant personal assistance, guidance or supervision twenty-four hours a day; • Severe disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs personal assistance, guidance or supervision in every twenty-four-hour period; • Moderate disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs regular personal assistance or guidance outside his or her residence at least once a week.
	Disability policies	<p>A National Disability Card is in place and covers the following benefits:</p> <ul style="list-style-type: none"> • Culture: free entrance, price reduction • Leisure: price reduction • Sport: free entrance, price reduction • Public transport: free of charge.
Organisational set up	Legal basis	<p>At the national level, even though no new legislation is in place yet, the Card is expected to be regulated under the "Social Benefits for Disabled Persons Act" and the Regulation 11/11/2016 n. 61 "Disabled person's card - information and issuing procedures" of the Ministry of Social Affairs.</p> <p>The Card has not been issued yet in Estonia (EE). According to the Ministry of Social Affairs and the Estonian Social Insurance Board (i.e. the national authority responsible for defining the disability status and for issuing the National Disability Card), there is political willingness to issue the Card in EE. However, decisions about the date and other important features have not been made yet.</p> <p>The DCNO is the Estonian Social Insurance Board.</p>
	Governance scheme	<p>The Estonian Social Insurance Board is the DCNO.</p> <p>Even though specific roles and implementing tasks have not been defined yet, the implementation of the Card is expected to be based on cooperation between the DCNO, the Ministry of Social Affairs who is in charge of disability policies at the national level, the Estonian Chamber of Disabled People (non-governmental national coalition of patient organisations from the regional and national level), the Estonian Unemployment Insurance Fund, the Estonian Ministry of Economy and Communication, the Estonian Ministry of Culture, the Equal Treatment Ombudsman office, local authorities and local organisations of people with disabilities.</p> <p>The Estonian Social Insurance Board is expected to be the issuing authority.</p>
	Recruiting and managing service providers	<p>The Estonian Chamber of Disabled People is the body responsible for recruiting service providers and managing contact with them. Contact with service providers occurs through emails, phone calls, Skype conferences, and in-person meetings.</p>

²⁸⁰ See at: <https://www.riigiteataja.ee/en/eli/ee/514112013021/consolide/current>

Focus	Topic	Information
	Sustainability measures	The State should finance the Card project and the DCNO is responsible for the management of the funding of the activities related to the Card production and delivery. There is no agreement on the body responsible for funding the activities related to the management of service providers, the development of the national Card's website and the awareness-raising activities for issuing the Card in 2021. The DCNO submitted a request for funding from the state budget, but the funds have not been identified yet, and there is no information on the timeline.
	National website	The Card's national website has yet to be set up. The Estonian Chamber of Disabled Persons established a website (https://www.epikoda.ee/soodustused) in 2017 when the Card pilot project took place in Estonia. However, this website is not the EU Disability Card's website and the available information is not updated ²⁸¹ .
	Consultation with stakeholders not directly involved in the Card's management	Disability organisations were involved to help understand the needs of persons with disabilities as well as the key services and benefits to be covered with the Card. Consultations were organised with different stakeholders, including with national and local authorities, service providers - museums, theatres, concert organisers and unions of persons with disabilities. Consultations with DPOs were also aimed at mapping and gathering information on how many of the target groups have experience travelling across the EU and have claimed discounts as well as what kind of problems they have encountered.
Features of the system	Eligibility criteria	The eligibility criteria to receive the Card have not been adopted yet. However, the criteria to receive the Card are expected to be wider than those used to issue the National Disability Card. All persons who have a degree of disability can apply to the Card, not just those with profound/severe disabilities. The DCNO is expected to be responsible for assessing the eligibility criteria. In 2017, the number of persons with disabilities was estimated at 158.000. Out of these, 38% have medium-level disability, 52% have severe disability, and 10% have profound disability according to the definitions on the severity of disabilities established in the Social Benefits for Disabled Persons Act ²⁸² .
	Databases of persons with disabilities, beneficiaries and service providers	A database of eligible persons was established internally by the Estonian Social Insurance Board. Updating and uploading information, as well as the maintenance of the database are under the responsibility of the Estonian Social Insurance Board. The Estonian Chamber of Disabled People is expected to establish and upload a database of service providers.
	Production	It has not been agreed yet whether the production of the Card will be in-house or outsourced. In case the production will be outsourced, it is expected that the private entity will be selected by a public procurement.
	Application process	The application process for the Card has not been decided yet. Persons with disabilities will likely be able to submit a single application for identification of their disability status as well as to request the National and EU Disability Card. Otherwise, applicants will be required to submit a separate application for the Card. Submission of the application for the Card is expected to be online.
	Delivery	The national postal service will probably be responsible for the Card's delivery since it is already in charge of delivering the National Disability Card. The Card will probably be fee-based, in order to cover the processing costs. Moreover, the fee is expected to dissuade people who do not actually need the Card from applying for one.
	Security mechanisms	-
	National package of benefits	The benefits expected to be provided by the Card in the field of culture, leisure and sport are the same as those covered by the National Disability Card. The Card will not include the transport sector.
	Problems encountered with the use of the Card	-

²⁸¹ According to the EE DCNO, a request for funding from the state budget was submitted by the DCNO, but the funds have not been identified yet, and there is no information available on the timeline. In the absence of this additional budget, the DCNO does not have the necessary internal resources to cover key implementation tasks, including the development of the national database.

²⁸² See at: <https://www.riigiteataja.ee/en/eli/ee/509012015003/consolide>.

Focus	Topic	Information
Awareness-raising	Awareness-raising activities	<p>Preliminary awareness-raising events were carried out during the pilot project. These included:</p> <ul style="list-style-type: none"> • A conference organised on the occasion of the European Day of Persons with Disabilities. The conference was attended by over 200 participants, including the ministries of culture and social affairs, state authorities, foreign guests, local municipalities, service providers and unions of persons with disabilities. • The webpage of the Estonian Chamber of Disabled People, its magazine "With you" (Estonian: Sinuga) and social media. The new accessible website provides information to persons with disabilities in EE and abroad. Furthermore, a number of informative printouts and a video are now available for awareness raising and publicity. <p>Awareness raising activities were carried out only in the period of the pilot project (2016-2017). There have been no further awareness campaigns since 2017.</p>

9.4. Finland

Figure 30 - Key actors involved and activities performed

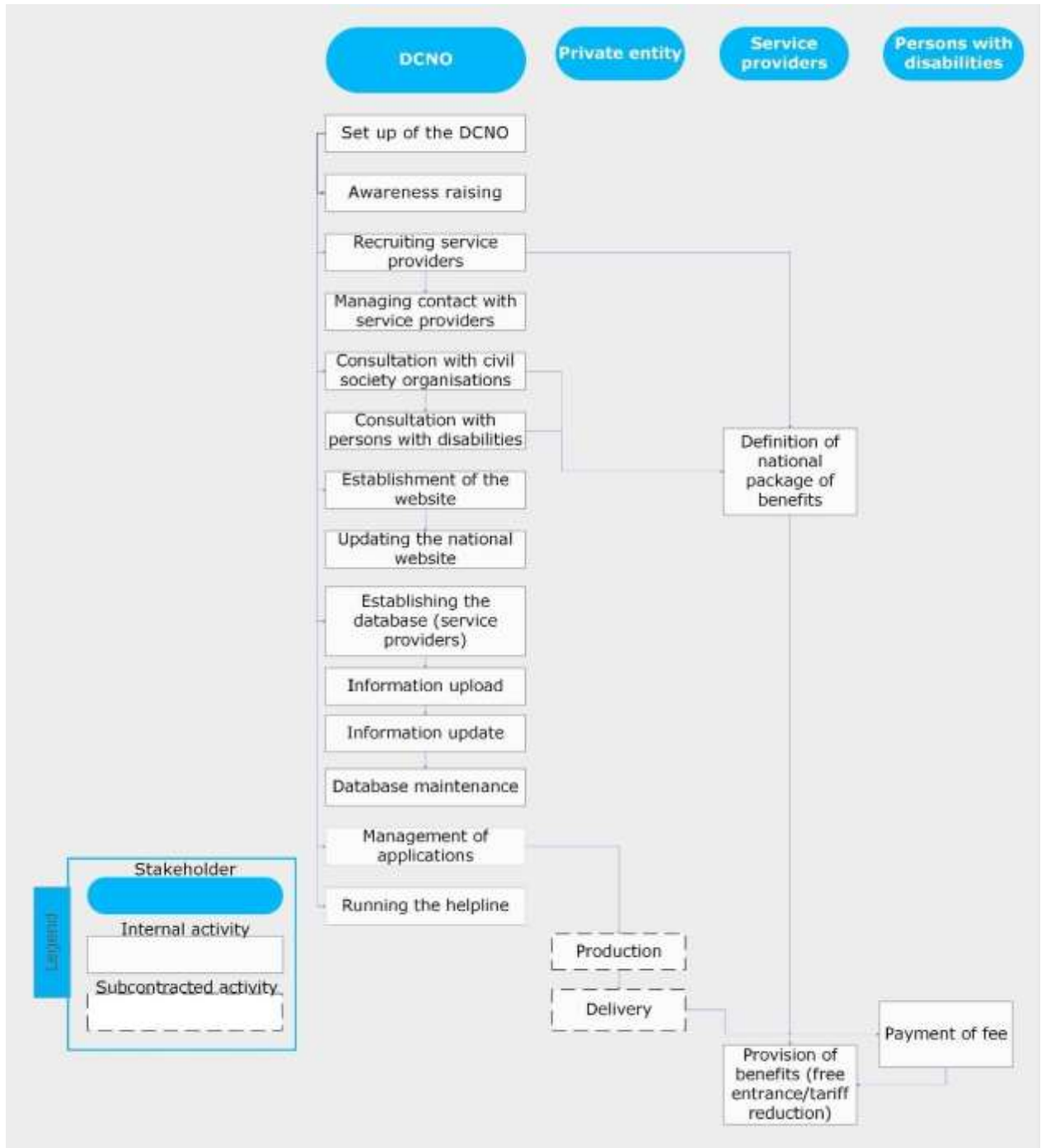


Table 38 - Country fiche: Finland

Focus	Topic	Information
Legal and policy background	Definition of disability	Relevant national legislation ²⁸³ establishing a definition of disability had been adopted prior to 2016, the year of ratification of the UNCRPD in Finland (FI). According to national law, a person is deemed as with disability in presence of long-term specific difficulties with his or her normal life due to a disability or disorder. In referring to the long-term dimension of disability, this definition is aligned with the UNCRPD.
	Disability policies	There is no National Disability Card but there are some local Disability Cards that cover different benefits in the different areas of the country.
Organisational set up	Legal basis	The Card entered into force in 2018. The implementation of the Card did not entail any new laws or regulations.
	Governance scheme	At the national level, the Ministry of Social Affairs and Health tasked the NGO, the Service Foundation for People with an Intellectual Disability (KVPS), with the responsibility of (DCNO) implementing the Card together with a steering group, which includes the Finnish branch of the EDF (Pirkko Mahlamäki), the Ministry of Social Affairs and Health (STM), the National Institute for Health and Welfare (THL), and the Social Insurance Institution of Finland (Kela). The issuing authority is KVPS.
	Recruiting and managing service providers	As of 2020, 283 service providers have participated in the Card ²⁸⁴ overall. The DCNO was responsible for the recruitment of service providers. It contacted them individually through emails and in-person meetings.
	Sustainability measures	The DCNO is responsible for funding the Card. The funding comes from the Funding Centre for Social Welfare and Health Organisations (STEA) ²⁸⁵ . Based on funding allocation decided by STM, available funds are distributed by STEA among NGOs concerned with Social welfare and health, including the DCNO. STEA funding covers salaries and staff costs for the Card's implementation, including communication activities and customer service. A €10 fee is meant to cover the costs of production and delivery of the Card.
	National website	The Card's national website was established in-house by Kela. It is an easy-to-read website with clear information in an accessible format. Notably, two language versions (Finnish/Swedish) and summary pages in English, Finnish and Swedish sign language are provided on the website. The website also includes the ReadSpeaker function, translating written language into spoken language. The website includes information on responsible bodies and benefits with a link to the EU webpage. It also includes information on all the service providers contacted by the DCNO. Furthermore, there are additional service providers offering benefits covered through the Card even though they did not formally notify the DCNO of their participation in the Card's scheme, hence their contacts are not included on the website.
Consultation with stakeholders not directly involved in the Card's management	Consultations with persons with disabilities were undertaken through local events across the country and through the Card's national website, videos and leaflets as well as materials in sign language. NGOs, persons with disabilities and service providers had the opportunity to evaluate the project after every event by using the feedback questionnaires.	

²⁸³ Finnish Human Rights Centre, Disability Services Act (380/1987).

²⁸⁴ Data were retrieved from the Card's national website.

²⁸⁵ The Funding Centre for Social Welfare and Health Organisations (STEA) is a standalone state-aid authority operating in connection with the Administration and Planning Department of the Ministry of Social Affairs and Health, which is responsible for the preparation, payment, monitoring, and impact evaluation of funds granted to social and health organisations from Veikkaus Oy gaming income. See at: <https://www.stea.fi/web/en/stea/organisation>.

Focus	Topic	Information
		<p>Many meetings were organised to understand the needs of persons with disabilities. Persons with disabilities were contacted primarily through social media (e.g. Facebook). Since there is no database of Cardholders, all persons with disabilities are contacted and asked whether they have the Card. In 2018, 400 persons with disabilities were consulted both before and after the Card's implementation. Consultation with other NGOs apart from KVPS took place on an <i>ad-hoc</i> basis. For example, the Steering Committee launched an initiative to include children with neuropsychiatric problems among the beneficiaries of the Card, considering that they are not eligible to receive assistance from the municipalities, hence their inclusion under the Card would have been particularly relevant. This and similar initiatives required collaboration with NGOs to clearly identify the needs of specific target groups and to understand how to proceed. Moreover, the Steering Committee consulted NGOs to test the Card and the system in place to receive the Card.</p>
Features of the system	Eligibility criteria	<p>There are 16 different criteria which entitle the applicant to disability status. The criteria are listed on the Kela website. If the person is eligible for one of such criteria, then he or she can apply for the Card. The DCNO defined the eligibility criteria in collaboration with disability organisations (STM, Kela, THL). A background survey to develop the criteria was launched by THL involving organisations representing persons with disabilities. The THL survey was completed in the spring of 2017, the criteria were approved during the Disability Forum Board meeting in September 2017 and were released shortly thereafter. Disability organisations commented actively on the preliminary criteria. An easy-to-read and easily understandable version of the eligibility criteria for the Card was produced by experts of the Finnish Association on Intellectual and Developmental Disabilities and published on the website. Kela is in charge of assessing the eligibility (criteria) to receive disability status. No additional assessment is needed to obtain the Card. Overall, the number of beneficiaries has reached to 5,157 in 2018. Between 100-150 new Cards are issued per week. Kela maintains the data regarding the number of submitted applications.</p>
	Databases of beneficiaries, persons with disabilities and service providers	<p>There is no permanent database of Cardholders because of privacy issues related to the GDPR, but Kela holds a database of the applications. This database of persons who applied for the Card remains with Kela while the application process is ongoing. When the process is over, the data are deleted. Kela finances and maintains this operation. A database of service providers was established and managed by the DCNO, who is in charge in also of uploading information, updating and maintenance.</p>
	Production	<p>As of 2020, in 2018, 5,157 Cards have been produced to meet the demand. The Card's production is outsourced to CardPlus which is a private entity selected to produce the Card through a formal agreement. The Card is valid for ten years. Unit production costs for the Card amounted to € 5.</p>
	Application process	<p>As of 2020, overall 5,157 applications were submitted. The DCNO is responsible for managing the applications for the Card. The DCNO verified whether the decisions on different disability services are still valid for the applicant against the criteria listed in the homepage of KVPS. Applications for the Card can be submitted through Kela's website by filing in a form and sending it by post. To facilitate the application, the following tools were used: customer service managed by Kela, phone, e-mail, social media, local support groups, and volunteers. Accessibility was taken into account in the process of development when testing the tools. A helpline was established by the DCNO to ease the application process. The helpline is free of charge and it is operational three days of the week (Monday, Tuesday and Wednesday). The helpline provides support for applying and using the Card, particularly for those who cannot access a computer. It takes about one month to receive the Card after submission of the application.</p>
	Delivery	<p>5,157 Cards were issued in 2018.</p>

Focus	Topic	Information
		Delivery of the Card is outsourced to the Finnish Post, a private company, through a formal agreement with the DCNO. Applicants pay 10 EUR to receive the Card, which covers the cost of production and delivery. Users can pay through online banking, when the application is made online, or through a paper invoice.
	Security Mechanisms	A hologram, a microchip and formal agreements are in place as security mechanisms for the Card. In FI, there are strong privacy laws, compliant with GDPR, which forbids the sharing of personal information with third parties, without the permission of the customer. Moreover, data about Card usage are only stored for a period of four months. The number of Cards and related contact details are instead kept permanently. Fraud is rather difficult to achieve as Kela holds the database of its customers, based on which the Card is issued. Protection mechanisms for the Card's delivery are ensured by the trustworthiness of the Finnish Postal company, which is used to deliver all the public cards. Reporting loss of the Card has to be done by contacting the DCNO, and a new application is required in case of loss.
	National package of benefits	The steering group, in collaboration with the service providers, is responsible for defining the package of benefits. All four sectors in scope are covered and benefits include both free entrance and price discount, depending on the service provided, and special services may also be provided by some service providers ²⁸⁶ . Benefits offered in the transport sector cover the following transport means: train, extra-urban buses, urban buses and taxis. Free access for the Assistants is provided if the Card has the 'A' symbol. However, this is provided on a voluntary basis by the service provider (there is not a general provision). Usually, personal assistants are granted free entrance or free transportation when accompanying a person with disabilities. The Finnish Railway Company is covered by the Card and has been involved in the Card since the beginning. The bus system, which is regulated at the regional level, is not covered.
	Problems encountered with the use of the Card	The problems that have arisen with the use of the Card are mainly practical ones including difficulty in application procedures. In case of problems, Cardholders can call a toll-free phone number, send an email, or make contact via social media to report problems. The DCNO and Kela are responsible for handling complaints.
Awareness-raising	Awareness-raising activities	The awareness-raising and communication campaign were organised throughout the pilot period, and especially during 2018-2019. Awareness-raising activities were carried out through various channels including, radio, TV, social media, and press releases. The Finnish national public service broadcasting company promoted the Card on the news and in sign language. Furthermore, video materials for persons with disabilities and service providers were created in three languages (Finnish, Swedish & English). Leaflets for persons with disabilities in two languages (Finnish and Swedish), were also produced (1.200 in Finnish and 500 in Swedish - all disseminated during the first year). In addition, KVPS leaves pamphlets of the Cards to different events without having any presentation. Moreover, a meeting with service providers was arranged with the aim of increasing their awareness. This was needed as there are many unregistered service providers which do not advertise their benefits on the Card's national website, even though they offer a variety of services to beneficiaries. This is an issue for beneficiaries who want to know about services and benefits covered through the Cards, particularly those who want to travel to FI from other Member States. To address this issue, the DCNO has organised two events for service providers. They were invited to the events by phone and email and provided information about Card and on the importance of registering themselves on the website. Reaching service providers is one of the priorities for the coming year. Finally, to promote the involvement of disability organisations, were carried out steering groups and local events with local NGOs.

²⁸⁶ No further information on the types of services offered was provided.

Focus	Topic	Information
Results	Monitoring and evaluation activities	The DCNO has completed a feedback survey. In addition, the DCNO has carried out a final evaluation of the first financial period. According to the report, the Card is well-established, and users have had good experiences using the Card abroad as well. For example, the Cards were also used in countries where the Card has not yet been officially introduced (such as Spain and France).
	Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events	According to the second round of surveys (May 2020), the vast majority of Cardholders report that additional accessibility improvements are needed, especially in the culture and public transport sectors. Finnish Cardholders perceived the highest improvement in their cultural participation due to the Card with almost three out of four reporting at least a slight increase and one in four perceiving a large increase. FI ranks second, after RO in terms of perceived impact on sport participation. With respect to tourism abroad, FI ranks last, probably due to the already high tourism participation prior to the Card.
	Socio-economic benefits	With the exception of public transport, Finnish Cardholders reported the highest Card use across all sectors in scope by a considerable margin.
	National good practices	The national railway company has been involved in the Card's scheme since the project's inception. This ensured broad coverage of the transport sector. Notably, according to the DCNO, the involvement of a well-known service provider with a nationwide scope contributed to prompting other service providers into the scheme.

9.5. Italy

Figure 31 - Key actors involved and activities performed

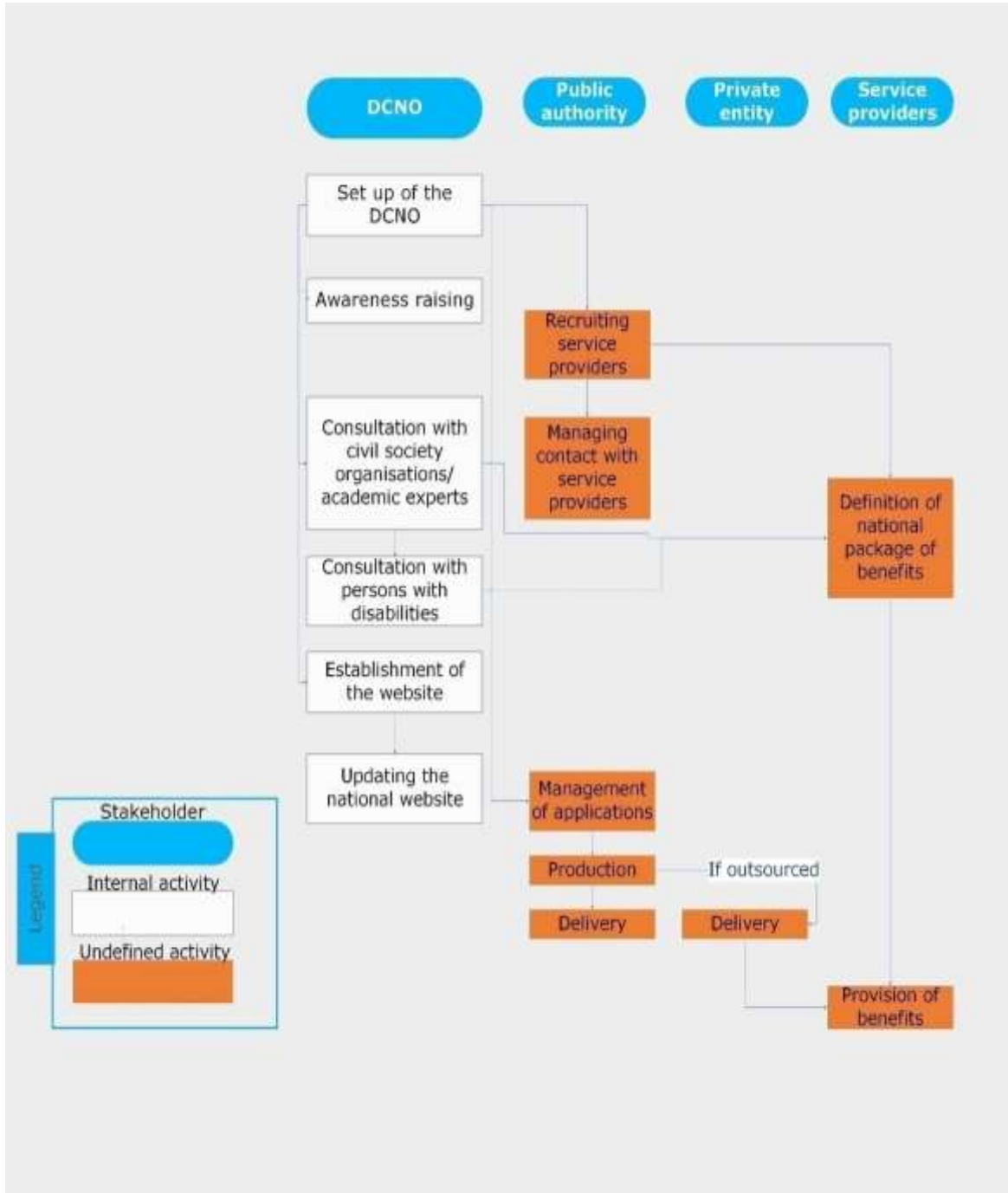


Table 39 - Country fiche: Italy

Focus	Topic	Information
Legal and policy background	Definition of disability	National legislation deems disability as a physical, psychological or sensory impairment, stable or progressive, which is the cause of difficulty in learning, relationships or integration in working life and that determines a process of social disadvantage or marginalisation ²⁸⁷ . IT applies the UNCRPD.
	Disability policies	Participation in the pilot action was preceded by a study phase conducted by Federazione Italiana Superamento Handicap (FISH) since 2017 to understand disability issues within the Member State. The study noted a discrepancy at both the regional and municipal levels in terms of benefits provided to persons with disabilities. However, at the national level, persons with disabilities, identified by the Law 104/1992, benefit from tax deductions on medical expenses as well as insurance and assistance measures. The Card project represented an opportunity to harmonise benefits across different areas of the country. In Italy, there is no National Disability Card.
Organisational set-up	Legal basis	<p>Relevant legislation includes:</p> <ul style="list-style-type: none"> • Law 104/1992 granting a set of benefits to persons with disabilities. • The Act of 30 December 2018, n. 145, State Budget for the 2019 financial year and multi-year budget for the 2019-2021 three-year period (Ordinary Supplement No. 62 / L to the Official Gazette General Series - No. 302 of 31-12-2018) • Section I: Quantitative measures for the implementation of programmable objectives - Art.1 (Differential results. Rules on entry and expenditure and other provisions. Special funds), Paragraph 563. <p>On 22 December 2017, FISH organised a conference to launch the Card, inviting the National Social Security Institute (INPS), which is the authority in charge of providing benefits to persons with disabilities at the national level. In 2018, a legal provision was inserted in the national budget package, identifying:</p> <ul style="list-style-type: none"> • The issuing authority (INPS); • The budget for funding the Card (EUR 1.5 million for each of the years 2019, 2020, 2021). <p>However, according to this legal provision, an implementing decree was needed to apply the law and identify the beneficiaries of the Card system. Hence, the implementing decree should have identified the beneficiaries of the Card system. However, while the National Institute for Social Security (INPS) realised a draft, such a decree was never drawn up. As such, the Card system was never implemented. Indeed, the budget package entrusted the Ministry for Family and Disability with adopting a decree, defining the criteria for issuing the Card. At that time, the Ministry of Family and Disability was considered by INPS as a strong interlocutor to issue the Card in IT. However, with the current government, the new Ministry of Family and Equal Opportunities has no competency over disability, which is up to the Prime Minister, and no department has been entrusted with disability policy.</p>
	Governance scheme	<p>The management of the Card system is based on cooperation between FISH, the Ministry of Labour and Social Policies and several other ministries including the Ministry of Cultural Artistic Heritage and Tourism; the Ministry of Transport and INPS. The DCNO is FISH. INPS is the issuing authority as set out in the Act constituting the legal basis for the Card. Given its institutional responsibilities, INPS is the public authority responsible for handling matters related to disabilities. INPS is in charge of assessing the disability status. Notably, since 2010, INPS holds a unified database (a digital platform) of all medical examinations carried out by Local Health Agencies (ASLs). Hence,</p>

²⁸⁷ LEGGE 5 febbraio 1992, n. 104, Legge-quadro per l'assistenza, l'integrazione sociale e i diritti delle persone handicappate. (GU n.39 del 17-2-1992 - Suppl. Ordinario n. 30).

Available at: <https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1992-02-05:104!vig=>.

Focus	Topic	Information
		<p>entrusting INPS with the issuing of the Card appeared to be the most cost-effective solution. Therefore, the Card's implementation system was planned to be entirely centralised and managed by the INPS central office.</p> <p>The League for the Rights of People with Disabilities (LEDHA) also played a role in setting up the Card (planning, data collection, analysis of data, etc.).</p> <p>Finally, E.Net²⁸⁸ contributed to legal and statistical activities and to all communication activities.</p>
	Recruiting and managing service providers	The issuing authority (INPS) is expected to be the authority responsible for recruiting service providers and managing contacts with them. They were also in charge of coordinating private entities along with the Ministry of Labour and Social Policies.
	Sustainability measures	A yearly budget of 1.5 million € was allocated to INPS to finance the Card for three years. The idea was to implement the Card with national funding for the first 3 years and then carry out an evaluation to encourage government to continue investing (and invest more) in the Card. The allocated funds would cover only production and delivery costs. The other management costs were not accounted in the budgetary provision since INPS was planning to internalise them and cover them through its ordinary budget.
	National website	E.Net (of which FISH is a member) was in charge of creating the website for the Card. The back office of FISH Onlus manages it. The national website was not updated frequently, once or less frequently a year.
	Consultation with stakeholders not directly involved in the Card's management	<p>Consultation and cooperation activities were carried out with the competent entity on Cinema, Theatre and public concerts (Italian General Association for Performing Arts – AGIS).</p> <p>Consultations also were carried out with civil society organisations, which were reached through focus groups, and persons with disabilities, who were reached through focus groups and online as well as through telephone surveys. Consultations with academic experts were conducted as well.</p> <p>Gathered feedback was used to define the package of benefits and to design the implementation system, including the identification of other possible stakeholders and the implementation of promotion activities to raise awareness for the Card.</p>
Features of the system	Eligibility criteria	<p>Law 104/92 for a Framework on assistance, social integration and rights of persons with disabilities outlines the definition of disability at the national level.</p> <p>The implementing decree by the Ministry of Family and Disability should have identified the beneficiaries of the Card. This decision on the eligibility criteria was meant to be linked to the formal criteria on disability recognition (e.g. percentage of disability/those who held a certificate attesting severe impairment, etc.). The establishment of such criteria implies a series of considerations both political and financial.</p> <p>Once the criteria had been identified, it would have been easy for INPS, which stores data of persons with disabilities in IT, to identify the eligible persons.</p> <p>Although not defined by law yet, expected eligible persons are persons with above 67% of disability. This pool includes those who benefit from "<i>indennità di accompagnamento</i>", i.e. those who have severe disability and need an accompanying person (accounting for about 2/3 of the total estimated eligible persons). Since they are considered to be very unlikely to travel, the expected number of eligible persons for the Card is smaller than the entire pool of persons with above 67% of disability (around 2 million people, perhaps less).</p>
	Databases of persons with disabilities, beneficiaries and service providers	<p>A new database with information on eligible persons was not created. INPS holds and manages a unified database (a digital platform) of all medical examinations carried out by the Local Health Agencies - ASLs.</p> <p>FISH conducted a national analysis establishing which are the service providers operating at national/regional/local levels and reported them on the website.</p>

²⁸⁸ E.Net is a limited liability consortium company of which FISH is a member. It provides services in the field of research and consultancy, web development, education and communication. See at: <https://www.agenziae.net/#about>.

Focus	Topic	Information
	Application process	Application for the Card is expected to be managed by INPS, which is responsible for assessing the eligibility criteria. The application is online-based on a standard form through which applicants can upload their photos. No new assessment is expected to be required.
	Production	INPS is expected to be the authority responsible for the Card's production, at an expected cost of production and delivery of 1.3 EUR per Card.
	Delivery	Postel s.p.a. had been identified as the institution in charge of delivery (but no agreement has been signed). FISH considered the option of delivering the Card for free.
	Security mechanisms	INPS already complies with Data Protection standards. The Card should have a QR code as an antifraud mechanism. The QR code would serve as a substitute for all the appropriate documentation attesting to the user's disability status. Also, it would automatically be updated following changes in the disability status. To prevent unauthorised use and duplication as well as fraud and other abuses, the Card is expected to be registered online.
	National package of benefits	The Card would have become a substitute for the disability certificate issued by INPS. There would have no longer been the need to proceed with stipulating bilateral agreements with service providers because the Card would have been recognised by law as a document attesting to a person's disability, therefore the provision of discounts or facilitations would have been based on the national law. The Card would have conferred benefits to assistants of Cardholders whose Card is marked with an 'A'. However, this had to be negotiated with each service provider. For cultural and sporting events, an agreement between the Ministry of Cultural Heritage and Cultural Activities was signed. With the previous agreement, only the Ministry of Cultural Heritage and Cultural Activities has accepted to offer benefits or free entrance to all national museums and archaeological sites under own competences. In the future, the Card should permit access to facilities in all local and private museums and archaeological sites, to the cinema, theatre and concerts, to sport events, and to some transportation services.
Awareness-raising	Problems encountered with the use of the Card	Although the Card has not been issued yet, FISH and Federation of national associations of persons with disabilities were expected to be allocated part of the national Card's budget in order to handle potential complaints.
	Awareness-raising activities	Although awareness-raising activities were not conducted, communication activities pertaining to the Card were carried out through DCNO's internal channels to raise awareness among DCNOs' associates. Communication tools to raise awareness include a website, social network and blog dedicated to the Card in four languages and also in easy-to-read version in Italian as well as a public meeting for the launch of the Card, which included press conferences and public debates/roundtables. Activities carried out were meant to define beneficiaries, implementation of the system, authorities responsible for producing and issuing the Card, agreements with the Ministry of Cultural Heritage and Cultural Activities, identification of other possible stakeholders, and public presentation of the Card.

9.6. Malta

Figure 32 – Key actors involved, and activities performed

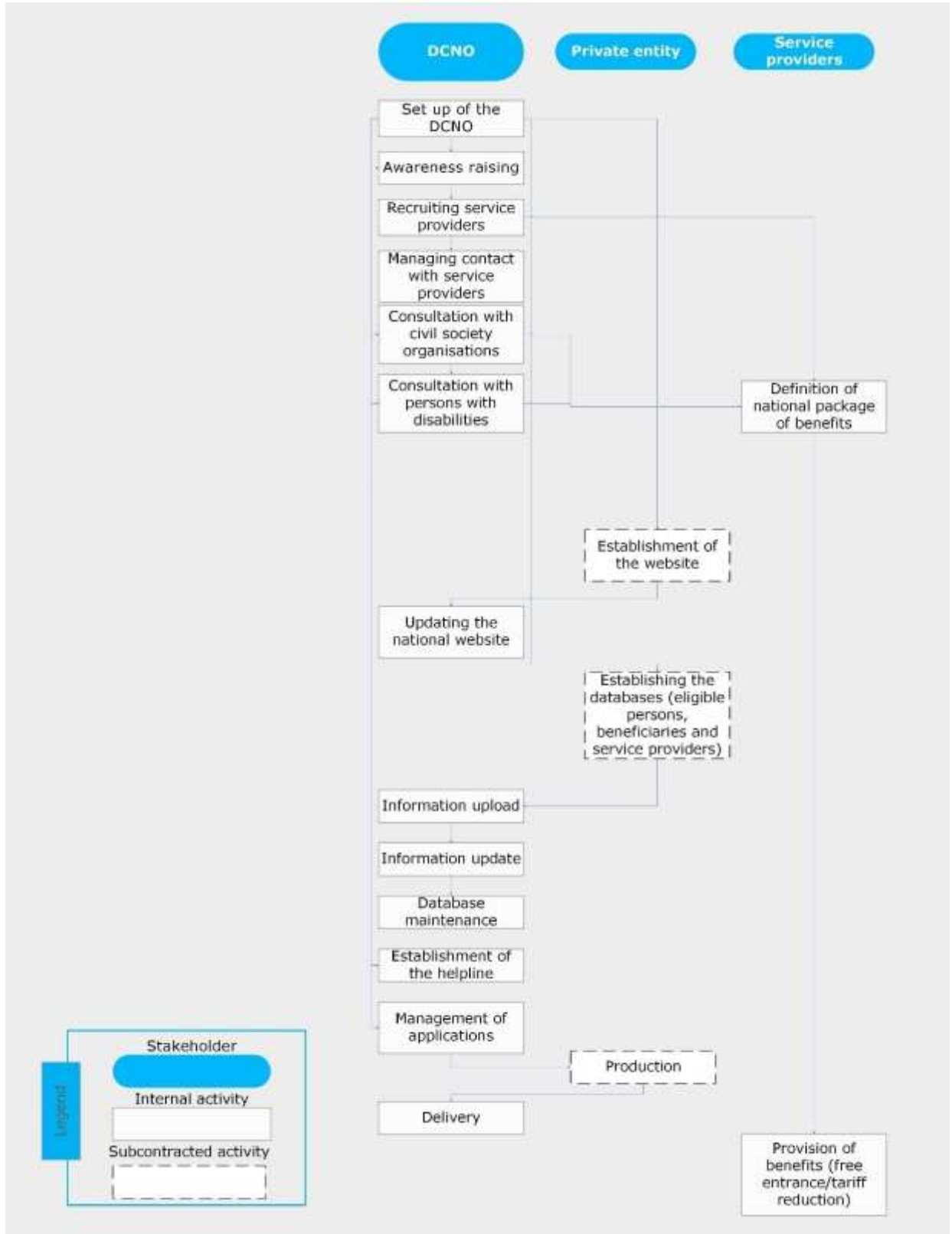


Table 40 – Country fiche: Malta

Focus	Topic	Information
Legal and policy background	Definition of disability	National legislation adopts the UNCRPD definition of disability, i.e. a long-term physical, mental, intellectual or sensory impairment that in interaction with various barriers may hinder one’s full and effective participation in society on an equal basis with others (Equal Opportunities (Persons with Disability) Act, Chapter 413).
	Disability policies	<p>There is a National Disability Card²⁸⁹ and providing the following benefits:</p> <ul style="list-style-type: none"> • Culture: free entrance and price reductions • Leisure: free entrance and price reductions • Sport: price reductions • Private transport: price reductions • Public transport: price reductions. <p>Except for public transport, which is not covered by the EU Disability Card, the benefits provided by the National Disability Card correspond with those covered through the EU Disability Card.</p>
Organisational set-up	Legal basis	The Card entered into force on 15/02/2016.
	Governance scheme	The Card system is centralised at the national level. The DCNO is the Commission for the Rights of Persons with Disability (CRPD), a public entity belonging to the Ministry for the Family, Children’s Rights and Social Solidarity. The DCNO is the issuing authority.
	Recruiting and managing service providers	As of 2020, 28 service providers have participated in the overall Card system ²⁹⁰ . The DCNO recruits service providers on an individual basis and is responsible for managing contacts with them. The service providers are contacted by emails, phone/Skype calls and personal meetings.
	Sustainability measures	The funding for the Card is public at the national level. The DCNO funds the Card system through the budget provided by the Ministry for the Family, Children’s Rights and Social Solidarity.
	National website	The DCNO outsourced the establishment of the Card’s national website to a private entity. The DCNO is in charge of updating it every two or three months.
	Consultation with stakeholders not directly involved in the Card’s management	The CRPD council is made up of different entities, including organisations of persons with disabilities and NGOs representing persons with disabilities. In addition, persons with disabilities were invited by the DCNO to provide feedback so as to define the package of benefits through a public consultation process, and through their NGOs/DPOs. Notably, a conference was organised prior to launch the project. During the conference, attendants were encouraged to contact the DCNO to provide suggestions throughout the whole project’s implementation. The research department of the DCNO was also consulted on the Card key implementation features.
Features of the system	<p>Since the Card’s launch, the number of beneficiaries amounted to 11,009²⁹¹ between February 2016 and June 2020.</p> <p>Any person with a disability, irrespective of gender and age, as defined by the Equal Opportunities Act and the Social Security Act is entitled to receive a Card.</p>	

²⁸⁹ The National Disability Card is called “Special Identity Card – SID”. See at: <https://crpd.org.mt/services/sid-eu-card/>.

²⁹⁰ This was retrieved from the Card’s national website.

²⁹¹ This figure is an estimate based on the number of Cards issued and produced.

Focus	Topic	Information
		<p>Previous certificates and/or disability entitlements are required to receive the Card. In particular, the eligibility procedures to receive the Card correspond to the ones for the national Disability Identity Card, established in 2017. The assessment is carried out by CRPD Executive Director. When the CRPD Executive Director is able to easily assess the condition and a new assessment is not required, the Card is issued automatically. In cases which are not clear-cut, the CRPD asks for medical assessments to be made by independent medical professionals. Medical experts are asked to assess whether the person qualifies as a person with disability.</p>
	Databases of persons with disabilities, beneficiaries and service providers	<p>In MT there is only one database where the data of the applicants are retained. Persons with disabilities can submit the application to the Card on the EU Disability Card's website, which is linked to the database recorded the information. The database of beneficiaries contains contact information, sex, age (including date of birth) and impairment type (physical, hearing, visual, intellectual, psychological or a combination of these) of the beneficiaries as well as the Card issuance and expiry date.</p>
	Application process	<p>Overall, 11,009 persons applied for the Card between February 2016 and June 2020. Persons with disabilities may submit their application either online or at the DCNO office. The applicant can apply online on the Card's website, otherwise s/he can fill out the application directly on the CRPD website in English or Maltese and submit it to the CRPD offices. The applicant provides basic contact/personal details with a passport photo and a description of the impairment provided by a family doctor.</p> <p>If an application is received and approved by the CRPD Executive Director, then the applicant waits an average of two weeks to receive the Card. If the application is assessed by a medical professional, then CRPD is dependent on the availability of the medical professionals to hold the assessment sessions. After the applicant has had their appointment with the medical professional, the wait for a decision would be 2 to 3 weeks on an average.</p> <p>A helpline was established inhouse for supporting persons with disabilities both for applying to the Card and for using it.</p>
	Production	<p>To date, an overall 11,009 Cards were produced between February 2016 and June 2020. The Card's production is sub-contracted to a private local printer.</p> <p>As printing the Card in braille was expensive (it almost doubled the cost of the Card because it was hard to print braille on a plastic card without damaging the printers), it was decided to produce two types of Cards: one without braille and one with braille. The latter could be obtained only by request by ticking a box on the website when applying for the Card. So far, about four Cards in braille were printed, and this solution proved to be cost-effective. Unit production costs for the Card amounted to €2.50.</p>
	Delivery	<p>Overall, 11,009 Cards were issued between February 2016 and June 2020.</p> <p>The DCNO is responsible for delivering the Card, which is free of charge to the beneficiary.</p> <p>The DCNO then sends them to beneficiaries by post or informs the beneficiaries that they can collect the Card (based on the preference they have indicated).</p>
	Security mechanisms	<p>A hologram incorporated in the Card serves as a security mechanism. Furthermore, access to the database of eligible persons and Cardholders is restricted to the CRPD employees who run the service. The database is hosted on a secure cloud with all mandatory security protocols in place. The back end of the Card's website, which contains the details of the service providers, is restricted to a limited number of persons and is also protected and hosted in a secure manner.</p> <p>There are no specific mechanisms to protect the Card's production. However, the private printer in charge of the Card production is the same entitled to produce all public Cards at the national level. The printer complies with ISO 9001 standard; thus, it is highly trusted. Each Card has a hologram and is associated to a unique number to prevent duplication.</p> <p>In case of loss beneficiaries can report to the DCNO in person or by phone.</p>
	National package of benefits	<p>The Card covers the culture, leisure, sport and private transport (taxi) sectors. Specifically, under the Card's scheme, the following benefits are foreseen:</p> <ul style="list-style-type: none"> • Culture: free entrance and price reductions

Focus	Topic	Information
		<ul style="list-style-type: none"> • Leisure: free entrance and price reductions • Sport: price reductions • Private transport: price reductions <p>Whether the services/benefits bestowed by the Card also apply to Assistants of persons with disabilities is up to the discretion of the service provider.</p> <p>While public service providers offering benefits regarding transport include different modes of transport such as ferry and hospital transport free of charge, private service providers offering benefits regarding transport such as taxis and helicopters offer discounts on their services.</p> <p>The service providers offering benefits regarding cultural events and activities are both public and private and offer discounts on their services. Various cultural services are covered, including heritage and nature-related services as well as museums.</p> <p>Service providers offering benefits regarding leisure include those related to shopping, children's parks, theatres, falconry, and hotels. They offer discounts or free entrance on their services.</p> <p>Service providers offering benefits regarding sport include those related to swimming and aquatic sports, basketball, football and racing. They offer discounts or free entrance on their services.</p>
	Problems encountered with the use of the Card	<p>Despite numerous emails sent by the DCNO to service providers to inform them on the introduction of the Card, some beneficiaries said their Card was not accepted. Whenever this happened, the DCNO contacted the service providers to inform them of the existence of the Card. Often, the Human Resources (HR) departments of companies wanted to offer the discount to Cardholders but did not tell their employees who would have been responsible for giving the discount.</p> <p>Most problems were encountered in the transport and leisure sectors although only for the first few months of the implementation. The DCNO is the authority responsible for handling complaints. The Cardholders can voice their complaints by phone, email or in-person and the DCNO will then deal with the problem in such cases.</p>
Awareness-raising	Awareness-raising activities	<p>The awareness-raising activities were carried out from March 2016 until January 2018.</p> <p>When the Card was introduced, an email was sent to all the government departments, entities such as Transport Malta, and organisations and ministries who offered services related to the national Disability Identity Card, named Special Identity Card (SID). Further emails were sent, the Card serial number was replaced by the applicant's original SID number, and the words 'SID No' were shown on the Card, so that it could be easily recognised as the SID replacement.</p> <p>Communication and awareness-raising campaigns were carried out during the project, including: events, conferences, and meetings as well as radio advertisements, four advertisements in four newspapers, email awareness-raising through newsletters, vehicle wrap of CRPD cars, installation of advertisements on bus shelters, airing of a 30 second animation advert on TV, and press interviews. Additionally, two conferences were organised (a project launch conference and a national conference) and a social media campaign was carried out. Moreover, the DCNO launched a website in order to raise awareness on the Card in MT, detailing the benefits, application process, and the project through which the Card was introduced. It also links to the other participating Member State websites.</p> <p>The DCNO also launched an information and publicity campaign to disseminate information on the use of the Card and how one can apply for the Card. The campaign comprised of online advertisements including an animated clip on Google, on Facebook, advertisements on bus shelters and a leaflet in English, Maltese and in easy-to-read formats. The campaign continued in 2018 in newspapers and on radio and TV stations. A Card advert also featured on two of CRPD's cars.</p> <p>Promotional activities targeted national cardholders, public service providers, private service providers, businesses/companies and persons with disabilities. DPOs and NGOs were consulted and informed of progress throughout the process.</p>

Focus	Topic	Information
Results	Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events	Qualitative anecdotal evidence reported by the DCNO suggests that several service providers made accessibility changes under the guidance of persons with disabilities. In the second survey (May 2020), two out of three service providers stated that they made accessibility changes since the introduction of the Card in February 2016. Except for the sport sector, more than half of Cardholders filling the survey reported that they perceived an improvement in their cultural participation and tourism abroad due to the Card.
	Social-economic benefits	Card use was relatively low across all sectors, especially the sport sector which was not included in the package of benefits. 10%-15% of respondents use the card frequently in the transport sector. All service providers responding to the second survey report that the Card had a positive effect on their institutions. One out of the three service providers filling the survey reported that costs outweighed the benefits.
	National good/bad practices	<p>Good practices</p> <ul style="list-style-type: none"> • Enforcing physical accessibility of service providers • Advising accessibility of service provider websites and benefits offered <p>Bad practices</p> <ul style="list-style-type: none"> • Not exerting sufficient effort to receive the consent of all service providers to share the information regarding their services on the website. While nationals knew that these service providers were participating in the programme, for foreigners it was not possible to access this information.
	Financial consequences of the CARD mutual recognition	While concerns regarding the large inflow of foreign Cardholders were raised by service providers, in practice these concerns did not materialise.

9.7. Romania

Figure 33 - Key actors involved and activities performed

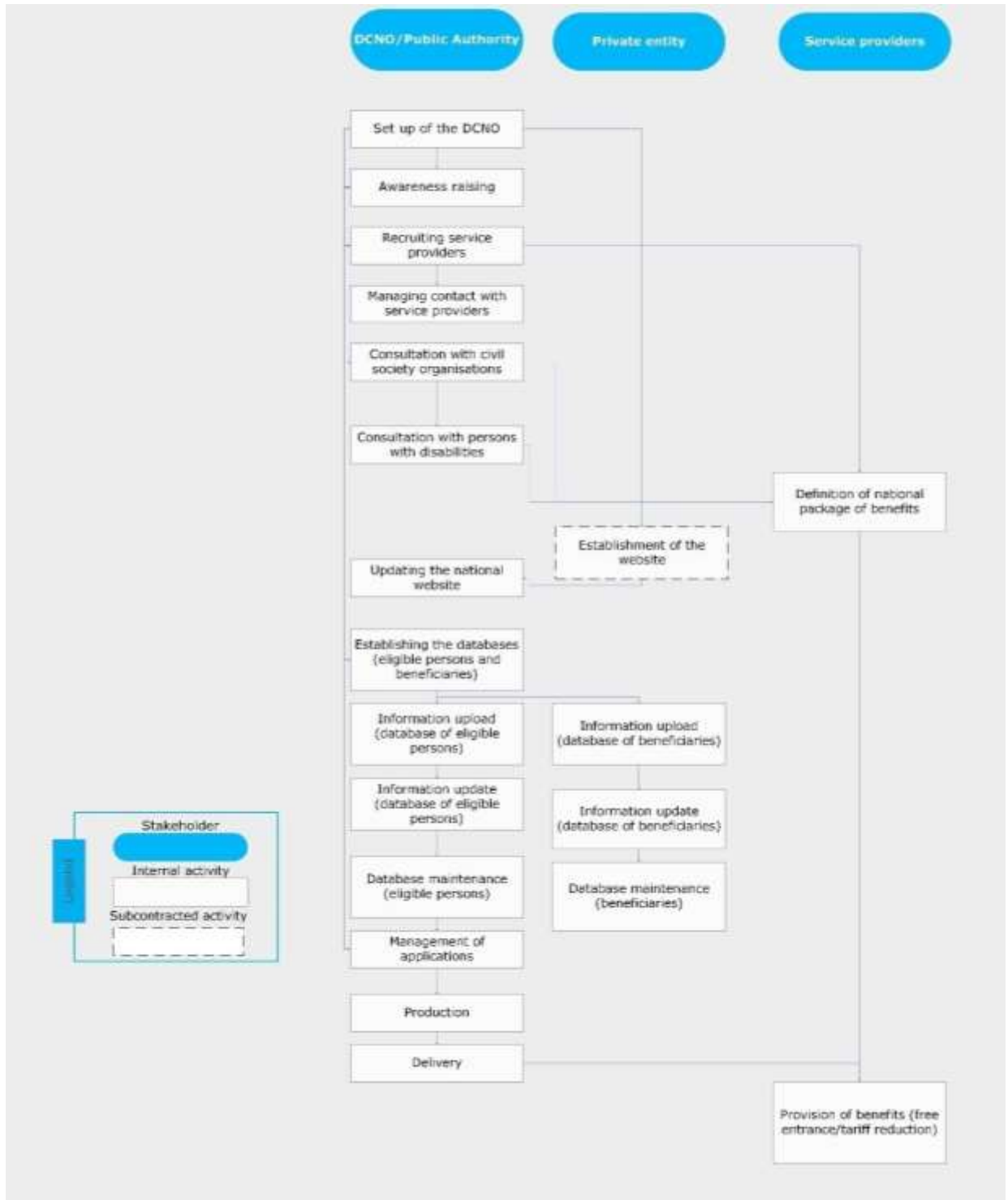


Table 41 - Country fiche: Romania

Focus	Topic	Information
Legal and policy background	Definition of disability	Under the national legislation, disability is defined as the incapability to undertake daily activities under normal circumstances, thus requiring protection measures to support physical recovery, integration and social inclusion ²⁹² in accordance with the UNCRPD definition that Romania ratified with law number 221/2010 ²⁹³ .
	Disability policies	In RO, there are different provisions of law regulating the provision of disability-related benefits depending on the degree of disability ²⁹⁴ . Notably, national legislation recognises four degrees of disabilities, which are attested by a national disability certificate. The holders of this certificate can access a range of benefits offered by public service providers in the culture, leisure, sport and transport sector. However, law-mandated benefits only concern accentuated or severe disabilities leaving out moderate or light disabilities ²⁹⁵ .
Organisational set-up	Legal basis	The Card entered into force on 01/02/2016. At the national level, decision no. 53/2016 of the National Authority for Persons with Disabilities (NAPD) establishes the legal basis for the Card. Furthermore, law no. 448/2006 on the protection and promotion of the rights of persons with disabilities regulates the protection and promotion of the rights of persons with disabilities. Moreover, the UNCRPD, including the article 30 on Participation in Cultural Life, Recreation, Leisure and Sports of the UNCRPD was ratified in RO.
	Governance scheme	NAPD is the DCNO. NAPD is in charge of managing the Card and acts under the Ministry of Labour and Social Affairs. At local level, the DCNO is represented by DGASPC, communicating and engaging directly with persons with disabilities. The DCNO is the issuing authority.
	Recruiting and managing service providers	As of 2020, 218 service providers have participated in the Card system ²⁹⁶ . The DCNO is responsible for recruiting service providers and managing contact with them through cooperation protocols. As service providers covered by the Card are all state-owned, the scheme is legally binding. Hence, service providers were automatically prompted into the Card's scheme through official requests by the DCNO addressed to the Ministries competent for the sectors in scope. Communications with service providers are mediated by the DCNO and transmitted to the Ministries competent in the sectors in scope. For instance, in case service providers are not compliant (i.e. benefits are not properly offered), complaints are collected by the DCNO and then forwarded to the Ministry/authority overseeing the service provider where the problem occurred.
	Sustainability measures	The DCNO is responsible for funding the Card through the budget provided by the Ministry of Labour and Social Affairs.
	National website	The establishment of the Card's national website was outsourced to a private entity. The DCNO is in charge of managing, updating and uploading information on the website every 7-11 months.

²⁹² See at: http://www.mmuncii.ro/pub/imagenanager/images/file/Legislatie/LEGI/L448-2006_rep.pdf.

²⁹³ Hurjui, Ioan; Hurjui, Cristina Marcela. *General Considerations on People with Disabilities*. Rom J Leg Med [26] 225-228 [2018]. <http://www.rjlm.ro/system/revista/46/225-228.pdf>.

²⁹⁴ It is compulsory for national (provided by the state) cultural/sports/touristic/leisure institutions to facilitate the access of persons with disabilities. As such, children with disabilities and personal assistants receive free access to museums, shows, artistic and sports manifestations. Adults with severe disabilities and their personal assistants benefit from gratuity for the above activities. Adults with light or medium disabilities benefit from the same reduced-price entry as students.

²⁹⁵ Source: focus group with the DCNO.

²⁹⁶ Data were retrieved from the Card's national website.

Focus	Topic	Information
	Consultation with stakeholders not directly involved in the Card's management	<p>Civil society organisations were involved in dissemination activities organised by the DCNO in 2016, before the launching of the Card. Agreements were made with the National Association of Deaf People from Romania, the National Association of Blind People and Step-by-Step Association centre for education and professional development to disseminate the information regarding the benefits among their members.</p> <p>In 2016, the DCNO signed a collaboration protocol with the National Association of Deaf People in Romania and the National Association of Visually Impaired Persons.</p> <p>On 5 December 2016, the DCNO and the Cabinet of the Prime Minister organised a conference where all stakeholders (private, state, persons with disabilities, and NGOs) were invited to participate in the discussion around challenges and problems encountered after the implementation of the Card.</p>
Features of the system	Eligibility criteria	<p>Overall, the number of beneficiaries was 14,649 between February 2016 and June 2020.</p> <p>Eligible persons include Romanian children and adults with severe, accentuated, medium or light disabilities, based on a valid certificate of disability.</p> <p>Despite a change in the disability status of a person (increased/decreased/abolished), the Cardholder can still benefit from the advantages until the expiration date (August 2020).</p> <p>Only persons who have a disability certificate are allowed to hold the Card. The disability assessment is made by an evaluation committee, part of the DCNO.</p>
	Databases of persons with disabilities, beneficiaries and service providers	<p>A database of eligible persons was already established by the DCNO during another project conducted in place and managed by the DCNO. A central database with information on beneficiaries was established at the beginning of the Card project, and the DGASPCs are in charge of the local databases of beneficiaries.</p> <p>All databases include extensive personal information on persons with disabilities (e.g. age, sex, education, etc.). The DCNO and the DGASPCs are in charge of both databases that are updated on a continuous basis. Maintenance and information upload of the database of beneficiaries is outsourced.</p> <p>A database of service providers was not established, but existing ones are posted on the project's website.</p>
	Application process	<p>Overall, 14,396 applications were submitted between February 2016 and June 2020.</p> <p>The person wishing to apply for the Card must complete an application and send a recent photo to the DGASPC local office or to the central one in Bucharest. The application must include the ID number of the certificate attesting to their disability status. The application is then submitted, electronically or in person, to the county DGASPC to which the person belongs. The application procedure is simple and can be done via email. The DGASPC sends a centralised table to the DCNO each month with the registered applications. NAPD processes the applications, approving or rejecting them, prints and personalises the Cards and sends them with the accompanying informative leaflets to the DGASPC. The DGASPC communicates the date when the beneficiaries will be contacted to pick-up their Cards.</p> <p>The DCNO processes applications weekly and the Card is usually ready to be collected within 30 days from the application.</p>
	Production	<p>Initially, the production and personalisation of the Cards were outsourced by the DCNO to a private entity. The procurement procedure was done according to art. 7(5) of Law 98/2016 on public procurement, and it was a direct procurement, without a tender. The Cards were personalised with braille writing and a security hologram. The stock of Cards from the private provider was of 50,000 Cards. When the contract with the private entity ended in 2017 it was not renewed as the project had savings which were reallocated towards the procurement of a specialised printer. This allowed the DCNO to internalize the personalization of Card. There is no strategy in place for the production of Cards when the stock from the private provider will be exhausted: it has not been decided whether further Cards will be produced, or the project will end.</p> <p>Unit production costs per Card amounted to €1.10.</p>

Focus	Topic	Information
	Delivery	As of 2019, 14,649 Cards were issued between February 2016 and June 2020. The Card is picked up by the applicant at the office of his/her local DGASPC (there are six in Bucharest and one per each of the 41 counties). Delivery of the first 50,000 Cards is free. Usually, the time between the submission of the application and the collection is one month.
	Security mechanisms	To ensure protection of the database of beneficiaries, a password system was established at DGASPC level and administrator credentials at the DCNO level. In case the Card is lost, the Cardholder must declare it null in a local General Directorate before requesting a new one. The costs for issuing a new Card in the case of theft or loss are undertaken by the Cardholder. The submitted application must include the declaration of theft.
	National package of benefits	The Card offers cultural, sports and leisure benefits. Benefits in public transport are covered by other national legislative measures for persons with disabilities. All Cards produced have symbol 'A' marked on them. Hence, the benefits also apply to the personal assistants of persons with disabilities. Whilst under the national legislation only the personal assistants of persons with severe or accentuated disabilities benefitted from free services, the introduction of the Card enlarged this benefit to the caregivers of persons with all degrees of disabilities. There are protocols in place for cooperation between the DCNO, the competent Ministries in the sectors in scope as well as local administrations. There are 18 benefits packages covered in this protocol ²⁹⁷ . There are protocols in place for cooperation between the DCNO, the Ministry of Youth and Sport, the Romanian Football Association and the Romanian Handball Federation. These protocols grant access to persons with disabilities to sporting events organised by the Association and Federation throughout the country.
	Problems encountered with the use of the Card	The main problem identified by the DCNO is the non-recognition of the Card by some service providers. To address this issue, whenever it receives complaints from beneficiaries, the DCNO contacts the service providers to make sure they offer the benefits they agreed to during the recruiting phase.
Awareness-raising	Awareness-raising activities	The DCNO implemented a series of awareness-raising conferences with the stakeholders involved during the first year after the implementation of the Card. The communication plan included: an information campaign; a press conference to launch the project (01/03/2016); a website including the benefits covered by the Card, informational materials developed and disseminated (via TV, radio spots, leaflets, posters, presentation folders, roll-up, etc.); an interim Conference and events organised on the occasion of 3 December - International Day of Persons with Disability; a dissemination network created with DGASPC and associations of persons with disabilities; three debates (Bucharest - 21.03.2016, Iasi 04/19/2016, Sibiu - 04/21/2016), and a final Conference organised for the closure of the project (Bucharest, 20.12.2017).
Results	Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events	Qualitative evidence indicates that the accessibility of services is still a major issue in Romania and needs to be addressed in order to increase the effectiveness of the Card. Cardholders reported a much better user experience abroad than at the national level where the Card was not easily accepted, confirming the EU added value brought by the Card. RO ranks first in the second round of surveys (run in May 2020) in terms of the share of Cardholders reporting at least a slight increase in sport participation and tourism abroad, and second (after FI) in terms of cultural participation.
	Social-economic benefits	Since the Card appears to have increased tourism abroad, this is likely to bring higher benefits to RO Cardholders given the countries lower GDP per capita among the participating Member States. At national level, the Cards bring benefits mainly to individuals with mild disabilities who were not receiving benefits through the national legislation.

²⁹⁷ See at: <http://dizab.euocard.gov.ro/evenimente-la-nivel-national>.

Focus	Topic	Information
	National good/bad practices	<p>Good practices</p> <ul style="list-style-type: none"> • the DCNO tried to increase the attractiveness of the Card by advertising on the website national and international events where the Card could be used • very high coverage of public service providers <p>Bad practices</p> <ul style="list-style-type: none"> • insufficient efforts to attract the participation of private service providers; • infrequent updating of the national website; • ineffective advertisement of the Card.
	Financial consequences of the EDC mutual recognition	Through the Card, benefits are guaranteed also to individuals with mild disabilities, which were not covered by the national legislation. Additional data would be needed to assess the economic impact on the service providers participating in the Card.

9.8. Slovenia

Figure 34 - Key actors involved and activities performed

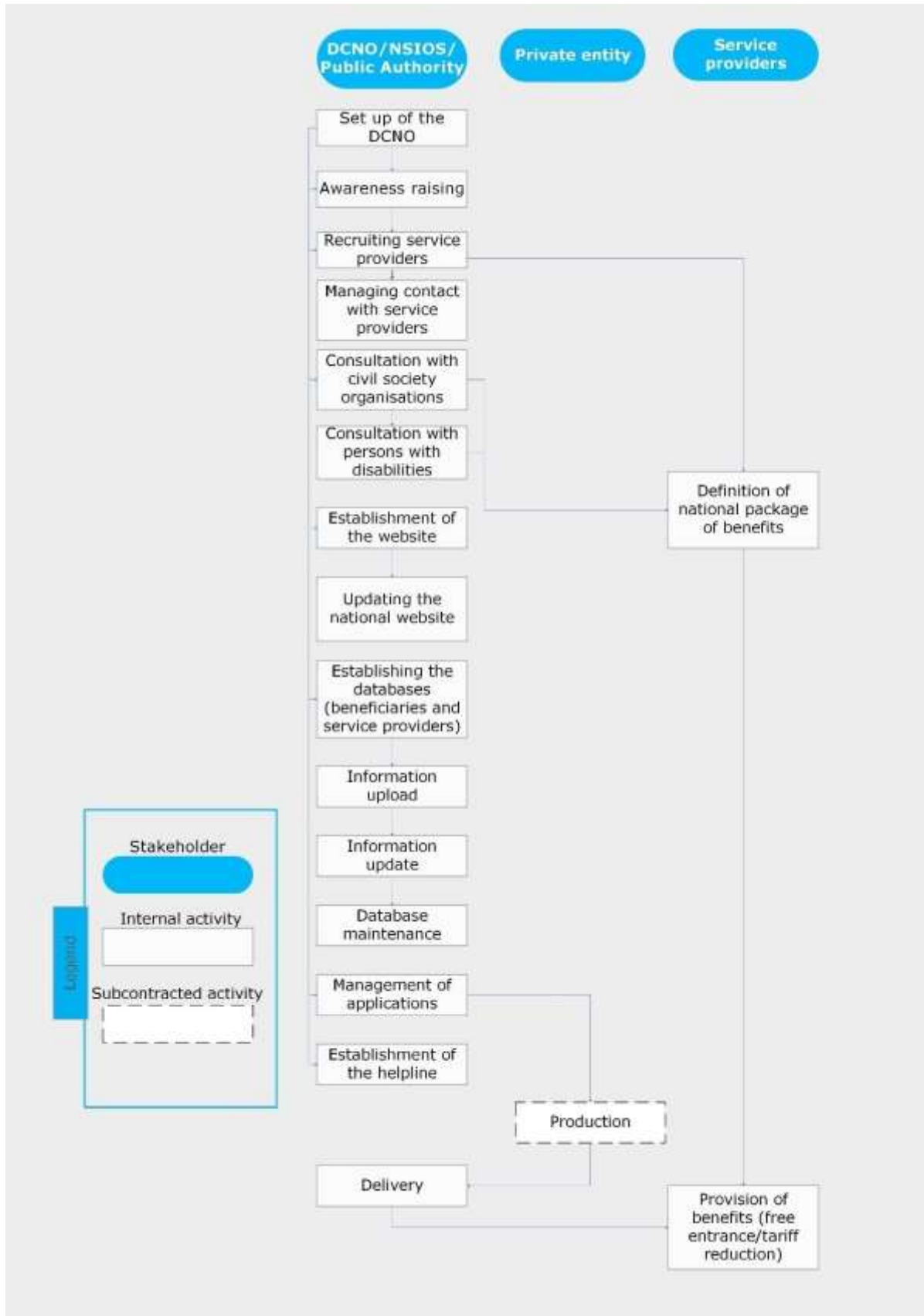


Table 42 - Country fiche: Slovenia

Focus	Topic	Information
Legal and policy background	Definition of disability	<p>Disability is recognised by means of a decision issued by an authority specified by law and based on the opinion of an expert body. An individual may exercise the rights defined in a regulation pursuant to a final or final legal decision. Slovenian legislation contains several differing definitions of disability that were produced at different times:</p> <ul style="list-style-type: none"> • The first five definitions adopt a “medical model”²⁹⁸ approach to disability and are focused on medical interventions that may diminish/correct disability, which is considered as a physical illness. • The latest legislative provisions (2002, 2010) introduced definitions derived from the human rights model to address the activities of persons with disability and their organisations and the active role of the state in the creation and adoption of CRPD, which was ratified in 2008. <p>All definitions have common elements:</p> <ul style="list-style-type: none"> • The individual’s health impairment shall be defined in terms of degree or duration, or merely expressed as a physical or mental disability • The disability status shall be recognised and granted by means of a procedure defined by law • The requirement for the health impairment to be correlated to an external event (e.g. disability may be the result of military or other duties undertaken for the defence and security of Slovenia or the result of circumstances associated with involvement in education or the labour market).
	Disability policies	<p>The disability policy is regulated by the Ministry of Labour, Family, Social Affairs and Equal Opportunities (MDDSZ), which regulates the national disability policy and provides financial and other forms of assistance to persons with disabilities²⁹⁹. The Action Programme for Persons with Disabilities 2014- 2021³⁰⁰ provides measures specifically aimed to promote the inclusion of persons with disabilities in a range of areas including, inter alia, cultural events, sport and leisure activities, education and employment. There is no National Disability Card.</p>
Organisational set-up	Legal basis	<p>The Card entered into force in July 2017. The main legislative provision on non-discrimination of persons with disabilities is the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette Nr. 94/10, 50/14 in 32/17)³⁰¹.</p>
	Governance scheme	<p>The Ministry of Labour, Family, Social Affairs and Equal Opportunities which represents the DCNO and the Ministry of Public Administration, responsible for the Administrative Units (i.e. administrative districts)³⁰² are the two institutions responsible for the implementation of the Card system and are issuing authorities. In addition, the National Council of Disabled People’s Organisation of Slovenia (NSIOS) plays a key role in the Card’s scheme.</p>

²⁹⁸ See at: http://www.edf-feph.org/sites/default/files/edf_interpretation_of_the_ecj_judgement.pdf.

²⁹⁹ See at: <https://www.gov.si/en/policies/social-security/persons-with-disabilities-war-veterans-and-victims-of-war/>.

³⁰⁰ Republic of Slovenia, *Action Programme for Persons with Disabilities 2014-2020*. Available at: https://www.gov.si/assets/ministrstva/MDDSZ/Invalidi/API-2014-2021/API_2014_2021_ANG.pdf

³⁰¹ See at: <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO4342>.

³⁰² See at: <https://www.gov.si/en/state-authorities/ministries/ministry-of-public-administration/about-the-ministry/administrative-units-service/>.

Focus	Topic	Information
	Recruiting and managing service providers	As of 2020, 216 service providers have participated in the Card system ³⁰³ . There was an agreement between the DCNO and NSIOS on the responsibility of NSIOS to recruit and manage contacts with service providers as well as to update the information in the national Card's website.
	Sustainability measures	The funding of the Card system is public, at national level. When the Card was launched in 2018, the EU funding had ended and mechanisms to ensure financial sustainability were not in place. No mechanisms have been established for funding the Card after exhausting the EU funding, and this represented a major problem.
	National website	The Card national website was established by NSIOS who is also responsible for updating and maintaining it. The website, which includes information on the benefits provided to cardholders, is available in accessible format. The website is updated every two-three months by NSIOS. Moreover, NSIOS established a mobile application, in accordance with accessibility standards, which persons with disabilities can use to find service providers participating in the Card.
	Consultation with stakeholders not directly involved in the Card's management	Both MDDSZ and NSIOS were responsible for consultations with civil society organisations and persons with disabilities. The consultations were carried out through meetings and focus groups to identify the national package of benefits.
Features of the system	Eligibility criteria	<p>Disability is recognised by means of a decision issued by an authority specified by law and based on the opinion of an expert body. An individual may exercise the rights defined in a regulation pursuant to a final legal decision. The decisions on the disability status must include the following common requirements:</p> <p>The individual's health impairment must be defined in terms of degree or duration, or merely expressed as a physical or mental disability; The health impairment must be placed in relation to an external event (e.g. disability may be the result of military or other duties undertaken for the defence and security of SI or the result of circumstances associated with involvement in education or the labour market).</p> <p>Persons eligible for the Card are citizens of the Republic of Slovenia with permanent residence in the Republic of Slovenia or foreigners with permanent residence in the Republic of Slovenia, and those with disabilities can apply for the Card namely:</p> <ul style="list-style-type: none"> • Persons with Disabilities I., II. and III. categories under the Pension and Disability Insurance Act. (all workers with disabilities - decisions based on Act) • Recognised physical impairment (PI): about 90% PI due to loss of vision, about 70% PI due to hearing loss or at least 80% PI, if the PI is cumulative and the minimum percentage for one PI is at least 70%. (Pension and Disability Insurance Act - physical impairment decisions) • Persons with disabilities according to the Vocational Rehabilitation and Employment of Disabled Persons Act (Decision by Employment Service of Slovenia). • Persons with a recognised disability status according to the Act Regulating the Training and Employment of Disabled Persons (Decision by Employment Service of Slovenia). • Persons with a status acquired under the Act Concerning Social Care of Mentally and Physically Handicapped Persons (Decisions by Centre for Social Work or rarely by Pension and Disability Insurance Institute of Slovenia). • Persons who have obtained the status of Persons with Disabilities according to the regulations of other Member States.

³⁰³ Data were retrieved from the Card's national website.

Focus	Topic	Information
	Databases of persons with disabilities, beneficiaries and service providers	<p>The databases with information on eligible persons and Cardholders were established by the DCNO which is also responsible for the uploading and updating of information, and the maintenance of the database. The database of beneficiaries provides information on beneficiaries' name and surnames, dates of birth, permanent addresses and current addresses.</p> <p>Database of service providers was established by the NSIOS. The database of service providers includes information on the contact person; their email address and telephone number; information about the accessibility of the service premises for persons using wheelchairs, for the blind, partially visually impaired, deaf and hard-of-hearing, persons with cognitive or intellectual disabilities; as well as working hours of the service provider, amount of discount for the goods or services, and a photograph and logo of company.</p>
	Application process	<p>Any person with disabilities can apply for the Card either online or in person in any of the 58 Administrative Units across the country by providing:</p> <ul style="list-style-type: none"> • Personal details and disability status confirmation (Name and surname, date of birth, ID picture, Card number, expiry date); • An application form; • Two photographs sized 3,5 x 4,5 cm. <p>The Administrative Authorities receive the data from official documents and electronic sources and process the application. Once they verify whether the applicant matches the eligibility criteria and the application is validated, the Administrative Units send the information to the company responsible for producing the Card. The beneficiary receives the Card in about ten to 15 days after submission of the application.</p> <p>The Administrative Units, under the direction of the Ministry of Public Administration, are responsible for assessing the eligibility criteria. There is no new assessment required, the Card is issued on the basis of the existent assessment of disability status.</p> <p>A helpline was established by the DCNO to provide support during the application process and the use of the Card.</p>
	Production	<p>The Card's production is outsourced to a private company selected through public procurement. The contract lasted from 2015 to 2017, and, during this period, the private entity printed 170,000 Cards corresponding to the overall number of persons with disabilities. Once the Card project was terminated, there was a stock of 170,000 Card, thus, the production was halted. The private entity continues printing the name of the Cardholders on the Cards. The Administrative Units are responsible for sending the data of beneficiaries to the private entity.</p> <p>The Cards are valid for ten years.</p> <p>The DCNO encountered some technical difficulties in printing the Card with Braille.</p> <p>Unit production costs per Card amounted to €0.93 per Card.</p>
	Delivery	<p>Overall, the number of Cards issued between July 2017 and December 2019 is 7,589.</p> <p>The Slovenia Postal Service is responsible for the Card's delivery, which is free of charge to the holders and financed by the DCNO.</p>
	Security mechanisms	<p>Pre-printed Cards incorporate microchips that protect them from fraud, unauthorised use of personal information, and duplication.</p> <p>In case of loss, the person with disability must come to an Administrative Unit and file a lost Card report. The procedure to receive a new Card is the same as when a person applies for the Card for the first time.</p>
	National package of benefits	<p>Data protection mechanisms are in place for all the three existing databases: eligible persons, beneficiaries and service providers.</p> <p>The Card provides benefits in the field of culture, leisure and sport. The public transport sector is expected to be covered as of July 2020. Coach and train transport operators are expected to be involved in the Card.</p> <p>In the field of cultural benefits, disability associations offer free use of their programmes. Publishing houses offer 5-10% discounts for the purchase of books, libraries offer 50 – 100% discounts on membership fees, and galleries and museums usually offer 20-50% discounts on entrance fees.</p> <p>Eleven hotels participated in the Card providing price reductions and free services.</p>

Focus	Topic	Information
		<p>In the field of sport benefits, 33 providers participated. Most of them are disability associations offering free use of their programmes. A few of them offer 5-20% discounts for use of wellness centres, a few others offer discounts. Only six strictly “sport” organisations participated, mostly public organisations and disability organisations. One ski centre offers free ski passes, but only for the blind and their assistants.</p> <p>Whether the Card confers benefits to the Assistants of persons with disabilities depends on the service provider. Assistants commonly had a discounted entrance fee to museums but rarely shared benefits at hotels or sports organisations for example.</p>
	Problems encountered with the use of the Card	<p>The Administrative Units and the NSIOS are in charge of handling complaints. The main problem for the use of the Card relates to the low awareness of service providers when beneficiaries show them the Card. Still not enough persons with disabilities are aware of the Card. Those without disabilities who know about the Card are mostly just friends and relatives of Cardholders.</p>
Awareness-raising	Awareness-raising activities	<p>The DCNO, in collaboration with the NSIOS, carried out promotional activities (press conference, public debate, brochures, communication campaigns, social media campaigns etc.) during the project to promote the Card. They had promotional material and prepared six events in major Slovenian cities with the help of persons with disabilities in Ljubljana, Kranj, Maribor, Koper and Murska Sobota and Novo mesto. The media supported enthusiastic and free press releases well as other activities such as presentations in smaller conferences, opening press conferences and other conferences. Promotional activities targeted persons with disabilities, civil society organisation and service providers.</p>
Results	Accessible tourism and better inclusion/Improved participation in travel/cultural and sporting events	<p>The DCNOs received some feedback from the beneficiaries travelling abroad who had positive experiences.</p> <p>While in the second survey in May 2020 service providers perceived several benefits of participating, increased visibility was not one of them. This should be addressed in the future to increase the satisfaction of service providers.</p> <p>The low response rates of Cardholders from SI do not allow to assess the perceived impact of the Card on the behaviours of persons with disabilities. However, service providers perceived that the Card fairly increased the number of persons with disabilities (national and foreign) accessing their services.</p>
	Social-economic benefits	<p>Service providers perceived that the benefits fully outweighed the costs.</p>
	National good practices	<p>The website allows beneficiaries to search for information according to the type of benefits and by place. Additionally, website users can browse Google maps, displaying service provider location in the country. Moreover, a mobile application is available for beneficiaries and can be downloaded directly from the website.</p>
	Financial consequences of the EDC mutual recognition	-

10. Mapping of service providers

10.1. Belgium³⁰⁴

Sector	Service provider	Benefits
Culture	Musées royaux d'Art et d'Histoire	Free entrance, free entrance for personal assistant
Culture	Musée des Egouts	Price reduction
Culture	Musée des Instruments de Musique - Muziekinstrumentenmuseum	Free entrance, free entrance for personal assistant
Culture	Musée Mode et Dentelle	Price reduction
Culture	Domaine du Château de Seneffe, Musée de l'orfèvrerie de la Fédération Wallonie-Bruxelles	Free entrance, discounted tablet
Culture	MiLL - Musée Ianchelevici La Louvière	Not found
Culture	Musée d'Art de la Province de Hainaut - BPS22	Not found
Culture	Musée de la Forêt et des Eaux	Free museum (without guide)
Culture	Musée de la Photographie	Price reduction
Culture	Musée de la Vie wallonne	Price reduction
Culture	Musée des Arts anciens du Namurois	Not found
Culture	Musée des Transports en commun de Wallonie	Not found
Culture	Musée du Marbre	Not found
Culture	Musée du Pays d'Ourthe-Amblève	Not found
Culture	Musée Félicien Rops	Free museum (without guide)
Culture	Musée L - Musée universitaire de Louvain	Price reduction
Culture	Musée royal de Mariemont	Price reduction
Culture	AfricaMuseum	Price reduction, price reduction for assistant
Culture	Bakkerijmuseum Veurne	Price reduction, free entrance 1 assistant x 5
Culture	Damiaanmuseum	Not found
Culture	Design Museum Gent	Free entrance for personal assistant

³⁰⁴ As the list of benefits was not available on the national Card's website, in some cases details on the benefits offered by each service provider could not be retrieved.

Sector	Service provider	Benefits
Culture	Gallo-Romeins Museum	Price reduction, free entrance for personal assistant
Culture	Hopmuseum Poperinge	Not found
Culture	In Flanders Fields Museum	Price reduction for assistant
Culture	Industriemuseum	Free entrance for personal assistant
Culture	Jenevermuseum	Not found
Culture	Käthe Kollwitz Museum - Fransmansmuseum	Not found
Culture	KOERS. Museum van de Wielersport & Toerisme Roeselare	Price reduction, free entrance for personal assistant
Culture	M - Museum Leuven	Free entrance for personal assistant
Culture	Modemuseum Hasselt	Not found
Culture	MOU - Museum van Oudenaarde en de Vlaamse Ardennen	Price reduction
Culture	Museum aan de IJzer	Price reduction
Culture	Museum Torhouts Aardewerk	Price reduction
Culture	Museum voor Schone Kunsten Gent (MSK)	Free entrance for personal assistant
Culture	Nationaal Tabaksmuseum	Free entrance for personal assistant
Culture	Provinciaal Archeologisch Museum (PAM)	Not found
Culture	Romeins Archeologisch Museum Oudenburg	Price reduction, free entrance for personal assistant
Culture	Speelgoedmuseum Mechelen VZW	Not found
Culture	Stadsmuseum Lier	Price reduction, free entrance for personal assistant
Culture	Vlaams Tram- en Autobusmuseum	Price reduction
Culture	Musée des Instruments de Musique - Muziekinstrumentenmuseum	Free entrance, free entrance for personal assistant
Culture	Stripmuseum / Centre Belge de la Bande Dessinée	Price reduction, free entrance for personal assistant
Culture	Bastogne War Museum	Price reduction
Culture	Cultuurcentrum Achterolmen	Not found
Culture	Cultuurcentrum Belgica	Not found
Culture	Cultuurcentrum casino Houthalen	Free entrance for personal assistant
Culture	Cultuurcentrum De Abdij	Not found
Culture	Cultuurcentrum De Adelberg	Not found
Culture	Cultuurcentrum de borre	Free entrance for personal assistant

Sector	Service provider	Benefits
Culture	Cultuurcentrum Hasselt	Free entrance for personal assistant
Culture	Cultuurcentrum Knokke-Heist	Not found
Culture	Cultuurcentrum Palethe	Free entrance for personal assistant
Culture	Cultuurcentrum Strombeek	Free entrance for personal assistant
Culture	Gemeente Brasschaat - cultuurcentrum	Not found
Culture	Cultureel Centrum Lanaken	Free entrance for personal assistant
Culture	Cultuurhuis de Warande	Price reduction
Culture	Cultuurpromotie vzw (OC de Djoelen)	Not found
Culture	Gemeente en OCMW Kortemark	Price reduction
Culture	Gemeente Haacht	Price reduction
Culture	Gemeente Haacht - GC Den Breughel	Price reduction
Culture	Gemeente Haacht - Jeugd en Welzijn	Price reduction
Culture	Gemeente Heusden-Zolder	Free entrance for personal assistant
Culture	Gemeente Oudsbergen	Free entrance for personal assistant
Culture	Gemeente Sint-Laureins	Price reduction
Culture	Gemeentebestuur Opglabbeek	Free entrance for personal assistant
Culture	Gemeentebestuur Zulte	Price reduction
Culture	Gemeentebestuur Zwalm	Price reduction
Culture	Provinciaal Archeocentrum Velzeke	Price reduction
Culture	Lokaal Bestuur Kontich	Price reduction, free entrance for personal assistant
Culture	Lokaal bestuur Machelen	Price reduction
Culture	Lokaal bestuur Ninove	Price reduction
Culture	Musea Brugge	Not found
Culture	Musea Stad Maaseik	Price reduction, free entrance for personal assistant
Culture	Stedelijke musea Kortrijk	Not found
Culture	Koninklijke Musea voor Kunst en Geschiedenis	Free entrance, free entrance for personal assistant
Culture	Stad Beringen	Price reduction, free entrance for personal assistant
Culture	Stad Damme	Price reduction

Sector	Service provider	Benefits
Culture	Stad Halen	Price reduction
Culture	Kasteel d'Ursel	Not found
Culture	Kasteel van Gaasbeek	Price reduction, free entrance for personal assistant
Culture	Kasteel van Wijnendale	Price reduction
Culture	Projet Interquartier - Centre culturel de Jette	Not found
Culture	Centre Culturel Action-Sud	Not found
Culture	Centre culturel de Bièvre	Not found
Culture	Centre culturel de Stavelot-Trois-Ponts	Not found
Culture	Centre Culturel de Welkenraedt	Not found
Culture	Theater Malpertuis	Not found
Culture	Theater Tinnenpot	Not found
Culture	Kaaitheater	Price reduction
Culture	Openbare Bibliotheek Lanaken	Not found
Culture	Stadsbibliotheek Tienen	Free entrance for personal assistant
Culture	Koninklijke Bibliotheek van België	Free entrance, free entrance for personal assistant
Culture	30CC	Free entrance for personal assistant
Culture	AGB CC Diest	Free entrance for personal assistant
Culture	BICC Peer	Not found
Culture	CC de Bogaard	Not found
Culture	cc de borre	Not found
Culture	CC de Brouckere	Price reduction
Culture	CC De Factorij	Not found
Culture	CC De Kruisboog	Free entrance for personal assistant
Culture	CC de Meent	Free entrance for personal assistant
Culture	Théâtre de la Vie	Not found
Culture	Théâtre Océan Nord	Price reduction
Culture	Belevingscentrum '14-'18	Not found
Culture	Bokrijk	Price reduction

Sector	Service provider	Benefits
Culture	Bruges beer experience	Not found
Culture	C-mine-expeditie	Price reduction
Culture	Comics Station Antwerp	Not found
Culture	De Steenoven	Not found
Culture	De Velinx	Not found
Culture	The World of Kina: the Garden	Price reduction, price reduction for assistant
Culture	The World of Kina: the House	Price reduction, price reduction for assistant
Culture	DIVA, Home of Diamonds	Free entrance for personal assistant
Culture	Heritage Site Tienen	Not found
Culture	Ethias Arena - Hasselt Expo	Not found
Culture	Fort Liefkenshoek	Free entrance for all
Culture	Fort Napoleon	Not found
Culture	GC Zedelgem	Not found
Culture	Ghent-Authentic	Not found
Culture	Gravensteen	Free entrance for personal assistant
Culture	Handelsbeurs Concertzaal	Price reduction, price reduction for assistant
Culture	Het MOT	Free entrance, free entrance for personal assistant
Culture	Het Stadsmus Hasselt	Free entrance for all
Culture	Hidrodoe	Price reduction
Culture	Huis van Alijn	Free entrance for personal assistant
Culture	Koninklijk Conservatorium Antwerpen	Not found
Culture	Kursaal Oostende	Not found
Culture	MAS	Free entrance for personal assistant
Culture	Musica, Impulse Center for Music	Free entrance for personal assistant
Culture	Muziekcentrum De Bijloke	Not found
Culture	NT Gent	Price reduction, price reduction for assistant
Culture	OC De Witte Merel	Not found
Culture	Opera Ballet Vlaanderen	Price reduction

Sector	Service provider	Benefits
Culture	pam Ename	Free entrance
Culture	SMAK	Free entrance for personal assistant
Culture	Schouwburg Kortrijk	Price reduction, free entrance for personal assistant
Culture	Siha Salons Automobiles BVBA	Not found
Culture	Sint-Pietersabdij	Free entrance for personal assistant
Culture	Stichting Logos	Not found
Culture	t Grom	Free entrance for personal assistant
Culture	Teseum	Free entrance for personal assistant
Culture	The Phoebus Foundation Pikant	Free entrance, free entrance for personal assistant
Culture	Vooruit	Price reduction
Culture	Algemeen Rijksarchief en Rijksarchief in de Provinciën	Not found
Culture	Asbl E ²	Not found
Culture	Comédie Volter	Not found
Culture	Comédie Volter	Not found
Culture	Experience.brussels	Free entrance for all
Culture	GardeRobe Mannekenpis	Not found
Culture	Kanal - Centre Pompidou	Not found
Culture	Kunstenfestivaldesarts	Not found
Culture	La Maison du Livre asbl	Not found
Culture	Les Ateliers de la Chaise Musicale	Price reduction
Culture	Maison du Roi	Price reduction
Culture	Maison du Roi	Price reduction
Culture	Porte de Hal - Hallepoort	Not found
Culture	Train World	Price reduction, price reduction for assistant
Culture	War Heritage Institute	Not found
Culture	Abbaye de Stavelot	Not found
Culture	Abbaye de Villers	Free entrance
Culture	Administration communale de Berloz	Price reduction

Sector	Service provider	Benefits
Culture	Archéoscope de Bouillon	Not found
Culture	Blegny-Mine	Not found
Culture	Centre de la Gravure et de l'Image imprimée	Price reduction
Culture	Cercle Culturel Belgo Polonais de Charleroi asbl	Price reduction
Culture	Château fort de Bouillon	Not found
Culture	Chudoscnik Sunergia	Not found
Culture	Collégiale Saint-Barthélemy - Liège	Not found
Culture	Eden Centre Culture de Charleroi	Not found
Culture	Espace Arthur Masson asbl	Not found
Culture	Espace Chimay	Not found
Culture	La maison des plantes médicinales	Not found
Culture	Le Bois du Cazier - Marcinelle	Price reduction
Culture	Le Grand-Hornu	Not found
Culture	Maison du Tourisme du Pays de Herve	Not found
Culture	Maison du Tourisme du Pays de Vesdre	Not found
Culture	Maison Losseau	Not found
Culture	Mundaneum	Not found
Culture	Office du tourisme de Bièvre	Not found
Culture/Sport	Stad Deinze	Free entrance or price reduction
Culture/Sport	Stad Tielt	Free entrance or price reduction
Leisure	Cinema Albert	Not found
Leisure	Cinema Koksijde	Price reduction
Leisure	Cinema Plaza (GC Duffel)	Not found
Leisure	Sphinx Cinema	Price reduction
Leisure	Z33 - zebracinema	Not found
Leisure	Cinema Galeries	Price reduction
Leisure	Gemeente Wingene	Price reduction, free entrance for personal assistant
Leisure	Gemeentebestuur Meulebeke	Free entrance or price reduction

Sector	Service provider	Benefits
Leisure	Gemeentebestuur Wevelgem	Free entrance for personal assistant
Leisure	Gemeentebestuur Wuustwezel	Price reduction
Leisure	Provinciaal domein De Gavers	Price reduction
Leisure	Provinciaal domein De Ster	Price reduction
Leisure	Lokaal Bestuur Geraardsbergen	Price reduction
Leisure	LAGO Beveren De Meerminnen	Price reduction
Leisure	LAGO Brugge Olympia	Price reduction
Leisure	LAGO CLUB Zwevegem Fit.	Price reduction
Leisure	LAGO Gent Rozebroeken	Price reduction
Leisure	LAGO KORTRIJK WEIDE	Price reduction, free entrance for personal assistant
Leisure	LAGO Lier De Waterperels	Price reduction
Leisure	LAGO Pelt Dommelslag	Price reduction
Leisure	LAGO Eupen Wetzlarbad	Price reduction
Leisure	LAGO Mons Piscine du Grand Large	Not found
Leisure	Stad Tienen (zwembad)	Free entrance for personal assistant
Leisure	Zwembad Bilzen	Price reduction, price reduction for personal assistant
Leisure	Zwembad De Motte	Price reduction, price reduction for personal assistant
Leisure	Zwembad De Warande	Not found
Leisure	Zwembad De Wauwer Meise	Free entrance
Leisure	Zwembad Den Bessem	Price reduction, free entrance for personal assistant
Leisure	Zwembad Geerdegemvaart	Price reduction
Leisure	Zwembad Izegem	Price reduction
Leisure	Zwembad Olympos Dendermonde	Price reduction, price reduction for personal assistant
Leisure	Zwembad Oostende	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction

Sector	Service provider	Benefits
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Kinapolis	Price reduction
Leisure	Stad Diest	Free entrance for personal assistant
Leisure	Stad Nieuwpoort	Price reduction
Leisure	Agentschap Plantentuin Meise	Price reduction, free entrance for personal assistant
Leisure	Bellewaerde	Free entrance for personal assistant
Leisure	Bezoekerscentrum Hageven	Not found
Leisure	Birre's Camper Friends	Free entrance
Leisure	Bobbejaanland bvba	Price reduction, free entrance for 1 assistant for 15
Leisure	Boudewijn Seapark	Not found
Leisure	Center Parcs De Vossemereen	Not found
Leisure	Center Parcs Erperheide	Not found
Leisure	Center Parcs Les Ardennes	Not found
Leisure	Connecterra	Not found
Leisure	Cosmodrome	Price reduction only for group
Leisure	Klein Strand Jabbeke	Not found
Leisure	EM Klein Strand NV	Not found
Leisure	Euro Coop Maasmechelen	Not found
Leisure	Japanse Tuin Hasselt	Price reduction, free entrance for personal assistant
Leisure	LABIOMISTA	Price reduction, price reduction for assistant
Leisure	Olmense Zoo	Price reduction
Leisure	Planckendael	Price reduction, price reduction for assistant
Leisure	Plopsa Indoor Hasselt	Price reduction, free entrance for personal assistant

Sector	Service provider	Benefits
Leisure	Plopsaland	Price reduction, free entrance for personal assistant
Leisure	Plop Aqua	Price reduction, free entrance for personal assistant
Leisure	Raversyde	Not found
Leisure	Romantische Tuin Dina Deferme	Not found
Leisure	SEA LIFE Blankenberge	Free entrance for personal assistant
Leisure	Serpentarium Blankenberge	Price reduction, price reduction for assistant
Leisure	Siniscoop	Not found
Leisure	Studio Skoop	Price reduction
Leisure	Sunparks De Haan	Not found
Leisure	Sunparks Oostduinkerke	Not found
Leisure	Sunparks Kempense Meren	Not found
Leisure	Tweedaagse Blankenberge	Not found
Leisure	Vakantieverblijf Middelpunt	Free amenities
Leisure	VZW De Zonnegloed	Price reduction
Leisure	Zandsculpturenfestival Oostende	Price reduction
Leisure	ZOO Antwerpen	Price reduction, price reduction for assistant
Leisure	Zwin Natuur Park	Free entrance for personal assistant
Leisure	La Tricoterie	Not found
Leisure	Planétarium de Bruxelles	Not found
Leisure	Wolu 10 000 Asbl	Price reduction, free entrance for personal assistant
Leisure	Groepsaccommodatie "Le Mont Saint Jacques"	Not found
Leisure	Karting Eupen	Not found
Leisure	Monde Sauvage Safari Parc	Not found
Leisure	Pairi Daiza	Not found
Leisure	Parc Chlorophylle	Not found
Leisure	Parc de Furfooz	Not found
Leisure	Plopsa Coö	Price reduction, free entrance for personal assistant
Leisure	Quai10	Not found

Sector	Service provider	Benefits
Leisure	L'Ancre Bleue asbl	Not found
Leisure	Gemeente Beveren	Price reduction
Services	Gemeente Berlare	Price reduction
Sport	Gemeente Brasschaat - sportdienst	Not found
Sport	Gemeente Haacht - Sport	Not found
Sport	Gemeente Hooglede - sportdienst	Not found
Sport	Optisport De Soeverein	Not found
Sport	Provinciaal Sport- en Recreatiecentrum De Nekker	Not found
Sport	Sport Vlaanderen Blankenberge	Not found
Sport	Sport Vlaanderen Blankenberge	Not found
Sport	Sport Vlaanderen Brasschaat	Not found
Sport	Sport Vlaanderen Brasschaat	Not found
Sport	Sport Vlaanderen Brugge	Not found
Sport	Sport Vlaanderen Genk	Not found
Sport	Sport Vlaanderen Hasselt	Price reduction
Sport	Sport Vlaanderen Herentals	Not found
Sport	Sport Vlaanderen Herentals	Not found
Sport	Sport Vlaanderen Hofstade	Not found
Sport	Sport Vlaanderen Hofstade	Not found
Sport	Sport Vlaanderen Liedekerke	Price reduction
Sport	Sport Vlaanderen Liedekerke	Price reduction
Sport	Sport Vlaanderen Nieuwpoort	Not found
Sport	Sport Vlaanderen Oordegem	Not found
Sport	Sport Vlaanderen Waregem	Not found
Sport	Sport Vlaanderen Willebroek	Not found
Sport	Sport Vlaanderen Woumen	Not found
Sport	Sport Vlaanderen Gent	Not found
Sport	Sportcentrum Nijlen - publiek overdekt zwembad	Not found

Sector	Service provider	Benefits
Sport	Sportdienst Geraardsbergen	Not found
Sport	Sportdienst Oud-Turnhout	Not found
Sport	Sportimonium	Price reduction, price reduction for assistant
Sport	Sportoase Be-Mine	Not found
Sport	Sportoase De Lijster Londerzeel	Not found
Sport	Sportoase De Lo	Not found
Sport	Sportoase Duinenwater	Not found
Sport	Sportoase Eburons Dome Tongeren	Not found
Sport	Sportoase Elshout	Not found
Sport	Sportoase Hallebad	Not found
Sport	Sportoase Montaignehof	Not found
Sport	Sportoase Philipssite	Not found
Sport	Sportoase Schiervelde Roeselare	Not found
Sport	Sportoase Ter Heide	Not found
Sport	Sportoase Veldstraat	Not found
Sport	Sportoase Wilssele-Putkapel	Not found
Sport	Sportoase Zwem.com Oudenaarde	Not found
Sport	Sportpaleis Antwerpen	Not found
Sport	Association sportive Flobecq-Ellezelles	Not found
Sport	Centre sportif des Ascenseurs	Not found
Sport	Centre sportif d'Oline	Not found
Sport	Basketbalclub Filou Oostende	Not found
Sport	Cercle Brugge	Not found
Sport	Circuit Zolder	Not found
Sport	Club Brugge	Not found
Sport	Gitse Batmintonclub	Not found
Sport	Good Shape Health and Fitness Center	Not found
Sport	Judoclub Jenos Kwai	Not found

Sector	Service provider	Benefits
Sport	Koninklijke Racing Club Mechelen	Not found
Sport	Paracycling	Not found
Sport	Sven Cycling Center	Not found
Sport	TC Onledemolen	Not found
Sport	TODI nv	Not found
Sport	VSV Knack Volley Roeselare	Not found
Sport	Damoclès asbl	Not found
Sport	Joso, asbl	Not found
Sport	Koninklijke Belgische Voetbalbond (KBVB) / Union belge de football (URBSFA)	Not found
Sport	Koninklijke de Vrolijke Kruisboogschutters-La Renaissance	Not found
Sport	La Maison de l'Escrime	Not found
Sport	Royale Saint-Gilloise ASBL	Not found
Sport	Schaken Schaakclub Excelsior Ganshoren	Not found
Sport	Aïkido Club - Satori	Not found
Sport	Handballclub Eynatten-Raeren	Not found
Sport	Les Bons Tireus d'Seuris - Compagnie d'Arc de Sambreville	Not found
Sport	Skiclub Manderfeld	Not found
Other ³⁰⁵	Gemeente Arendonk	Not found
Other	Gemeente Beersel	Not found
Other	Gemeente Begijnendijk	Not found
Other	Gemeente Boom vrijetijdsdiensten	Not found
Other	Gemeente Brasschaat - bibliotheek	Not found
Other	Gemeente Brasschaat - jeugddienst	Not found
Other	Gemeente en OCMW Ingelmunster	Not found
Other	Gemeente en OCMW Zemst	Not found
Other	Gemeente en OCMW Zoersel	Not found
Other	Gemeente Erpe-Mere	Not found

³⁰⁵ The «Other» sector includes municipalities, civil society organisations, accessibility experts, and various services not in scope.

Sector	Service provider	Benefits
Other	Gemeente Essen	Not found
Other	Gemeente Haaltert	Not found
Other	Gemeente Horebeke	Not found
Other	Gemeente Laarne	Not found
Other	Gemeente Leopoldsburg	Not found
Other	Gemeente Lierde	Not found
Other	Gemeente Lille	Not found
Other	Gemeente Londerzeel	Not found
Other	Gemeente Maarkedal	Not found
Other	Gemeente Malle	Not found
Other	Gemeente Melle	Not found
Other	Gemeente Merchtem	Not found
Other	Gemeente Oostrozebeke	Not found
Other	Gemeente Opwijk - Welzijnsraad	Not found
Other	Gemeente Overijse	Not found
Other	Gemeente Schilde	Not found
Other	Gemeente Schoten / vrijetijdsdiensten	Not found
Other	Gemeente Voeren	Not found
Other	Gemeente Westerlo	Not found
Other	Gemeente Wielsbeke	Not found
Other	Gemeente Wortegem-Petegem	Not found
Other	Gemeente Zedelgem	Not found
Other	Gemeente Zwijndrecht	Not found
Other	Gemeentebestuur Moerbeke	Not found
Other	Gemeentebestuur Bredene	Not found
Other	Gemeentebestuur Glabbeek	Not found
Other	Gemeentebestuur Herselt	Not found
Other	Gemeentebestuur Kampenhout	Not found

Sector	Service provider	Benefits
Other	Gemeentebestuur Kasterlee	Not found
Other	Gemeentebestuur Lebbeke	Not found
Other	Gemeentebestuur Liedekerke	Not found
Other	Gemeentebestuur Maldegem	Not found
Other	Gemeentebestuur Riemst	Not found
Other	Gemeentebestuur Zele - AGB Zele	Not found
Other	Algemeen Stedelijk Ziekenhuis - Aalst	Not found
Other	Algemeen Stedelijk Ziekenhuis - Geraardsbergen	Not found
Other	Algemeen Stedelijk Ziekenhuis - Wetteren	Not found
Other	Jessa Ziekenhuis Campus Sint-Ursula	Not found
Other	Jessa Ziekenhuis Campus Virga Jesse	Not found
Other	Jessa Ziekenhuis	Not found
Other	OLV Ziekenhuis Aalst-Asse-Ninove	Not found
Other	Provinciaal Domein Dommelhof	Not found
Other	Provinciaal domein Het Leen	Price reduction
Other	Provinciaal Domein Kesselse Heide	Not found
Other	Provinciaal groendomein De Averegeten	Not found
Other	Provinciaal Groendomein Hertberg	Not found
Other	Provinciaal groendomein Hof van Leysen	Not found
Other	Provinciaal groendomein Hoge Mouw	Not found
Other	Provinciaal groendomein Prinsenpark	Not found
Other	Provinciaal groendomein Rivierenhof	Not found
Other	Provinciaal groendomein Vrieselhof	Not found
Other	Provinciaal groendomein Vrijbroekpark	Not found
Other	Provinciaal Recreatiedomein De Schorre	Not found
Other	Provinciaal Recreatiedomein Zilvermeer	Free entrance, free entrance for personal assistant
Other	Lokaal bestuur Dessel	Not found
Other	Lokaal bestuur Gavere	Not found

Sector	Service provider	Benefits
Other	Lokaal bestuur Grimbergen	Not found
Other	Lokaal Bestuur Heist-op-den-Berg	Not found
Other	Lokaal bestuur Huldenberg	Not found
Other	Lokaal Bestuur Kurne	Not found
Other	Lokaal bestuur Maldegem	Not found
Other	Lokaal bestuur Nazareth	Not found
Other	Lokaal Bestuur Stabroek	Not found
Other	Stad Lommel	Not found
Other	Stad Sint-Truiden	Not found
Other	Provinciedomein Halve Maan Diest	Not found
Other	Provinciedomein Het Vinne Zoutleeuw	Not found
Other	Provinciedomein Huizingen	Price reduction
Other	Provinciedomein Kessel-Lo	Not found
Other	4 Example vzw	Not found
Other	André Demedtshuis vzw	Free museum
Other	Arboretum Kalmthout evap vzw	Free entrance for personal assistant
Other	Concertorganisatie vzw Lyrica	Not found
Other	Dansschool Excess Vzw	Not found
Other	FIBROVEERKE VZW	Not found
Other	Het Aksent vzw	Not found
Other	Isomundo vzw	Not found
Other	Kamelego vzw	Not found
Other	KTg Uilenspiegel vzw	Not found
Other	Kunststichting Perspektief vzw	Not found
Other	Paulusfeesten vzw	Not found
Other	Vespa Club Oostende vzw	Not found
Other	Africa's Sunshine vzw	Not found
Other	Atomium vzw	Price reduction

Sector	Service provider	Benefits
Other	ARhus	Not found
Other	AZ Maria Middelaes Gent	Not found
Other	AZ Sint-Blasius	Not found
Other	C-mine	Not found
Other	De Markthallen	Not found
Other	The Carriage House Community Center	Not found
Other	Inter - Toegankelijk Vlaanderen	Not found
Other	Jeugddienst Tienen	Not found
Other	Johan Verhoeven	Not found
Other	LDC 't Plein	Price reduction
Other	Idc Zilverpand	Price reduction
Other	LDC Zonnebloem	Price reduction
Other	Sociaal Huis	Not found
Other	Sociaal Huis	Not found
Other	Stadsbestuur Izegem	Not found
Other	Technopolis	Price reduction, free entrance for personal assistant
Other	Vlaams Agentschap voor Pesonen met een Handicap	Not found
Other	Vrij Vaderland	Not found
Other	Center "Malou Seniors"	Not found
Other	Centre civique de Kapelleveld asbl	Not found
Other	Centre de promotion pour Personnes handicapées - CPPH	Not found
Other	Cultureghem	Not found
Other	Cultureghem	Not found
Other	Werkgroep Ontwikkelings-samenwerking Oudergem	Not found
Other	Administration communale de Chièvres	Not found
Other	Administration communale de Honnelles	Not found
Other	Commune de Manage	Not found
Other	Commune de Seneffe	Not found

Sector	Service provider	Benefits
Other	CPAS de Flémalle	Not found
Other	Domaine des Grottes de Han	Price reduction
Other	Domaine provincial de Wégimont	Not found
Other	Gemeindeverwaltung Büllingen	Not found
Other	Ville de Comines-Warneton	Not found
Other	Ville de Hannu	Not found
Total: 474		

10.2. Cyprus

Sector	Service providers	Benefits
Culture	“Cypria” International Festival	Free entrance for Cardholders and price reduction for their assistant
Culture	Cyprus Museum, Nicosia	Free entrance for Cardholders and price reduction for their assistant
Culture	Limassol District Archaeological Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Larnaca District Archaeological Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Pafos District Archaeological Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Ethnological Museum (House of Hadjigeorgakis Komesios), Nicosia	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Archaeological Museum, Ancient City of Idalium	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Ethnological Museum of Traditional Embroidery and Silversmith-work, Lefkara	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Ethnological Museum, Fikardou	Free entrance for Cardholders and price reduction for their assistant
Culture	Cyprus Medieval Museum (Limassol Castle)	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Kourion Archaeological Museum (Episkopi)	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Archaeological Museum – Palaipafos, Kouklia	Free entrance for Cardholders and price reduction for their assistant
Culture	Folk Art Museum, Geroskipou	Free entrance for Cardholders and price reduction for their assistant
Culture	Local Museum of Marion-Arsinoe, Polis Chrysochous	Free entrance for Cardholders and price reduction for their assistant
Culture	Maa – Palaiokastros Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Larnaca Castle	Free entrance for Cardholders and price reduction for their assistant
Culture	Pafos Castle	Free entrance for Cardholders and price reduction for their assistant
Culture	Kolossi Castle	Free entrance for Cardholders and price reduction for their assistant

Sector	Service providers	Benefits
Culture	Limassol Castle (Cyprus Medieval Museum)	Free entrance for Cardholders and price reduction for their assistant
Culture	Khirokitia	Free entrance for Cardholders and price reduction for their assistant
Culture	Palaipafos (Kouklia)	Free entrance for Cardholders and price reduction for their assistant
Culture	Nea Pafos	Free entrance for Cardholders and price reduction for their assistant
Culture	Tamassos	Free entrance for Cardholders and price reduction for their assistant
Culture	Kition	Free entrance for Cardholders and price reduction for their assistant
Culture	Kalavastos -Tenta	Free entrance for Cardholders and price reduction for their assistant
Culture	Amathunta	Free entrance for Cardholders and price reduction for their assistant
Culture	Palepafos (Kouklia)	Free entrance for Cardholders and price reduction for their assistant
Culture	Nea Pafos	Free entrance for Cardholders and price reduction for their assistant
Culture	The Tombs of the Kings	Free entrance for Cardholders and price reduction for their assistant
Culture	Maa – Palaiokastros	Free entrance for Cardholders and price reduction for their assistant
Culture	Agios Georgios Pegeias	Free entrance for Cardholders and price reduction for their assistant
Culture	Kourion	Free entrance for Cardholders and price reduction for their assistant
Culture	Icons House of Saint Ioannis Lampadistis Holy Monastery	Free entrance for Cardholders and price reduction for their assistant
Culture	Hambis Printmaking Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Cyprus Motor Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Cyprus Theatre Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Cyprus Medical Museum	Free entrance for Cardholders and price reduction for their assistant

Sector	Service providers	Benefits
Culture	Pierides Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Kallinikeio Municipal Museum of Athienou	Free entrance for Cardholders and price reduction for their assistant
Culture	Pafos Ethnological Museum	Free entrance for Cardholders and price reduction for their assistant
Culture	Deryneia Municipal Museums	Free entrance for Cardholders and price reduction for their assistant
Culture	State Gallery of Cypriot Contemporary Art	Free entrance for Cardholders and price reduction for their assistant
Culture	A. G. Leventis Gallery	Free entrance for Cardholders and price reduction for their assistant
Culture	THOC performances	Free entrance for Cardholders and price reduction for their assistant
Leisure	Local Authorities (Municipal and Community Authorities)	Free or reduced entrance for Cardholders
Sport	Cyprus Sports Organization (CSO)	Free entrance for Cardholders and their assistant
Transport ³⁰⁶	Ministry of Transport, Communications and Works	50% price reduction for EDC holders and their assistant
Total: 47		

³⁰⁶ The Ministry of Transport, Communications and Works has been added here since it is included in the Card's national website. However, consultation with stakeholders clarified that only private transport operators are covered by the Card in CY.

10.3. Finland³⁰⁷

Sector	Service provider	Benefit
Culture	Alvar Aalto -museo	free entrance for personal assistant
Culture	Apteekkimuseo ja Qwenselin talo	not found
Culture	Ateneumin taidemuseo	not found
Culture	Biologinen museo	not found
Culture	Helsingin kaupunginmuseo	not found
Culture	Käsityömuseo Miila	free entrance for personal assistant
Culture	Kauhavan puukko- ja tekstiilimuseo	not found
Culture	Kuopion korttelimuseo	not found
Culture	Kuopion museo	not found
Culture	Kuopion taidemuseo	not found
Culture	Lapin Metsämuseo	not found
Culture	Luostarinmäen käsityöläismuseo	not found
Culture	Museokeskus Vapriikki	free entrance for personal assistant
Culture	Nykytaiteen museo Kiasma	free entrance for personal assistant
Culture	Paimio Sähkämuseo	free entrance for personal assistant
Culture	Porin taidemuseo	free entrance for personal assistant
Culture	Rauman merimuseo	free entrance for personal assistant
Culture	RIISA – Ortodoksinen kirkkomuseo	not found
Culture	Salon elektroniikkamuseo	not found
Culture	Salon Taidemuseo Veturitalli	free entrance for personal assistant
Culture	Suomen Ilmailumuseo	free entrance for personal assistant
Culture	Suomen Ilmavoimamuseo	free entrance for personal assistant
Culture	Suomen jääkärimuseo	not found
Culture	Suomen käsityön museo	free entrance for personal assistant

³⁰⁷ As the list of benefits was not available on the national Card's website, in some cases details on the benefits offered by each service provider could not be retrieved.

Sector	Service provider	Benefit
Culture	Turun taidemuseo	free entrance for personal assistant
Culture	Wäinö Aaltosen museo	not found
Culture	Solar Sound Festival	free entrance for personal assistant
Culture	Jurassic Rock Festival	not found
Culture	Kaustinen Folk Music Festival	not found
Culture	Wanaja Festival	free entrance for personal assistant
Culture	We Love Festival	not found
Culture	Iskelmä Festivaali	free entrance for personal assistant
Culture	Jysäri Festivaali	free entrance for personal assistant
Culture	Rauma Festivo	not found
Culture	South Park -festivaali	not found
Culture	Summer Up Festivaali	not found
Culture	Suomipop Festivaali	not found
Culture	Suomipop Festivaali	not found
Culture	Tammerfest	free entrance for personal assistant
Culture	Urkuyö ja Aaria -festivaali	free entrance for personal assistant
Culture	Ylisfestarit	not found
Culture	Elokuvateatteri Altin sali	free entrance for personal assistant
Culture	Elokuvateatteri Lumo	free entrance for personal assistant
Culture	Hämeenlinnan Teatteri	not found
Culture	Hämeenlinnan Uusi Kesäteatteri	free entrance for personal assistant
Culture	IN-teatteri	not found
Culture	Jyväskylän Huoneteatteri	not found
Culture	Jyväskylän kaupunginteatteri	free entrance for personal assistant
Culture	Kemin kaupunginteatteri	not found
Culture	Koljonvirta teatteri	free entrance for personal assistant
Culture	Kotkan Kaupunginteatteri	not found
Culture	Kouvolan Teatteri	not found

Sector	Service provider	Benefit
Culture	Kuopion kaupunginteatteri	free entrance for personal assistant
Culture	Kuusan Kanavateatteri	not found
Culture	Lahden kaupunginteatteri	not found
Culture	Lappeenrannan kaupunginteatteri	free entrance for personal assistant
Culture	Nilsin Harrastajateatteri	not found
Culture	Oulun kaupunginteatteri	not found
Culture	Rovaniemen Teatteri	not found
Culture	Ryhmäteatteri	free entrance for personal assistant
Culture	Salon Teatteri	free entrance for personal assistant
Culture	Sotku-teatteri	not found
Culture	Tanssiteatteri Raatikko	free entrance for personal assistant
Culture	Teatteri Hevosenkenkä	free entrance for personal assistant
Culture	Teatteri Jurkka	not found
Culture	TEHDAS Teatteri	not found
Culture	Valkeakosken kaupunginteatteri	not found
Culture	Varkauden Teatteri	free entrance for personal assistant
Culture	Aboa Vetus & Ars Nova	free entrance for assistance
Culture	Arktikum	free entrance for assistance
Culture	Big wheels	not found
Culture	Guardia Nueva Orkesteriyhdistys Ry	not found
Culture	Huittisten pääkirjasto	not found
Culture	Kamarikuoro Key Ensemble	not found
Culture	Kempeleen kulttuuritoimi	not found
Culture	Keski-Pohjanmaan Kamariorkesteri	free entrance for personal assistant
Culture	Kokkolan Talviharmonikka ry	not found
Culture	Konsertti- ja kongressitalo Mikaeli	not found
Culture	Kristoffer-sali	free entrance for personal assistant
Culture	Kuhmo-talo	not found

Sector	Service provider	Benefit
Culture	Kulttuuritalo Korundi	not found
Culture	Kuopion Musiikkikeskus	free entrance for personal assistant
Culture	Kuralan Kylämäki	not found
Culture	Lauhan Spelit	not found
Culture	Linnalan Setlementti ry	not found
Culture	Merikeskus Vellamo	free entrance for personal assistant
Culture	Mobilian Autokylä	not found
Culture	Musiikkitalo	price reduction, price reduction for assistant
Culture	Pietarsaaren kulttuuritoimisto	not found
Culture	Polyteknikkojen Orkesteri	not found
Culture	Siida	not found
Culture	Tampere-talo	free entrance for personal assistant
Culture	Turun linna	free entrance for personal assistant
Culture	Turun Taidehalli	not found
Culture	Unga Teatern	not found
Culture	Vaasan kaupunginkirjasto	not found
Culture	Vaasan kaupunginorkesteri	free entrance for personal assistant
Culture	Zodiak – Uuden tanssin keskus	not found
Leisure	Bio Jukola Somero	not found
Leisure	Bio Marilyn Seinäjoki	free entrance for personal assistant
Leisure	Bio Marlon	not found
Leisure	Bio-Salo elokuvateatteri	free entrance for personal assistant
Leisure	Bio Sastamala	not found
Leisure	Bio Stara elokuvateatteri	free entrance for personal assistant
Leisure	BioRex Kajaani	free entrance for personal assistant
Leisure	BioRex Pietarsaari	free entrance for personal assistant
Leisure	BioRex Porvoo	free entrance for personal assistant
Leisure	BioRex Riihimäki	free entrance for personal assistant

Sector	Service provider	Benefit
Leisure	BioRex Rovaniemi	free entrance for personal assistant
Leisure	BioRex Sveitsi	free entrance for personal assistant
Leisure	BioRex Tornio	free entrance for personal assistant
Leisure	BioRex Vaasa	free entrance for personal assistant
Leisure	BioRex Verkatehdas	free entrance for personal assistant
Leisure	Finnkino Cine Atlas	price reduction, free entrance for personal assistant
Leisure	FC KTP	not found
Leisure	Finnhits Festivaali	not found
Leisure	Finnkino Fantasia	price reduction, free entrance for personal assistant
Leisure	Finnkino Flamingo	price reduction, free entrance for personal assistant
Leisure	Finnkino Kinopalatsi Helsinki	price reduction, free entrance for personal assistant
Leisure	Finnkino Kinopalatsi Turku	price reduction, free entrance for personal assistant
Leisure	Finnkino Kuvapalatsi	price reduction, free entrance for personal assistant
Leisure	Finnkino Maxim	price reduction, free entrance for personal assistant
Leisure	Finnkino Omena	price reduction, free entrance for personal assistant
Leisure	Finnkino Plaza	price reduction, free entrance for personal assistant
Leisure	Finnkino Plevna	price reduction, free entrance for personal assistant
Leisure	Finnkino Promenadi	price reduction, free entrance for personal assistant
Leisure	Finnkino Scala	price reduction, free entrance for personal assistant
Leisure	Finnkino Sello	price reduction, free entrance for personal assistant
Leisure	Finnkino Strand	price reduction, free entrance for personal assistant
Leisure	Finnkino Tennisalatsi	price reduction, free entrance for personal assistant
Leisure	Kinema Loimaa	not found
Leisure	Savon Kinot – Killa	free entrance for personal assistant
Leisure	Savon Kinot – Kino-Hovi	free entrance for personal assistant
Leisure	Savon Kinot – Kuvalipas	free entrance for personal assistant
Leisure	Savon Kinot – Maxim	free entrance for personal assistant
Leisure	Savon Kinot – Tapio	free entrance for personal assistant

Sector	Service provider	Benefit
Leisure	Kino 1-2, Huittinen	not found
Leisure	Kino 123	not found
Leisure	Kino Kuvakukko	not found
Leisure	Kino Piispanristi	not found
Leisure	Y-Kino	not found
Leisure	Arctic Circle Husky Park	not found
Leisure	Duudsonit Activity Park Espoo	free entrance for personal assistant
Leisure	Duudsonit Activity Park Seinäjoki	free entrance for personal assistant
Leisure	Parkin kenttä	not found
Leisure	Kuopion kansalaisopisto	not found
Leisure	Kurikan kansalaisopisto	not found
Leisure	Lakeudenportin Kansalaisopisto Alavus	not found
Leisure	Lakeudenportin Kansalaisopisto Ähtäri	not found
Leisure	Lakeudenportin Kansalaisopisto Kuortane	not found
Leisure	Vakka-Suomen kansalaisopisto	not found
Leisure	Himos Juhannus	free entrance for personal assistant
Leisure	Raumanmeren Juhannus	free entrance for personal assistant
Leisure	Tahko Juhannus	free entrance for personal assistant
Leisure	Linnanmäki Huvipuisto	not found
Leisure	Nokkakiven Huvipuisto	not found
Leisure	Tykkimäen huvipuisto	free entrance for personal assistant
Leisure	Bowl D1ner / Keilahalli	not found
Leisure	Oulun keilahalli	not found
Leisure	Iisalmen kulttuurikeskus	not found
Leisure	Ylivieskan Kulttuurikeskus Akustiikka	free entrance for assistance
Leisure	Akvaariotalo Maretarium	not found
Leisure	Bastion Bistro	not found
Leisure	Hepokönkään kahvila	not found

Sector	Service provider	Benefit
Leisure	Huviaranta	not found
Leisure	Ilolan maatilamatkailu	not found
Leisure	Imatran Kylpylä	not found
Leisure	Joensuun Botania oy	not found
Leisure	Kehonhuolto Jumissa	not found
Leisure	Korkeasaaren eläintarha	free entrance for personal assistant
Leisure	Kruunupuisto	not found
Leisure	Kulturhuset AX	not found
Leisure	Kuopio Rockcock	free entrance for personal assistant
Leisure	Kylpylähotelli Kunnonpaikka	price reduction, free entrance for personal assistant
Leisure	Muumimaaailma	free entrance for personal assistant
Leisure	Poplar Cafe & Art	not found
Leisure	Provinsi	free entrance for personal assistant
Leisure	Puuhamaa	free entrance for personal assistant
Leisure	Romuralli	not found
Leisure	Rytmikorjaamon elävän musiikin klubi	not found
Leisure	Särkänniemi	free entrance for personal assistant
Leisure	Seikkisrock	not found
Leisure	Tampereen Tullikamari	free entrance for personal assistant
Leisure	Tanssisali Lutakko	free entrance for personal assistant
Leisure	Toimintakeskus Suvanto	not found
Leisure	Uintikeskus Ulpukka	free entrance for personal assistant
Leisure	Vaakahuoneen Paviljonki	not found
Leisure	Vesipuisto Serena	free entrance for personal assistant
Leisure	Viihdekeskus Crazy	not found
Leisure	Virkistyskylpylä Fontanella	not found
Leisure	Visulahti	free entrance for personal assistant
Leisure, Sport	KUOPIO-HALLI	not found

Sector	Service provider	Benefit
Sport	Saimaa Stadiumi	free entrance for personal assistant
Sport	Liikuntaparkki Oy	not found
Sport	Hakunilan uimahalli ja kuntosali	not found
Sport	Hämeenlinnan uimahalli	not found
Sport	Iisalmen uimahalli	not found
Sport	Impivaaran uimahalli	not found
Sport	Korson uimahalli	not found
Sport	Laihian uimahalli	not found
Sport	Laitilan uimahalli	not found
Sport	Lammin uimahalli	not found
Sport	Lippumäen uimahalli	not found
Sport	Mäntän uimahalli	not found
Sport	Kaarinan uimahalli	not found
Sport	Martinlaakson uimahalli ja kuntosali	not found
Sport	Myyrmäen uimahalli ja kuntosali	not found
Sport	Niiralan uimahalli	not found
Sport	Oriveden Uimahalli	not found
Sport	Oulun uimahalli	free entrance for personal assistant
Sport	Petreliuksen uimahalli	not found
Sport	Pieksämäen Uimahalli	not found
Sport	Pietarsaaren Uimahalli	not found
Sport	Porin keskustan uimahalli	price reduction, free entrance for personal assistant
Sport	Raatin uimahalli	free entrance for personal assistant
Sport	Salon uimahalli	not found
Sport	Tervakosken uimahalli	price reduction
Sport	Tikkurilan uimahalli ja kuntosali	not found
Sport	Uimahalli Koskikara	not found
Sport	Uimahalli Lakkuuni	not found

Sector	Service provider	Benefit
Sport	Uimahalli Vesihäisi	not found
Sport	Uudenkaupungin uimahalli	not found
Sport	Valkeakosken uimahalli	not found
Sport	Koivukylän vanhustenkeskuksen kuntosali	not found
Sport	Mänttä-Vilppulan kuntosalit	not found
Sport	Paattisten aluetalon kuntosali	not found
Sport	Varissuon jäähallin kuntosali	not found
Sport	Jatulin liikuntakeskus	free entrance for personal assistant
Sport	Kankaanpään Liikuntakeskus	free entrance for personal assistant
Sport	Liikuntakeskus Hutunki	not found
Sport	Liikuntakeskus Uikko	not found
Sport	Oulunsalon liikuntakeskus	free entrance for personal assistant
Sport	Ylivieskan Liikuntakeskus	not found
Sport	Virkistysuimala Neidonkeidas	not found
Sport	Virkistysuimala Sateenkaari	free entrance for personal assistant
Sport	Virkistysuimala Zimmari	not found
Sport	Kupittaaan maauimala	not found
Sport	Porin Maauimala	free entrance for personal assistant
Sport	Samppalinnan maauimala	not found
Sport	Linnanmaan liikuntahalli	free entrance for personal assistant
Sport	Oriveden Liikuntahalli	not found
Sport	FC KTP	not found
Sport	Hangon liikuntatoimi	not found
Sport	Helsingin kaupungin liikuntapaikat	not found
Sport	HJK	not found
Sport	IBK MedA / Salohalli	not found
Sport	Iisalmen Peli-Karhut Mestis ottelut	free entrance for personal assistant
Sport	Kangasalan ratsastuskoulu	not found

Sector	Service provider	Benefit
Sport	Kuopion Palloseura	free entrance for personal assistant
Sport	Kupittaaan urheiluhalli	price reduction for assistant
Sport	Linnanmaan liikuntahalli	free entrance for personal assistant
Sport	Nokian palloiluhalli	not found
Sport	Oriveden Liikuntahalli	not found
Sport	Ouluhalli	free entrance for personal assistant
Sport	Oulun urheilutalo	free entrance for personal assistant
Sport	Porin Linjat Oy	not found
Sport	Riitan Talli	not found
Sport	Sporttikeskus Tennari	not found
Sport	Tahkonrinteet	not found
Sport	Tappara	free entrance for personal assistant
Sport	Urheiluhallit	not found
Sport	Viihdeuimala Vesihelmi	not found
Sport	Vuokatinrinteet	not found
Transport (private)	Taksi Tampere	not found
Transport (public)	Hämeenlinnan seudun joukkoliikenne	not found
Transport (public)	Joensuun seudun joukkoliikenne	not found
Transport (public)	Jyväskylän seudun joukkoliikenne	not found
Transport (public)	Kotkan seudun joukkoliikenne	not found
Transport (public)	Lahden seudun liikenne	free entrance (wheelchair only), free entrance for personal assistant
Transport (public)	Tampereen seudun joukkoliikenne	not found
Transport (public)	VILKKU – Kuopion seudun joukkoliikenne	free entrance (wheelchair only), free entrance for personal assistant
Transport (public)	Oulun joukkoliikenne	free entrance (wheelchair only), free entrance for personal assistant
Transport (public)	VR	free entrance for personal assistant
Transport (public)	Riihimäen paikallisliikenne	not found
Other ³⁰⁸	Kuntoutuskeskus Kankaanpää	not found

308 The «Other» sector includes science centres.

Sector	Service provider	Benefit
Other	Messukeskus	free entrance for personal assistant
Other	Nuorisokeskus Metsäkartano	not found
Other	Pietarinpirtti	not found
Other	Rauman Järjestöotalo	not found
Other	Taito Kymenlaakso	not found
Other	Tammerkosken Sillalla	not found
Other	Tiedeokeskus Heureka	free entrance for personal assistant
Other	Tiedeokeskus Pilke	not found
Total: 283		

10.4. Malta

Sector	Service Provider	Benefits
Culture	Heritage Malta	Student rate for Cardholders (25-30% discount) and free entrance for personal assistant
Culture	Limestone Heritage	2€ of price reduction
Culture	Mdina Dungeons Museum	20% price reduction
Culture	The Knights Of Malta	20% price reduction
Culture	The Malta Experience	20% price reduction
Culture	The Mdina Experience	20% price reduction
Leisure	db Hotels + Resorts	10% price reduction
Leisure	Klacc u Brejk	Ticket discounted to 15€
Leisure	Playmobil FunPark	50% price reduction for Cardholders
Leisure	Tal-Lira Group	Discounted tickets at Euro 4.15 per Cardholders. With a 10 persons-group, the assistants go in for free.
Leisure	Bird Park Malta	25% price reduction
Leisure	Esplora	4€ entrance instead of 6€, 1€ entrance instead of 2€ for the planetarium show, the assistant enters for free
Leisure	Malta Falconry Centre	25% price reduction
Leisure	Malta National Aquarium	3€ price reduction
Transport (private)	hicabs	10% price reduction
Transport (private)	M Cabs	10% price reduction

Sector	Service Provider	Benefits
Other ³⁰⁹	Dizz Group	10% price reduction
Other	Matrix (Airport)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Matrix (Bay Street)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Matrix (Paola)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Matrix (Sliema)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Matrix (Tigne Point)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Matrix (Valletta)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Debenhams Malta (Paola)	10% OFF all full-price product exc. fragrance & cosmetics
Other	Debenhams Malta (Sliema)	10% OFF all full-price product exc. fragrance & cosmetics
Other	Forestals (Gozo)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Forestals (Mriehel)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Other	Forestals (Valletta)	Domestic Appliances 10%, KitchenAid Mixers and Accs 5%, Video & Hifi & IT equipment 5%, excluding PC/playstation software and playstation console
Total: 28		

³⁰⁹ The «Other» sector includes retail stores.

10.5. Romania

Sector	Name	Benefits
Culture	Muzeul Municipal Câmpulung	Persons with disabilities benefit from free access.
Culture	MUZEUL "ȚĂRII CRIȘURILOR" ORADEA	Persons with disabilities and children from social centers benefit from free access.
Culture	Muzeul Județean Botoșani	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul Județean de Istorie Mures	Persons with disabilities benefit from free access.
Culture	Muzeul de Etnografie Brașov	Persons with disabilities benefit from free access.
Culture	Muzeul Casa Mureșenilor Brașov	Persons with disabilities benefit from free access.
Culture	Muzeul de Artă Brașov	Persons with disabilities benefit from free access.
Culture	Muzeul Țării Făgărașului "Valer Literat", Făgăraș	Persons with disabilities benefit from free access.
Culture	Muzeul Județean „Al. Odobescu" Buzău	Persons with disabilities and their accompanying persons benefit from free access.
Culture	Muzeul Banatului Montan	Persons with disabilities benefit from free access.
Culture	Muzeul Județean de Etnografie și al Regimentului de Graniță Caransebeș	Persons with disabilities benefit from free access.
Culture	Muzeul Civilizației Gumelnita, Oltenița	Persons with disabilities benefit from free access.
Culture	Muzeul de Artă Cluj	Persons with disabilities benefit from free access.
Culture	Muzeul Etnografic al Transilvaniei Cluj-Napoca	Persons with disabilities benefit from free access.
Culture	Muzeul " Octavian Goga" Ciucea	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul de Artă Constanta	Persons with disabilities benefit from free access.
Culture	Muzeul de Istorie Națională și Arheologie Constanta	Persons with disabilities benefit from free access.
Culture	Muzeul de Istorie și Arheologie Callatis, Mangalia	Persons with disabilities benefit from free access.
Culture	MUZEUL JUDEȚEAN GORJ "ALEXANDRU ȘTEFULESCU"	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul Civilizației Dacice și Romane Hunedoara - Deva	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul Castelul Corvinilor, Hunedoara	The adult with severe or accentuated disability and their accompanying person and children with disabilities with their accompanying person benefit from free access.
Culture	Muzeul Județean de Istorie și Arheologie Baia Mare	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul Județean de Etnografie și Artă Populară Maramureș	Persons with disabilities benefit from free access.
Culture	Muzeul Județean de Artă "Centrul Aitistic Baia Mare"	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Muzeul Județean de Mineralogie "Victor Gorduza" Baia Mare	Persons with disabilities benefit from free access.
Culture	Muzeul Județean Mureș	Persons with disabilities benefit from free access.
Culture	Muzeul de Istorie Sighișoara	Persons with disabilities benefit from free access.
Culture	Muzeul de Istorie, Roman	Persons with disabilities benefit from free access.
Culture	Muzeul de Științe ale Naturii, Roman	Persons with disabilities benefit from free access.
Culture	Muzeul de Artă, Roman	Persons with disabilities benefit from free access.
Culture	Muzeul Județean Olt	Persons with disabilities benefit from free access.
Culture	MUZEUL JUDEȚEAN DE ARTĂ PRAHOVA "ION IONESCU-QUINTUS"	Persons with disabilities benefit from free access.

Sector	Name	Benefits
Culture	MUZEUL JUDEȚEAN DE ISTORIE ȘI ARHEOLOGIE PRAHOVA	Persons with disabilities benefit from free access.
Culture	MUZEUL JUDEȚEAN DE ȘTIINȚELE NATURII PRAHOVA	Persons with disabilities benefit from free access.
Culture	Muzeul memorial B.P. Hașdeu, Câmpina	Persons with disabilities benefit from free access, free entrance for the personal assistant.
Culture	Muzeul Județean de Istorie și Artă Zalău	Persons with disabilities benefit from free access.
Culture	Muzeul Civilizației Populare Tradiționale ASTRA	Persons with disabilities benefit from free access.
Culture	Muzeul de Etnografie Universală Franz Binder	Persons with disabilities benefit from free access.
Culture	Muzeul de Etnografie Săsească Emil Sigerus	Persons with disabilities benefit from free access.
Culture	Muzeul Bucovinei	
Culture	Muzeul Județean Teleorman	Persons with disabilities benefit from free access.
Culture	Muzeul Național al Banatului Timișoara	Persons with disabilities benefit from free access.
Culture	Muzeul Satului Bănățean	Persons with disabilities and their accompaniment benefit from free access.
Culture	Muzeul de Artă Timișoara	Persons with disabilities benefit from free access.
Culture	Muzeul Constantin Găvănea, Tulcea	Persons with disabilities benefit from free access.
Culture	Muzeul Județean „Ștefan cel Mare” Vaslui	Persons with disabilities benefit from free access.
Culture	Muzeul „Vasile Pârvan” Bârlad	Persons with disabilities benefit from free access.
Culture	Muzeul Vrancei	Persons with medium and easy disabilities benefit by 75% discount of the total ticket price, and persons with severe or accentuated disabilities benefit from free access, as well as their accompaniment.
Culture	Centrul Cultural Reduta Brașov	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Centrul Cultural Județean Constanta „Teodor T. Burada”	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Centrul Cultural și de Arte Lăzarea	Persons with disabilities benefit from free access.
Culture	Centrul Cultural Județean Harghita (CCJH)	Persons with disabilities benefit from free access.
Culture	Centrul Cultural „Bucovina”	Persons with disabilities benefit from free access.
Culture	Centrul Cultural "Jean Bart" Tulcea	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Centrul Cultural Vrancea	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală "Ion Barbu", Câmpulung	Persons with disabilities benefit from free access.
Culture	BIBLIOTECA JUDEȚEANĂ "GHEORGHE ȘINCAI" ORADEA	Persons with disabilities benefit from free access.
Culture	Biblioteca "Ion Munteanu", Marghita	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "George Coșbuc" Bistrița-Năsăud	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană „Mihai Eminescu” Botoșani	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană George Barițiu Brașov	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală "Octavian Paler", Făgăraș	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană „V. Voiculescu” Buzău	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Paul Iorgovici"	Persons with disabilities benefit from free access.
Culture	Biblioteca municipală Oltenita	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Octavian Goga" Cluj-Napoca	Persons with disabilities benefit from free access.

Sector	Name	Benefits
Culture	Biblioteca Județeană „I.N.Roman” Constanta	Persons with disabilities benefit from free access.
Culture	Biblioteca Franceză, Mangalia	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală Mangalia	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană I.H. Rădulescu Dâmbovița	Persons with disabilities benefit from free access.
Culture	BIBLIOTECA JUDEȚEANĂ "CHRISTIAN TELL" GORJ	Persons with disabilities benefit from free access.
Culture	Biblioteca municipiului Motru	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Kajoni Janos"	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană Ovid Densusianu Hunedoara - Deva	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală, Hunedoara	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală „Gheorghe Pârvu” Brad	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Petre Dulfu"	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană Mureș	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală "Zaharia Boiu", Sighișoara	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană „G.T. Kirileanu"	Persons with disabilities benefit from free access.
Culture	Biblioteca Municipală „George Radu Melidon", Roman	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană Olt „Ion Minulescu"	Persons with disabilities benefit from free access.
Culture	BIBLIOTECA JUDEȚEANĂ "NICOLAE IORGA"	Persons with disabilities benefit from free access.
Culture	Biblioteca municipală Dr. C. I. Istrati, Câmpina	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Ioniță Scipione Bădescu" Sălaj	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană ASTRA din Sibiu	Persons with disabilities benefit from free access.
Culture	Biblioteca Bucovinei „I. G. Sbiera"	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Marin Preda" Teleorman	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană Timiș	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană "Panait Cerna" Tulcea	Persons with disabilities benefit from free access.
Culture	Biblioteca Județeană „Duiliu Zamfirescu"	Persons with disabilities benefit from free access.
Culture	TEATRUL "REGINA MARIA"	Persons with disabilities benefit from free access.
Culture	TEATRUL "SZIGLIGETI SZINHAZ"	Persons with disabilities benefit from free access.
Culture	TEATRUL DE PĂPUȘI "CĂRĂBUȘ", Brăila	Persons with disabilities benefit from free access.
Culture	TEATRUL "MARIA FILOTTI", Brăila	Persons with disabilities benefit from free access.
Culture	Teatrul „George Ciprian" Buzău	Persons with disabilities benefit from free access.
Culture	Teatrul de Vest Reșița	Persons with disabilities benefit from free access.
Culture	Teatrul de Păpuși "Puck" Cluj-Napoca	Persons with disabilities benefit from free access.
Culture	Teatrul de Stat Constanta	Persons with disabilities benefit from free access.
Culture	Teatrul pentru Copii si Tineret Constanta „Căluțul de mare"	Persons with disabilities benefit from free access.
Culture	Teatrul Tudor Vianu	Persons with disabilities benefit from free access.
Culture	Teatrul de Artă Deva	Persons with disabilities benefit from free access.
Culture	Teatrul Dramatic I.D. Sârbu Petroșani	Persons with disabilities benefit from free access.
Culture	Tineretului Piatra Neamț	Persons with disabilities benefit from free access.

Sector	Name	Benefits
Culture	Teatrul pentru Copii și Tineret Merlin	Persons with disabilities benefit from free access.
Culture	Teatrul "Victor Ion Popa" Bârlad	Persons with disabilities benefit from free access.
Culture	Teatrul Municipal „Ariel”, Rm. Vâlcea	Persons with disabilities benefit from free access.
Culture	Casa de Cultură "Tudor Mușatescu", Câmpulung	Persons with disabilities benefit from free access.
Culture	Casa de Cultură a Sindicatelor Oradea	Persons with disabilities benefit from free access.
Culture	Casa de Cultură, Marghita	Persons with disabilities benefit from free access.
Culture	Casa de Cultură a municipiului Cluj-Napoca	Persons with disabilities benefit from free access.
Culture	Casa de Cultură a Sindicatelor, Mangalia	Persons with disabilities benefit from free access.
Culture	Casa de Cultură Brad	Persons with disabilities benefit from free access.
Culture	Casa de Cultură "Geo Bogza", Câmpina	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Casino - Centrul de Cultură Urbană (vă rugăm să contactați Primăria mun. Cluj-Napoca, Serviciul Public pentru administrare obiective culturale), Cluj – Napoca	Persons with disabilities benefit from free access.
Culture	Centrul de Cultură și Artă al județului Hunedoara	Persons with disabilities benefit from free access.
Culture	Centrul de Cultură și Artă Sălaj	Persons with disabilities benefit from free access.
Culture	Centrul de Cultură și Artă a Județului Timiș	Persons with disabilities benefit from free access.
Culture	FILARMONICA DE STAT ORADEA	Persons with disabilities benefit from free access.
Culture	Filarmonica de Stat "Transilvania" Cluj-Napoca	Persons with disabilities benefit from free access.
Culture	Filarmonica de Stat Mures	Persons with disabilities benefit from free access.
Culture	Filarmonica de Stat Sibiu	Persons with disabilities benefit from free access.
Culture	Filarmonica „Ion Dumitrescu”, Rm. Vâlcea	Persons with disabilities benefit from free access.
Culture	Casa de cultura a municipiului Motru	Persons with disabilities benefit from free access.
Culture	Casa multiculturală Motru	Persons with disabilities benefit from free access.
Culture	Complexul Muzeal Bistrița-Năsăud	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Complexul Muzeal de Stiinte ale Naturii Constanta	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Complexul Național Muzeal “Curtea Domnească” Târgoviște	Persons with disabilities and their accompanying benefit from free access.
Culture	Complexul Muzeal Județean Neamț	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Complexul Național Muzeal ASTRA din Sibiu:	Persons with disabilities and their accompanying benefit from free access.
Culture	Pavilionul Muzeal Multicultural	Persons with disabilities benefit from free access.
Culture	Institutul de Cercetări Eco-Muzeale "Gavrilă Simion" Tulcea	Persons with disabilities benefit from free access.
Culture	Școala Populară de Arte și Meserii Botosani	There is no entrance fee.
Culture	ȘCOALA POPULARĂ DE ARTĂ TÂRGU JIU	There are fees for each course, persons with disabilities benefit from discounts.
Culture	Școala Populară de Arte și Meserii	There is no entrance fee.
Culture	Școala Populară de Arte și Meserii „Ilie Micu”	There is no entrance fee.
Culture	Sala de Spectacole "Florica Ungur", Oradea	There are fees for each event, persons with disabilities benefit from discounts.
Culture	Cetatea Oradea	Persons with disabilities benefit from free access.
Culture	Memorialul Ipotești - „Centrul Național de Studii Mihai Eminescu"	Persons with disabilities benefit from free access.

Sector	Name	Benefits
Culture	Orchestra Populară „Rapsozii Botoșanilor”	There is no entrance fee.
Culture	Casa Municipală de Cultură Făgăraș	Persons with disabilities benefit from free access.
Culture	Direcția Patrimoniu - în structura aparatului de specialitate - Sala Polivalentă Reșița	Persons with disabilities benefit from free access.
Culture	Turnul Croitorilor (vă rugăm să contactați Primăria mun. Cluj-Napoca, Serviciul Public pentru administrare obiective culturale), Cluj – Napoca	Persons with disabilities benefit from free access.
Culture	ANSAMBLUL ARTISTIC PROFESIONIST "DOINA GORJULUI" TÂRGU JIU	There is no entrance fee.
Culture	Palatul Cultural „Theodor Costescu”, Drobeta Turnu Severin	Persons with disabilities benefit from free access.
Culture	Castelul Artelor, Drobeta Turnu Severin	Persons with disabilities benefit from free access.
Culture	Cetatea Medievală, Drobeta Turnu Severin	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Ansamblul Artistic Profesionist „Mureșul”	Persons with disabilities benefit from free access.
Culture	Sala de Spectacole "Mihai Eminescu", Sighișoara	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Centrul pentru Cultură și Arte „Carmen Saecularae”	There is no entrance fee.
Culture	Ansamblul Profesionist Pentru Promovarea Culturii Tradiționale „DOINA OLTULUI”	There is no entrance fee.
Culture	Centrul ASTRA pentru Patrimoniu	Persons with disabilities benefit from free access.
Culture	ASTRA Film, Sala Studio	Persons with disabilities benefit from discounts on the entrance ticket.
Culture	Galeriile de Artă Populară	Persons with disabilities benefit from free access.
Culture	Satul Pescăresc Tradițional, Tulcea	Not found.
Culture	Bienala Umorului „Constantin Tănase” Vaslui.	Persons with disabilities benefit from free access.
Culture	Primăria Municipiului Slatina	
Culture	Primăria Municipiului Caracal	
Culture	Primăria Orașului Corabia	
Culture	Primăria orașului Piatra Olt	
Culture	Primăria Orașului Drăgănești - Olt	
Culture	Primăria Balș	
Leisure	Cinema Dacia (vă rugăm să contactați Primăria mun. Cluj-Napoca, Serviciul Public pentru administrare obiective culturale), Cluj – Napoca	Persons with disabilities benefit from free access.
Leisure	Cinema Marăști (vă rugăm să contactați Primăria mun. Cluj-Napoca, Serviciul Public pentru administrare obiective culturale), Cluj – Napoca	Persons with disabilities benefit from free access.
Leisure	Cinematograful „Geo Saizescu”, Rm. Vâlcea	Persons with disabilities benefit from free access.
Leisure	Ștrandul loșia Nord, Oradea	Persons with disabilities benefit from discounts on the entrance ticket or the subscription.
Leisure	Ștrandul municipal, Marghita	Persons with disabilities benefit from discounts on the entrance ticket or the subscription.

Sector	Name	Benefits
Leisure	Ștrandul Schela, Drobeta Turnu Severin	Persons with disabilities benefit from discounts on the entrance ticket or the subscription.
Leisure	Ștrandul Municipal, Piatra Neamț	Persons with disabilities benefit from discounts on the entrance ticket or the subscription.
Leisure	CENTRUL JUDEȚEAN PT.CONSERVAREA ȘI PROMOVAREA CULTURII TRADIȚIONALE BIHOR	Persons with disabilities benefit from free access.
Leisure	Centrul Județean pentru Cultură Bistrița-Năsăud	Persons with disabilities benefit from discounts on the entrance ticket
Leisure	Centrul Județean pentru Conservarea și Promovarea Culturii Tradiționale Botoșani	Persons with disabilities benefit from free access.
Leisure	Centrul Județean de Cultură și Artă Buzău	Persons with disabilities benefit from free access.
Leisure	Centrul Județean pentru Conservarea și Promovarea Culturii Tradiționale Caraș- Severin	Persons with disabilities benefit from free access.
Leisure	CENTRUL JUDEȚEAN PENTRU CONSERVAREA SI PROMOVAREA CULTURII TRADIȚIONALE GORJ	Persons with disabilities benefit from free access.
Leisure	Centrul Județean Pentru Conservarea și Promovarea Culturii Tradiționale Harghita	Persons with disabilities benefit from free access.
Leisure	Centrul Județean pentru Cultură Tradițională și Educație Artistică Mureș	Persons with disabilities benefit from free access.
Leisure	CENTRUL JUDEȚEAN DE CULTURĂ PRAHOVA	Persons with disabilities benefit from discount of taxes, and persons who are particularly talented, from social assistance centers, benefit from free access.
Leisure	Centrul Județean pentru Conservarea și promovarea Culturii Tradiționale Cindrelul Junii Sibiului	Persons with disabilities benefit from free access.
Leisure	Centrul Județean de Conservare si Promovare a Culturii Tradiționale Teleorman	Persons with disabilities benefit from free access.
Leisure	Informații despre acest festival se găsesc la Centrul Județean pentru Conservarea și Promovarea Culturii Tradiționale Vaslui, str. Ștefan cel Mare, nr. 79, 730168, tel. / fax: 0235.401166, 0235.401167, http://www.cjcpctvs.ro/	Persons with disabilities benefit from free access.
Leisure	Grădina Zoologică, Oradea	Persons with disabilities benefit from discounts on the entrance ticket or the subscription
Leisure	Serviciul Public Grădina Zoologică și Ecarisaj, Hunedoara	Persons with disabilities benefit from discounts on the entrance ticket
Leisure	Grădina Zoologică, Rm. Vâlcea	Persons with disabilities benefit from discounts on the entrance ticket
Leisure	REVISTA DE CULTURĂ "FAMILIA"	Not found.
Leisure	REVISTA CULTURALĂ "VĂRAD"	Not found.
Leisure	Aquapark Nymphaea Oradea	Persons with disabilities benefit from discounts on the entrance ticket.
Leisure	Complexul de agrement Motru	Persons with disabilities benefit from discounts on the entrance ticket.
Leisure	Complexul astronomic Baia Mare	Persons with disabilities benefit from free access.
Leisure	Direcția de Administrare a Parcului Național Ceahlău	
Leisure	Clubul Copiilor Roman	Persons with disabilities benefit from free access.
Leisure	Casa Tineretului, Câmpina	Persons with disabilities benefit from free access.

Sector	Name	Benefits
Sport	Clubul Sportiv Municipal Oradea	Persons with disabilities benefit from discounts.
Sport	Asociația sportiva "Club sportiv municipal Oltenita"	Persons with disabilities benefit from discounts.
Sport	Complex Agreement- Bază sportivă Gheorghieni (Primăria mun. Cluj-Napoca, Direcția Generală Comunicare, Dezvoltare Locală și Management Proiecte- Compartiment administrare), Cluj - Napoca	Persons with disabilities benefit from discounts.
Sport	Baza Sportivă Pescăruș, Mangalia	Persons with disabilities benefit from discounts.
Sport	Sala de sport, Motru	Persons with disabilities benefit from discounts.
Sport	Complexul Sportiv "Michael Klein" și Ștrandul Municipal, Hunedoara	Persons with disabilities benefit from discounts.
Sport	Club Sportiv Municipal Roman,	Persons with disabilities benefit from discounts.
Sport	Sala de Sport Multifuncțională "Daniel Iulian Pohariu", Tulcea	Persons with disabilities benefit from discounts.
Sport	Complexul sportiv și de agrement „Arenele Traian” , Rm. Vâlcea	Persons with disabilities benefit from discounts.
Sport	Stadionul municipal Marghita	Persons with disabilities benefit from discounts.
Sport	Stadionul Municipal Botoșani	Persons with disabilities benefit from discounts.
Sport	STADIONUL MUNICIPAL BRĂILA	Persons with disabilities benefit from discounts.
Sport	Stadionul Central Mangalia	Persons with disabilities benefit from discounts.
Sport	Stadionul Minerul Motru	Persons with disabilities benefit from discounts.
Sport	Stadionul municipal, Drobeta Turnu Severin	Persons with disabilities benefit from discounts.
Sport	Stadionul Municipal, Sighișoara	Persons with disabilities benefit from discounts.
Sport	Stadionul Ceahlăul, Piatra Neamț	Persons with disabilities benefit from discounts.
Sport	Stadionul Delta, Tulcea	Persons with disabilities benefit from discounts.
Sport	Stadionul Cozma Zăit, Tulcea	Persons with disabilities benefit from discounts.
Sport	Bazinul de înot Câmpulung	Persons with disabilities benefit from discounts.
Sport	Sala Polivalentă SA, Cluj - Napoca	Persons with disabilities benefit from free access.
Sport	Sala Polivalentă "Radu Voina", Sighișoara	Persons with disabilities benefit from free access.
Sport	Sala Polivalentă, Piatra Neamț	Persons with disabilities benefit from free access.
Sport	Bazinul de înot didactic, Câmpina	Persons with disabilities benefit from discounts on the entrance ticket.
Sport	Serviciul Public Sala Transilvania	Persons with disabilities benefit from free access.
Sport	Patinoarul din Parcul Ciuperca, Tulcea	Persons with disabilities benefit from discounts on the entrance ticket.
Total: 218		

10.6. Slovenia

Sector	Service Provider	Benefits
Culture	Galerija Krško in Mestni muzej Krško	Free entrance
Culture	Gorenjski muzej	Free entrance
Culture	Goriški muzej	Free entrance
Culture	Gornjesavski muzej Jesenice - Kajžnkova hiša	Free entrance
Culture	Gornjesavski muzej Jesenice - Kosova Graščina	Free entrance
Culture	Gornjesavski muzej Jesenice - Liznjekova domačija	Free entrance
Culture	Gornjesavski muzej Jesenice - Muzejske hiše na stari savi	Free entrance
Culture	Gornjesavski muzej Jesenice - Slovenski planinski muzej	40% price reduction
Culture	Koroški pokrajinski muzej	15% price reduction
Culture	Loški muzej Škofja Loka	Free entrance
Culture	Medobčinski muzej Kamnik	Free entrance
Culture	Mestni muzej Idrija	20% price reduction
Culture	Mestni muzej Ljubljana	30% price reduction, free entrance for personal assistants
Culture	Muzej in galerije mesta Ljubljane	50% price reduction, free entrance for personal assistants
Culture	Muzej na prostem Rogatec	20% price reduction
Culture	Muzej novejše zgodovine Celje	Free entrance
Culture	Muzej novejše zgodovine Slovenije	Free entrance
Culture	Muzej pošte in telekomunikacij	Free entrance
Culture	Muzej sodobne umetnosti Metelkova	Free entrance+ free tours
Culture	Muzej Velenje	Free entrance + assistance
Culture	Muzej Vrbovec, muzej gozdarstva in lesarstva	Free entrance
Culture	Muzej za arhitekturo in oblikovanje	Free entrance
Culture	Muzeji radovljiške občine	
Culture	Narodni muzej Slovenije	Free entrance
Culture	Narodni muzej Slovenije – Metelkova	Free entrance
Culture	Pokrajinski muzej Celje	50% price reduction

Sector	Service Provider	Benefits
Culture	Pokrajinski muzej Koper	Free entrance
Culture	Prirodoslovni muzej Slovenije	Free entrance
Culture	SLOGI – Gledališki muzej	Free entrance
Culture	Tehniški muzej Slovenije	Free entrance
Culture	Tolminski muzej	Free entrance
Culture	Tržiški muzej	Free entrance
Culture	Cankarjeva knjižnica Vrhnika	Free entrance
Culture	Knjižnica – Kulturni center Lendava – Lendvai Könyvtár és Kulturális Központ	Free entrance
Culture	Knjižnica Brežice	Free courses, free material, free internet
Culture	Knjižnica Domžale	Free membership fee
Culture	Knjižnica Dravograd	Free membership fee
Culture	Knjižnica Franca Ksavra Meška Ormož	Free entrance, free internet
Culture	Knjižnica Josipa Vošnjaka Slovenska Bistrica	Free membership fee
Culture	Knjižnica Kočevje	30% discount on membership fee, free events
Culture	Knjižnica Lenart	Free membership fee
Culture	Knjižnica Medvode	Free membership fee
Culture	Knjižnica Rogaška Slatina	50% discount on membership fee, free courses
Culture	Lavričeva knjižnica Ajdovščina	Free events, free internet
Culture	Ljudska knjižnica Metlika	33% discount on membership fee
Culture	Mariborska knjižnica	Free membership fee, free events
Culture	Mestna knjižnica Izola	Free membership fee, free events
Culture	Mestna knjižnica Grosuplje	Free membership fee, free events
Culture	Mestna knjižnica in čitalnica Idrija	Free membership fee, free events
Culture	Mestna knjižnica Kranj	Free membership fee, free events
Culture	Mestna knjižnica Ljubljana	Free membership fee
Culture	Narodna in univerzitetna knjižnica, Ljubljana	60% membership fee, free events
Culture	Občinska knjižnica Jesenice	25% price reduction
Culture	Osrednja knjižnica Celje - Knjižnica Celje	50% discount on membership fee

Sector	Service Provider	Benefits
Culture	Osrednja knjižnica Celje - Knjižnica Dobrna	50% discount on membership fee
Culture	Osrednja knjižnica Celje - Knjižnica Šmartno v Rožni dolini	50% discount on membership fee
Culture	Osrednja knjižnica Celje - Knjižnica Štore	50% discount on membership fee
Culture	Osrednja knjižnica Celje - Knjižnica Vojnik	50% discount on membership fee
Culture	Splošna knjižnica Ljutomer	Free membership fee, free events
Culture	Univerza v Mariboru, Univerzitetna knjižnica Maribor	Price reduction, services
Culture	Galerija Božidar Jakac	Free entrance
Culture	Galerija Murska Sobota	Free entrance
Culture	Moderna galerija	10% price reduction
Culture	Narodna galerija	Free entrance
Culture	Pilonova galerija Ajdovščina	Free entrance
Culture	Pilonova galerija Ajdovščina	Free entrance
Culture	Umetnostna galerija Maribor	Free entrance
Culture	Kosovelov dom Sežana - kulturni center Krasa	10% price reduction
Culture	Kulturni dom Franca Bernika Domžale	50% price reduction
Culture	Kulturni dom Krško	Free entrance
Culture	Kulturni dom Nova Gorica	20% price reduction
Culture	Kulturni Dom Zagorje ob Savi	15% price reduction
Culture	Mladinski informativni in kulturni klub Murska Sobota	Free entrance to the concerts
Culture	King Kong teater	20% price reduction
Culture	Fotografski atelje Klara	Not found
Culture	Fotografski atelje Klara	Not found
Culture	Avrora AS, distribucija in založništvo, d.o.o.	Price reduction
Culture	Beletrina	Price reduction
Culture	Čopova rojstna hiša	33% price reduction
Culture	Didakta d.o.o.	5% price reduction
Culture	Dvorec Strmol	20% price reduction
Culture	Finžgarjeva rojstna hiša	33% price reduction

Sector	Service Provider	Benefits
Culture	Gledališče Toneta Čufarja Jesenice	50% price reduction
Culture	Info središče Dom Trenta	30% price discount
Culture	Infocenter Triglavska roža Bled	20% price reduction
Culture	Javni zavod Bogenšperk	5% price reduction
Culture	Javni Zavod Krajski Park Kolpa	50% price reduction
Culture	K dizajn, umetniško ustvarjanje, Sandra Pohole s.p.	20% price reduction
Culture	Knjigarna Beletrina	15% price reduction
Culture	Kulturno rekreacijski center Hrastnik	20% price reduction
Culture	Mestno gledališče ljubljansko	Services (guided tour)
Culture	Mladinska knjiga Trgovina	10% price reduction
Culture	Obalne galerije Piran/Gallerie costire Pirano	Free entrance
Culture	Pionirski dom - Center za kulturo mladih	Free entrance
Culture	Prešernova rojstna hiša	33% price reduction
Culture	SLG Celje	Price reduction
Culture	Slovenska matica	10% price reduction
Culture	Slovensko narodno gledališče Drama Ljubljana	Free entrance
Culture	STIK Laško -TIC Laško	50% price reduction
Culture	Studo Černe d.o.o.	5% price reduction
Culture	Zavod za kulturo madžarske narodnosti - Magyar Nemzetiségi Művelődési Intézet	20% price reduction
Culture	Zgodovinski arhiv Celje	Free entrance
Leisure	Festival Velenje	Free entrance
Leisure	Park Škocjanske jame, Slovenija	Not found
Leisure	Aerodium Logatec	Price reduction
Leisure	Arboretum Volčji Potok	Price reduction
Leisure	Center Triglavskega narodnega parka Bohinj	Price reduction
Leisure	Javni zavod Kinodvor	50% price reduction
Leisure	Megaciklon d.o.o.	2€ price discount
Leisure	Mestni kino Ptuj - Center interesnih dejavnosti Ptuj	20% price reduction

Sector	Service Provider	Benefits
Leisure	Otok, zavod za razvijanje filmske kulture Ljubljana	Price reduction
Leisure	Slovenska kinoteka	Free entrance
Leisure	TAJO-team d.o.o.	15% price reduction
Sport	Karate klub Sokol	20% price reduction
Sport	Balinarski klub LESCE	Free entrance
Sport	BK Boxeo	Price reduction
Sport	Infinity strap - pripomoček za vadbo	30% price reduction
Sport	Javni zavod za šport Nova Gorica	Price reduction
Sport	Javni zavod za šport Slov. Bistrica	15% price reduction
Sport	Prošport center Stražišče, Fit tim d.o.o.,	15% price reduction
Sport	RTC Žičnice Kranjska Gora d.d.	10%-100% price reduction
Sport	Sunny Studio d.o.o.	10% price reduction
Sport	Udobno po svetu	5% price reduction, services
Sport	Zavod za šport Ajdovščina	10% price reduction
Other ³¹⁰	Audio BM d.o.o - Ljubljana	5-20% price reduction on products, free hearing test
Other	Audio BM - Murska Sobota	5-20% price reduction on products, free hearing test
Other	Audio BM - Šempeter pri Gorici	5-20% price reduction on products, free hearing test
Other	Audio BM - Trbovlje	5-20% price reduction on products, free hearing test
Other	Audio BM - Velenje	5-20% price reduction on products, free hearing test
Other	Audio BM d.o.o - Brežice	5-20% price reduction on products, free hearing test
Other	Audio BM d.o.o - Koper	5-20% price reduction on products, free hearing test
Other	Audio BM d.o.o - Kranj	5-20% price reduction on products, free hearing test
Other	Audio BM d.o.o - Maribor	5-20% price reduction on products, free hearing test
Other	Audio BM d.o.o - Novo mesto	5-20% price reduction on products, free hearing test
Other	Društvo diabetikov Maribor	Free blood sugar measurement
Other	Društvo gluhih in naglušnih Koroške	Services

³¹⁰ The "Other" sector includes retail stores, hotels, medical devices companies, counseling services, touristic offices.

Sector	Service Provider	Benefits
Other	Društvo gluhih in naglušnih Podravja Maribor	Services
Other	Društvo gluhih in naglušnih Pomurja Murska Sobota	Services
Other	Društvo REPS Maribor	Free counseling services, 15% price reduction on dog school
Other	Društvo SLO-CANIS	Free counseling services, 15% price reduction
Other	Društvo za avtizem DAN Maribor	Free counseling services
Other	Društvo za cerebralno paralizo Ljubljana	Not found
Other	Društvo za cerebralno paralizo Sonček Posavje	Services
Other	Literarno-umetniško društvo Literatura	15% price reduction
Other	Medobčinsko društvo gluhih in naglušnih Velenje	Services
Other	Medobčinsko društvo slepih in slabovidnih Murska Sobota	Services
Other	Sonček-Mariborsko društvo za cerebralno paralizo	Services
Other	Športno društvo Loke v Tuhinju	Price reduction
Other	Hotel Bau	5% price reduction
Other	Hotel Cerknjo d.o.o.	Free ski pass for blind, no tourism tax for Cardholders
Other	Hotel Hvala - Restavracija Topli val	10% price reduction
Other	Hotel Kovač, Kolpa d.o.o.	10% price reduction
Other	Hotel Park Ljubljana, Tabor Ljubljana d.o.o	10% price reduction
Other	Hotel Tabor Maribor	10% price reduction
Other	Hotel Tripič	10% price reduction
Other	Hotel&Restavracija Krek (Krek d.o.o.)	10% price reduction
Other	Hostel Situla	10% price reduction
Other	PAC, doživljajski turizem, d.o.o.	15% price reduction
Other	Pokljuka turizem d.o.o.	10% price reduction
Other	Turizem in kultura Radovljica, PE Linhartova dvorana	Price reduction
Other	Turizem Ljubljana	10% price reduction
Other	Zavod za kulturo, turizem in šport Vranksko	Free entrance
Other	Zavod za turizem Maribor – Pohorje TIC Maribor	10% price reduction
Other	Zavod za turizem Maribor – Pohorje, P. E. Hiša Stare trte	10% price reduction

Sector	Service Provider	Benefits
Other	Društvo diabetikov Maribor	Free blood sugar measurement
Other	Društvo gibalno oviranih invalidov Slovenije VIZIJA	Services
Other	Društvo gluhih in naglušnih Koroške	Services
Other	Društvo gluhih in naglušnih Podravja Maribor	Services
Other	Društvo gluhih in naglušnih Pomurja Murska Sobota	Services
Other	Društvo REPS Maribor	Free counseling services, 15% price reduction on dog school
Other	Društvo SLO-CANIS	Free counseling services, 15% price reduction
Other	Društvo za avtizem DAN Maribor	Free counseling services
Other	Društvo za cerebralno paralizo Ljubljana	Services
Other	Društvo za cerebralno paralizo Sonček Posavje	Services
Other	Medobčinsko društvo gluhih in naglušnih Velenje	Services
Other	Medobčinsko društvo slepih in slabovidnih Murska Sobota	Services
Other	Sonček-Mariborsko društvo za cerebralno paralizo	Services
Other	Športno društvo Loke v Tuhinju	Price reduction
Other	Alpinum hoteli d.o.o. - hotel Jezero****	Price reduction
Other	Agring d.o.o.	5% price reduction
Other	BUREK OLIMPIJA	Price reduction
Other	Dom paraplegikov, Središče zdravja in počitnic, d.o.o.	10% price reduction
Other	Dr. Web Security Space	25% price reduction
Other	Elementum d.o.o.	Price reduction
Other	Gm skupina d.o.o.	10% price reduction
Other	Grad Rajhenburg	Free entrance
Other	iusworld	First free consultation, then 20% discount
Other	Kamot Sistem d.o.o.	10% price reduction
Other	Medicinski pripomočki Sensorika Varga	10% price reduction
Other	Mladinski cente Velenje, PE Mladinski hotel Velenje	10% price reduction
Other	Mladinski center Hrastnik	Free entrance
Other	Modna prodajalna Madam IRIS	Price discount

Sector	Service Provider	Benefits
Other	Morje možnosti d.o.o.	10% price reduction
Other	Narodni dom Maribor	Free entrance for those on wheelchair
Other	Palačinkomat	20% price reduction
Other	PECS - Picture Exchange Communication System	Price reduction
Other	Pod Skalo, d.o.o.	10% price reduction
Other	Premiki zavod za svetovanje, promocijo in razvoj dostopnega turizma Ljubljana	15% price reduction, free service
Other	Prešernovo gledališče Kranj	Free service
Other	Promo potovanja d.o.o	10% price reduction
Other	Senzorika Varga	10% price reduction
Other	Slovensko narodno gledališče Nova Gorica	20-30% price reduction
Other	Terme Dobrna d.d.	15% price reduction
Other	Tesla center	15-20% price reduction
Other	TM Potovanja d.o.o.	10% price reduction
Other	Turi d.o.o.	10% price reduction
Other	Vila zdravja, Frekvenca d.o.o	30% price reduction
Other	Zavod Šouhostel	10% price reduction
Other	Zavod za kvalitetnejše življenje duševno, gibalno oviranih in starejših oseb TRS-prevozi	5% price reduction
Other	Zdravilišče Rogaška - Zdravstvo d.o.o.	10% price reduction
Other	Združenje gluhoslepih Slovenije DLAN	Services
Other	Živalski vrt Ljubljana	75% price discount
Other	Zveza paraplegikov Slovenije	10% price reduction
Other	Zveza Sonček so.p.	Free entrance
Other	Zveza Sožitje - zveza društev za pomoč osebam z motnjami v duševnem razvoju Slovenije	Services
Association	Društvo gibalno oviranih invalidov Slovenije VIZIJA	Assistance services, free transport and assistant
Total: 216		

11. Mapping of costs

Table 43 - Costs incurred by each Member State per activity

Activity	Unit of measure	BE	CY	FI	MT	RO	SI
Set up the DCNO	FTE	0			-		400 h
	EUR	0	0		-		20,000
Establish the national website	FTE	-			-		400 h
	EUR	25,000	6,764.36	16,427 ³¹¹	6,500	9,923	20,000
Update the national website	FTE		0		n/a		-
	EUR	5,000	0	5,862	900 ³¹²	0	-
Establishing the database of eligible persons	FTE		0		11,500		-
Uploading information of eligible persons database	FTE		0		2		-
Updating information of eligible persons database	FTE		0				-

³¹¹ Website 13 522 € + ReadSpeaker 1240 € + User tests 1665 €.

³¹² 75 €/month.

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Activity	Unit of measure	BE	CY	FI	MT	RO	SI
Maintenance of eligible persons database	FTE		0		75 per month		-
Establishing the database of cardholders	FTE	120,000 Eur	0		-		-
Uploading information of cardholders' database	FTE		0		-		-
Updating information of cardholders' database	FTE		0		-		-
Maintenance of cardholders' database	FTE		0		-		-
Establishing the database of service providers	FTE		0		0.25		
Uploading information of service providers database	FTE		0	0.2			32 h

Activity	Unit of measure	BE	CY	FI	MT	RO	SI
Updating information of service providers database	FTE		0				10 h
Maintenance of service providers database	FTE		0				70 h
Awareness-raising activities	FTE		-	1 ³¹³			-
	EUR	65,000	18,666.47	31,000 ³¹⁴	60,000	14,500	-
Keep the helpline running	FTE		0	0.8	0.75		1,000 h
Produce the Card	FTE				0		-
	EUR (unit cost)	0.14 per Card	2.085 per Card	5.00 per Card	2.50 per Card	1.10 per Card	0.93 per Card
	EUR (overall cost)		10,425	95,211 ³¹⁵			157,258
	EUR (EU funding)		8,340				125.806,40
	EUR (national funding)		2,085				31.451,60
Deliver the Card	FTE						-
	EUR	1.03 per Card	2.00 per Card	-	0.40 per Card	0	-

³¹³ 1 FTE for the first year, 0.5 FTE for the second year.

³¹⁴ Brochures and leaflets 10 000 € (graphic design & print) + Stickers 1200 € m+ Symbol design 400 € + organising the events 9400€.

³¹⁵ Including the ordering system maintenance. At the moment there are 11 601 produced cards in FI.

Activity	Unit of measure	BE	CY	FI	MT	RO	SI
Establishment of security mechanisms	FTE		0	-			-
	EUR		0		_,316		-

Table 44 - Costs incurred by each Member State for each yearly activity

Costs	Year	BE	CY	FI	MT	RO	SI
Management of the Card applications	2015	-	0		0	-	0
	2016	-	0		0	-	15,000
	2017	-	0		2080	0	33,000
	2018	-	1,900		0	0	5,600
Recruitment of service providers	2015	-	0	0	0	-	0
	2016	-	0	0.25	2500	-	5,320
	2017	-	0	0.4	2500	0	5,000
	2018	-	0	0.20 ³¹⁷	500	0	5,000
Managing contacts with the service providers	2015	-	0	_,318	-	-	-
	2016	-	0	_,319	_,320	-	-
	2017	-	0	_,321	_,322	0	-

³¹⁶ Included in the costs of production of the Card.

³¹⁷ Included in the above-mentioned activities related to the database of service providers.

³¹⁸ Included in the activities related to the database of service providers.

³¹⁹ Included in the activities related to the database of service providers.

³²⁰ Included in the activities related to the recruitment of service providers.

³²¹ Included in the activities related to the database of service providers.

³²² Included in the activities related to the recruitment of service providers.

Costs	Year	BE	CY	FI	MT	RO	SI
	2018	-	0	_323	_324	0	-
Managing contact with the competent authorities of the Card	2015		0	0.5	-	-	-
	2016		0	0.5	-	-	-
	2017		0	0.5	-	-	-
	2018		0	0.5	_325	-	-
	2015	-	0	_326	-	-	-
Contacting persons with disabilities	2016	-	0	_327	-	-	-
	2017	-	0	_328	-	0	-
	2018	-	0	_329	-	0	-

³²³ Included in the activities related to the database of service providers.

³²⁴ Included in the activities related to the recruitment of service providers.

³²⁵ Not applicable since the DCNO is the EDC managing authority in MT.

³²⁶ Included in the communication costs.

³²⁷ Included in the communication costs.

³²⁸ Included in the communication costs.

³²⁹ Included in the communication costs.

Costs	Year	BE	CY	FI	MT	RO	SI
Costs incurred to consult civil society organisations	2015	-	0	_330	0	-	
	2016	-	0	_331	3000	-	
	2017	-	0	_332	-	0	

³³⁰ Included to the costs of the managing and organising the events.

³³¹ Included to the costs of the managing and organising the events.

³³² Included to the costs of the managing and organising the events.

Costs	Year	BE	CY	FI	MT	RO	SI
	2018	-	0	_333	-	0	
Improvements of building/vehicle/service	2015						
	2016						
	2017						
	2018						

³³³ Included to the costs of the managing and organising the events.

12. Case studies

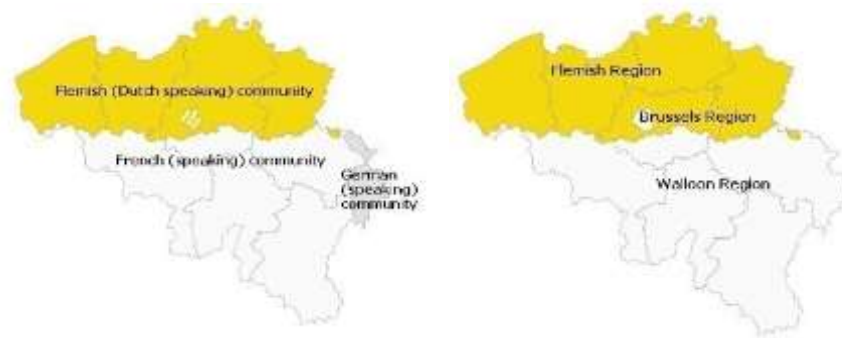
12.1. A co-operation model – The implementation of the Card in a multi-level administrative system

12.1.1. Context

The first Article of the Belgian constitution reports that 'Belgium is a federal state, composed of communities and regions'.

The **administrative division** is based on two criteria: linguistic/cultural and economic. Based on the linguistic/cultural criterion, three Communities are recognised: i) the Flemish Community, ii) the French Community and the iii) German-speaking Community. Each community has its own legislative body, and its own government. The communities are in charge of the policies in the sectors of education, culture, youth welfare and, to some extent, the health sector. Based on the economic criterion, there are three Regions: i) the Flemish Region, ii) the Walloon Region, and iii) the Brussels-Capital Region. Each Region has its own government and legislative body that is responsible for matters such as housing, economy, transportation, public works, the environment, spatial planning, energy, and the land use.

Figure 35- Belgian Communities and Regions³³⁴



The decision-making authority is distributed between the federal level – the federal Government and the federal Parliament – and the regional and community levels. The Belgian federal administrative structure is organised in ministries, which are called Federal Public Services (FPS).

Disability policies are shared between the federal and the regional/community levels. The **federal level** includes two main authorities:

- The Directorate-General for Disabled Persons as part of the FPS Social Security³³⁵. It grants allowances (the income replacement allowance, the integration allowance, the allowance for assistance to the elderly), evaluates the disability (of disabled adults, of children with a disorder or a disability), and issues the parking card for

³³⁴ See at: <https://www.flemishparliament.eu/about-the-flemish-parliament/structure-belgium>.

³³⁵ See at: <https://socialsecurity.belgium.be/en>.

disabled persons and the national public transport reduction card for blind and partially sighted persons to the entitled persons.

- The National Higher Council of Persons with Disabilities (CSNPH)³³⁶ regularly issues opinions in areas such as allowances for disabled people.

Three main disability schemes are managed at the federal level by the National Institute for Health and Disability Insurance³³⁷ and the Federal Agency for Occupational Risks³³⁸: i) the invalidity insurance scheme, ii) the scheme for accidents at work, iii) the occupational diseases scheme³³⁹. The benefits provided under these schemes are financed through direct workers' contributions. Additionally, the FPS Social Security³⁴⁰ is in charge of the scheme for allowances for persons with disabilities, which does not require any direct contribution from taxpayers.

The **regional/community level** includes four bodies, each responsible for implementing disability policies in its specific region/community of reference:

- The Flemish Agency for Persons with Disabilities (VAPH) in the Flemish Region³⁴¹;
- The Walloon Agency for the Integration of people with disabilities (AViQ) in the Walloon Region³⁴²;
- The Phare Service in Brussels-Capital Region³⁴³;
- The Service for Persons with Disabilities in the German Community (DSL)³⁴⁴.

Additionally, there are agencies for Dutch-speaking persons in the Brussels-Capital Region such as Brussels Regionaal Overleg Gehandicaptenzorg' (BROG), the Brussels Aanmeldingspunt voor Personen met een Handicap³⁴⁵, both representing the contact points for the Dutch-speaking disabled persons in Brussels.

Regions are competent for local policies such as urban development, accessibility of buildings, mobility, culture and tourism. Communities are competent in the field of education, professional training and welfare of persons with disabilities. Communities also grant contributions for technical aids and integrated education to persons with disabilities. Regions and communities have both competencies over policies in the field of youth welfare, also as far as policies related to children with disabilities.

³³⁶ See at: <http://www.kenniscentrumwwz.be/personen-met-een-handicap-en-inclusie>.

³³⁷ See at: <https://www.inami.fgov.be/fr/Pages/default.aspx>.

³³⁸ See at: <https://www.fedris.be/en>.

³³⁹ See at: <https://socialsecurity.belgium.be/sites/default/files/disabled-persons-policy-belgium-en.pdf>,
<https://socialsecurity.belgium.be/sites/default/files/content/docs/nl/publicaties/boek-armoede-en-handicap-in-belgie-2019-nl.pdf>.

³⁴⁰ See at: <https://socialsecurity.belgium.be/en>.

³⁴¹ See at: <https://www.vaph.be/en/welcome>.

³⁴² See at: <https://www.aviq.be/handicap/>.

³⁴³ See at: <https://phare.irisnet.be/>.

³⁴⁴ See at: <https://selbstbestimmt.be/>.

³⁴⁵ See at: <http://www.brap.be/>.

12.1.2. The Card System

The governance scheme

In Belgium, the EU Disability Card (hereafter the Card) was launched in February 2016. For the purpose of the Card, the FPS Social Security decided to establish a **Steering Committee** specifically concerned with the management of the Card, including the following bodies:

- FPS;
- AViQ;
- VAPH;
- Service Phare;
- DSL;
- Crossroads Bank for Social Security³⁴⁶(CBSS).

The **FPS** is in charge of leading the Card project and it is responsible for coordinating the different actors involved in the Steering Committee to ensure the effective functioning of the Card system. In addition, the FPS represents the Steering Committee at the European level and collaborates with the Commission and the other Member States. **The regional public institutions** in the field of disability are responsible for the management and functioning of the Card in their regions of competency, notably i) Service Phare in the Brussels-Capital Region, ii) AViQ in the Walloon Region, iii) VAPH in the Flemish Region and iv) DSL in the German-speaking community. In particular, each institution is responsible for assessing the eligibility criteria of persons with disabilities to be entitled to disability status. They are the authorities responsible for the assessment and processing of the applications to request the Card³⁴⁷. Each institution also plays a key role in carrying out consultation with stakeholders not directly involved in the management of the Card. For instance, the regional authorities incentivise the participation of service providers and civil society organisations in their competent territories, as well as relevant regional ministries for the organisation of awareness-raising campaigns in the country. Finally, each institution advertises the Card on its websites.

The **CBSS** plays a technical and functional role as it was involved in the Steering Committee with the specific aim of developing a system to allow sharing of information between the public institutions and the private entity (See 2.2).

As for the production and the delivery of the Card, the Steering Committee outsourced the activities since the public members of the Committee lacked expertise and specific skills to manage them. Moreover, following the example of the EU Parking Card³⁴⁸ where a **private entity** was involved, the Steering Committee followed the same approach in the context of the EU Disability Card. A public tender was launched for the production and delivery of the Card, and an agreement was signed between the Steering Committee and the private entity.

³⁴⁶ <https://www.ksz-bcss.fgov.be/en>.

³⁴⁷ The FPS - Social Security accepts the applications completed on the EU Disability Card's website and those sent by postal mail. In the Walloon Region and Brussels-Capital Region, AViQ and Phare Service can be contacted in person, by phone, fax or e-mail. In the German-speaking community, DSL accepts the application through the direct contact of persons at their offices. In the Flemish Region, VAPH, the application can be submitted through an online request directly on the website.

³⁴⁸ https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/belgium/index_en.htm.

The initial agreement lasted three years with the possibility of extending the period of the contract.

Functioning of the Crossroads Bank for Social Security

In 2001, the federal government adopted e-government procedures with the aim of improving the delivery of public services for Belgian citizens and business. An e-government agreement³⁴⁹ was signed between the Federal state, the Flemish, French and German-speaking communities, the Flemish, Walloon and the Brussels-Capital regions, the Commission Communautaire Commune (COCOM)³⁵⁰ and the French Community Commission (COCOF)³⁵¹. The agreement laid down a cooperation framework, according to which all governance layers are committed to adopting common standards, the same technical instruments, and the electronic signature. The e-Government programme mainly focused on:

- Re-engineering and integrating service delivery around user's needs and life events;
- Strengthening cooperation between all levels of government to provide integrated services across organisations from different regions and communities and administrative layers;
- Simplifying administrative procedures for citizens and business, through an increased exchange and sharing of data between government departments and agencies;
- Ensuring integration and protection of personal data.

The federal e-government strategy aimed at establishing one unique Public Administration system where it was possible to jointly merge the different competences of all government bodies and administrative layers³⁵². The **CBSS** has been identified as the key actor. The system was established based on cooperation between the CBSS and the different social security institutions and it was aimed at ensuring data sharing. The CBSS is responsible for coordinating the e-government strategy and actively participates in the implementation and management of projects in the social sector. The CBSS interconnects the back-office applications for social security services managed by different regional agencies, with the aim of collecting, managing and exchanging information and data in a standardised format. The information sharing takes place through an integrated functional interoperability platform, ensuring data protection measures. The Reference Registry is the key tool for routing all information to the social security authority of interest, based on agreed definitions and access authorisation across the social security sector. The Registry includes three databases: available data (which agency holds data, and for what purpose), access authorisations (who can access the information), and directory of persons (which agencies have dossiers on individuals, and for what time period). The combination of information in these three databases allows each query to be routed to the appropriate agency, and eligibility for social services to be determined.

The cooperation model

Considering the administrative complexity of Belgium, the development of the Card system involved two main agreements about i) the funding mechanism and ii) data and information exchange.

³⁴⁹ <https://joinup.ec.europa.eu/sites/default/files/document/2014-12/media1968.pdf>.

³⁵⁰ <https://www.ccc-ggc.brussels/>.

³⁵¹ <https://www.spsf.brussels/>.

³⁵² eGovernment Programme of the Belgian Social Sector (2009-2014).

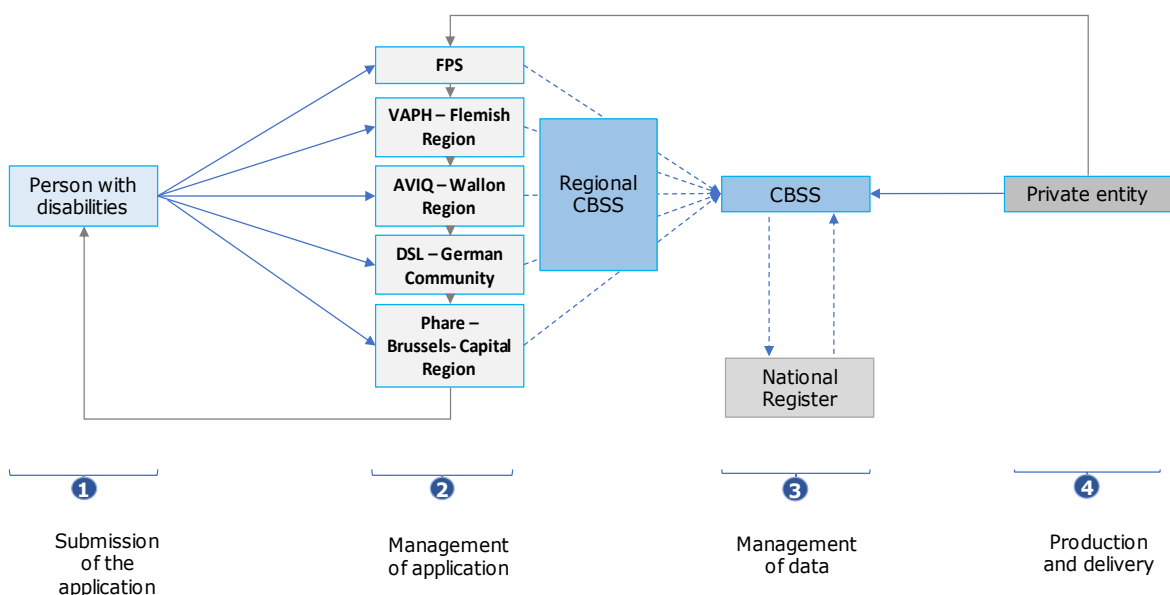
The five ministries in the field of disability are responsible for the **funding** of the Card system. With some delays, an agreement was signed that established that each partner would be liable for the financial amount related to the production of Cards in its region. The agreement was made flexible to allow renegotiation of the shares paid by each institution. The share was established considering the size of the population with disability status registered in each region/community.

As for the **exchange of data**, the development of the Card required building a structured system to exchange data between the public institutions and the private entity responsible for the production of the Card. The Steering Committee was interested in developing a flexible system for persons with disabilities to facilitate their applications to request the Card, thus allowing them to apply at the regional level. However, this created the need for strong coordination and integration of data and information. The aim was to establish a unique national database containing the information on the Cards issued by the different regional institutions to facilitate the functioning of the Card system. An existing web service within the CBSS was identified as the way to connect all actors, thus establishing an information sharing infrastructure involving:

- The persons with disabilities
- The public institutions in the field of disability
- The CBSS
- The private entity

The system became active and operational in 2017. Persons with disabilities can apply for the Card either at the federal or the regional level and send the application form to the relevant institution in the region where they are registered. The data registered by the institutions are sent through the regional Crossroad Banks to the federal CBSS where the data are stored in a unique database. The CBSS is responsible for validating the application by consulting the National Registry³⁵³ and then for sending the data to the private entity responsible for the production and delivery of the Card.

Figure 36 – The cooperation mechanism from the application to the delivery of the Card



³⁵³ See at: <https://www.ibz.rn.fgov.be/fr/registre-national/>.

The respect of data protection rules is guaranteed and follows the national guidelines on the matter, and GDPR requirements³⁵⁴. The CBSS requires that any project meets specific rules, and the national Information Security Committee³⁵⁵ is established within the CBSS. This Committee is responsible for performing specific tasks on information security such as undertaking deliberations for certain types of exchanges of personal data. As for the Card system, all these rules and guidelines are strictly followed in the context of the Card's scheme. In particular, the personal data are property of the institutions in the field of disability. The CBSS provides the mechanisms to check the data, and transfers only the data required by the private entity to print the Card. Moreover, data of beneficiaries remain online for six months and are then stored offline for ten years.

In addition to national rules about the protection of personal data, there is no mechanism ensuring the protection of data should the Card be lost or stolen; all information used to personalise the Card is readable on the Card itself, and no microchip is used as a deterrent mechanism against theft of the Cards.

The **collaboration model** was successful thanks to long-standing and very structured cooperation between the members of the Steering Committee, who were used to working together even prior to the introduction of the Card. In particular, FPS, AViQ, VAPH, Service Phare and DSL were part of a working group on "Disability matters" within the FPS. This pre-existing cooperation practice allowed the establishment of the Steering Committee in a very short time span and allowed them to respond to the Card's Call for Tender accordingly. Once the pilot started, the Steering Committee adopted a very collaborative approach, with monthly meetings organised to jointly define the implementation strategy of the Card system. Structured collaboration, together with a high level of trust between the different members who knew each other for a long time, allowed for finding common solutions for the proper management of the Card, including its funding and financial sustainability. In addition, previous experience with the EU Parking Card allowed the Steering Committee to quickly and properly identify the main implementation needs and define tailored solutions, including the involvement of the private entity in the Card's scheme.

12.1.3. Conclusions and recommendations

Potential transferability

The Belgian case showed itself to be successful in implementing the Card within a multi-level administrative system thereby illustrating process effect. Considering the complex administrative and legal context, the bodies involved in the Card system were able to:

- Establish a Steering Committee involving different public authorities, a private entity and representatives of the civil society such as the Conseil Supérieur National des Personnes Handicapées (CSNPH) and the Belgian Disability Forum (BDF);
- Create a unique infrastructure for the exchange of data between the public authorities in charge of the management of the Card and the private entity responsible for its production and delivery.

The assessment of the transferability of the Belgian experience to another potential implementation context should take into account the *conditio sine qua non* for its success: the pre-existing and previous collaboration between the actors concerned. Cooperation and trust take time; hence it is difficult to be able to set up well-functioning collaboration systems

³⁵⁴ GDPR is respected both by CBSS (<https://www.ksz-bcss.fgov.be/fr/protection-des-donnees/en-pratique/reglement-general-relatif-a-la-protection-des-donnees>) and by the private entity responsible for the Card's production and delivery (<https://www.multipost.com/data-security/>).

³⁵⁵ See at: <https://www.ksz-bcss.fgov.be/fr/protection-des-donnees/comite-de-securite-de-linformation-csi>.

in the short term. In such a context, the implementation of the Card in **a multi-level context would benefit from the involvement of actors which are already used to collaborating with each other at the national level**. This would facilitate the division of tasks and responsibilities among different administrative levels with a twofold advantage. From the institutional perspective, the Belgian case shows that cooperation and trust contributed towards the efficiency of the system, with a clear division of roles and financial commitment of all the actors. From the perspective of the beneficiaries, the cooperation model showed itself to be **“user-friendly”**, allowing **persons with disabilities** to apply from within different regions where they reside, know the responsible authorities and institutional working mechanisms, **face no language barriers** and **can receive support from local associations they belong to**. This would directly reduce the overall burden and information costs they must assume.

Impact on mobility

There is no statistical evidence allowing conclusions to be reached on the impact of the Card on the mobility of persons with disabilities, both across regions and across Member States. Data are available on the number of Cards issued, but not on the use of the Card by beneficiaries when accessing services provided. Moreover, there are no data allowing to assess whether the Card contributed to increase the number of service providers offering benefits to persons with disabilities. Despite this general lack of statistics and monitoring data, the feedback provided by the members of the Steering Committee with respect to the impact of the Card is positive. Notably:

- In the **Flemish Region**, there is a significant participation of service providers in the Card system. After two years following the launch of the Card, there is a capillary involvement of service providers. In particular, out of 300 Flemish communities, service providers are aware of the Card in around 50 communities. Moreover, there is an increasing demand from the service providers to receive promotional material to advertise the Card.
- In the **Walloon Region**, there is no direct contact with the service providers involved in the Card system. Therefore, it is not known if the service providers participating in the Card system have already provided benefits to persons with disabilities, and if there was an increase in service providers offering benefits. Moreover, AViQ is directly committed to ensuring the expansion of the number of service providers acknowledging the Card through the organisation of events, particularly in the tourism and sport sectors.
- In the **German-speaking Community**, all the major service providers in the sectors of culture, leisure and sport were reached and currently participate in the Card. Most of the service providers involved already offered benefits to persons with disabilities prior to the introduction of the Card and then they joined the Card's scheme. Most recently, the local football club league became a partner of the Card's scheme.

To conclude, an interesting suggestion was provided by a representative of DSL. According to this stakeholder, the creation of an electronic format of the Card would ease the monitoring and collection of data on the Card's use, since the system would allow tracking the usage of the Card with the service providers where the Card is used. Such a system could be implemented only in compliance with the data protection rules, including GDPR requirements. The Steering Committee is not planning to implement such a system for now.

Sustainability

Since the beginning of the project, the Steering Committee established a system to ensure the financial sustainability of the Card.

As already mentioned, the five institutions signed an agreement for the funding of the Card system considering the share of the population of persons with disabilities associated with each institution. The agreement was flexible in order to adjust the percentage of the funding for each institution over time. The existing collaboration and high level of trust among institutions was key in achieving such a guarantee mechanism for the sustainability of the Card over the long run.

After two years from the beginning of the project, the Steering Committee is satisfied with the functioning of the Card and no issues emerged with respect to the funding scheme at the national level.

Areas for improvement and suggestions for future policy action

Three main areas for improvement emerged:

- **Communication of the Card:** overall, the Card is well known in BE and there is an increasing number of persons with disabilities applying for the Card. Despite this interest in the Card, according to Members of the Steering Committee, national awareness-raising activities could be strengthened in order to reach even more persons with disabilities and service providers. For instance, there is a great interest in also involving organisations active in the field of accessibility that already provide benefits to nationals with disabilities such as Inter in Flanders and Le Collectif Accessibilité Wallonie Bruxelles (CAWaB) in Wallonia (and Brussels).
- **Use of the Card at the regional level:** while the functioning of the Card addresses the needs of persons with disabilities in the Walloon Region and in the German-speaking Community, the situation is slightly different in the Flemish Region. In the Flemish Region, there are other agencies responsible for persons with disabilities in addition to VAPH, such as the Agency of Childhood³⁵⁶. People who are registered with the Agency of Childhood and are not recognised as persons with disabilities by the VAPH are not eligible to apply for the Card. In order to include this category of persons with disabilities, it is important to understand how to adapt the Card system to this need. In particular, the possibility to include the Agency in the Steering Committee should be considered.
- **The limited number of Member States using the Card:** BE is a small country and the surrounding Member States, i.e. France, Germany, Luxembourg, Netherlands, do not participate in the Card pilot. The interest towards the Card by persons with disabilities is directly related to the possibility to use it in other Member States. For instance, many persons with disabilities applying for the Card in the German-speaking Community usually travel to Germany for cultural, sports and leisure activities. Thus, the fact that DE do not participate in the Card system may limit the interest of these persons to apply. According to the Steering Committee, the **participation of other Member States** would boost the use of the Card and its related impact. Extending the Card to all Member States is perceived as a key element for ensuring the continuity of the Card in the long run. In particular, the Steering Committee highlighted the risk in continuity of the Card's use if there are no other nearby Member States implementing it. In particular, regional and national politicians may not see the added value of using the Card if other countries do not

³⁵⁶ <https://www.opgroeien.be/>

adhere to the initiative since the advantages of travelling abroad are limited to few countries that might not correspond to the favourite destinations of nationals with disabilities. Moreover, the participation of other Member States would increase the overall sharing of experiences and good practices between Member States, which emerged as an additional added value of the extension of the Card to other and possibly all of the EU Member States.

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12.2. Nudging service providers: the public transport case

12.2.1. Purpose and scope of the case study

The **EU Disability Card** envisions benefits for persons with disabilities in four areas: culture, leisure, sport as well as transport (both public and private). However, it is at discretion of each Member State to decide which of these sectors is included in the national package of benefits. While the culture, the leisure and sport sectors are covered in all pilot Member States³⁵⁷, the transport sector is covered only in three Member States, i.e. CY, FI and MT. Notably, private transport operators participate in the Card's scheme in CY (coach operators) and MT (taxi operators), whereas in FI both public and private transport operators are involved. In SI, the public transport sector is expected to be covered starting from 1 July 2020³⁵⁸.

This case study aims to **investigate why service providers did not choose to join** the Card's system in all participating Member States, and how they can be drawn into it.

Table 45 provides an overview of the transport means managed by public transport operators in each Member State in scope.

Table 45 - Public transport means³⁵⁹

Member State	Airplane	Bus ³⁶⁰	Coach ³⁶¹	Subway/tram	Train
BE	Private	✓	✓	✓	✓
FI	✓	✓	Private	✓	✓
MT	✓	Private	Private	Transport means not available in the country	Transport means not available in the country
RO	✓	✓	Private	✓	✓
SI	Private	✓	Private	Transport means not available in the country	✓

Source: Authors' elaboration based on desk and field research

³⁵⁷ MT is the only pilot Member State not covering the sport sector.

³⁵⁸ Source: Focus Group with the transport managing authorities and focus group with the transport operators.

³⁵⁹ Authors' elaboration.

³⁶⁰ This includes urban buses only.

³⁶¹ Coach should be intended as extra-urban bus.

12.2.2. State of play on the provision of benefits to persons with disabilities outside the Card's scheme

The provision of benefits to persons with disabilities by national public transport operators outside the Card's scheme

As shown in Table 45, in all Member States, public transport operators provide benefits to nationals with disabilities outside the Card's scheme. An exception is the public airline operators, which do not envision disability-related benefits³⁶².

Notably, in BE³⁶³, RO and SI all public transport operators except airlines offer benefits both to persons with disabilities and their personal assistants. However, whilst in BE the benefits are offered to all persons with disabilities, in RO and SI benefits target only certain categories of persons with disabilities. Specifically, in RO benefits are only offered to persons with severe and accentuated disabilities. In SI, war invalids and personal assistants are entitled to a 75% discount on trains, while their personal assistants and persons with visual impairments travel for free. War invalids are also entitled to free transport of wheelchairs by train. War veterans and their companions are entitled to four one-way or return free train journeys per year. Finally, in FI, persons with disabilities do not receive direct financial benefits, but their personal assistants travel for free³⁶⁴.

Table 46 – Provision of benefits³⁶⁵ to persons with disabilities per Member State³⁶⁶

Member State	Airplane	Bus	Coach	Subway/tram	Train
BE	Private	Free ticket for persons with disabilities and personal assistants	Free ticket for persons with severe visual disabilities and personal assistants ³⁶⁷ . Free transport of a guide dog and assistance dog.	Free ticket for persons with disabilities and personal assistants	Free ticket upon display of a public transport reduction card; Free ticket for the assistant; Free transport of a guide dog.
FI	No benefits offered ³⁶⁸	Free ticket for personal assistants	Private	Free ticket for personal assistants	Free ticket for personal assistants
MT	No benefits offered	Private	Private	Private	Private

³⁶² In the EU, airlines operators comply with the EU Regulation 1107/2006, establishing rules for the protection of and provision of assistance to persons with disabilities and persons with reduced mobility travelling by air, both to protect them against discrimination and to ensure that they receive assistance (art. 1). See at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006R1107>.

³⁶³ In BE, bus, tram and subway are managed at community level, whilst railway operators are managed at federal level.

³⁶⁴ This is based on a human rights-based approach to disability, according to which persons with disabilities are considered on an equal basis with other individuals. Hence, they are not exempted from paying fees to enjoy benefits, but in case they need a personal assistant to fully enjoy a service, the personal assistant is exempted from paying the fee. In this manner, persons with disabilities are considered on an equal footing with other persons, but no additional burden is imposed on them in case they are not self-sufficient.

³⁶⁵ This table refers only to financial benefits provided to persons with disabilities and/or their personal assistant. Other types of benefits/services (e.g. accessibility requirements and assistance services) have not been considered since these have not been included in the Card's national package of benefits. Hence, their analysis is not deemed relevant for the purposes of a comparison of the state of the art prior to and after the introduction of the Card.

³⁶⁶ Author's elaboration.

³⁶⁷ In BE, assistants are granted free tickets upon display of an assistant card.

³⁶⁸ Source: consultation with the transport operator during the Focus Group.

Member State	Airplane	Bus	Coach	Subway/tram	Train
RO ³⁶⁹	No benefits offered	Free ticket for persons with severe and accentuated disabilities and personal assistants	Private	Free ticket for persons with severe and accentuated disabilities and personal assistants	Free ticket for persons with severe and accentuated disabilities and personal assistants
SI	Private	Free ticket for persons with severe and accentuated disabilities and assistants	Free ticket for persons with severe and accentuated disabilities and assistants	Transport means not available in the country	Free ticket for some categories of persons with severe and accentuated disabilities and their personal assistants

Source: Authors' elaboration based on desk and field research

12.2.3. Public support schemes for the provision of benefits to persons with disabilities in the public transport sector outside the Card's scheme

The provision of benefits to nationals with disabilities is based on a **public support scheme** in FI, RO and SI. The support scheme is managed at different administrative levels according to the specific Member State's administrative and legislative system. It may either entail direct subsidies to public transport operators (BE, RO, SI) or be based on a refund scheme (FI).

In BE, public support schemes for train operators are at the national level, whereas public support schemes supporting bus, tram and subway operators are at regional level. In FI, public transport operators do not receive financial support to provide free tickets to the personal assistants of persons with disabilities. However, the cost of such tickets is supported by the municipality of residence of the person with disability, where personal assistants can obtain a refund for the cost of the ticket. In SI, the state financially supports public transport-related benefits only for unemployed citizens, while employees' transport tickets are fully borne by the employer (regardless of its private or public nature). In SI, the support scheme is defined in state concession agreements regulating the provision of public transport services. Finally, in RO, benefits provided by public train operators are state-subsidised, whereas benefits related to buses, subways and trams are subsidised by local public authorities.

Table 47 – Public support schemes in the public transport sector per Member State³⁷⁰

Member State	Type of public support provided to public transport operators
BE	No public support scheme in place specifically supporting the provision of benefits to persons with disabilities; however, since the sector is generally subsidised, operators may support disability-related benefits through the general subsidies they receive (bus, coach, subway, train, tram)
FI	Free ticket for the personal assistants is reimbursed by municipalities (bus, subway, train, tram)

³⁶⁹ In RO, benefits are offered for a limited number of trips per year, respectively 6 return tickets for persons with accentuated disabilities and 12 round trips for persons with severe disabilities and personal companions/assistants (bus, subway/tram, train).

³⁷⁰ Authors' elaboration.

Member State	Type of public support provided to public transport operators
MT	No public support scheme in place
RO	Free ticket for persons with severe and accentuated disabilities and personal assistants supported by the Ministry of Transport (train) Free ticket for persons with disabilities and personal assistants subsidised by local authorities (bus, subway and tram)
SI	State subsidies concern civilian war invalids who are not in employment ³⁷¹ (bus, coach, train).

Source: Authors' elaboration based on desk and field research

12.2.4. The introduction of the EU Disability Card

Coverage of the public transport sector across Member States

Following the **introduction of the Card**, public transport operators have been involved in the Card's scheme in FI since the beginning of 2020, whereas in SI they are expected to be included as of 1 July 2020. In both countries, the Card covers – is expected to cover - trains and intercity coaches.

In FI, participation of transport operators in the Card's scheme and the related definition of the national package of benefits is voluntary. As an illustration, in the Finnish coach sector, the package of benefits is decided at the level of each company. However, the different bus companies in the main cities, i.e. Tampere and Helsinki, mainly adopt the same rules (i.e. full price for persons with disabilities and free tickets for their personal assistants)³⁷². In SI, the participation of public transport operators in the Card's scheme is established by law. The decision to include the transport sector in the Card's scheme was a top-down decision adopted by the Parliament in September 2019 without involving transport operators³⁷³. However, service providers are negotiating the financial conditions of their participation in the Card's scheme, which will be defined in the state concession agreement regulating public transport services provision.

In both countries, the Card has not introduced new benefits, rather it has extended the same benefits already in place for nationals to foreigners with disabilities³⁷⁴. All these benefits are covered by public support schemes currently in place.

In the other Member States, public transport operators have not been included in the Card's scheme and the same benefits offered prior to the Card continued to be offered only to nationals with disabilities (BE, MT³⁷⁵, RO). Notably, in MT, only private transport operators participate in the Card's scheme, whereas, in BE and RO, the transport sector is not covered at all.

³⁷¹ The state subsidises return railway or bus tickets for war veterans. In the case of civilian war invalids, the state subsidises 57% of the return railway or bus tickets, up to a maximum of five times per year.

³⁷² Source: Focus Group with key transport operators.

³⁷³ In November 2019, the Slovenian parliament adopted law setting forth that EU Disability Cardholders can use public transportation (coach, train and intercity transport) free of charge if they are unemployed. Such legislative provision will enter into force on 1 July. Source: Focus Group with key transport operators.

³⁷⁴ Since in SI free transport services are granted only to unemployed persons with disabilities, a discussion is ongoing on whether to keep the unemployment requirement for granting transport benefits also to foreign Cardholders. However, this would entail a possible discrimination. Indeed, Slovenian nationals who are employed would still be granted these benefits, since these are covered by their employer based on national legislation. On the other hand, foreigners who are not in employment would not be granted any benefit with the Card.

³⁷⁵ In MT, the Card covers the private transport sector, with the involvement of taxi operators.

Key factors incentivising/hampering service providers' participation

The introduction of the Card in the transport sector might entail additional **financial burden** mainly linked to the extension of existing tariff reductions/gratuities to a larger pool of beneficiaries. In fact, in the countries where public transport was covered, benefits were not modified or increased in their financial amount, but rather extended to a larger pool of beneficiaries (i.e. foreigners with disabilities).

Interestingly, in these countries **public support schemes** were already in place prior to the introduction of the Card. This seems to suggest that the presence of a well-established financial support scheme for transport operators may facilitate their involvement in the Card's scheme. From the perspective of transport operators, the presence of financial support may indeed act as an incentive to participate in the Card by ensuring clear financial conditions for participation since the beginning of the service provider recruitment process. From the standpoint of institutional actors (e.g. DCNO, Ministry of Transport), an already existing public support scheme would facilitate finding smoother and more expeditious legal solutions instead of passing new laws or amending state concessions. In FI, the existing scheme was indeed not modified, but existing subsidies served as a framework to financially support the introduction of the Card in the sector.

In SI, the introduction of the Card found its legal basis in a law adopted in 2019 and the financial conditions for transport operators' will be included in concession agreements that regulate the provision of transport services in the country. This may have delayed the introduction of the Card in the sector, expected to occur only in July 2020, suggesting that, even when a public support scheme is already in place, the involvement of transport providers may still face administrative and legal obstacles.

The assessment of the key factors that hamper and/or incentivise the participation of transport service providers should consider the nature of their participation: i.e. voluntary or mandatory. In the former case, it is essential that service providers receive **complete and accurate information on the Card**. Without clear information on the administrative and financial schemes behind its implementation, transport operators would in fact lack the financial incentives to join the scheme and would instead risk being dissuaded by the fear of financial losses. Conversely, providing transport operators with clear and comprehensive information on the rationale and objectives surrounding the Card can be pivotal in leveraging non-financial incentives such as commitment to social inclusion, branding, etc. In such a situation, awareness-raising of the Card appears to be crucial in order to encourage voluntary service provider participation in the scheme. In this sense, the Finnish experience, in which the DCNO played an active role in bringing the main railway operator into the system, shows that the political commitment of the recruiting authority is crucial.

When participation of transport operators is state-mandated, as evidenced by the Slovenian case, the recruitment process is not necessarily automatic, but negotiations involving different stakeholders, such as the transport operators, the ministries competent in the transport sector and the DCNO may be needed. Negotiations may concern the details of the administrative and financial scheme of the Card, the identification of the package of benefits and the pool of beneficiaries, etc. In the Slovenian experience, discussions are ongoing concerning the potential extension of the target group of disability-related benefits and the related supporting financial measures. This underlines the relevance of discussing financial issues during the negotiation stage, suggesting that **early identification of the authority that will be in charge of covering the costs of the Card** plays an important role towards the success of such negotiations.

With regard to the disincentives that may discourage service providers to participate in the scheme, it is worth mentioning the issue of **accessibility of transport facilities**. In the concerned Member states, consulted stakeholders highlight that making transport means accessible is the *condition sine qua non* to ensuring a successful implementation of the

Card. The concerns expressed by the transport stakeholders suggest that limited accessibility not only hampers the effective implementation of the Card but can also act as a disincentive for transport operators to participate in the scheme. In fact, the risk is that transport operators perceive no added value of their participation in the Card's scheme.

12.2.5. Conclusions and recommendations

Potential transferability

The analysis of the potential transferability of the Finnish and Slovenian experiences to different implementation contexts looks at the causal mechanisms that might explain the participation of public transport operators in the observed Member States. The extrapolation of these mechanisms allows identifying possible success factors that are likely to generate similar results in other potential implementation contexts. In other words, the understanding of the key conditions facilitating participation in FI and SI might inform other Member States that want to involve the public transport scheme in their national Card's schemes.

Three main causal mechanisms have been identified as supporting participation:

- **Political commitment:** regardless of the voluntary or mandatory nature of the participation of public transport operators, the transferability of the model is directly related to the political willingness of the institutional actors involved as well as to their level of commitment to the social inclusion of persons with disabilities. Both the FI and SI cases show that the public sector played a key role in promoting the inclusion of the public transport sectors within the national Card's schemes. In FI, where the participation is voluntary, the DCNO contacted and involved the national railway to negotiate its participation in the scheme from the beginning of the process. In SI, the government decided unilaterally to cover public transport services within the Card's scheme, thus making participation of related transport operators mandatory.
- **Pre-existence of a public support scheme:** both the countries where the public transport sector is covered already subsidised transport services at the national level, thus the public support scheme was used to cover the benefits and services offered under the Card's scheme. This represented a win-win situation for transport operators and public authorities. Transport operators were incentivised to participate since they did not bear any financial burden; this was crucial, since the fear of financial losses is likely one of the main reasons for service providers not to adhere to the Card. Public institutions could rely on an existing and well-known public support scheme without any additional legislative and policy steps. This is important in light of the complexity of the transport sector, with different administrative and policy levels in charge of managing transports in their areas of competence, which might disincentivise the participation of service providers in the Card's scheme.
- **Provision of timely and comprehensive information** about the Card: as illustrated by the Finnish case, when participation in the scheme is left at the discretion of transport operators, the active role played by the DCNO in raising awareness about the Card among public transport operators and the broader civil society was pivotal. Indeed, this contributed to minimising possible resistances among transport operators and increasing their positive attitude towards the Card's objectives, thus encouraging them to participate. In turn, this facilitated the DCNO in leveraging both financial and non-financial incentives, coupled with the pressure of a highly sensitised public opinion concerning social inclusion.

Internal and cross-border mobility

There is no statistical evidence that allows making conclusions on the impact of the Card on the mobility of persons with disabilities, both within and across Member States. Only in SI, a monitoring system is in place in the railway sector, keeping track of the number of persons using the benefits offered. Upon monthly transmission of these data to the Ministry of Labour, Family, Social Affairs and Equal Opportunities, the railway company receives refunds. Accordingly, after the introduction of the Card, Cardholders will be monitored as well, allowing data gathering on the usage of the Card.

Social acceptance

Two key factors emerged as enhancing the social acceptance of the Card among transport operators and civil society. Notably:

- **Simplification:** the case of the Finnish intercity bus sector, where three different local cards were in place prior to the EU Disability Card, shows that the Card contributed towards administrative simplification, thus it was welcomed by concerned transport operators.
- **Proof of disability:** the Card is an EU proof of disability certifying the disability status of passengers, thus easing the recognition of the condition of disability by transport operators; this is particularly important in case of invisible impairments, since Cardholders may be granted services and benefits (e.g. priority boarding) without having to provide any additional proof of their status.

Areas for improvement

The main areas for improvement that emerged are:

- **E-ticketing:** although economic transactions in the transport sector often take place online, it seems that the Card does not always allow the possibility to obtain the discounts when purchasing online tickets. The possibility to use the Card also when buying e-tickets would arguably increase its adoption.
- **Monitoring:** this case study has highlighted a generalised lack of evidence on the number of persons with disabilities who benefit from economic advantages when using the Card within the public transport sector. Since the transport sector is generally subsidised, a good practice may be drawn from the Slovenian and the Romanian experiences, where the railway operator is obliged to provide periodic statistical evidence to the Ministry of Labour, Family, Social Affairs and Equal Opportunities. This suggests that making the provision of subsidies to transport operators conditional on the transmission of periodic statistical data may serve to address the issue of the lack of monitoring data on the Card in this sector.
- **Passenger intermodality:** since transport is increasingly multimodal³⁷⁶, in order to reach a broader range of users in the transport sector, the Card should ensure that the benefits available for persons with disabilities are equivalent throughout the entire journey.
- **Human rights-based approach:** the effectiveness of the Card is directly related to a shift in mindset. From a legal standpoint, in order to be treated in an equal manner,

³⁷⁶ Multimodality is a type of commuting that involves the use different transport modalities during the journey. See at: https://ec.europa.eu/transport/themes/logistics-and-multimodal-transport/multimodal-and-combined-transport_en.

persons with disabilities should not be entitled to receive “benefits” but should be granted “rights”. Accordingly, if communication platforms convey the message that persons with disabilities should be granted “benefits”, they put the emphasis on the “disability” aspect, overshadowing the social inclusion discourse. This arguably reinforces a vicious circle that should instead be overcome through the Card.

12.3. Management of service providers across Member States

12.3.1. Purpose and scope of the case study

Different mechanisms are in place at the national level for the management of service providers. Recruiting mechanisms may include reference to national legislation provisions, formal agreements with the DCNOs, voluntary participation and exchanges of information. The case study examines how the recruitment and management of service providers occur within different national contexts.

This case study covers the six pilot Member States where the Card has been implemented and the service providers have been formally involved in the Card's scheme, i.e. BE, CY, FI, MT, RO and SI.

12.3.2. Policy and legislative framework of reference

Provision of benefits to persons with disabilities in the sectors in scope outside the Card's scheme

This section provides an overview of the state of the art of benefits provision to persons with disabilities outside the Card's scheme in the different Member States and explores public support schemes for service providers offering these benefits prior to the introduction of the Card.

The **provision of benefits to nationals with disabilities** can be mandatory or left at the discretion of service providers depending on the Member State and specific sector. Notably, it is left at the discretion of service providers in all sectors in scope in BE, FI, MT. In CY and SI, it is at discretion of the service providers in the culture, leisure and sport sectors; however, transport service providers receive subsidies from the government to provide benefits to nationals according to specific criteria. In RO, there are different legislative provisions depending on the degree of disability³⁷⁷. Notably, national legislation recognises four degrees of disabilities and legislatively mandated benefits only concern accentuated or severe disabilities leaving out moderate or light disabilities³⁷⁸. Additionally, in CY³⁷⁹ and MT³⁸⁰, a National Disability Card was in place prior to the EU Disability Card, covering the four sectors in scope, but service providers' participation in these schemes was voluntary.

Prior to the introduction of the Card, the provision of benefits to nationals with disabilities was not supported by any **public support scheme** in BE, CY and FI, whilst in MT and SI³⁸¹ public subsidies were envisioned for transport operators. In RO, public service providers offering benefits to persons with disabilities were supported directly by the state budget,

³⁷⁷ It is compulsory for national (provided by the state) cultural/sports/touristic/leisure providers to facilitate the access of persons with disabilities. As such, children with disabilities and their personal assistant receive free access to museums, shows, artistic and sports manifestations. Adults with severe disabilities and their personal assistants benefit also receive free entrance to the above activities, whereas adults with light or medium disabilities benefit from the same reduced-price entry as students.

³⁷⁸ Source: focus group with the DCNO.

³⁷⁹ In CY, the National Disability Card is called "Social Card". See at: <http://www.mlsi.gov.cy/mlsi/sid/sidv2.nsf/All/A4C6FBAEF037C466C2257BBA0039174F?OpenDocument>.

³⁸⁰ In MT, the National Disability Card is called "Special Identity Card – SID".

See at: <https://crpd.org.mt/services/sid-eu-card/>.

³⁸¹ In SI public transport operators received subsidies to provide benefits to a limited target pool among persons with disabilities, including war veterans and civilian war invalids.

both at the national and local level (e.g. Ministry of Culture, National Sports Agency, local administrations' budgets).

Provision of benefits within the Card's scheme

The introduction of the Card extended the provision of benefits also to foreigners with disabilities holding the Card.

Moreover, in some countries, while the provision of benefits prior to the introduction of the Card was limited to specific targets among persons with disabilities, the introduction of the Card extended these benefits to a larger group of beneficiaries, by including all persons with disabilities regardless of other individual characteristics (BE, CY and RO). Specifically, in BE the service providers involved in the Card often provided benefits to persons with disabilities based on other factors such as age and employment status. In CY, the National Disability Card targeted elderly persons with disabilities and those who received disability or invalidity pensions. In RO, whilst under the national legislation only personal assistants of persons with severe or accentuated disabilities benefitted from free services, the introduction of the Card enlarged this benefit to the caregivers of persons with all degrees of disabilities.

Public support schemes did not vary after the introduction of the Card. In countries where no public support schemes were in place, no new subsidy was introduced (BE and FI). In turn, in countries where transport service providers already received financial support, this was extended to cover the costs of the Card (CY, MT, SI).

Participation of service providers in the Card's scheme

In all Member States in scope, the DCNO was the authority responsible for recruiting and managing service providers.

The participation of service providers is voluntary in BE, CY, FI, MT and SI, where the DCNO established individual contacts with service providers to be involved. In RO, where service providers covered by the Card are all state-owned, the scheme is legally binding. Hence, service providers are automatically recruited into the Card's scheme through official requests by the DCNO addressed to the Ministries competent for the sectors in scope.

In all concerned Member States, no particular selection or sampling strategy was applied to the **identification of service providers**. In BE and CY, the DCNO cooperated with the competent Ministries in the areas covered by the Card. In FI, a role in prompting service providers into the scheme was also played by persons with disabilities themselves. Notably, there have been cases of persons with disabilities who informed service providers not participating in the scheme about the Card, raising awareness of the initiative. Clearly, persons with disabilities have an interest in having a large number of service providers participating in the scheme. This led them to engage in a bottom-up recruiting process. Finally, in MT, the process entailed consultation with civil society organisations concerned with disability at the national level.

Participation of service providers was generally formalised through informal agreements. Only in RO were formal protocols signed between the DCNO and the competent Ministries in the sectors in scope as well as local administrations. At the end of the recruiting process, service providers **notify their participation** by filling in an online form on the national Card's website in BE, FI and MT, whilst no specific mechanisms were envisioned in RO and SI.

Managing contacts with service providers

In all Member States except for RO, the DCNO directly managed contacts with service providers participating in the Card's scheme in all sectors in scope. Communication mechanisms were the same across all sectors and were run through individual contacts in CY, FI, MT and RO³⁸². In BE and SI, there were no systematic communication mechanisms in place.

Main communication tools used include³⁸³

- Keeping contacts after the service provider enters the scheme: e-mails and phone calls (BE, CY, FI, MT), letters (CY, FI), meetings (MT, CY)³⁸⁴;
- Checking compliance of service providers (whether services/benefits are properly offered): e-mails and letters (BE, CY), phone calls and meetings, not defined (FI and MT), upon receipt of complaints and then forwarded to the Ministry/authority overseeing the service provider where the problem occurred (RO);
- Receiving/managing the notification not to participate anymore: e-mails (BE, CY, MT) and letters (CY), phone calls (CY), meetings (CY, MT)³⁸⁵;
- Finally, the frequency of contacts varies across countries: in FI, the DCNO calls twice a year to check on the Card's usefulness among service providers, whereas consultation occurs on an *ad hoc* basis in BE, CY and MT³⁸⁶. In RO, communications with the service providers are mediated by the DCNO and transmitted to the Ministries competent in the sectors in scope.

12.3.3. Conclusions and areas for improvement

The analysis of the recruitment and management of service providers within the national Card's schemes identified two key mechanisms that might positively contribute towards the success of the Card:

- **Multiplier effect:** the Finnish case shows that the identification and involvement of a well-known service provider with a nationwide scope may act as a lever to encourage other service providers to participate in the system. In fact, the recruitment strategy of the Finnish DCNO was aimed at involving large companies with a nationwide reach from the project's inception. This led to the involvement of the national railway company in the Card's scheme from the very beginning of the project. According to the DCNO, given the relevance and the standing of this service provider, its participation played a key role in convincing other service providers to join the scheme. Several important lessons may be drawn from this experience. First of all, involving a large service provider could allow leveraging its networking potential in deploying a far-reaching recruitment strategy. In fact, the DCNO might exploit the network and communication capacities of a leading service provider in order to accelerate information-sharing and to trigger a "snowball effect" in the recruitment of service providers with the participation of larger service providers prompting the others to join the system. Secondly, thanks to its sectoral expertise, a key service provider might help reinforce the DCNO's capacity to identify and

³⁸² Source: survey with the DCNO.

³⁸³ For BE and SI, this information is not available as it seems that no communication mechanisms were in place.

³⁸⁴ This is not applicable to RO as all service providers involved in the Card's scheme were state-owned.

³⁸⁵ Ibid.

³⁸⁶ No information is available for SI.

reach other service providers in the sector. This strategy might also facilitate negotiations with service providers to be recruited, encouraging them to join by captivating them through a well-known brand. Third, this process might also support the DCNO in raising awareness of the Card among both service providers and persons with disabilities. This process may also prove to be cost-effective. On the one hand, it may indeed allow significant savings for the DCNO in terms of human resources allocated and financial resources invested in advertising the Card. In fact, the DCNO may either partially rely on the advertising capacity of the leading service provider or make its communication strategy more effective by tailoring it to the audience. On the other hand, this process might increase the overall benefits by contributing to reaching a wider audience of service providers and persons with disabilities. In the end, the multiplier effect, as observed in FI, can contribute to increasing the efficiency and effectiveness of Card implementation, hence it is worth considering in other Member States willing to approach the Card.

- **Accessible information:** since the issuing of the Card requires the creation of a national Card's website with clear information on the package of benefits included, the Card system could play a role in improving the internet accessibility of those service providers lacking an accessible website or not having a website at all. For instance, in SI, most service providers do not have a website and, even when a website is available, in most cases it is not accessible. As a consequence, even though the service provider offers some specific benefits to persons with disabilities, it is difficult for the beneficiaries to retrieve information about these benefits. Thus, there is the risk of a "vicious circle": the service provider offers benefits but does not advertise/communicate about them; the potential beneficiary of the benefits does not know about them; thus s/he does not use the benefits; as a consequence, the service provider is not incentivised to offer the benefits anymore. The development of the national Card's website provided a centralised, accessible and comprehensive overview of all services and benefits offered throughout the country: persons with disabilities know where such information is available and can access it. The Slovenian case shows that, as long as the national Card's website provides clear information on the service providers involved in the scheme and on the benefits provided, this improves the visibility of service providers and also establishes direct communication channels between the service providers and the persons with disabilities. Consequently, the provision of accessible information on the services and benefits for persons with disabilities might magnify the Card's positive impact toward the better inclusion of persons with disabilities.

Recruitment and management mechanisms are key aspects in the overall performance of the Card system. Within the scope of this case study, two main areas for improvement can be identified. Notably:

- **Accessibility:** the enjoyment of benefits by persons with disabilities is, in most cases, conditional on physical accessibility. This is particularly true in the transport sector, for which several stakeholders from different countries identified an issue of accessibility. Hence, the involvement of a large number of service providers in the Card's scheme may yield no added value if this does not go hand in hand with the enhancement of the services' physical accessibility. Interestingly, the Maltese DCNO considered whether companies should have become physically accessible before joining the scheme. In this regard, the DCNO considered whether or not to approach entities that were not physically accessible for persons with disabilities. The DCNO decided to approach them in any case, as it considered that excluding these providers would have meant limiting the possibilities for certain persons with disabilities (e.g. for those with intellectual disabilities who do not need any particular improvement in physical accessibility). The Maltese DCNO, moreover, considered whether to oblige service providers to become physically accessible before joining the scheme. Yet, this was finally deemed as not being appropriate, as service

providers may not have had the necessary capabilities to do so. This experience highlights that the issue of physical accessibility must not be disregarded within the Card's scheme, suggesting that a suitable system of incentives and/or financial support should be deployed to ensure that all benefits provided under the Card's scheme are truly accessible for the cardholders.

- **Systematic communication:** in most countries in scope, it was found that no regular communication channels were established to manage contacts with service providers. In fact, a plethora of communication channels were leveraged, including e-mails, phone calls, surveys, events, etc. In addition, communication mostly occurred on an *ad hoc* basis without any fixed communication timelines. In this context, the lack of a clear and comprehensive strategy to manage contacts with service providers might arguably risk translating into duplication of efforts and ineffective communications. Therefore, it would be recommended that the DCNO establish regular and fixed communication channels with the service providers. This might support the DCNO not only in checking on whether the services/benefits are properly offered, but also can be useful in improving the Card system. In fact, service providers can have direct contacts with the Cardholders who take advantage of their benefits, either face-to-face or through customer services in case of larger providers. Thus, service providers may potentially constitute an effective transmission mechanism for detecting and monitoring the needs and level of satisfaction of persons with disabilities. In the end, this might increase the accountability of the service providers and the overall relevance of the services offered.

Finally, concerning the Card's impact on mobility, there is no statistical evidence that allows making any conclusions on the impact of the Card on the mobility of persons with disabilities, both within and across Member States. Nonetheless, positive feedback was shared by the DCNOs on the potential contribution of the involvement of a large number of service providers towards the enhanced mobility of persons with disabilities. However, this positive effect is likely to remain limited unless the geographical scope of the Card is extended with additional Member States entering the scheme.

12.4. Bottom-up stakeholder consultation

12.4.1. Context

The Department for Social Inclusion of Persons with Disabilities

In CY, the Department for Social Inclusion of Persons with Disabilities (DSID)³⁸⁷ was founded in 2009, following the Decision n. 66.763 of the Council of Ministers, as a new Department of the Ministry and Social Insurance.

The Department's mission is "to promote social protection, social inclusion, and employment of persons with disabilities". Its vision aims at the "improvement of the quality of life of persons with disabilities, through the formulation and implementation of such reforms, that will create new prospects for social inclusion".

The Department is organised into four sections tasked with: a) management of the system for the assessment of disability and functioning; b) provision of social benefits to persons with disabilities; c) provision of direct and indirect vocational training and other support services and d) coordination of the effective implementation of the UN CRPD and the National Disability Action Plan.

The legislative framework

In CY, the last two decades have witnessed the establishment of a legal framework that is aimed at protecting and promoting the rights of persons with disabilities. These laws consist of three ratification laws of International Conventions, five general laws, and 30 specific laws and regulations.

More specifically, the main laws include the Ratification as from 4.3.2011 of the UN CRPD, the General Law for Persons with Disabilities³⁸⁸ providing for the protection and promotion of the rights of persons with disabilities, and specialised Laws regarding education, employment, and financial assistance. The General Law for Persons with Disabilities explicitly states that "Every person with disabilities has the right to an independent living, full inclusion in society and equal participation in the financial and social life of the country." This legislative framework is nonetheless under scrutiny for further improvement. A new system for the assessment of disability and functioning based on the International Classification of Functioning, Disability and Health (ICF) of the WHO has been established, while also setting up more centres for this assessment.

In CY, the consultation with organisations representing persons with disabilities is legally regulated, since a specific Cypriot law makes it mandatory for every public service to consult with the CCOD before making any decisions on any matter – directly or indirectly – concerning persons with disabilities. The CCOD should indicate one or more representative in each case. The law states that CCOD receives an annual grant from the State Budget, taking into account the CCOD's role in making recommendations in legislative matters.

With regards to vocational training and employment, a new law was approved in December 2009 for the recruitment of persons with disabilities in the wider public sector with a quota of 10% of vacant posts. This law also covers financial incentives linked to the recruitment of persons with disabilities in the private sector. A programme for supported employment

³⁸⁷ See at: http://www.mlsi.gov.cy/mlsi/dsid/dsid.nsf/index_en/index_en?OpenDocument.

³⁸⁸ Persons with Disabilities Law (L. 127(I)/2000) available in English at: https://www.ilo.org/dyn/natlex/natlex4.detail?p_isn=57914&p_lang=en.

was initiated and sheltered workshops were set up. The need for new and modern training and employment programmes was recognised.

Concerning independent or supported living, an adequate standard of living is to be ensured by public financial assistance, as well as the receipt of monthly disability allowances and benefits, the provision of technical aids and equipment. NGOs and local authorities receive financial support for operating day care centres and homes in the community.

Regulations are also in place for accessibility in public buildings, public roads, public transport, and parking for persons with disabilities.

The administrative capacity to manage and promote actions that ensure the rights of persons with disabilities has been strengthened significantly, after the establishment of the coordination point for the implementation of the UN CRPD within the DSID. As a result, the first National Disability Action Plan 2013–2015 was developed as a tool to enforce CRPD implementation.

In the Initial CRPD report of the State party of 2013, it is reported that the attitudes towards persons with disabilities have improved among Cypriot citizens, nonetheless there remains room for further improvement. Various gaps have been detected regarding the implementation of the disability rights laws that more focused planning and improved cooperation in the public services could address. The report also highlighted that significant environmental and physical barriers still exist mainly for persons with motor and visual disabilities, due to inadequate implementation of laws by local authorities, but also because of ignorance and lack of respect within the population. Furthermore, direct monitoring coupled with penalties in case of violation of the laws could foster their implementation.

However, according to the Pancyprian Alliance for Disability³⁸⁹, “The National legislation of CY is not compatible with a human rights-based approach to disability, as it was supposed to be after the adoption and ratification by the Cyprus Government of the UNCRPD and the International Covenant on Civil and Political Rights”. Furthermore, the Alliance states that “the national legislation of CY such as the Equal Treatment in Employment and Occupation Law (L. 58(I)/2004)³⁹⁰, the Combating of Racism and Other Discrimination (Commissioner) Law (L. 42(I)/2004)³⁹¹ and the Persons with Disabilities Law (L. 127(I)/2000), does not provide sufficient legal protection to persons with disabilities, because it does not recognise the refusal of reasonable accommodation as disability-based discrimination.” Additionally, the Alliance maintains that multiple and intersectoral discrimination is not yet addressed by national legislation, and that currently equal recognition before the law is not guaranteed for persons with intellectual, psychosocial and other disabilities.

The Cyprus Confederation of Organisations of Persons with Disabilities and its member Organisations

The Cyprus Confederation of Organisations of Persons with Disabilities (CCOD)³⁹² was founded in 1984 and has been active ever since. Today CCOD is the Social Partner in all the matters that are directly or indirectly related to persons with disabilities and aims to promote measures to enable their full participation in the social, economic, political and cultural life of CY. The Confederation aims to create a European Disability Policy

³⁸⁹ Submission of the Pancyprian Alliance for Disability on List of Issues Prior to Reporting (LOIPR) for Cyprus' reporting cycle on the implementation of the International Covenant on Civil and Political Rights, accessible at: https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/CYP/INT_CCPR_ICS_CYP_34919_E.pdf.

³⁹⁰ Equal Treatment in Employment and Occupation Law (L. 58(I)/2004) available in Greek at: http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&isn=84138&p_country=CYP&p_count=451.

³⁹¹ Combating of Racism and Other Discrimination (Commissioner) Law (L. 42(I)/2004) available in Greek at: http://www.cylaw.org/nomoi/enop/non-ind/2004_1_42/full.html.

³⁹² See at: <http://www.kysoa.org.cy/kysoa/page.php?pageID=3&mpath=/1>.

Framework, focused on equal opportunities and the fight against discrimination, and is a member of the EDF. Even though it changed its name and amended its Statute in 1999, its goals remain the same: to fight for legislation and policies that can improve the participation of people with disabilities in the social, economic, political and cultural life of the country. Initially the main goal was to safeguard and promote the rights of persons with disabilities. Now CCOD includes the traditional Organisations of people with disabilities and also accepts organisations representing people with disabilities who cannot represent themselves (e.g. those with serious mental health problems or under aged persons).

Current member organisations include the following:

- Pancyprian Organisation for Rehabilitation of Disabled Persons (POAA), mainly people with disabled upper and lower limbs
- the Pancyprian Organisation of the Blind (POT)
- the Cyprus League Against Rheumatism (ASK)
- the Pancyprian Association of Parents of Persons with Intellectual Disabilities (PASYGOANA),
- the Pancyprian Multiple Sclerosis Association
- the Cyprus Myopathic Association
- the Cyprus Federation of the Deaf
- KEAA Students and Alumni Organisation (OMAKEAA)
- the Group ELPIDOFOROS

Specifically, the purposes of the Confederation include research and development on the causes of disabilities, on the quality of life, and health access; activities for the education, rehabilitation, and well-being of the persons with disabilities; promotion of prevention and treatment measures for any disability; coordination of activities for the education, rehabilitation and well-being of the persons with disabilities; cooperation between its member organisations; helping its member Organisations to submit requests to the Cyprus government and international bodies; and promotion of sports among persons with disabilities. The values that drive every action by the Confederation are self-representation of persons with disabilities, participation in the decision-making process as illustrated by the motto "nothing to do with people with disabilities without people with disabilities"; solidarity with charity and towards persons with disabilities in general, cooperation with the Social Partners and with Civil Society Organisations, in the belief that the social inclusion of persons with disabilities cannot be completed without access to the environment and everyday services and goods.

At the national level, the Confederation seeks to establish a national political framework for disability, emphasising the socio-political dimension. The main idea is that disability should not be seen as an individual issue, but as a societal and collective concern. The limitations faced by persons with disabilities are also due to society's inability to perceive their needs and wishes.

At the European level, the Confederation affirms the need for active participation in a truly representative European Disability Organisation such as the EDF.

An organisation can be registered as a member of the Confederation upon its request, which must be approved by a relevant decision of the Central Board of Directors, except for the honorary members of the Confederation. The Governing Bodies of the Confederation are the General Assembly of the members of the Confederation, the Central Council and the Executive Committee. The regular meetings of the Central Board of Directors are organised

by the President at least every two months. Extraordinary sessions are convened by the President or upon written request of at least one third of the Board members. The General Meetings of the Confederation are organised by the Chairman of the Central Board of Directors or upon a request made to him by a minimum of one third of the organisation's members, at least every three years to decide on matters of general policy of the Confederation.

12.4.2. The Card System

The governance scheme

The Cypriot DCNO, the DSIPD, is responsible for issuing the Card, recruiting and contacting the service providers, as well as updating the database with information on them. This was indeed the first step the DCNO undertook when planning the Card pilot. The DCNO was also in charge of contacting persons with disabilities and CSOs and consulting with them to define the Card benefits through focus groups, meetings, and online surveys. The creation of the Card national website was outsourced, whereas its updating is performed by the DCNO any time some benefits are added. The DCNO is also the body responsible for assessing the eligibility criteria, according to the new disability assessment based on the ICF system. The eligible persons database was established, uploaded with information and constantly updated by the DCNO. The production of the Card was performed in-house by the DCNO, using a special printer with Braille options.

The complaints and satisfaction surveys are also handled by the DCNO. The concentration of main relevant tasks in the hands of the DCNO makes the Cypriot scheme a very centralised one.

The consultation process

Fourteen consultation meetings were held by the DSIPD, with the participation of two organisations representing disabled persons. These meetings involved:

- 1) The Cyprus Confederation of Organisations of the Disabled (CCOD);
- 2) The Cyprus Paraplegic Organisation;
- 3) Thirteen potential service providers;
- 4) The Ministry of Transport, Communications and Works;
- 5) The Cultural Services of the Ministry of Education and Culture;
- 6) The Department of Antiquities;
- 7) The Cyprus Theatre Organisation;
- 8) The Cyprus Tourism Organisation;
- 9) The Cyprus Sports Organisation;
- 10) The Cyprus Football Association;
- 11) The Union of Cyprus Municipalities;
- 12) The Union of Cyprus Communities;

- 13) The Cyprus Telecommunication Authority;
- 14) The Cyprus Hotels Association;
- 15) The Association of Cyprus Tourist Enterprises;
- 16) The Association of Cyprus Travel Agents.

The first meetings in June 2013 took place only with potential service providers in order to develop a draft of the list of benefits. A month later, the CCOD was informed about the project with a letter from the DCNO, inviting them for a meeting together with service providers. Upon this, the CCOD requested a separate meeting to inform the DCNO that they had never agreed to the introduction of the Card in CY.

Prior to each meeting with the DCNO and/or any of the service providers, a letter was sent out to all members of the CCOD Board, asking them to participate. Up to five CCOD representatives participated in each meeting. All the members of the CCOD who took part in the meetings agreed on the same positions. Indeed, the CCOD discussed the Card internally in 15 meetings of their Central Board which took place during the period from September 2013 through September 2014. All decisions regarding the Card project were made unanimously. The main position of the CCOD was that they were not willing to just ratify the State's predetermined decisions concerning actions and policy plans for persons with disabilities which were taken without prior consultation and in the absence of the CCOD.

The first meeting's purpose was to discuss and exchange views and information on the benefits that might be able to be provided to the Cardholders, as well as the eligibility criteria.

After this initial meeting, two further meetings only with the CCOD followed. The topics of the meetings were the eligibility criteria as well as the benefits that might be able to be provided to the Cardholders. It was decided to conduct a series of meetings with the service providers (different participants) in order to discuss the benefits according to the sector (transport, culture, tourism, sport, etc.). These meetings were held during September 2014. At the end of such meetings, several points of agreement were reached (i.e. the list of benefits, eligibility criteria).

The CCOD expressed its dissatisfaction about the submission of the proposal to the EU for co-financing of the Card programme. However, according to the DCNO, the dissatisfaction of the CCOD was based on some general disagreements, without suggesting any valid alternative options. Therefore, the DCNO perceived no added value brought by the consultation in terms of useful insights on the ground to fulfil all the tasks entailed by the development of the national Card's scheme.

The DCNO underlined that it is important to note that these consultations with CCOD were far from being intended as negotiations and not every issue had to be agreed upon by the end of the process. In fact, the development of the Card's scheme in CY was almost completely in the hands of the DCNO. Apart from the consultations with CCOD and service providers, the DCNO solely took on the planning, the implementation, and the evaluation of the initiative.

The DCNO believes that the various meetings with the CCOD helped in the implementation of the project in general. The CCOD's participation in the meetings held with the service providers may have exerted some pressure on them to provide more benefits for both persons with disabilities and their assistants, when necessary.

Also, the negative attitude of the CCOD toward the Card project was obvious to the DCNO from the beginning. In the view of the DCNO, this attitude hindered the timely implementation of the project by delaying the launch of the project.

The views, opinions and suggestions from organisations representing persons with disabilities were taken into account in the project's development, according to the DCNO.

However, the CCOD is of another opinion. A specific episode is revealing:

“In a meeting where we wanted to talk with the Cyprus Football Association about the possibility of introducing facilities/reasonable accommodations for spectators, persons with visual disability, who would attend a football game, a representative of another organisation of persons with disabilities who was present intervened saying that this group of persons with disabilities does not need any reasonable accommodation. After his intervention, which was not commented on by the representatives of the Department (the DCNO) who were present at the meeting, any consultation with the Cyprus Football Association was stopped. The only reasonable accommodation offered at the football stations is for persons using a wheelchair and concerns the parking place and special seats in some stadiums of CY.”

Before introducing the Card in CY, the CCOD asked the DCNO to clarify with them several points concerning the assessment of persons who would be eligible, the procedures, the accessibility of services, and the inclusion of transport services in the project. Since none of the CCOD suggestions were taken into account in the project, a written agreement to the Card's scheme was never issued.

The only changes to the Card's scheme, with respect to what the DCNO had originally planned, were the introduction of more benefits after receiving complaints from CCOD and the extension of eligibility to persons with moderate disabilities rather than just severe and complete disabilities. This second change was still not considered to be enough by the CCOD, which believes that also mild disabilities should be included.

The CCOD still does not consider the project to have been successful in CY. This is due to the fact that it did not attract many applicants, despite the CCOD itself sending out invitations to all persons with disabilities in CY, and the small number of persons who did apply for the Card mostly did not use it.

From the side of CCOD, there were no new information exchanges with other CSOs from participating Member States, but only with other foreign CSOs already in their own network.

12.4.3. Conclusions and areas for improvement

Potential transferability

What occurred in CY is a constant reminder that the involvement of persons with disabilities from the very beginning is fundamental for the success of the implementation of a policy regarding them. More than the personal history between the CCOD and the DCNO, it seems that the issues they disagreed on are universal. The CCOD, indeed, bases its opinions on the UN CRPD principles and the aim to promote social inclusion of persons with disabilities.

Since CY is the only participating Member State that experienced this long negotiation process, one might think that it is only of interest to Cypriots. Nonetheless, there are specificities in the planning and implementation of the pilot in CY that should be avoided by any further implementing Member State.

First, the involvement of the DPOs occurred only in a second stage of consultations of the DCNO, after having first heard the opinions of the service providers. This made the CCOD feel like one among the many stakeholders, instead of the main one.

Secondly, the need for involving a broader list of service providers has been indicated by most Cardholders consulted in the online survey, with only 45% at least fairly satisfied with the coverage of the current benefits and services of the Card. The satisfaction was only around 30% for the transport and sport sectors.

Furthermore, the CCOD emphasised the importance of accessibility and the necessity for the service providers involved in the initiative to provide reasonable accommodation for disabled persons. This requirement was not enforced in CY, thus making the benefits

available but not necessarily utilisable, and thus undermining the vision of a wider cultural and sport participation of persons with disabilities.

Impact on social acceptance

The CCOD is not yet content with the Card implementation in CY. For example, no CCOD Board Member has applied for the Card and many CCOD members in their social networks have not either.

Since the CCOD themselves sent letters inviting all its members to apply for the Card, they did indeed make an effort to increase the spread of the Card. Being that CY is a small country, a high take-up rate was to be expected: yet the 20% rate that was reached is quite disappointing compared to the Maltese rate of 40% take-up.

Areas for improvement and suggestions

The first lesson to be learnt is that persons with disabilities and their organisations should be involved from the very start, when planning a policy deeply related to disability.

Another important lesson is that without accessibility of the websites, the buildings, and the offered service itself of the service providers, no discount alone will be able to convince Cardholders to visit a museum or attend a concert. Inclusion starts from having an accessible environment for everyone. Hence, accessibility should be taught to and enforced among service providers. Keeping in mind that comprehensive accessibility improvements will be costly and will take time to implement, some flexibility might be granted in the initial stage, but should not be further delayed.

Finally, the range of service providers must be such that persons with disabilities can fully participate in society, not only in a limited list of “allowed” locations. Hence the mandatory nature of participation for service providers (at least in the public sector) seems to be inevitable in making participation more likely.

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12.5. A case of administrative complexity - The prior notice obligation

12.5.1. Context

The governance scheme: overview of the management of the Card at the national level

According to the Law 448/2006, in RO a person is defined as having a disability if she/he cannot engage in regular daily activities due to a physical, mental or sensorial limitation, and thus requires protection measures to ensure her/his recovery, integration and social inclusion. There are four degrees of disability: light, medium, pronounced and severe. The degree of disability is evaluated by specialised committees, separate institutions for children and adults, responsible for issuing the certificate of disability. The certificate is either temporary or permanent, depending on the type and degree of disability. A person receiving a temporary certificate will need to go through a re-evaluation process once her/his certificate expires. Prior to the Card, the national certificate served a similar role at the national level, conferring benefits to persons with severe and pronounced disability across several sectors including the cultural, leisure, sport and transport sectors. The Card extended the benefits to persons with mild or medium levels of disabilities across all sectors except for transport. Importantly, the national legislation was not changed. The benefits offered through the Card are governed through individual protocols signed with county councils, local councils or ministries.

The DCNO (ANPDCA), which acts as a specialised body under the Ministry of Labour and Social Protection, is the central governing body of the Card, represented at the local level by the General Directorates for Social Assistance and Child Protection (DGASPC), public institutions under the governance of the county councils. The DGASPCs receive the applications for the Card (online or in person) and forward them on a monthly basis to the DCNO which evaluates them and forwards its decisions back to the local level. The DCNO then prints and personalises the Cards and sends them to the local authorities. In practice, several civil society organisations (e.g. The National Association for Deaf People, The National Association for the Blind etc.) could also receive applications, even though this information was not mentioned in the website or in the booklets (which are given to Cardholders together with the Card and include relevant information regarding how and where the Card can be used).

National experts (employees of the DCNO) recruited service providers, either individually (by phone, e-mail, in person) or collectively through the local councils or the Ministries to which they are subordinated. A total of 270 service providers were recruited since the inception of the programme. Public service providers have the benefit of being reimbursed by their local councils for the discounted or free tickets issued to EU Disability Card users. Private service providers do not have the same benefits. According to the DCNO, the refusal of some service providers to join the programme was due to the fact the benefits were extended to persons with mild or medium degrees of disability and due to the fact that many service providers lack accessibility that would be too costly to guarantee. Those accepting to participate in the Card's scheme may do so in part for social responsibility motives and to gain a more positive image at local and national levels.

The national Card's website was established by the DCNO. The development of the website was outsourced to a private provider that offered technical support whenever requested. The website structure was chosen by the project manager and his assistant. The person responsible for managing and updating the website was mainly the project manager.

Website structure, innovative features and potential issues

First, a description of the website is necessary in order to better understand the potential underlying issues, without discounting its innovative aspects with high transferability potential³⁹³. The website is structured into eight different sections: home page, project information, national events, international events, national benefits, international benefits, FAQ, and contact section.

The home page has an appealing design. The objective of the pilot action is stated as a header followed by a picture of the Card that, when clicked, redirects the visitor to an informational video presentation with an embedded sign language translation. The page states the necessary documents for the application with a request form attached, how the application can be submitted (online and in person) in each county, the benefits provided, the list of participating countries (which includes EE and IT), and the list of the most recent national and international events. Overall, the home page appears to be very well structured and, in addition, it supports a wide range of features to make it accessible for persons with disabilities.

In contrast, the information presented in the events and benefits sections is misleading, confusing and at times incorrect. Firstly, the national benefits page, which was intended as a means to promote specific events and increase the attractiveness of the Card, has only 19 entries out of which only some are indeed specific events of service providers offering benefits to EU Disability Cardholders. More often, the entries are simply descriptions of some service providers and do not advertise any specific event. Each of the entries on the service providers includes an ending date, which in most cases is at the end of 2018. This may signal to users that in 2019 they are no longer able to access those services.

In addition, one of the entries specifies that only persons with severe or pronounced disabilities can benefit from free entrance. Since in Romania the EU Disability Card extended the benefits provided by the national system also to persons with mild disabilities, it would signal that some of the service providers may discriminate against some categories of EU Disability Card users. Since the EU Disability Card does not specify the degree of disability, the user may infer from this information that the national certificate is still the main instrument to be used to access the offered benefits, at least at the national level.

The international benefits page has only nine entries, out of which eight are international service providers (from BE, CY, EE, MT, SI) and only one entry is an actual event (musical festival in CY). Cardholders may be confused by (i) the very small numbers of service providers and events, (ii) the fact that some of the participating Member States do not have any events listed (FI, IT), and (iii) the very short duration of the benefits (lasting in general for less than 6 months, the latest ending in January 2019). In addition, some of the entries list service providers in EE which, to date, has not yet implemented the programme.

The national benefits' page lists the service providers available; classified by the national authorities they fall under or by county. For the service providers listed by county, there is no information on the types of benefits Cardholders can expect; and thus, this does not help in reducing the uncertainty regarding the services to which Cardholders are entitled. A strikingly negative feature of this page is that for the capital, Bucharest, and its county Ilfov - in the county classification - there are no service providers listed, with blank cells for both.

Finally, the most inaccurate and confusing page is the one on international benefits. The only two Member States listed as providing benefits are CY and IT. For CY the benefits listed are priority seats and a 50% discount on buses for the EU Disability Cardholder and the assistant. For IT, the webpage informs that the EU Disability Card entails benefits on

³⁹³ Advertising specific effects national and international events could be a viable strategy to attract the interest of persons with disability to apply for the Card.

public transportation, access to the main museums and archaeological sites, sport facilities, theatres and concert halls. There are several issues with this page. First, the information is incomplete, and it excludes several Member States. Second, the shared information is incorrect, stating that IT, a country which has not yet implemented the project, provides benefits across all sectors.

As a consequence, eligible users may have decided to apply for the EU Disability Card to be used during travel to IT, a major tourist destination, expecting the listed benefits, only to be refused by service providers not even aware of the existence of the EU Disability Card.

Identified causes for the underlying issues

Each of the stated issues was investigated with both members of the DCNO and persons with disabilities.

Improper management

The low number of entries reflects an under allocation of human capital to effectively manage the project. The person mainly responsible for managing the website was the project manager with relatively little support from a personal assistant. Given that the project manager has a high position within the DCNO, with important functions and responsibilities, this allowed insufficient time or capacity for the management of the website, which was updated infrequently when time allowed. The website has not been updated in the past year, which explains why all the advertised events and the end date for several service providers date back to 2019. The specification that for some events and service providers the benefits are available only to persons with moderate or severe disabilities results from an error of information management and reflects the fact that the website is not regularly checked for the accuracy of the information provided. In hindsight, the DCNO team believes it would have been important to have a person employed full time with responsibility for the management of the website and other project specific tasks.

Lack of communication systems with service providers, lack of accessibility of services and lack of private providers

In RO, a system for communication between the DCNO and national service providers was not implemented. In practice, the national events were occasionally added to the website based on desk research by the project manager. The websites and social media accounts of the service providers were browsed individually in search of relevant events. This is clearly a highly inefficient process, which would require periodically browsing the digital communications channels of more than 200 entities. Contacting service providers directly may also be highly inefficient. Potential alternatives will be discussed in the concluding section.

One important issue pointed out by the DCNO is the lack of accessibility of services of both public and private providers, a longstanding problem in RO. By law (448/2006), service providers are obliged to reserve some places for persons with disabilities, but the law does not specify how many or what share of the total capacity. As a consequence, in practice, very few places are reserved for persons with disabilities, and even when they are reserved, often they prove to be highly inadequate. Due to these issues, the DCNO reported that it was particularly difficult to identify and advertise events which are able to guarantee sufficient and adequate places reserved for persons with disabilities.

Finally, an issue raised by both the DCNO and a Cardholder is the low number of private service providers participating in the national Card's scheme. The DCNO reported that their attempts to recruit a higher number of private service providers were unsuccessful mainly due to the fact that most service providers are unable to ensure accessibility requirements. For instance, the DCNO stated that even in the capital city, there are very few sports training facilities (gyms, swimming pools, etc.) that could accommodate a person in a wheelchair. The lack of service providers under the subordination of the local council in Bucharest was also due to the lack of cooperation and willingness from the local council to participate in the pilot action. The interviewed persons with disability also indicated that entities in Bucharest are particularly problematic and refused benefits to national certificate holders even before the EU Disability Card was introduced.

Lack of communication systems with other national authorities

Perhaps most importantly, this case study highlights one major area for improvement of the Card system at the EU level: the absence of a structured communication system between national authorities. This issue was strongly emphasised by the DCNO of RO, which was unaware of the different stages in the implementation process of the participating Member States, in particular the fact that in EE and IT the project was not yet implemented. Similar to the national events, the international events were added through desk research by browsing the national websites of the EU Disability Card and the individual websites and social media accounts of the international service providers. Even if the DCNO had tasked a person to perform this task on a full-time basis, this still would have been highly inefficient and could only be resolved with a proper communication system, ensuring a truly European dimension to the programme.

Regarding the international benefits page, the fact that benefits are listed only for CY and IT reflects the same issue. The DCNO reported that when the website was constructed, other information on international benefits could not be found in the websites of the participating Member States. The information regarding the benefits available in IT was initially provided by a Cardholder who travelled to and used the card in IT, information which was then checked by the DCNO through other sources and added to the website.

12.5.2. Impact on Card use at national level and cross-border mobility

Conveying confusing or even incorrect information may be even more damaging than not sharing such information. First, it may discourage users who would have applied for the Card even if less information were shared on the website. For instance, in the case of RO, the website appears to convey the information that the card is of little value abroad, which is clearly false. The interviews conducted with Cardholders and persons with disability who did not apply for the Card suggest that while the website may not discourage users from applying for the card, it appears to discourage the use of the Card to some extent. One Cardholder reported initially checking the website regularly in the hope that new events would be added and being profoundly disappointed that the Card appears to be of little use, both at national and international levels. One of the interviewed persons without a Card found out about the Card from a friend only recently, not having ever seen any advertisement or the website. The second respondent without a Card has seen the website and found the benefits to be sufficient but did not apply for the Card mainly due to a lack of need and trust as to whether the advertised benefits would actually be guaranteed by the service providers. This lack of trust was mentioned by three of the four persons interviewed.

It appears that both prior to the introduction of the EU Disability Card, when the national certificate was the only document entailing benefits, and after its implementation, in

practice, information about whether benefits are guaranteed or not and what benefits are offered is subject to the discretionary decision of the service providers' employees who decide, based on how visible the disability is, age and other factors, whether benefits are offered or not. This reflects a major problem, especially considering that the benefits offered to those with moderate and severe disabilities are guaranteed by law. The results of the second-round online survey emphasise this issue. About 60% of respondents in RO stated that there is low awareness among service providers of the rights of users when presenting the EU Disability Card.

Secondly, it may lead to cases of EU Disability Card users travelling abroad and being refused the benefits since service providers may not even be aware of the existence of the Card. This is of course the case of EE and IT, Member States that joined the programme but did not implement it to date. Through their Card's websites, all Member States inform users that the Card entails benefits in EE and IT. Potential users may encounter major difficulties in order to find out that currently the Card cannot be used in those countries. They would have to search for the national websites of EE (which does not exist) and IT (which has no sections on benefits) and based on the limited information infer that the card cannot actually be used in those countries. Or they would have to call the helpline of the Card to ask for more information. It is fairly easy to imagine how taking all these steps may reduce the desirability of having the Card or the use of the Card for travel abroad.

In practice, there were no reported complaints from EU Disability Card users being refused benefits abroad or from foreign EU Disability Card users being refused the benefits in RO. In contrast, the two interviewed Cardholders had very pleasant experiences travelling abroad. One respondent, who is the personal assistant of a Cardholder, reported being strongly motivated by the possession of the Card to travel abroad and reported having used the Card without experiencing any issues in several museums across the country and even travelling free of cost on busses and subways. Moreover, he also used the Card in countries that are not participating in the Card's scheme (e.g. in Italy) with both public and private service providers and also benefitted from free transportation on all means for both the Cardholder and the assistant. The second respondent successfully used the Card in several European countries which were not part of the project, where the Card was easily accepted, but encountered several obstacles when using the Card at the national level.

The fact that there were no official complaints does not rule out the possibility of negative experiences. Indeed, 60% of respondents to the online survey were not aware of the existence of any complaint mechanisms, even though this information is provided in the brochure that comes with the Card. While the DCNO is not aware of any complaints from users travelling to EE and IT and being refused benefits, given that many users did not know that they could issue complaints, we cannot exclude that some users may have had negative experiences. In addition, it appears that persons with disability in RO are accustomed to the fact that whether they are granted benefits or not is subject to the decision of individual service providers, even when benefits are regulated by law.

On a positive note, it must be highlighted that both interviewed Card users believe that the EU Disability Card is a great initiative, and that a high share of respondents in the second-round online survey would strongly recommend the Card to other persons with disabilities. Even though their experiences at the national level were very different, very positive for one respondent and negative for the other, both interviewed Card users were concerned that the Card is going to expire soon and believed that it is very important that the project continues and that other EU countries participate. Regarding cross-border mobility, both had positive experiences using the Card in countries where the project has not yet been implemented. As an official EU document, the Card appears to be readily accepted by service providers in several countries.

12.5.3. Conclusions and recommendations

Potential transferability

Despite the issues presented above, there are several features of the website which are innovative and could attract the interest of eligible participants. First, advertising national and international events could encourage the use and take-up of the Card. Persons with disabilities, besides having limitations of disability, face disadvantages in their access to education and, thus on average reach lower levels of educational attainment and have lower levels of participation in cultural and sports events. Given this characteristic, facilitating the user experience may be very important in convincing them that it is worth making the effort to apply for the Card. Secondly, allowing the users to show their interest and provide feedback for each event directly on the Card's website can provide useful information on the attractiveness and suitability of the selected benefits and service providers.

Since RO is the only country advertising specific national and international events directly in the EU Disability Card's website, there is a limit to what can be learned in terms of good practices from the other Member States. With regard to the recruitment process, in all Member States service providers were recruited using a similar strategy as in Romania. However, in BE, FI and SI service providers were offered the possibility to join the Card's scheme voluntarily, even if not contacted by the DCNO. The website of the Card includes a section dedicated to service providers, explaining how they can join the programme and why it would be beneficial for them. Service providers can then register directly in the website by filling out a form or sending an e-mail. Other than this aspect, the communication systems between service providers and the DCNOs are relatively similar across all Member States: phone calls, e-mails, online conferences and in person meetings.

None of the websites of the participating Member States includes a direct link to the websites of the other participating Member States. A potential user considering whether to apply would have to either go on the EU Disability Card's website of the European Commission to find the links to the national websites (the link of CY is missing) or try to find each website through internet browsing. This requires some proficiency in a foreign language or good internet browsing skills. These constraints may exclude the most vulnerable members of the target group from accessing or using the Card.

Areas for improvement and suggestions for future policy action

The present case study reveals that there is a need for more efficient communication systems at the national level (between the DCNOs and service providers) and at the international level (between the DCNOs of the participating Member States). The decentralised implementation strategy used in this pilot allowed Member States to manage several processes more efficiently (not having to redefine the legislation regarding disability, using pre-existing systems like the National Disability Card, etc.). However, it did not facilitate the establishment of communication systems between DCNOs, sharing of information and good practices, elements which are important for the success of a project aimed at encouraging mobility across Member States of a particularly vulnerable group. The fact that the RO DCNO was not aware that EE and IT did not implement the project, and that the websites of all Member States share the information that benefits can be enjoyed in EE and IT, highlights the need for better communication between Member States.

The initiative of RO to advertise also time limited national and international events may represent an effective way to encourage the take-up of the Card and mobility abroad, but for this to occur several aspects have to be improved. First of all, service providers should be allowed to opt in and advertise their services and events directly on the website. This

would allow service providers that had not directly been contacted by the DCNO to join the programme. In addition, service providers could be granted access to the platform, so they can upload the information regarding specific events on their own. This can bring visibility and send a positive signal to the population regarding their commitment to be an inclusive institution.

Secondly, each national website should include easy access to the websites of the other Member States. Card users should not have difficulties in finding out what services are available in the other countries, more so given the heterogeneity in the variety of services offered by each Member State. Ideally, this information should be available directly on the national websites; however, in practice this may be difficult to implement. One potential solution suggested by the RO DCNO is to have a monthly or even trimestral newsletter, where each DCNO can advertise specific events taking place in their country and publish updates on the developments of the project at the national level. An alternative, in addition to providing easy access to the websites of the other Member States, would be to develop websites with a similar structure to facilitate browsing, including accessibility features as in the websites of RO.

12.6. The replacement of the National Disability Card

12.6.1. Context

The Equal Opportunities (Persons with Disability) Act (EOA) came into effect in 2000 and is at the top of the hierarchy of laws relating to disability in Malta. The aim of this legislation was to *prohibit discrimination against persons with disabilities, give remedies when it is found that they occurred, and establish the then National Commission for Persons with Disability, now Commission for the Rights of Persons with Disability (CRPD), to see to its enforcement*. Through one of the subsequent amendments, it introduced the definition of “disability” which became defined as “a long-term physical, mental, intellectual or sensory impairment which in interaction with various barriers may hinder one’s full and effective participation in society on an equal basis with others”.

In 2014, the then Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing, in collaboration with the CRPD and the Kumitat Azzjoni Lejn Soċjetà Ġusta, published a national policy aimed at *promoting and safeguarding the rights of persons with disabilities in Malta and Gozo*. This policy, while rather comprehensive, fails to address specific aspects of persons with disabilities’ lives such as disability pensions and guardianship.

Drawing on the latter, the then Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing and the CRPD issued the Malta National Disability Strategy in 2015, a consultation document intended to “outline a national plan resulting in the improvement of the quality of life of persons with disabilities and their families”. To date, however, this document has not materialised into an actual strategy.

Other important pieces of legislation include: the Social Security Act, enacted in 1987 and amended several times since, concerning among other things *disability pensions and allowances*; the 2012 Mental Health Act, replacing the homonymous 1952 legislation, which regulates the provision of mental health services, care and rehabilitation and promotes the rights of people suffering from mental health disorders, also *establishing the Commissioner for the Promotion of Rights of Persons with Mental Disorders*; the 2016 Persons within the Autism Spectrum (Empowerment) Act aimed at empowering persons with autism; the Maltese Sign Language Recognition Act, issued in 2016, which *recognises Maltese Sign Language as an official language of Malta*, and sets up the Maltese Sign Language Council to see to the development, dissemination and promotion of the language; and the 2020-2030 Mental Health Strategy for Malta, aiming at “promoting mental health and well-being, preventing mental disorders among high-risk individuals and providing quality treatment and care to those with mental health problems”.

12.6.2. The EU Disability Card system

The governance scheme

For the sake of clarity, in this case study the expression Card is replaced by EU Card, to better distinguish between the EU Disability Card and the Maltese National Disability Card.

The CRPD was designated as the agency responsible for the EU Card management scheme because it required a high level of management capacity as well as the capacity to respect data protection standards. The CRPD already had a registry of persons with disabilities. Also, before the EU Card there was a national Special Identity Card (SID), which

was assigned to people with disabilities when they registered as such. Essentially, every person with disabilities, unless they have not yet certified their condition, has a SID.

As Malta introduced the use of the EU Card, the CRPD began processing the applications for the EU Card as well, and the database of national Cardholders was combined with that of the EU Cardholders. In administrative terms, production of the EU Card is managed by CRPD, but actual printing is carried out by a printer authorised by the Maltese government and capable of dealing with secure information. This company prints the cards and then sends them back to the CRPD, which distributes them.

The funding of the Card is managed by the CRPD, which receives government funding, including a yearly budget for the production of the EU Card.

The replacement mechanism

At the beginning of the EU Card implementation, the EU Card was intended for those people registered in the CRPD database, covering around 19,824 persons who already had the national SID. All the benefits included in the EU Card would correspond to those which were included in the national Card.

The Card is provided automatically after the expiration of the SID. However, if someone wants to apply for the Card prior to expiration of the SID, this can still be issued, but it will have the same number as the national Card in order to facilitate replacement.

As of 3 June 2020, the CRPD declared that the number of issued EU Cards amounted to 11,009. Of those, 3,500 reflect applications made in the period when the SID was still being distributed. In the six weeks after the SID programme ended and before the beginning of the EU Card initiative, an additional 636 persons actively applied for the EU Card. In the following two years, further 8,600 EU Cards were issued.

Regarding the recruitment of service providers, the service providers which were offering benefits under the national card system were contacted and asked if they had any objections to providing the same benefits to holders of the EU Card. If there were no objections, the benefits for national Cardholders would also apply to the EU Cardholders. The DCNO received no objections from any of the service providers in expanding those benefits to all EU Cardholders. This was facilitated by the belief that the community of persons with disabilities would complain in social media and to their political representatives if a benefit were cut from the offer, and this could ruin an individual service provider's reputation. Therefore, social pressure ensured that no benefits were eliminated.

Furthermore, attempts were made to include more service providers than the ones already involved with the SID by sending e-mails, making phone calls, and setting up meetings: the DCNO succeeded in recruiting all the service providers (30) listed in the Maltese EU Card's website.

When informing the previous and new service providers of the EU Card introduction, the DCNO also asked them for permission to include their contact details in the Maltese EU Card's website. Some service providers refused out of fear of financial loss, in case too much publicity generated an overwhelming inflow of Cardholders requesting benefits. The contact details of all service providers are available only in the DCNO website. Therefore, whereas Maltese residents know that these benefits are in place, tourists with disabilities might not be aware of all the benefits available.

Despite the fears of some service providers, other participating service providers reported that being listed in the EU Card's website was good publicity.

In the recruitment of service providers, the DCNO set accessibility as a condition for entering the programme. Physical accessibility was required, whereas accessibility of the website and the offer were advised. Some service providers already have made their website accessible, while others are working towards this goal. Good practices have been reported of service providers asking the DCNO's support to develop a tour specifically for the visually

impaired and further one for the deaf. Additionally, those service providers with reported episodes of discrimination against persons with disabilities were not invited to join the initiative.

The DCNO believes that already after the introduction of the SID cultural participation increased among persons with disabilities in MT. After the launch of the EU Card, persons with disabilities in MT were eager to know in which Countries this Card would be recognised. Allegedly, the EU Card has been recognised and used in Belgium on transports (not included in the BE Card benefits), while it apparently was recognised in the United Kingdom and in Australia, even though both Countries are outside of the pilot action.

12.6.3. Conclusions and recommendations

Potential transferability

Several EU-27 Member States already have some sort of Disability Card that might be used as a basis, so that the transition is smoother and acceptance higher.

However, if such a card was only related to medical assistance and not already associated with discounts in the culture, leisure, sport, or transport sector, the card could be perceived as a discriminatory object more than an instrument for improving social inclusion.

Nonetheless, in countries where databases of persons with disabilities already exist, their integration with information collected from applicants for the EU Card might save costs and favour a quick start of Card introduction. Furthermore, this wealth of information would enable the DCNO to investigate if specific categories are harder to reach and should be specifically invited to apply for the Card. Since in this study the team was not granted access to anonymised or aggregated versions of the databases of the eligible persons, due to unsurmountable data protection issues, the only option for assessing the existence of excluded categories would be for the DCNO itself to analyse this information. From the responses to the online survey it can be hypothesised that currently more educated persons and those who are still active in the workforce are more likely to apply for the Card.

Another important condition is that benefits already in place are maintained upon the replacement of the national Card by the EU Card, otherwise discontent would grow, and the EU Card would be perceived negatively.

Finally, another positive aspect of the Maltese case is that it was decided to let SID holders apply actively before their national Card expires, so that if they are planning a trip abroad, they can benefit from the mutual recognition of the EU Card among Member States. Any possible confusion was avoided with keeping the same serial number of the old Card in the EU Card.

Impact on social acceptance

The take-up rate in Malta has been beyond expectations: it was above 40% at the end of 2019 and is nearing 55% in June 2020.

The number of service providers might not seem substantial; however, it must be noted that some providers appear only once, but they represent multiple locations, such as Heritage Malta, which includes 18 archaeological sites, nine museums, and 11 underwater archaeological sites, and db Hotels, a hotel chain (brand) with multiple hotel facilities on the island. Additionally, the size of the population, around 470,000 inhabitants, is associated with generally small businesses, which are mostly afraid of possible financial consequences connected with the participation in the EU Card initiative. Notably, service providers do not fear of losing clients, rather they fear having too many visitors entering with discounts, also considering that accessibility of the environment is mandatory in MT. For what concerns the end users, four out of ten EU Cardholders in MT report the low number of service providers

involved as a problem of the EU Card, whereas in other Member States this rate is much higher, rising to 45% in RO, 55% in FI, 59% in BE, and 80% in CY. This finding corroborates the DCNO's opinion of good coverage in terms of benefits provided in MT.

The focus on the accessibility of services has certainly helped beneficiaries appreciate the programme more: in MT 70% of Cardholders responding in the second round of the online survey are satisfied at least to a fair extent with the benefits coverage, compared to 50% in FI and less than 50% in BE, CY, and RO.

Sustainability

Since the CRPD was in charge of the SID previously and is now responsible for the management of the EU Card, the implementation has been swift and smooth. The annual funding is still managed by the Ministry for the Family, Children's Rights and Social Solidarity as was done for the SID.

As the benefits of the EU Card entail access to EU-wide benefits, more persons should be applying for one. However, in MT persons with disabilities receive the SID when they register as having a disability. We therefore assume that most persons with disabilities in MT already have the SID. In other Member States where subscription is voluntary, demand for the EU Card might be higher and should be considered in advance.

Areas for improvement and suggestions

In the exercise of mapping the service providers, the Maltese EU Card's website led to some confusion, where only the newly registered service providers were listed, and others were not mentioned for "data protection issues". Despite the intention of the CRPD to protect the small businesses from potential financial losses and the assurance that even for these non-advertised services foreigners with the EU Card would be granted the same discounts as Malta residents, this non-transparency of information does not comply with the EU Card concept. Cardholders planning to visit Malta should be able to know in advance if they can benefit from a discount in a specific museum, instead of discovering it only at the ticket office. Persons with disabilities are known to be at risk of poverty and social exclusion, to be more often left out of the labour force. The need to be aware of discounts in advance is essential for most of them.

13. Stakeholder consultation

13.1. List of stakeholders involved

13.1.1. Interviews

Table 48 - Interviews performed with the DCNOs

Member State	Entity/ Organisation	Position	Interview performed on
BE	Federal Public Service (FPS) Social Security and Public Institutions of Social Security	Policy Officer	19 November 2019
CY	Department for Social Inclusion of Persons with Disabilities (DSIPD)	Director of the DSIPD	14 November 2019
EE	Estonian Social Insurance Board	Head of the Social Assistance Department	13 November 2019
FI	Service Foundation for People with an Intellectual Disability (KVPS)	Director of Disability Card Office in Finland	29 November 2019
IT	Italian Federation for Overcoming Handicap (FISH) Onlus	President of FISH Onlus	28 October 2019
MT	Commission for the Rights of Persons with Disability (CRPD)	Manager within the CRPD	22 November 2019
RO	National Authority for Persons with Disabilities (NAPD)	Head of the NAPD	12 December 2019
SI	Ministry of Labour, Family, Social Affairs and Equal Opportunities (MDDSZ)	Officer of the MDDSZ	6 December 2019

Table 49- Interviews performed with EU organisations³⁹⁴

Entity/ Organisation	Position	Interview performed on
European Network for Accessible Tourism (ENAT)	Vice President of ENAT	13 May 2020
Disabled Peoples' International (DPI) - Europe	Chairman	5 December 2019
European Disability Forum (EDF)	Policy Coordinator	26 November 2019

13.1.2. Survey

Table 50 – List of stakeholders involved in BE

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Musées royaux d'Art et d'Histoire	2
SP	Culture	Museum	Musée des Egouts	2
SP	Culture	Museum	Musée des Instruments de Musique - Muziekinstrumentenmuseum	2
SP	Culture	Museum	Musée Mode et Dentelle	2
SP	Culture	Museum	MiLL - Musée lanchelevici La Louvière	2
SP	Culture	Museum	Musée d'Art de la Province de Hainaut - BPS22	2
SP	Culture	Museum	Musée de la Forêt et des Eaux	2
SP	Culture	Museum	Musée de la Photographie	2
SP	Culture	Museum	Musée de la Vie wallonne	2

³⁹⁴ The European organisations were contacted for interviews, however only two of them participated. One of them refused and the other did not respond yet.

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Musée des Arts anciens du Namurois	2
SP	Culture	Museum	Musée des Transports en commun de Wallonie	2
SP	Culture	Museum	Musée du Marbre	2
SP	Culture	Museum	Musée du Pays d'Ourthe-Amblève	2
SP	Culture	Museum	Musée Félicien Rops	2
SP	Culture	Museum	Musée L - Musée universitaire de Louvain	2
SP	Culture	Museum	Musée royal de Mariemont	2
SP	Culture	Museum	AfricaMuseum	2
SP	Culture	Museum	Bakkerijmuseum Veurne	2
SP	Culture	Museum	Damiaanmuseum	2
SP	Culture	Museum	Design Museum Gent	2
SP	Culture	Museum	Gallo-Romeins Museum	2
SP	Culture	Museum	Hopmuseum Poperinge	2
SP	Culture	Museum	In Flanders Fields Museum	2
SP	Culture	Museum	Industriemuseum	2
SP	Culture	Museum	Jenevermuseum	2
SP	Culture	Museum	Käthe Kollwitz Museum - Fransmansmuseum	2
SP	Culture	Museum	KOERS. Museum van de Wielersport & Toerisme Roeselare	2
SP	Culture	Museum	M - Museum Leuven	2
SP	Culture	Museum	Modemuseum Hasselt	2
SP	Culture	Museum	MOU - Museum van Oudenaarde en de Vlaamse Ardennen	2
SP	Culture	Museum	Musea Brugge	1-2
SP	Culture	Museum	Brussels Museums	1-2
SP	Culture	Museum	Atomium vzw	1-2
SP	Culture	Museum	Bruges beer experience	1-2
SP	Culture	Museum	MAS	1-2
SP	Culture	Cultural Centre	Vlaamse Vereniging cultuurcentra	1-2
SP	Culture	Cultural Centre	Cultuurcentrum Achterolmen	2
SP	Culture	Cultural Centre	Cultuurcentrum Belgica	2
SP	Culture	Cultural Centre	Cultuurcentrum casino Houthalen	2
SP	Culture	Cultural Centre	Cultuurcentrum De Abdij	2
SP	Culture	Cultural Centre	Cultuurcentrum De Adelberg	2
SP	Culture	Cultural Centre	Cultuurcentrum de borre	2
SP	Culture	Cultural Centre	Cultuurcentrum Hasselt	2
SP	Culture	Cultural Centre	Cultuurcentrum Knokke-Heist	2
SP	Culture	Cultural Centre	Cultuurcentrum Palethe	2
SP	Culture	Cultural Centre	Cultuurcentrum Strombeek	2
SP	Culture	Cultural Centre	Gemeente Brasschaat - cultuurcentrum	2
SP	Culture	Cultural Centre	Cultureel Centrum Lanaken	2
SP	Culture	Cultural Centre	Cultuurhuis de Warande	2
SP	Culture	Cultural Centre	Cultuurpromotie vzw (OC de Djoelen)	2
SP	Culture	Performing Arts	Theater Malpertuis	2
SP	Culture	Performing Arts	Theater Tinnenpot	2
SP	Culture	Performing Arts	Kaaitheater	2

Role	Sector	Entity	Name	Round
SP	Sport	Sports Club	De Nekker	1-2
SP	Sport	Sports Club	Provinciaal Groendomein Hof van Leysen	1-2
SP	Sport	Sports Club	Cercle d'Escrime Damoclès	1-2
SP	Sport	Sports Club	Joso asbl	1-2
SP	Sport	Sports Club	Basketbalclub Filou Oostende	2
SP	Sport	Sports Club	Gitse Batmintonclub	2
SP	Sport	Sports Club	Good Shape Health and Fitness Center	2
SP	Sport	Sports Club	Judoclub Jenos Kwai	2
SP	Sport	Sports Club	Paracycling	2
SP	Sport	Sports Club	Sven Cycling Center	2
SP	Other	Accessibility company	Inter Agentschap Toegankelijk Vlaanderen	2
CSO	-	-	The Belgian Disability Forum (BDF) - including 17 Belgian organisations representative of persons with disabilities	1-2
CSO	-	-	NOOZO - Flemish advisory board for policy participation including all the organisations of persons with disabilities	1-2
CSO	-	-	Our New Future (Onze Nieuwe Toekomst VZW)	1-2
CSO	-	-	Inclusion ASBL	1-2
CSO	-	-	Commission Wallonne des Personnes Handicapées- Walonian commission for PWD who provides advice in matters of disability policy	1-2
CSO	-	-	G Sport Vlaanderen	1-2

Table 51 - List of stakeholders involved in CY

Role	Sector	Entity	Name	Round
SP	Culture	Festival	"Cypria" International Festival	1-2
SP	Culture	Museum	Cyprus Museum, Nicosia	1-2
SP	Culture	Museum	Limassol District Archaeological Museum	1-2
SP	Culture	Museum	Larnaca District Archaeological Museum	1-2
SP	Culture	Museum	Pafos District Archaeological Museum	1-2
SP	Culture	Museum	Ethnological Museum (House of Hadjigeorgakis Kornesios), Nicosia	1-2
SP	Culture	Museum	Local Archaeological Museum, Ancient City of Idalium	1-2
SP	Culture	Museum	Local Ethnological Museum of Traditional Embroidery and Silversmith-work, Lefkara	1-2
SP	Culture	Museum	Local Ethnological Museum, Fikardou	1-2
SP	Culture	Museum	Cyprus Medieval Museum (Limassol Castle)	1-2
SP	Culture	Museum	Local Kourion Archaeological Museum (Episkopi)	1-2
SP	Culture	Museum	Local Archaeological Museum – Palaipafos, Kouklia	1-2
SP	Culture	Museum	Folk Art Museum, Geroskipou	1-2
SP	Culture	Museum	Local Museum of Marion-Arsinoe, Polis Chrysochous	1-2
SP	Culture	Museum	Maa – Palaiokastros Museum	1-2
SP	Culture	Castle	Larnaca Castle	1-2

Role	Sector	Entity	Name	Round
SP	Culture	Castle	Pafos Castle	1-2
SP	Culture	Castle	Kolossi Castle	1-2
SP	Culture	Castle	Larnaca Castle	1-2
SP	Culture	Castle	Limassol Castle (Cyprus Medieval Museum)	1-2
SP	Culture	Heritage Site	Khirokitia	1
SP	Culture	Heritage Site	Palaipafos (Kouklia)	1
SP	Culture	Heritage Site	Nea Pafos	1
SP	Culture	Heritage Site	Tamassos	1
SP	Culture	Heritage Site	Kition	1
SP	Culture	Heritage Site	Khirokitia	1
SP	Culture	Heritage Site	Kalavassos -Tenta	1
SP	Culture	Heritage Site	Amathunta	1
SP	Culture	Heritage Site	Palepafos (Kouklia)	1
SP	Culture	Heritage Site	Nea Pafos	1
SP	Culture	Heritage Site	The Tombs of the Kings	1
SP	Culture	Heritage Site	Maa – Palaiokastros	1
SP	Culture	Heritage Site	Agios Georgios Pegeias	1
SP	Culture	Heritage Site	Kourion	1
SP	Culture	Heritage Site	Icons House of Saint Ioannis Lampadistis Holy Monastery	1
SP	Culture	Museum	Hambis Printmaking Museum	1-2
SP	Culture	Museum	Cyprus Motor Museum	1-2
SP	Culture	Museum	Cyprus Theatre Museum	1-2
SP	Culture	Museum	Cyprus Medical Museum	1-2
SP	Culture	Museum	Pierides Museum	1
SP	Culture	Museum	Kallinikeio Municipal Museum of Athienou	1-2
SP	Culture	Museum	Pafos Ethnological Museum	1-2
SP	Culture	Museum	Deryneia Municipal Museums	1-2
SP	Culture	Museum	State Gallery of Cypriot Contemporary Art	1-2
SP	Culture	Museum	A. G. Leventis Gallery	1
SP	Culture	Museum	THOC performances	1-2
SP	Transport	Public transport	Ministry of Transport, Communications and Works	1-2
SP	Sport	Sports Club	Cyprus Sports Organization (CSO)	1-2
CSO	-	-	The Cyprus Confederation of Disabled People Organisations	1-2
CSO	-	-	Cyprus Paraplegic Association	1-2
CSO	-	-	MAZI4Autism	1-2
CSO	-	-	Cyprus Autism Association	1-2
CSO	-	-	Agkalia Elpidas NGO	1-2
CSO	-	-	Cyprus Para Sports Federation	1-2

Role	Sector	Entity	Name	Round
CSO	-	-	Pancyprian Organisation of the Blind (POT)	1-2
CSO	-	-	Cyprus Confederation of Organisations of the Disabled (CCOD)	1-2

Table 52 - List of stakeholders involved in FI

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Ateneum Art Museum	1
SP	Culture	Museum	Finnish museum associations	1-2
SP	Culture	Museum	The Museum of Contemporary Art Kiasma	1-2
SP	Culture	Museum	Vapriikki Museum center	1-2
SP	Culture	Museum	Turku Castle	1-2
SP	Culture	Museum	Luostarinmäki Handicrafts museum	1-2
SP	Culture	Museum	Aboa Vetus Ars Nova – Museum of History and Contemporary Art in Turku	1-2
SP	Culture	Museum	Moominworld	1-2
SP	Culture	Museum	Arktikum Science Centrum, Museum	1-2
SP	Culture	Museum	Alvar Aalto -museo	2
SP	Culture	Museum	Apteekkimuseo ja Qwenselin talo	2
SP	Culture	Museum	Helsingin kaupunginmuseo	2
SP	Culture	Museum	Kauhavan puukko- ja tekstiilimuseo	2
SP	Culture	Museum	Kuopion korttelimuseo	2
SP	Culture	Museum	Kuopion museo	2
SP	Culture	Museum	Lapin Metsämuseo	2
SP	Culture	Museum	Luostarinmäen käsityöläismuseo	2
SP	Culture	Museum	Museokeskus Vapriikki	2
SP	Culture	Museum	Nykytaiteen museo Kiasma	2
SP	Culture	Museum	Paimio Sähkämuseo	2
SP	Culture	Museum	Porin taidemuseo	2
SP	Culture	Museum	Rauman merimuseo	2
SP	Culture	Museum	RIISA – Ortodoksinen kirkkomuseo	2
SP	Culture	Museum	Salon elektroniikkamuseo	2
SP	Culture	Museum	Salon Taidemuseo Veturitali	2

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Suomen Ilmailumuseo	2
SP	Culture	Museum	Suomen käsityön museo	2
SP	Leisure	Cinema	Finnkino Oy	1
SP	Leisure	Amusement park	Tampereen Särkänniemi Oy	1
SP	Leisure	Amusement park	Linnanmäki Amusement Park	1-2
SP	Leisure	Water park/Spa	Puuhamaa - Water- and Activity Park	1-2
SP	Leisure	Water park/Spa	Lake Saimaa Spa Holidays	1-2
SP	Leisure	Zoo	Korkeasaari Zoo	1-2
SP	Leisure	Festival	Solar Sound Festival	2
SP	Leisure	Festival	Kaustinen Folk Music Festival	2
SP	Leisure	Festival	Wanaja Festival	2
SP	Leisure	Festival	Iskelmä Festivaali	2
SP	Leisure	Performing Arts	Hämeenlinnan Teatteri	2
SP	Leisure	Performing Arts	IN-teatteri	2
SP	Leisure	Performing Arts	Jyväskylän Huoneteatteri	2
SP	Leisure	Performing Arts	Kemin kaupunginteatteri	2
SP	Leisure	Performing Arts	Koljonvirta teatteri	2
SP	Leisure	Performing Arts	Kouvolan Teatteri	2
SP	Leisure	Cinema	BioRex Porvoo	2
SP	Leisure	Cinema	BioRex Rovaniemi	2
SP	Sport	Swimming Pool	Impivaara swimming Centre	1-2
SP	Sport	Gym	Sports Halls	1-2
SP	Sport	Sports club	HJK Helsinki	1-2
SP	Sport	Sports club	Tappara, Tamhockey Oy	1-2
SP	Sport	Sports Club	Saimaa Stadiumi	2
SP	Sport	Sports Club	Liikuntaparkki Oy	2
SP	Sport	Swimming Pool	Lammin uimahalli	2

Role	Sector	Entity	Name	Round
SP	Sport	Swimming Pool	Kaarinan uimahalli	2
SP	Sport	Gym	Mänttä-Vilppulan kuntosalit	2
SP	Sport	Sports Club	Liikuntakeskus Uikko	2
SP	Public transport	Public transport	Public transport in the Hämeenlinna region	1-2
SP	Public transport	Public transport	VR group - Finnish railway company	1-2
SP	Public transport	Public transport	Porin Linjat – Public Transport	
SP	Public transport	Public transport	Taksi Tampere	1-2
SP	Public transport	Metro Area	Joensuun seudun joukkoliikenne	2
SP	Public transport	Metro Area	Tampereen seudun joukkoliikenne	2
SP	Public transport	Metro Area	VILKKU – Kuopion seudun joukkoliikenne	2
SP	Public transport	Public transport	Riihimäen paikallisliikenne	2
CSO	-	-	Finnish Disability Forum	1-2
CSO	-	-	Finnish Sports Association of Persons with Disabilities (Suomen Vammaisurheilu ja liikunta)	1-2
CSO	-	-	Finnish Association of People with Physical Disabilities (Invalidiliitto)	1-2
CSO	-	-	Association for disabled people (kehitysvammaisten tukiliitto)	1-2
CSO	-	-	Finnish Federation of the Visually Impaired (Näkövammaisten liitto)	1-2
CSO	-	-	Finnish deaf association (Kuurojen liitto)	1-2
CSO	-	-	The Threshold Association (Kynnys ry)	1-2
CSO	-	-	The Finnish Association on Intellectual and Developmental Disabilities (FAIDD)	1-2
CSO	-	-	KVPS Service Foundation for People with an Intellectual Disability	1-2
CSO	-	-	Inclusion Finland FDUV	1-2
CSO	-	-	The Finnish Activity Centre For Disabled Children and Their Families	1-2
CSO	-	-	Finnish Brain Association - Aivoliitto	1-2
CSO	-	-	The Finnish Federation of Hard of Hearing	1-2

Role	Sector	Entity	Name	Round
CSO	-	-	The Finnish Association of People with Physical Disabilities	1-2
CSO	-	-	The Uusimaa Regional Support Association for the Mentally Handicapped Persons (Kehitysvammaisten Uudenmaan Tukipiiri ry)	1-2
CSO	-	-	Finnish museum associations	1-2
CSO	-	-	Finland for All Accessible Tourism	1-2

Table 53 - List of stakeholders involved in MT

Role	Sector	Entity	Name	Round
SP	Culture	Heritage Site	Heritage Malta	1-2
SP	Culture	Heritage Site	Limestone Heritage	1-2
SP	Culture	Museum	Mdina Dungeons Museum	1-2
SP	Culture	Museum	The Knights Of Malta	1-2
SP	Culture	Audio-visual show	The Malta Experience	1
SP	Culture	Museum	The Mdina Experience	1-2
SP	Leisure	Bird Park	Bird Park Malta	1-2
SP	Leisure	Planetarium	Esplora	1
SP	Leisure	Nature Association	Malta Falconry Centre	1-2
SP	Leisure	Aquarium	Malta National Aquarium	1-2
SP	Leisure	Clothing	Dizz Group	1-2
SP	Leisure	Accommodation	db Hotels + Resorts	1-2
SP	Leisure	Festival	Klacc u Brejk	1-2
SP	Leisure	Electronics	Matrix (Airport)	1-2
SP	Leisure	Electronics	Matrix (Bay Street)	1-2
SP	Leisure	Electronics	Matrix (Paola)	1-2
SP	Leisure	Electronics	Matrix (Sliema)	1-2
SP	Leisure	Electronics	Matrix (Tigne Point)	1-2
SP	Leisure	Electronics	Matrix (Valletta)	1-2
SP	Leisure	Amusement park	Playmobil FunPark	1-2
SP	Leisure	Cinema	Tal-Lira Group	1-2
SP	Leisure	Clothing	Debenhams Malta (Paola)	1-2
SP	Leisure	Clothing	Debenhams Malta (Sliema)	1-2
SP	Leisure	Electronics	Forestals (Gozo)	1-2
SP	Leisure	Electronics	Forestals (Mriehel)	1-2
SP	Leisure	Electronics	Forestals (Valletta)	1-2
SP	Private Transport	Taxi service	hicabs	1-2
SP	Private Transport	Taxi service	M Cabs	1-2
CSO	-	-	Inspire foundation Malta	1-2
CSO	-	-	Malta Federation of Organisations Persons with Disability	1-2
CSO	-	-	Breakinglimits	1-2
CSO	-	-	evviva – Equal, Valid, Visible, Inclusive, Vocal, Accessible	1-2

Table 54 - List of stakeholders involved in RO

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Village Museum – Martisor Fair	1-2
SP	Culture/Leisure	Various	All the service providers associated with the Ministry of Culture (125 entities)	1-2
SP	Culture	Castle	Peles Castle	1-2
SP	Culture	Museum	Muzeul National de Istorie a Românei	1
SP	Culture	Museum	Brukenthal National Museum	1-2
SP	Culture	Museum	Complexul Muzeal de Stiinte ale Naturii Constanta	1-2
SP	Culture	Museum	Muzeul memorial B.P. Hașdeu, Câmpina	1-2
SP	Culture	Museum	Muzeul Satului Bănățean	1-2
SP	Leisure	Travel agency	Incoming Romania	1-2
SP	Leisure	Zoo	Gradina Zoologică, Baneasa	1-2
SP	Leisure	Travel agency	Exact Tours	1-2
SP	Leisure	Zoo	Gradina Zoologică, Oradea	1-2
SP	Sport	Federation	Federatia Romana de Fotbal	1
SP	Sport	Federation	Federația Română de Handbal	1-2
SP	Transport	Cablecar	Telegondola-Piatra Neamt	1-2
SP	Transport	Railway	CFR Marfa	1-2
SP	Transport	Cablecar	Telegondola Mamaia	1-2
CSO	-	-	Romanian National Association of Deaf	1-2
CSO	-	-	Romanian National Association of Blind	1-2
CSO	-	-	Alaturi de Voi Romania Foundation	1-2
CSO	-	-	World Vision Romania Foundation	1-2
CSO	-	-	SOS Children Villages Romania	1-2
CSO	-	-	Tandem Association	1-2
CSO	-	-	First Steps to Performance Association	1-2
CSO	-	-	Asociația Totul Pentru Tine	1-2
CSO	-	-	Asociația Ced România – Centrul De Excelență Prin Diversitate	1-2
CSO	-	-	Sano Touring	1-2

Table 55 - List of stakeholders involved in SI

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Zgodovinski arhiv Celje	1-2
SP	Culture	Museum	Narodna galerija	1-2
SP	Culture	Museum	Musej noverjse zgodovine Slovenije	1-2
SP	Culture	Museum	Narodni dom Maribor	1-2
SP	Culture	Museum	Umetnostna galerija Maribor	1-2
SP	Culture	Museum	MARIBOX	1-2
SP	Culture	Museum	Krško Gallery and Krško City Museum	1-2
SP	Culture	Museum	Bozidar Jakac Gallery	1-2

Role	Sector	Entity	Name	Round
SP	Culture	Museum	Kulturno središče evropskih vesoljskih tehnologij - KSEVT	1-2
SP	Culture	Museum	Muzej novejše zgodovine Celje	1-2
SP	Culture	Museum	Muzej Velenje	1-2
SP	Culture	Museum	Galerija Krško in Mestni muzej Krško	2
SP	Culture	Museum	Koroški pokrajinski muzej	2
SP	Culture	Museum	Loški muzej Škofja Loka	2
SP	Culture	Museum	Medobčinski muzej Kamnik	2
SP	Culture	Museum	Mestni muzej Idrija	2
SP	Culture	Museum	Mestni muzej Ljubljana	2
SP	Culture	Museum	Muzej na prostem Rogatec	2
SP	Culture	Museum	Muzej novejše zgodovine Celje	2
SP	Culture	Museum	Muzej pošte in telekomunikacij	2
SP	Culture	Museum	Muzej sodobne umetnosti Metelkova	2
SP	Culture	Museum	Muzej za arhitekturo in oblikovanje	2
SP	Culture	Library	Knjižnica Brežice	2
SP	Culture	Library	Knjižnica Dravograd	2
SP	Culture	Library	Knjižnica Franca Ksavra Meška Ormož	2
SP	Culture	Library	Knjižnica Medvode	2
SP	Culture	Library	Mariborska knjižnica	2
SP	Culture	Culture	Kulturni dom Nova Gorica	2
SP	Culture	Theatre	King Kong teater	2
SP	Leisure	Hotel	Hotel Cerčno d.o.o.	2
SP	Leisure	Park	Arboretum Volčji Potok	2
SP	Leisure	Cinema	Mestni kino Ptuj - Center interesnih dejavnosti Ptuj	2
SP	Leisure	Zoo	Ljubljana Zoo	1-2
SP	Leisure	Cinema	Slovenska Kinoteka	1-2
SP	Leisure	Tourism agency	Zavod za turizem Maribor – Pohorje TIC Maribor	1-2
SP	Leisure	Performing Arts	Gledališče Glej	1-2
SP	Leisure	Water park/Spa	Terme Dobrna dd	1-2
SP	Leisure	Festival	Festival Velenje	1-2
SP	Leisure	Performing Arts	SLG Celje	1-2
SP	Sport	Sport Club	Karate Klub Sokol	1-2
SP	Sport	Sport and wellness	Sunny Studio d.o.o.	1-2
SP	Sport	Sport Club	Javni zavod za sport Slov. Bistrica	1-2
SP	Sport	Sport Club	Zavod za kulturo, turizem in šport Vransko	1-2
SP	Sport	Sport	Balinarski klub LESCE	2
SP	Sport	Sport	Javni zavod za šport Nova Gorica	2
SP	Sport	Sport	RTC Žičnice Kranjska Gora d.d.	2
SP	Sport	Sport	Udobno po svetu	2
CSO	-	-	National Council of organisations	1-2
CSO	-	-	YHD - Association for Theory and Culture of Handicap	1-2
CSO	-	-	Slovenian Dystrophy Society (Društvo distrofikov Slovenije)	1-2

Role	Sector	Entity	Name	Round
CSO	-	-	Association of the Blind and Visually Impaired Slovenian Societies (Zveza društev slepih in slabovidnih slovenije)	1-2
CSO	-	-	Association for Sport of Disabled Persons of Slovenia – Paralympic Committee (Zveza za šport invalidov Slovenije – Paraolimpijskega komiteja)	1-2
CSO	-	-	Slovenska matica	1-2
CSO	-	-	Forum of Disabled Persons of Slovenia (Združenje invalidov Forum Slovenije)	1-2
CSO	-	-	Deaf and Hard of Hearing Clubs Association of Slovenia (Zveza Društev Gluhih in Naglušnih Slovenije)	1-2

14. Interview guidelines

14.1. European level

- Please, may you briefly describe the role and mission of your organisation and the extent to which you were involved with the EDC set-up and implementation?
- In your opinion, to what extent do the existing **differences in national legal and administrative systems** (e.g. different eligible criteria, different production and delivery mechanisms, etc.) represent an obstacle to the effective implementation of the EU Disability Card?
- In your opinion, to what extent is the **definition of disability** harmonised across Member States? What are the main differences and to what extent they represent an obstacle to the mobility of persons with disabilities across Europe?
- In your opinion, to what extent do current benefits/services covered by the EU Disability Card respond to the actual **needs of persons with disabilities** in the different areas (culture, leisure, sport, transport)? Which are the key needs not covered by current benefits/services, if any? In your opinion, to what extent were the service providers well selected to cover the needs of persons with disabilities?
- In your opinion, to what extent were **persons with disabilities consulted to define the package of benefits** to be covered with the EU Disability Card?
- Based on your experience, what are the main **problems related to the use of the EU Disability Card** (e.g. eligibility criteria, national packages of benefits, provision of benefits to the Assistant, type of service providers, low awareness of persons with disabilities)?
- Based on your experience, to what extent do you deem the available **complaint mechanisms** as appropriate to address the problems experienced with the use of the EU Disability Card?
- In your opinion, to what extent were the **awareness-raising activities** carried out at the national level able to promote the EU Disability Card among persons with

disabilities? Did your organisation perform any promotional activity to inform potential beneficiaries about the establishment of the EU Disability Card and its use?

- In your opinion, to what extent did the EU Disability Card contribute to increase:
- The mobility of persons with disabilities across Member States?
- The participation of persons with disabilities in cultural events?
- The participation of persons with disabilities in sport events?
- The number of service providers offering benefits to persons with disabilities
- The number of persons with disabilities accessing the services provided
- Do you perform any **monitoring activities** on the EU Disability Card system (e.g. periodical surveys, collection of statistics, etc.)?
- Could you share any example of a **good practice** related to the EU Disability Card?
- In your opinion, what are areas of improvement to consider in enlarging the use of the EU Disability Card across Europe?
- In your opinion, what areas of improvement could be implemented to increase cross-border mobility of persons with disabilities?
- In your opinion, to what extent did the EU Disability Card encourage providers to improve the **accessibility** of their building/vehicle/service (e.g. ramps, inclusive bathrooms, audio guides, etc.)?
- Are you aware of any cases of persons with disabilities from countries not participating to the EU Disability Card project who were refused any benefit/service due to lack EU Disability Cardholder status?
- In your opinion, did the establishment of the EU Disability Card system present an opportunity to increase **Member States' cooperation** in the area of disability?
- Would you like to be involved in **future consultations** for this study?

14.2. National level

- Please, could you briefly describe how the **DCNO** was established in your country and its key role?
- In your country, is the **definition of disability** set at the national or regional level? Based on the definition, what are the eligibility criteria needed to receive the EU Disability Card? Please, provide reference to key national legislation concerned with the EU Disability Card.
- According to our understanding, the EU Disability Card system at the national level entails at least the following roles, is this correct?
- **Issuing authority** – in charge of approving requests for the Card; s/he may also be responsible for the assessment of the applicant's eligibility/managing the application or delegating these functions. In your country, who is responsible for the Card issuing and how does it work?

- **Recruiting service providers** – in charge of attracting/selecting service providers to the system. In your country, who was responsible for recruiting service providers? May you briefly describe how the recruiting process worked (e.g. public tender, expression of interests, etc.)?
- **Managing contacts with service providers** – in charge of updating the list of services covered. In your country, who will be responsible for maintaining contacts with service providers? How and how often will service providers be contacted?
- **Production authority** – in charge of printing the Card. Production may be inhouse or subcontracted. In your country, who is responsible for the Card's production and how does it work? Could you provide indicative production costs per each card issued?
- **Delivery authority** – in charge of delivering the Card (at a dedicated office or via mail). Delivery may be inhouse/subcontracted and free/fee based? In your country, who is responsible for the Card's delivery and how does it work? Could you provide indicative production costs per each card issued?
- Please, could you kindly suggest any other **relevant authorities** we should consider in your country (e.g. national level, regional level, local level)?
- In your opinion, what are the main **reasons service providers participate/not** in the EU Disability Card system? Are there sectors that may benefit more than others?
- In your country, who was responsible for establishing and updating the **website** related to the EU Disability Card? How often is the website updated?
- In your country, what measures were taken to ensure the **sustainability** of the system in the long term? Please, provide an overview of the funding mechanisms at the national level.
- In your opinion, to what extent is **cooperation** between relevant authorities successful in ensuring the proper functioning of the EU Disability Card in your country (e.g. information sharing, exchanges of data, financial contribution, observance of deadlines, participation to consultation activities, etc.)?
- In your opinion, are the **costs** associated with the EU Disability Card fairly distributed between relevant stakeholders?
- In your country, were **consultations** with civil society organisations/persons with disabilities organised to define the package of benefits to be offered? How was stakeholder feedback considered in the setting up of the EU Disability Card system at the national level? In your opinion, to what extent do current benefits and services respond to the actual needs of persons with disabilities?
- In your country, was a **database** of service providers, eligible persons and cardholders established? If yes, who was responsible for the databases establishment/uploading/maintenance?
- In your country, were **security mechanisms** established to protect from frauds related to the EU Disability Card? May you briefly describe how the anti-fraud mechanisms work and the related costs?
- In your country, does the EU Disability Card cover all four **sectors in scope** (leisure, sport, culture, transport)? Which sector is covered the least and why? What are the main **benefits** covered in the different sectors in scope (i.e. discounts, tariff

reduction, free entrance, services)? Do such benefits also apply to assistants of persons with disabilities?

- In your opinion, to what extent were service providers properly selected to ensure that the **needs** of persons with disabilities were covered?
- In your country, do the services and benefits covered by the **national disability card** correspond to the services/benefits covered by the EU Disability Card? If no, why?
- Based on your experience, what could be the main **problems with the use** of the EU Disability Card in your country?
- In your country, were **complaints mechanisms** established and who will be responsible for handling complaints?
- In your country, what activities were carried out to **promote the EU Disability Card** among service providers and persons with disabilities? Could you provide indicatively:
 - The number of service providers/persons with disabilities reached
 - The costs entailed in awareness-raising activities
- In your opinion, to what extent will the EU Disability Card contribute to increasing the **mobility** of persons with disabilities across Member States?
- To what extent do you think the EU Disability Card will contribute to increase the **participation of foreigners with disabilities** travelling in your country to cultural/sport/leisure activities?
- Have you planned **monitoring activities** (e.g. periodical surveys) aimed at collecting information on the use of the EU Disability Card in your country?
- In the context of this study, we will perform an **online survey** to thoroughly understand the functioning of the EU Disability Card systems at the national level. We will involve the DCNO as a key informant, may we refer to you or do you suggest somebody else to be contacted?

15. Survey questionnaires

15.1. First-round

European level

N.	Question	Survey answer
1	Your first name:*	
2	Your last name:*	
3	Your email address:*	
4	Your organisation/institution:*	
5	Your title/function:*	a. Management

N.	Question	Survey answer
		b. Staff
		c. Other (Please, specify)
6	In your opinion, to what extent do the existing differences in national legal and administrative systems (e.g. different eligible criteria, different production and delivery mechanisms, etc.) represent an obstacle to the effective implementation of the EU Disability Card?	a. Not at all
		b. Slightly
		c. Fairly
		d. Very much
		e. Completely
		f. N/A
7	In your opinion, to what extent is the definition of disability harmonised across Member States?	a. Not at all
		b. Slightly
		c. Fairly
		d. Very much
		e. Completely
		f. N/A
8	What are the main differences in the definition of disability adopted by Member States?	
9	To what extent do the differences in national definitions of disability represent an obstacle to the mobility of persons with disabilities across Europe?	a. Not at all
		b. Slightly
		c. Fairly
		d. Very much
		e. Completely
		f. N/A
10	In your opinion, to what extent do current services respond to actual needs of persons with disabilities in the different sectors?	ROWS
		a. Culture
		b. Leisure
		c. Sport
		d. Private transport
		e. Public transport
		COLUMNS
		a. Not at all
		b. Slightly
		c. Fairly
		d. Very much
		e. Completely
		f. N/A
11	In your opinion, what are the key needs not covered by current benefits/services, if any?	a. Not at all
		b. Slightly
		c. Fairly
		d. Very much
		e. Completely
		f. N/A

N.	Question	Survey answer
12	In your opinion, to what extent were the benefits service providers offered well selected to cover the needs of persons with disabilities?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
13	Please, specify your answer.	
14	In your opinion, to what extent were the opinions of persons with disabilities considered for the definition of package of benefits?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
15	In your opinion, to what extent were international/EU civil society organisations consulted to define the package of benefits to be covered with the EU Disability Card?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
16	In your opinion, to what degree have mechanisms been established to safeguard persons with disabilities in case of:	ROWS a. Unauthorised duplication of the EU Disability Card b. Unauthorised use of personal information c. Fraud of the EU Disability Card d. Other (please, specify) COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
17	Based on your experience, what are the main problems related to the use of the EU Disability Card?	
18	Based on your experience, to what extent do you deem the available complaint mechanisms as appropriate to address the problems experienced with the use of the EU Disability Card?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A

N.	Question	Survey answer
19	In your opinion, to what extent were the awareness-raising activities carried out at the national level able to promote the EU Disability Card among persons with disabilities?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
20	Did your organisation perform any promotional activity to inform potential beneficiaries about the EU Disability Card?	a. Yes b. No
21	In your opinion, to what extent did the EU Disability Card contribute to increasing the mobility of persons with disabilities across Member States?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
22	In your opinion, to what extent did the EU Disability Card contribute to increasing the participation of persons with disabilities in cultural events?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
23	In your opinion, to what extent did the EU Disability Card contribute to increasing the participation of persons with disabilities in sport events?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
24	In your opinion, to what extent did the EU Disability Card contribute to increasing:	ROWS a. The number of public providers offering benefits to persons with disabilities b. The number of private providers offering benefits to persons with disabilities COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
25	Please, specify your answer.	
26		ROWS

N.	Question	Survey answer
	In your opinion, to what extent did the EU Disability Card contribute to increasing:	a. The number of persons with disabilities accessing the services provided b. The number of persons without disabilities accessing the services provided COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
27	Please, specify your answer.	
28	Do you perform any of the following monitoring activities on the EU Disability Card system?	ROWS a. Periodic surveys b. Internal registration c. Others (please, specify)
29	If yes, what kind of data do you collect?	a. Personal data b. Administrative data c. Aggregate statistics d. Other (please, specify)
30	Could you share any example of good practices related to the EU Disability Card?	
31	In your opinion, what are the main areas of improvement needed to expand the use of the EU Disability Card across Europe?	
32	In your opinion, what areas of improvement could increase cross-border mobility of persons with disabilities?	
33	In your opinion, to what extent did the EU Disability Card encourage providers to improve the accessibility of their building/vehicle/service (e.g. ramps, inclusive bathrooms, audio guides, etc.)?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A
34	Are you aware of cases of complaints by persons with disabilities from a country not participating to the EU Disability Card project, who was refused any benefit/service due to lack EU Disability Cardholder status?	a. Yes b. No
35	If yes, please can you further detail your answer?	
36	In your opinion, to what extent did the establishment of the EU Disability Card system represent an opportunity	a. Not at all b. Slightly

N.	Question	Survey answer
	to increase Member State cooperation in the area of disability?	c. Fairly
		d. Very much
		e. Completely
		f. N/A
37	Would you like to be involved in future consultations for this study?	a. Yes
		b. No

National level

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
1	Your first name:*		x	x	x	x		x
2	Your last name:*		x	x	x	x		x
3	Your email address:*		x	x	x	x		x
4	Your country:*	a. Belgium	x	x	x	x	x	x
		b. Cyprus						
		c. Estonia						
		d. Finland						
		e. Italy						
		f. Malta						
		g. Romania						
		h. Slovenia						
5	Your organisation/institution:*		x	x	x	x		x
6	Your title/function:*	a. Management	x	x	x	x		x
		b. Staff						
		c. Other (Please, specify)						
7	Please specify your role:*	a. EU Disability Card National Organisation	x	x	x	x		x
		b. Public Authority						
		c. Civil society organisation concerned with disability						
		d. Person with disabilities						
		e. Service provider						
		f. Academic expert/research institute						
		g. Other (please, specify)						
8	Please specify your sector:*	a. Culture			x			
		b. Leisure						
		c. Sport						
		d. Transport						
9	Please specify:*	a. Private service provider			x			
		b. Public service provider						
10	Your year of birth:*						x	
11	Your gender:*	a. Male					x	
		b. Female						
12	Your level of schooling:*	a. High school or less					x	
		b. University degree or equivalent						
13	Your employment status:*	a. Employed					x	
		b. Not working and looking for a job						
		c. Neither working nor looking for a job						
		d. Retired/ pensioner						
		e. Student or in training						
14		a. National level	x	x				x

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		b. Subnational level						
		c. Local level						
		d. Multi-level (please, specify)						
15	In your country, the EU Disability Card is managed at the:	a. Public, at the national level	x	x				x
		b. Public, at the subnational level						
		c. Public, at the local level						
		d. Private and public						
		e. Other (please, specify)						
16	Please, describe your answer.		x	x				x
17	In your country, what is the definition of disability provided by national legislation?		x	x		x		x
18	In your country, has the national definition of disability changed following the adoption of the EU Disability Card?	a. Yes	x	x		x		x
		b. No						
19	If yes, please further describe how the definition was modified.		x	x		x		x
20	Please, could you provide the eligibility criteria to receive the EU Disability Card as defined by national legislation in your country?		x	x		x	x	x
21	In your country, the EU Disability Card is issued based on:	a. Previous certificates and/or disability entitlements	x	x		x	x	x
		b. A new assessment						
		c. Other (please, specify)						
22	In your country, which organisation is responsible for assessing the eligibility criteria to receive the EU Disability Card (i.e. the authority in charge of verifying whether the applicant matches the eligibility criteria)?	a. EU Disability Card National Organisation	x	x		x	x	x
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
23	In your country, how many persons are eligible to receive the EU Disability Card?		x	x				
24	In your country, was a database of eligible persons established?	a. Yes	x	x				
		b. No						
25	If yes, the establishment of the database was:	a. Inhouse	x	x				
		b. Subcontracted to a private entity						
		c. Subcontracted to a civil society organisation						
		d. Other (Please, specify)						
		e. Not established						
26	In your country, which organisation is responsible for the eligible persons database in terms of:	ROWS	x	x				
		a. Establishing the database						
		b. Uploading information to the database						
		c. Updating information on the database						
		d. Maintenance of the database						
		COLUMNS						
		a. EU Disability Card National Organisation						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
		f. Not established						
27	In your country, which organisation is responsible for issuing the EU Disability Card (i.e. the authority in charge of deciding whether the EU Disability Card may be released):	a. EU Disability Card National Organisation	x	x		x		x
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
28	Please provide the name/organisation responsible for issuing the EU Disability Card in your country (i.e. the authority in charge of deciding whether the EU Disability Card may be released).		x	x		x		x
29	In your country, how many EU Disability Cards were issued?	ROWS	x	x				
		a. 2015						
		b. 2016						
		c. 2017						
		d. 2018						
		COLUMNS						
		Number of Cards						
30	In your country, was a database of holders of the EU Disability Card established?	a. Yes	x	x				
		b. No						
31	If yes, the establishment of the database was:	a. Inhouse	x	x				
		b. Subcontracted to a private entity						
		c. Subcontracted to a civil society organisation						
		d. Other (Please, specify)						
		e. Not established						
32	In your country, which organisation is responsible for the cardholder database in terms of:	ROWS	x	x				
		a. Establishing the database						
		b. Uploading information to the database						
		c. Updating information on the database						
		d. Maintenance of the database						
		COLUMNS						
		a. EU Disability Card National Organisation						
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
		f. Not established						
33	In your country, how many EU Disability Card applications were received?	ROWS	x	x				
		a. 2015						
		b. 2016						
		c. 2017						
		d. 2018						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		COLUMNS						
		Number of EU Disability Card applications						
34	In your country, the submission of the applications for the EU Disability Card is:	a. Online	x	x			x	x
		b. At physical office						
		c. Both at physical office and online						
		d. Other (please, specify)						
35	In your country, which organisation is responsible for managing the applications for the EU Disability Card (i.e. the authority in charge of checking whether applications comply with application procedures)?	a. EU Disability Card National Organisation	x	x			x	x
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
36	In your country, was a helpline for the EU Disability Card established?	a. Yes	x	x		x	x	
		b. No						
37	If yes, does the helpline give support to:	a. Applying to the EU Delivery Card	x	x		x	x	x
		b. Using the EU Disability Card						
		c. Other (please, specify)						
38	In your country, is the helpline:	a. Inhouse	x	x				
		b. Subcontracted to a private entity						
		c. Subcontracted to a civil society organisation						
39	In your opinion, to what extent is the application process to obtain the EU Disability Card in your country user-friendly?	a. Not at all	x	x		x	x	x
		b. Slightly user-friendly						
		c. Fairly user-friendly						
		d. Highly user-friendly						
		e. Completely						
		f. N/A						
40	Please, specify your answer.		x	x		x	x	x
41	In your country, what is the average time between the submission of the application and the reception of the EU Disability Card?	a. One week	x	x			x	
		b. Two weeks						
		c. One month						
		d. Three months						
		e. Six months						
		f. More (please, specify)						
42	In your country, which organisation is responsible for recruiting service providers (i.e. the authority in charge of selecting the service providers which want to participate to the EU Disability Card)?	a. EU Disability Card National Organisation	x	x	x	x		x
		b. Public Authority						
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
43	In your country, how does the recruiting of service providers occur?	a. Official call for interests	x	x	x			x
		b. Individual contacts						
		c. Other (please, specify)						
44	In your country, how many service providers were recruited?	ROWS	x	x				x
		a. 2015						
		b. 2016						
		c. 2017						
		d. 2018						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		COLUMNS						
		Total number of service providers						
45	In your opinion, to what extent were a sufficient number of benefit/services providers recruited to cover the needs of persons with disabilities?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A	x	x		x	x	
46	In your country, was a database of service providers established?	a. Yes b. No	x	x				
47	If yes, the establishment of the database was:	a. In-house b. Subcontracted to a private entity c. Subcontracted to a civil society organisation d. Other (Please, specify)	x	x				
48	In your country, which organisation is responsible for the service providers database in terms of:	ROWS a. Establishing the database b. Uploading information to the database c. Updating information on the database d. Maintenance of the database COLUMNS a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Civil society organisation e. Other (please, specify) f. Not established	x	x				
49	In your country, which organisation is responsible for maintaining contacts with the service providers (i.e. the authority of reference for service providers which need to make notice of their participation/removal from participation to the EU Disability Card)?	a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Civil society organisation e. Other (please, specify)	x	x	x			x
50	In your country, how does contact with service providers work?	a. Emails b. Phone/skype conferences c. In person meetings d. Other (please, specify)	x	x	x			x
51	In your country, is there a National Disability Card?	Yes No	x	x		x		
52	If a National Disability Card exists in your country, what kind of benefits are provided?	ROWS a. Culture b. Leisure c. Sport d. Private transport e. Public transport COLUMNS a. Free entrance b. Price reduction	x	x				

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		c. Service (e.g. Audio guide, braille-guide) d. Other (please, specify)						
53	Please indicate, on average, the price reduction that is offered to National Disability Cardholders?	a. 0-24% b. 25-49% c. 50-74% d. 75-99% e. 100% (free entrance)			x			
54	In your country, does the National Disability Card provide benefits also for the assistants of persons with disabilities?	a. Yes b. No			x			
55	If yes, please indicate, on average, the price reduction that is offered to the assistants of National Disability Cardholders?	a. 0-24% b. 25-49% c. 50-74% d. 75-99% e. 100% (free entrance)			x			
56	Please, indicate, on average, the percentage of National Disability Cardholders who have an assistant in your country.	a. 0-24% b. 25-49% c. 50-74% d. 75-99% e. 100% (free entrance)			x			
57	In your country, what are the sectors covered by the EU Disability Card?	a. Culture b. Leisure c. Sport d. Public transport e. Private transport	x	x	x	x	x	x
58	In your country, what are the benefits provided by the EU Disability Card for each sector?	ROWS a. Culture b. Leisure c. Sport d. Private transport e. Public transport COLUMNS a. Free entrance b. Price reduction c. Service (e.g. Audio guide, braille-guide) d. Other (please, specify)	x	x	x	x	x	x
59	Please indicate, on average, the price reduction that is offered to EU Disability Cardholders	a. 0-24% b. 25-49% c. 50-74% d. 75-99% e. 100% (free entrance)			x			
60	Please, indicate the average price of a regular entrance ticket at your site.				x			
61	In your country, does the EU Disability Card provide benefits also to the Assistant of persons with disabilities?	a. Yes b. No			x			
62	If yes, please indicate, on average, the price reduction that is offered to the assistants of the EU Disability Cardholders	a. 0-24% b. 25-49% c. 50-74% d. 75-99% e. 100% (free entrance)			x			
63		a. 0-24%			x			

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
	Please, indicate, on average, the percentage of EU Disability Cardholders who have an assistant in your country.	b. 25-49% c. 50-74% d. >75%						
64	In your country, are there differences between the benefits offered by the National Disability Card and the EU Disability Card?	a. Yes b. No	x	x		x		
65	Please, describe your answer.		x	x		x		
66	In your opinion, to what extent do current benefits/services respond to the actual needs of persons with disabilities in the different sectors?	ROWS a. Culture b. Leisure c. Sport d. Private transport e. Public transport COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A				x	x	x
67	In your opinion, what key needs are not covered by current benefits/services, if any?		x	x		x	x	
68	In your opinion, to what extent were the benefits service providers offered well selected to cover the needs of persons with disabilities?	a. Very low extent b. Low extent c. Medium extent d. High extent e. Very high extent f. N/A	x	x	x	x	x	x
69	Please, specify your answer.		x	x	x	x	x	x
70	In your opinion, to what extent was cooperation between authorities involved in the management of the EU Disability Card successful in your country in terms of:	ROWS a. Sharing of information alongside the implementation of the EU Disability Card (assessment, production, delivery, etc.) c. Financial contribution d. Observance of deadlines (e.g. deadlines to print the EU Disability Card by subcontracted bodies, uploading relevant information to the national website, etc.) e. Other (please, specify) COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely	x	x				x

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		f. N/A						
71	Please, describe your answer.		x	x				x
72	Please, describe at least one relevant cooperation practice you have been involved in during the pilot project, if any.		x	x				
73	In your country, were consultations with persons with disabilities carried out to define the package of benefits to be covered with the EU Disability Card?	a. Yes b. No	x	x		x	x	x
74	If yes, which organisation is responsible for contacting the persons with disabilities?	a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Civil society organisation d. Other (please, specify)	x	x		x	x	x
75	If consultations with persons with disabilities were carried out, what tools were used?	a. Focus groups b. Online surveys c. Phone surveys d. Other (please, specify)	x	x		x	x	x
76	Could you please indicate to what extent each tool was able to reach persons with disabilities in your country?	ROWS a. Focus groups b. Online surveys c. Phone surveys d. Other (please, specify) COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely	x	x		x		
77	Could you please indicate the overall number of persons with disabilities reached for consultation?		x	x		x		
78	In your opinion, to what extent was the opinion of persons with disabilities considered?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A				x	x	x
79	In your country, were consultations organised with the civil society organisations to define the package of benefits to be covered with the EU Disability Card?	a. Yes b. No	x	x		x		x
80	If yes, which organisation is responsible for organising consultations with civil society organisations?	a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Other (please, specify)	x	x		x		x
81		a. Focus groups b. Online surveys	x	x		x	x	x

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
	If consultations with civil society organisations were carried out, what tools were used?	c. Phone surveys d. Other (please, specify)						
82	In your opinion, to what extent was the opinion of the civil society organisations considered?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A				x		x
83	In your country, were consultations organised with academic experts/research institutes to define the package of benefits to be covered by the EU Disability Card?	a. Yes b. No	x	x				x
84	In your opinion, to what extent was the opinion of academic experts and research institutes considered?	a. Not at all b. Slightly c. Fairly d. Very much e. Completely f. N/A						x
85	In your country, was the EU Disability Card's website established?	a. Yes b. No	x	x				
86	If yes, the establishment of the website was:	a. Inhouse b. Subcontracted to a private entity c. Subcontracted to a civil society organisation d. Other (Please, specify)	x	x				
87	In your country, is the national website of the EU Disability Card regularly updated?	a. Yes b. No	x	x	x	x	x	x
88	If yes, which organisation is responsible for updating the national EU Disability Card's website?	a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Civil society organisation d. Other (please, specify)	x	x				
89	How often was the EU Disability Card's website updated?	a. Once a month or less b. Once every 2-3 months c. Once every 4-6 months d. Once every 7-11 months e. Once a year or with less frequency	x	x				
90	In your country, which organisation is responsible for producing the EU Disability Card (i.e. the authority/entity in charge of printing the EU Disability Card)?	a. EU Disability Card national organisation b. Public Authority c. Private entity d. Other (please, specify)	x	x				x
91	In your country, the production of the EU Disability Card is:	a. In house b. Outsourced	x	x				x
92	In your country, which organisation is responsible for delivering the EU Disability Card?	a. EU Disability Card National Organisation b. Public Authority c. Private entity d. Civil society organisation e. Other (please, specify)	x	x				x
93		a. In-house	x	x				

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
	In your country, the delivery of the EU Disability Card is:	b. Outsourced						
94	In your country, is the delivery of the EU Disability Card:	a. Fee-based	x	x		x	x	x
		b. Free						
		c. Other (please specify)						
95	If the EU Disability Card delivery is fee-based, please indicate the amount of the fee.		x	x		x	x	x
96	In your country, what mechanisms are established to safeguard persons with disabilities in case of:	ROWS	x	x		x	x	x
		a. Unauthorised duplication of the EU Disability Card						
		b. Unauthorised use of personal information						
		c. Fraud of the EU Disability Card						
		d. Other (please, specify)						
		COLUMNS						
		a. The EU Disability Card contains a microchip						
		b. The EU Disability Card is registered online						
		c. None						
		d. Other (please, specify)						
97	In your country, are there mechanisms to ensure the protection of the data contained in the databases?	ROWS	x	x		x	x	x
		a. Database of eligible persons						
		b. Database of cardholders						
		c. Database of service providers						
		COLUMNS						
		a. Yes						
		b. No						
98	If yes, please further describe the mechanisms.		x	x		x	x	x
99	Based on your experience, what have been the main problems related to the use of the EU Disability Card in your country?	a. Low awareness of service providers when showing the EU Disability Card	x	x		x	x	
		b. Low awareness of organisations involved in cultural, sport, tourism, and transport services						
		c. Other (please, specify)						
100	In your country, which sectors encountered the most problems?	a. Culture	x	x		x	x	
		b. Leisure						
		c. Sport						
		d. Public transport						
		e. Private transport						
101	In your country, were complaint mechanisms for the functioning of the EU Disability Card established?	a. Yes				x	x	
		b. No						
102	If yes, please further describe the mechanisms.					x	x	
103	In your country, which is the authority responsible for handling complaints?	a. DCNOs	x	x		x		
		b. National Public Authority						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		c. Private entity						
		d. Civil society organisation						
		e. Other (please, specify)						
104	Based on your experience, to what extent do you deem the available complaint mechanisms as appropriate to address the problems you experienced with the use of the EU Disability Card?	a. Not at all				x	x	
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
105	In your country, were awareness-raising activities organised to promote the EU Disability Card?	a. Yes	x	x	x	x	x	x
		b. No						
106	In your country, what kind of activities were carried out to raise awareness on the EU disability Card?	a. Brochures in multiple languages	x	x	x	x	x	x
		b. Communication campaigns						
		c. Social media campaigns						
		d. Training sessions						
		e. Events, conferences, meetings						
		f. Exhibition/festival						
		g. Press conference						
		h. Public debate/roundtable						
		i. Other (please, specify)						
107	In your country, promotion activities were targeted to:	a. National cardholders	x	x	x	x	x	x
		b. Public service providers						
		c. Private service providers						
		d. Foreign cardholders visiting the country						
		e. Civil Society Organisations						
		f. Businesses/companies						
		g. Persons with disabilities						
		h. Educational staff/teachers						
		i. Authorities for data protection						
		j. Health care professionals						
		k. Other (please, specify)						
108	In your opinion, to what extent were the activities carried out to promote the EU Disability Card able to reach their target?	a. Not at all	x	x	x	x	x	x
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
109	Please, specify your answer.		x	x	x	x	x	x
110	In your country, what communication tools were used?	a. Mobile apps	x	x	x	x	x	x
		b. Social network						
		c. TV/audio spot/advertisement						
		d. Website/blog						
		e. Newsletter						
		f. CD/DVD						
		g. E-book						
		h. Film/video						
		i. Newspaper/magazine						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		j. Podcast						
		k. Other (please, specify)						
111	Did you create advertisements with specific reference to the EU Disability Card?	a. Yes			x			
		b. No						
112	Do you perform any of the following monitoring activities on the EU Disability Card system?	a. Periodic surveys	x	x	x	x		x
		b. Internal registration						
		c. Others (please, specify)						
113	If yes, what kind of data do you collect?	a. Personal data	x	x	x	x		x
		b. Administrative data						
		c. Aggregate statistics						
		d. Other (please, specify)						
114	Please, specify your answer.		x	x	x	x		x
115	Did you perform any evaluation of the EU Disability Card?	a. Yes	x	x				
		b. No						
116	If yes, could you provide any reference to the evaluation?		x	x				
117	In your opinion, to what extent did the EU Disability Card contribute to increasing the mobility of persons with disabilities across Member States?	a. Not at all	x	x	x	x	x	x
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
118	In your opinion, to what extent did the EU Disability Card contribute to increasing the participation of persons with disabilities in cultural events?	a. Not at all	x	x	x	x	x	x
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
119	In your opinion, to what extent did the EU Disability Card contribute to increasing the participation of persons with disabilities in sport events?	a. Not at all	x	x	x	x	x	x
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
120	In your opinion, to what extent did the EU Disability Card contribute to increasing:	ROWS	x	x	x	x	x	x
		a. The number of public providers offering benefits to persons with disabilities						
		b. The number of private providers offering benefits to persons with disabilities						
		COLUMNS						
		a. Not at all						
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
121	Please, specify your answer.		x	x	x	x	x	x
122	In your opinion, to what extent did the EU Disability Card contribute to increasing:	ROWS	x	x	x	x	x	x
		a. The number of persons with disabilities accessing the services provided						
		b. The number of persons without disabilities						

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		accessing the services provided						
		COLUMNS						
		a. Not at all						
		b. Slightly						
		c. Fairly						
		d. Very much						
		e. Completely						
		f. N/A						
123	Please, specify your answer.		x	x	x	x	x	x
124	Since 2015, how many tickets did you issue yearly to persons with disabilities (including EDC holders)?	ROWS a. 2015 b. 2016 c. 2017 d. 2018			X			
		COLUMNS a. Total number of tickets						
125	Since the implementation of the EDC, how many tickets did you issue yearly to EDC holders?	ROWS a. 2016 b. 2017 c. 2018			X			
		COLUMNS a. Total number of tickets						
126	On average, for each EU Disability Cardholder, how many additional visitors (members of the family, friends, etc.) pay the full price of the ticket?	a. N/A b. 1-2 c. 3-4 d. More			x			x
127	Could you share any examples of good practices adopted in your country related to the EU Disability Card?		x	x	x	x	x	x
128	In your country, are you aware of cases of complaints from persons with disabilities from a country not participating to the EU Disability Card project, who were refused any benefit/service due to lack of EU Disability Cardholder status?	a. Yes b. No	x	x	x			
129	In your country, what were the main problems related to the EU Disability Card?		x	x	x	x	x	x
130	In your opinion, what are the areas of improvement to consider in expanding the use of the EU Disability Card across Europe?		x	x	x	x	x	x
131	In your opinion, what areas could be improved to increase cross-border mobility of persons with disabilities?		x	x	x	x	x	x

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
132	To what extent did the Card contribute to increasing your:	ROWS a. Mobility for tourism activities across Member States b. Participation in cultural events c. Participation in sporting events COLUMNS a. Not at all b. Slightly c. Fairly d. Very much e. Completely					x	
133	Could you please indicate the costs incurred to set up the EU Disability Card National Organisation?	a. FTE b. EUR (please, specify the type of cost and related amount)	x	x				
134	Could you please indicate the costs incurred to establish the website of the EU Disability Card in your country?	a. FTE b. EUR (please, specify the type of cost)	x					
135	Could you please indicate the average costs incurred to update the national EU Disability Card's website?	FTE	x	x				
136	Could you please indicate the costs related to the database of eligible persons in terms of:	ROWS a. Establishing the database b. Uploading information to the database c. Updating information on the database d. Maintenance of the database e. Not established COLUMNS FTE	x	x				
137	Could you please indicate the costs related to the database of cardholders in terms of:	ROWS a. Establishing the database b. Uploading information to the database c. Updating information on the database d. Maintenance of the database COLUMNS FTE	x	x				
138	Could you please indicate the costs related to the database of service providers in terms of:	ROWS a. Establishing the database b. Uploading information to the database c. Updating information on the database d. Maintenance of the database COLUMNS	x	x				

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
		FTE						
139	Could you please indicate the costs incurred to carry out awareness-raising activities?	FTE EUR (please, specify the type of cost)	x	x	x			
140	Could you please indicate the costs incurred to manage the EU Disability Card applications received (i.e. costs per application)?	ROWS a. 2015 b. 2016 c. 2017 d. 2018	x	x				
		ANSWERS						
		FTE						
141	Could you please indicate the costs incurred to keep the helpline running?	FTE	x	x		x	x	x
142	Could you please indicate the costs incurred to recruit the service providers?	ROWS a. 2015 b. 2016 c. 2017 d. 2018	x	x				
		COLUMNS						
		FTE						
143	Could you please indicate the costs incurred for maintaining contact with the service providers?	ROWS a. 2015 b. 2016 c. 2017 d. 2018	x	x				
		COLUMNS						
		FTE						
144	Could you please indicate the costs incurred for managing contact with the competent authorities of the EU Disability Card?	ROWS a. 2015 b. 2016 c. 2017 d. 2018			x			
		COLUMNS						
		FTE						
145	Since 2015, did you make any change to improve the accessibility of your building/vehicle/service (e.g. ramps, inclusive bathrooms, audio guides, etc.)?	ROWS a. 2015 b. 2016 c. 2017 d. 2018			x			
		COLUMNS						
		a. Yes						
		b. No						
	If yes, please specify your answer				x			
146		ROWS a. 2015	x	x				

N	Question	Survey answer	DCNO	PA	SP	CSO	DP	AE
	Could you please indicate the costs incurred to contact persons with disabilities?	b. 2016 c. 2017 d. 2018 COLUMNS FTE						
147	Could you please indicate the costs incurred to consult civil society organisations?	ROWS a. 2015 b. 2016 c. 2017 d. 2018 COLUMNS FTE	x	x				
148	Could you please indicate the costs incurred to produce the EU Disability Card (i.e. costs per card)?	FTE EUR (please, specify the type of cost and related amount)	x	x				
149	Could you please indicate the costs incurred to deliver the EU Disability Card?	FTE EUR (please, specify the type of cost)	x	x				
150	Could you please indicate the costs incurred for the establishment of security mechanisms?	FTE EUR (please, specify the type of cost)	x	x				
151	Would you like to be involved in future consultations for this study?	a. Yes b. No	x	x	x	x	x	x

15.2. Second round

N	Question	Survey answer	SP	DP
1	Your email address:		x	
2	You are replying to the survey:	On my own With the help of a friend/relative or my assistant With the help of my association for persons with disabilities		x
3	Your country:	a. Belgium b. Cyprus c. Estonia d. Finland e. Italy f. Malta g. Romania h. Slovenia	x	x
4	Your age:	18-34 35-49 50-64 65 or older Prefer not to say		x
5	Your gender:	Female Male Genderqueer/Non-binary Prefer not to say		x

N	Question	Survey answer	SP	DP
6	Your level of schooling:	High school or less University degree or equivalent Prefer not to say		x
7	Your employment status:	Employed Self-employed Not working and looking for a job (i.e. unemployed) Not working nor looking for a job (i.e. not in the labour force) Retired/ pensioner Student or in training Prefer not to say		x
8	If you are employed, which of the following best describes your type of occupation?	Managerial, professional, higher technical, and higher administrative job Clerk or skilled non-manual job (head of office, bank teller, payroll officer, graduated hospital nurse, schoolteacher, etc.) Unskilled non-manual worker (shop assistants, bar tender, waiter, etc.) Skilled manual worker (carpenter, mechanic, locksmith, plumber, electrician, driver etc.) Unskilled manual workers (janitor, housekeeper, farmhand, labourer, sweeper, delivery man, etc.) Prefer not to say		x
9	If you are self-employed, which of the following best describes your type of occupation?	Entrepreneur (14 or more employees) Professional (notary, architects, general practitioner, etc.) Self-employed/small entrepreneur (less than 14 employees): carpenter, motor vehicle mechanic, retailer, farmer, fisher, livestock producer, etc. Prefer not to say		x
10	How did you find out about the EU Disability Card?	Advertisements on TV, radio, Internet etc. From an Association that represents persons with disabilities From other associations working in the social sector From other professionals working with persons with disabilities Direct invitation by a national authority Direct invitation by a regional/local authority From a friend/relative Prefer not to say		x
11	Why have you applied for the EU Disability Card?	Because it is an official EU document certifying my impairment Because of the Card benefits I got the Card because my acquaintances also applied I found the Card useful for my family members/friends I have heard about good user experience regarding the Card		x
12	In your opinion, to what extent is the application process to obtain the EU Disability Card in your country user-friendly?	Very user-friendly Fairly user-friendly Slightly user-friendly Not at all		x
13	How likely are you to recommend the EU Disability Card to other users? (0= not at all, 10= extremely likely)	0-10 horizontal scale		x

N	Question	Survey answer	SP	DP
1 4	In your opinion, to what extent do the benefits/services provided by the EU Disability Card respond well to the needs of persons with disabilities in the different sectors?	ROWS Culture Leisure Sport Private Transport Public Transport COLUMNS Very much Fairly Slightly Not at all		x
1 5	In your opinion, to what extent is the number of benefits/service providers (museums, theatres, sport events, transport, etc.) sufficient to cover the needs of persons with disabilities?	Very much Fairly Slightly Not at all		x
1 6	In your country, are there any complaint mechanisms in place (e.g. customer protection service) if you have problems using the EU Disability Card?	Yes No I do not know Prefer not to say		x
1 7	Based on your experience, to what extent have these complaint mechanisms helped you solve a problem you faced?	Very much Fairly Slightly Not at all		x
1 8	In the past 12 months, how many times have you used the EU Disability Card in each of the following sectors:	ROWS Culture Leisure Sport Private Transport Public Transport COLUMNS Never 1-2 times 3-5 times 6-10 times More than 10 times		x
1 9	To what extent did the Card contribute to increasing your own:	ROWS Tourism activities abroad Participation in cultural activities and events Participation in sport activities and events COLUMNS Very much Fairly Slightly Not at all		x
2 0	In your opinion, to what extent did the EU Disability Card allow persons with	ROWS Their tourism activities abroad Their participation in cultural activities and events Their participation in sport activities and events		x

N	Question	Survey answer	SP	DP
	disabilities in your country to increase:	COLUMNS Very much Fairly Slightly Not at all		
2 1	In your opinion, to what extent did the EU Disability Card allow persons with disabilities from other countries to increase:	ROWS Their tourism activities abroad Their participation in cultural activities and events Their participation in sport activities and events COLUMNS Very much Fairly Slightly Not at all		x
2 2	In your opinion, which key needs are not covered by current benefits/services, if any?	The transport sector is not covered (mobility need) The leaflets are not available in Braille (inclusion need) Audio-guides specific for blind/visually impaired are not available (inclusion need) Other, please specify		x
2 3	In your country, what are the main problems related to the EU Disability Card?	Low awareness among service providers when presenting the EU Disability Card Low number of organisations involved in cultural, sport, tourism, and transport services The discounts are too limited Benefits are not offered to personal assistants/friends/family members etc. The benefits/providers are available only in major cities The eligibility criteria for the EU Disability Card are too strict The EU Disability Card was not advertised enough Low number of Member States where I can use the Card Other, please specify		x
2 4	In your opinion, what areas of the EU Disability Card could be improved to increase cross-border mobility of persons with disabilities?	All Member States should participate Transport benefits should be increased More online information about the accessibility of the museums/concert halls/stadiums to better plan the trip Leaflets in the museums should be made available in my mother-tongue An international, free helpline could answer my questions There should be discounted international travel tickets There should be discounted accommodation abroad Other, please specify		x
2 5	To be effective, do you think that the EU Disability Card should be accompanied by measures aimed at increasing accessibility to services?	Yes No		X
2 6	If yes, in which sectors should accessibility of services be addressed the most?	ROWS a. Public service b. Private service COLUMNS Culture Leisure Sport Transport		x
2 7	To be effective, do you think that the EU Disability Card should be accompanied by measures making compulsory the provision of	Yes No		X

N	Question	Survey answer	SP	DP
	reasonable accommodation?			
28	If yes, in which sectors should reasonable accommodation in services be addressed the most?	Culture Leisure Sport Public transport Private transport		X
29	Your organisation/institution:*		X	
30	Your title/function:*	Management Staff Other	x	
31	Please specify your sector:*	Culture Leisure Sport Transport Other, please specify	x	
32	Please specify:*	Public provider Private provider Other, please specify	x	
33	How did you find out about the EU Disability Card?	Advertisements on TV, radio, Internet etc. From an Association that represents persons with disabilities From other associations working in the social sector From other professionals working with persons with disabilities Direct invitation by a national authority Direct invitation by a regional/local authority From other service providers From a friend/relative Prefer not to say	x	
34	How likely are you to recommend the EU Disability Card to other providers? (0= not at all, 10= extremely likely)	0-10 horizontal scale	x	
35	How did you decide about the package/benefit/offer provided?	You have been obliged by national legislations You offer the same benefits already offered to nationals to foreigners with disabilities as well Other, please specify	x	
36	Did you have to search for additional legal information in order to participate to the EU Disability Card initiative?	No Yes, to understand about public subsidies Yes, to verify accessibility requirements Yes, other reasons, specify	x	
37	Do you consider the procedure to request your participation in the EU Disability Card initiative straightforward and effortless?	Very much Fairly Slightly Not at all	x	
38	Could you please indicate the average price for the service/offer you provide?	Free entrance 1-5 Euro 6-10 Euro 11-20 Euro 21-30 Euro More than 30 Euro	x	

N	Question	Survey answer	SP	DP
39	Could you please indicate, on average, the price reduction that you offered to nationals with disabilities prior to the introduction of the EU Disability Card?	0-24% 25-49% 50-74% 75-99% 100% (free entrance)	x	
40	Did you, at that time, also provide benefits for the assistants of persons with disabilities?	Yes No Some, please specify	x	
41	If yes, could you please indicate, on average, the price reduction that you offered to the assistants of nationals with disabilities prior to the introduction of the EU Disability Card?	0-24% 25-49% 50-74% 75-99% 100% (free entrance)	x	
42	Please, indicate, on average, the percentage of nationals with disabilities who access your service/offer together with a personal assistant.	0-24% 25-49% 50-74% 75-100%	x	
43	Could you please indicate, on average, the price reduction that you offer to EU Disability Cardholders from your country?	0-24% 25-49% 50-74% 75-99% 100% (free entrance)	x	
44	Could you please indicate, on average, the price reduction that you offer to EU Disability Cardholders from other Member States?	0-24% 25-49% 50-74% 75-99% 100% (free entrance)	x	
45	Do you also provide benefits to the assistants of EU Disability Cardholders?	Yes No	x	
46	Could you please indicate, on average, the price reduction that you offer to the assistants of EU Disability Cardholders?	0-24% 25-49% 50-74% 75-99% 100% (free entrance)	x	

N	Question	Survey answer	SP	DP
4 7	Could you please indicate, on average, the percentage of EU Disability Cardholders who access your service/offer together with a personal assistant?	0-24% 25-49% 50-74% 75-100%	x	
4 8	Since 2015, could you estimate how many tickets you annually issued to persons with disabilities (including EU Disability Cardholders)?	ROWS 2015 2016 2017 2018 COLUMNS 0-50 51-100 101-250 251-500 501-750 751-1000 More than 1000	x	
4 9	Since 2016, could you estimate how many tickets you annually issued to EU Disability Cardholders from your country?	ROWS 2016 2017 2018 COLUMNS 0-50 51-100 101-250 251-500 501-750 751-1000 More than 1000	x	
5 0	Since 2016, could you estimate how many tickets you annually issued to EU Disability Cardholders from other Member States?	ROWS 2016 2017 2018 COLUMNS 0-50 51-100 101-250 251-500 501-750 751-1000 More than 1000	x	
5 1	In your opinion, to what extent did the EU Disability Card contribute to increasing the number of nationals with disabilities accessing your service/offer?	Not at all Slightly Fairly Very much	x	
5 2	In your opinion, to what extent did the EU Disability Card contribute to increasing the number of foreigners with disabilities	Not at all Slightly Fairly Very much	x	

N	Question	Survey answer	SP	DP
	accessing your service/offer?			
5 3	On average, how many additional paying persons (members of the family, friends, etc.) access your service/offer together with an EU Disability Cardholder?	0 1-2 3-4 5 or more	x	
5 4	Since 2016, did you make any changes to improve the accessibility of your service/offer (ramps, inclusive bathrooms, audio guides, etc.)?	Yes No	x	
5 5	If yes, you made the change because:	You were obliged by legislation For business opportunities You were requested by persons with disabilities Other, please specify	x	
5 6	Do you receive any financial support to ensure the accessibility of your service/offer?	Yes (please, specify what kind of support you received) No	x	
5 7	Would you have carried out additional changes if you got more financial support?	Yes No	x	
5 8	Through the introduction of the EU Disability Card... (1=strongly disagree, 4=strongly agree)	ROWS I have gained positive visibility I take better account of persons with disabilities in our services I have benefited from positive feedback from persons with disabilities I better understand the importance of accessibility to services I have attracted new customers I have developed services together with persons with disabilities I have gained new insights for the future development of our services I better recognise the importance of our organisation's role in providing accessible services Something else? COLUMNS 1 2 3 4 This does not apply	x	
5 9	If you haven't experienced any such benefits with the introduction of the EU Disability Card, why not?	ROWS The total costs far exceeded the benefit. Card users assume that an assistant is always admissible free of charge We have received more criticism regarding accessibility We are expected to have special skills or services that we cannot provide Something else? COLUMNS Yes No	x	
6 0	Do you perform any of the following monitoring	Periodic surveys Internal registration Reporting to a public body	x	

N	Question	Survey answer	SP	DP
	activities on the EU Disability Cardholders who access your service/offer?	Other, please specify		
6 1	Do you perform any of the following satisfaction assessments on your service?	Yes, on the spot Yes, online Yes, other (please specify) No	x	
6 2	If yes, how often do you perform such assessments?		x	

16. The synopsis report

16.1. Objectives

This report summarises the outcomes of the targeted consultations conducted as part of the Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits³⁹⁵. The results of the study will allow the European Commission to consider how to best follow up on this pilot action and feed into the exchange of good practices on service provision for persons with disabilities and the evaluation of the European Disability Strategy 2010-2020.

Consultation with stakeholders was aimed at retrieving information and direct opinions about the usefulness and cost-effectiveness of the Card implementation both at the EU and national levels.

The information collected from stakeholders has been channelled into all parts of the study, most notably: background of the Card, implementation state of play, impact of the initiative.

The purpose of this summary document is to provide a structured and succinct overview of the main outcomes of the stakeholder consultations.

16.2. Scope and methodology

The stakeholder consultation was carried out by using three data collection tools: online surveys, interviews and focus groups. The scope and methodology of these data collection tools are presented in the following subsections.

16.2.1. Interviews

The bulk of in-depth interviews was carried out between 19 November 2019 and 12 December 2020. Interviews were conducted by phone.

The tables below contain the list of bodies and organisations approached at the national (Table 56) and EU-levels (Table 57).

Table 56 - Interviews conducted at the national level

MS	Category of stakeholder	Interview conducted on
BE	DCNO	19 November 2019
CY	DCNO	14 November 2019
EE	DCNO	13 November 2019
FI	DCNO	29 November 2019
IT	DCNO	28 October 2019
MT	DCNO	22 November 2019
RO	DCNO	12 December 2019
SI	DCNO	6 December 2019

³⁹⁵ Specific Contract VC/2019/0491 concerning the Request for Services VT/2018/022 "Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits", within the Framework Contract for the "Provision of services related to the implementation of Better Regulation Guidelines" VT/2016/027.

Table 57- Interviews conducted at the EU level

Entity/ Organisation	Date
European Network for Accessible Tourism (ENAT)	13 May 2020
Disabled Peoples' International (DPI) - Europe	5 December 2019
European Disability Forum (EDF)	26 November 2019

16.2.2. Online survey: first round

The first-round survey, implemented between 25 November 2019 and 13 January 2020 (with a duration of seven weeks), targeted a broad number of stakeholders' categories concerned with the Card at both national and EU-level. A total of five questionnaires have been designed and sent out to targeted stakeholders. The survey was conducted via the 'eSurvey' online tool. It was available in different languages (Dutch, English, French, German, Greek, Italian, and Romanian) to address stakeholders' preferences, and tailored questionnaires have been prepared for each category of stakeholders³⁹⁶.

The survey addressed the following stakeholders concerned with the EU Disability Card:

- Disability Card National Organisations (DCNOs);
- Public Authorities (PAs). In the context of the consultation, PAs considered are the following:
 - ✓ BE: Federal Public Service (FPS) Social Security, the Agence pour une Vie de Qualité (AViQ), the Service public francophone Bruxellois (Service Phare), the Vlaams Agentschap voor Personen met een Handicap (VAPH), and the Dienststelle für Selbstbestimmtes Leben (DSL);
 - ✓ EE: Estonian Social Insurance Board³⁹⁷;
 - ✓ FI: Social Insurance Institution of Finland (Kela);
 - ✓ IT: National Social Security Institute (INPS);
 - ✓ RO: General Directorates of Social Assistance and Child Protection (DGASPC);
 - ✓ SI: Ministry of Public Administration, which is responsible for the Slovenian administrative districts;
- Civil society organisations (CSOs);
- European Civil Society Organisations (EU CSOs);
- Service providers (SPs). The following sampling strategy was used to ensure a representative coverage:
 - ✓ For each Member State where the service providers were selected (BE, CY, EE, FI, MT, RO, SI³⁹⁸), only the three major tourist destinations cities were selected based on the total number of yearly visitors in hotels and accommodation facilities;

³⁹⁶ Based on consultation with the national experts, it was agreed that no translation into national language was needed for EE, FI, MT and SI. Translations in Dutch, German and Greek were provided only to civil society organisations and persons with disabilities.

³⁹⁷ Thus, it was considered as DCNO.

³⁹⁸ In IT, service providers have not been recruited yet.

- ✓ Within each selected city, two service providers for each sector in scope were selected i.e. two (i) cultural sites, (ii) concert halls and/or theatres, (iii) stadiums and/or sports facilities, and (iv) transport companies. The service providers were selected based on the total number of yearly visitors/passengers;
- Person with disabilities (DPs). Civil society organisations were asked to identify persons with disabilities to be consulted through the online survey. An anonymous link was specifically created for persons with disabilities in order to comply with privacy issues, and it was requested to send the questionnaire to one beneficiary responding to the following criteria:
 - ✓ Woman under 30 years old;
 - ✓ Man under 30 years old;
 - ✓ Woman aged 30-50 years old;
 - ✓ Man aged 30-50 years old;
 - ✓ Woman aged over 50 years old;
 - ✓ Man over 50 years old.

The surveys sent to the target groups were forwardable to encourage dissemination of the questionnaires among stakeholders. The team additionally undertook a series of actions to improve stakeholder response rate such as:

- Weekly e-mail reminders to all categories starting since the launch of the survey;
- Phone calls reminders to service providers halfway from the launch of the survey and the close date;
- Forwarded e-mails with the online survey link after phone calls;
- Involvement of national experts to request national stakeholders to address the survey.

Overall, **175 replies were received**. The distribution of responses among the stakeholders' categories is reproduced in Table 58 below.

Table 58 – Response rate of the first-round survey

MS	DCNO	Public Authorities	Civil society organisations	Service providers	Persons with disabilities	Total
BE	1	3	6	1	13	24
CY	1	1	7	3	17	29
EE	1	-	4	4	18	27
FI	1	3	10	3	2	19
IT	1	-	3	-	7	11
MT	1	-	2	5	-	8
RO	1	25	3	2	12	43
SI ³⁹⁹	1	-	3	-	1	6
EU	-	-	8	-	-	8
Total	8	32	47	18	70	175

³⁹⁹ The DCNO from SI replied to the questionnaire for CSOs, hence not all questions tailored to the DCNOs were covered from SI. The interview with the DCNO was conducted to fill in the gaps, and the comprehensive responses have been included in the Interim Report.

The analysis focuses on closed questions with the integration of additional inputs from open questions providing relevant clarifications or supplementary information. The analysis was structured according to five main sections:

- Legal and policy background;
- Organisational set up;
- Features of the system;
- Awareness-raising activities;
- Results.

16.2.3. Online survey: second round

The second-round survey, implemented between 4 May 2020 and 31 May 2020 (with a duration of four weeks), targeted only two specific stakeholders' categories at the national level, namely service providers and persons with disabilities. A specific questionnaire was designed for each stakeholder category. The survey was conducted via the 'Google Form' online tool. It was available in different languages (Dutch, English, Finnish, French, German, Greek, Slovenian, and Romanian) both for service providers and for persons with disabilities⁴⁰⁰. It was decided to exclude EE and IT from the consultation, as this second round was focused on the results and costs of the Card.

The survey addressed the following stakeholders concerned with the EU Disability Card:

- Service providers (SPs). A larger sample with respect to the first round was drawn to ensure a representative yet broader coverage:
 - ✓ For each CY and MT all the participating service providers were invited;
 - ✓ For BE, FI, RO, and SI, at least 50 service providers were invited, for each Member State covering all sectors and activity type in the same proportion of the entire list of service providers.
- Persons with disabilities (DPs). Civil society organisations were asked to identify persons with disabilities to be consulted through the online survey. An anonymous link was specifically created for persons with disabilities in order to comply with privacy issues, and it was requested to send the questionnaire to five beneficiaries for each of these categories:
 - ✓ Woman under 30 years old;
 - ✓ Man under 30 years old;
 - ✓ Woman aged 30-50 years old;
 - ✓ Man aged 30-50 years old;
 - ✓ Woman aged over 50 years old;
 - ✓ Man over 50 years old.

⁴⁰⁰ It was agreed that more languages available could make the surveys more accessible and help to increase the participation among Cardholders as well as among service providers.

The surveys sent to the target groups were forwardable to encourage dissemination of the questionnaires among stakeholders. The team additionally undertook a series of actions to improve stakeholder response rate such as:

- An extension of the initial deadline of 16 May 2020 to 22 May 2020;
- Weekly e-mail reminders to all categories starting since the launch of the survey;
- For Member States with initially low response rates, such as MT, FI, and SI, the DCNOs were warmly encouraged to further spread the questionnaire links;
- The request of answering on a printed .pdf was granted once requested (a service provider of CY).

Overall, **384 replies were received**. The distribution of responses among the stakeholders' categories is reproduced in Table 59 below.

Table 59 – Response rate of the second-round survey

MS	Service providers	Persons with disabilities	Total
BE	13	44	57
CY	2	30	31
EE	-	-	-
FI	0	46	46
IT	-	-	-
MT	3	136	139
RO	1	103	104
SI	2	4	6
Total	21	363	384

The analysis focuses on closed questions with the integration of additional inputs within the “other” categories.

16.2.4. Focus groups

Six focus groups were performed: three of these had a national scope, while two covered horizontal topics across different Member States (see Table 60). All focus groups lasted around two hours and were performed on-line through the videoconferencing tool MS Teams.

Table 60 - Overview of the focus groups

Topic	Aim	MS	Participants	Date
A co-operation model – The implementation of the Card in a multi-level administrative system	The focus group aimed to understand the functioning of the cooperation model in Belgium and potential transferability in other Member States.	BE	Federal Public Service (FPS) Social Security AViQ - Walloon Region VAPH – Flemish Region DSL - German-Speaking Community Crossroads Bank for Social Security MultiPost	15 May 2020
Management of service providers	The focus group aimed to explore the different mechanisms are in place at the national level for the management of service providers.	BE, FI, MT, RO, SI	AviQ, Walloon Region (BE) DCNO BE DCNO FI DCNO MT DCNO RO DCNO SI	20 May 2020
Nudging service providers: the public transport case (authorities responsible for managing transport operators)	The focus group aimed to investigate why service providers did not choose to join the Card's system in all participating Member States, and how they can be drawn into it.	BE, CY, SI ⁴⁰¹	Flemish Minister of Mobility and public works (BE) Ministry of Transport, Communications and Works (CY) Ministry of infrastructure of the Republic of Slovenia, Division for sustainable mobility and transport policy (SI)	26 May 2020
Nudging service providers: the public transport case (transport operators)	The focus group aimed to investigate why service providers did not choose to join the Card's system in all participating Member States, and how they can be drawn into it.	FI, RO, SI ⁴⁰²	Finnair (FI) Tampere Regional Transport - Tampereen seudun joukkoliikenne Nysse (FI) Căile Ferate Române - CFR Calatori (RO) Slovenian Railways (SI) Arriva Group Slovenia (SI) FRAport Slovenia - Ljubljana Airport (SI)	27 May 2020
Bottom-up stakeholder consultation	The focus group aimed to investigate how the consultations between the managing authority, civil	CY	Cypriot Confederation of the Organisations of persons with disabilities Department for the Inclusion of Persons with Disabilities	

⁴⁰¹ In CY, there are only private transport operators that are not in the scope of the case study. However, in CY the private transport sector was covered by the Card and the authority competent in the transport sector expressed the willingness to participate in the focus group. Hence, it has been involved, providing useful information to further enrich the understanding of specific national contexts of reference.

⁴⁰² In SI, there are also private transport operators that are not in the scope of the case study. However, since some of them expressed their willingness to participate in the focus group, they have been involved, providing useful information to further enrich the understanding of specific national contexts of reference.

Topic	Aim	MS	Participants	Date
	society organisations, and service providers influenced the Card implementation.			
A case of administrative complexity - The prior notice obligation	The focus group aimed to investigate how the information on service providers in RO and abroad was retrieved and then integrated in the website.	RO	DCNO RO Two persons with disabilities without the Card Two persons with disabilities with the Card	

The discussions focused on stakeholders' views on the specific topic of the consultation. Takeaways notes have been subsequently circulated for validation among participants.

16.3. Results

16.3.1. Interviews

The main results from the interviews at the national level can be summarised as follows:

- **Definition of disability:** the introduction of the Card did not imply any change to the definition of disability as it was already defined according to national legislation;
- **Issuing authority:** in most Member States, the issuing authority is the DCNO (CY, EE⁴⁰³, FI, MT, RO, SI). In BE the Card is issued by all five authorities involved in its management, including the DCNO and the four regional institutions⁴⁰⁴. In IT, where the Card has not been issued yet, the issuing authority is expected to be the National Institute for Social Security (INPS).
- **Sectors in scope:** the culture and leisure sectors are covered in all Member States. The sport sector is covered in all Member States except for MT. The coverage of the transport sector is more heterogenous across Member States: private transport is covered in CY, FI and MT while public transport is covered in FI;
- **Recruiting/managing contacts with service providers:** in all the eight Member States, DCNOs are engaged in recruiting service providers and managing contacts with them (BE, CY, EE, FI, MT, RO, SI⁴⁰⁵). The recruiting process is sometimes based on cooperation between the DCNO and the competent Ministries in the areas of culture, leisure, sport and transport (BE, CY), Ministry of social affairs (SI) or local NGOs (FI);
- **Production:** the production of the Card is managed by the DCNO only in CY, while it is outsourced to a private entity in BE, FI, MT, RO and SI. In EE and IT, the Card has not been issued yet. In some Member States, card production is demand-based and in others it is pre-decided based on economies of scale/cost considerations.

⁴⁰³ Even though the Card has not been issued yet in EE, the issuing authority is expected to be the DCNO.

⁴⁰⁴ The Federal Ministry is the DCNO and plays the role of a coordinator between all authorities involved in the management of the Card.

⁴⁰⁵ In IT service providers have not been involved yet.

Pre-printed Cards are later personalised with information on the beneficiaries once the applications are accepted;

- **Delivery:** in most Member States, the entity responsible for the production of the Card is also in charge of its delivery (BE, CY, RO, SI). Except for EE and FI, the delivery is - or is expected to be - free of charge;
- **National website:** all Member States set up a national website of the Card, except for EE⁴⁰⁶. In most Member States, the establishment of the website was outsourced either to a private entity (CY, MT, RO) or to a civil society organisation (SI). In FI and IT, the website was developed in-house;
- **Cooperation between relevant authorities:** in some Member States the management of the Card is at the national level (CY, EE, FI, IT, MT, SI), in others it is based on a multi-level governance scheme (BE, RO);
- **Consultations with persons with disabilities/civil society organisations:** in all Member States, consultations with stakeholders not directly involved in the Card management were carried out to design the Card systems at the national level. Consultations with persons with disabilities aimed to identify their key needs and define the packages of services and benefits to be covered (CY, FI, MT, SI). Consultations with civil society organisations aimed to identify the most suitable authority to be responsible for issuing and producing the Card (IT), to define eligibility criteria for receiving the Card (CY, IT, SI), to raise service providers' awareness of the needs of persons with disabilities (BE) and to define the package of benefits covered by the Card (BE, FI, CY, IT, MT);
- **National databases:** most Member States already have a database with information on persons with disabilities: it was either already established (BE, IT, RO) or created *ad hoc* during the pilot project (CY, EE, SI). Five Member States established a database of beneficiaries (BE, CY, MT, RO, SI) and, with the exception of RO, all Member States established a service providers database. EE and IT did not establish a database of beneficiaries since the Card has not been issued yet. Finally, in IT, neither the database with information on service providers was established since these have not been recruited yet;
- **Awareness-raising activities:** all Member States organised awareness-raising activities and communication campaigns. According to some of the interviewees, the involvement of both service providers and persons with disabilities in the consultation and awareness raising activities contributed to increasing the sensitivity of service providers to the needs of persons with disabilities;
- **Monitoring activities:** monitoring and evaluation activities on the implementation of the Card at the national level were performed in BE, CY, FI, RO and SI.

16.3.2. Online survey: first round

Legal and policy background

Table 61⁴⁰⁷ includes the **definition of disability** for each Member State⁴⁰⁸.

⁴⁰⁶ The Estonian Chamber of Disabled Persons established a website (<https://www.epikoda.ee/soodustused>) in 2017. However, this website is not the EU Disability Card official website in the country and the information available is not up to date.

⁴⁰⁷ Information included in this table is only based on survey results; thus, it might slightly differ from that provided in the core Final Report, which was triangulated across multiple sources (both desk and field research).

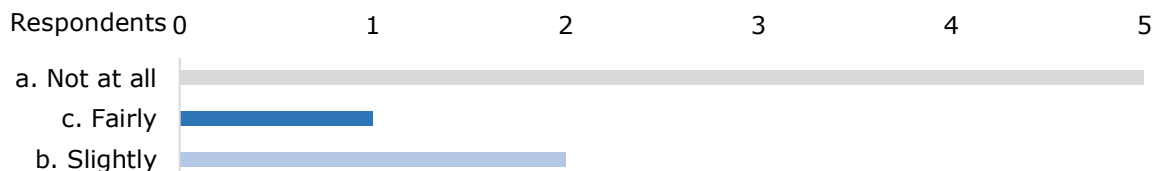
⁴⁰⁸ Survey question 17. BE: DCNO, 1 PA. CY: DCNO. EE: DCNO. FI: 1 PA. IT: DCNO. MT: DCNO. RO: DCNO. SI: DCNO.

Table 61 - Definition of disability

MS	Definition of disability
BE	<p>There is no uniform definition of disability at the national level:</p> <p>Flemish Region: disability is being defined as any serious and durable loss of possibility to participate in society driven by physical, sensorial, mental and psychological deficiencies.</p> <p>German speaking Community: it is a physical health problem, chronic illness, mental deficiency, result of an accident hindering personal income, education, employment, social life and well-being of health.</p>
CY	<p>Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others and which are certified by the Evaluation Centres of the Department for Social Inclusion of Persons with Disabilities, as moderate, severe or complete disability.</p>
EE	<p>Disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person which in conjunction with different relational and environmental restrictions prevents participation in social life on equal bases with the others. [RT I 2007, 71, 437 - entry into force 01.10.2008]. Based on this Act, the severe, profound or moderate degree of disability of children of up to 16 years of age and persons of the retirement age is established proceeding from the need for personal assistance, guidance or supervision.</p> <p>For the purposes of this subsection, there are the following degrees of severity of disabilities:</p> <ul style="list-style-type: none"> • Profound disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs constant personal assistance, guidance or supervision twenty-four hours a day; • Severe disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs personal assistance, guidance or supervision in every 24-hour period; • Moderate disability is the loss of or an abnormality in an anatomical, physiological or mental structure or function of a person as a result of which the person needs regular personal assistance or guidance outside his or her residence at least once a week.
FI	<p>The Act on Disability Services defines a person with disability as a person who, because of his disability or illness, has special long-term difficulties in managing the normal functions of everyday life.</p>
IT	<p>UN Convention on the Rights of Persons with Disabilities (CRPD).</p>
MT	<p>Disability is defined as a long-term physical, mental, intellectual or sensory impairment which in interaction with various barriers may hinder one's full and effective participation in society on an equal basis with others (Chapter 413 of the Laws of Malta, the Equal Opportunities (Persons with Disability) Act).</p>
RO	<p>According to Law no. 448/2006 on the protection and promotion of the rights of persons with disabilities, disability represents the generic term for impairments, deficiencies, activity limitations and participation restrictions, defined according to the International Classification of Functioning, Disability and Health, adopted and approved by the World Health Organisation, and which reveals the negative aspect of the individual-context interaction.</p>
SI	<p>Disability is recognised by means of a decision issued by an authority specified by law and based on the opinion of an expert body. An individual may exercise the rights defined in a regulation pursuant to a final legal decision. Slovenian legislation contains several differing definitions of disability produced at different times:</p> <p>The first five definitions remain more or less at the "medical model" level oriented towards resolving the issue of an individual's employment opportunities or socio-economic position</p> <p>The latest legislative material (2002, 2010) introduced definitions derived from the human rights model to address the activities of persons with disability and their organisations and the active role of the state in the creation and adoption of the Convention on the Rights of Persons with Disabilities (CRPD), which led to its early ratification in 2008.</p> <p>All definitions have a series of common elements:</p> <p>The requirement for the individual's health impairment to be defined in terms of degree or duration, or merely expressed as a physical or mental disability</p> <p>The requirement for the disability to be established by means of a procedure defined by law</p> <p>The requirement for the health impairment to be placed in relation to an external event (e.g. disability may be the result of military or other duties undertaken for the defence and security of Slovenia or the result of circumstances associated with involvement in education or the labour market).</p>

In all Member States, the adoption of the Card did not entail any **change to the pre-existing, relevant legislation**⁴⁰⁹. The existing definitions of disability across Member States are not harmonised overall⁴¹⁰.

Figure 37 - Extent to which the definition of disability is harmonised across Member States

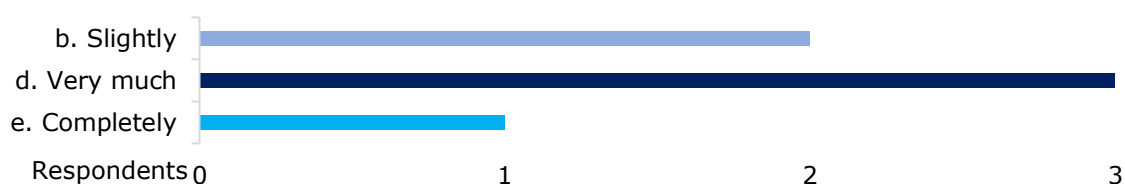


The existing **differences in national legal and administrative systems** may represent an obstacle to the effective implementation of the Card across Member States⁴¹¹ and to the mobility of persons with disabilities⁴¹².

Figure 38 – Extent to which national differences hinder an effective implementation of the Card



Figure 39 - Extent to which national differences hinder the mobility of persons with disabilities



EE, MT and RO⁴¹³ have a **National Disability Card**⁴¹⁴, which covers culture, leisure, sport and public transport sectors, while the other Member States do not have one.

It seems that there is some confusion about the existence of a National Disability Card since stakeholders from the same Member States provide apparently contradicting information.

⁴⁰⁹ Survey question 18. BE: DCNO, 6 CSO, 3 PA. CY: DCNO, 1 PA, AE, 5 CSO. EE: DCNO, 3 CSO. FI: DCNO, 4 PA, 10 CSO. IT: DCNO, 3 CSO. MT: DCNO. RO: DCNO, 24 PA, 3 CSO.

⁴¹⁰ Survey question 7 – EU level survey. 8 EU CSOs.

⁴¹¹ Survey question 6 – EU level survey. 6 EU CSOs.

⁴¹² Survey question 9 – EU level survey. 6 EU CSOs.

⁴¹³ This Annex reported the responses provided by the DCNOs through the online survey. However, during the interview, the DCNO of RO confirmed that a National Disability Card exists also in RO. Public authorities and civil society organisations did not report the same information on the existence of the National Disability Card. 2 CSOs and 9 PAs reported that in RO there is a National Disability Card, while the opposite is stated by 1 CSO and 12 PAs.

⁴¹⁴ Survey question 51. BE: DCNO, 3PA, 4CSO CY: DCNO, 6CSO. FI: DCNO, 2PA, 10 CSO. IT: DCNO, 2 CSO. MT: CSO. RO: DCNO, 12 PA, CSO. SI: DCNO.

For example, the DCNOs from BE, CY, FI, IT reported that there is no National Disability Card, and the DCNO from MT stated that there is. However, the opposite is reported by Public Authorities and civil society organisations in BE, CY, MT. This may be explained by the fact that Public Authorities and civil society organisations made some confusion between the National Disability Card and benefits otherwise provided at the national level in the field of culture, leisure, sport and public transport sectors, hence replying yes, even though a physical National Disability Card does not exist.

Stakeholders from EE, MT and RO reported that the National Disability Card⁴¹⁵ provides free entrance and price reduction in all four sectors. In EE, accessories, such as audio guides and braille guides, are provided to persons holding the National Disability Card.

Table 62 - Benefits provided by National Disability Cards in EE, MT, RO

	MS	Free entrance	Price reduction	Service
Culture ⁴¹⁶	EE	✓	✓	✓
	MT	✓	✓	✗
	RO	✓	✓	✗
Leisure ⁴¹⁷	EE	✓	✓	✓
	MT	✓	✓	✗
	RO	✓	✓	✗
Sport ⁴¹⁸	EE	✓	✓	✓
	MT	✓	✓	✗
	RO	✓	✓	✗
Private transport ⁴¹⁹	EE	✓	✓	✓
	MT	✓	✓	✗
	RO	✓	✓	✓
Public transport ⁴²⁰	EE	✓	✓	✓
	MT	✓	✓	✗
	RO	✓	✓	✗

In the other Member States, there is a mix between the types of benefits provided and the sectors covered (Table 63).

Table 63 - National benefits provided to persons with disabilities

	MS	Free entrance	Price reduction	Service
Culture ⁴²¹	BE	✓	✓	✓
	CY	✓	✓	✗
	FI	✗	✗	✓
	SI	✓	✓	✓
Leisure ⁴²²	BE	✓	✓	✓
	CY	✓	✓	✓
	FI	✗	✗	✓
	SI	✗	✓	✓
	BE	✓	✓	✓

⁴¹⁵ Survey question 52.

⁴¹⁶ Free entrance - EE: DCNO, 2 CSO. MT: DCNO, 2 CSO, 2 SP. RO: 8 PA, 1 CSO, 1 SP. Price reduction: EE: DCNO, 3 SP, 3 CSO. MT: 1 SP. RO: 3 PA, 2 SP, 1 CSO. Service - EE: DCNO, 1 CSO.

⁴¹⁷ Free entrance: EE (2 CSO), MT (DCNO, CSO), RO (5 PA, CSO, SP). Price reduction: EE (DCNO, 3 CSO, 3SP), MT (SP), RO (PA, CSO, SP). Service: EE (DCNO, CSO).

⁴¹⁸ Free entrance: EE (DCNO, 2 CSO), MT (1CSO, 1SP), RO (6 PA, 1CSO, 1SP). Price reduction: EE (DCNO, 2 CSO, 3 SP), MT (DCNO), RO (2PA, 1CSO).

⁴¹⁹ Free entrance: EE (1SP), MT (1CSO), RO (3 PA, 1CSO). Price reduction: EE (3 CSO), MT (1SP), RO (1SP). Service: EE (1CSO), RO (1PA).

⁴²⁰ Free entrance: EE (DCNO, 2 CSO, SP), MT (1CSO, 1SP), RO (3 PA). Price reduction: EE (DCNO, 2CSO, 2 SP), MT (DCNO, 1CSO), RO (1PA, 1SP). Service: EE (DCNO, 1CSO).

⁴²¹ Free entrance: BE (1 CSO, 1 SP), CY (2 CSO, 2 SP), SI (1 CSO). Price reduction: BE (2 CSO, 1 SP), CY (PA), SI (DCNO). Service: BE (1 CSO, 1 SP), FI (1 CSO), SI (1 CSO).

⁴²² Free entrance: BE (1 CSO, 1 SP), CY (1 CSO, 1 PA, 1 SP). Price reduction: BE (2 CSO, SP), CY (1 PA), SI (1 CSO).

	MS	Free entrance	Price reduction	Service
Sport ⁴²³	CY	✓	×	×
	FI	×	×	✓
	SI	✓	✓	✓
Private transport ⁴²⁴	BE	✓	✓	✓
	CY	×	✓	×
	FI	×	×	✓
	SI	×	✓	×
Public transport ⁴²⁵	BE	✓	✓	✓
	CY	✓	✓	×
	FI	×	×	✓
	SI	✓	✓	×

The type of benefits provided by the service providers in different sectors replying to the survey are summarised in Table 64⁴²⁶. Service providers from CY, EE, FI and RO provide benefits to the assistants of persons with disabilities such as price reduction free entrance in CY, EE, FI and MT⁴²⁷.

Table 64 - Average price reduction offered to National Disability Cardholders and assistant

MS	Culture	Leisure	Sport	Private transport	Public transport
CY ⁴²⁸	Free entrance Assistant: Free	-	Free entrance Assistant: Free	-	-
EE ⁴²⁹	-	-	-	-	0-24% 50-74% 75-99% Assistant: Free
FI ⁴³⁰	-	0-24% (Free Assistant)	-	-	-
MT ⁴³¹	25-49% Assistant: Free and 25-49%	-	-	-	-
RO ⁴³²	-	-	50-74% Assistant: Free and 25-49%	-	-

EE and MT reported no differences between the benefits offered through the National Disability Card and the European Disability Card⁴³³. In EE, most of the service providers participating in the National Disability Card are ready to offer the same benefits once the EU Disability Card will be issued, and in MT, the EU Disability Card has replaced the National Disability Card. For the remaining Member States where there is no National Disability Card (BE, CY, FI, IT, RO, SI), the national benefits may correspond to those provided by the EU Disability Card (FI, IT, RO and SI) or be different (BE and CY). More

⁴²³ Free entrance: BE (1 CSO, 1 SP), CY (1 CSO, 2 SP), SI (DCNO). Price reduction: BE (2CSO, 1 SP), SI (1 CSO). Service: BE (1 CSO, 1 SP), FI (1 CSO), SI (DCNO).

⁴²⁴ Free entrance: BE (1 SP). Price reduction: BE (1 CSO, 1 SP), CY (1 CSO), SI (1 CSO). Service: BE (1 SP), FI (1 CSO).

⁴²⁵ Free entrance: BE (1 CSO, 1SP), CY (1SP), SI (1CSO). Price reduction: BE (1 CSO, 1 SP), CY (1 CSO), SI (1 CSO). Service: BE (1 SP), FI (1 CSO).

⁴²⁶ Survey question 53. Survey question 54.

⁴²⁷ Survey question 55. 0- 24%: BE (SP), EE (2SP). 25-49%: MT (SP). 100% (Free entrance): CY (3SP), EE (SP), FI (2 SP), MT (SP).

⁴²⁸ Free entrance: SP from culture (2) and sport (1) sector.

⁴²⁹ 0-24%: 2 SP from public transport sector. One SP from public transport report that all range of discount.

⁴³⁰ 0-24%: 1 SP from culture sector

⁴³¹ 25-49%: 1 SP from culture sector.

⁴³² 50-74%: 1 SP from sport sector.

⁴³³ Survey question 64. BE: PA, 5 CSO. CY: 2 CSO. EE: DCNO, 1 CSO. FI: 3 CSO. IT: DCNO (it is assumed that the answer corresponds to the expected benefits of the EU Disability Card). MT: DCNO, 2 CSO. RO: 7 PA, 1 CSO. SI 1 CSO.

specifically, in BE, some benefits covered through the EU Disability Card correspond to those provided at the national level also to persons with disabilities who do not have the European Disability Card (e.g. reduced fares on public transport), whereas some benefits are not covered by the EU Disability Card (e.g. preferential parking)⁴³⁴. In FI, the main advantage of the EU Disability Card is that it provides free entrance for the assistants of persons with disabilities, while national card benefits to persons with disabilities do not provide this coverage. In RO⁴³⁵, the benefits covered by the EU Disability Card correspond only to those service providers granting benefits in the field of access to culture, leisure and sport, hence widening the benefits provided by the national legislations (Law no. 448/2006) to persons with light and medium degree of disability. In SI, persons with disabilities who are members of civil society organisations representing them can use the association's Card membership as proof of disability to claim certain benefits.

Organisational set-up

The **management of the Card**⁴³⁶ is at the national level in all Member States (CY, EE, FI, IT, MT, RO, SI), except for BE where it is under both the federal and the regional authorities.

The **authority responsible for issuing the Card**⁴³⁷ is the DCNO in CY, MT and RO⁴³⁸ while it is a public authority in BE, FI and SI. In EE and IT, it is a public authority⁴³⁹.

Table 65 - Issuing Authorities

MS	Issuing authority ⁴⁴⁰
BE	<ul style="list-style-type: none"> • Federal Public Service (FPS) Social Security • Agence pour une Vie de Qualité (AViQ) • Service public francophone Bruxellois (Service Phare) • Vlaams Agentschap voor Personen met een Handicap (VAPH) • Dienststelle für Selbstbestimmtes Leben (DSL).
CY	Department for Social Inclusion for Persons with Disabilities
EE	Estonian Social Insurance Board ⁴⁴¹
FI	Ministry of Social affairs and Health ⁴⁴²
IT	National Insurance Board ⁴⁴³
MT	Commission for the Rights of Persons with Disability (CRPD)
RO	National Authority for Persons with Disabilities (NADP)
SI	Ministry of Public Administration

⁴³⁴ For more details on benefits provided to persons with disability in BE, see at: <https://handicap.belgium.be/fr/nos-services/index.htm>

⁴³⁵ Survey question 65. RO: DCNO, 7 PA, 1 CSO.

⁴³⁶ Survey question 14. BE: DCNO, 3 PA. CY: DCNO, PA, AE. EE: DCNO. FI: DCNO, PA. IT: DCNO. MT: DCNO. RO: DCNO, 19 PA.

⁴³⁷ Survey question 27. BE: DCNO, 3 PA, 6 CSO. CY: DCNO, AE, PA, 6 CSO. EE: DCNO, CSO. FI: DCNO, PA, 6 PA. IT: DCNO, CSO. MT: DCNO. RO: DCNO, 20 PA, 3 CSO.

⁴³⁸ Eight Public Authorities replied that also the General Directorate of Social Assistance and Child Protection (DGASPC) are responsible for issuing the Card in RO. The information was triangulated with the information provided during the interview with the DCNO. The Card is issued by the DCNO, however the DGASPC actually hand them to the recipients, hence from here the answer provided by the Public Authorities.

⁴³⁹ Since the Card has not been issued in these Member States, these responses refer to expected issuing authorities once the Card is to be issued.

⁴⁴⁰ Survey question 28. BE: DCNO, 3 PA, 5 CSO. CY: DCNO, PA, 7 CSO. EE: DCNO. FI: DCNO, 9 CSO. IT: DCNO. MT: DCNO, CSO. RO: DCNO, 3 CSO, 19 PA.

⁴⁴¹ Even though the Card has not been issued yet, the DCNO provided the name of the authority expected to issue the Card.

⁴⁴² Nine CSOs from FI reported that the issuing authority is Kela (the Social Insurance Institution of Finland), however this information was triangulated through the interview with the DCNO in FI and it has been clarified that it is the DCNO that issued the Card.

⁴⁴³ Even though the Card has not been issued yet, it is the expected body responsible for issuing the Card.

Table 66 includes the number of **Cards issued** per Member State since the launch of the pilot⁴⁴⁴.

Table 66 – Number of Cards issued

MS	2015	2016	2017	2018	Total
BE	0	0	7,880	24,955	32,835
CY	0	0	3	950	953
EE	0	0	0	0	0
FI	0	0	0	5,157	5,157
IT	0	0	0	0	0
MT	0	0	1,500	2,400	3,900
RO ⁴⁴⁵	0	0	6,381	3,717	10,098
SI ⁴⁴⁶	-	-	-	-	-

The **recruitment of service providers**⁴⁴⁷ is carried out by the DCNO in CY, FI, MT and RO, by public authorities in BE and IT and by a civil society organisation in EE. The same authority responsible for the recruitment of service providers is also in charge of **managing contacts** with them⁴⁴⁸ in BE, CY, FI, IT, MT and RO.

Table 67 – Authorities recruiting and managing contacts with service providers

MS	Authority Recruiting	Authority managing contacts
BE	Public Authority	Public Authority
CY	DCNO	DCNO
EE	Civil society organisation	-
FI	DCNO	DCNO
MT	DCNO	DCNO
RO	DCNO	DCNO

As far as the **recruitment of service providers**⁴⁴⁹ is concerned, the process differs across Member States, and information provided by the DCNOs and service providers is not always coherent. In BE, the DCNO did not provide any specific information on the recruitment process, and only reported that the service providers willing to participate in the Card can register online on the Card national website. On the other hand, a Public Authority from Walloon Region reported that the recruiting occurs through individual contacts such as phone, e-mail, mail, and promotion actions. Finally, PAs and service providers from the German speaking community reported that it occurs through an official call for interests. In EE, the DCNO did not provide any specific information on the recruitment process, however service providers reported that recruitment occurs through individual contacts such as phone calls, individual visits and e-mails, but also through public procurement. In IT, the DCNOs report that service providers are recruited through official calls for interests, however they have not been recruited yet, hence this information seems to refer to the expected recruitment process. In FI, MT and RO, the DCNOs reported that the process functions through individual calls, while service providers and public authorities reported that the recruiting occurs also through official calls for interests, and in CY also public procurement. Such discrepancies may suggest that there is low awareness among service providers on the functioning on the Card and the mechanisms to participate in it.

⁴⁴⁴ Survey question 29. BE: DCNO. CY: DCNO. FI: DCNO. MT: DCNO. RO: DCNO.

⁴⁴⁵ PAs replying to the survey each provided a different figure. Contradictory information was triangulated with the official data provided by the DCNO.

⁴⁴⁶ No information provided for SI.

⁴⁴⁷ Survey question 42. No information provided for SI. No information for IT since the service providers have not been recruited yet. BE: DCNO, 3 PAs, SP. CY: DCNO, 2 SPs, AE. EE: DCNO, 3 SPs. FI: DCNO, PA. MT: DCNO, 4 SPs.

⁴⁴⁸ Survey question 49. No information provided for SI. BE: DCNO. CY: DCNO, SP. EE: 3SPs. FI: DCNO, 2SPs. MT: DCNO, 3 PAs. RO: DCNO, 7 PAs, SP.

⁴⁴⁹ Survey question 43. BE: DCNO, 3 PAs, SP. CY: DCNO, 3 SPs. EE: DCNO, 3 SPs. FI: DCNO, 2 SPs. MT: DCNO, 4 SPs. RO: DCNO, 11 PAs, 2 SPs.

The most common way of contacting service providers are e-mails and meetings between DCNOs, Public Authorities and service providers, followed by phone calls and Skype conferences. RO is the only Member State where standard mail is also being used⁴⁵⁰.

Table 68 - Means of communication with service providers

MS	Emails	In person meetings	Phone/skype conferences
BE ⁴⁵¹	✓	✓	✓
CY ⁴⁵²	✓	✓	✗
EE ⁴⁵³	✓	✓	✓
FI ⁴⁵⁴	✓	✓	✓
MT ⁴⁵⁵	✓	✓	✓
RO ⁴⁵⁶	✓	✓	✓

Table 69 summarises the **number of service providers** recruited across Member States⁴⁵⁷.

Table 69 – Number of service providers⁴⁵⁸

MS	2015	2016	2017	2018	Total
BE	0	0	150	250	400
CY	0	16	0	0	16
EE	-	-	-	-	-
FI	0	0	0	200	200
IT	0	0	0	0	0
MT	0	0	17	2	19
RO ⁴⁵⁹	-	-	-	238	238
SI	-	-	-	-	-

The appropriateness of the number of service providers recruited at the national level is considered differently across Member States and across categories of stakeholders⁴⁶⁰.

⁴⁵⁰ Survey question 50. No information provided for SI.

⁴⁵¹ Emails: DCNO, 4 PAs. In person meetings: 2 PAs. Phone/skype conferences: 2 PAs.

⁴⁵² Emails: PA, 3 SPs. In person meetings: PA, 2 SPs.

⁴⁵³ Emails: DCNO, 3 SPs. In person meetings: DCNO, 3 SPs. Phone/skype conferences: DCNO, 3 SPs.

⁴⁵⁴ Emails: DCNO, 2S SPs. In person meetings: DCNO. Phone/skype conferences: DCNO, SP.

⁴⁵⁵ Emails: DCNO, 5 SPs. In person meetings: DCNO, 2 SPs. Phone/skype conferences: DCNO, 3SPs.

⁴⁵⁶ Emails: DCNO, 6 PAs, 2 SPs. In person meetings: DCNO, 4 PAs, SP. Phone/skype conferences: PA. Mail:

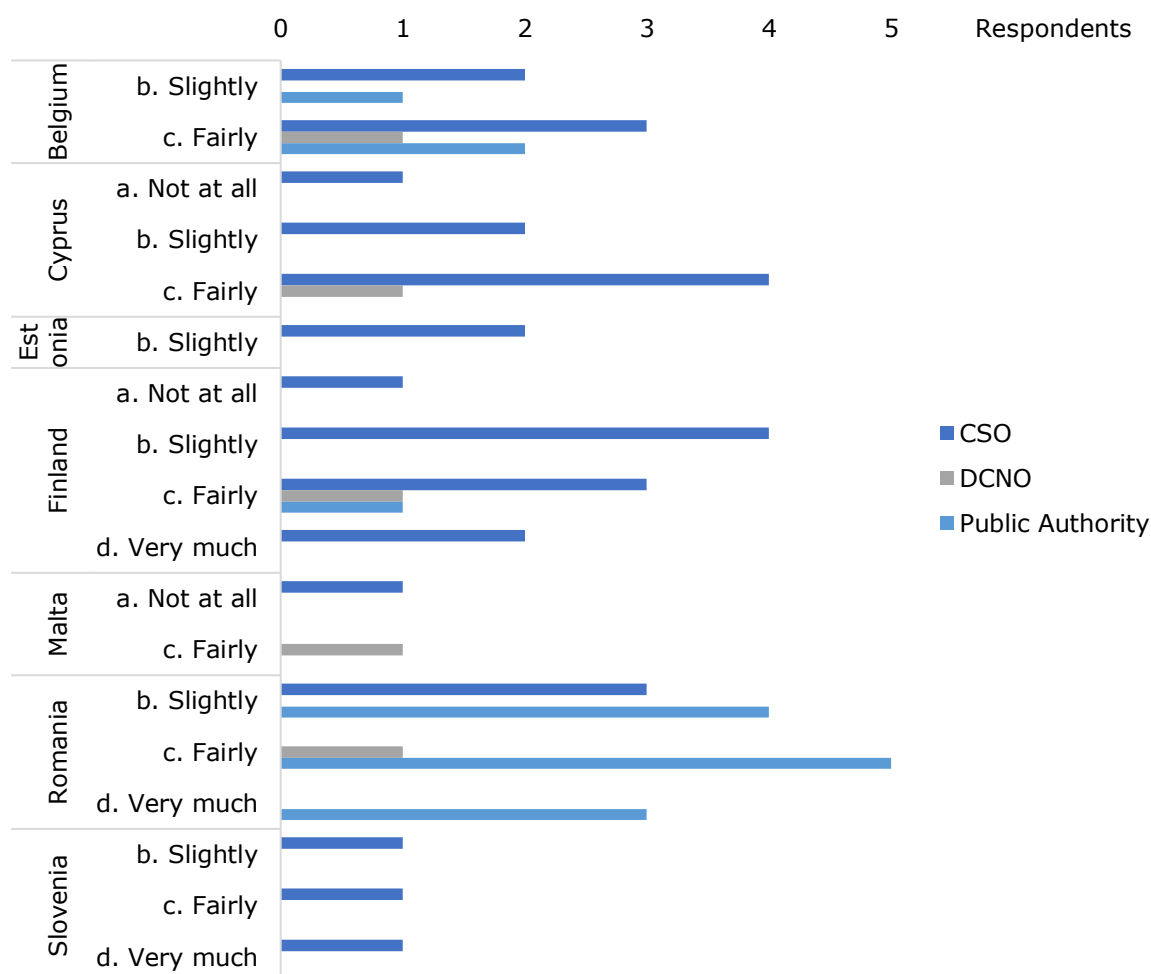
⁴⁵⁷ Survey question 44. No information provided for EE and SI. BE: DCNO. CY: DCNO. FI: DCNO. MT: DCNO. RO: DCNO.

⁴⁵⁸ Data were provided by the DCNOs. In some cases, these data are not confirmed by information provided by other stakeholder categories through the online survey. Any inconsistency is detailed in footnote related to specific Member States.

⁴⁵⁹ Information provided only for 2018.

⁴⁶⁰ Survey question 45. No information provided for IT.

Figure 40 – Extent to which the number of service providers recruited cover the needs of persons with disabilities per Member State and categories of stakeholders



The **funding of the Card** is public at the national level in all Member States⁴⁶¹. Specifically⁴⁶², in BE an agreement has been signed between the relevant ministries to ensure the public funding of the Card and to define their respective contribution to the Card project. In FI, the Funding Centre for Social Welfare and Health Organisations (STEA) provided funding for the establishment of the Card. In RO, the National Authority for Persons with Disabilities (NADP) was responsible for the costs of the first 50,000 Cards printed until 2020.

Except in EE, the **Card national websites**⁴⁶³ were established in all Member States. The **establishment**⁴⁶⁴ was outsourced to a private entity in BE⁴⁶⁵, CY, MT, RO⁴⁶⁶, while in FI

⁴⁶¹ Survey question 15. BE: DCNO, 3 PAs. CY: DCNO, 1 PA, 1 AE. EE: DCNO. FI: DCNO, 3 PAs. IT: DCNO. MT: DCNO. RO: DCNO, 16 PAs.

⁴⁶² Survey question 16. No information provided for CY, EE, IT, SI. BE: DCNO, 2 PAs. FI: DCNO, 1 PA. MT: DCNO. RO: 19 PAs.

⁴⁶³ Survey question 85. BE: DCNO, 3 PAs, 3 CSOs. CY: DCNO, 4 CSOs. EE: DCNO, 3 CSOs. FI: DCNO, 2 PAs, 8 CSOs. IT: DCNO, CSO. MT: DCNO. RO: DCNO, 2 CSOs, 16 PAs. SI: CSO.

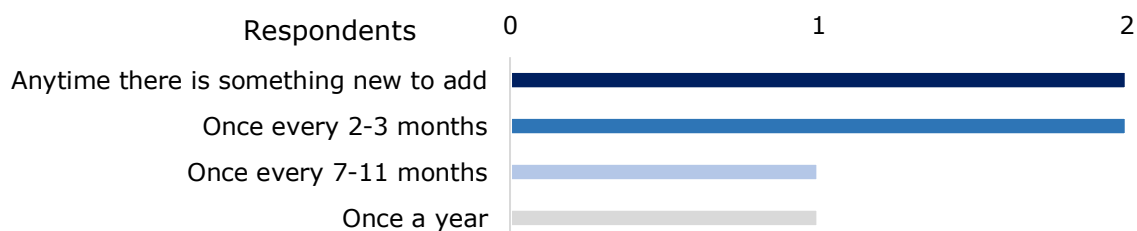
⁴⁶⁴ Survey question 86. No information provided for EE. BE: DCNO, 3 CSOs, 2 PAs. CY: DCNO. FI: 7 CSOs. MT: DCNO. RO: DCNO, PA, CSO.

⁴⁶⁵ The website was established through a collaboration between the DCNO and a private entity. The accessibility of the website was developed by a private entity – AnySurfer – that was subcontracted by the DCNO.

⁴⁶⁶ The DCNO reported that the establishment was subcontracted to a private entity, however nine public authorities reported that the establishment was done inhouse. From interviews with the DCNO it was clarified that the website of

and SI to a civil society organisation, and in IT it was done in-house. Overall, the website is perceived to be **updated regularly**⁴⁶⁷ by stakeholders, except in EE and IT. The authorities in charge of the website **updating** are the DCNOs in CY, FI, MT and relevant public authorities in BE and RO⁴⁶⁸. The update is carried out on a regular basis in most Member States (BE, CY, FI, IT, MT, RO), and notably: any time there is something new to be added (CY and FI), every two to three months (BE and MT), every seven to eleven months (RO), once a year (IT)⁴⁶⁹.

Figure 41 – Website updating



Consultations with persons with disabilities⁴⁷⁰ to define the package of benefits to be covered with the Card were carried out in CY, FI, MT, SI, and not in BE, IT and RO⁴⁷¹. The DCNO is the **body responsible for contacting persons**⁴⁷² with disabilities in CY, FI, MT and SI. In Member State where persons with disabilities are contacted directly, focus groups, meetings, online surveys and phone interviews were the main **tools used for consultations**⁴⁷³.

Table 70 – Tools used for consultations with person with disabilities

MS	Focus groups	Meetings/ presentations	Online surveys	Phone surveys
CY ⁴⁷⁴	✓	✓	✓	✗
FI ⁴⁷⁵	✓	✓	✓	✓
MT ⁴⁷⁶	✓	✓	✗	✗
SI ⁴⁷⁷	✓	✓	✓	✓

the Card was subcontracted to a private entity, however, each DGASPC has a special section on the programme on their own websites and this updating sometimes is done in house.

⁴⁶⁷ Survey question 87. BE: DCNO, 2 PAs, SP, CSOs. CY: DCNO, 2 SPs, 3 CSOs. EE: 3 CSOs. FI: DCNO, SP, 8 CSOs. IT: DCNO. MT: DCNO, 3 SPs. RO: DCNO, 16PAs, SP, CSO. SI: 2 CSOs.

⁴⁶⁸ Survey question 88. BE: DCNO, 2 PAs. CY: DCNO. FI: DCNO, PA. MT: DCNO. RO: DCNO, 10 PAs.

⁴⁶⁹ Survey question 89. BE: DCNO. CY: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: DCNO, 2PAs.

⁴⁷⁰ Survey question 73. BE: DCNO, 2 PAs, 2 CSOs. CY: DCNO, 5 CSOs, AE. EE: 2 CSOs. FI: DCNO, PA, 6 CSOs. IT: DCNO, 2 CSOs. MT: DCNO, CSO. RO: DCNO, 8 PAs, CSO. DPs: 21.

⁴⁷¹ As regards EE, the DCNO did not answer to this question. Two CSOs declared that no consultations with persons with disabilities were carried out, while one CSO reported the opposite. In RO, the DCNO, eight PAs and one CSO reported that consultations with persons with disabilities were not carried out, while seven PAs reported the opposite. The interview with the DCNO confirms the consultations were not carried out, but they were conducted only with CSOs. For this reason, it was considered that the seven PAs refer to the consultation with CSOs representing persons with disabilities.

⁴⁷² Survey question 74. CY: DCNO, 3 PAs. FI: DCNO, PA, CSO. MT: DCNO. SI: DCNO, 2 Pas. DPs: 15.

⁴⁷³ Survey question 75. DP: 17s.

⁴⁷⁴ Focus group: 3CSOs. Meetings/presentation: DCNO, CSO. Online survey: CSO.

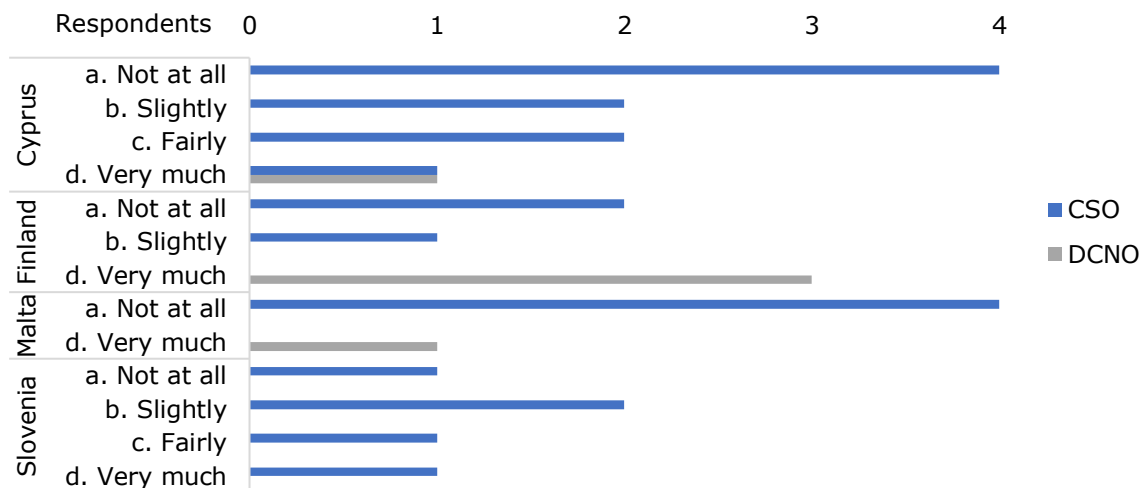
⁴⁷⁵ Focus group: DCNO, CSO. Meetings/presentation: DCNO. Online survey: DCNO, CSO. Phone surveys: CSO.

⁴⁷⁶ Focus group: CSO. Meetings/presentation: DCNO.

⁴⁷⁷ Focus group: DCNO. Meetings/presentation: CSO. Online survey: CSO. Phone surveys: CSO.

The appropriateness of the consultation tools as regards their capacity to actually reach expected targets is considered differently across Member States and across categories of stakeholders⁴⁷⁸.

Figure 42 - Extent to which the ‘consultation tools’ used reached the target per stakeholders



As far as the **number of persons reached by the tools**⁴⁷⁹ is concerned, most of CSOs and Public Authorities are not aware of this information. In CY a CSO responded that the consultation processes were carried out by the DCNO to map the situation relative to disability and respective benefits provided in other Member States not participating in the Card in order to understand if national persons with disabilities would need the Card. To this aim, 128 people were surveyed in CY⁴⁸⁰. In MT, a conference for the launch of the project was organised and a considerable number of persons with disabilities attended it. Moreover, the DCNO is continually consulting organisations run by persons with disabilities themselves, hence their feedbacks on the Card and related initiatives are constantly forthcoming. The DCNO from FI reported that 500 persons were consulted.

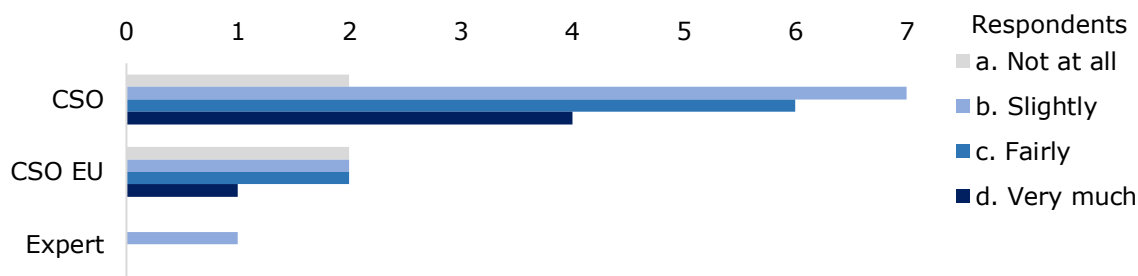
Taking into consideration the opinion of the persons with disabilities consulted, CSOs reported that overall their opinions were fairly well considered (**Error! Reference source not found.**).

⁴⁷⁸ Survey question 76.

⁴⁷⁹ Survey question 77. CY: DCNO. FI: DCNO, CSO. MT: DCNO.

⁴⁸⁰ The DCNO reported ten persons with disabilities. Since the figure provided does not seem reliable, clarification on this will be requested from the DCNO during follow-up consultation.

Figure 43 - Extent to which the opinion of persons with disabilities was considered



Consultations with civil society organisations⁴⁸¹ were carried out to define the package of benefits in all Member States. The DCNO is the **body responsible for organising the consultations**⁴⁸² in CY, FI, IT, MT, RO. As far as SI is concerned, there was a collaboration between the DCNO and the National Council of Disabled People's Organisation of Slovenia⁴⁸³.

Table 71 - Tools used for consultations with civil society organisations

MS	Focus groups	Meetings/ presentations	Online surveys	Phone surveys
BE	✓	×	×	×
CY	✓	✓	×	×
EE	×	✓	×	×
FI	✓	×	✓	✓
IT	✓	×	×	×
MT	×	×	✓	×
RO	✓	×	✓	✓
SI	×	✓	×	✓

The perception of the overall number of service providers varies both across Member States and categories of stakeholders⁴⁸⁴.

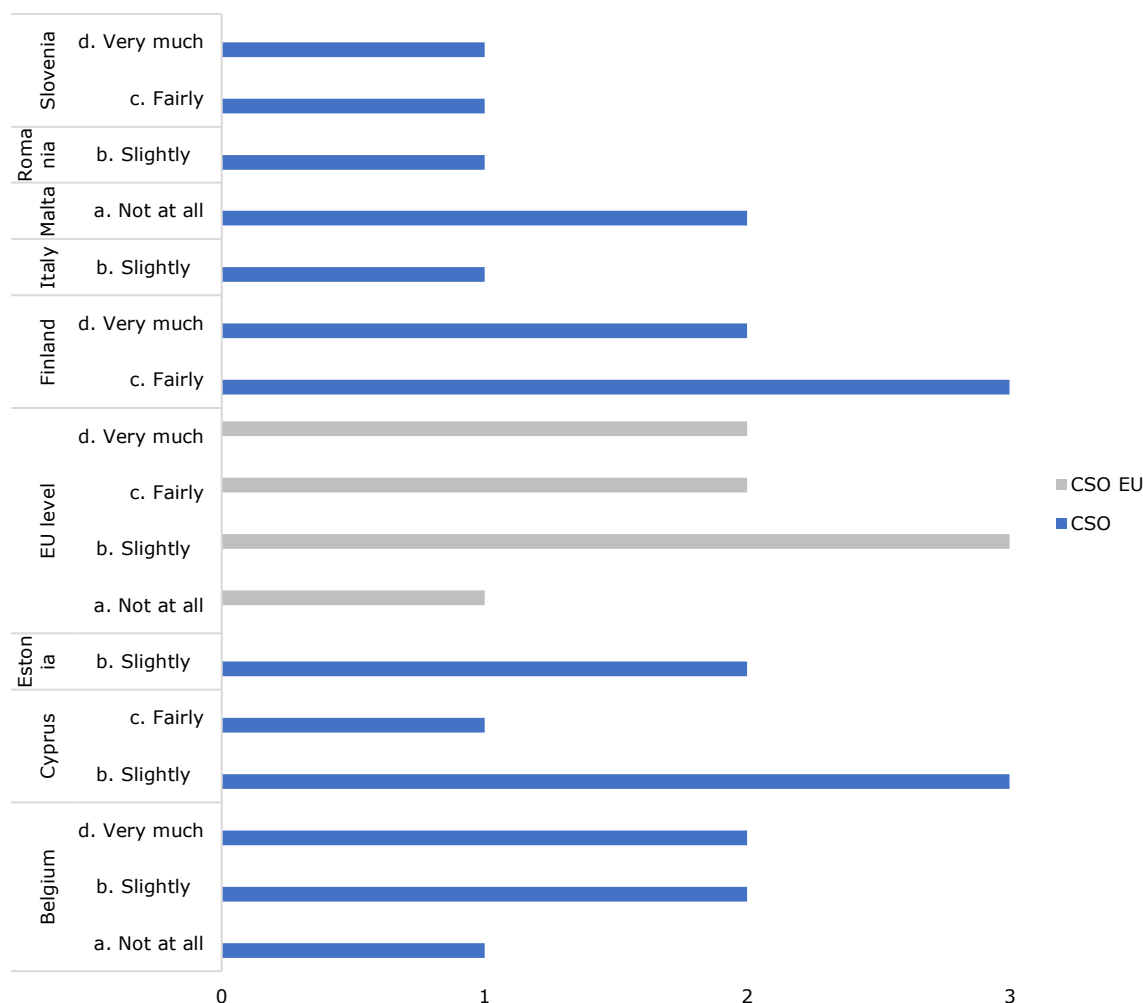
⁴⁸¹ Survey question 79. BE: DCNO, PA. CY: DCNO, 4 CSOs. EE: 2 CSOs. FI: DCNO, 4CSOs. IT: DCNO. MT: DCNO. RO: DCNO, CSO, 6 PAs.

⁴⁸² Survey question 80. BE: DCNO, PA, 3 CSOs. CY: DCNO, 5 CSOs. EE: CSO. FI: DCNO, 5 CSOs. IT: DCNO. MT: DCNO, CSO. RO: 7 PAs, CSO. SI: DCNO, CSO.

⁴⁸³ An NGO functioning as umbrella association for 24 DPOs present in the country.

⁴⁸⁴ Survey question 82.

Figure 44 - Extent to which the opinion of civil society organisations was considered



While consultations with persons with disabilities were carried out in most Member States, **consultations with experts** in the field of disability were involved only in two cases (EE, FI)⁴⁸⁵.

Features of the system

Table 72 reports the information on the **eligibility criteria**⁴⁸⁶ in each Member State.

Table 72 - Eligibility criteria across Member States

MS	Eligibility Criteria
BE	Any person with a disability recognised by one of the five Belgian institutions in the field of disability (Federal Public Service (FPS) Social Security, the Agence pour une Vie de Qualité (AViQ) in the Wallon Region, the Vlaams Agentschap voor Personen met een Handicap (VAPH) in the Flemish Region, the Service public francophone Bruxellois (Service Phare) in Brussels-Capital Region, and Service for Independent Living (DSL) in the German-speaking Community of Belgium).
CY	Cypriot and European citizens with disabilities who have a permanent residence in the area controlled by the Republic of Cyprus for at least consecutive 12 months Persons with disabilities with recognised refugee status or supplementary protection status, in accordance with the Refugee Law provided that they have long-term physical, mental, intellectual

⁴⁸⁵ Survey question 83. No information provided for EE.

⁴⁸⁶ Survey question 20. BE: DCNO, 3 PAs. CY: DCNO, 7 CSOs. EE: DCNO. FI: DCNO, 2 PAs, CSO. MT: DCNO, CSOA. RO: DCNO, 17 PAs, 3 CSOs. DPs: 20.

MS	Eligibility Criteria
	or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.
EE	.. ⁴⁸⁷
FI	Any person granted the following benefits as provided by Kela: <ul style="list-style-type: none"> • Interpreting services for persons with a hearing impairment (A) • Interpreting services for persons with hearing and visual impairments (A) • Interpreting services for persons with a speech impairment (A) • Official agreement on care by a family member (A) • Transport services under the Act on services and support for persons with disabilities Support for mobility (transport services) under the Social Welfare Act Assistance with transport (A) • Residential services under the Act on services and support for persons with disabilities (A) • Personal assistance (A) • Day activity Special social service plan and related services (A) • Visual Impairment Card (A) • Decision on special support (A) • (A) = the card will include the letter A for assistant to prove the need of an assistant or an accompanying support person.
IT	.. ⁴⁸⁸
MT	Any person with disability defined in Chapter 413 of the Laws of Malta that is, a long-term physical, mental, intellectual or sensory impairment which in interaction with various barriers may hinder one's full and effective participation in society on an equal basis with others.
RO	Children with severe, accentuated, medium or slight disabilities, based on the certificate of disability classification issued by the child protection commission in the counties, respectively the sectors of the municipality of Bucharest Adult persons with severe, accentuated, medium or slight disabilities, based either on the certificate issued by the evaluation commission of disabled persons in the counties, or by the decision issued by the higher evaluation commission of adults with disabilities
SI	Any person with recognised disability on the basis of the Equalisation of Opportunities for Persons with Disabilities Act Citizens of the Republic of Slovenia with permanent residence in the Republic of Slovenia or foreigners with permanent residence in the Republic of Slovenia: <ul style="list-style-type: none"> • Persons with Disabilities I., II. and III. categories under the Pension and Disability Insurance Act (all disabled workers - decisions based on Act) • Persons with recognised physical impairment (PI): around 90% PI due to loss of vision, around 70% PI due to hearing loss or at least 80% PI, if the PI is cumulative and the minimum percentage for one PI is at least 70% (Pension and Disability Insurance Act - physical impairment decisions) • Persons with disabilities according to the Vocational Rehabilitation and Employment of Disabled Persons Act (Decision by Employment Service of Slovenia) • Recognised status of a Persons with Disabilities according to the Act Regulating the Training and Employment of Disabled Persons (Decision by Employment Service of Slovenia) • Status acquired under the Act Concerning Social Care of Mentally and Physically Handicapped Persons (Decisions by Centre for Social Work or rarely by Pension and Disability Insurance Institute of Slovenia) • Obtained status of Persons with Disabilities according to the regulations of other EU Member States

The **issuing of the Card** is based⁴⁸⁹ on previous certificates in BE, FI, IT⁴⁹⁰, MT, RO, while a new assessment is required in SI⁴⁹¹. In CY, it is based both on previous certificates and on new assessments. The **authorities responsible for assessing the eligibility**

⁴⁸⁷ No information provided for EE.

⁴⁸⁸ No information provided for IT.

⁴⁸⁹ Survey question 21. No information provided by EE and FI. BE: DCNO, 3 PAs, 6 CSOs. CY: DCNO, 1 PA, 1 AE, 7 CSOs. FI: DCNO, PA, 9 CSOs. IT: DCNO, 2 CSOs. MT: DCNO, 2 CSOs. RO: DCNO, 17 PAs, 3 CSOs. SI: 3 CSOs. DPs: 19.

⁴⁹⁰ The Card has not been issued yet, for this reason, the answer seems to refer to the expected issuing procedures.

⁴⁹¹ This information was provided by the DCNO, but it is in contradiction with the fact that 3 CSOs declared that the issuing of the card was based on previous certificates.

criteria⁴⁹² is the DCNO in CY, MT, and RO while it is a public authority in BE, IT, and SI. The assessment of the eligibility criteria is performed under both the DCNO and a public authority in FI. In EE, the assessment is expected to be under the responsibility of a public authority.

Table 73 - Number of eligible persons per Member State⁴⁹³

MS	Eligible persons
BE ⁴⁹⁴	75.000
CY ⁴⁹⁵	-
EE	158.000
FI	300.000
IT	2.000.000
MT ⁴⁹⁶	-
RO	800.000
SI ⁴⁹⁷	-

Databases of eligible persons were created *ad hoc* during the pilot project in CY, EE, MT⁴⁹⁸. Out of those, the establishment of the database⁴⁹⁹ was inhouse in CY, EE and RO⁵⁰⁰. The **authorities responsible for the database** establishment, upload and update of information as well as maintenance differ across Member States⁵⁰¹. The creation of the database is under the responsibility of the DCNO in CY, of the public authority in EE. The upload and update of information is under the responsibility of the DCNO in CY and MT and of a public authority in EE. The DCNO is also responsible of the maintenance of the database in CY, while in EE it is a public authority (Table 74).

Table 74 - Database of eligible persons

MS	Establishing the database	Uploading information	Updating information	Maintenance of the database
BE ⁵⁰²	Crossroads Bank for Social Security	Crossroads Bank for Social Security	Crossroads Bank for Social Security	Crossroads Bank for Social Security
CY ⁵⁰³	DCNO	DCNO	DCNO	DCNO
EE ⁵⁰⁴	Public Authority	Public Authority	Public Authority	Public Authority
MT ⁵⁰⁵	-	-	-	-
RO ⁵⁰⁶	Public Authority	Private entity	Private entity	Public Authority
SI	-	-	-	-

⁴⁹² Survey question 22. BE: DCNO, 3 PAs, 2 CSOs. CY: DCNO, 1 PA, Expert, 7 PAs. EE: DCNO, 2 CSOs. FI: DCNO, 2 PAs, 9 CSOs. IT: DCNO, CSO. MT: DCNO, PA. RO: DCNO, 29 PAs. DPs: 33.

⁴⁹³ Survey question 23. BE: DCNO. EE: DCNO. FI: DCNO. IT: DCNO. MT: DCNO- RO: DCNO.

⁴⁹⁴ BE did not provide the precise number of persons eligible for the Card, however they reported that the number may correspond to the number of parking cards issued in BE.

⁴⁹⁵ No information provided for CY.

⁴⁹⁶ No information provided for MT.

⁴⁹⁷ No information provided for SI.

⁴⁹⁸ Survey question 24. No information provided for SI. BE: DCNO, 3 PAs. CY: DCNO. EE: DCNO. FI: DCNO, 2 PAs. IT: DCNO. MT: DCNO. TO: DCNO, 4 PAs.

⁴⁹⁹ Survey question 25. BE: DCNO. CY: DCNO. EE: DCNO. MT: DCNO. RO: DCNO.

⁵⁰⁰ The DCNO reported in the survey that database was not established, however such information was triangulated with the information provided during the interview, which confirmed that the database of eligible persons have been established and it is managed by the DCNO.

⁵⁰¹ Survey question 26. No information provided for SI.

⁵⁰² DCNO, 3 PAs, 6 CSOs.

⁵⁰³ DCNO. DCNO, 1 PA.

⁵⁰⁴ DCNO.

⁵⁰⁵ The DCNO replied to the survey that there was a database for eligible persons, however after triangulation through email it is confirmed that in MT there is only one database. In MT there is only one database where the data of the applicants are retained. Persons with disabilities can submit the application to the Card on the EU Disability Card's website, which is linked to the database recorded the information.

⁵⁰⁶ DCNO, 18 PAs.

In IT, a database of eligible persons already exists, and it is managed by the National Institute for Social Security (INPS), which is responsible for uploading, updating of information and maintaining it. Similarly, in RO, a database of persons with disabilities already exists and it is under the responsibility of the relevant public authority, whilst the updating and uploading of information is subcontracted to a private entity.

Databases of beneficiaries⁵⁰⁷ were established in four Member States (BE, CY, MT, RO). Out of those, the establishment of the database⁵⁰⁸ was done in-house in BE (the Crossroads Bank for Social Security) and CY, and outsourced to a private entity in MT and RO. The authorities responsible for the beneficiaries' database establishment, uploading and updating of information and maintenance differ across Member States⁵⁰⁹, as illustrated in Table 75.

Table 75 - Database of beneficiaries

MS	Establishing the database	Uploading information	Updating information	Maintenance of the database
BE ⁵¹⁰	Public Authority	Public Authority	Public Authority	Public Authority
CY ⁵¹¹	DCNO	DCNO	DCNO	DCNO
MT ⁵¹²	Private entity	DCNO	DCNO	Private entity
RO ⁵¹³	Private entity	Public Authority	Public Authority	Public Authority
SI	-	-	-	-

Databases of service providers⁵¹⁴ have been established in four Member States (BE, CY, FI, MT⁵¹⁵). Out of those, the establishment of the database⁵¹⁶ was done in-house in BE, CY and FI, while it was outsourced to a private entity in MT. The authorities responsible for the establishment of the database, uploading and updating the information and maintenance of the service provider database vary across Member States⁵¹⁷, as shown in Table 76.

Table 76 - Database of service providers

MS	Establishing the database	Uploading information	Updating information	Maintenance of the database
BE ⁵¹⁸	Public Authority	Public Authority	Public Authority	Public Authority
CY ⁵¹⁹	DCNO	DCNO	DCNO	DCNO
FI ⁵²⁰	DCNO	DCNO	DCNO	DCNO
MT ⁵²¹	-	-	-	-
SI ⁵²²	-	-	-	-

In IT, where the Card has not been implemented yet, it is envisaged that once the system is in place, the social insurance institution, INPS, will be responsible for establishment, updating and maintenance of the database of service providers.

⁵⁰⁷ Survey question 30. No information provided for SI.

⁵⁰⁸ Survey question 31.

⁵⁰⁹ Survey question 32. No information provided for SI.

⁵¹⁰ DCNO, 3 PAs.

⁵¹¹ DCNO.

⁵¹² DCNO.

⁵¹³ DCNO, 19 PAs.

⁵¹⁴ Survey question 46. No information provided for EE and SI.

⁵¹⁵ The DCNO replied to the survey that there was a database for service providers; however, after triangulation through e-mail it was confirmed that in MT there is only one database where the data of the applicants are retained. Persons with disabilities can submit the application to the Card on the EU Disability Card's website, which is linked to the database recording the information.

⁵¹⁶ Survey question 47.

⁵¹⁷ Survey question 48. No information provided by EE and SI.

⁵¹⁸ DCNO, 2 PAs.

⁵¹⁹ DCNO.

⁵²⁰ No information provided either by the DCNO and PA.

⁵²¹ See footnote 249

⁵²² No information provided.

The **production** of the Card⁵²³ is carried out in-house in CY and RO⁵²⁴, and is outsourced in BE, FI, IT⁵²⁵ and MT. In IT and in EE, the production is expected to be outsourced to a private entity (Postel S.p.a.) in the former and to be done in-house in the latter. The body responsible for the Card's production⁵²⁶ is the DCNO when in-house (CY and RO⁵²⁷) and a private entity (BE, FI, MT) when outsourced.

Table 77 - Card production and bodies responsible for the production of the Card

MS	Card production	Bodies responsible for production
BE	Outsourced	Private entity
CY	In-house	DCNO
EE	-	Public Authorities
FI	Outsourced	Private entity
IT	Outsourced	Private entity
MT	Outsourced	Private entity
RO	In-house	Public Authorities
SI	-	-

Table 78 summarises the data collected through the surveys on the number of applications the DCNOs received. A more comprehensive overview of applications received can be found in Table 23 of the Core Report.

Table 78 - Number of applications received from 2015 to 2018⁵²⁸

MS	2015	2016	2017	2018	Total
BE ⁵²⁹	0	0	-	-	-
CY	0	0	137	1,108	1,245
EE	0	0	0	0	0
FI	0	0	0	5,157	5,157
IT	0	0	0	0	0
MT	0	0	1,500	2,400	3,900
RO	0	0	6,381	3,717	10,098
SI ⁵³⁰	-	-	-	-	-

The **submission of the application**⁵³¹ can be conducted both at a physical office and online in BE, MT and RO. In FI, the submission is completely online, while, in CY⁵³² it must be submitted at a physical office⁵³³. In EE, the application process is not completed yet; however, it is expected to be online.

Table 79 - Submission of the application

MS	Online	Physical office	Both at physical office and online
BE	×	×	✓
CY	×	✓	×

⁵²³ Survey question 91. No information provided for EE and SI. BE: DCNO, 3 PAs. CY: DCNO. FI: DCNO. MT: DCNO. RO: DCNO, 9 PAs.

⁵²⁴ In RO, the production and personalisation of the first 50,000 Cards were subcontracted by the DCNO to a private entity; however, when the EU funding was exhausted, the contract was not renewed with the private entity and the DCNO internalised the personalisation of the Card. Discussion is ongoing regarding the production of new Cards.

⁵²⁵ Since the Card has not been issued yet, the answer seems to refer to the expected production procedure.

⁵²⁶ Survey question 90. No information provided for SI. BE: DCNO, 3 PAs. CY: DCNO, 1 AE. EE: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: DCNO 14 PAs.

⁵²⁷ See footnote 142.

⁵²⁸ Survey question 33. DCNOs from CY, FI, MT, RO.

⁵²⁹ No information provided for BE for 2017 and 2018.

⁵³⁰ No information provided for SI.

⁵³¹ Survey question 34. No information provided for IT and SI. BE: DCNO, 3 PAs. CY: DCNO, PA. EE: DCNO. FI: DCNO. MT: DCNO. RO: DCNO, 20 PAs. DPs: 28

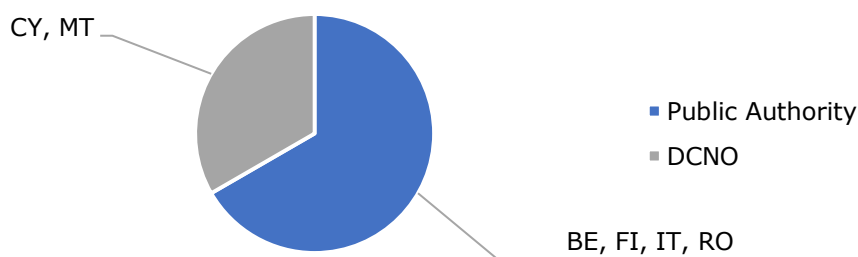
⁵³² According to 2 DPs, the submission is both online and at a physical office. However, most of them (7) declared that application submission happens at a physical office as also confirmed by the DCNO.

⁵³³ No information provided for IT and SI.

MS	Online	Physical office	Both at physical office and online
FI	✓	✗	✗
MT	✗	✗	✓
RO	✗	✗	✓
SI	-	-	-

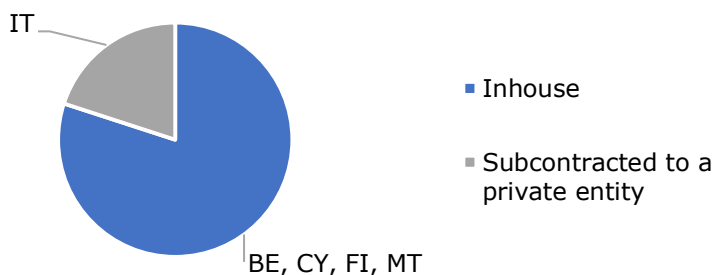
The **authority responsible for receiving applications for the Card**⁵³⁴ is a public authority in BE, FI, RO and the DCNO in CY and MT. In IT, the Card has yet to be issued; however, it is expected that the application process will be managed by the INPS.

Figure 45 - Authorities responsible for receiving the applications



A **helpline** was established in BE, CY, FI, IT, MT, SI⁵³⁵. The helpline may either give support⁵³⁶ for the application process (CY, FI, IT, MT, SI) and/or for the use of the Card (CY⁵³⁷, FI, IT⁵³⁸, MT, SI). The helpline was established in-house in four Member States (BE, CY, FI, MT), and it was outsourced to a private entity in IT⁵³⁹.

Figure 46 – Establishment of the helpline



On average, the **application process** is considered to be **user-friendly** among DCNOs and PAs, but less so in the view of the CSOs. In BE, the DCNO reported that persons applying for the Card can choose to submit the application to any of the four regional issuing authorities, which already possess personal information on their impairment. In FI, the DCNO reported that the online application is not very accessible, even if it was tested;

⁵³⁴ Survey question 35. No information provided for EE and SI. BE: DCNO, 4 PAs. CY: DCNO, 1 AE, 1 PA. FI: DCNO. IT: 2 PAs. MT: DCNO. RO: DCNO, 23 PAs. DPs: 30.

⁵³⁵ Survey question 36. BE: DCNO, 1 PA, 3 CSOs. CY: DCNO, 6 CSOs. EE: DCNO. FI: DCNO, 10 CSOs. IT: DCNO. MT: DCNO. RO: DCNO, 11 PAs. DPs: 33. As far as IT is concerned, the DCNO reported that a helpline for the Card was established, hence the answer should refer to the design of the helpline. This seems confirmed by the fact that all DP respondents (2) denied that the helpline was established.

⁵³⁶ Survey question 37. In EE and RO, the helpline was not established. BE: DCNO, PA. CY: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: 7 PAs. DPs: 18.

⁵³⁷ This information is according to the DP and CSO but not to the DCNO, which replied that the helpline was only used to assist in applying for the Card. This contradiction will be resolved for the final report.

⁵³⁸ Survey Question 39.

⁵³⁹ Survey Question 38. BE: DCNO, PA. CY: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: 7 PAs.

however, the helpline that was established facilitates the process for application to all users. In MT, the submission of the application can be done through the Card national website, otherwise persons with disabilities can deliver the application form directly to the DCNO office or send it by post. The application is thought to be easy and limited information is required. In RO, the applicants should submit a request to the General Directorate of Social Assistance and Child Protection (DGASPC), which forwards the applications to the DCNO on a monthly basis. The DGASPC then communicates directly to the beneficiaries the date when the Card can be collected at their offices.

As regards persons with disabilities, these were generally satisfied with the application process, with only a minority of them considering the process as not user-friendly.

Figure 47 - Assessment of the user-friendliness of the application process according to persons with disabilities

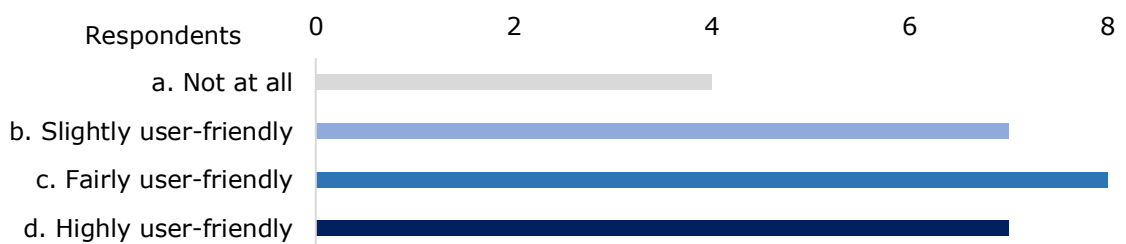
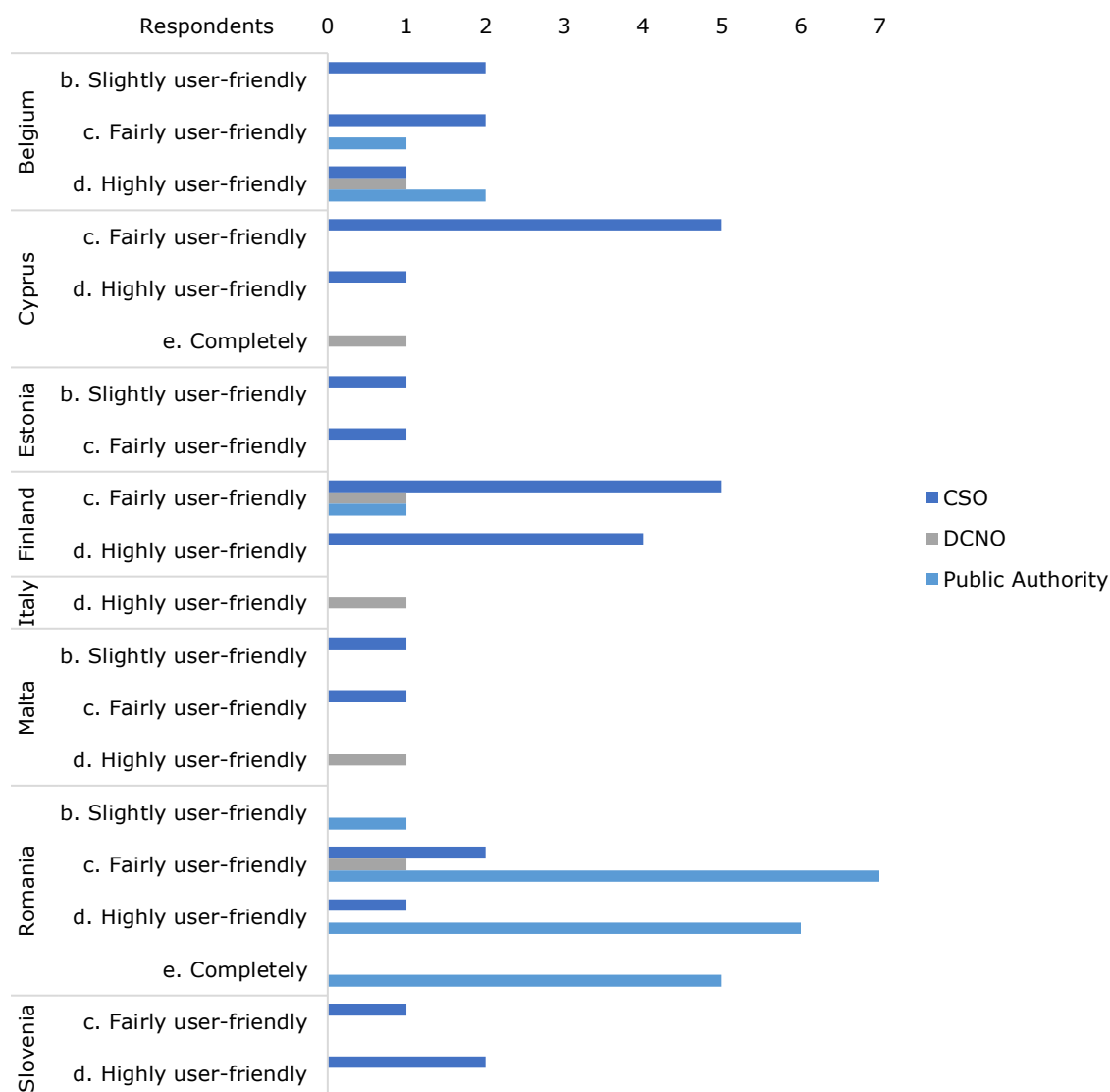


Figure 48 – Assessment of the user-friendliness of the application process per stakeholders



On average, the **time between the submission of the application and the reception of the Card** is three weeks⁵⁴⁰. In CY and MT, the applicants wait two weeks before receiving the Card, and the wait is one month in BE, FI, RO.

As far as the **delivery of the Card** is concerned, it is done internally⁵⁴¹ in three Member States (CY, MT, RO) and outsourced in BE and FI. In IT, delivery is expected to be outsourced. As is the case with production, the body responsible for the delivery⁵⁴² is the DCNO in CY, MT, RO when in-house, and a private entity when it is outsourced (BE, FI, IT). The delivery of the Card is **free**⁵⁴³ in all Member States (BE, CY, MT, RO, SI), except for FI where the beneficiaries are asked to pay €10⁵⁴⁴.

⁵⁴⁰ Survey question 41. BE: DCNO, 2 PAs. CY: DCNO. FI: DCNO. MT: DCNO. RO: DCNO, 19 PAs.

⁵⁴¹ Survey question 93. No information provided for EE and SI. BE: DCNO, 2 PAs. CY: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: DCNO, 15 PAs.

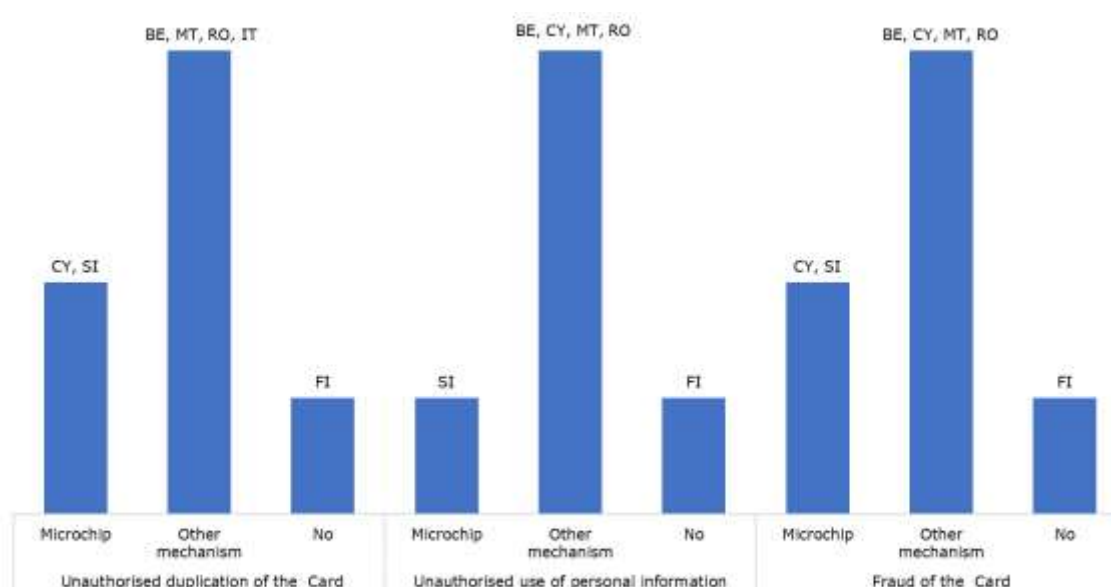
⁵⁴² Survey question 92. BE: DCNO, 2 PAs. CY: DCNO. EE: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: DCNO, 10 PAs.

⁵⁴³ Survey question 94. BE DCNO, 2 PAs, 5 CSOs. CY: DCNO, CSOs. EE: CSO. FI: DCNO, PA, 8 CSOs. IT: DCNO. Mt: DCNO, CSO. RO: DCNO, 16 PAs, 2 CSOs. No information is provided for IT. DPs: 18.

⁵⁴⁴ Survey question 95. FI: DCNO.

In terms of **security mechanisms**, Member States established both mechanisms to safeguard the cards of persons with disabilities, as well as the protection of data contained in the databases (persons with disabilities, beneficiaries and service providers). To this end, with the exception of FI, most Member States established safeguard mechanisms⁵⁴⁵ to protect from possible unauthorised duplication of the Card, unauthorised use of personal information and fraud. In CY, FI, MT and SI, microchip mechanisms are in place⁵⁴⁶.

Figure 49 - Mechanisms in place to safeguard cards and data of persons with disabilities



Most Member States (BE, CY, FI, MT, RO, SI) introduced measures to **ensure data protection**⁵⁴⁷ for the existing databases of eligible persons, beneficiaries, and service providers.

The Card differs across Member States in terms of sectors covered and benefits provided. As far as the sectors⁵⁴⁸ are concerned, culture and leisure are covered by the Card in all Member States, sport is not covered in IT, and transport coverage varies across Member States.

The table below provides information on the type of price reduction⁵⁴⁹ offered by service providers in each participating country⁵⁵⁰.

Table 80 – Type of price reduction offered to persons with disabilities per Member State

MS	0-24%	25-49%	50-74%	Above 75%	Free entrance
BE	✓	×	×	×	×

⁵⁴⁵ Survey question 96. BE: DCNO, 1 PA. CY: DCNO. EE: CSO. FI: DCNO, 5 CSOs. IT: DCNO. MT: DCNO. RO: DCNO. SI: DCNO, 42 CSOS. DPS: 39. No information provided for EE. In IT, the Card has not been established yet, hence the information provided is considered as expected.

⁵⁴⁶ Details on the mechanisms in place in BE, IT, MT, RO are not described.

⁵⁴⁷ Survey question 97. BE: DCNO. CY: DCNO. FI: DCNO. IT: DCNO. MT: DCNO. RO: DCNO, 5 PAs. DPS: 34.

⁵⁴⁸ Survey question 57.

⁵⁴⁹ In CY, the average price of a regular entrance ticket at service providers' sites is €2.7 in CY while around €30 in FI and roughly €4 in RO (Survey question 60. For BE, EE, IT, MT and SI this information is not available).

⁵⁵⁰ Survey question 59. BE: 1 SP. CY: 3 SPs. EE: 2 SPs. FI: 2 SPs. MT: 2 SPs. RO: 2 SPs.

MS	0-24%	25-49%	50-74%	Above 75%	Free entrance
CY	×	×	×	×	✓
EE	✓	×	×	×	×
FI	✓	✓	×	×	×
MT	×	✓	×	×	✓
RO	×	✓	×	×	✓

In BE, CY, EE, FI, MT and RO, the Card provides benefits also to the assistant of persons with disabilities⁵⁵¹. As illustrated in Table 81, with the exception of CY, the same price reduction offered to persons with disabilities was generally provided to the assistants⁵⁵².

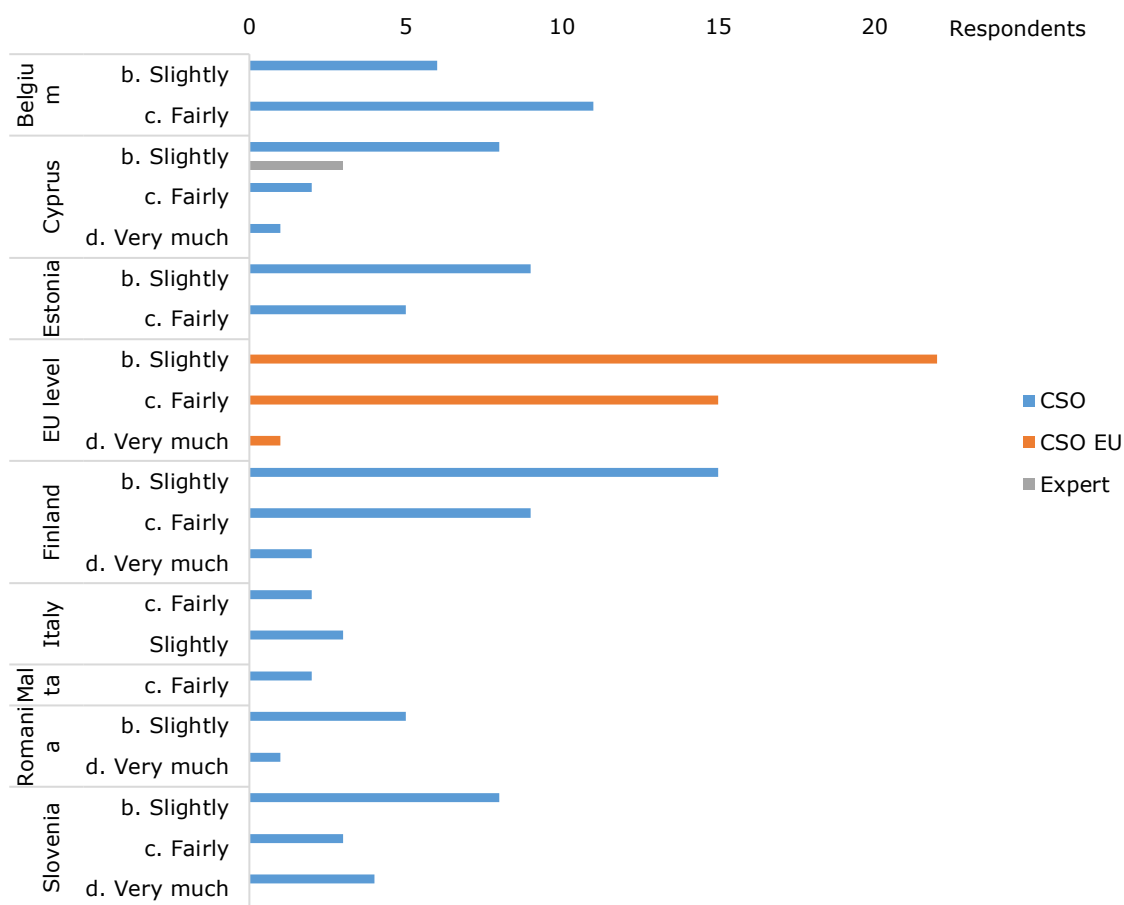
Table 81 - Type of price reduction offered to the assistants of persons with disabilities across Member States

Member State	0-24%	25-49%	50-74%	Above 75%	Free entrance
BE	✓	×	×	×	×
CY	×	×	×	✓	✓
EE	✓	×	×	×	×
FI	✓	✓	×	×	×
MT	×	✓	×	×	✓
RO	×	✓	×	×	✓

⁵⁵¹ Survey question 61. BE: 1 SP. CY: 3 SPs. EE: 1 SP. FI: 2 SP. MT: 4 SP. RO: 2 SP.

⁵⁵² Survey question 63. BE: 1 SP. CY: 2 SPs. EE: 3 SPs. FI: 1 SP. MT: 4 SPs. RO: 1 SP.

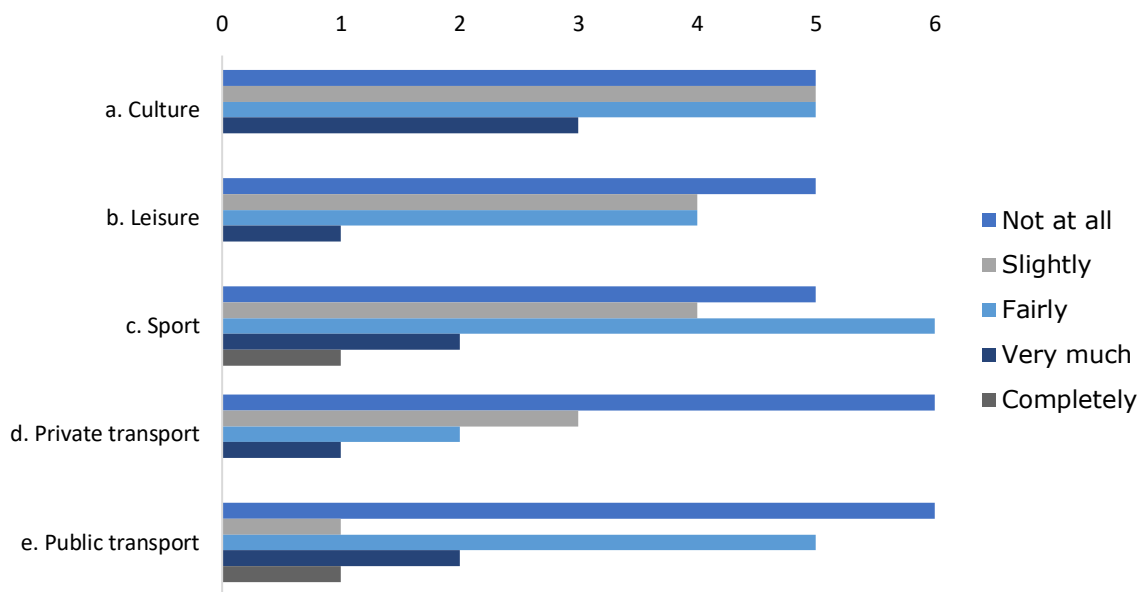
Figure 50 - Extent to which benefits/services offered respond to the actual needs of persons with disabilities⁵⁵³



As shown in Figure 50, opinions regarding the extent to which benefits/services offered respond to the actual needs of persons with disabilities were generally moderate across stakeholders and countries. In no country was it perceived that benefits/services were not able to meet the needs of persons with disabilities in CY, FI, SI, and at the EU level some stakeholders affirmed that services/benefits offered were considered very much in line with the needs of persons with disabilities. The feedback of persons with disabilities was more pessimistic, with the majority of them expressing neutral to negative views (Figure 51).

⁵⁵³ Survey question 66. BE: 5 CSOs. CY: 4 CSOs, 1 AE. EE: 3 CSOs. FI: 7 CSOs. IT: 1 CSO. MT: 2 CSOs. RO: 3 CSOs. SI: 3 CSOs.

Figure 51 - Extent to which benefits/services offered respond to the actual needs of persons with disabilities by sector⁵⁵⁴



According to the DCNOs, there are some **key needs not covered by current benefits/services⁵⁵⁵**. For instance, respondents in BE and MT highlight that benefits covered by the Card should be accompanied by measures toward increased accessibility of services. In CY the DCNO identified the inclusion of cinemas, private theatres as well as public transport as key needs to be included⁵⁵⁶. In RO the transport sector was identified, as well as in SI. However, the DCNOs considered the benefits offered⁵⁵⁷ by service providers to be well-selected to a medium (BE, EE, FI) and high (CY, MT, RO) extent. According to EU CSOs, benefits were slightly to fairly well selected. On this aspect, the DCNO from FI reported that the service providers have been selected quite randomly until now, and the aim is to define more tailored selection procedures for 2020. On the other hand, in CY, respondents found that service providers are willing to cover the needs of persons with disabilities.

⁵⁵⁴ Survey question 66. BE: 5 CSOs. CY: 4 CSOs, 1 AE. EE: 3 CSOs. FI: 7 CSOs. IT: 1 CSO. MT: 2 CSOs. RO: 3 CSOs. SI: 3 CSOs.

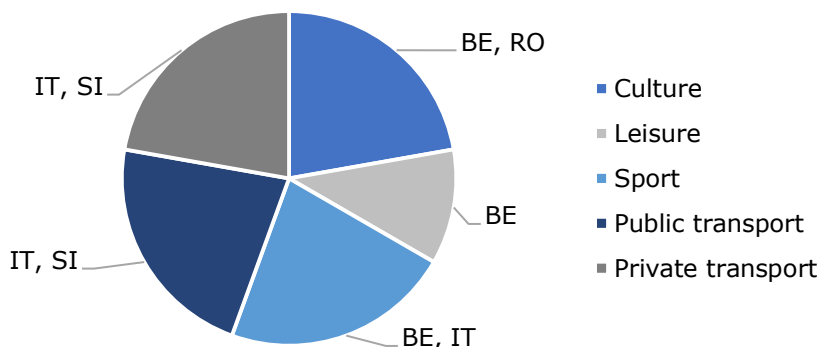
⁵⁵⁵ Survey question 67. Information not provided for EE, FI, IT.

⁵⁵⁶ This information contradicts the information on the sectors covered in CY. From question 57, the public transport sector in CY is included by the Card, while the private transport is still excluded.

⁵⁵⁷ Survey question 68. BE: DCNO, 1 PA, 5 CSOs, 1 SP. CY: DCNO, 5 CSOs, 3 SPs, 1 AE. EE: DCNO, 4 CSOs, 2SPs. FI: DCNO, 1 PA, 8 CSOs, 1 SP. IT: 2 CSOs. MT: DCNO, 2 CSOs, 4 SPs. RO: DCNO, 16 PAs, 3 CSOs, 2 SPs. SI: 3 CSOs

According to the respondents, all sectors **presented problems**⁵⁵⁸.

Figure 52 – Sectors which encountered the most problems



Concerning the **issues related to the use of the Card**⁵⁵⁹, the DCNOs reported that the low awareness of service providers is an issue in BE and RO, and so is the low awareness of organisations involved in cultural, sport, tourism, and transport sectors in FI, MT, SI. In CY, the DCNO reported that misunderstanding concerning the benefits available to the beneficiaries is a problem. According to DPs across all Member States, the main issues related to the use of the Card were the low awareness of services providers involved in the Card’s scheme paired with the low awareness of organisations active in the four sectors in scope. In most Member States (BE, CY, FI, MT, RO), the DCNO is the **authority responsible for handling complaints**⁵⁶⁰, and in BE and in SI the DCNO collaborates with the public authorities in this task.

Awareness-raising activities

Awareness-raising activities⁵⁶¹ were carried out in most Member States (BE, CY, EE, FI, MT, RO, SI). Different activities⁵⁶² such as the production of brochures, press conferences, public debates TV/audio spot advertisements and social media campaigns were carried out in order to raise awareness of the Card. Communication campaigns have been conducted in all Member States where awareness-raising activities were carried out (BE, CY⁵⁶³, FI, EE, MT, RO, SI). The Card was not advertised in exhibitions and festivals⁵⁶⁴, and only RO organised training sessions (Table 82).

⁵⁵⁸ Survey question 100. No information provided for CY, EE, MT. IT provided information, however this information contradicts the fact that in IT the Card has not been issued yet. In addition, all survey DP respondents in IT (2) affirmed that awareness-raising activities were not carried out. BE: DCNO, 2 CSOs, 1 PA. CY: 2 CSOs. EE: CSO. FI: 2 CSOs. IT: DCNO. MT: CSO. RO: DCNO, 4 PAs, CSO. SI: DCNO.

⁵⁵⁹ Survey question 99. No information provided for EE and IT. BE: DCNO, 2 PAs, 4 CSOs. CY: DCNO, 2 CSOs. EE: CSO. FI: DCNO, 5 CSOs. 1PA. IT: DCNO. MT: DCNO, CSO. RO: DCNO, 6 PAs, CSO. SI: CSO. DPs: 17.

⁵⁶⁰ Survey question 103. BE: DCNO, PAs, CSOs. CY: DCNO, CSO. EE: CSO. FI: DCNO, 3 CSOs. IT: DCNO. MT: DCNO, CSO. RO: DCNO, 7 PAs, CSO.

⁵⁶¹ Survey question 105. BE: DCNO, 5 CSOs, 3 PAs, 1 SP. CY: DCNO, 4 CSOs, 3 SPs. EE: 3 CSOs, 2 SP. FI: DCNO, 1 PA, SP. IT: DCNO, 2 CSO. MT: DCNO, 2 CSOs, 2 SPs. RO: DCNO, 1 CSO, 18 PAs, 3 SPs. SI : DCNO, 1 CSO.

⁵⁶² Survey question 106. BE: DCNO, 13 CSOs, 13 PAs, 4 SPs. CY: DCNO, 4 CSOs, 8 SPs. EE: 3 CSOs, 7 SPs.

⁵⁶³ Only one SP reported to have carried out a communication campaign in CY. We inferred from the interview findings that a communication campaign was carried out in CY.

⁵⁶⁴ One CSO from FI, two SP from MT and two PA from RO reported a festival or exhibition.

Table 82 - Awareness-raising activities carried out per Member State

MS	Brochures in multiple languages	Communication campaigns	Social media campaigns	Press conference	Events, conferences & meetings	Public debates and roundtable	Festivals	Training sessions
BE	✓	✓	✓	✓	✓	×	×	×
CY	✓	✓	×	✓	×	×	×	×
EE	×	✓	×	×	✓	×	×	×
FI	✓	✓	✓	×	✓	✓	×	×
MT	×	✓	✓	✓	✓	×	×	×
RO	✓	✓	✓	✓	✓	×	×	✓
SI	✓	✓	✓	✓	✓	✓	×	×

In SI, the DCNO launched dissemination activities to promote the Card throughout the country, in particular in six major Slovenian cities (Ljubljana, Kranj, Maribor, Koper, Murska Sobota and Novo).

In BE, four main activities were launched:

- A website was developed in an accessible format (in compliance with the label Anysurfer accessibility⁵⁶⁸) providing information on the conditions and ways of obtaining the Card and on the benefits and services granted;
- An information campaign for people with disabilities was conducted with a four-language information brochure (DE, EN, FR, NL) plus an easy-to-read version and a Braille brochure (FR, NL) and posters in four languages (DE, EN, FR, NL);
- Brochures and posters were distributed on different networks of persons with disabilities (five public institutions, health mutual societies and organisations of persons with disabilities);
- National general information campaign was launched in the press, in various media or through local media in cultural and sports venues and postcards in four languages (DE, EN, FR, NL).

In RO, both the DCNO and the DGASPC launched an audio-visual promotion at the national level.

Concerning the stakeholders involved⁵⁶⁹, the awareness-raising activities targeted persons with disabilities in all Member States. Generally, awareness-raising activities were addressed also to national beneficiaries (BE, EE⁵⁷⁰, FI, MT, RO, SI). Only the BE DCNO reported targeting foreign beneficiaries (Table 83).

⁵⁶⁵ 3 SP and a CSO reported social media campaigns.

⁵⁶⁶ 1 CSO and a SP reported social media campaigns.

⁵⁶⁷ This information was triangulated from the interviews.

⁵⁶⁸ See at: <https://www.anysurfer.be/fr>

⁵⁶⁹ Survey question 107. BE: DNCO, 1 PA, 5 CSOs 1 SP. CY: DCNO, 5 CSOs, 3 SPs, 1 AE. EE: DCNO, 3 CSOs, 3 SPs. FI: DCNO, 2 PAs, 6 CSOs, 2 SPs. IT: DCNO. MT: DCNO. RO: DCNO, 14 PAs, 2 SPs. SI: 3 CSOs.

⁵⁷⁰ 1 CSO and 1 SP.

Table 83 - Target stakeholders

MS	Beneficiaries	Public service providers	Private service providers	Foreign beneficiaries	Civil Society Organisations	Businesses, companies	Persons with disabilities	Educational staff/teachers	Authorities for data protection	Health care professionals
BE	✓	✓	✗ ⁵⁷¹	✓	✓	✗	✓	✓	✓	✓
CY	✗	✗	✗	✗	✗	✗	✓	✗	✗	✗
EE ⁵⁷²	✓	✓	✗	✗	✓	✗	✓	✗	✗	✗
FI	✓	✓	✓	✗	✓	✓	✓	✓	✗	✓
MT	✓	✓	✓	✗	✗	✓	✓	✗	✗	✗
RO	✓	✓ ⁵⁷³	✗	✗	✓	✗	✓	✗	✗	✗
SI	✓	✓	✓	✗	✓	✗	✓	✗	✓	✗

BE and FI reported the most success in reaching their target groups through awareness-raising activities⁵⁷⁴. SI and MT had lower response rates to the survey, but those who responded did so positively overall. In FI and MT the DCNO reported that the activities were “very much” able to reach the target groups and, those in CY reported that they were “completely” able to do so. In MT, there was a high participation rate of service providers, which decided to provide benefits through the Card system.

Concerning the awareness-raising tools⁵⁷⁵, all Member States (BE, CY, FI, MT, RO, SI) used the Card national website and, in most cases (BE, CY, MT, RO, SI, EE⁵⁷⁶), TV and advertisements as well as social networks (BE, CY⁵⁷⁷, EE⁵⁷⁸, FI, IT, MT, RO, SI). No podcasts were used for the awareness-raising activities, neither were CDs and DVDs nor E-books. With the exception of SI, no participating Member States set up a mobile app. Only service providers in BE and MT reported that they had created advertisements with specific reference to the Card.

Table 84 - Tools used for awareness-raising activities

MS	Mobile apps	Social network	TV/audio spot/ advertisement	Website/blog	Newsletter	CD/DVD	E-book	Film/video	Newspaper/magazine	Podcast
BE	✗	✓	✓	✓	✓	✗	✗	✗	✓	✗
CY	✗	✗	✓	✓	✗	✗	✗	✓	✓	✗
FI	✗	✓	✗	✓	✓	✗	✗	✗	✗	✗
MT	✗	✓	✓	✓	✗	✗	✗	✓	✗	✗
RO	✗	✓	✓	✓	✓	✗	✗	✗	✓	✗
SI	✓	✓	✓	✓	✓	✗	✗	✗	✓	✗

⁵⁷¹ This information was provided by the DCNO and triangulated with information provided during the interview. 1 PA and 1 CSO reported that private service providers were targeted, however this response rate was deemed too low to overcome the DCNO reporting.

⁵⁷² Based on few respondents from EE.

⁵⁷³ According to the PA respondents.

⁵⁷⁴ Survey question 108. BE: DCNO, 1 PA, 5 CSOs, 1 SP. CY: DCNO, 4 CSOs, 3 SPs. EE: 3 CSOs, 3 SPs. FI: DCNO, 1 PA, 8 CSOs, 1 SP. IT: DCNO, 2 CSOs. MT: DCNO, 1 CSO, 2 SPs. RO: DCNO, 15 PAs, 1 CSO, 2 SPs. SI: 3 CSOs.

⁵⁷⁵ Survey question 110. BE: DCNO, 1 PA, 5 CSOs, 1 SP. CY: DCNO, 4 CSOs, 3 SP. EE: 2 CSOs, 1 SP. FI: DCNO, 1 PA, 8 CSOs, 1 SP. IT: DCNO, 2 CSOs. MT: DCNO, 1 CSO, 2 SP. RO: DCNO, 13 PAs, 1 CSO, 2 SPs. SI: 3 CSOs.

⁵⁷⁶ According to a CSO and a SP.

⁵⁷⁷ According to a CSO and a SP.

⁵⁷⁸ According to a CSO and a SP.

Results

DCNOs in BE, CY, FI, RO and SI reported performing monitoring activities on the Card system⁵⁷⁹.

Periodic surveys are launched in:

- BE to collect aggregate statistics on the monthly number of Cards issued;
- CY to collect data on user feedback on the Card provided by beneficiaries;
- FI to collect data on the number of beneficiaries and assistants as well as service provider evaluation surveys.

In RO, the DCNO emphasised that it is difficult to collect information on the use of the Card due to the lack of an electronic system. However, the DCNO collects aggregated statistics by extracting information from the reports filed from complaints of Romanian beneficiaries both in RO and abroad. Information collected refers to the number of Cards issued as well as personal information including age, sex, county of residence. The Public Authority in RO collects personal data as well, including the beneficiaries' names, card numbers and dates of creation. They explained that the eligibility conditions require management, analysis and centralisation of personal data at the DGASPC as well as the introduction of data in the site identification structure.

In SI, the DCNO collects data on the number of applications received along with information on beneficiaries' experiences. Evaluations of the Card⁵⁸⁰ are ongoing in BE and CY.⁵⁸¹ At the EU level, annual reports are conducted to analyse the state of play of the project.

Stakeholder opinions on the extent to which the Card contributed to cross-border mobility of persons with disabilities⁵⁸² were skewed toward "fairly" when considering all stakeholders and countries. Among stakeholders, the DCNOs proved to be more enthusiastic than CSOs and PAs. Cross-country analysis demonstrated that CY and EE were the Member States where respondents held the most positive views⁵⁸³.

⁵⁷⁹ Survey question 112. BE: DCNO, 1 PA, 2 CSOs. CY: DCNO. EE: 1 CSO, 3 SPs. FI: DCNO, 2 CSOs. MT: 1 CSO, 3 SPs. RO: DCNO, 10 PAs, 1 SP. SI: 2 CSOs.

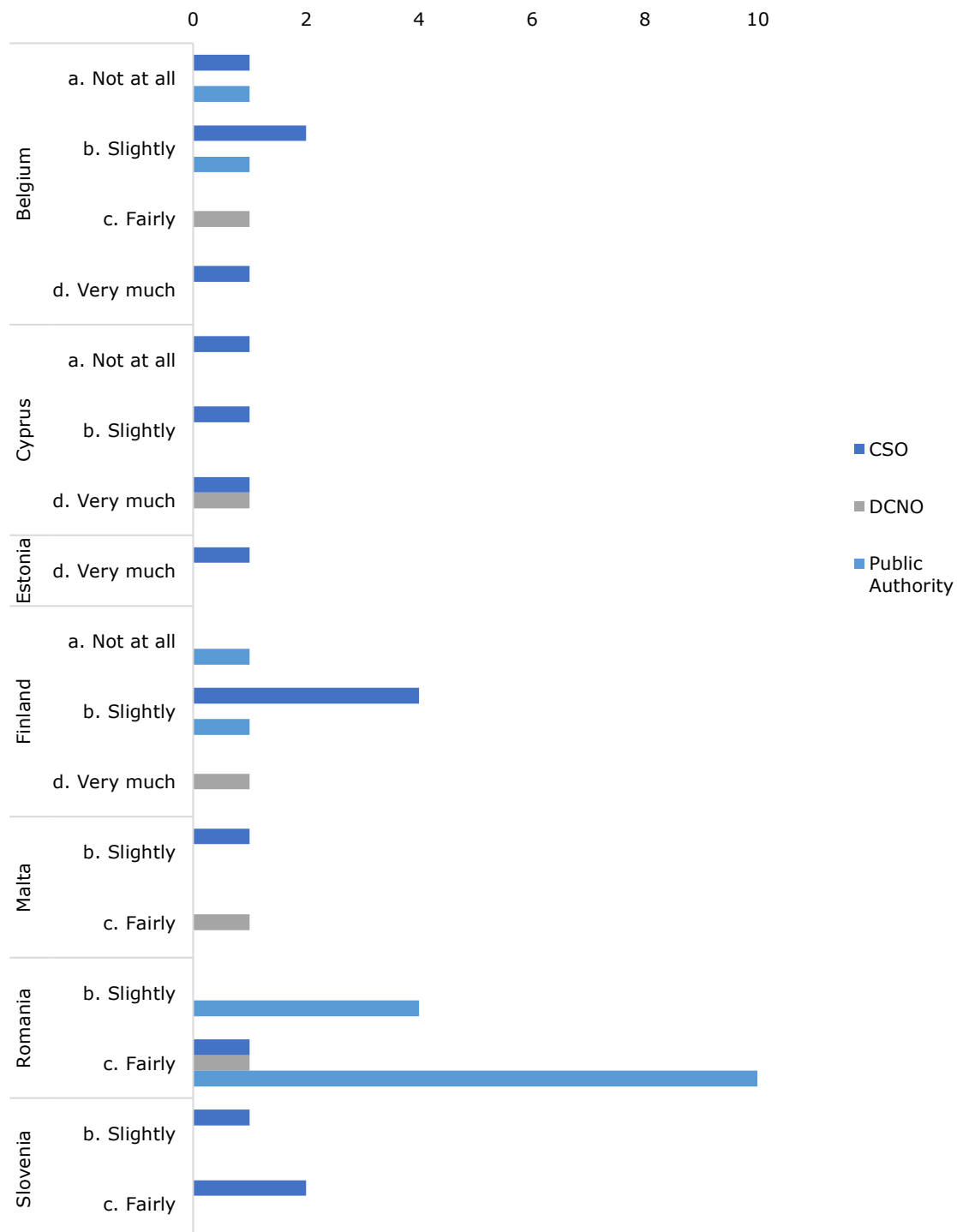
⁵⁸⁰ Survey questions 115. No information provided for IT, SI, EE. BE: DCNO, 1 PA. CY: DCNO. FI: DCNO. MT: DCNO. RO: DCNO, 12 PAs.

⁵⁸¹ Survey question 116. No information provided for EE, IT, MT, SI. BE: DCNO, 1 PA. CY: DCNO. FI: DCNO. RO: DCNO, 1 PA.

⁵⁸² Survey question 117. BE: DCNO, 5 CSOs, 1 SP. CY: DCNO, 4 CSOs, 2 SPs. EE: 3 CSOs, 2 SPs. FI: DCNO, 2 PAs, 7 CSOs. IT: 1 CSO. MT: DCNO, 1 CSO, 2 SPs. RO: DCNO, 16 PAs, 1 CSO, 2 SPs. SI: DCNO, 3 CSOs.

⁵⁸³ However, it should be considered the very low response-rate from these Member States: 6 responses from CY, 3 from EE

Figure 53 - Increased mobility

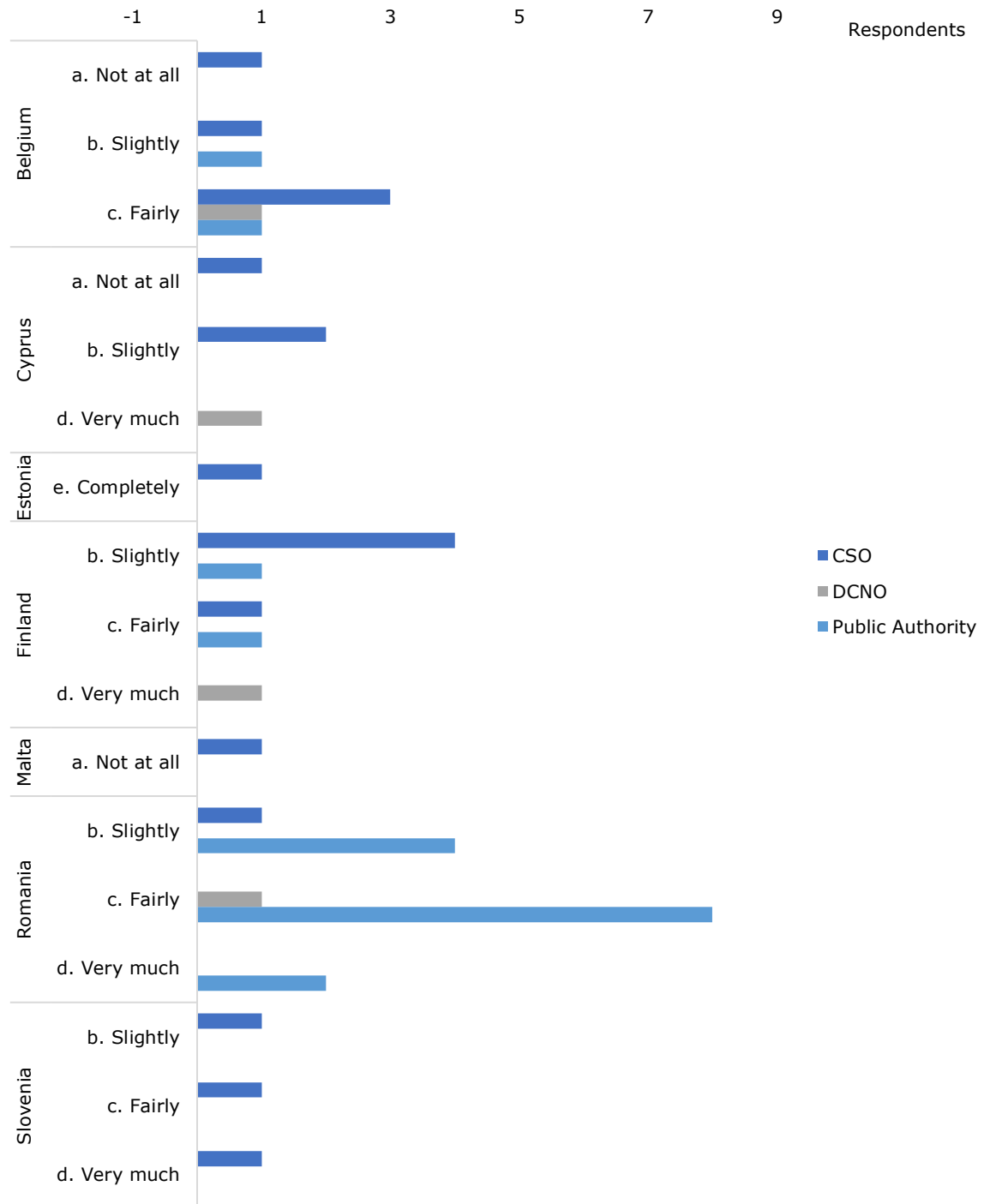


Regarding the extent to which the Card contributed to greater participation of persons with disabilities in cultural events⁵⁸⁴, responses from all stakeholders and countries tended to centre around “fairly” and “slightly”.

Among stakeholders, the DCNOs again tended to be more positive than other stakeholders. Cross-country analysis shows that BE, EE, RO and SI leaned toward “fairly” whereas CY, FI and MT trended toward “slightly”.

⁵⁸⁴ Survey question 118. BE: DCNO, 1 PA, 5 CSO, 1 SP. CY: DCNO, 4 CSO, 2 SP, 1 AE. EE: 3 CSO, 2 SP. FI: DCNO, 1 PA, 8 CSO. IT: CSO. MT: DCNO, 2 SP. RO: DCNO, 16 PA, 1 CSO, 2 SP. SI: 3 CSO.

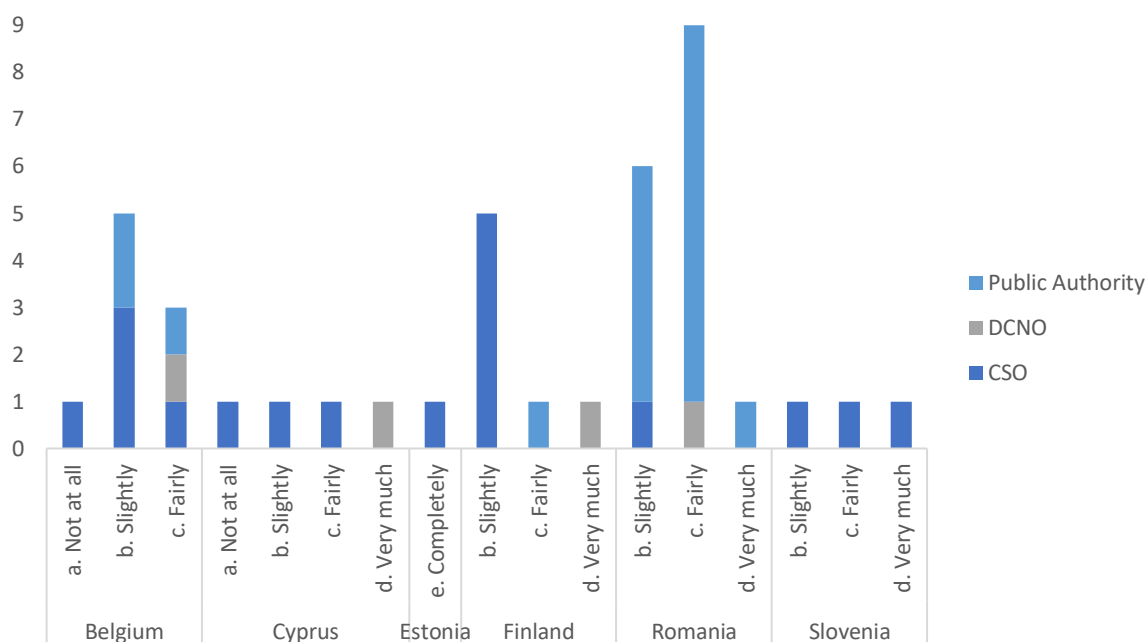
Figure 54 - Increased participation in cultural events



Opinions regarding participation in **sporting events**⁵⁸⁵ showed similar results. Among the pilot countries, respondents from EE, RO and SI answered more positively than those from BE, CY and FI. The Public Authorities centred around “fairly” whereas the Civil Society Organisations tended to answer “slightly”.

⁵⁸⁵ Survey question 119. BE: DCNO, 5 CSO, 1 SP. CY: DCNO, 4 CSO, 2 SP, 1 AE. EE: 3 CSO, 2 SP. FI: DCNO, 2 PA, 8 CSO. IT: 1 CSO. MT: DCNO, 1 CSO, 2 SP. RO: DCNO, 16 PA, 1 CSO, 2 SP. SI: 3 CSO.

Figure 55 - Increased participation in sporting events



Overall, stakeholders considered the Card to have increased the number of **public providers offering benefits** to persons with disabilities. Cross-country analysis shows that opinions in CY and SI varied more with more respondents answering “very much” and “not at all”; however, these more opinionated responses tended to balance each other out. Respondents from EE, RO and MT viewed the increase positively. As for **private providers**⁵⁸⁶, the most positive opinions were expressed in BE, RO, SI, CY, while those in FI and MT expressed neutral opinions and EE proved to have a negative view.

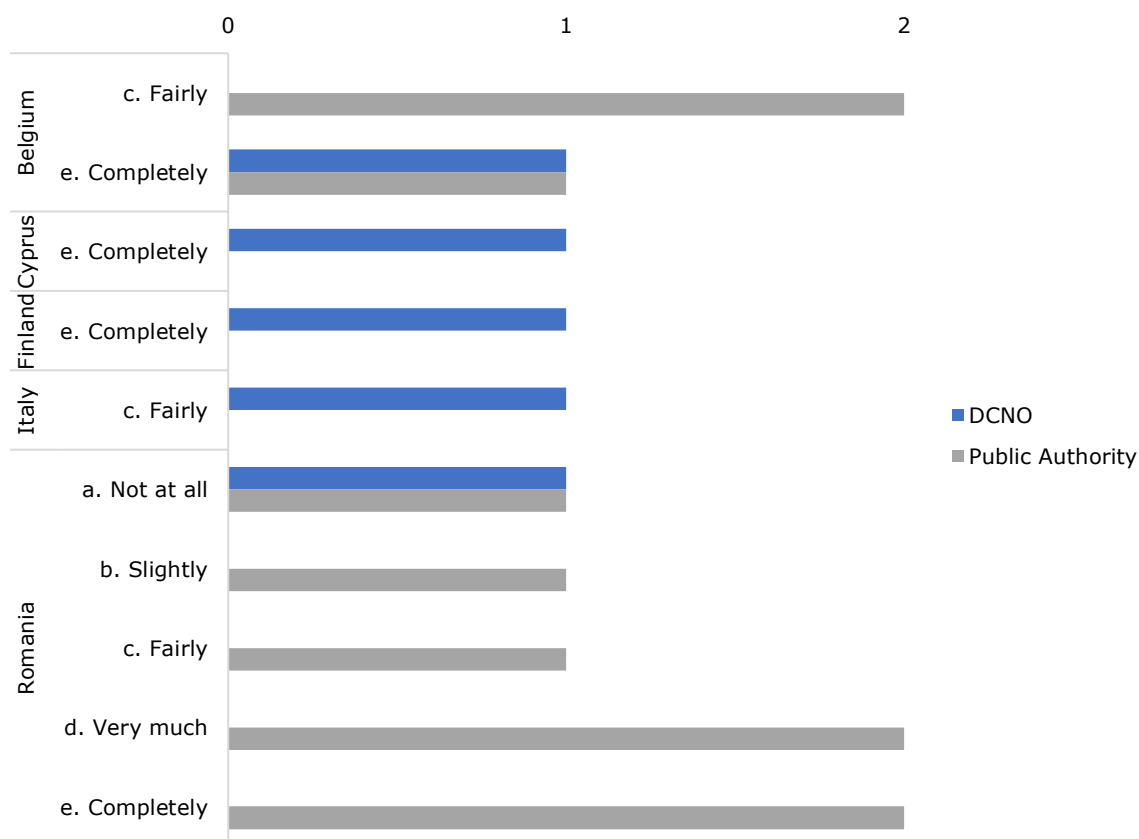
Figure 56 - Extent to which the Card contributed to increasing participation and mobility according to persons with disabilities



As depicted in Figure 56, the view of persons with disabilities on the Card’s role in enhancing participation in cultural and sporting events and mobility for touristic activities across Member States was mainly neutral if not negative.

⁵⁸⁶ Survey question 120. No information provided for IT. BE: DCNO, 1 PA. CY: DCNO, 1 CSO, 1 SP. EE: 1 CSO. FI: DCNO, 1 CSO. MT: DCNO, 1 SP. RO: DCNO, 13 PA, 1 CSO, 1 SP.

Figure 57 – Cooperation among the authorities involved in the management of the Card



However, the Card was deemed to have increased the number of persons with disabilities **accessing provided services** in BE, CY, and EE⁵⁸⁷. On the contrary, it seems to have limited impact on the access to services for persons without disabilities⁵⁸⁸.

The Card also represented an opportunity to enhance **cooperation among authorities** involved in the management of the Card⁵⁸⁹. In most cases, cooperation focused on sharing of information during the implementation phase of the Card (BE, CY, FI, IT, RO). Public Authorities in FI were, however, less convinced of the Card’s positive effect in that regard. Authorities also cooperated on financial contributions (BE, CY, FI) and observance of deadlines (BE, CY, FI, RO). As far as MT is concerned, there was no cooperation between public authorities because only the DCNO worked on implementing the Card.

Examples of cooperation⁵⁹⁰ include collaboration among BE local public authorities to share information, the high level of participation of CY authorities in implementation meetings, and the cooperation between the Steering Group and the Finnish Disability Forum to take relevant decisions in FI. In RO, the DCNO collaborates with the General Directorates of social assistance and child protection across the counties and in the

⁵⁸⁷ Survey question 122. No information provided for EE, FI, IT, MT. BE: DCNO. CY: DCNO, 1 CSO, 1 SP. RO: DCNO, 16 PA, 1 CSO, 2 SP.

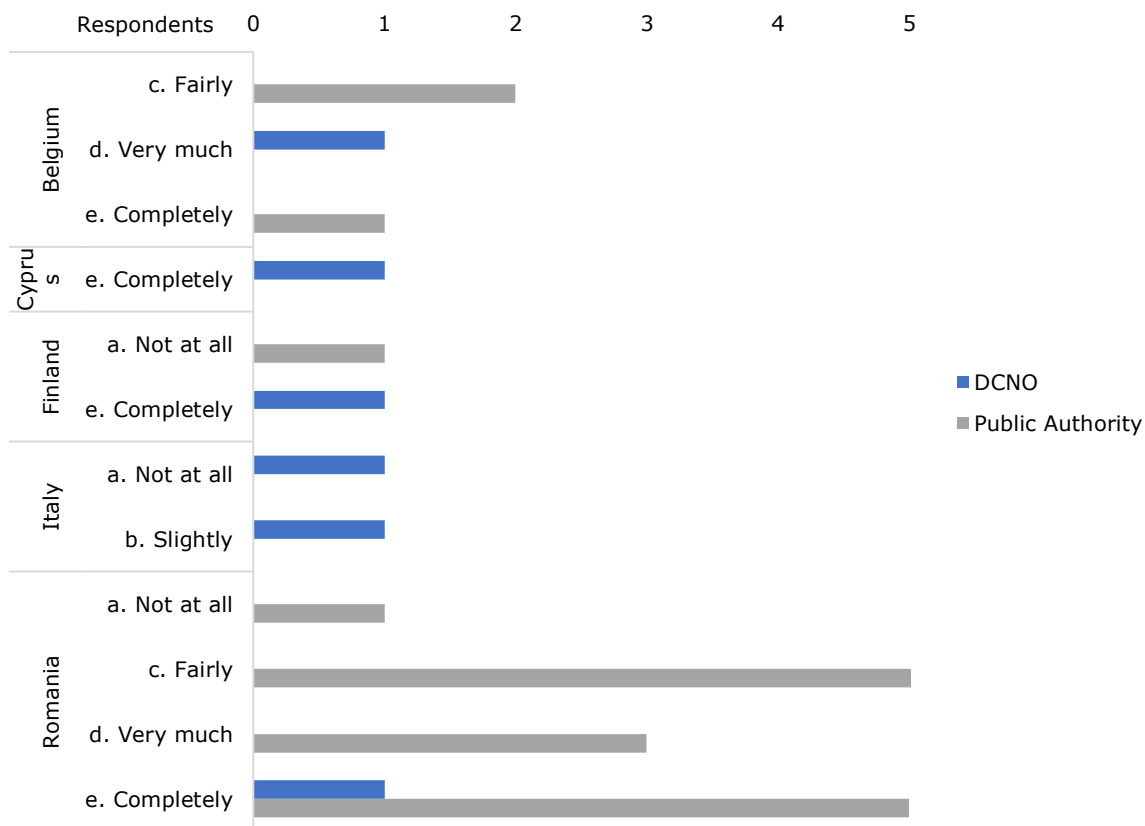
⁵⁸⁸ Survey question 122. No information provided for EE, FI, IT, MT. BE: DCNO. CY: DCNO, 1 CSO, 1 SP. RO: DCNO, 16 PA, 1 CSO, 2 SP.

⁵⁸⁹ Survey question 70. No information provided for EE, MT, SI. BE: DCNO, 1 PA. CY: DCNO. FI: DCNO, 1 PA. IT: DCNO. RO: DCNO, 16 PA.

⁵⁹⁰ Survey question 72. No information provided for EE, IT, MT, SI. BE: DCNO, 1 PA. CY: DCNO. FI: DCNO. RO: DCNO, 9 PA.

municipalities of Bucharest and, the Card increased public cooperation to attract service providers.

Figure 58 - Observance of deadlines



In terms of **good practices**⁵⁹¹ adopted in the Member States, the DCNOs reported the following:

- Involvement of civil society for the implementation of the Card (BE);
- Mainstreaming of disability in the fields of culture, leisure and sport (BE);
- Strengthening of collaboration between authorities (BE);
- Possibility to submit the application of both persons with disabilities and service providers directly on the Card national website (MT, SI).

Good practices reported by the PAs include:

- The importance of including leisure activities in the national package of benefits (BE);
- The coverage of a wide range of benefits (RO).

Good practices reported by the CSOs include:

⁵⁹¹ Survey question 127. BE: DCNO, 1 PA, 2 CSO, 1 SP. CY: 3 CSO. EE: 2 CSO, 1 SP. FI: 1 CSO. IT: 1 CSO. MT: DCNO, 1 CSO, 1 SP. RO: DCNO, 6 PA, 2 CSO. SI: 2 CSO.

- The provision of fare reductions on public transportation (CY, FI);
- Awareness-raising activities carried out by local public authorities (BE);
- The development of mobile applications (SI).

Only in RO were there cases of complaints reported by persons with disabilities from a country not participating in the Card project who were refused access to benefits since they did not have the Card⁵⁹².

The main **problems related to the Card**⁵⁹³ reported by the DCNO are the following:

- Lack of awareness of benefits, also sometimes on the part of service providers (BE, RO);
- Misunderstanding by the beneficiaries concerning the benefits provided (CY);
- Finding the proper supplier for the production of the Card in terms of costs and services provided (braille dots on the Card) (MT).

From the PA:

- Again, lack of awareness of the Card's existence and related benefits both by potential users and service providers (BE);
- The geographical area covered by the Card (RO);
- Lack of access to computers and internet to apply for the Card online (RO).

From the CSO:

- Lack of information due to poorly executed awareness-raising campaigns (RO, EE, BE, FI);
- Low quantity or lack of service providers (BE, SI, FI);
- Danger of increased segregation of persons with disabilities (FI);
- Strict eligibility criteria (FI).

The **areas for improvement**⁵⁹⁴ that the DNCOs reported for extending the Card across the EU are:

- Increasing awareness of service providers and persons with disabilities on the Card (BE, SI);
- Increasing the number of benefits provided (CY);
- Increasing cooperation between Member States implementing the Card (FI);
- Harmonising benefits across Member States implementing the Card (MT).

⁵⁹² Survey 128. No information provided for SI. BE: DCNO, 1 PA, 1 SP. CY: DCNO, 2 SP. EE: 1 SP. MT: DCNO, 2 SP. RO: DCNO, 11 PA, 1 SP.

⁵⁹³ Survey question 129. BE: DCNO, 2 PA, 4 CSOs, 1 SP. CY: DCNO, 2 CSOs, 1 SP. EE: 2 CSOs, 1 SP. FI: 5 CSOs. IT: 1 CSO. MT: DCNO, 1 SP. RO: DCNO, 7 PA, 2 CSOs. SI: 2 CSOs.

⁵⁹⁴ Survey question 130. BE: DCNO, 2 PAs, 8 CSOs, 2 SPs. CY: DCNO, 5 CSOs. EE: 4 CSOs, 2 SPs. FI: DCNO, 3 CSOs. IT: 3 CSOs. MT: DCNO, 4 CSOs, 2 SPs. RO: DCNO, 13 PAs, 3 CSOs, 1 SP. SI: 4 CSOs.

From the PA:

- Increasing the role of the Disability High-Level Group (DHLG) in convincing Member States to participate in the Card's scheme (BE);
- Improving the spread of information and awareness (BE);
- Increasing the number of service providers to include public transport as well (RO);
- Increasing collaboration with private providers of artistic events (RO).

From the CSO:

- Increasing the awareness of service providers as regards the Card's use (CY);
- Raising awareness and involving all stakeholders (MT, SI);
- Better advertising of services that are accessible to people with disabilities and which accept the Card (CY);
- Increasing cooperation between business, government and disability organisations (EE);
- Developing an all-European website and mobile application for awareness-raising and incentives for offering benefits (SI);
- Harmonising criteria for assistants to be covered through the Card so that service providers are aware that they have to provide services and benefits also to them (FI).

Moreover, the DCNOs reported that, in order to increase the cross-border mobility of persons with disabilities⁵⁹⁵, more Member States should participate in the project (BE, SI) and travel agencies should be included as service providers (CY). The DCNO from SI suggests that the Card should be established as an Erasmus student Card, hence available in all Member States. The Public Authorities again suggested the inclusion of public transport, increased advertisement and extension to other Member States (RO). The CSOs suggested a legislative agreement between Member States (RO, BE), standardised and updated pictograms overcoming language barriers (SI) and more accessibility as well as data exchange (EE).

Division of tasks and responsibilities

The FPS is in charge of leading the Card project and it is responsible for coordinating the different actors involved in the Steering Committee. The FPS is also the contact point for the Steering Committee at the European level, collaborating and communicating with the Commission and the other Member States. Currently, the FPS coordinates the activities of the four institutions in the field of disability to ensure the effective functioning of the Card. The other four public institutions in the field of disability represent their regions of competencies, and notably:

- Service Phare for the Brussels - Capital Region
- AViQ for the Walloon Region
- VAPH for the Flemish Region
- DSL for the German-speaking Community

⁵⁹⁵ Survey question 131. BE: DCNO, 1 PA, 4 CSO, 1 SP. CY: DCNO, 2 CSO. EE: 2 CSO, 1 SP. FI: 1 CSO. IT: 2 CSO. MT: DCNO, 1 CSO, 1 SP. RO: DCNO, 5 PA, 2 CSO, 1 SP. SI: 2 CSO.

The CBSS plays a technical and functional role, responsible for managing the data exchanges between the institutions through regional Crossroad Banks.

Rationale to outsource the production and delivery of the EU Disability Card to a private entity

As for the involvement of the private entity responsible for the production of the Card, the Steering Committee followed what was already done for the EU Parking Card⁵⁹⁶. Since the Steering Committee did not have the means for producing the Card, it was decided to outsource the production and delivery of the Card to a private entity. Thus, the DCNO launched a public tender, Multi-Post participated and won; hence it is the entity responsible for the production of the Card for a period of three years that was then extended for other two years. The timing extension did not require any other public tender as it was already foreseen within the first agreement.

Type and frequency of cooperation activities between the members

The Steering Committee organises monthly meetings throughout duration of the project, especially during the inception phase of the pilot project, prior to the launch of the Card. The strong cooperation already in place between the members of the Steering Committee facilitated the functioning of the Steering Committee itself. The previous experiences between the bodies in the field of disability was key to the success of the Card project. In particular, the FPS played a crucial role in establishing the Steering Committee in a short time span in order to respond to the EU Call for the Card system⁵⁹⁷. The longstanding and structured cooperation between the institutions and relative trust made the arrangements between bodies possible and successful.

Since the beginning of the Card project, the collaboration between the five institutions was approved by the five ministries in the field of disability which are responsible for determining the financial sustainability of the Card. An agreement was signed by the five institutions related to i) the share of funding contributed by each institution and ii) the funding for the production and delivery of the Card.

The Card's sustainability over the long term is ensured thanks to the use of national resources and budgets to fund the Card's scheme.

There is no statistical evidence available to quantify the number of service providers participating in the Card. Moreover, it is difficult to establish whether there was an increase in service providers offering benefits to persons with disabilities in Belgium after the introduction of the Card. Despite this general lack of statistics and monitoring data, the feedback provided by the members of the Steering Committee with respect to the impact of the Card is positive. Notably:

- In the Flemish Region, there is significant participation of service providers in the Card system. After two years after the launch of the Card, there is a capillary involvement of service providers. In particular, out of 300 Flemish communities, service providers from around 50 communities participate in the Card's scheme. Moreover, there is an increasing demand from the service providers to receive promotional material to advertise the Card.

⁵⁹⁶ https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/belgium/index_en.htm

⁵⁹⁷ <https://ec.europa.eu/social/main.jsp?catId=629&langId=en&callId=456&furtherCalls=yes>

- In the Walloon Region, there is no direct contact with the service providers involved in the Card. Therefore, it is not known if the service providers participating in the Card system already provided benefits to persons with disabilities, and if there was an increase in service providers offering benefits. However, there is a continued demand by service providers to participate in the Card's scheme. Moreover, AViQ is directly committed to ensuring the growth of the number of service providers acknowledging the Card through the organisation of events, particularly in the tourism and sport sectors.
- In the German-speaking Community, all the major service providers in the sectors of culture, leisure and sport were reached and currently participate in the Card. Most of the service providers involved already offered benefits to persons with disabilities prior to the introduction of the Card and subsequently joined the Card's scheme. Most recently, the local football club league became a partner of the Card.

There is no planning for a monitoring system on the number of service providers participating in the Card system. According to Multi-Post, a unique way for ensuring a monitoring system of the Card's use would be to have an electronic format of the Card that registers where the Card is used. By doing so, it would be possible to link the usage of the Card with the service provider where the Card is used.

The Steering Committee collaborated with the aim of facilitating the application to the Card by ensuring that any of the five public institutions in the field of disability can manage the applications. In Belgium, the focus is not only on providing price reductions on the services accessed by the person with disability, but also facilitating accessibility to promote the social inclusion of persons with disabilities.

Another important aspect of the Belgian Card system is the involvement of civil society organisations from the beginning of the project to receive feedbacks from their side on the challenges identified by the Steering Committee. The Steering Committee developed a brochure with information about the types of benefits that could be offered to persons with disabilities, including accessibility services. The brochure was shared with relevant civil society organisations. Moreover, the civil society organisations indicated some of the service providers that the Steering Committee could start contacting.

16.3.3. Online survey: second round

Survey of persons with disabilities

Methodological Note

This analysis integrates the responses received from persons with disabilities and service providers, therefore allows assessing the effects of the Card from both of the perspectives. The number of each survey question is specified in the footnotes.

Only four Cardholders from Slovenia replied to the survey, thus their answers are not reported when stratifying the responses per country, as these numbers do not allow the reporting of percentages and cannot be representative of persons with disabilities in Slovenia. Therefore, to avoid biased answers from SI, for the analyses including all Member States, the answers from Slovenia are always excluded. In order to make the figures more reliable reflectors of the current situation, when showing the answers for all respondents, a

weighting system has been applied, based on the current number of Cardholders per each Member State. This means that even if 44 persons from Belgium have responded to the survey, BE Cardholders represent 65% of the Cardholder population across Member States, their answers are “enlarged” to have more weight in the summarised findings. Similarly, the 136 answers from Malta are downsized, as Maltese Cardholders represent only 9.6% of the Cardholders population. In case less than two answers were collected, the information is reported as “other answers with less than two respondents per answer”.

Scope of the analysis

The survey among Cardholders reached a sample of 368 participants, a far higher response rate than in the first round of survey. 239 replied on their own, 49 with the help of a friend/relative or their assistant, while 80 replied with the help of their associations for persons with disabilities⁵⁹⁸. Table 85 below reports the number of observations by the main socio-economic characteristics. The respondents’ sample is equally divided into male and females, making the male gender slightly overrepresented, since we know that women more often report living with a disability⁵⁹⁹. Respectively 17.2% of the sample is below 35 years old and 19.8% over 65. These two categories are usually harder to reach due to their less frequent participation into DPOs for the former, and more severe types of disabilities as well as less acquaintance with ICT tools for the latter.

Looking at the highest educational level attained, the majority of respondents (52.9%) have at most a high school degree, whereas 35.9% have a university degree. These numbers clearly point to an overrepresentation of tertiary education graduates, given the known difficulties of access to education for persons with disabilities.

39% of respondents report being employed, whereas 37% report being retired or pensioner. Another 7.3% are out of the labour force and 3.4% are unemployed. Only 1.2% are self-employed, and 3% are studying or in training. Among the employed, most conduct a skilled non-manual job (40.8%) or cover a managerial position (39.5%).

Table 85 - Socio-economic characteristics⁶⁰⁰

Variable		Observations
Country	Malta	136
	Romania	107
	Finland	47
	Belgium	44
	Cyprus	30
	Slovenia	4
Gender	Female	184
	Male	183
	Genderqueer/Non-binary	1
Age	50-64	128
	35-49	96

⁵⁹⁸ Question 2.

⁵⁹⁹ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Infographic_Disability_statistics_final.png based on EU-SILC 2011 ad hoc module on employment of persons with disabilities.

⁶⁰⁰ Questions 3-9.

Variable		Observations
	65 or older	76
	18-34	66
	Prefer not to say	2
Education	High school or less	203
	University degree or equivalent	138
	Prefer not to say	27
Employment status	Employed	152
	Retired/pensioner	143
	Not working nor looking for a job (i.e. not in the labour force)	28
	Not working and looking for a job (i.e. unemployed)	13
	Prefer not to say	12
	Student or in training	12
Employment type	Self-employed	8
	Clerk or skilled non-manual job (head of office, bank teller, payroll officer, graduated hospital nurse, schoolteacher, etc.)	62
	Managerial, professional, higher technical, and higher administrative job	60
	Skilled manual worker (carpenter, mechanic, locksmith, plumber, electrician, driver etc.)	14
	Prefer not to say	10
	Unskilled non-manual worker (shop assistants, bar tender, waiter, etc.)	4
Self-employment type	Unskilled manual workers (janitor, housekeeper, farmhand, labourer, sweeper, delivery man, etc.)	2
	Self-employed/small entrepreneur (less than 14 employees): carpenter, motor vehicle mechanic, retailer, farmer, fisher, livestock producer, etc.	6
	Prefer not to say	1
	Professional (notary, architect, general practitioner, etc.)	1

Main Results

The application process

Regarding the application process, most persons with disabilities (63.9%) discovered about the Card from a CSO, only 11% were directly invited to apply for the Card, and almost 13% received the advertisements on the TV, radio or on the internet (Table 86). As reason provided for applying, more than the Card benefits (44.3%), most pointed out that the Card is an official EU document certifying their impairment.

The application process is mainly (44.3%) regarded as fairly user-friendly, and 40.5% consider it very user-friendly.

Table 86 - Application process⁶⁰¹

Variable		%
How did you find out about the Card?	From an Association representing persons with disabilities	63.9%
	Advertisements on TV, radio, Internet etc.	12.8%
	From a friend/relative	10.3%
	Direct invitation from a national authority	8.4%
	From other associations working in the social sector	6.2%
	From other professionals working with persons with disabilities	5.4%
	Direct invitation from a regional/local authority	3%
	Prefer not to say	0.3%
Why did you apply?	Because it is an official EU document certifying my impairment	61.1%
	Because of the Card benefits	44.3%
	I have heard about good user experience regarding the Card	9.2%
	I found the Card useful for my family members/friends	7.9%
	I got the Card because my acquaintances also applied	5.7%
Found the application process user friendly?	Fairly user-friendly	44.3%
	Very user-friendly	40.5%
	Slightly user-friendly	12.2%
	Not at all	3%

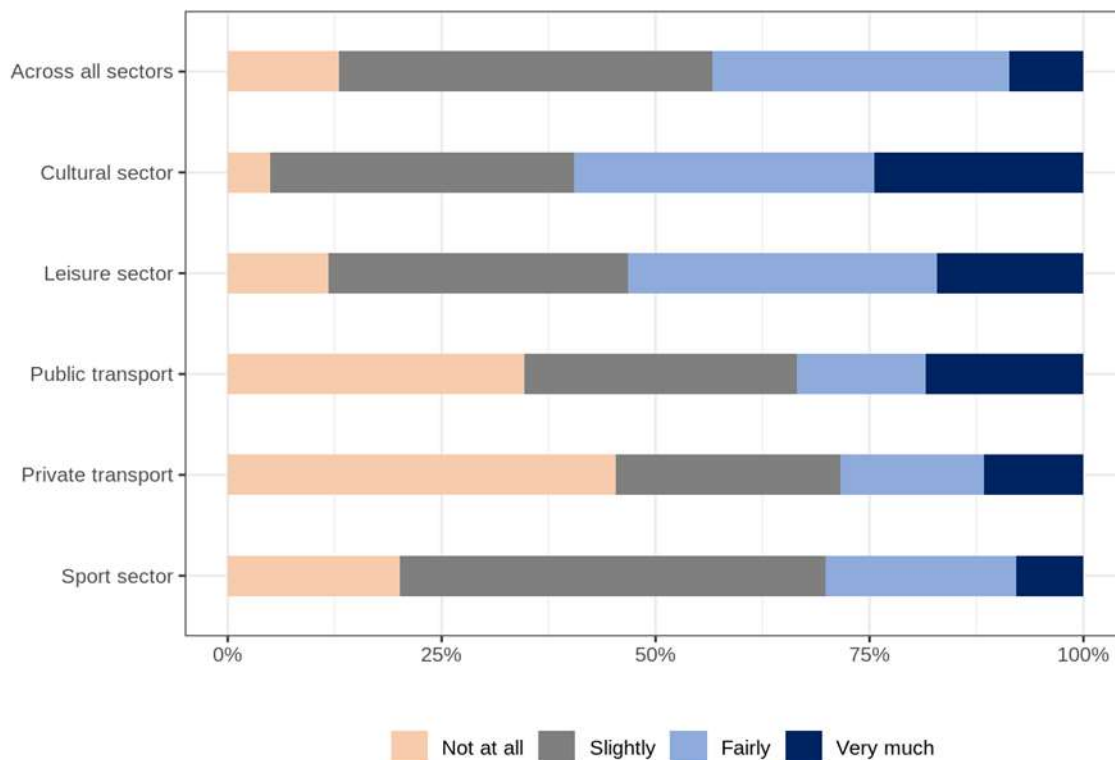
Coverage of the benefits and services

Figure 59 illustrates to what extent, according to persons with disabilities, current benefits/services respond well to their needs within and across different sectors. Culture is the sector covering better the needs of persons with disabilities, followed by leisure, sport, public transport and private transport. Overall, the transport sector is the least covered in most Member States.

Figure 59 - Extent to which the number of benefits/services cover the needs of persons with disabilities by sector, across Member States⁶⁰²

⁶⁰¹ Questions 10-12.

⁶⁰² Question 14.



When the needs coverage is stratified also by Member State (Figure 60, Table 87), the shortcomings in the transport sector are mainly criticised in Member States not covering this sector. For instance, in BE, 38.6% of respondents report that public transport does not cover current needs at all, with this rate rising to 47.7% when it comes to private transport. Similarly, in RO, 33.6% of respondents assign to public transport the lowest coverage score, and 52.3% associate it with private transport⁶⁰³. Across the participating Member States, private transport is consistently reported to cover the needs of persons with disabilities less than public transport.

The cultural sector received more positive feedbacks from survey respondents, with 56% fairly or very much satisfied in BE, 60% in CY, 63.5% in RO, and around 70% in FI and MT. The leisure sector is considered sufficiently covered (the top two categories) by at least 50% of respondents in all Member States but CY (40%).

The sport sector is very similarly evaluated in CY, MT, and RO, with around 50% of respondents satisfied with its coverage, whereas 22.7% of BE Cardholders and 44.7% of FI Cardholders are sufficiently satisfied.

⁶⁰³ BE and RO are the two Member States where neither the public nor the private transport sector is covered.

Figure 60 - Extent to which the number of service providers recruited cover the needs of persons with disabilities by Member State and sector⁶⁰⁴

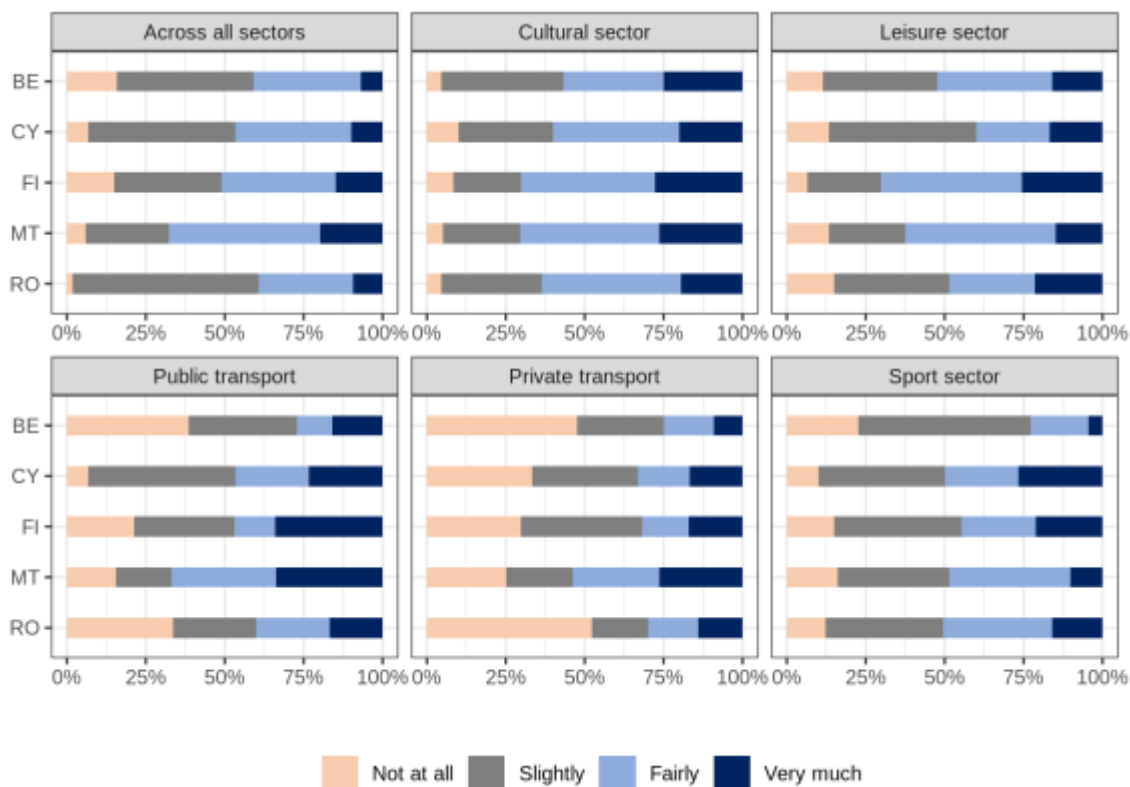


Table 87 - Extent to which the number of service providers recruited cover the needs of persons with disabilities by Member State and sector⁶⁰⁵

MS	Sector	Not at all	Slightly	Fairly	Very much
BE	Across sectors all	15.9%	43.2%	34.1%	6.8%
	Cultural sector	4.5%	38.6%	31.8%	25%
	Leisure sector	11.4%	36.4%	36.4%	15.9%
	Public transport	38.6%	34.1%	11.4%	15.9%
	Private transport	47.7%	27.3%	15.9%	9.1%
	Sport sector	22.7%	54.5%	18.2%	4.5%
CY	Across sectors all	6.7%	46.7%	36.7%	10%
	Cultural sector	10%	30%	40%	20%
	Leisure sector	13.3%	46.7%	23.3%	16.7%
	Public transport	6.7%	46.7%	23.3%	23.3%
	Private transport	33.3%	33.3%	16.7%	16.7%

⁶⁰⁴ Questions 14-15

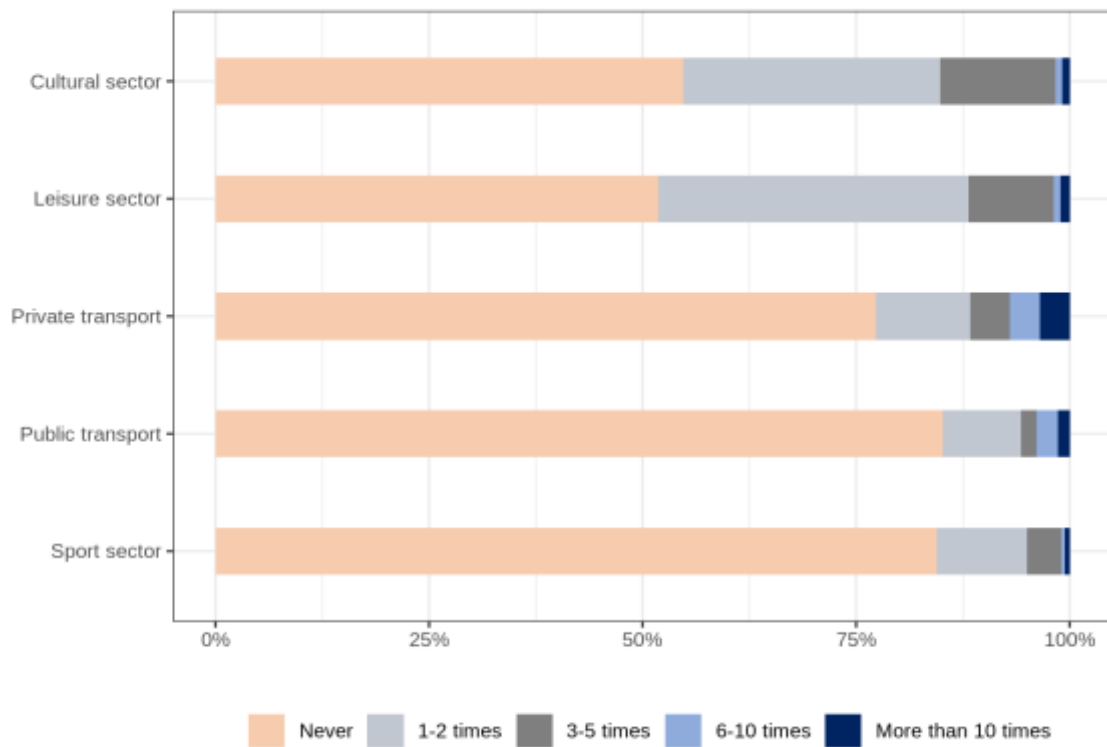
⁶⁰⁵ Questions 14-15

MS	Sector	Not at all	Slightly	Fairly	Very much
	Sport sector	10%	40%	23.3%	26.7%
FI	Across sectors all	14.9%	34%	36.2%	14.9%
	Cultural sector	8.5%	21.3%	42.6%	27.7%
	Leisure sector	6.4%	23.4%	44.7%	25.5%
	Public transport	21.3%	31.9%	12.8%	34%
	Private transport	29.8%	38.3%	14.9%	17%
	Sport sector	14.9%	40.4%	23.4%	21.3%
MT	Across sectors all	5.9%	26.5%	47.8%	19.9%
	Cultural sector	5.1%	24.3%	44.1%	26.5%
	Leisure sector	13.2%	24.3%	47.8%	14.7%
	Public transport	15.4%	17.6%	33.1%	33.8%
	Private transport	25%	21.3%	27.2%	26.5%
	Sport sector	16.2%	35.3%	38.2%	10.3%
RO	Across sectors all	1.9%	58.9%	29.9%	9.3%
	Cultural sector	4.7%	31.8%	43.9%	19.6%
	Leisure sector	15%	36.4%	27.1%	21.5%
	Public transport	33.6%	26.2%	23.4%	16.8%
	Private transport	52.3%	17.8%	15.9%	14%
	Sport sector	12.1%	37.4%	34.6%	15.9%

The use of the Card

In the prior 12 months, 45% of Cardholders used the Card for cultural activities, 48% in leisure activities, less than 25% for private transport, less than 20% for public transport or in the sport sector (Figure 61). Among those who use the Card, most have used it once or twice in the past 12 months.

Figure 61 - Card use in the prior 12 months across Member States, by sector⁶⁰⁶



In the culture and leisure sectors, the use of the Card is similar in the various Member States, below 50% in culture and around 40% in leisure. In FI it is higher, in line with the higher cultural participation, even among persons with disabilities, observed in FI as compared with other Member States (Figure 62, Table 88)⁶⁰⁷. In the private transport sector, respondents in FI, MT, and RO reported the highest use of the Card, whereas MT is the Member State with most reported Card uses in public transport. The Member State with highest Card use in the sport sector is FI, followed by RO and CY. When all sectors are considered together, it is possible to check if respondents used the Card at least once in any of the sectors in scope. The survey results show that 63.6% of respondents in BE used the Card at least once in the past 12 months, 66.7% in CY, 89.4% in FI, 75.7% in MT, and 68.2% in RO.

⁶⁰⁶ Question 18

⁶⁰⁷ See interim report, table 19 "Participation in cultural activities at least once in the previous 12 months at 2015" and table 20 "Practising sport, fitness or leisure physical activities, in 2014".

Figure 62 - Card use in the prior 12 months, by sector and Member State⁶⁰⁸

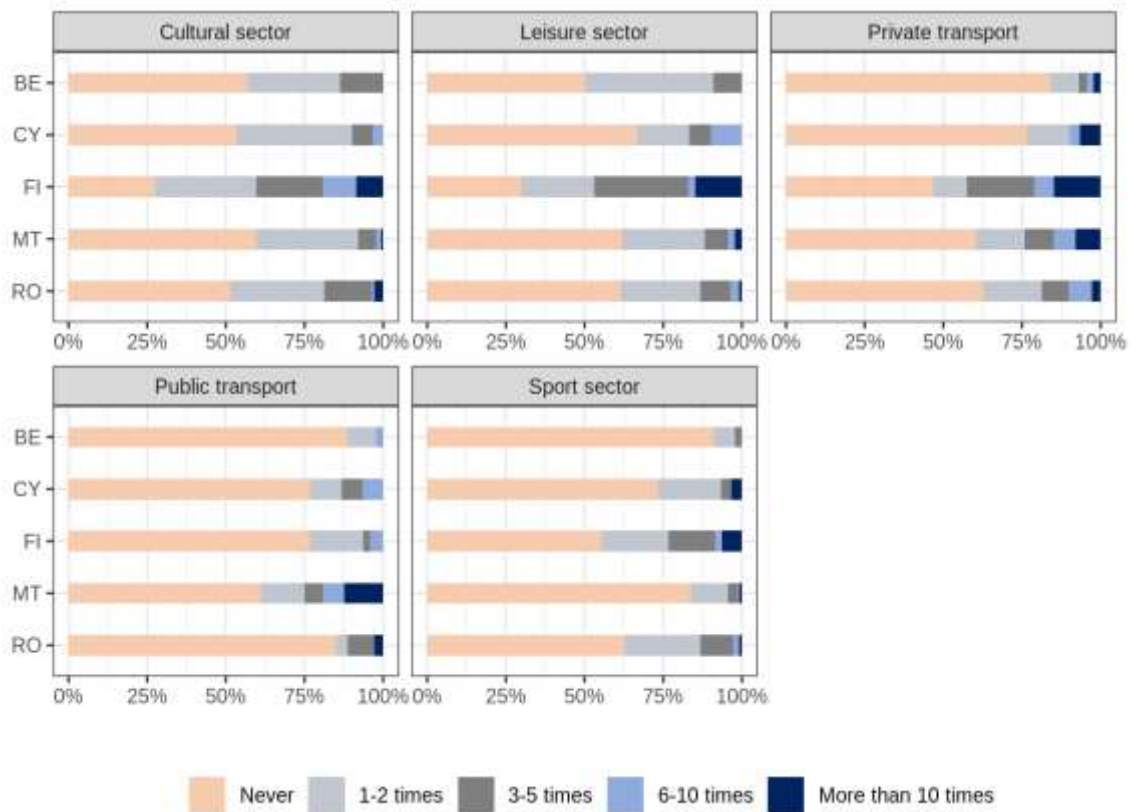


Table 88 - Card use in the prior 12 months, by sector and Member State⁶⁰⁹

MS	Sector	Never	1-2 times	3-5 times	6-10 times	More than 10 times
BE	Cultural sector	56.8%	29.5%	13.6%	0%	0%
	Leisure sector	50%	40.9%	9.1%	0%	0%
	Private transport	84.1%	9.1%	2.3%	2.3%	2.3%
	Public transport	88.6%	9.1%	0%	2.3%	0%
	Sport sector	90.9%	6.8%	2.3%	0%	0%
CY	Cultural sector	53.3%	36.7%	6.7%	3.3%	0%
	Leisure sector	66.7%	16.7%	6.7%	10%	0%
	Private transport	76.7%	13.3%	0%	3.3%	6.7%
	Public transport	76.7%	10%	6.7%	6.7%	0%
	Sport sector	73.3%	20%	3.3%	0%	3.3%

⁶⁰⁸ Question 18.

⁶⁰⁹ Question 18.

MS	Sector	Never	1-2 times	3-5 times	6-10 times	More than 10 times
FI	Cultural sector	27.7%	31.9%	21.3%	10.6%	8.5%
	Leisure sector	29.8%	23.4%	29.8%	2.1%	14.9%
	Private transport	46.8%	10.6%	21.3%	6.4%	14.9%
	Public transport	76.6%	17%	2.1%	4.3%	0%
	Sport sector	55.3%	21.3%	14.9%	2.1%	6.4%
MT	Cultural sector	59.6%	32.4%	5.9%	1.5%	0.7%
	Leisure sector	61.8%	26.5%	7.4%	2.2%	2.2%
	Private transport	60.3%	15.4%	9.6%	6.6%	8.1%
	Public transport	61%	14%	5.9%	6.6%	12.5%
	Sport sector	83.8%	11.8%	2.9%	0.7%	0.7%
RO	Cultural sector	51.4%	29.9%	15%	0.9%	2.8%
	Leisure sector	61.7%	25.2%	9.3%	2.8%	0.9%
	Private transport	62.6%	18.7%	8.4%	7.5%	2.8%
	Public transport	85%	3.7%	8.4%	0%	2.8%
	Sport sector	62.6%	24.3%	10.3%	1.9%	0.9%

The Card's effects

Around 37% report that their cultural participation did not increase at all thanks to the Card, with another 30% reporting it increased only slightly (Figure 63). Cardholders consider more positively the changes in cultural participation of their fellow citizens with disabilities and of foreigners with disabilities. Sport participation is the item which experienced less changes due to the Card, with more than 60% reporting no change occurred and only 15% reporting it increased fairly or very much.

Touristic activities were reported to have changed at least slightly by 55% of the Cardholders. Even in this case, opinions on fellow citizens or foreigners with disabilities are more positive, with more than 75% reporting at least a slight increase in tourism abroad.

Figure 63 - Effects of the Card across Member States, on cultural and sport participation, and on tourism abroad⁶¹⁰

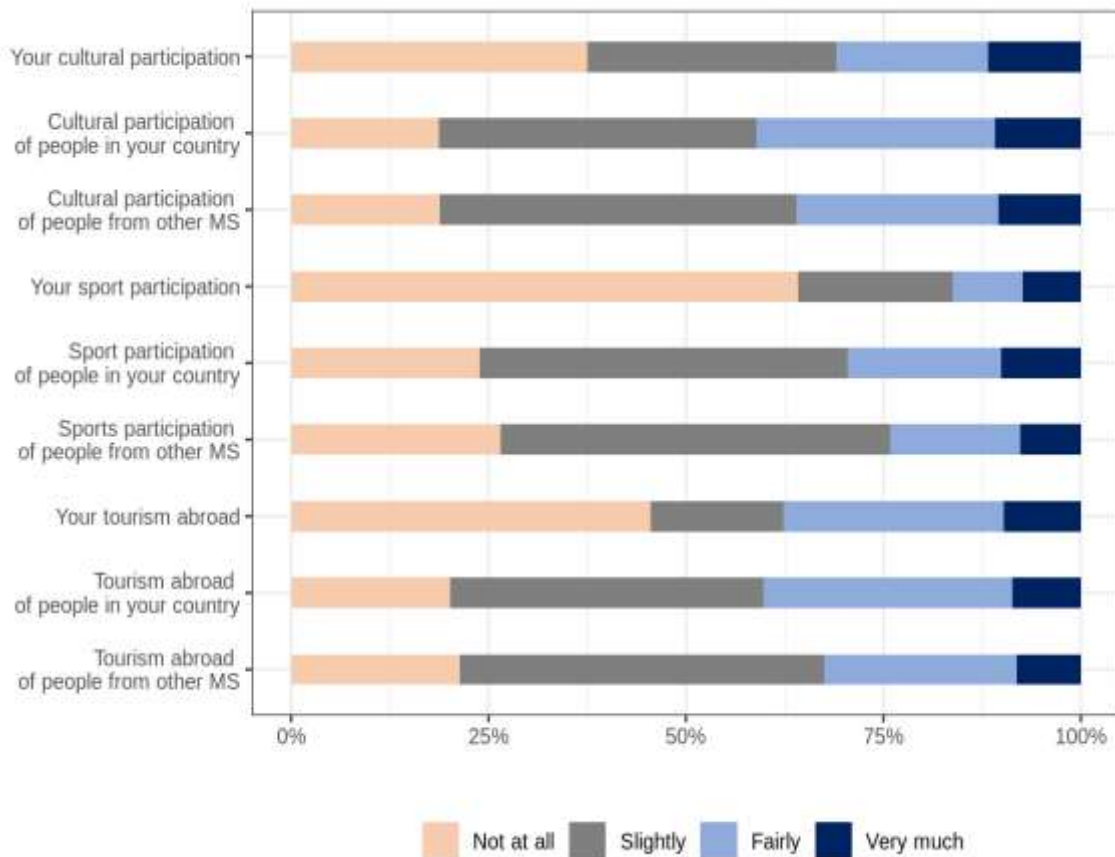


Figure 64 focuses the same question on the effects of the Card, also stratified by Member State. When examining the views of respondents on the increase in their personal participation, RO is the Member State where the biggest increases in participation occurred, followed by FI in the culture and sport sectors. In RO, around 75% believe to have increased their cultural participation and slightly less than 70% their sport participation and tourism abroad. In MT and CY more than 50% also increased their tourism abroad. Sport participation is the area that improved the least. The precise percentages are reported in Table 89.

⁶¹⁰ Question 18

Figure 64 - Effects of the Card on cultural and sport participation, and on tourism abroad, by Member State⁶¹¹

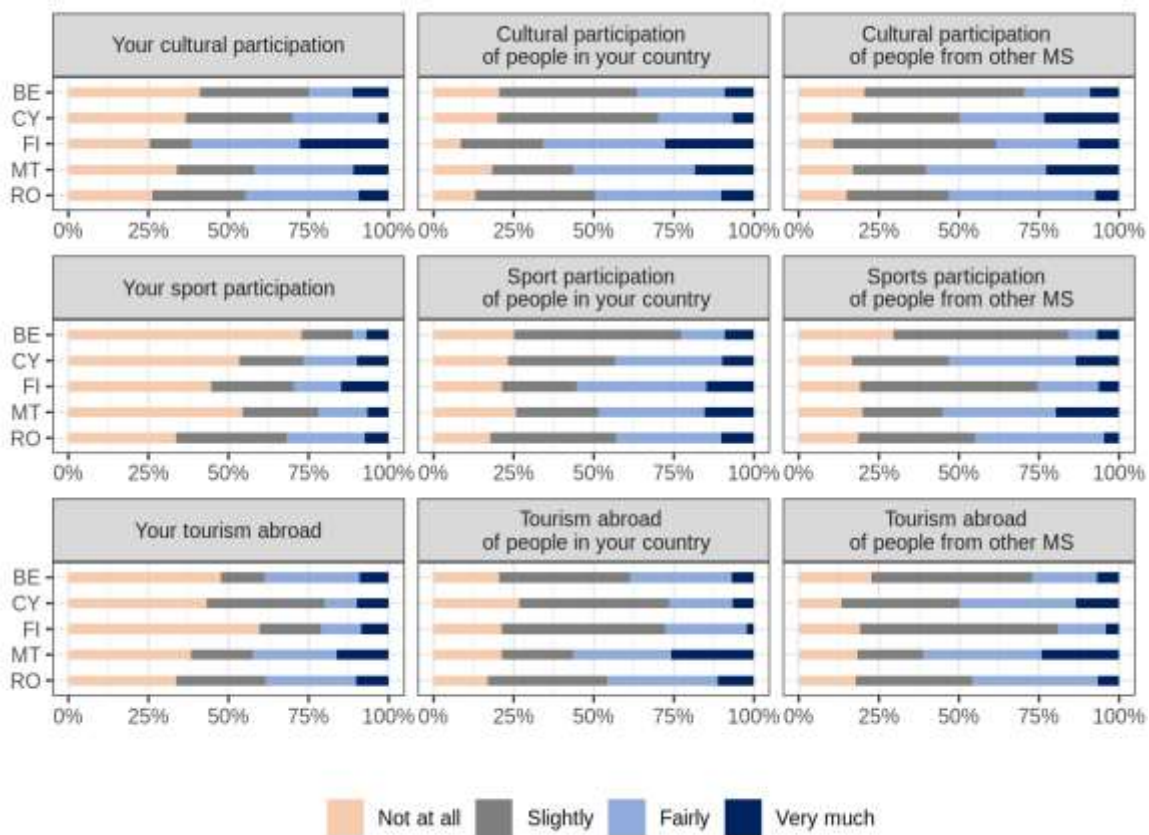


Table 89 - Effects of the Card on cultural and sport participation, and on tourism abroad, by Member State⁶¹²

MS	Sector	Not at all	Slightly	Fairly	Very much
BE	Your cultural participation	40.9%	34.1%	13.6%	11.4%
	Cultural participation of people in your country	20.5%	43.2%	27.3%	9.1%
	Cultural participation of people from other Member States	20.5%	50%	20.5%	9.1%
	Your sport participation	72.7%	15.9%	4.5%	6.8%
	Sport participation of people in your country	25%	52.3%	13.6%	9.1%
	Sports participation of people from	29.5%	54.5%	9.1%	6.8%

⁶¹¹ Question 18

⁶¹² Question 18

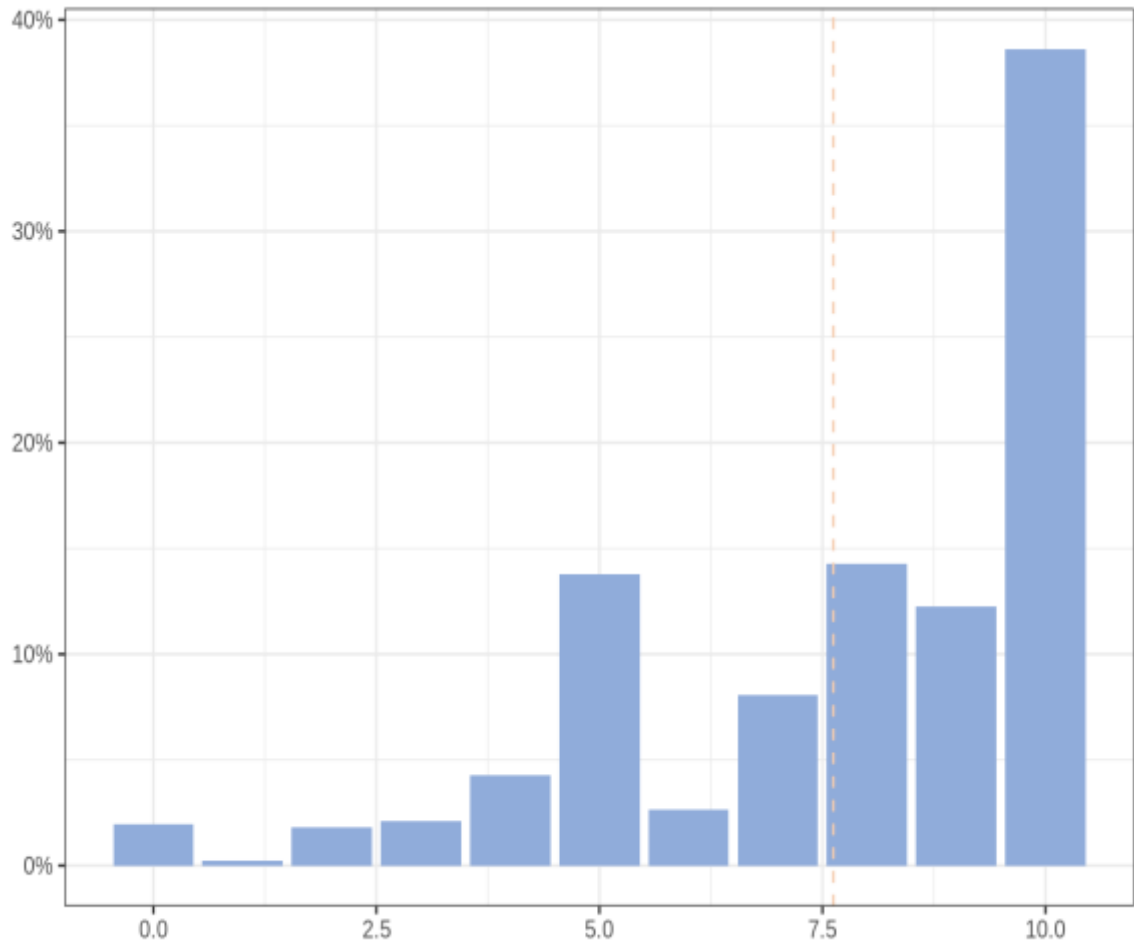
MS	Sector	Not at all	Slightly	Fairly	Very much
	other Member States				
	Your tourism abroad	47.7%	13.6%	29.5%	9.1%
	Tourism abroad of people in your country	20.5%	40.9%	31.8%	6.8%
	Tourism abroad of people from other Member States	22.7%	50%	20.5%	6.8%
CY	Your cultural participation	36.7%	33.3%	26.7%	3.3%
	Cultural participation of people in your country	20%	50%	23.3%	6.7%
	Cultural participation of people from other Member States	16.7%	33.3%	26.7%	23.3%
	Your sport participation	53.3%	20%	16.7%	10%
	Sport participation of people in your country	23.3%	33.3%	33.3%	10%
	Sports participation of people from other Member States	16.7%	30%	40%	13.3%
	Your tourism abroad	43.3%	36.7%	10%	10%
	Tourism abroad of people in your country	26.7%	46.7%	20%	6.7%
	Tourism abroad of people from other Member States	13.3%	36.7%	36.7%	13.3%
FI	Your cultural participation	25.5%	12.8%	34%	27.7%
	Cultural participation of people in your country	8.5%	25.5%	38.3%	27.7%
	Cultural participation of	10.6%	51.1%	25.5%	12.8%

MS	Sector	Not at all	Slightly	Fairly	Very much
	people from other Member States				
	Your sport participation	44.7%	25.5%	14.9%	14.9%
	Sport participation of people in your country	21.3%	23.4%	40.4%	14.9%
	Sports participation of people from other Member States	19.1%	55.3%	19.1%	6.4%
	Your tourism abroad	59.6%	19.1%	12.8%	8.5%
	Tourism abroad of people in your country	21.3%	51.1%	25.5%	2.1%
	Tourism abroad of people from other Member States	19.1%	61.7%	14.9%	4.3%
MT	Your cultural participation	33.8%	24.3%	30.9%	11%
	Cultural participation of people in your country	18.4%	25%	38.2%	18.4%
	Cultural participation of people from other Member States	16.9%	22.8%	37.5%	22.8%
	Your sport participation	54.4%	23.5%	15.4%	6.6%
	Sport participation of people in your country	25.7%	25.7%	33.1%	15.4%
	Sports participation of people from other Member States	19.9%	25%	35.3%	19.9%
	Your tourism abroad	38.2%	19.1%	26.5%	16.2%
	Tourism abroad of people in your country	21.3%	22.1%	30.9%	25.7%

MS	Sector	Not at all	Slightly	Fairly	Very much
	Tourism abroad of people from other Member States	18.4%	20.6%	36.8%	24.3%
RO	Your cultural participation	26.2%	29%	35.5%	9.3%
	Cultural participation of people in your country	13.1%	37.4%	39.3%	10.3%
	Cultural participation of people from other Member States	15%	31.8%	45.8%	7.5%
	Your sport participation	33.6%	34.6%	24.3%	7.5%
	Sport participation of people in your country	17.8%	39.3%	32.7%	10.3%
	Sports participation of people from other Member States	18.7%	36.4%	40.2%	4.7%
	Your tourism abroad	33.6%	28%	28%	10.3%
	Tourism abroad of people in your country	16.8%	37.4%	34.6%	11.2%
	Tourism abroad of people from other Member States	17.8%	36.4%	39.3%	6.5%

Respondents were asked how likely they were to recommend the Card to other users, on a scale from 0 to 10, with 10 being the best score. In Figure 65 the overall recommendation score is shown, with a dashed line representing the median value, whereas in Figure 66 the same question is stratified by Member State. The respondents are more satisfied with the Card in FI, followed by CY and MT. For these three Member States more than 50% of respondents report the maximum recommendation score. In RO the median recommendation score is 7.8, whereas in BE the median recommendation score reaches 7.4.

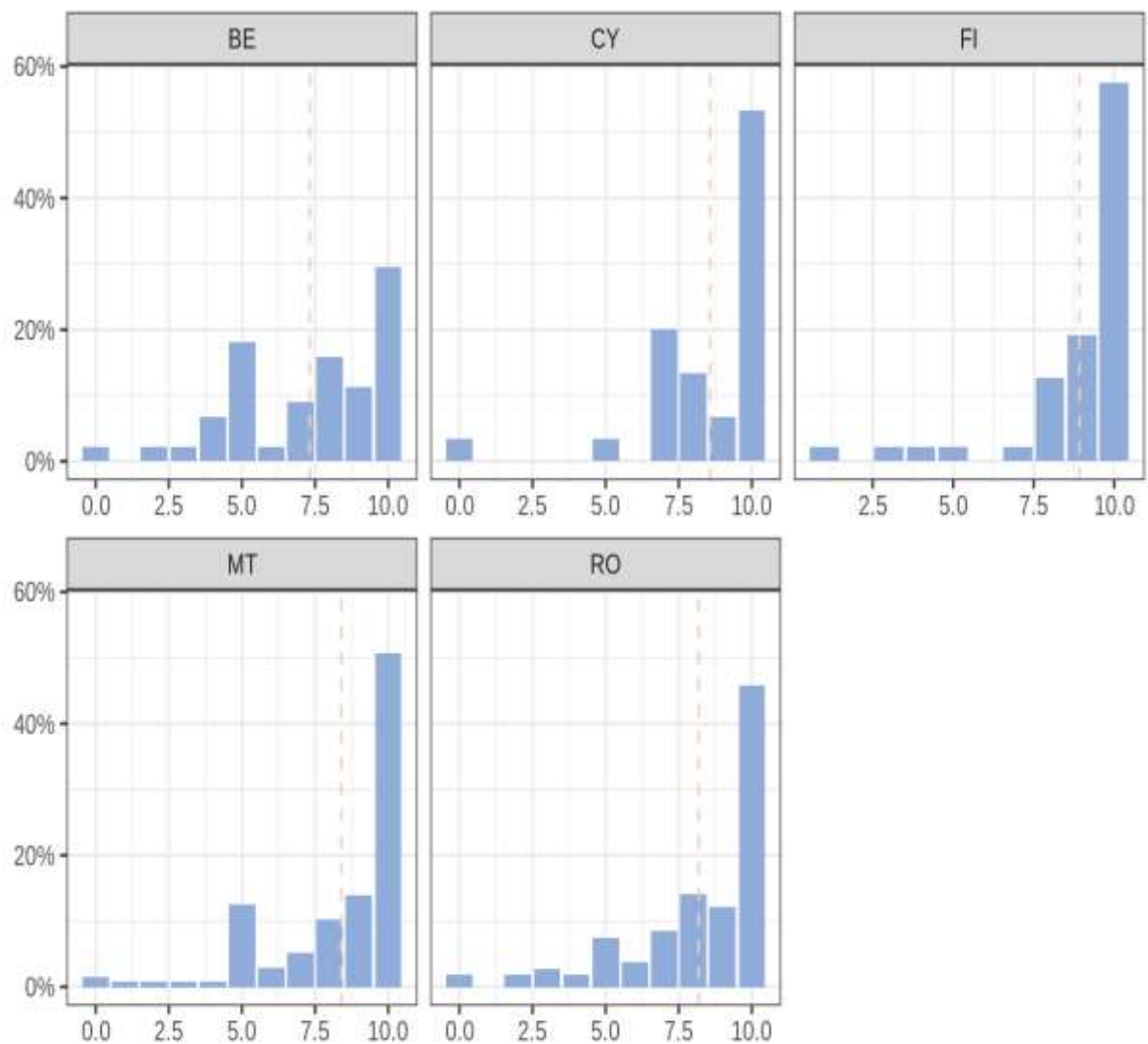
Figure 65 - Likelihood to recommend the Card to other users across Member States (0-10 scale)⁶¹³



The horizontal axis represents the score of being likely to recommend the Card, and the y-axis represents the weighted share of Cardholders assigning that specific score.

⁶¹³ Questions 19-21

Figure 66 - Likelihood to recommend the Card to other users, by Member State⁶¹⁴



Key needs yet to cover and main problems

Respondents were provided with possible key needs that might not be covered by current benefits and services⁶¹⁵. 64.7% reported the lack of transport from the covered sectors in their Member State, 28.6% complained about the absence of audio-guides specific for the blind/visually impaired, another 27.8% reported the lack of leaflets in Braille. 14.5% of respondents reported no key needs was not covered (Figure 67). The same question is reported also stratified by Member State (Figure 68, Table 90). For BE, CY, FI, and MT the main need not yet covered consist in the mobility need, that could be met by including the transport sector. In RO the main need reported is the need of leaflets in Braille.

Respondents were asked about possible key needs that might not be covered by current benefits and services⁶¹⁶. Nearly two thirds (64.7%) reported the lack of transport among the sectors covered in their Member State, 28.6% complained about the absence of audio-guides specific for the blind/visually impaired, another 27.8% reported the lack of leaflets in Braille, while 14.5% of respondents reported that there were no key needs not covered (Figure 67, , Table 90). The responses to the same question are also stratified by Member

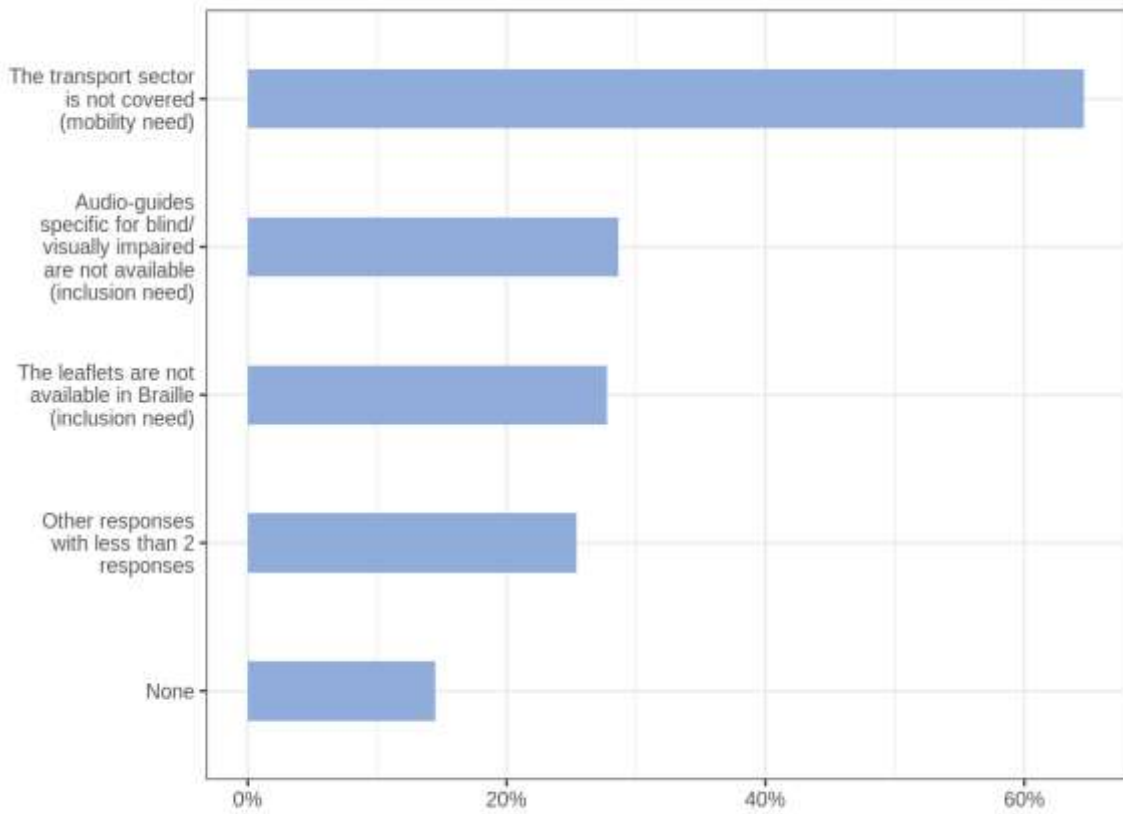
⁶¹⁴ Questions 19-21

⁶¹⁵ Question 22.

⁶¹⁶ Question 22.

State (Figure 68, Table 90). For BE, CY, FI, and MT the main need not yet covered related to mobility, which could be met by including the transport sector in the Card's scheme. In RO the main need reported is the need for leaflets in Braille.

Figure 67 - Key needs not covered by current benefits and services, across Member States⁶¹⁷



⁶¹⁷ Question 22.

Figure 68 - Key needs not covered by current benefits and services, by Member State⁶¹⁸

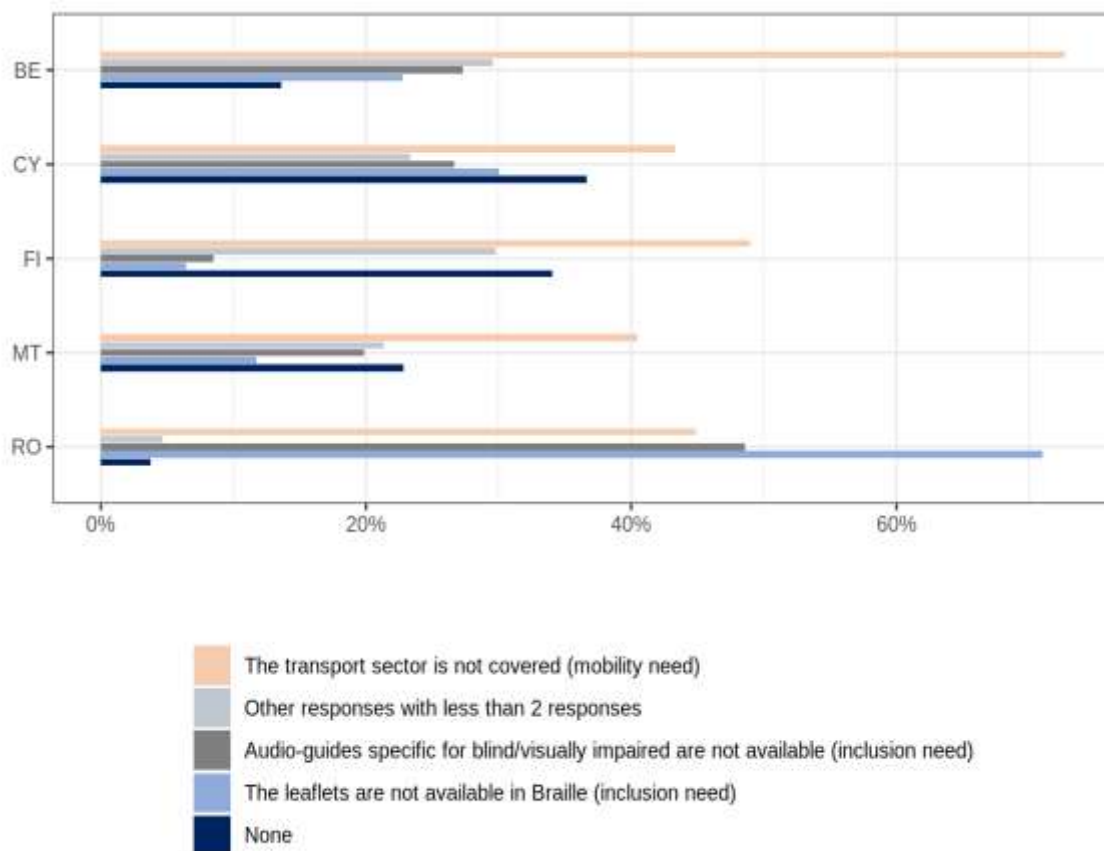


Table 90 - Key needs not covered by current benefits and services, by Member State⁶¹⁹

MS	Need	%
BE	The transport sector is not covered (mobility need)	72.7%
	Other responses with less than 2 responses	29.5%
	Audio-guides specific for blind/visually impaired are not available (inclusion need)	27.3%
	The leaflets are not available in Braille (inclusion need)	22.7%
	None	13.6%
CY	The transport sector is not covered (mobility need)	43.3%
	None	36.7%
	The leaflets are not available in Braille (inclusion need)	30%
	Audio-guides specific for blind/visually impaired are not available (inclusion need)	26.7%

⁶¹⁸ Question 22

⁶¹⁹ Question 22

MS	Need	%
	Other responses with less than 2 responses	23.3%
FI	The transport sector is not covered (mobility need)	48.9%
	None	34%
	Other responses with less than 2 responses	29.8%
	Audio-guides specific for blind/visually impaired are not available (inclusion need)	8.5%
	The leaflets are not available in Braille (inclusion need)	6.4%
MT	The transport sector is not covered (mobility need)	40.4%
	None	22.8%
	Other responses with less than 2 responses	21.3%
	Audio-guides specific for blind/visually impaired are not available (inclusion need)	19.9%
	The leaflets are not available in Braille (inclusion need)	11.8%
RO	The leaflets are not available in Braille (inclusion need)	71%
	Audio-guides specific for blind/visually impaired are not available (inclusion need)	48.6%
	The transport sector is not covered (mobility need)	44.9%
	Other responses with less than 2 responses	4.7%
	None	3.7%

Another question concerned the main problems associated with the Card. Among the respondents, 63% reported that 'The EU Disability Card was not advertised enough', and 60.9% indicated that they noticed 'low awareness among service providers when presenting the Card'. Other problems reported were, in order of magnitude, the low number of organisations involved in the sectors in scope (56%), the fact that discounts are too limited (48.2%), and the low number of Member States involved in the pilot (44.5%). All the problems reported across Member States are listed in Table 91 and Figure 69.

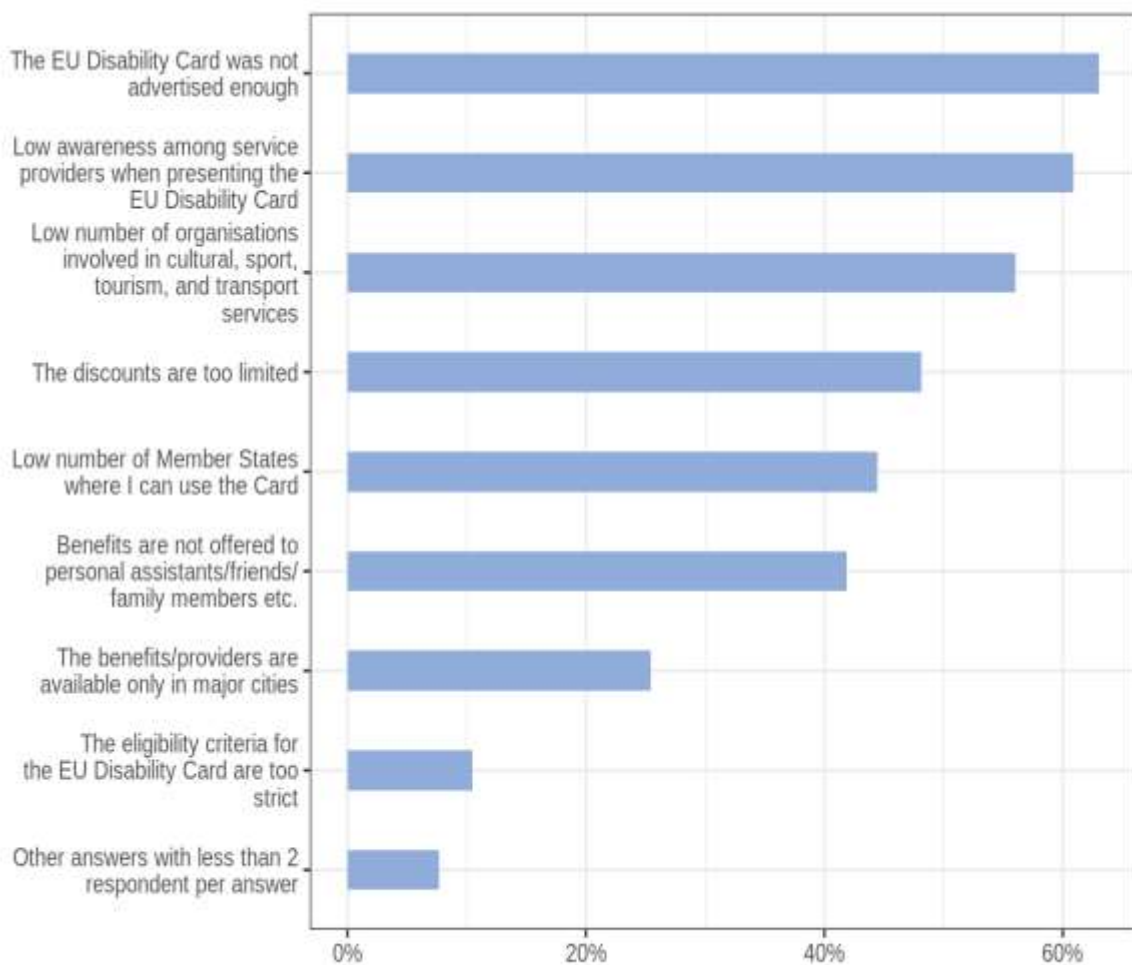
Table 91 - Main problems associated with the Card, across Member States⁶²⁰

Problems	%
The EU Disability Card was not advertised enough	63%
Low awareness among service providers when presenting the EU Disability Card	60.9%

⁶²⁰ Question 23

Problems	%
Low number of organisations involved in cultural, sport, tourism, and transport services	56%
The discounts are too limited	48.2%
Low number of Member States where I can use the Card	44.5%
Benefits are not offered to personal assistants/friends/family members etc.	41.9%
The benefits/providers are available only in major cities	25.4%
The eligibility criteria for the EU Disability Card are too strict	10.5%
Other answers with less than 2 responses per answer	7.7%

Figure 69 - Main problems associated with the Card, across Member States⁶²¹



⁶²¹ Question 23

In BE the main problem is the lack of advertisement of the Card, in CY the low number of service providers participating, whereas in FI, MT, and RO it is the low awareness of service providers when presenting the Card (Figure 70, Table 92).

Figure 70 - Main problems associated with the Card, by Member State⁶²²

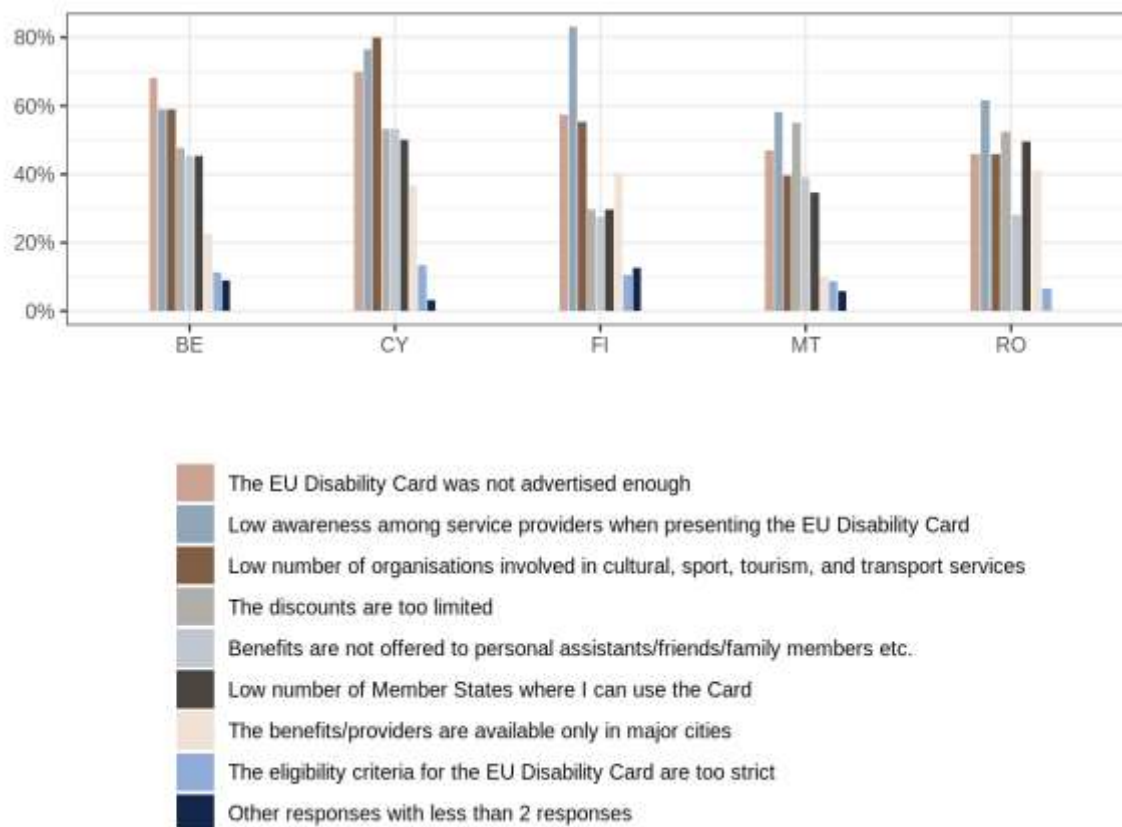


Table 92 - Main problems associated with the Card, by Member State⁶²³

Member State	Problem	%
BE	The EU Disability Card was not advertised enough	68.2%
	Low awareness among service providers when presenting the EU Disability Card	59.1%
	Low number of organisations involved in cultural, sport, tourism, and transport services	59.1%
	The discounts are too limited	47.7%
	Benefits are not offered to personal assistants/friends/family members etc.	45.5%
	Low number of Member States where I can use the Card	45.5%
	The benefits/providers are available only in major cities	22.7%

⁶²² Question 23

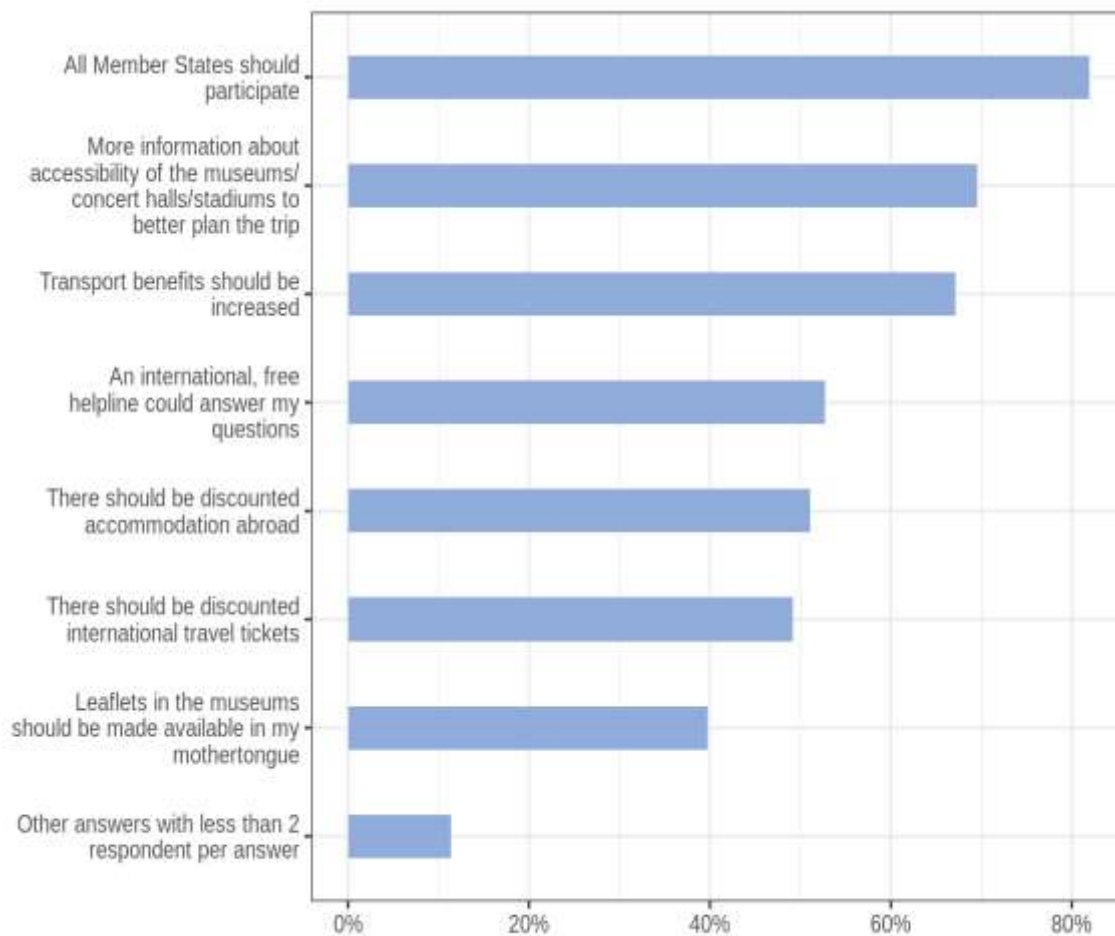
⁶²³ Question 23

Member State	Problem	%
	The eligibility criteria for the EU Disability Card are too strict	11.4%
	Other responses with less than 2 responses	9.1%
CY	Low number of organisations involved in cultural, sport, tourism, and transport services	80%
	Low awareness among service providers when presenting the EU Disability Card	76.7%
	The EU Disability Card was not advertised enough	70%
	Benefits are not offered to personal assistants/friends/family members etc.	53.3%
	The discounts are too limited	53.3%
	Low number of Member States where I can use the Card	50%
	The benefits/providers are available only in major cities	36.7%
	The eligibility criteria for the EU Disability Card are too strict	13.3%
	Other responses with less than 2 responses	3.3%
FI	Low awareness among service providers when presenting the EU Disability Card	83%
	The EU Disability Card was not advertised enough	57.4%
	Low number of organisations involved in cultural, sport, tourism, and transport services	55.3%
	The benefits/providers are available only in major cities	40.4%
	Low number of Member States where I can use the Card	29.8%
	The discounts are too limited	29.8%
	Benefits are not offered to personal assistants/friends/family members etc.	27.7%
	Other responses with less than 2 responses	12.8%
The eligibility criteria for the EU Disability Card are too strict	10.6%	
MT	Low awareness among service providers when presenting the EU Disability Card	58.1%
	The discounts are too limited	55.1%

Member State	Problem	%
	The EU Disability Card was not advertised enough	47.1%
	Low number of organisations involved in cultural, sport, tourism, and transport services	39.7%
	Benefits are not offered to personal assistants/friends/family members etc.	39%
	Low number of Member States where I can use the Card	34.6%
	The benefits/providers are available only in major cities	10.3%
	The eligibility criteria for the EU Disability Card are too strict	8.8%
	Other responses with less than 2 responses	5.9%
RO	Low awareness among service providers when presenting the EU Disability Card	61.7%
	The discounts are too limited	52.3%
	Low number of Member States where I can use the Card	49.5%
	Low number of organisations involved in cultural, sport, tourism, and transport services	45.8%
	The EU Disability Card was not advertised enough	45.8%
	The benefits/providers are available only in major cities	41.1%
	Benefits are not offered to personal assistants/friends/family members etc.	28%
	The eligibility criteria for the EU Disability Card are too strict	6.5%

Among possible solutions to increase cross border mobility, respondents indicated expanding the participation in the Card's scheme across all EU-27 (81.9%), the need of more information about accessibility to improve planning (69.6%), and the need to increase transport benefits (67.1%). Furthermore, a free international helpline was encouraged by 52.7%, whereas 49.2% would welcome discounted international travel tickets, and 39.7% would like leaflets in their own mother tongue (Figure 71).

Figure 71 - Areas for improvement to increase across border mobility, across Member States⁶²⁴



When looking at the responses to the question by individual Member State (Figure 72, Table 93), the main suggestion from respondents in BE, MT, and RO is the participation of all Member States of EU-27. For CY respondents the availability of discounted international travel tickets is of equal importance to participation of the entire EU-27. In FI the Cardholders are more focused on the availability of accessibility information, which is necessary to plan a trip in advance.

⁶²⁴ Question 24

Figure 72 - Areas of improvement to increase across border mobility, by Member State⁶²⁵

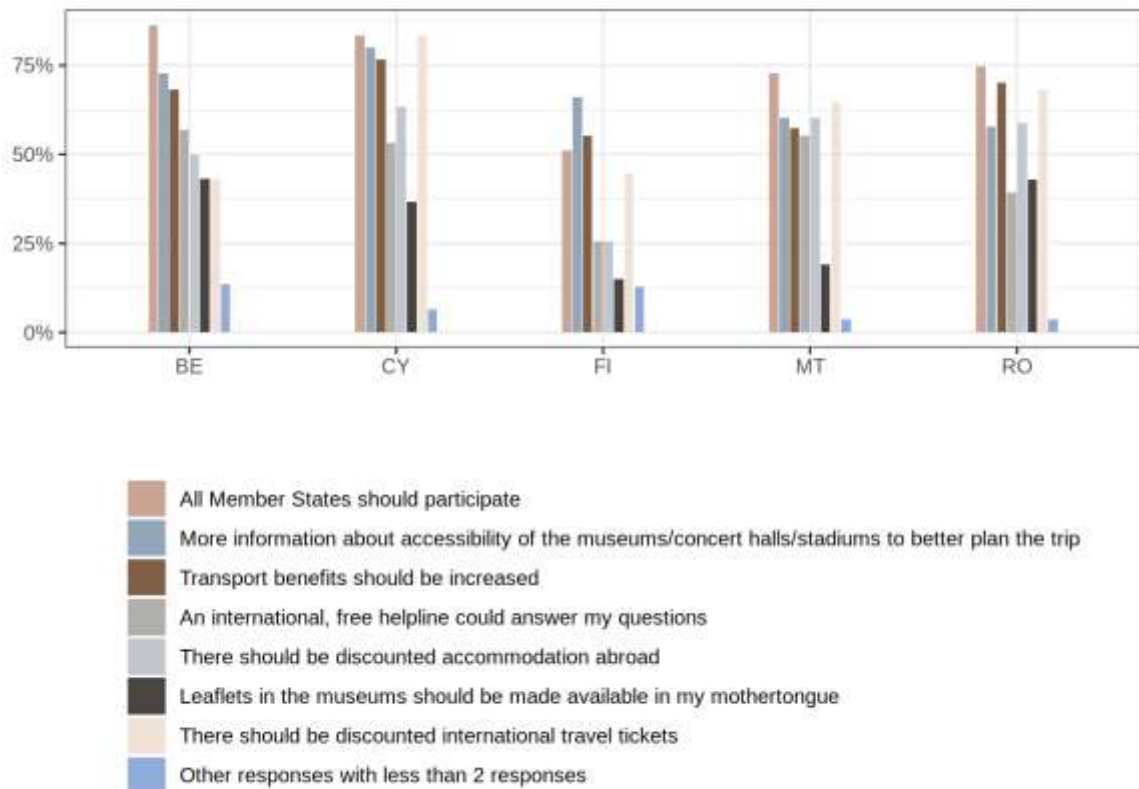


Table 93 - Areas to improve to increase across border mobility, by Member State⁶²⁶

MS	Area to be improved	%
BE	All Member States should participate	86.4%
	More information about accessibility of the museums/concert halls/stadiums to better plan the trip	72.7%
	Transport benefits should be increased	68.2%
	An international, free helpline could answer my questions	56.8%
	There should be discounted accommodation abroad	50%
	Leaflets in the museums should be made available in my mother tongue	43.2%
	There should be discounted international travel tickets	43.2%
	Other responses with less than 2 responses	13.6%

⁶²⁵ Question 24

⁶²⁶ Question 24

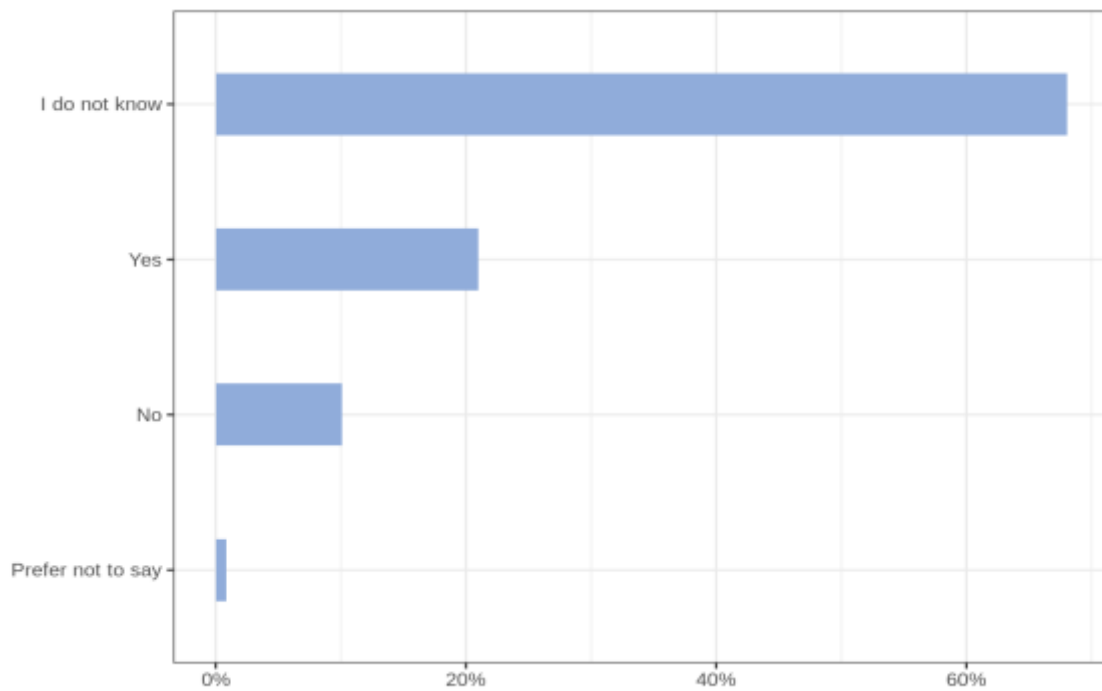
MS	Area to be improved	%
CY	All Member States should participate	83.3%
	There should be discounted international travel tickets	83.3%
	More information about accessibility of the museums/concert halls/stadiums to better plan the trip	80%
	Transport benefits should be increased	76.7%
	There should be discounted accommodation abroad	63.3%
	An international, free helpline could answer my questions	53.3%
	Leaflets in the museums should be made available in my mother tongue	36.7%
	Other responses with less than 2 responses	6.7%
	FI	More information about accessibility of the museums/concert halls/stadiums to better plan the trip
Transport benefits should be increased		55.3%
All Member States should participate		51.1%
There should be discounted international travel tickets		44.7%
An international, free helpline could answer my questions		25.5%
There should be discounted accommodation abroad		25.5%
Leaflets in the museums should be made available in my mother tongue		14.9%
Other responses with less than 2 responses		12.8%
MT	All Member States should participate	72.8%
	There should be discounted international travel tickets	64.7%
	More information about accessibility of the museums/concert halls/stadiums to better plan the trip	60.3%
	There should be discounted accommodation abroad	60.3%
	Transport benefits should be increased	57.4%

MS	Area to be improved	%
	An international, free helpline could answer my questions	55.1%
	Leaflets in the museums should be made available in my mother tongue	19.1%
	Other responses with less than 2 responses	3.7%
RO	All Member States should participate	74.8%
	Transport benefits should be increased	70.1%
	There should be discounted international travel tickets	68.2%
	There should be discounted accommodation abroad	58.9%
	More information about accessibility of the museums/concert halls/stadiums to better plan the trip	57.9%
	Leaflets in the museums should be made available in my mother tongue	43%
	An international, free helpline could answer my questions	39.3%
	Other responses with less than 2 responses	3.7%

Helpline

Most Cardholders (68%) are not aware of the existence of a helpline associated with the Card, 21% of respondents know there is one, and 10.1% report there is none.

Figure 73 - Awareness of the existence of a helpline, across Member States⁶²⁷



Despite the fact that a helpline was established in all Member States except EE⁶²⁸ and RO, at least 50% of Cardholders are not aware that a helpline for the Card exists, with some respondents even reporting the absence of one (Figure 74, Table 94).

⁶²⁷ Question 16.

⁶²⁸ Question 36, first round survey.

Figure 74 - Awareness of the existence of a helpline, by Member State⁶²⁹

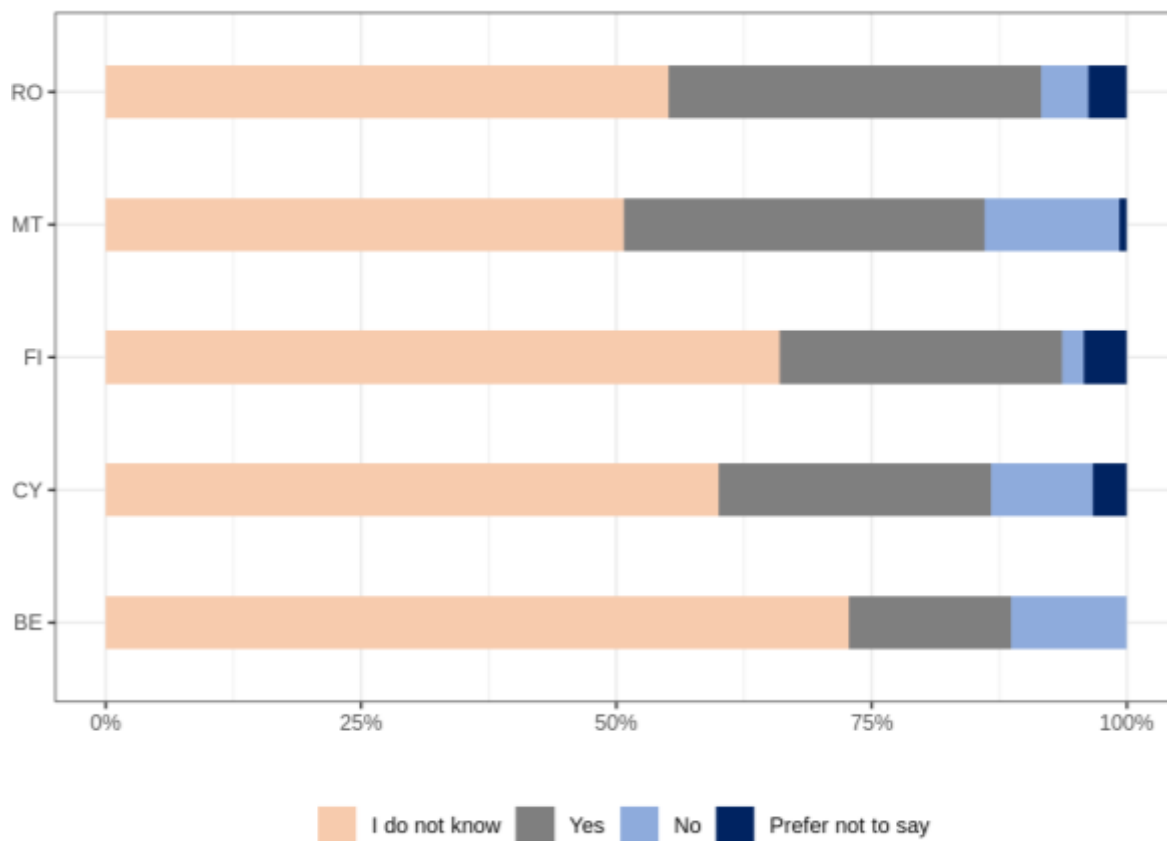


Table 94 - Awareness of the existence of a helpline, by Member State⁶³⁰

MS	Answer	%
BE	I do not know	72.7%
	Yes	15.9%
	No	11.4%
CY	I do not know	60%
	Yes	26.7%
	No	10%
	Prefer not to say	3.3%
FI	I do not know	66%
	Yes	27.7%
	Prefer not to say	4.3%
	No	2.1%
MT	I do not know	50.7%
	Yes	35.3%
	No	13.2%
	Prefer not to say	0.7%

⁶²⁹ Question 16.

⁶³⁰ Question 16.

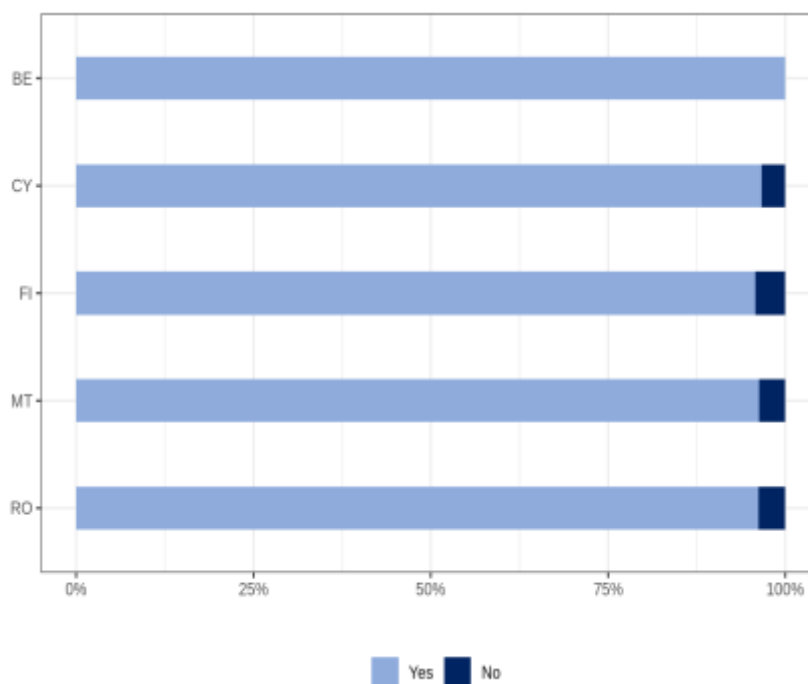
MS	Answer	%
RO	I do not know	55.1%
	Yes	36.4%
	No	4.7%
	Prefer not to say	3.7%

The respondents who made use of the helpline, meant both for providing information and collecting complaints, reported varying levels of satisfaction with the mechanisms for registering a complaint: 43.1% reported being fairly satisfied, 22.4% as slightly satisfied, whereas 20.7% indicated they were very much satisfied and only 13.8% stated they were not satisfied at all⁶³¹

Accessibility and reasonable accommodation

Nearly all (96.74%) respondents across the Member States consider that in order to be more effective, the Card should be accompanied by measures aimed at increasing the accessibility of services (Figure 75). Respondents also report for each sector, whether they consider accessibility to be more of an issue in the public or private sector.

Figure 75 - Accessibility requirements to accompany the Card, by Member State⁶³²

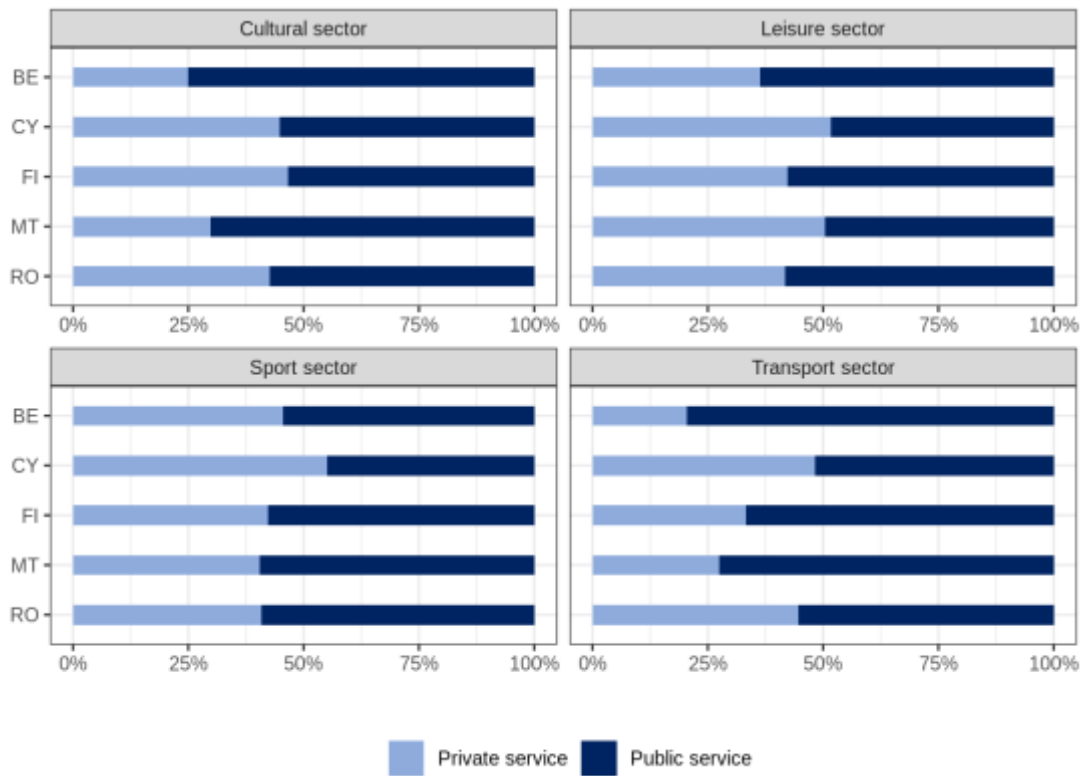


The respondents across all Member States agree that in the cultural sector it should be mainly the public sector to increase accessibility, and this also applies in the transport sector (Figure 76). With regards to the leisure sector, respondents in BE, FI, and RO prefer the public sector to increase accessibility, whereas in CY and MT more or less similar shares feel this role should be that of the private or the public sector. For the sport sector, all but the respondents in CY point to a stronger role of the public sector in ensuring accessibility.

⁶³¹ This question is not analysed in a disaggregated manner due to the low numbers of total respondents per Member State.

⁶³² Question 25.

Figure 76 - Sectors with highest needs of increased accessibility of services, by Member State⁶³³



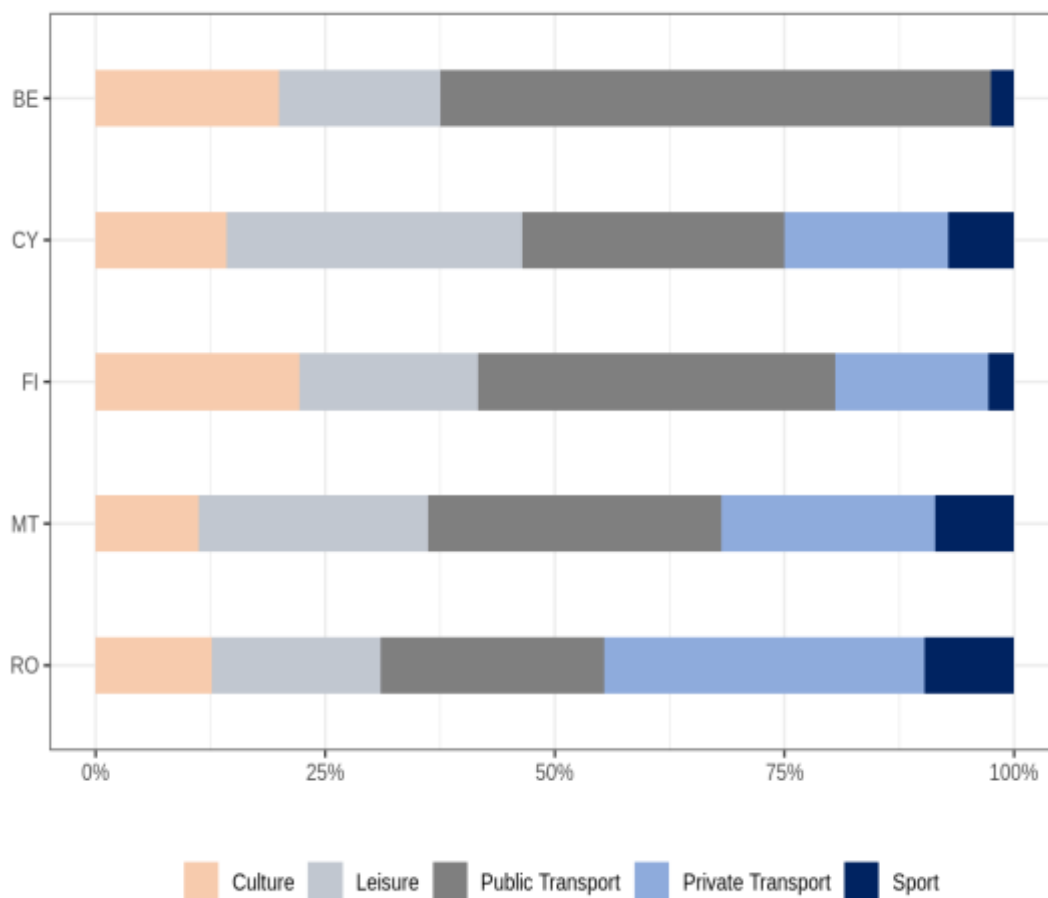
Reasonable accommodation

With respect to the need for the provision of reasonable accommodation, 88.86% of respondents consider that it should be made compulsory as part of the Card⁶³⁴. The sectors where it should be considered the most are illustrated in the figure below for each Member State. Public and private transports are the sectors where provision of reasonable accommodation is more urgent (Figure 77).

⁶³³ Question 26.

⁶³⁴ Question 27.

Figure 77 - Sectors with highest needs of reasonable accommodation provision⁶³⁵



Regression models

In order to understand which categories of respondents are more or less satisfied with the Card, the following variables were selected as outcomes in linear regression models: satisfaction with the benefits provided⁶³⁶, the likelihood of recommending the Card to other users⁶³⁷, the use of the Card in the previous 12 months⁶³⁸, the opinion on the increase in participation in culture, sport and tourism abroad of themselves⁶³⁹, of their fellow citizens with disabilities⁶⁴⁰, and of foreigners with disabilities⁶⁴¹.

Except for the likelihood of recommending the Card to other persons, all dependent variables were recoded as 0-1. All models include fixed effects for each country and use as weights the number of Cardholders in each Member State. Given the small sample size, the results which are marginally insignificant (p value between 0.1 and 0.2) are marked with “+”.

Satisfaction with the benefits provided by socio-economic characteristics

The dependent variable is equal to one if the respondent believes that the benefits (in each sector) responds fairly or very much to the needs of persons with disabilities.

⁶³⁵ Question 28.
⁶³⁶ Questions 14-15
⁶³⁷ Question 13.
⁶³⁸ Question 18.
⁶³⁹ Question 19.
⁶⁴⁰ Question 20.
⁶⁴¹ Question 21.

Table 95 - Regression on the satisfaction with the benefits⁶⁴²

Variables	Across all sectors	Cultural sector	Leisure sector	Sport sector	Private transport	Public transport
Gender (ref. Female)						
Male	0.14**	-0.1*	0.04	-0.05	-0.09*	-0.08+
Age (ref. 18-34)						
35-49	0.05	0	0	-0.17**	-0.07	-0.06
50-64	0.05	0.14*	0.12+	-0.14*	-0.03	0.03
65 or older	-0.03	0.44***	0.29**	-0.16+	0.37***	0.33***
Education (ref. High school or less)						
University degree or equivalent	-0.05	0.11**	0.09*	0.05	-0.12**	-0.08+
Employment status (ref. Employed)						
Not working and looking for a job (i.e. unemployed)	-0.11	-0.29*	-0.09	0.03	-0.21+	-0.08
Not working nor looking for a job (i.e. not in the labour force)	0.05	0.02	0.09	0.02	0.01	0.07
Retired/pensioner	0.05	-0.09	0.07	0.24***	-0.07	0.04
Self-employed	0.08	0.16	0.1	0.03	-0.18	-0.14
Student or in training	-0.17	0.19	-0.16	-0.14	-0.23*	-0.17

Likelihood of recommending the card (0-10)

This likelihood was modelled in an ordinary least square regression. Each coefficient should be interpreted as average points obtained on the 0-10 scale for that category, with every other variable kept constant.

Males, older than 65 years old are more likely to recommend the Card, whereas the more educated and the younger respondents tend to be less likely to recommend the Card.

Table 96 - Regression on the likelihood to recommend the Card⁶⁴³

Variables	Recommend EDC (0-10)
Gender (ref. Female)	
Male	0.46*
Age (ref. 18-34)	
35-49	-0.15
50-64	0.59+
65 or older	1.03*
Education (ref. High school or less)	
University degree or equivalent	-0.15
Employment status (ref. Employed)	
Not working and looking for a job (i.e. unemployed)	-0.48
Not working nor looking for a job (i.e. not in the labour force)	0.43
Retired/pensioner	0.2
Self-employed	-1.14
Student or in training	-2.57***

Use of the Card in the past 12 months by sectors

The use of the Card in the past 12 months was modelled by once again using sociodemographic features as possible influencing factors. Younger respondents are more likely to use the Card for sport or private transport and culture. The Cardholders who are at least 65 years old are more likely to use the Card for public transport. The tertiary education

⁶⁴² Questions 14-15.

⁶⁴³ Question 13.

graduates are less likely to use it in the sport sector with respect to those with a high school diploma or a lower education level, whereas the unemployed are more likely to use the Card for sports than the employed. Students are less likely to use it in any sector in scope. Those out of the labour force are less likely to use it for public transport.

Table 97 - Regression on the Card use, by sector⁶⁴⁴

Variables	Cultural sector	Leisure sector	Sport sector	Public transport	Private transport
Gender (ref. Female)					
Male	0.09+	0.09+	0.06+	0.03	0.03
Age (ref. 18-34)					
35-49	-0.03	0.06	-0.11*	0.09+	-0.14**
50-64	-0.17**	-0.11+	-0.17***	-0.09+	-0.15**
65 or older	0.08	0.04	-0.14*	0.24**	-0.04
Education (ref. High school or less)					
University degree or equivalent	0.05	-0.07	-0.11**	-0.07+	-0.03
Employment status (ref. Employed)					
Not working and looking for a job (i.e. unemployed)	0.17	0.26+	0.47***	0.05	0.2+
Not working nor looking for a job (i.e. not in the labour force)	0.02	-0.11	-0.04	-0.23***	0.09+
Retired/pensioner	-0.13*	-0.06	0.03	-0.05	0.07
Self-employed	0.03	0.09	0.17	-0.13	0.22
Student or in training	-0.43***	-0.41**	-0.23**	-0.23*	-0.22*

Opinion on increase of personal cultural and sport participation, and tourism abroad

Those in the age category 50-64 are less likely to have increased their sport participation.

The university graduates are less likely to consider their participation in any aspect increased. Students are less likely to have experienced an increase in tourism abroad.

Table 98 - Regression on opinion on personal participation increase, by area⁶⁴⁵

Variables	Tourism abroad	Cultural participation	Sport participation
Gender (ref. Female)			
Male	0.04	0.09+	-0.01
Age (ref. 18-34)			
35-49	-0.01	0.15*	-0.08
50-64	-0.06	-0.08	-0.22***
65 or older	0.06	0.09	0.02
Education (ref. High school or less)			
University degree or equivalent	-0.18***	-0.12**	-0.2***
Employment status (ref. Employed)			
Not working and looking for a job (i.e. unemployed)	-0.23+	-0.24+	-0.1
Not working nor looking for a job (i.e. not in the labour force)	-0.45***	-0.11	-0.17**
Retired/pensioner	-0.2**	-0.09	-0.11+

⁶⁴⁴ Question 18.

⁶⁴⁵ Question 19.

Self-employed	-0.1	-0.27	-0.17
Student or in training	-0.52***	-0.13	-0.09

Opinion on increase of fellow citizens' cultural and sport participation, and tourism abroad

Males are less likely than females to consider that their fellow citizens increased their participation and tourism abroad.

The university graduates are less likely to consider their fellow citizens' participation as having increased in any aspect. Even stronger negative effects on the opinion come from being unemployed or out of the labour force.

Table 99 - Regression on opinion on participation increase in their Country, by area⁶⁴⁶

Variables	Tourism abroad	Cultural participation	Sport participation
Gender (ref. Female)			
Male	-0.11**	-0.11**	-0.1**
Age (ref. 18-34)			
35-49	-0.03	-0.14**	-0.23***
50-64	0.01	-0.07	-0.1+
65 or older	0.11	0.03	0.01
Education (ref. High school or less)			
University degree or equivalent	-0.09*	-0.15***	-0.09*
Employment status (ref. Employed)			
Not working and looking for a job (i.e. unemployed)	-0.46***	-0.38***	-0.31**
Not working nor looking for a job (i.e. not in the labour force)	-0.22***	-0.22***	-0.08
Retired/pensioner	-0.05	-0.01	-0.08
Self-employed	-0.06	-0.01	-0.17
Student or in training	0.14	0.05	0.08

Opinion on increase of foreigners' cultural and sport participation, and tourism abroad

Similar findings apply here, where university graduates are the most pessimistic, together with the unemployed and those out of the labour force.

Table 100 - Regression on opinion on participation increase among foreigners, by area⁶⁴⁷

Variables	Tourism abroad	Cultural participation	Sport participation
Gender (ref. Female)			
Male	-0.09*	-0.07+	-0.07+
Age (ref. 18-34)			
35-49	-0.05	-0.09+	-0.29***
50-64	0.01	0.01	-0.06
65 or older	0.14+	0.14+	0.04
Education (ref. High school or less)			

⁶⁴⁶ Question 20.

⁶⁴⁷ Question 21.

Variables	Tourism abroad	Cultural participation	Sport participation
University degree or equivalent	-0.07+	-0.11**	-0.13**
Employment status (ref. Employed)			
Not working and looking for a job (i.e. unemployed)	-0.37***	-0.45***	-0.39***
Not working nor looking for a job (i.e. not in the labour force)	-0.22***	-0.1+	-0.12*
Retired/pensioner	-0.09+	-0.09+	-0.12*
Self-employed	-0.4*	-0.17	-0.1
Student or in training	-0.2+	-0.23*	-0.26**

Survey of service providers

Scope of the analysis

The service providers answering the second round of the survey amounted to 21, coming mainly from Belgium (13), with the absence of respondents from Finland (Table 101). The sectors more represented are those of culture and leisure, which are the ones that more positively reacted to and participated in the Card initiative. These two sectors are also the ones where Cardholders are the least dissatisfied with. Two thirds of the respondents are from the public sector, and usually staff members complete the survey.

Table 101 - Characteristics of the service providers

Variable		Observations
MS	Belgium	13
	Malta	3
	Cyprus	2
	Slovenia	2
	Romania	1
Sector	Culture	13
	Leisure	6
	Sport	1
	Transport	1
Funding	Public provider	14
	Private provider	7
Position of the respondent	Staff	13
	Management	8

Main results

The application process and the related decisions

Most service providers found out about the Card thanks to direct invitations by regional/local or national authority, as well as by associations representing persons with disabilities. Very few cases of participation came from advertisements or information exchange among service providers. The package of benefits was in most cases designed to replicate what was already offered to nationals with disabilities. One third of respondents looked for legal information related to accessibility requirements before joining the initiative.

Table 102 - Discovery of the Card initiative, application process⁶⁴⁸

Variable		Observations
How did the SP find out about the Card?	Direct invitation by a regional/local authority	7
	Direct invitation by a national authority	6
	From an Association that represents persons with disabilities	6
	From other service providers	2
	Advertisements on TV, radio, Internet etc.	1
	From other associations working in the social sector	1
	From other professionals working with persons with disabilities	1
	Prefer not to say	1
How the package of benefits was chosen	You offer the same benefits, already offered to nationals, to foreigners with disabilities as well	19
	Specific offer for EU Cardholders	1
Additional research of legal information required	No	14
	Yes, to verify accessibility requirements	7
	Yes, to understand about public subsidies	1
Effortless and straightforward participation procedure	Fairly	11
	Very much	8
	Not at all	1
	Slightly	1

The benefits offered

Consistently, all service providers answer they grant the same discounts they offered to persons with disabilities before the Card was introduced, and they state that among Cardholders no distinction is made based on their citizenship (Figure 78). Their average ticket prices are shown in Table 103.

The choices regarding whether to provide also the assistants of the person with disabilities with discounts or a free entrance have resembled what was happening before the Card introduction (Figure 79), even in the amount of discount provided (Figure 80).

⁶⁴⁸ Second round online survey, questions 33, 35-37.

Figure 78 - Benefits offered to persons with disabilities, before and after the Card, and based on citizenship⁶⁴⁹

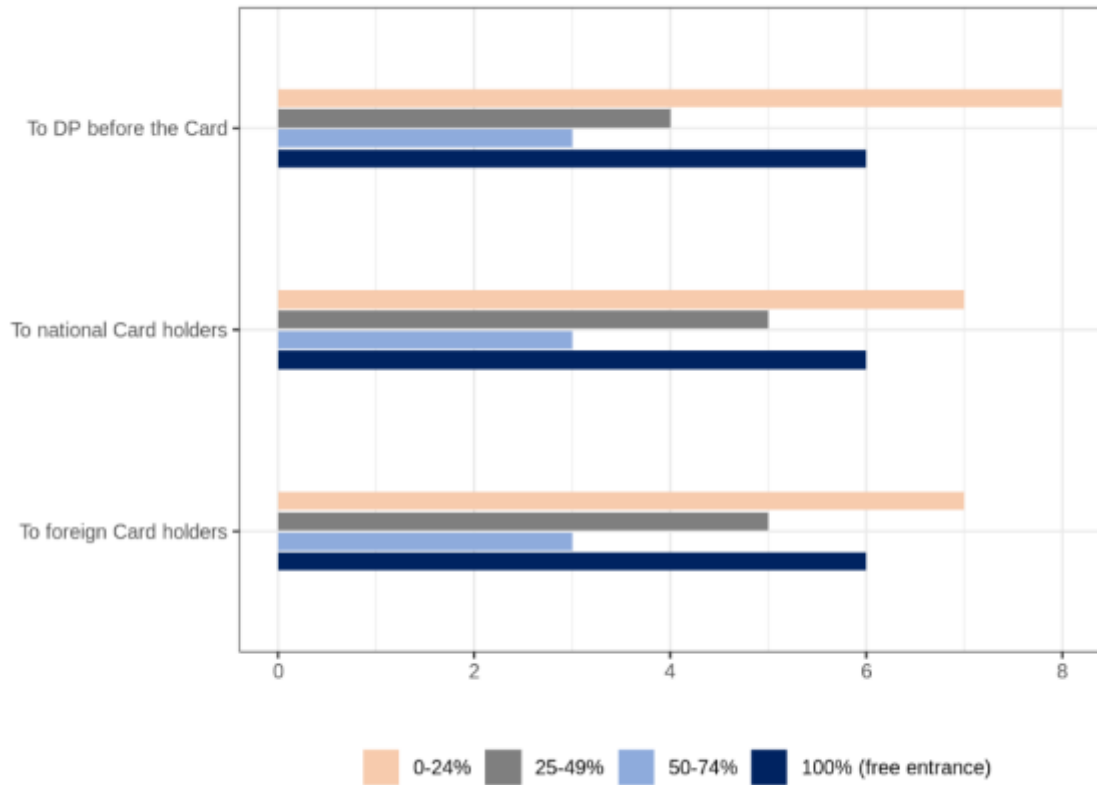


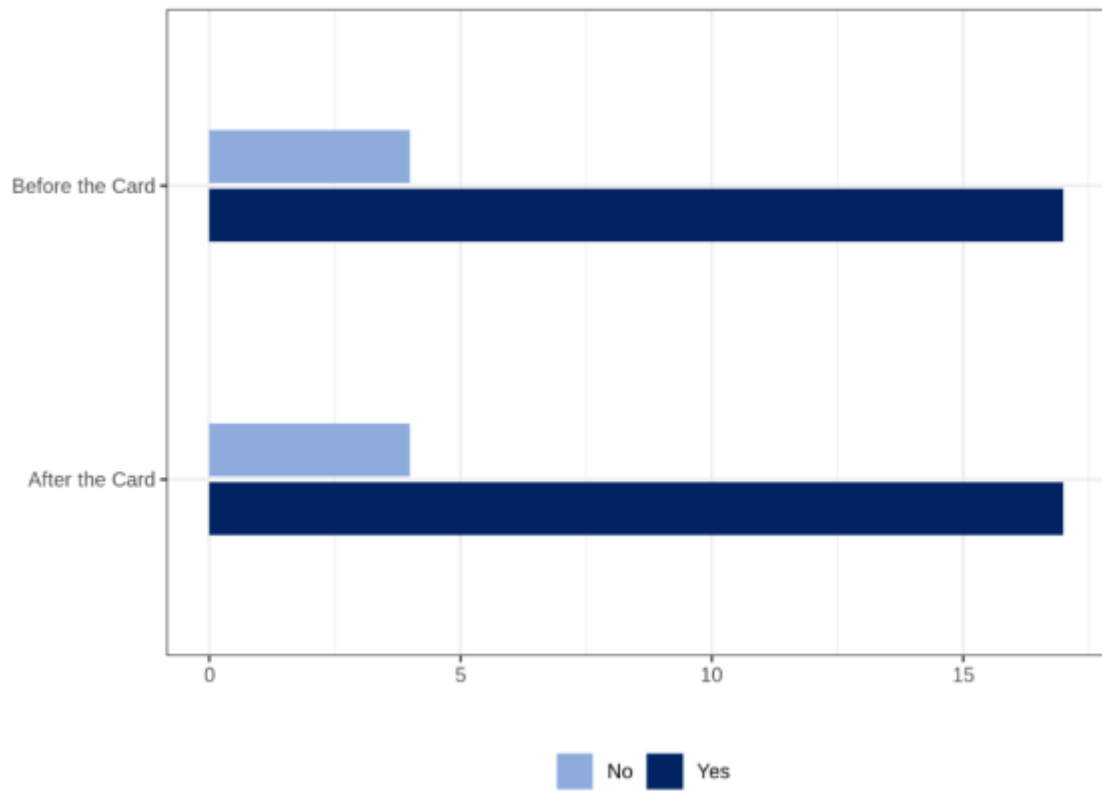
Table 103 - Average ticket price of the service providers responding⁶⁵⁰

Average ticket price	Observations
1-5 Euro	7
11-20 Euro	5
6-10 Euro	4
Free entrance	3
More than 30 Euro	2

⁶⁴⁹ Second round online survey, questions 39, 43-44.

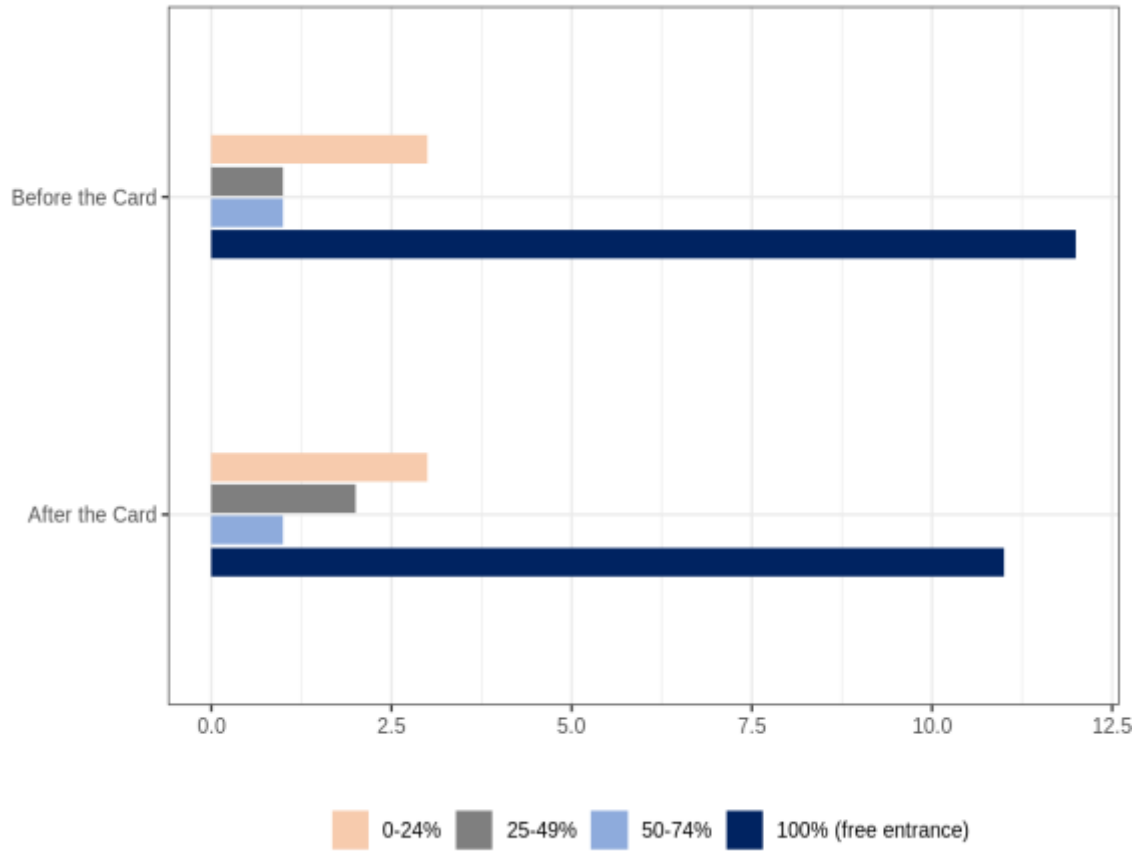
⁶⁵⁰ Second round online survey, question 38.

Figure 79 - Benefits provision to the assistants of persons with disabilities, before and after the Card⁶⁵¹



⁶⁵¹ Second round online survey, questions 40 and 45.

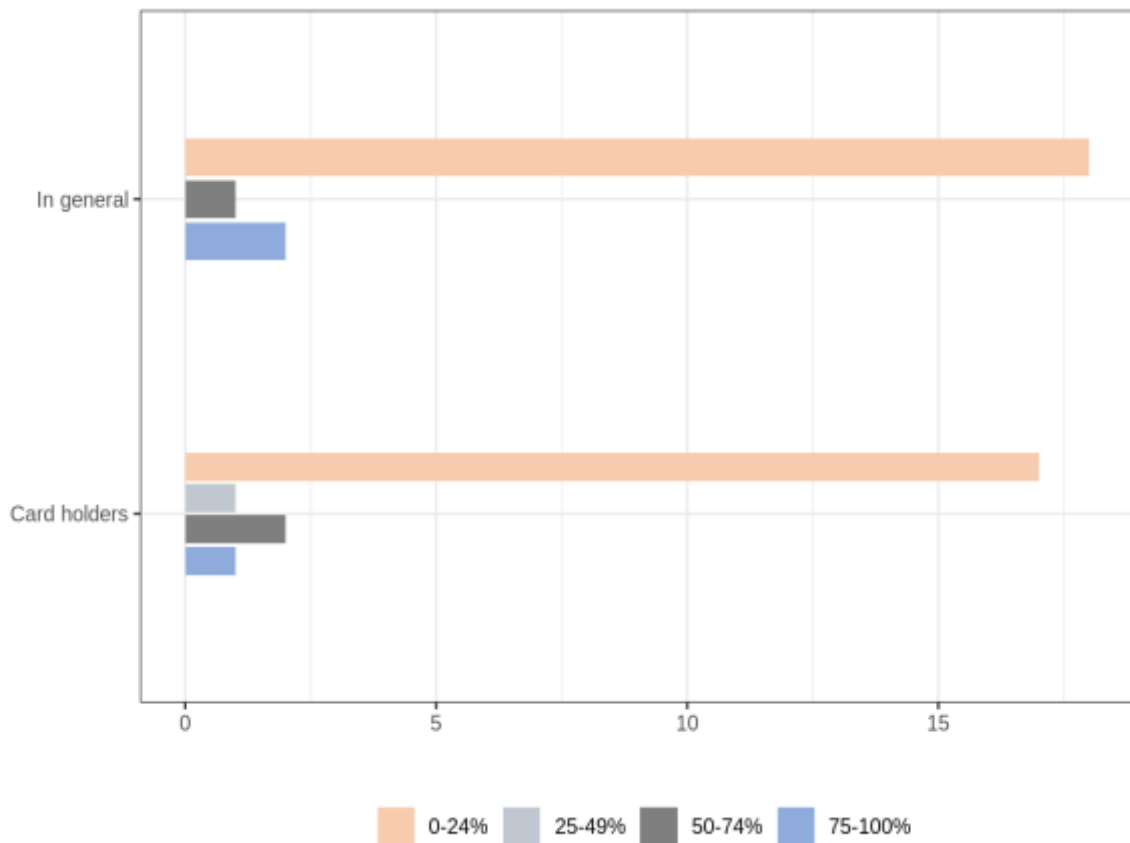
Figure 80 - Benefit types for the assistants of persons with disabilities, before and after the Card⁶⁵²



Most service providers estimate the share of persons with disabilities with an assistant not exceeding the 25% (Figure 81).

⁶⁵² Second round online survey, questions 41 and 46.

Figure 81 - Estimated share of persons with disabilities with an assistant⁶⁵³

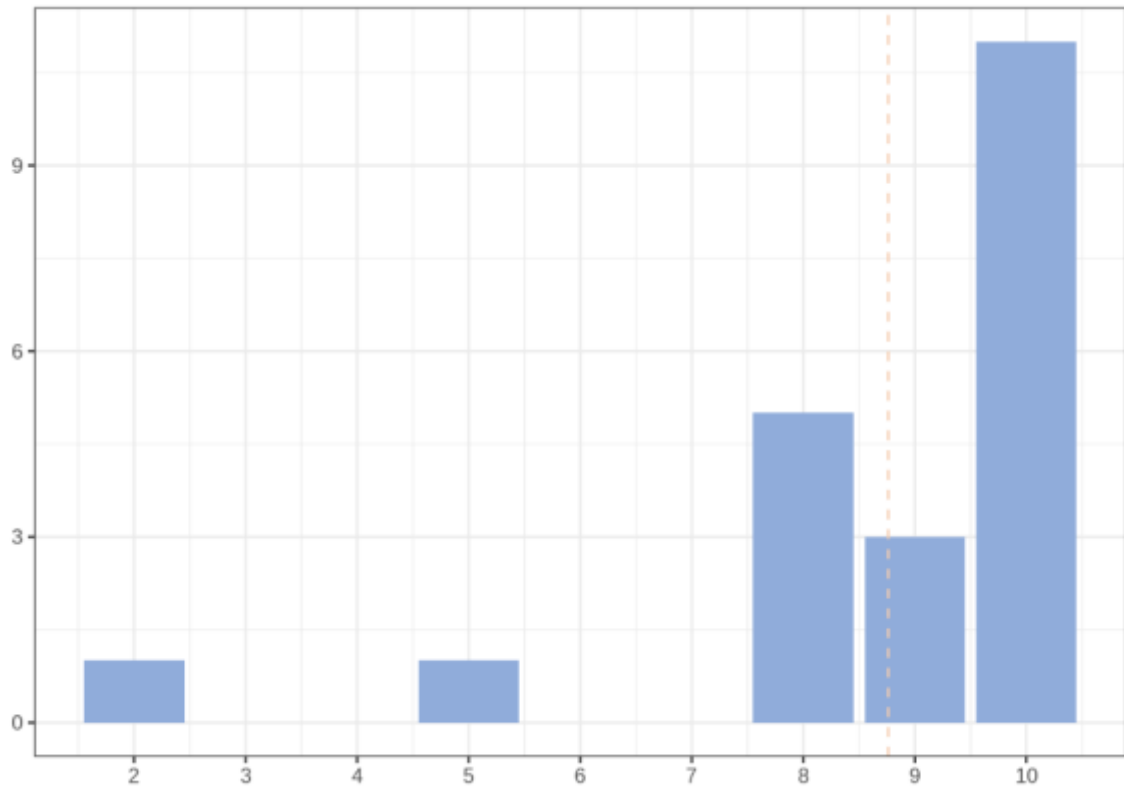


The Card's effects

The satisfaction with the Card initiative is very high among service providers: 19 out of 21 assigned a recommendation score of at least 8, with 11 of them assigning the maximum score, for a median score of 8.8 (Figure 82).

⁶⁵³ Second round online survey, questions 42 and 47.

Figure 82 - Likelihood to recommend the Card to other service providers⁶⁵⁴



Service providers reported the number of tickets they issued for persons with disabilities, Cardholders from their Member State, and Cardholders from other Member States (Figure 83). The trend over time of these three measures are shown in Figure 84. The average numbers of tickets issued to nationals with disabilities have slightly increased, whereas they have remained constant with respect to foreigners with disabilities.

⁶⁵⁴ Second round online survey, question 34.

Figure 83 - Number of tickets issued to persons with disabilities, in 2015-2018⁶⁵⁵

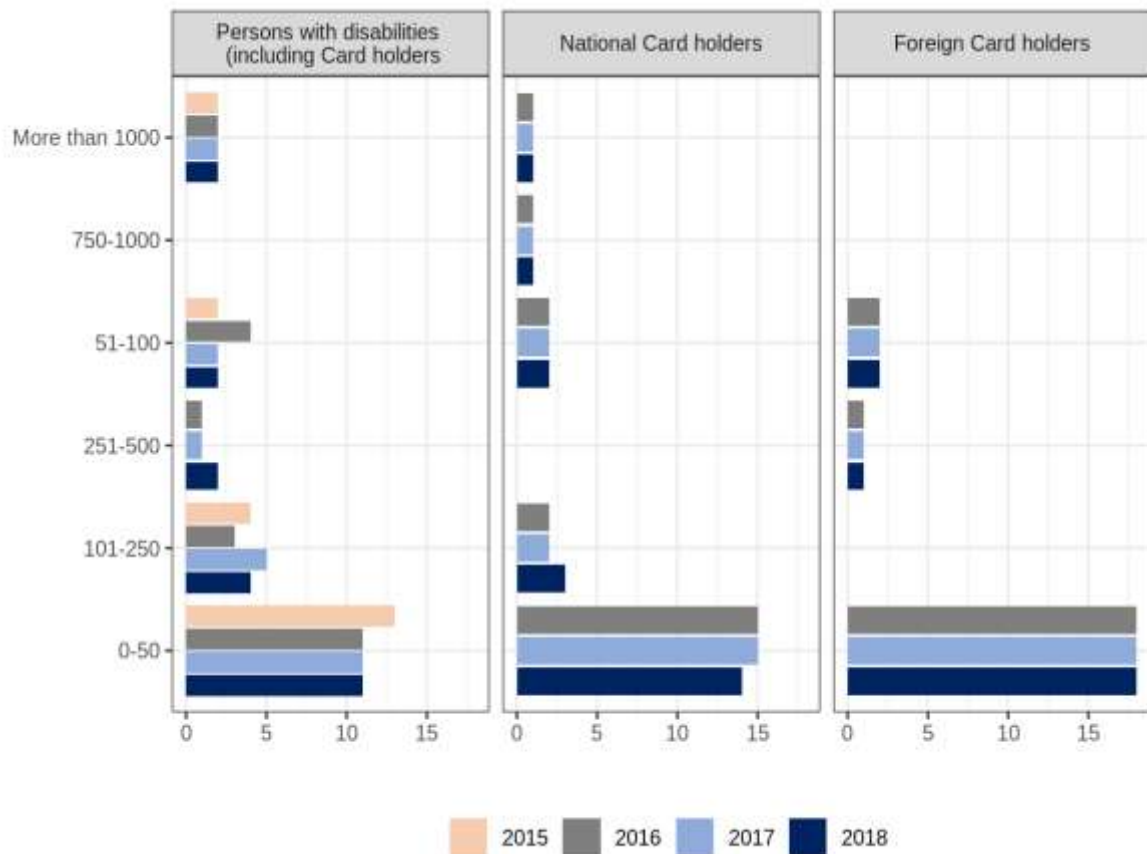
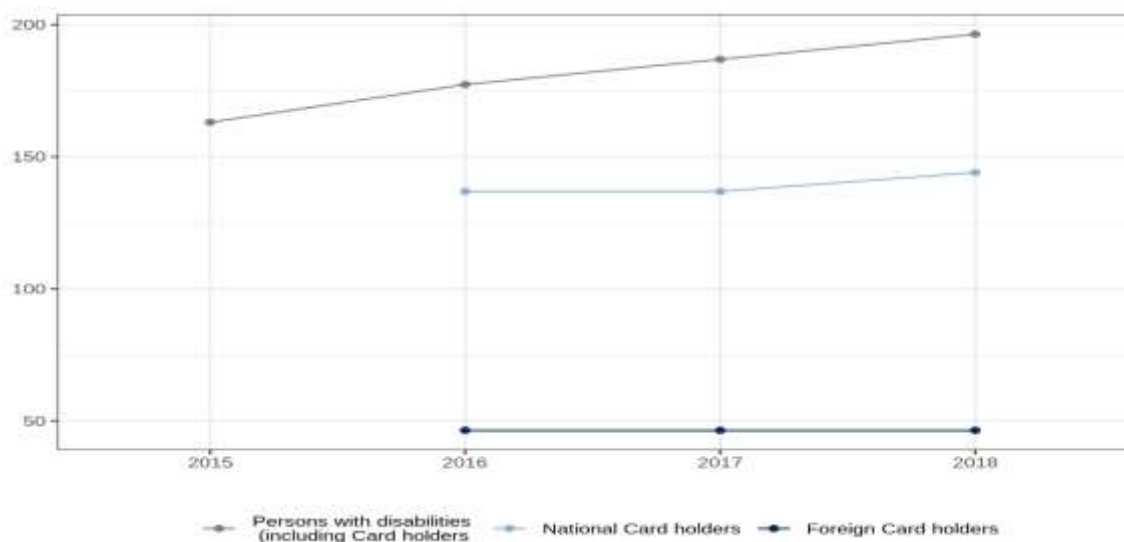


Figure 84 - Trend of the number of tickets issued, by category of persons with disabilities⁶⁵⁶

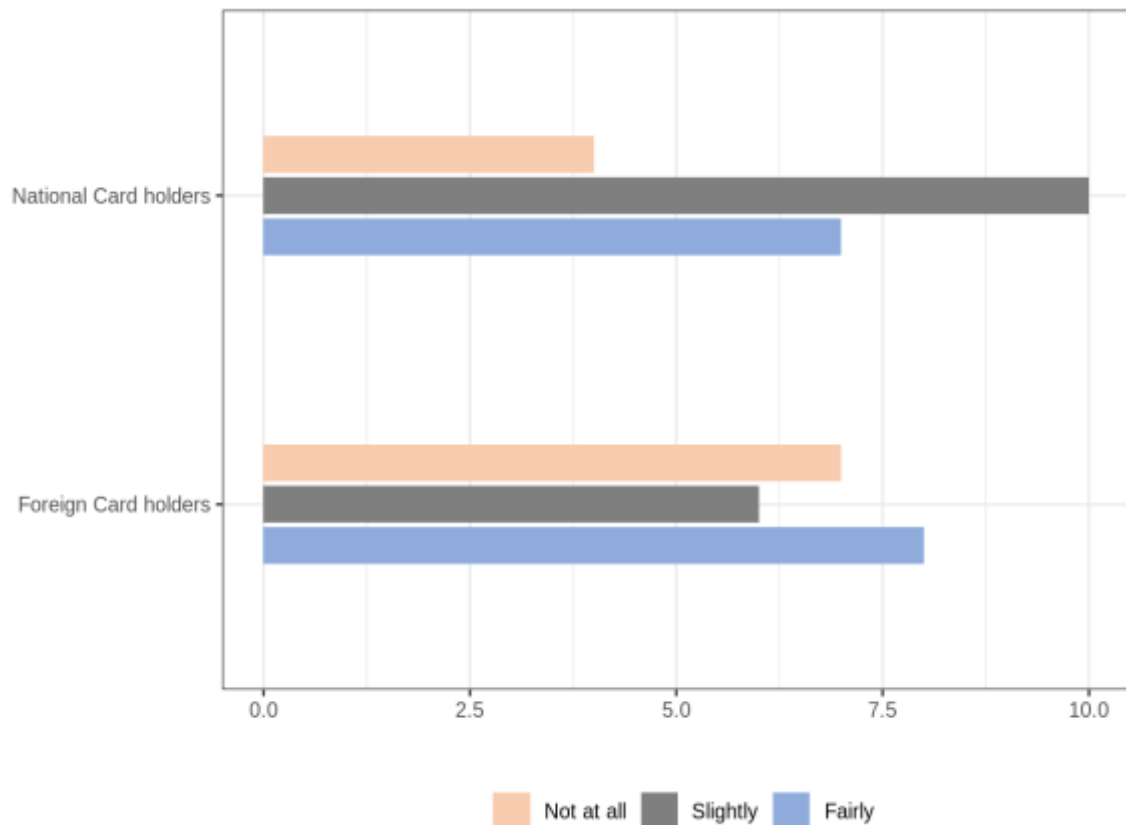


Their opinion on the increase of persons with disabilities accessing their services are consistent with the previous question: 17 out of 21 believe the number of nationals with disabilities among their customers have increased, whereas only 14 believe that foreigners with disabilities are accessing their services more often (Figure 85).

⁶⁵⁵ Second round online survey, questions 48-50.

⁶⁵⁶ Second round online survey, questions 48-50, rielaborated.

Figure 85 - Opinion on the effect of the Card on number of persons with disabilities accessing their services⁶⁵⁷

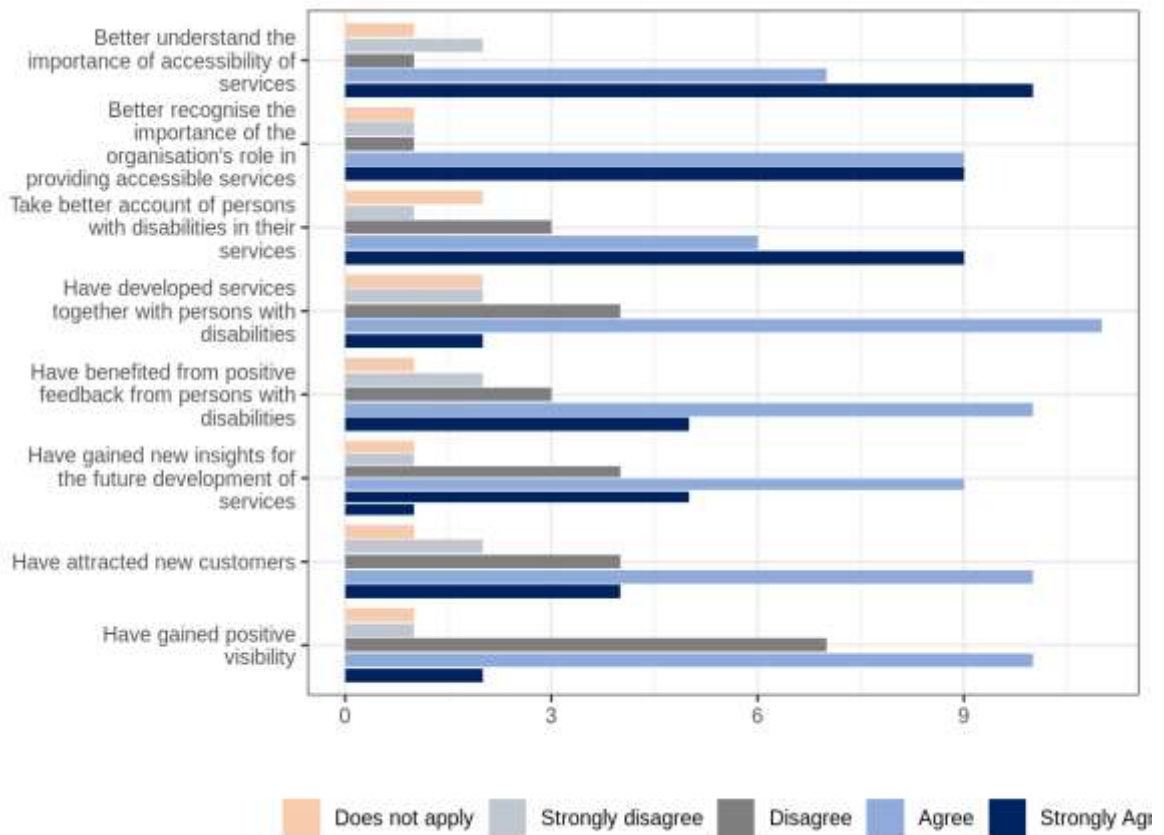


Together with the visitor with disabilities, often other visitors other than the assistant accompany them: according to most service providers (18) on average 1-2 persons per Cardholder pay the full ticket. Two service providers report that on average 5 or more persons per Cardholder pay the full ticket, and a single service provider reported zero additional visitors.

Not only was the introduction of the Card bringing in new customers, though only slightly, but the attitudes towards disability among service providers have improved. The service providers report to better understand the importance of accessibility of services (17), better recognize the importance of their organisation’s role in providing accessible services (18), and take better account of persons with disabilities in their services (Figure 86).

⁶⁵⁷ Second round online survey, questions 51-52.

Figure 86 - Positive effects on the service providers from participating in the pilot action⁶⁵⁸



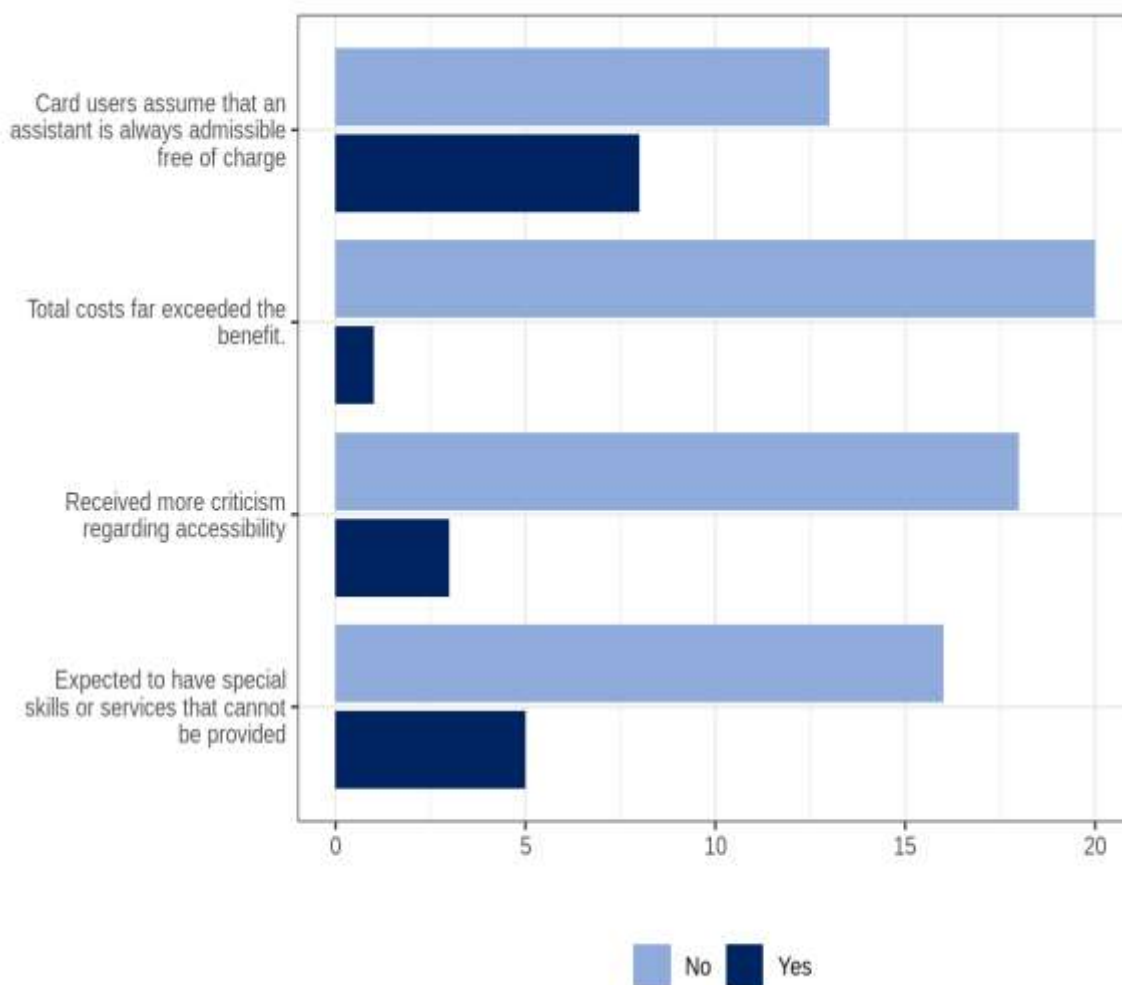
Nevertheless, some concerns regarding their participation have been reported. Only one service provider reported the costs to far exceed the benefits, eight service providers reported that Cardholders assumed their assistant always to be free of charge (Figure 87).

For what concerns monitoring procedures, ten service providers reported not to perform any, whereas nine have an internal registration, three conduct period survey, and one also reports to a public body.

More than half the service providers do not perform customer satisfaction assessments, eight do perform them on sport, whereas three service providers have satisfaction surveys online.

⁶⁵⁸ Second round online survey, question 58.

Figure 87 - Concerns regarding participating⁶⁵⁹



Accessibility

Participation in the Card initiative was accompanied by accessibility improvements for many service providers (Table 104). The changes mainly reported are ramps and elevators. Nevertheless, there has been reports of museums developing special guided tours for the visually impaired⁶⁶⁰, entire buildings built under UN CRPD principles⁶⁶¹

Table 104 - Changes in accessibility after the Card⁶⁶²

Variable		Observations
Whether performed changes in the accessibility of services ⁶⁶³	Yes	22
	No	5
Reasons why accessibility changes were made	To ensure adequate services	7
	You were requested by persons with disabilities	6
	Other	2

⁶⁵⁹ Second round online survey, question 59.

⁶⁶⁰ National museum of fine arts in Malta.

⁶⁶¹ Esplora, Malta's interactive Science Centre. <http://esplora.org.mt>

⁶⁶² Second round online survey, questions 54-57.

⁶⁶³ First and second round of the survey pulled.

Variable		Observations
	For business opportunities	1
	You were obliged by legislation	1
Whether financing was received to make the accessibility changes	No	16
	Yes	5
More accessibility changes would have been made if additional financing was granted	Yes	17
	No	4

16.3.4. Focus groups

Management of service providers across Member States	
Topic	Description
Provision of benefits to persons with disabilities in the sectors in scope outside the Card's scheme	The provision of benefits to nationals with disabilities can be mandatory or left at the discretion of service providers depending on the Member State and specific sector. Notably, it is left at the discretion of service providers in all sectors in scope in BE, FI, MT. In CY and SI, it is at discretion of the service providers in the culture, leisure and sport sectors; instead, transport service providers receive financial support from the government to provide benefits to nationals according to specific criteria. In RO, there are different provisions of law depending on the degree of disability ⁶⁶⁴ . Notably, national legislation recognises four degrees of disabilities and law-mandated benefits only concern accentuated or severe disabilities leaving out moderate or light disabilities ⁶⁶⁵ . Additionally, in CY ⁶⁶⁶ and MT ⁶⁶⁷ , a National Disability Card was in place prior to the EU Disability Card, covering the four sectors in scope, but service providers' participation in these schemes was voluntary. Prior to the introduction of the Card, the provision of benefits to nationals with disabilities was not supported by any public support scheme in BE, CY and FI, whilst in MT and SI ⁶⁶⁸ public support schemes were in place for transport operators. In RO, public service providers offering benefits to persons with disabilities were supported directly by the state budget
Provision of benefits within the Card's scheme	The introduction of the Card extended the provision of benefits also to foreigners with disabilities holding the Card. Moreover, in some countries, while the provision of benefits prior to the introduction of the Card was limited to specific targets among persons with disabilities, the introduction of the Card extended it to a larger group of beneficiaries, by addressing all persons with disabilities regardless of other individual characteristics (BE, CY and RO).
Participation of service providers in the Card's scheme	The participation of service providers is voluntary in BE, CY, FI, MT and SI, where the DCNO established individual contacts with service providers to be involved. In RO, where service providers covered by the Card are all state-owned, the scheme is legally binding.
Managing contacts with service providers	In all Member States except for RO, the DCNO directly managed contacts with service providers participating in the Card's scheme in all sectors in scope. Communication mechanisms were the same across all sectors and were run through

⁶⁶⁴ It is compulsory for national (provided by the state) cultural/sports/touristic/leisure institutions to facilitate the access of persons with disabilities. As such, children with disabilities and their personal assistant receive free access to museums, shows, artistic and sports manifestations. Adults with severe disabilities and their personal assistants benefit from gratuity for the above activities. Adults with light or medium disabilities benefit from the same reduced-price entry as students.

⁶⁶⁵ Source: focus group with the DCNO

⁶⁶⁶ In CY, the National Disability Card is called "Social Card". See at: <http://www.mlsi.gov.cy/mlsi/sid/sidv2.nsf/All/A4C6FBAEF037C466C2257BBA0039174F?OpenDocument>

⁶⁶⁷ In MT, the National Disability Card is called "Special Identity Card – SID". See at: <https://crpd.org.mt/services/sid-eu-card/>.

⁶⁶⁸ In SI public transport operators received subsidies to provide benefits to a limited target pool among persons with disabilities, including war veterans and civilian war invalids.

Management of service providers across Member States	
Topic	Description
	individual contacts in CY, FI, MT and RO ⁶⁶⁹ . In BE and SI, there were no systematic communication mechanisms in place.
Conclusions and areas for improvement	<p>The analysis of the recruitment and management of service providers within the national Card's schemes raised two key mechanisms that might positively contribute towards the success of the Card:</p> <ul style="list-style-type: none"> • Multiplier effect: the Finnish case shows that the identification and involvement of a well-known service provider with a nationwide scope may act as a lever to prompt other service providers into the system. • Accessible information: since the issuing of the Card requires the creation of a national Card's website with clear information on the package of benefits included, the Card could play a role in improving the internet accessibility of those service providers lacking an accessible website or a website at all. <p>Recruitment and managing mechanisms are key to the overall performance of the Card's system. Under the purview of this case study, two main areas of improvement might be identified. Notably:</p> <ul style="list-style-type: none"> • Accessibility: the enjoyment of benefits for persons with disabilities is, in most cases, conditional on physical accessibility. This is particularly true for the transport sector, where several stakeholders from different countries identify an issue of accessibility. Hence, the involvement of a large number of service providers in the Card's scheme may yield no added value if this does not go hand in hand with the enhancement of facilities' physical accessibility. • Systematic communication: in most countries in scope, it was found that no regular communication channels were established to manage contacts with service providers. In fact, a plethora of communication channels were leveraged, including emails, phone calls, surveys, events, etc. In addition, communication most usually happened on an <i>ad hoc</i> basis without any fixed communication timelines. In this context, the lack of a clear and comprehensive strategy to manage contacts with service providers might arguably risk translating into duplication of efforts and ineffective communications.

Nudging service providers - The public transport case	
Topic	Description
State of play on the provision of benefits to persons with disabilities outside the Card's scheme	<p>The provision of benefits to persons with disabilities by national public transport operators outside the Card's scheme</p> <p>In all concerned Member States, public transport operators provide benefits to nationals with disabilities outside the Card's scheme. An exception is public airline operators, which envision disability-related benefits only in FI⁶⁷⁰. In BE, RO and SI all public transport operators except airlines offer benefits both to persons with disabilities and their personal assistants. However, whilst in BE the benefits are offered to all persons with disabilities, in RO and SI benefits target only certain categories of persons with disabilities. Specifically, in RO benefits are only offered to persons with severe and accentuated disabilities. In SI, war invalids and personal assistants travel free of charge. Persons with visual impairments are entitled to 75% discounts when travelling by train and their personal assistant travels for free. Finally, in FI, persons with disabilities do not receive direct financial benefits, but their personal assistants travel for free⁶⁷¹.</p>

⁶⁶⁹ Source: survey with the DCNO.

⁶⁷⁰ In the EU, airlines operators comply with the EU Regulation 1107/2006, establishing rules for the protection of and provision of assistance to persons with disabilities and persons with reduced mobility travelling by air, both to protect them against discrimination and to ensure that they receive assistance (art. 1). See at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006R1107>.

⁶⁷¹ This is based on a human rights-based approach to disability according to which persons with disabilities are considered on an equal basis with other individuals. Hence, they are not exempted from paying fees to enjoy benefits, but in case they need a personal assistant to fully enjoy a service, the personal assistant is exempted from paying the fee. In this

Nudging service providers - The public transport case	
Topic	Description
	<p>Public support schemes for the provision of benefits to persons with disabilities in public transport sector outside the Card's scheme The provision of benefits to nationals with disabilities is based on a public support scheme in FI, RO and SI. The public support scheme is managed at different administrative levels according to the specific Member State administrative and legislative system.</p>
The introduction of the EU Disability Card	<p>Coverage of the public transport sector across Member States Following the introduction of the Card, public transport operators have been involved in the Card's scheme in FI since the beginning of 2020, whereas in SI they will be included by 1 July 2020. In both countries, the Card covers train and coaches.</p>
Key factors incentivising/hampering service providers' participation	<p>Key factors incentivising/hampering service providers' participation In the countries in which the transport sector has been covered, public support schemes were already in place prior to the introduction of the Card. This seems to suggest that the presence of a well-established public support scheme for transport operators may facilitate their involvement in the Card's scheme.</p> <p>The assessment of the key factors hampering and/or incentivising the participation of transport service providers should take into account the nature of their participation: i.e. voluntary or mandatory. In the first case, it is essential that service providers receive complete and accurate information on the Card. Without clear information on the administrative and financial schemes behind its implementation, transport operators would in fact lack the financial incentives to join the scheme and would instead risk being dissuaded by the fear of financial losses. In turn, providing transport operators with clear and comprehensive information on the rationale and objectives surrounding the Card is pivotal for leveraging non-financial incentives such as commitment to social inclusion, branding, etc. In such a context, raising awareness of the Card appears crucial in the case of voluntary service provider participation in the scheme. In this sense, the Finnish experience, in which the DCNO played an active role in persuading the main railway operator to adhere to the system, shows that the political commitment of the recruiting authority is crucial.</p> <p>When participation of transport operators is state-mandated, as evidenced by the Slovenian case, the recruitment process is not necessarily automatic, but negotiations may be needed, involving different stakeholders, such as the transport operators, the ministries competent in the transport sector and the DCNO. Negotiations may precisely concern the administrative and financial scheme of the Card, the identification of the package of benefits and the pool of beneficiaries, etc. In the Slovenian experience, discussions are ongoing concerning the potential extension of the target of disability-related benefits and the related supporting financial measures. This underlines the relevance of this topic at the negotiation stage, suggesting that early identification of the authority that will be in charge of covering the costs of the Card plays an important role towards the success of such negotiations.</p> <p>As regards the disincentives that may discourage service providers from participating in the scheme, it is worth mentioning the issue of accessibility of transport facilities. In the concerned Member States, consulted stakeholders highlight that making transport means accessible is the <i>condition sine qua non</i> to ensure a successful implementation of the Card. The concerns expressed by the transport stakeholders suggest that limited accessibility not only hampers the effective implementation of the Card but can also act as a disincentive for transport operators to participate in the scheme. In fact, the risk is that transport operators perceive no added value of their participation in the Card's scheme.</p>

manner, persons with disabilities are considered on an equal footing with other persons, but no additional burden is imposed on them in case they are not self-sufficient.

Nudging service providers - The public transport case	
Topic	Description
Conclusions and recommendations	<p>Potential transferability Main causal mechanisms identified as supporting participation include:</p> <p><i>Political commitment:</i> regardless of the voluntary or mandatory nature of the participation of public transport operators, the transferability of the model is directly related to the political willingness of the institutional actors involved as well as to their level of commitment towards the social inclusion of persons with disabilities.</p> <p><i>Pre-existence of a public support scheme:</i> both the countries where the public transport sector is covered already subsidised transport services at the national level, thus the public support scheme was used to cover the benefits and services offered under the Card's scheme.</p> <p><i>Provision of timely and comprehensive information about the Card:</i> as illustrated by the Finnish case, when participation in the scheme is left at the discretion of transport operators, the active role played by the DCNO in raising awareness about the Card among public transport operators and broader civil society was pivotal. Indeed, this contributed to minimising possible resistances among transport operators and increasing their positive attitude towards the Card's objectives, thus encouraging them to participate. In turn, this facilitated the DCNO in leveraging both financial and non-financial incentives, coupled with the pressure of a highly sensitised public opinion on social inclusion.</p> <p>Internal and cross-border mobility Participants were not able to share any statistical evidence.</p> <p>Social acceptance A number of factors emerged as enhancing the social acceptance of the Card among transport operators and civil society. Notably:</p> <ul style="list-style-type: none"> • <i>Simplification:</i> the case of the Finnish intercity bus sector, where three different local cards were in place prior to the EU Disability Card, shows that the Card contributed towards administrative simplification; it was consequently welcomed by concerned transport operators. • <i>Proof of disability:</i> the Card is a EU proof of disability certifying the disability status of passengers, thus easing the recognition of disability condition by transport operators; this is particularly important in case of invisible impairments, since Cardholders may be granted services and benefits (e.g. priority boarding) without having to provide any additional proof of their status. <p>Areas for improvement The main areas of improvement that emerged are:</p> <ul style="list-style-type: none"> • <i>E-ticketing:</i> although economic transactions in the transport sectors often occur online, it seems that the Card does not always allow the possibility to obtain discounts when purchasing online tickets. The possibility to use the Card also when buying e-tickets would arguably increase its adoption. • <i>Monitoring:</i> this case study has highlighted a generalised lack of evidence on the number of persons with disabilities who benefit from economic advantages when using the Card within the public transport sector. Since the transport sector is generally subsidised, a good practice may be drawn from the Slovenian and Romanian experiences, where the railway operator is obliged to provide periodic statistical evidence to the Ministry of Transport. This suggests that making the provision of financial support to transport operators conditional on the transmission of periodic statistical data may serve to address the issue of the lack of monitoring data on the Card in this sector. • <i>Passenger intermodality:</i> since transport is increasingly multimodal⁶⁷², in order to reach a broader range of users in the transport sector, the Card should ensure that the benefits available for persons with disabilities are the same throughout the entire journey.

⁶⁷² Multimodality is a type of commuting that involves the use different transport modalities during the journey. See at: https://ec.europa.eu/transport/themes/logistics-and-multimodal-transport/multimodal-and-combined-transport_en

Nudging service providers - The public transport case	
Topic	Description
	<ul style="list-style-type: none"> • <i>Human rights-based approach</i>: the effectiveness of the Card is directly related to a shift in mindset. From a legal standpoint, in order to be treated in an equal manner, persons with disabilities should not be entitled to receive “benefits” but should be granted “rights”. Accordingly, if communication platforms convey the message that persons with disabilities should be granted “benefits”, they put the emphasis on the “disability” aspect, overshadowing the social inclusion discourse. This arguably reinforces a vicious circle that should instead be overcome through the Card.

A co-operation model - The Card's implementation in a multi-level administrative system	
Topic	Description
Design of the Steering Committee	<p>Division of tasks and responsibilities</p> <p>The FPS is in charge of leading the Card project and it is responsible for coordinating the different actors involved in the Steering Committee. The FPS is also the contact point for the Steering Committee at the European level, collaborating and communicating with the Commission and the other Member States. Currently, the FPS coordinates the activities of the four institutions in the field of disability to ensure the effective functioning of the Card. The other four public institutions in the field of disability represent their regions of competencies, and notably:</p> <ul style="list-style-type: none"> • Service Phare for the Brussels-Capital Region • AViQ for the Walloon Region • VAPH for the Flemish Region • DSL for the German-speaking Community <p>The CBSS plays a technical and functional role, responsible for managing the data exchanges between the institutions through regional Crossroad Banks.</p> <p>Rationale to outsource the production and delivery of the EU Disability Card to a private entity</p> <p>As for the involvement of the private entity responsible for the production of the Card, the Steering Committee followed what was already done for the EU Parking Card⁶⁷³. Since the Steering Committee did not have the means for producing the Card, it was decided to outsource the production and delivery of the Card to a private entity. Thus, the DCNO launched a public tender, Multi-Post participated and won; hence it is the entity responsible for the production of the Card for a period of three years that was then extended for other two years. The timing extension did not require any other public tender as it was already foreseen within the first agreement.</p> <p>Type and frequency of cooperation activities between the members</p> <p>The Steering Committee organises monthly meetings throughout duration of the project, especially during the inception phase of the pilot project, prior to the launch of the Card. The strong cooperation already in place between the members of the Steering Committee facilitated the functioning of the Steering Committee itself. The previous experiences between the bodies in the field of disability was key to the success of the Card project. In particular, the FPS played a crucial role in establishing the Steering Committee in a short time span in order to respond to the EU Call for the Card system⁶⁷⁴. The longstanding and structured cooperation between the institutions and relative trust made the arrangements between bodies possible and successful.</p>
Funding	<p>Since the beginning of the Card project, the collaboration between the five institutions was approved by the five ministries in the field of disability which are responsible for determining the financial sustainability of the Card. An agreement was signed by the five institutions related to i) the share of funding contributed by each institution and ii) the funding for the production and delivery of the Card.</p> <p>The Card's sustainability over the long term is ensured thanks to the use of national resources and budgets to fund the Card's scheme.</p>
Impact of the EU Disability Card on the mobility of persons with disabilities	<p>There is no statistical evidence available to quantify the number of service providers participating in the Card. Moreover, it is difficult to establish whether there was an increase in service providers offering benefits to persons with disabilities in Belgium after the introduction of the Card. Despite this general lack of statistics and monitoring data, the feedback provided by the members of the Steering Committee with respect to the impact of the Card is positive. Notably:</p> <p>In the Flemish Region, there is significant participation of service providers in the Card system. After two years after the launch of the Card, there is a capillary involvement of service providers. In particular, out of 300 Flemish communities, service providers from around 50 communities participate in the Card's scheme. Moreover, there is an increasing demand from the service providers to receive promotional material to advertise the Card.</p> <p>In the Walloon Region, there is no direct contact with the service providers involved in the Card. Therefore, it is not known if the service providers participating in the Card system already provided benefits to persons with disabilities, and if there was an increase in service providers offering benefits. However, there is a continued demand by service providers to participate in the Card's scheme. Moreover, AViQ is directly committed to</p>

⁶⁷³ https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/belgium/index_en.htm

⁶⁷⁴ <https://ec.europa.eu/social/main.jsp?catId=629&langId=en&callId=456&furtherCalls=yes>

A co-operation model - The Card's implementation in a multi-level administrative system	
Topic	Description
	<p>ensuring the growth of the number of service providers acknowledging the Card through the organisation of events, particularly in the tourism and sport sectors.</p> <p>In the German-speaking Community, all the major service providers in the sectors of culture, leisure and sport were reached and currently participate in the Card. Most of the service providers involved already offered benefits to persons with disabilities prior to the introduction of the Card and subsequently joined the Card's scheme. Most recently, the local football club league became a partner of the Card.</p>
Monitoring	<p>There is no planning for a monitoring system on the number of service providers participating in the Card system. According to Multi-Post, a unique way for ensuring a monitoring system of the Card's use would be to have an electronic format of the Card that registers where the Card is used. By doing so, it would be possible to link the usage of the Card with the service provider where the Card is used.</p>
Overall comments about the EU Disability Card	<p>The Steering Committee collaborated with the aim of facilitating the application to the Card by ensuring that any of the five public institutions in the field of disability can manage the applications. In Belgium, the focus is not only on providing price reductions on the services accessed by the person with disability, but also facilitating accessibility to promote the social inclusion of persons with disabilities.</p> <p>Another important aspect of the Belgian Card system is the involvement of civil society organisations from the beginning of the project to receive feedbacks from their side on the challenges identified by the Steering Committee. The Steering Committee developed a brochure with information about the types of benefits that could be offered to persons with disabilities, including accessibility services. The brochure was shared with relevant civil society organisations. Moreover, the civil society organisations indicated some of the service providers that the Steering Committee could start contacting.</p>

Bottom-up stakeholder consultation	
Topic	Description
Approach in the consultation	<p>The CCOD was informed about the project with a letter of the DCNO informing them that they had already contacted service providers for the project. Hence, they required a separate meeting, to tell them that they had never agreed for the introduction of the Card in CY.</p> <p>The CCOD feels that the DCNO was expecting from CCOD just to accept the decisions which were already taken before the respective meeting.</p> <p>The DCNO believes the attitude of CCOD was negative from the very beginning. This attitude - says the DCNO - hindered the implementation of the project in the way of a delay of the project.</p>
Definition of disability	<p>The DCNO and the CCOD disagreed on the definition of disability regarding the beneficiaries of the Card.</p> <p>The CCOD noted the non-compliance with the provisions of the Convention of the Rights of Persons with Disabilities.</p> <p>In particular, the implementation of the service did not match the philosophy, the letter and the spirit of the UN CRPD.</p>
Disability assessment	<p>The CCOD rejected the assessment procedures based on ICF, since it is not based on the social model of disability proposed in the UN CRPD. The ICF approach is still too medical for them.</p>
Eligibility criteria	<p>The eligibility criteria sparked disagreements as CCOD initially insisted that all persons with disabilities (including also mild disabilities) should have been eligible for the card while SPs were reserved on the number of Cardholders they would actually be capable of offering benefits to.</p> <p>The DCNO decided on eligibility for persons with moderate, severe or complete disability. The CCOD deemed this not satisfactory.</p>

Bottom-up stakeholder consultation	
Topic	Description
Accessibility	According to CCOD, the services covered by the project are not accessible to persons with disabilities and until today only a few actions have been undertaken to make these services accessible. This is especially contrasting with the initial plan to have the Card only for persons with severe disabilities.
Benefits provided	The DCNO prepared a catalogue of benefits which the CCOD initially did not agree with. After intensive intervention by the latter, the DCNO drafted a new catalogue of benefits once again without further consultation. The CCOD believes that the way it was designed, the initiative would not help improve the cultural and societal participation of persons with disabilities. For instance, the benefits available for pensioners are far wider and more inclusive than the ones provided by the Card

A case of administrative complexity – The prior notice obligation	
Topic	Description
Reasons apply/not apply to to	<p>The Cardholders found out about the Card from TV advertisements and directly from the DCNO website. They decided to apply because: (i) they found the benefits offered, especially the international ones, interesting and attractive, and (ii) because at a national level no such Card existed, besides the disability certificate which is not easily recognised and accepted. The certificate provided some benefits, but only within some institutions and there was no certainty it would be accepted. They felt the Card encouraged them to travel abroad.</p> <p>The non-Cardholders did not apply for various reasons: (i) they just found out about the Card's existence from friends who already had it, (ii) because they did not feel that they needed it, (iii) because they did not trust that the promised benefits would be actually granted. Overall, awareness-raising for the Card was insufficient according to their opinions.</p>
Card use	<p>The Cardholders reported a very good experience using the Card abroad in Italy, and other countries not participating in the programme. The Card is easily recognised abroad. At a national level, opinions are mixed. While one Cardholder had no issues in Romania, the other reported on multiple occasions that the Card was not easily accepted.</p>
Website consultation	<p>Cardholders consulted the website regularly to check for updates. One checked the website before applying and was satisfied with the information provided. One non-Cardholder consulted the website, found the information relatively clear, but did not trust whether in practice it would be respected in Romania, given past experiences.</p>
National and International events/benefits and website updating	<p>The DCNO reported that the national events pages were created to promote specific time-limited benefits available at the national and international level (exhibitions, festivals, concerts etc.), in order to stimulate the Card's take-up rate. The low number of events was partly due to lack of information regarding the capacity of events to host persons with disabilities, as well as lack of accessibility of services in general in Romania, in spite of legislation requirements. In addition, there was no system in place for service providers to communicate specific events directly. The DCNO did the desk research to search for specific events when the time allowed. The lack of hired personnel to update the website regularly also lead to certain errors in the information shared on the websites (e.g. specifying that some benefits and events are available only to persons with severe and moderate disabilities; inaccurate dates etc.).</p> <p>Cardholders had mixed views on how often these events are updated. One Cardholder reported having checked regularly for new events. However, the number of events advertised was highly insufficient. And many of those advertised at a national level lacked accessibility standards. Non-Cardholders did not check the events pages.</p> <p>The DCNO reported that they recruited service providers first through the local councils, and when not successful, they contacted service providers individually. Bucharest service providers are missing from the website because they did not cooperate well with the local councils in the capital city. Cardholders also reported worse experiences in Bucharest.</p> <p>Regarding international benefits and events, the DCNO reported that they collected information through desk research, browsing the websites of other Member States and international service providers.</p>
Card recognition	<p>The DCNO reported receiving complaints regarding the Card's recognition by service providers only from national Cardholders being refused benefits in Romania. Cardholders had mixed experiences at the national level, but good experiences at the international level. At the national level, in some cases, the decision of whether to offer the benefits is up to the discretionary choice of the employees of service providers.</p>
Importance of extending the programme	<p>All Cardholders and non-Cardholders strongly welcome the opportunity of being able to use the Card in more EU Member States.</p>
Communication among DCNOs	<p>The DCNO reported that they believe it would be extremely important to have a system to facilitate communication with other DCNOs. They proposed a monthly newsletter or platform where events, updates, best practices, and specific issues could be shared among them.</p>

17. Context analysis

To analyse the Card's transferability, it is crucial to understand the socio-cultural context in each Member State, preceding and at the time the Card was introduced. Since CY, MT and SI pioneered the Card project between July and November 2017, the overall contextual analysis will focus on 2016 the latest, and, thus, before any Member State had issued the Card.

17.1. Socio-economic conditions

The **cultural participation** of a population is directly related to its social conditions. In the context of this study, three main indicators of **social conditions** are being used: the risk of poverty or social exclusion rate, income distribution and social expenditure. Hence, this section provides information on such indicators in the eight Member States participating to the pilot project.

The **risk of poverty or social exclusion** rate is defined as the rate of persons in the population who are at risk of poverty or severely materially deprived or living in households with very low work intensity. Based on the Eurostat definition⁶⁷⁵, «at risk-of-poverty are persons with an equivalised disposable income below the risk-of-poverty threshold, which is set at 60% of the national median equivalised disposable income (after social transfers)». Note that the risk of poverty rate does not measure wealth or absolute poverty, but low income in comparison to other residents in that country. «Material deprivation⁶⁷⁶ covers indicators related to economic strain and durables. Severely materially deprived persons have living conditions severely constrained by a lack of resources, experience at least four out of the nine following deprivations: cannot afford to i) pay rent or utility bills, ii) keep home adequately warm, iii) face unexpected expenses, iv) eat meat, fish or a protein equivalent every second day, v) spend a week holiday away from home, vi) own a car, vii) own a washing machine, viii) own a colour TV, or ix) possess a telephone. People living in households with very low work intensity⁶⁷⁷ are those aged 0-59 living in households where the adults (aged 18-59) work 20% or less of their total work potential during the past year». The most recent data on the risk of poverty per Member State before the Card's implementation date in 2016⁶⁷⁸. As shown in Table 105, while Member States like FI and SI have less than 20% of their population at risk of poverty or social exclusion, other Member States (BE, EE and MT) have levels around 20-25%. The highest rates are found in CY (27.7%), IT (30%) and RO (38.8%)⁶⁷⁹. Compared to the general population, persons with disabilities are disadvantaged to varying degrees according to their MS in terms of risk of poverty or social exclusion. In RO, persons with disabilities are at a higher risk of poverty by less than one percentage point while those in EE are around 15 percentage points more likely to experience poverty. The divergences are substantial in all participatory Member States except IT and RO, especially considering that the data already takes social transfers into account. These sources will be combined to estimate the impact the Card has in mitigating the risk of poverty gap. For instance, the analysis will look at the number of times Cardholders in the eight Member States went to a cinema at which the Card provided a price reduction. Then, the analysis will see at the savings rate compared to full ticket prices. This will allow for an estimation of the increased purchasing power that persons with disabilities could gain thanks to the Card.

⁶⁷⁵ See at: https://ec.europa.eu/eurostat/web/products-datasets/-/t2020_50&lang=en.

⁶⁷⁶ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Material_deprivation.

⁶⁷⁷ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Persons_living_in_households_with_low_work_intensity.

⁶⁷⁸ See at: https://ec.europa.eu/eurostat/databrowser/view/t2020_50/default/table?lang=en.

⁶⁷⁹ See at: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=hlth_dpe010&lang=en

Table 105 - Population at risk of poverty or social exclusion in 2016

MS	% of the general population	% of the population with some or severe limitation
BE	20.7	33.0
CY	27.7	35.7
EE	24.4	39.4
FI	16.6	23.5
IT	30.0	31.0
MT	20.3	32.6
RO	38.8	39.4
SI	18.4	24.6

The inequality of **income distribution** referred to 2016 (Table 106) is measured by the income quintile share ratio, defined as the ratio of total income received by the 20% of the population with the highest income (top quintile) to that received by the 20% of the population with the lowest income (lowest quintile)⁶⁸⁰. Income must be understood as equivalised disposable income. As shown in Table 106, BE, FI and SI have the least unequal income distribution. In CY and MT, the richest 20% cumulatively have respectively 4.9 and 4.2 times the income of the bottom 20% considered altogether. EE is scoring slightly worse, with a value of 5.6. IT and RO have the most unequal systems, with 6.3 and 7.2 times the total income ratio of the top 20% versus the bottom 20%.

Table 106 - Inequality of income distribution in 2016⁶⁸¹

MS	Total income of top 20% / Total income of bottom 20%
BE	3.8
CY	4.9
EE	5.6
FI	3.6
IT	6.3
MT	4.2
RO	7.2
SI	3.6

The **social expenditure** indicator looks at the social expenditure as a percentage of the Gross Domestic Product (GDP), adjusted for the different levels of wealth in the eight Member States, and at the share of social benefits directed to persons with disabilities. "Expenditure on social protection"⁶⁸² includes: social benefits, administration costs (that represent the costs charged to the scheme for its management and administration) and

⁶⁸⁰ See at: <https://ec.europa.eu/eurostat/web/products-datasets/product?code=tespm151>.

⁶⁸¹ See at: <https://ec.europa.eu/eurostat/databrowser/view/tespm151/default/table?lang=en>.

⁶⁸² See at: https://ec.europa.eu/eurostat/statistics-explained/index.php/Social_protection_statistics#Per_capita_expenditure_on_social_protection_and_expenditure_as_percentage_of_GDP.

other expenditures (that consists of miscellaneous expenditures by social protection schemes, principally payment of property income).

Social protection benefits are direct transfers, by social protection schemes to households or individuals. Social protection benefits are into:

- “Sickness/healthcare benefits — including paid sick leave, medical care and the provision of pharmaceutical products;
- Disability benefits — including disability pensions and the provision of goods and services (other than medical care) to persons with disabilities;
- Old age benefits — including old age pensions and the provision of goods and services (other than medical care) to the elderly;
- Survivors’ benefits — including income maintenance and support in connection with the death of a family member, such as a survivors’ pensions;
- Family/children benefits — including support (except healthcare) in connection with the costs of pregnancy, childbirth, childbearing and caring for other family members;
- Unemployment benefits — including full or partial unemployment benefits as well as vocational training financed by public agencies;
- Housing benefits — including interventions by public authorities to help households meet the cost of housing;
- Social exclusion benefits not elsewhere classified (n.e.c.) — including income support, rehabilitation of alcohol and drug abusers and other miscellaneous benefits (except healthcare).”

Table 107 summarises the social expenditure as percentage of GDP and the percentage of the social expenditure for disability, referred to the year 2016.

Table 107 - Social expenditure in 2016

MS	Social expenditure as % of the GDP ⁶⁸³	% of the social expenditure for disability ⁶⁸⁴
BE	29.2%	8.7%
CY	19.4%	4.4%
EE	16.6%	11.6%
FI	31.6%	9.6%
IT	29.4%	5.8%
MT	16.6%	3.5%
RO	14.6%	6.5%
SI	23.3%	4.8%

⁶⁸³ See at: <https://ec.europa.eu/eurostat/databrowser/view/tps00098/default/table?lang=en>.

⁶⁸⁴ See at: <https://ec.europa.eu/eurostat/web/social-protection/statistics-illustrated>.

In BE, FI, and IT, social expenditure corresponds to around 30% of their GDP. CY spends slightly less than 20% of its GDP and SI around 23% of its GDP, whereas EE, MT, and RO dedicate only around 15% of their GDP for social expenditure. CY and MT are the Member States spending the lowest share on disability. BE, EE and FI distinguish themselves to direct a significant amount of social benefits to persons with disabilities.

17.2. Education level

Another important indicator affecting cultural participation is the **education level** of the population (Table 108). The data shown are the annual averages of the quarterly EU Labour Force Survey (EU-LFS) data for 2016, as already provided by Eurostat⁶⁸⁵, the last full year before the pilot project. Eurostat defines the education attainment level⁶⁸⁶ of an individual as «the highest International Standard Classification of Education (ISCED) level successfully completed, the successful completion of an education programme being validated by a recognised qualification, i.e. a qualification officially recognised by the relevant national education authorities or recognised as equivalent to another qualification of formal education». The Member States with the highest share of its citizens with tertiary education are CY, FI, EE and BE (37.6%, 35.9%, 34.1%, 33.2% respectively). In SI, around 27% of the population have tertiary education. The Member States with the lowest share of university graduates are MT (around 20%), IT and RO (around 15%). By gender, the female population is consistently more educated than the male population, for every MS (Table 109). In three Member States, (CY, EE, and FI) more than 40% of females hold a university degree.

Table 108 - Population 15-64 years of age by educational level, in 2016⁶⁸⁷

MS	Education level		
	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)
BE	28.2%	38.6%	33.2%
CY	24.0%	38.3%	37.6%
EE	16.7%	49.3%	34.1%
FI	18.6%	45.5%	35.9%
IT	41.6%	42.7%	15.7%
MT	47.9%	31.8%	20.3%
RO	28.0%	56.9%	15.1%
SI	17.2%	55.6%	27.2%

⁶⁸⁵ See at : https://ec.europa.eu/eurostat/cache/metadata/en/edat1_esms.htm.

⁶⁸⁶ See at: https://ec.europa.eu/eurostat/cache/metadata/en/edat1_esms.htm#meta_update1512048381182.

⁶⁸⁷ See at: http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=edat_lfse_03&lang=en, table "Population by educational attainment level, sex and age (%) - main indicators."

Table 109 - Population of 15-64 years of age by educational level and gender in 2016⁶⁸⁸

MS	Male			Female		
	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)
BE	29.3%	40.8%	30.0%	27.1%	36.4%	36.5%
CY	25.4%	42.3%	32.3%	22.8%	34.7%	42.5%
EE	20.4%	54.2%	25.4%	13.0%	44.4%	42.6%
FI	20.7%	49.3%	30.0%	16.4%	41.7%	41.9%
IT	43.7%	42.9%	13.4%	39.5%	42.6%	17.9%
MT	49.0%	31.9%	19.1%	46.6%	31.6%	21.7%
RO	26.3%	59.5%	14.2%	29.8%	54.2%	16.0%
SI	16.4%	62.1%	21.4%	18.1%	48.7%	33.2%

Table 110 - Population 15-64 years of age by educational level and activity limitation in 2011⁶⁸⁹

MS	Population without work limitation caused by a health condition or difficulties in basic activities			Population with work limitation caused by a health condition or difficulties in basic activities		
	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)
BE	28.3%	38.7%	33.1%	51.9%	32.6%	15.5%
CY	26.8%	38.0%	35.2%	47.0%	35.8%	17.2%
EE	17.3%	50.0%	32.7%	23.5%	55.1%	21.0%
FI	21.2%	43.9%	34.9%	26.8%	48.2%	25.1%

⁶⁸⁸ See at : http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=edat_lfse_03.

⁶⁸⁹ See at : https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=hlth_de040&lang=en.

MS	Population without work limitation caused by a health condition or difficulties in basic activities			Population with work limitation caused by a health condition or difficulties in basic activities		
	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)	Less than primary, primary and lower secondary education (levels 0-2)	Upper secondary, post-secondary non-tertiary education (levels 3-4)	Tertiary education (levels 5-8)
IT	43.8%	42.5%	13.7%	63.9%	29.7%	6.4%
MT	53.9%	30.1%	16.0%	79.1%	15.0%	5.9%
RO	28.2%	58.2%	13.6%	40.7%	54.8%	4.4%
SI	17.2%	58.4%	24.4%	29.0%	57.8%	13.2%

In BE and CY, those with and without work limitations experience the greatest divergences in educational attainment (Table 110). Rather, the difference in educational attainment between those with and without work limitations in FI, SI, and EE is around 10%. The educational attainment for those with work limitations is lowest in IT, RO, and MT, where below 7% finish tertiary education. The low levels of education among those with work limitation and the gap compared to the general population are important factors to consider when analysing the post-Card change in cultural participation. If lower educational attainment is correlated with a lower appreciation or inclination for various cultural activities (e.g. opera, theatre etc.), then providing free or discounted entrances may not generate the expected increase in cultural participation. These aspects are highly relevant when considering the Card's transferability across other Member States with varying levels of education among the target population.

17.3. Cultural activities: culture and leisure

Cultural participation itself might differ significantly across the eight Member States, and we might expect the Card to have a different impact depending on the pre-existing levels of participation. The results presented in Table 111 are based on the 2015 ad-hoc module on social and cultural participation as part of EU-SILC⁶⁹⁰. The next EU-SILC cultural participation module is programmed for 2022. The most recent available dataset is from 2015.

The survey included the following variables on cultural participation:

- Going to the cinema (leisure);
- Going to live performances — i.e. plays, concerts, operas, ballet, dance performances, etc. Street performances were also included, but only if they were organised events. For example, if the respondent listened to a busker on the street,

⁶⁹⁰ See at: <https://ec.europa.eu/eurostat/documents/3859598/9433072/KS-GQ-18-011-EN-N.pdf/72981708-edb7-4007-a298-8b5d9d5a61b5>.

this was not counted, but if the respondent attended a concert in a park, this was included (leisure);

- Visits to cultural sites — i.e. historical monuments, museums, art galleries, archaeological sites, etc. Visits (either planned or spontaneous) were included only where the purpose was to become acquainted with the cultural or historical content of the site (culture).

Table 111 - Participation in cultural activities at least once in the previous 12 months at 2015, (% of population aged 16 and over)⁶⁹¹

MS	General population				Population with some or severe disabilities,		
	Overall	Cinema	Live performance	Cultural sites	Cinema	Live performance	Cultural sites
BE	68%	50%	45%	43%	27.6%	29.1%	27.1%
CY	53%	31%	43%	21%	9.4%	21.6%	10.6%
EE	70%	48%	56%	44%	24.4%	37.6%	28.6%
FI	84%	55%	67%	61%	37.4%	54.7%	51.1%
IT	47%	38%	25%	26%	16.9%	14.6%	15.2%
MT	51%	34%	30%	26%	7.5%	10.7%	11.7%
RO	27%	19%	21%	18%	6.4%	10.7%	9.7%
SI	70%	37%	57%	44%	17.7%	41.8%	32.2%

BE, EE, FI and SI have participation rates of over 70%, whereas CY, IT and MT have around half of the population participating in any cultural activity (Table 111). RO is the only Member State where less than 30% of the population participated in cultural activities in the previous 12 months.

Participation in cultural events reveals a dramatic drop in rates between those with mild and those with severe disabilities for all eight Member States, demonstrating a need for projects, such as the Card, to address the gap.

17.4. Sports

In order to understand the importance played by sport and physical activities in each Member State, looking at the proportion of the population practicing in sport, fitness or recreational (leisure) physical activities at least once a week can help (Table 112). In the last wave of the European Health Interview Survey (EHIS), conducted around 2014⁶⁹², data on type and frequency of physical activity were collected. The survey reported, “non-work-related physical activity includes sport, fitness recreational (leisure) physical activities that cause at least a small increase in breathing or heart rate) as well as cycling used for commuting to get to and from places for at least ten minutes continuously without interruption.”

⁶⁹¹ See at: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Table_1_Participation_in_cultural_activities_at_least_once_in_the_previous_12_months,_2015_\(%25_of_population_aged_16_and_over\).png](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Table_1_Participation_in_cultural_activities_at_least_once_in_the_previous_12_months,_2015_(%25_of_population_aged_16_and_over).png).

⁶⁹² See at: https://ec.europa.eu/eurostat/cache/metadata/en/sprt_pcs_esms.htm.

Furthermore, participation in live sport events (Table 113), which can be very culture-related, is considered. Instead, data on attending live sport events were retrieved in the 2015 wave of EU SILC. The reference period is the previous 12 months.

FI, MT, and SI are the Member States with the highest proportions of the population engaging in sport activities at least once a week, each over 50%. CY and EE have more than one person out of three practising sport regularly, whereas IT and RO have the least physically active population (26% and 5%, respectively).

In IT and RO less than one out of five has participated in a live sport event in the last 12 months, whereas in CY and MT around one out of five has. BE, EE and SI have a participation in sport events of approximately 30% of the population. FI is the Member State with the highest levels of participation, with 48% of the population having participated in a live sport event in the previous year.

Table 112 - Practising sport, fitness or leisure physical activities, in 2014

MS	General population ⁶⁹³			Population with some or severe limitation ⁶⁹⁴		
	Aerobic and muscle-strengthening activity	Aerobic activity	Muscle-strengthening activity	Aerobic and muscle-strengthening activity	Aerobic activity	Muscle-strengthening activity
BE	n.a.			n.a		
CY	5.3%	25.3%	7.8%	2.2%	17.1%	3.8%
EE	5.6%	23.2%	12.3%	3.2%	16.3%	7.4%
FI	27.4%	54.6%	35.8%	22.8%	46.3%	32.2%
IT	<u>7.6%</u>	18.2%	11.8%	3.1%	8.5%	6.2%
MT	5.2%	34.9%	6.9%	2.4%	23.7%	3.1%
RO	0.8%	8.6%	0.9%	0.1%	2.4%	0.1%
SI	19.4%	37.9%	30.2%	14.3%	27.9%	27.6%

Table 113 - Attendance of a live sport event in the previous 12 months, in 2015⁶⁹⁵

MS	% of the general population (2015) ⁶⁹⁶	% of the population with mild or severe limitation
BE	31%	18.7%
CY	23%	7.8%
EE	28%	14.3%
FI	48%	31.9%
IT	19%	9.5%
MT	22%	6.5%
RO	16%	6.9%
SI	31%	18.4%

Fewer persons with severe disabilities participate in physical activities or attend sport events than those with mild disabilities as we might expect. However, Member States, again, vary

⁶⁹³ See at: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=hlth_ehis_pe9e&lang=en.

⁶⁹⁴ See at: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=hlth_ds010&lang=en.

⁶⁹⁵ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Statistics_on_sport_participation.

⁶⁹⁶ See at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Statistics_on_sport_participation.

significantly in this regard. Some present a relatively small participation gap based on disability severity (FI, SI) while for others the gap is more substantial (CY, IT). Regarding participation in live sport events, the gap between those with disabilities and the general population in BE, FI and SI is less than half while the gap is larger in other participating Member States.

17.5. Public and private transport

As the Card also offers services in the transport sector, it is necessary to take a look at the extent to which public transport is used (Table 114). Unfortunately, Eurostat provides information only on rail transport, while local transportation services might be better covered by national statistics.

Eurostat defines a rail transport passenger⁶⁹⁷ as any person, excluding members of the train crew, who makes a journey by rail.

Table 114 - Rail transport passengers, in thousands⁶⁹⁸

MS	Thousands of passengers, 2016	Thousands of passengers, 2017	Thousands of passengers, 2018
BE	Missing	Missing	Missing
CY	Missing	Missing	Missing
EE	6,926	7,433	7,759
FI	82,114	85,703	87,502
IT	869,199	864,570	882,243
MT	Missing	Missing	Missing
RO	64,455	69,056	66,500
SI	13,650	13,002	13,105

17.6. Tourism

With respect to tourism, the habits of a population might depend not just on their income level, but also on their culture, the size of their country and the availability of transport services. In small Member States like CY and EE, it is more likely that its citizens will prefer to practice tourism abroad. In international rankings of abroad-travelling behavior, mainly countries with total areas below 50,000 km² make the top 10. Furthermore, the better accessibility and ease of transportation have played a role in increasing the tourism worldwide⁶⁹⁹. The data shown below are collected by the Member States in the frame of the [Regulation \(EU\) No 692/2011](#) of the European Parliament and of the Council concerning European statistics on [tourism](#). The population considered are residents of the country, aged

⁶⁹⁷ See at: https://ec.europa.eu/eurostat/cache/metadata/en/rail_pa_esms.htm.

⁶⁹⁸ See at: https://ec.europa.eu/eurostat/databrowser/view/rail_pa_total/default/table?lang=en.

⁶⁹⁹ Culpan, R. (1987) International tourism model for developing economies, *Annals of Tourism Research*, Vol. 14, 541-552, Honey, M. (1999) *Ecotourism and sustainable development: Who owns paradise?* Island Press, Washington DC.

15 or over, and touristic trips are only those for personal purposes, excluding professional reasons, which included at least one overnight stay.

As shown in Table 115, when looking at tourist trips in 2016, small Member States like BE, MT and SI have low rates of internal tourism (14.5%, 12.8%, and 4% respectively). All the other Member States have internal tourism rates in the 23-30% range. Instead, if the entire world is considered as a tourist destination, nationals from BE, MT and SI become more prone to travelling (rates around 60%). The Member States whose residents travel abroad less frequently are IT and RO (41.9% and 24% respectively). Almost 7 citizens out of 10 from CY and EE do travel abroad yearly, as well as the vast majority of citizens from FI (91.5%).

Table 115 - Participation in tourism for personal purposes in 2016, with at least one night spent away from the usual place of residence⁷⁰⁰

MS	% of the population travelling within their MS (domestic destination)	% of the population travelling in all Countries of the world
BE	4.0%	58.5%
CY	24.3%	69.6%
EE	23.3%	68.7%
FI	29.8%	91.5%
IT	26.2%	41.9%
MT	14.5%	59.7%
RO	22.4%	24.0%
SI	12.8%	66.6%

17.7. Analysis of the factors influencing the participation gaps

The EU-Statistics on Income and Living Conditions (EU-SILC) 2015 ad-hoc module on social and cultural participation is the best source of information on the gap in cultural and leisure participation between persons with disabilities and persons without disabilities before the implementation of the pilot action. Assessing the size of the gap and its possible determinants is a key step in understanding the magnitude of existing needs and the specific target groups for which a higher impact is strongly desired. For instance, if a lower socio-economic status explains most of the gap in cultural participation, then there is a desire for the Card to make a bigger impact on Cardholders with a low socio-economic status since they would represent a target group more in need of support.

To perform this analysis, two sets of variables have been used: (i) participation rates in cultural and sport events, and leisure activities in the previous 12 months, and (ii) a wide set of socio-economic and demographic characteristics. The analysis is restricted to the eight Member States participating in the pilot action, represented by a sample of 138,846 individuals.

⁷⁰⁰ See at: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=tour_dem_totot&lang=en.

Given the low participation rates among both persons with disabilities and the general population, and in order to be consistent with the second round of the online survey, all the variables indicating participation rates in the targeted sectors have been 'simplified' into two categories: (a) individuals who did not attend such activities and (b) individuals who attended such activities at least once. Unfortunately, the survey does not include any information on tourism abroad, but it does measure whether individuals attended cultural or sport events, life performances, went to the cinema, or engaged regularly in leisure activities in the previous 12 months.

Disability status is proxied through the EU-SILC question on activity limitations in the previous six months. Since all the Member States participating in the pilot action also included moderate disabilities in their eligibility criteria, the focus is on persons living with either moderate or severe disabilities in this analysis. Respondents reported (22.7%) at least a moderate activity limitation in the past six months.

The socio-economic and demographic variables were grouped into several blocks to simplify the analysis:

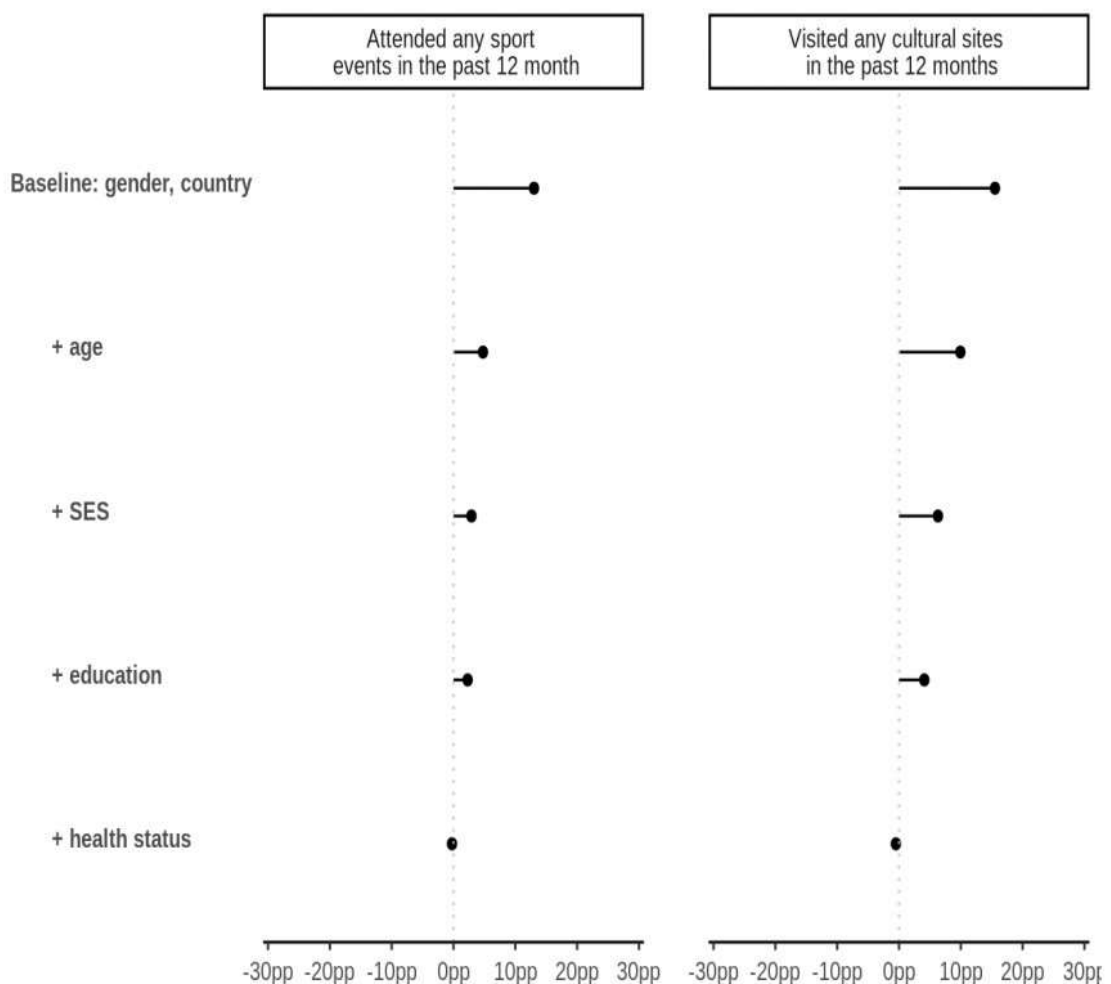
- Country;
- Gender;
- Age;
- Socio economic condition (SES): including marital status, household size, and employment status;
- Educational attainment (all EU-SILC categories);
- Self-reported health status.

In order to understand how these socio-economic and demographic characteristics explain the gap between persons with disabilities and persons without disabilities, multivariate regression models have been used, to enable a comparison of the participation rates between the two groups after controlling for the socio-economic and demographic characteristics. For each outcome variable, five models have been fitted, sequentially introducing the groups of variables presented above, starting with the baseline model, where only the country of residence and gender are included, and ending with the complete model which controls for country of residence, gender, age, SES, education, and health status. The gap in percentage points between the population with and without disabilities, for each of the selected outcome variables, is presented separately for each of the sequential models in the figure below (Figure 88).

Starting with participation in sport events, a gap of about 14 percentage points can be observed before controlling for other characteristics (28.8% of the persons without disabilities attended at least one sport event, among persons with disabilities only 14.2%). However, after comparing persons with disabilities and those without in the same age groups, the gap shrinks to about 5 percentage points. Thus, a large share of the gap is explained by the fact the persons with moderate or severe activity limitations are much older on average, and the fact that older age is associated with lower participation in sport events. Furthermore, after controlling also for SES and education, the gap decreases further, completely closing when introducing health status as well. Thus, to conclude, the gap between the two groups in sports participation is fully explained by the fact that persons with disabilities are older, with a lower socioeconomic status, lower educational levels, and in worse health conditions. As a result, a more impactful Card is expected to significantly reduce the existing gap in sport participation.

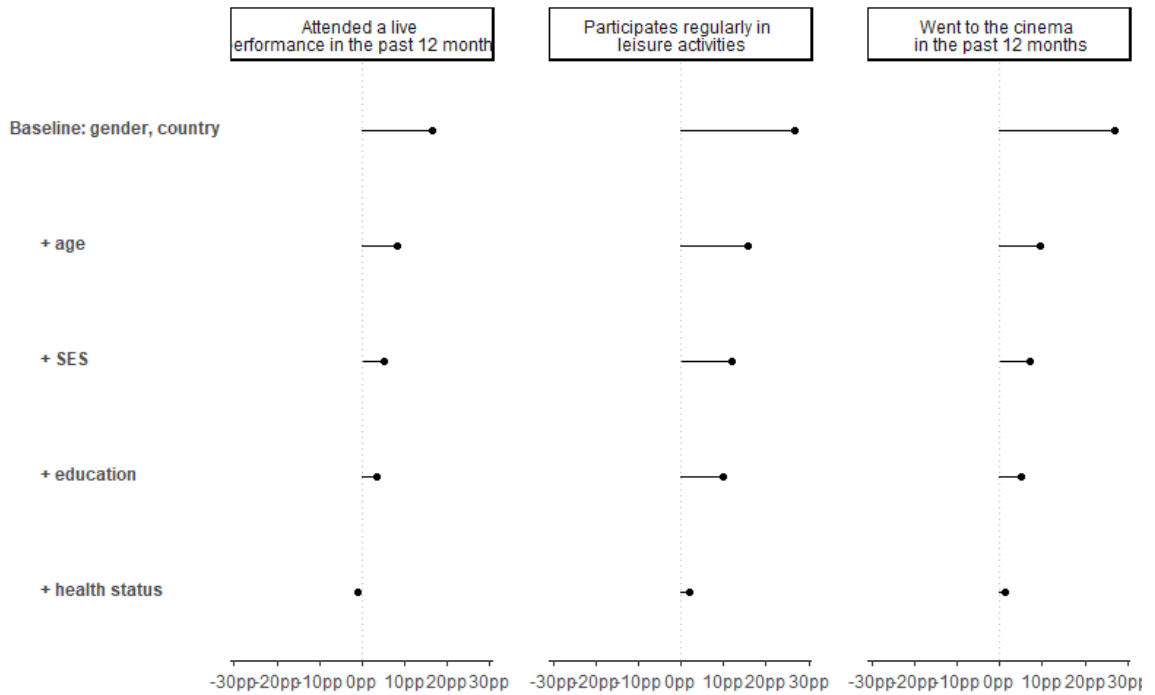
With respect to cultural participation rates in the past 12 months, an even larger gap is observed of about 25 percentage points (Figure 88). Similar to sport participation, the gap is fully explained by the considered socioeconomic and demographic characteristics. This pattern is consistent for all the other outcomes (Figure 89), strengthening the main findings: the gaps in participation rates between persons with disabilities and those without can be fully explained by differences in socioeconomic and demographic characteristics. To more effectively close the gap, the Card should aim to have a stronger impact on the elderly, those less educated, with less favorable socioeconomic conditions and with stronger health limitations. By design, the Card addresses the economic issue to some extent by providing free or discounted tickets to individuals who cannot afford to benefit from such services otherwise. However, ways to make the program more accessible for the elderly and those with lower educational levels, for instance, should be considered as well. Simplifying the application process and how information is presented and offering services which may appeal to wider populations are important elements to consider.

Figure 88 – Regression models: factors explaining the gaps in sport event attendance, and in visiting cultural sites.



Source: Author's elaboration based on EU-SILC 2015 micro data of the eight participating Member States

Figure 89 - Regression models: factors explaining the gaps in live performance attendance, leisure activities, and in going to the cinema.



Source: Author's elaboration based on EU-SILC 2015 micro data of the eight participating Member States

18. SWOT analysis

The following SWOT analysis focuses on the main features of the pilot implementation of the Card. Due to limited availability of (i) monitoring data on the use of the Card at the national level and (ii) administrative data on Cardholders' socio-economic background, specific features of each national experience are not covered; rather, the analysis below considers the core features common to most pilot Member States.

Category	Feature of the policy
Strengths	<ul style="list-style-type: none"> • Universalism of the measure, as each person with disabilities is eligible to the benefits of the Card⁷⁰¹.
	<ul style="list-style-type: none"> • Reduction of physical, economic, social and cultural disparities between persons with disabilities and the remaining population.
	<ul style="list-style-type: none"> • Increased social cohesion and levels of social integration.
	<ul style="list-style-type: none"> • Very low implementation costs per beneficiary over the long term.
	<ul style="list-style-type: none"> • Increased awareness of the needs of persons with disabilities by participating service providers, at least in the culture and leisure sectors.
Weaknesses	<ul style="list-style-type: none"> • Limited capacities of some DCNOs to fully implement the measure and low levels of the take-up rate (weak communication process, lack of cooperation with other DCNOs).
	<ul style="list-style-type: none"> • Low level of participation in the measure by the service providers, particularly in the transport and sport sectors.
	<ul style="list-style-type: none"> • Some disadvantaged categories, such as the younger and the unemployed, benefit less than others from the Card.
	<ul style="list-style-type: none"> • Lack of monitoring on the use of the Card and the satisfaction levels of Cardholders.
Opportunities	<ul style="list-style-type: none"> • Mutual recognition of disability status across the Member States involved in the pilot study, extendible to other sectors.
	<ul style="list-style-type: none"> • Increasing homogeneity of treatment of persons with disabilities across participant Member States.
	<ul style="list-style-type: none"> • EU financial support to the Member States, at least during the first stage of the implementation process
	<ul style="list-style-type: none"> • Support to service providers to increase the accessibility of their services even further that in turn would increase the satisfaction and use of the Card by the beneficiaries.
Threats	<ul style="list-style-type: none"> • Possible additional costs for service providers that do not receive subsidies.
	<ul style="list-style-type: none"> • Possible additional costs for service providers for adapting to accessibility standards.
	<ul style="list-style-type: none"> • Low cultural and sport participation, and tourism abroad of persons with disabilities even with the Card since several additional socio-economic factors may impede them from engaging in these activities.

⁷⁰¹ It does not apply to each Member State, as for instance, in CY, only moderate, severe and complete disabilities are included.

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