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Malta

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European Disability Expertise (EDE) provides independent scientific support to the Commission's policy Unit responsible for disability issues. It aims to mainstream disability equality in EU policy processes, including implementation of the United Nations Convention on the Rights of Persons with Disabilities.

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¹ For an introduction to the Semester process, see:
<https://www.consilium.europa.eu/en/policies/european-semester/how-european-semester-works/>.

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1 Executive summary and recommendations

1.1 Key points and main challenges for Malta in 2022

Disability and the labour market

The employment rate of persons with disabilities in Malta is still lower than the EU average (46.1 % vs EU 50.3 % in 2020). The national disability strategy dedicates its Objective 9 to employment. However, to date, no information is available on the Disability Strategy's implementation or impact. Some of the actions by the National Commission for the Rights of Persons with Disability include regular disability equality training (DET) for employers and awareness raising about persons with disabilities and employment, such as the project *Ċavetta għall-Futur* (A Key to the Future) (see Section 3.2). Another issue regarding employment is that the 2 % quota is still not applicable to small companies (see Section 1.2: Recommendations).

Disability, social policies and healthcare

Social policy and services: fragmentation of disability services is one of the causes for lack of continuity of such services. The Disability Strategy's aim to issue a report and an action plan regarding this issue in five years' time is concerning.

Health: concrete measures need to be taken with regard to health promotion, including surrounding sexuality and sexual relationships, such as sexual education and accessibility to health and services.

Disability, education and skills

Children in vulnerable and marginalised situations, continue to face barriers in their access to quality education, including owing to delays in the registration of asylum applications or to the lack of reasonable accommodation for children with disabilities in mainstream schools. It is debatable whether disability-specific units set up in mainstream schools are truly promoting inclusion, or whether they are being used as exclusionary spaces for students with disabilities who create challenges for the current education system. The rights of students with disabilities have been further strengthened through the incorporation of the UN CRPD (including Article 24 on Education) into Maltese law through the UN CRPD Act (Cap. 627). Another significant legislative change is the new Education Act (Cap. 605) which replaces the older Education Act (Cap. 327). Most of the articles in the latter act have now been repealed.

Investment priorities for inclusion and accessibility

The 2022 budget speech indicates the Maltese Government's commitment to address the needs of persons with disabilities. Allowances for people with disabilities, especially those who cannot work, and allowances for parents of children with disabilities and those caring for severely disabled adult family members, have been increased again. The severe disability allowance will no longer be means tested. The eligibility criteria for exemptions and deductions for adapted vehicles have been widened, and an occupational therapy service aimed at reducing waiting lists for children with disabilities has been established. However, all future investment projects need to mainstream disability issues rather than retrospectively implementing special arrangements and accommodations for persons with disabilities.

1.2 Recommendations for Malta

These recommendations are based on the evidence and analysis presented in the following chapters of our report.

Recommendations regarding Employment

1. Implement the 2 % employment quota for people with disabilities in smaller companies.

Rationale: This is in view of the fact that companies in Malta consist mostly of SMEs and microenterprises. This was also recommended in the previous Semester.

2. Draft a national strategy highlighting and addressing different factors related to employment conditions of individuals with disabilities.

Rationale: This was not specifically taken into account in the Disability Strategy. Research shows various barriers to mainstream employment for persons with disabilities in Malta, including lack of accessibility, stigma, and lack of awareness.

Recommendations regarding Education

1. Ensure that measures taken in the education-related components of the National Reform Programme (NRP) and the Recovery and Resilience Plan (RRP) are in line with the actions identified in Objective 7 of the National Disability Strategy.

Rationale: Now that the Freedom to Live Strategy is being implemented with a timeframe to 2030, all programmes have adequate time to implement actions that are in sync with this strategy.

2. Collect data on the inclusion of students with disabilities at all levels of education.

Rationale: This recommendation was also included in last year's Semester report and is still relevant. In addition to quantitative data, qualitative data is also necessary to provide an in-depth picture of the quality of inclusive education and its outcomes.

Recommendations regarding Social Policy

1. Increase efforts to move away from institutionalised care and invest more in community services such as personal assistance services.

Rationale: A deinstitutionalisation strategy for Malta is urgently required. This would allow persons with disabilities to live independently and participate fully and actively in society, as advocated by Article 19 UN CRPD. The National Disability Strategy has an objective of deinstitutionalisation in nine years, which is too long a timeframe.

2. Finalise a Protection of Adults in Situations of Vulnerability Bill.

Rationale: This was one of the 2018 CRPD recommendations. Without this Bill, adult persons with disabilities who cannot represent themselves will remain unprotected by law.

Recommendation regarding Investments

Promote the mainstreaming of disability issues in all sectors of life in investments.

Rationale: This practice is currently only observed in specific areas such as housing.

2 Mainstreaming disability equality in the 2022 Semester documents

2.1 Country Report (CR) and Country Specific Recommendation (CSR)

The following key points highlight where a disability perspective was considered, or should be considered, in the CR/CSR. We address the most relevant of these in the next chapters.

From the 2022 CR

The overall poverty risk remains below the EU average, but some groups face a particularly high risk. In 2020, the at-risk-of-poverty-or-social-exclusion (AROPE) rate of the total population was around 20 %, slightly below the EU average of around 22 %. However, this rate is much higher among people with disabilities, non-EU nationals, and people aged over 65 (p. 3).

Poverty figures are below the EU average in general but continue to be high for specific groups. While the AROPE rate was slightly below the EU average (19.9 % vs EU 21.6 %) in 2020, the percentage is much higher for non-EU nationals, people aged over 65, and for people with disabilities (30.1 %) than for the overall population (also see Graph 3.1) (p. 11).

In the Key Findings

Beyond the reforms and investments in the RRP, Malta would benefit from (among other things): ensuring adequate and effective social protection for disadvantaged groups and fostering social inclusion of children (p. 16).

Annex 12: Employment, skills and social policy challenges in light of the European Pillar of Social Rights

The labour market performs well but the low participation of women and other underrepresented groups (including persons with disabilities) affects labour shortages and social cohesion.

Table A12.1: Social Scoreboard for MALTA (Source: Eurostat): The Disability Employment Gap is coloured in orange, which indicates the need 'to watch'.

At 29.4 percentage points in 2020, the disability employment gap is above the EU average (24.5 percentage points), whereas the general unemployment rate (percentage of population aged 15-74) (2021) is 3.5 marked in dark green as best performer – continuing to improve from the pre-COVID-19 crisis period (p. 45).

From the 2022 CSR

There is no direct reference to disability in the CSR.

Key recommendations of relevance might include:

- targeted support to households most vulnerable to energy price hikes (p. 19);
- support to people fleeing Ukraine (p. 19);
- investment for the green and digital transition (p. 19);
- implementation of the Recovery and Resilience Plan and previous CSRs (p. 20);

- this includes reforms and investments to address the challenges identified in health, employment, education and skills (p. 15).

2.2 National Reform Programme (NRP) and Recovery and Resilience Plan (RRP)

The following key points highlight where the situation of people with disabilities or disability policies are relevant to the NRP/RRP. We analyse the most relevant of these in the next chapters.

The NRP suggests the following relevant topics are included:

- Malta's 2021-2030 National Strategy on the Rights of Disabled Persons, Freedom to Live (p. 43);
- Freedom to Live Community Grant Scheme (p. 43);
- Inclusive education (p. 43);
- Support for school leavers with a disability to bridge the gap between school and the workplace (p. 43);
- Extension of free public transport schemes (p. 12);
- Increased carer grant to parents who provide care for their severely disabled children of over 16 years of age (p. 31);
- New Hope Guarantee Scheme, Government as guarantor to enable individuals with medical issues or disabilities to become homeowners (p. 31);
- Inclusivity of people with a disability in the labour force (p. 37);
- Employment quota (p. 42);
- Training placements (EU funded) (p. 43); and
- Vocational training schemes (p. 43).

Examples from the NRP:

p. 31: The carer grant for parents of severely disabled children (over 16 years of age) was increased by EUR 300 in 2022. The carer allowance for full-time caregivers of a relative with low dependency and living within the same household was increased to EUR 7 000 per year. Whilst helping elderly persons remain in the community, this initiative also helps informal carers to remain active in the workforce.

p. 31: Persons with chronic illness or disability have serious challenges to becoming homeowners. The New Hope Guarantee Scheme of the Housing Authority means that the Government will now act as a guarantor for life insurance, which is a requirement for home loans, thus permitting persons in these categories to become homeowners. The Housing Authority will also be drawing up care plans for persons who need social housing, as from this year. These care plans will be the result of a study by the Faculty for Social Wellbeing at the University of Malta about the needs of beneficiaries of social accommodation.

p. 39: Four temporary COVID-19-related social benefits were introduced in mid-March 2020, with the provision of EUR 800 per month (EUR 500 per month for part-timers) to a number of individuals who were at an increased risk of poverty and social exclusion because of the pandemic. Persons with disabilities who were

medically vulnerable and therefore had to stay at home were eligible for the disability and medical benefit which was granted up to 5 June 2020.

pp. 42-44: Inclusive Education and Employment

...In a bid to make primary schools more dyslexia-friendly, a set of guidelines were created and disseminated in May 2020. At post-secondary level, school leavers with disabilities are provided with the necessary support to transition smoothly from school to employment.(p. 43)

With regard to employment, the enforcement of the 2 % quota legislation in 2015 has brought about the doubling of the number of persons with disabilities in the workforce over a five-year period. Amendments to strengthen the enforcement of this law were proposed last year. (pp. 43-44)

There were no direct references to disability in the summary of RRP measures published on the Commission webpage but some of the key measures of relevance might include:

- new electric buses for public transport (p. 7);
- free public transport to more than 100 000 Maltese citizens (p. 7);
- digitalisation of the public administration and public services (p. 8); and
- better vocational education and training (p. 10).

2.3 Semester links to CRPD and national disability action plans

It is important that Semester plans align with national disability strategy. In Malta, this refers to the Freedom to Live, Malta's 2021-2030 National Strategy on the Rights of Disabled Persons.² A National Policy on the Rights of Persons with Disability, was published in 2014. Following consultations, a National Strategy on the Rights of Disabled Persons 2021-2030, Freedom to Live, was launched in June 2021. This National Action Plan is mentioned in the 2022 National Reform Programme.

Relevant recommendations arising from participation in the United Nations Convention on the Rights of Persons with Disabilities (CRPD) are highlighted in the following chapters. The last UN CRPD Committee recommendations to Malta were in 2018, the most recent submission by Malta was in 2018 and the most recent response from the Committee was the 2018 Concluding Observations.

² Freedom to Live: Malta's 2021-2030 National Strategy on the Rights of Disabled People. Retrieved from: <https://inclusion.gov.mt/wp-content/uploads/2021/09/Disability-Doc-ENG-SEP-21.pdf>.

3 Disability and the labour market – analysis of the situation and the effectiveness of policies

In 2018, the UN CRPD Committee made the following recommendations to Malta:

[Article 27 UN CRPD](#) addresses Work and Employment.

‘40. The Committee recommends that the State party adopt further enforcement mechanisms and incentives to ensure the implementation of the quota system under articles 15 and 16 of the Persons with Disability (Employment) Act and other measures to support persons with disabilities to work in the open labour market, in accordance with the Convention and target 8.5 of the Sustainable Development Goals, and ensure the achievement of full and productive employment and decent work for all. It also recommends that the State party: (a) Amend article 17 (3) of its Constitution to bring it in conformity with article 27 of the Convention; (b) Review the quota system under the Persons with Disability (Employment) Act in order to make it applicable to enterprises with less than 20 employees; (c) Replace any assessment of suitability to work with an assessment that considers the needs and requirements for reasonable accommodation at work for persons with disabilities; (d) Step up efforts to raise awareness among employers on the rights of persons with disabilities to work in the open labour market, in particular the provision of reasonable accommodation, and on the benefits of employing persons with disabilities.’

The most recent CRPD development is the 2018 Concluding Observations and Malta’s submission in 2018.

3.1 Summary of the labour market situation of persons with disabilities

According to the Social Scoreboard indicator, cited in the Semester package, the disability employment gap in Malta is considered ‘To watch’.

Data from EU-SILC indicate an employment rate for persons with disabilities in Malta of 46.1 % in 2020, compared to 79.1 % for other persons. This results in an estimated disability employment gap of approximately 29 percentage points (estimated EU27 average gap 24.5, see Tables 2-4) or an employment chances ratio of 0.6. Statistics published on the Eurostat database indicate a disability employment gap of 29.4 percentage points in 2020, using a slightly different methodology, and falling slightly to 27 points in 2021 (against a pre-COVID-19 crisis figure of 28.1 points).³

The same data indicate unemployment rates of 9.7 % and 2.3 %, respectively in 2020 (see Tables 5-7) and the economic activity rate for persons with disabilities in Malta was 51.0 %, compared to 81.0 % for other persons (see Tables 8-10). These indications are broken down by gender and age in the respective tables in the Annex.

³ Eurostat, Disability employment gap by level of activity limitation and sex (source EU-SILC), 2022 https://ec.europa.eu/eurostat/databrowser/view/hlth_dlm200/default/table.

Due to the impact of the COVID-19 crisis on employment in 2020-2021, some caution is needed when interpreting trend data.

The 2022 National Reform Programme (NRP) notes that while the disability employment gap in Malta was on a downward trend – dropping from 41.1 % in 2015 to 28.2 % in 2019 – it increased to 29.4 % in 2020 with the onset of the COVID-19 pandemic.⁴ Nonetheless, Jobsplus⁵ – the national employment agency – reports that data indicates a steady annual increase in the number of persons with disabilities placed in employment: compared to 212 placements in 2017, 314 placements were concluded in 2021, which is 5 % of the total job placements concluded by Jobsplus during the same year.⁶ As of September 2021, 4 279 persons with disabilities – out of the 21 392 registered⁷ with the National Commission for the Rights of Persons with Disability (NCRPD)⁸ – were employed while 253 were registered as unemployed (as at January 2022).⁹

The National Statistics Office (NSO)¹⁰ does not have disability-disaggregated data for the Labour Force Survey.¹¹ However, the registered unemployed statistics indicate that in July 2022, the number of persons with disability who were registering for work decreased by 33 when compared to the previous year, reaching 225 persons. Males accounted for 77.3 % of total registrants with disability.¹²

3.2 Analysis of labour market policies relevant to the Semester

For reference, see the 2022 National Reform Programme, the Recovery and Resilience Plan for Malta and the Freedom to Live, Malta's 2021-2030 National Strategy on the Rights of Disabled Persons.

The National Reform Programme 2022¹³ reports that the 2 % quota system for employers who employ 20 or more persons – enforced by the Persons with Disability (Employment) Act of 1969¹⁴ – has resulted in the doubling of employment of persons

⁴ Ministry for Finance and Employment. 2022. Malta National Reform Programme. Available at: <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

⁵ See: <https://jobsplus.gov.mt>.

⁶ Jobsplus. 2022. Annual Report 2021, <https://jobsplus.gov.mt/resources/publication-statistics-mt-mt-en-gb/publications/annual-reports>.

⁷ This number does not include all persons with disabilities, of whom it is estimated that 35,000 live in Malta.

⁸ See: <https://www.cripd.org.mt>.

⁹ Ministry for Finance and Employment. 2022. Malta National Reform Programme, <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

¹⁰ See: <https://nso.gov.mt>.

¹¹ See: https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_C2/Labour_Market_Statistics/Pages/Labour-Force-Survey.aspx.

¹² National Statistics Office (NSO) – Malta. 2022. News Release. Registered Unemployment: July 2022. Available at:

https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_C2/Labour_Market_Statistics/Pages/Registered-Unemployment.aspx.

¹³ Ministry for Finance and Employment. 2022. Malta National Reform Programme, <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

¹⁴ Legislation Malta. 1969. Chapter 210 – Persons with Disability (Employment) Act. Available at: <https://legislation.mt/eli/cap/210/eng/pdf>.

with registered disabilities over a five-year period. The NRP states that amendments to the enforcement of this legislation were proposed in 2021. However, the UN CRPD Committee recommends that the 2 % quota for employment of people with disabilities is urgently revised and implemented within smaller companies, too¹⁵ especially since companies in Malta consist mostly of SMEs and microenterprises.

The Employment and Training Services Act,¹⁶ which regulates Jobsplus, further mandates that at least one person with disability is always represented on this entity's board.

The 2021-2030 National Disability Strategy¹⁷ was launched in June 2021¹⁸ and provides a roadmap for the disability sector in Malta up to 2030, the target year for achieving the UN Sustainable Development Goals (SDGs). The Disability Strategy comprises 13 objectives, with Objective 9 being wholly dedicated to work and employment. The action plan forming part of the strategy details seven actions in this regard:

- **Specific Disability Equality Training (DET) and information targeting all employers** within two years: includes revising and updated DET programmes geared at employers and staff to reflect the situation on the ground and relevant needs, including those of migrants with disabilities; and developing accessible and on-demand materials and guidelines for employers.
- **Pre-employment, Employment & Job Retention Strategy** to be drafted within five years. The strategy aims to enable persons with disabilities to access suitable employment of their choosing, focusing on training and investment in sections of the population where persons with disabilities are historically and chronically disadvantaged; and considering measures targeted at employment aspects such as employers issuing vacancies to ensure non-discrimination.
- **Work-related supports & adjustments** to be implemented within five years. This includes an analysis of the current needs of employees with disabilities and of those persons in employment actively supporting persons with disabilities. Based on this analysis, appropriate mechanisms will be put in place.
- **Promotion of social enterprise incentives** within nine years. This will include the formulation and implementation of a social enterprise scheme to benefit initiatives in relation to the disability sector, with a particular focus on initiatives staffed and managed by persons with disabilities. A policy document and legislative proposals emanating from this will also be developed.
- **Improved career guidance services** within five years. This includes the creation or improvement of such services to better serve persons with disabilities engaging in the labour market, in particular the mainstream one.

¹⁵ European Commission. 2021. European Semester 2020-2021 country fiche on disability equality: Malta, <https://op.europa.eu/en/publication-detail/-/publication/d01dba38-a70b-11eb-9585-01aa75ed71a1>.

¹⁶ Legislation Malta. 2019. Chapter 594 – Employment and Training Services Act. Available at: <https://legislation.mt/eli/cap/594/eng/pdf>.

¹⁷ Ministry for Inclusion and Social Wellbeing. 2020. Freedom to Live: Malta's 2021-2030 National Strategy on the Rights of Disabled Persons, <https://www.cripd.org.mt/publications>.

¹⁸ To date, no final document of this strategy has been published on the Ministry's website.

- **Outreach and detached youth work** within five years. This includes ensuring the utilisation of youth work as a tool for better including minorities such as persons with disabilities.
- **Media campaign and inclusive employer certification** to be implemented within two years. This includes discussions and an ongoing media campaign promoting persons with disabilities in employment and promoting awareness of services such as those of Jobsplus and the Lino Spiteri Foundation (LSF).¹⁹

The actions are to be implemented by a range of stakeholders including the National Commission for the Rights of Persons with Disability (NCRPD), Jobsplus, LSF, Disabled People's Organisations (DPOs), the Directorate for Disability Issues (DDI), Malta Business Disability Forum (MBDF),²⁰ Aġenzija Sapport,²¹ the Department for Disability Studies (DDS),²² Malta Enterprise,²³ the Ministry for the Economy²⁴ and other relevant entities.

To date, no information seems to be available on the Disability Strategy's implementation or impact. It is to be noted however, that some of the actions were being carried out even before the launch of the strategy. The National Commission for the Rights of Persons with Disability, for example, regularly conducts DET targeted at employers, including specific ones such as that targeted at Mater Dei Hospital (MDH) staff.²⁵ NCRPD initiatives also include awareness-raising on persons with disabilities and employment, such as the project *Ċavetta għall-Futur*, a video curriculum vitae of persons with intellectual disability aimed at challenging assumptions about the perceived lack of abilities of persons with intellectual disabilities, particularly when it comes to employment.²⁶

The actions relating to work and employment within the Disability Strategy are commendable in not only addressing much needed aspects, but also in being bound by specific timeframes. Such actions are commendable since, while Malta has very low unemployment rates compared to the rest of Europe, it also has one of the lowest employability rates for persons with disabilities. Research²⁷ shows that various barriers exist in Malta barring persons with disabilities from mainstream employment, including lack of accessibility, stigma, and lack of awareness. The same research commissioned by the NCRPD recommends the drafting of a national strategy highlighting and addressing different factors related to the employment conditions of individuals with disabilities, an aspect which was not specifically considered in the Disability Strategy.

¹⁹ See: <https://linospiterifoundation.org>.

²⁰ See: <https://www.crpdp.org.mt/about/malta-business-disability-forum>.

²¹ See: <https://sapport.gov.mt>.

²² See: <https://www.um.edu.mt/socialwellbeing/disabilitystudies>.

²³ See: <https://maltaenterprise.com>.

²⁴ See: <https://economy.gov.mt>.

²⁵ National Commission for the Rights of Persons with Disability, 2022. DET Training. Available at: <https://www.crpdp.org.mt/services/training>.

²⁶ National Commission for the Rights of Persons with Disability, 2022. *Ċavetta għall-Futur*. Available at: <https://www.crpdp.org.mt/c/%cc%87avetta-ghall-futur-project>.

²⁷ National Commission for the Rights of Persons with Disability, 2020. Research into the Current Situation of People with Disabilities and Employment in Malta, <https://www.crpdp.org.mt/resources/research>.

Meanwhile, some of the actions such as the Pre-employment, Employment & Job Retention Strategy have a rather long timeframe (five years) at the end of which only a draft would have been produced. Such a strategy would need to be approved and implemented as soon as possible to address the low rate of people with disabilities employed in Malta: EU-SILC data indicate an employment rate for persons with disabilities in Malta of 46.1 % in 2020, compared to 79.1 % for other persons.^{28 29}

²⁸ Eurostat, Disability employment gap by level of activity limitation and sex (source EU-SILC), 2022, https://ec.europa.eu/eurostat/databrowser/view/hlth_dlm200/default/table.

²⁹ European Commission. 2021. European Semester 2020-2021 country fiche on disability equality: Malta. Available at: <https://op.europa.eu/en/publication-detail/-/publication/d01dba38-a70b-11eb-9585-01aa75ed71a1>.

4 Disability, social policies and healthcare – analysis of the situation and the effectiveness of policies

In 2018, the UN CRPD Committee made the following recommendations to Malta:

[Article 28 UN CRPD](#) addresses Adequate standard of living and social protection.

There were no specific observations on this Article.

[Article 19 UN CRPD](#) addresses Living independently in the community.

'30. The Committee recommends that the State party take into account its general comment No. 5 (2017) and: (a) Ensure that existing residential institutions that contribute to the isolation of persons with disabilities are closed and that the provision of appropriate community-based services is strengthened; (b) Ensure that all projects supported by public funds are carried out in a community setting, do not contribute to isolation of persons with disabilities, are monitored by organizations of persons with disabilities and are provided with sustainable continuous funding; (c) Adopt the legal and other measures, such as the planned bill on personal autonomy and the bill on the Convention, necessary to make article 19 of the Convention justiciable; (d) Ensure that financial and other measures are in place to allow persons with disabilities to be provided with personal assistance and that personnel supporting persons with disabilities in the community are appropriately trained, if necessary.'

[Article 25 UN CRPD](#) addresses Health.

'38. The Committee urges the State party to withdraw its interpretative declaration on article 25 (a) of the Convention in order to allow persons with disabilities to enjoy the right to health on an equal basis with others.'

The most recent CRPD development is the 2018 Concluding Observations and the state's submission in 2018.

4.1 Summary of the social situation of persons with disabilities

Data from EU-SILC indicate the poverty risk rate for working age persons with disabilities in Malta was 23.5 % in 2020, compared to 12.6 % for other persons of similar age – an estimated disability poverty gap of approximately 11 percentage points (see Table 14). For people aged over 65, the disability poverty gap was 3.4 points (28.6 % for older persons with disabilities and 25.2 % for other persons of similar age). The tables in the Annex also indicate the respective rates of risk of poverty or social exclusion and break these down by gender as well age. Recently updated data from Eurostat indicates that this relative risk remained stable for the working age disabled population (23.6 %) but rose for the older age group (30.6 %) in 2021.³⁰

³⁰ Eurostat, People at risk of poverty by level of activity limitation, sex and age, https://ec.europa.eu/eurostat/databrowser/view/hlth_dpe020/default/table?lang=en.

For persons with disabilities of working age (18-64) in Malta, the risk of poverty before social transfers was 41.8 % and 23.5 % after transfers. The in-work poverty rate for persons with disabilities in this age range was 7.6 % in 2020, but rose significantly to 11.1 % in 2021.

Of interest to health policy are the data on self-reported unmet needs for medical examination (too expensive, too far to travel or waiting list). Disability equality gaps are evident here too and, on this basis, the rate for persons with disabilities in Malta was 0.1 %, compared to near zero for other persons, although the disability figure rose to 0.5 % in 2021.

In 2020 there was an increase in national gross social expenditure with regard to hospitals and healthcare facilities (EUR 685 317 000 up from EUR 604 502 000 in 2019); the care of the elderly and persons with disabilities (EUR 152 601 000, up from EUR 139 533 000 in 2019); as well as in social security non-contributory benefits (EUR 199 001 000, up from EUR 187 066 in 2019).³¹ In 2022, increases were also made to the carer grant received by parents who provide care to their severely disabled children over 16 years of age (increased by EUR 300) and to the carer allowance received by those taking care of a relative with low dependency on a full-time basis (increased to EUR 7 000 yearly). The New Hope Guarantee Scheme was also introduced whereby the Government acts as a guarantor for life insurance to enabled disabled people to become homeowners.³²

Nonetheless, a recent study on service provision for persons with disability³³ in Malta found that there is currently both a lack of community service provision as well as a lack of continuity in the services provided. The study, finalised in 2021, reports that NGOs expressed their concern at the lack of adequacy in meeting the needs of persons with disabilities and their families, as well as at the lack of apparent effort in moving away from the institutionalisation of persons with disability and adopting community-based services to improve independent living. As the NCRPD notes in its *Shadow Report* submitted to the UN Committee on the Rights of Persons with Disabilities in 2018,³⁴ persons with disability should have access to leisure time at all times. This, however, is not possible unless there are personal assistants who can accompany them during the activities. Thus, as the previously mentioned study commissioned by the NCRPD in 2021³⁵ recommends, a greater effort needs to be made in order to move away from institutionalised care and invest more in services such as personal assistance schemes, which allow persons with disabilities to live independently and participate fully and actively in society, as advocated by Article 19 of the UN CRPD.

³¹ National Statistics Office (NSO). 2022. Social Protection 2022 – Reference Years 2016-2020: <https://nso.gov.mt/en/nso/Media/Salient-Points-of-Publications/Pages/2020/Social-Protection-2020.aspx>.

³² Ministry for Finance and Employment. 2022. Malta National Reform Programme, <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

³³ Faculty for Social Wellbeing, I-Universita' ta' Malta (commissioned by the NCRPD). 2021. Service Provision and Persons with Disability, <https://www.crpdp.org.mt/resources/research>.

³⁴ National Commission for the Rights of Persons with Disability. 2018. Submission to the Committee on the Rights of Persons with Disabilities in Advance of its Consideration of Malta's 1st Periodic Report. Available at: <https://www.crpdp.org.mt/uncrpd-det/uncrpd>.

³⁵ Faculty for Social Wellbeing, L-Universita' ta' Malta (commissioned by the NCRPD). 2021. Service Provision and Persons with Disability, <https://www.crpdp.org.mt/resources/research>.

4.2 Analysis of social policies relevant to the Semester

For reference, see the 2022 National Reform Programme, the Recovery and Resilience Plan for Malta and the Freedom to Live, Malta's 2021-2030 National Strategy on the Rights of Disabled Persons.

Independent Living

The NRP 2022³⁶ makes no mention of independent living.

Objective 10 of the 2021-2030 National Disability Strategy³⁷ is dedicated to living independently in the community, and deinstitutionalisation. It lays out six relevant actions in this regard:

- **Addressing gaps in mainstream services in the community** within five years. This includes initiating discussions concerning accessibility of mainstream services in the community and identifying opportunities for the further spread of community services. These discussions will result in an initial report issued for public consultation, after which an action plan will be drawn up.
- **Strengthening personal assistance and community living schemes** within five years. This includes consultations to take stock of the situation regarding personal assistance and community living schemes, identify gaps and formulating recommendations. A strategic plan on independent living and personal assistance will be drawn up.
- **Setting up of a train-the-practitioner unit** within nine years. This includes specialised training delivered to professionals working with persons with disabilities.
- **Support services and curtailing abuse** within two years. This includes finalising a Protection of Adults in Situations of Vulnerability Bill.
- **Better co-ordination among service providers** within two years. This includes initiating dialogue to coordinate best practices and discuss key concerns regarding service provision. This will result in a list of service providers and professionals who are able / qualified to provide professional services.
- **Deinstitutionalisation** within nine years. A deinstitutionalisation strategy for Malta will be drawn up within this time frame.

The actions are to be implemented by a range of stakeholders including the NCRPD, the DDI, the DDS, DPOs, civil society organisations (CSOs), Aġenzija Support, authorities, local councils, service providers and other relevant stakeholders.

Once again, the proposed actions are commendable, especially in view of the situation of independent living in Malta (see Section 4.1). The previously mentioned

³⁶ Ministry for Finance and Employment. 2022. Malta National Reform Programme, <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

³⁷ Ministry for Inclusion and Social Wellbeing. 2020. Freedom to Live: Malta's 2021-2030 National Strategy on the Rights of Disabled Persons, <https://www.crpd.org.mt/publications>.

NCRPD study,³⁸ for example, mentions the fragmentation of disability services as one of the causes for lack of continuity of such services (see Section 4.1). Thus, the proposed coordination among services is very welcome and timely. To date, however, very little research has been carried out, on, for example, personal assistant schemes and services and their effectiveness in Malta, of any impact / progress any of these proposed actions are having.

Furthermore, some of the actions are rather lacking in strength. For example, having discussions on accessibility, resulting, in five years' time, only in a report and action plan, is a rather unfeasible process when taking into consideration the multitude of research³⁹ that has already been carried out on the accessibility (and the lack of) of services for persons with disabilities in the community – research which also includes various recommendations that could be acted upon within the timeframe, rather than producing further reports. Similar observations can also be made regarding, for example, discussions on service provision and the major lacunae within, which is the focus of the NCRPD study issued in 2021 and mentioned earlier.

Health

One of the focal points of the NRP 2022⁴⁰ is strengthening the resilience and sustainability of the healthcare system. One of the measures to be taken in this regard is enhancing the accessibility of healthcare systems. However, very little reference is made to persons with disabilities in this regard, with a few exceptions such as introducing a Congenital Deafness Screening Programme.

Objective 8 of the Disability Strategy⁴¹ focuses on healthcare and proposes five actions in this regard:

- **Revising the Code of Ethics for practising medical professionals** in order to move away from traditional disability discourses (to be achieved within nine years).
- **Providing specialised training to medical professionals and staff** on breaking news to persons with disabilities and their families in a disability-sensitive manner (to be achieved within two years).
- **Increasing disability sensitisation in Medical Boards** in order for such professionals to have a better knowledge of disability and the needs of persons with disability (to be achieved within five years).

³⁸ Faculty for Social Wellbeing, *L-Universita' ta Malta* (commissioned by the NCRPD). 2021. Service Provision and Persons with Disability. Available at: <https://www.crpdp.org.mt/resources/research>.

³⁹ See, for example: Faculty for Social Wellbeing, *L-Universita' ta Malta* (commissioned by the CRPD). 2021. Service Provision and Persons with Disability. Available at: <https://www.crpdp.org.mt/resources/research>; Bezzina, L. 2018 (commissioned by the NCRPD). Systematic Review: Masters' and LL.D. Dissertations on Disability in Malta. Available at: <https://www.crpdp.org.mt/resources/research>; Bezzina L. and Suarez, H. 2018 (commissioned by Inspire Foundation). Obstacles and Challenges encountered by Persons with Disabilities in Malta. Available at: <https://know-ur-rights.com/research-study-obstacles-and-challenges-encountered-by-persons-with-disabilities-in-malta>.

⁴⁰ Ministry for Finance and Employment. 2022. Malta National Reform Programme, <https://finance.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>.

⁴¹ Ministry for Inclusion and Social Wellbeing. 2020. Freedom to Live: Malta's 2021-2030 National Strategy on the Rights of Disabled Persons. Available at: <https://www.crpdp.org.mt/publications>.

- **Health promotion for persons with disabilities**, including discussions in order to ensure that health promotion efforts are inclusive of, and accessible to persons with disabilities (to be achieved within five years).
- **Producing regular reporting on access to services by persons with disabilities** on matters related to health, including on actions taken and gaps identified (to be achieved within nine years).

The actions are to be implemented by a range of stakeholders including the NCRPD, the DDI, the DDS, DPOs, Aġenzija Sapport, the Ministry for Health⁴² and other relevant stakeholders.

As with the other Disability Strategy objectives discussed in Section 3.2 and earlier in this section, the actions, while commendable, could benefit from strengthening in terms of the outputs, outcomes and steps to be taken for each action (with a breakdown of a timeframe for each step, especially those which are to be achieved within five or nine years), such as that regarding health promotion. Discussions on their own are not enough: concrete measures need to be taken as soon as possible with regard to health promotion, including that surrounding sexuality and sexual relationships. This area is one where people with disabilities encounter barriers including with regard to sexual education and accessibility to health and services.⁴³

⁴² See: <https://deputyprimeminister.gov.mt>.

⁴³ Faculty for Social Wellbeing, *L-Universita' ta Malta* (commissioned by the NCRPD). 2022. Intersectionality and Persons with Disability. Available at: <https://www.crpdp.org.mt/resources/research>.

5 Disability, education and skills – analysis of the situation and the effectiveness of policies

In 2018, the UN CRPD Committee made the following recommendations to Malta:

[Article 24 UN CRPD](#) addresses Education.

‘36. Recalling its general comment No. 4 (2016) on the right to inclusive education and Goal 4 of the Sustainable Development Goals, especially targets 4.5 and 4.A, the Committee recommends that the State party: (a) Ensure the implementation of its laws on education, and accelerate the adoption process of the bill on the Convention, to ensure that violations of the rights under article 24 of the Convention become justiciable in the State party; (b) Adopt measures to ensure that students with disabilities, including students with intellectual or psychosocial disabilities, are provided with reasonable accommodation at all levels of education, and allocate the resources necessary to guarantee reasonable accommodation according to individual requirements in consultation with the person concerned, including the provision of learning support educators and their replacements when they are absent; (c) Ensure accessible mechanisms for accountability and redress in cases in which educational institutions, such as childcare centres and summer schools, or teachers discriminate against students on the basis of their disability; (d) Review the curriculum of students with disabilities through individualized education plans to ensure that the curricula allow them to learn the skills required to access the job market on an equal basis with others; (e) Carry out research on the extent to which accessibility standards are being complied with in the State party to obtain a full understanding of the barriers persons with disabilities face in the education system and the solutions required to enable their full participation, and to make research findings on the socioeconomic and cultural benefits of inclusive education available to all relevant stakeholders.’

The most recent CRPD development is the 2018 Concluding Observations and the state’s submission in 2018. In a related development, in 2019 the Committee on the Rights of the Child issued its Concluding Observations to the Malta State Party Report submitted in 2017.⁴⁴ The observations regarding children with disabilities are relevant for education, either directly or indirectly. This includes the need to collect data on children with disabilities, ensuring that early childhood care and education staff are trained to work with children with disabilities and raising awareness to counter the stigmatisation of children with disabilities. More pertinently to education, the Concluding Observations include the need to:

‘31 (d) Strengthen the implementation of the Policy on Inclusive Education in Schools, with specific measures to ensure that students with disabilities, including students with intellectual or psychosocial disabilities, are provided with reasonable accommodation; and train specialized teachers and

⁴⁴ Committee on the Rights of the Child. 2019, Concluding Observations on the combined third to sixth periodic reports on Malta. Retrieved from:

<https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsg7%2b4%2fqMVk67og8W3WL3NgfTU%2fnqgHmXO4VldQOdNY5c3Pzf%2f2kL%2for9buMreMtLkTY0jcdvxzAXai8qhoQwJIGHA7s55TPcAcPp2m8Q0ML>.

professionals to provide individual support and all due attention to children with learning difficulties.’

Additionally, the Concluding Observations call for increased ‘availability and accessibility of child and adolescent mental health services and programmes’ (32). Improvement in this area could have a positive effect on the education of students with disabilities at all levels of education.

The Concluding Observations regarding education are worth quoting verbatim:

Education, including vocational training and guidance

38. While recognizing the State party’s efforts to reduce the incidence of dropping out of school after the completion of compulsory education at 16 years of age, to address bullying behaviour in schools, and to integrate asylum-seeking and refugee children into mainstream education, the Committee notes with concern that children in vulnerable and marginalized situations, such as asylum-seeking, refugee and migrant children and children with disabilities, continue to face barriers in their access to quality education, including owing to delays in the registration of the asylum applications or to the lack of reasonable accommodation for children with disabilities in mainstream schools. It is also concerned about the phenomenon of bullying and cyberbullying, in the school environment and beyond.

39. Taking note of targets 4.5 and 4.A of the Sustainable Development Goals, the Committee recommends that the State party:

Take measures necessary for improving the accessibility to and the quality of education, including for children in vulnerable and marginalized situations, such as asylum-seeking, refugee and migrant children and children with disabilities, and implement a human rights-based approach to the entire educational system that is more inclusive and supports all children’s aspirations.

(b) Further strengthen and allocate adequate human, technical and financial resources for the implementation, monitoring and evaluation of the Framework for the Education Strategy (2014-2024).

(c) Continue its efforts to implement the Alternative Learning Programme, and further promote quality vocational training to enhance the skills of children and young people, especially those who drop out of school.

(d) Strengthen measures to combat bullying and raise awareness of its harmful effects, with particular emphasis on combating cyberbullying, including through ensuring the effective implementation of the Safe Schools Programme and allocating adequate human, technical and financial resources to the Child Safety Service and the Anti-Bullying Unit.

(e) Revise the curricula and the educational methodology to place further emphasis on the value of education, critical thinking, accepting differences, embracing diversity and building social cohesion.

Human rights education

40. The Committee recommends that the State party develop and implement a national plan of action for human rights education, as recommended in the framework of the World Programme for Human Rights Education.

5.1 Summary of the educational situation of persons with disabilities

The EU-SILC 2020 estimates concerning educational attainment should be treated with caution due to relatively wide confidence intervals but they consistently indicate disability equality gaps (an average of 2-3 years provides a more stable indication). Table 16 indicates early school leaving rates disaggregated by disability status in Malta. Youths with disabilities (aged 18-24) are significantly more likely to leave school than non-disabled peers of the same age groups (and this is reinforced by widening the sample size to age 18-29). Table 17 shows completion rate of tertiary education disaggregated by disability and age group. Persons with disabilities (aged 30-34) are less likely to complete tertiary education than their peers (and this is reinforced in the wider age range 30-39).

Statistics obtained from the ACCESS Disability Support Unit at the University of Malta and from the Malta College of the Arts, Science and Technology (MCAST) show that both the number and the overall percentage of students with disabilities continued to increase over the past two academic years (see Annex 7.3.1).

5.2 Analysis of education policies relevant to the Semester

The 2022 National Reform Programme identifies inclusive education as a key priority for the Maltese Government. The programme refers to the issuing of guidelines for primary schools to become dyslexia friendly and providing support for school leavers with disabilities ‘to bridge the gap between school and the workplace and close collaboration between schools and post-secondary institutions ensures that they are supported in their transition to post-secondary education’ (p. 43). In its Annexes, the NRP also refers to the setting up of two autism units in state middle schools in 2021 and plans to create multi-sensory learning rooms. In this regard, the project referred to in the NRP to provide ‘for the further integration of pupils with special needs into the mainstream school environment contributing towards an inclusive and quality education system’ (p. 37) is crucial. This project can help ensure that disability-specific units set up in mainstream schools are truly used for the original aim of promoting inclusion rather than being repurposed as spaces for placing students with individual educational needs that create challenges for the education system as it is currently configured, thus effectively excluding them from it. It is therefore essential to ensure that these measures do not have the unintended consequence of undermining, rather than enhancing, inclusive education.

Additionally, component 5 of the Recovery and Resilience Plan for Malta focuses on education and socioeconomic sustainability.⁴⁵ One of the reforms envisaged is

⁴⁵ Malta’s Recovery and Resilience Plan. Retrieved from: <https://eufunds.gov.mt/en/Operational%20Programmes/Documents/Malta%27s%20Recovery%20%20Resilience%20Plan%20-%20July%202021.pdf>.

‘Developing new education pathways towards inclusive and quality education’. There is also a pledged investment for setting up a Centre for Vocational Education Excellence. It is important that this new centre factors in inclusivity, including providing access for students with disabilities, in all aspects of its design and operation.

The rights of students with disabilities have been further strengthened through the incorporation of the UN CRPD into Maltese law through the UN CRPD Act (Cap. 627).⁴⁶ This means that Article 24 (Education) of the UN CRPD is now part of Maltese law. Another significant legislative change is the new Education Act (Cap. 605)⁴⁷ which is replacing the older Education Act (Cap. 327).⁴⁸ Most of the articles in the latter act have now been repealed.⁴⁹ One of the changes that could have the most significant impact on the education of students with disabilities in compulsory education is that parents no longer have the last say in the choice of school for their children. Cap. 605, Article 8 states that:

Decisions with regard to matters concerning the education of a minor shall be based primarily on the best educational interests of the minor with due regard to the interests of other students attending the same school as the minor and the continued effective and efficient operation of the school.

Where there is disagreement on these matters, it is the Board for Educational Matters (provided for in Article 64 of Cap. 605) that decides. The chair of the board is a legal professional. The other four members ‘shall include a parent representative, an educator, a professional from the psychosocial field and an expert in the specific field of inclusive education’ (Article 64.2), with the members being chosen after consultation with the National Commission for the Rights of Persons with Disabilities to ensure that it is in line with the UN CPRD. The board is to ensure that reasonable steps to keep a student referred to it in their present school have been taken and there is also scope for review should circumstances change.

The specification of the two members from the psychosocial and inclusive education fields, together with the requirement to ensure that the composition of the board is in line with the UN CRPD indicate that the board may be expected to deal mostly with the placement of students with disabilities, especially those who, in terms of Article 8 quoted above, can be seen as undermining the interests of their classmates and the operation of the school. The impact that this legal provision could have on students with disabilities who are considered to challenge the education system needs to be carefully monitored.

The Freedom to Live, Malta’s 2021-2030 National Strategy on the Rights of Disabled Persons,⁵⁰ was launched in 2021 following a consultation period. Objective 7 (pp. 92-

⁴⁶ United Nations Convention on the Rights of Persons with Disabilities Act (Cap. 627). Retrieved from: <https://legislation.mt/eli/cap/627/20210817/eng>.

⁴⁷ Education Act (Cap. 605). Retrieved from: <https://legislation.mt/eli/cap/605/20220301/eng>.

⁴⁸ Education Act (Cap. 327). Retrieved from: <https://legislation.mt/eli/cap/327/20220308/eng>.

⁴⁹ Legal Notice 373 of 2021. Notice of Repeal of Chapter 327 of the Laws of Malta. Retrieved from: <https://legislation.mt/eli/ln/2021/373/eng>.

⁵⁰ Freedom to Live: Malta’s 2021-2030 National Strategy on the Rights of Disabled People. Retrieved from: <https://inclusion.gov.mt/wp-content/uploads/2021/09/Disability-Doc-ENG-SEP-21.pdf>.

101) is dedicated to 'Informal, Formal and Non-formal Education'. There are eight actions identified with specified target dates for completion and the stakeholders involved for the completion of each action. These actions, which are correlated with both the UN CRPD and the SDGs, cover the following areas:

1. Ensuring that all students with disabilities, including those in further and higher education, have individualised education plans (IEPs). The action also specifies discussing the legal status of the IEP and involving students in their own educational planning.
2. Transition planning from one educational stage to the next.
3. Regular accessibility studies of educational establishments in relation to physical and sensorial accessibility as well as curricular and assessment accessibility.
4. Support for persons with disabilities to take up courses in the use of digital technology, including the European computer driving licence (ECDL) and the use of augmentive and alternative communication (AAC) devices.
5. Collaboration with the Malta Further and Higher Education Authority to find ways of making further, higher and continuing education more accessible.
6. Ensuring that all learning support educators are suitably qualified.
7. Collaboration with other Government entities, especially the national youth agency Aġenzija Żgħażaġħ, the Access to Communication Technology Unit, the Foundation for Information Technology Accessibility and the Ministry of Education.
8. The setting up of a working group on inclusive education which would include representatives of the Ministry of Disability Rights, the Ministry of Education, civil society and trade unions.

The Directorate for Disability Issues is identified as the entity responsible for the implementation of these actions, while the National Commission for the Rights of Persons with Disabilities (NCRPD) is tasked with carrying out research to monitor the implementation. This implementation is still in its initial stages and it is therefore still too early to evaluate it.

Now that the Freedom to Live Strategy is being implemented with a timeframe that runs up to 2030, the education-related components of the National Reform Programme and the Recovery and Resilience Plan should ensure that measures taken are in line with the actions identified in Objective 7 of the strategy.

The developments discussed above are quite strong on measures which cater directly for the particular needs of certain students with disabilities. As pointed out earlier, it is important to ensure that these measures do not inadvertently undermine inclusion, or even create segregation, by moving students with disabilities out of mainstream educational provision. The necessity for this provision to adapt to the needs of students with disabilities should remain a priority. Consequently, any policies and measures related to education and training need to be designed and implemented in ways that ensure that they incorporate the provision of reasonable accommodation for impairment-related needs. Taking disability issues into account is also essential for measures taken to address shortcomings in the education sector. These shortcomings include the skills mismatch across different employment sectors and the persistent issue of early school leaving, both of which are mentioned on p. 3

of the European Commission's 2022 Country Report for Malta. Furthermore, collecting data on the inclusion of students with disabilities at all levels of education is essential. These data need to go beyond accounting for the number of students with disabilities placed in mainstream educational institutions and provide an in-depth picture of the quality of inclusive education and its outcomes.

6 Investment priorities in relation to disability

The most recent budget speech, for the year 2022, provides a clear indication of the Maltese Government's commitment to address the needs of persons with disabilities.⁵¹ Allowances for people with disabilities, especially those who cannot work because of the severity of their impairments, as well as allowances for parents of children with disabilities, those caring for severely disabled adult family members have been steadily increasing, and have also been increased again for this year. In addition, the severe disability allowance will no longer be means tested. Further benefits identified in the 2022 budget speech are widening the eligibility criteria for exemptions and deductions enjoyed by people with disabilities who purchase a vehicle, and an occupational therapy service aimed at reducing waiting lists for children with disabilities. This investment could contribute to an improvement in the quality of life of persons with disabilities and their families by creating more disposable income for them.

In the area of education, the budget speech refers to the autism units, mentioned in the National Reform Programme (NRP) as well as the purchase of Braille machines (which is related to the multisensory learning project also mentioned in the NRP) and exploring ways of enhancing sign language awareness in schools. Another education-related investment is the provision of support for children with disabilities to continue with their studies once they finish their compulsory education. These investments can improve the quality of the education that students with disabilities receive, as long as they remain actively included in mainstream classrooms.

With regards to services, the budget speech refers to the introduction of a 'Community Hub' to provide 'specialised training on various aspects related to independent living' (paragraph 2.29). It is not clear if this proposed investment is similar or related to the REACH project that was announced a few years ago and has not yet been implemented. If it is related, the caution expressed about the REACH project apply, that is to ensure that the services provided at the Community Hub enhance community inclusion rather than ending up providing a segregated service. Further services that were announced are an increase in the provision of psychological services for persons with disabilities and their families, to avoid delays and the purchase of a 'drive from wheelchair' vehicle which can be used for driving lessons. These measures should help to ensure that people with disabilities are afforded greater opportunities for independence and community integration.

Furthermore, the budget speech refers to the continuation of the INK project, administered by Aġenzija Sapport and partly funded by the European Social Fund. Through this project, jobseekers with disabilities are provided with opportunities for training and employment.

Investment in the area of disability was also mentioned in the budget speech in relation to housing. Continuation and enhancement of schemes and projects managed by the Housing Authority take persons with disabilities into account. This is an excellent example of how policies and measures factor disability-related needs

⁵¹ Budget Speech 2022. Retrieved from:
https://finance.gov.mt/budget2022speech/Documents/Budget_Speech_2022.pdf.

into the equation, rather than bracketing them as being within the purview of disability services per se.

This type of mainstreaming of disability issues needs to be more evident in all areas of public and social policy. Areas where this practice should be more in evidence include the green transition and the digital transition, which are found in Malta's Recovery and Resilience Plan. Needless to say, the 102 new electric buses need to be physically accessible. However, accessibility goes beyond that and takes in the whole transport infrastructure, from a person with reduced mobility being able to get to the bus stop from their point of departure and to reach their intended destination after their arrival, to having accessible information about bus routes and on board the buses themselves. Shortcomings in these areas are identified by Bajada, Mifsud and Di Ciommo (2016) in research about access to transport by older persons.⁵² The issues that the researchers highlight in these aspects of public transport are also applicable to persons with reduced mobility who have not yet reached old age. With regards to the planned ferry landing site at Buġibba, it is also imperative that this is accessible. With regard to the electrification of ferry transport and any other developments regarding ferry services, it is worth pointing out that any new ferries need to be accessible and be easy for passengers with reduced mobility to board, alight and circulate within them. The use of an inaccessible ferry, as with the Gozo Channel vessel *Nikolaus* – which then had to be rectified to the extent that was possible – should not be repeated.⁵³

With reference to the green transition, the Intercept project, in which Malta is taking part, provides a good example of merging environmental with social issues as it targets young people aged 25-29 and who are not in education, employment or training to receive training and work experience in the green sector. The importance of young people with disabilities in this project cannot be overstated.

Finally, the projected investments related to the digital transition need to take accessibility into account from the start. The two main aspects in this regard are, first of all, to ensure that any digital equipment and services provided have built-in accessibility according to the web accessibility initiative guidelines,⁵⁴ and that persons with disabilities are provided with any assistance they may need to be able to access and use digital devices.

⁵² Bajada, T., Mifsud, D. and Ciommo, F.D. (2016). Accessibility as an indicator of transport equity: the case of public transport infrastructure in Malta, and its impact on the elderly. Xjenza Online. DOI: 10.7423/XJENZA.2016.1.10, <https://cambiamo.net/wp-content/uploads/2019/08/Bajada-Mifsud-Di-Ciommo-2016-Accessibility-as-an-indicator-of-transport-equity.-The-case-of-public-transport-infrastructure-in-Mal.pdf>.

⁵³ Giordamaina, J. (Newsbook, 18 June 2019) 'New' ferry equipped with stairlift not lift – CRPD. Retrieved from: <https://newsbook.com.mt/en/new-ferry-equipped-with-stairlift-not-lift-crpd/> and Times of Malta (7 November 2019) Gozo Channel's *Nikolaus* to be made more accessible. Retrieved from: <https://timesofmalta.com/articles/view/gozo-channels-nikolaus-to-be-made-more-accessible.747993>.

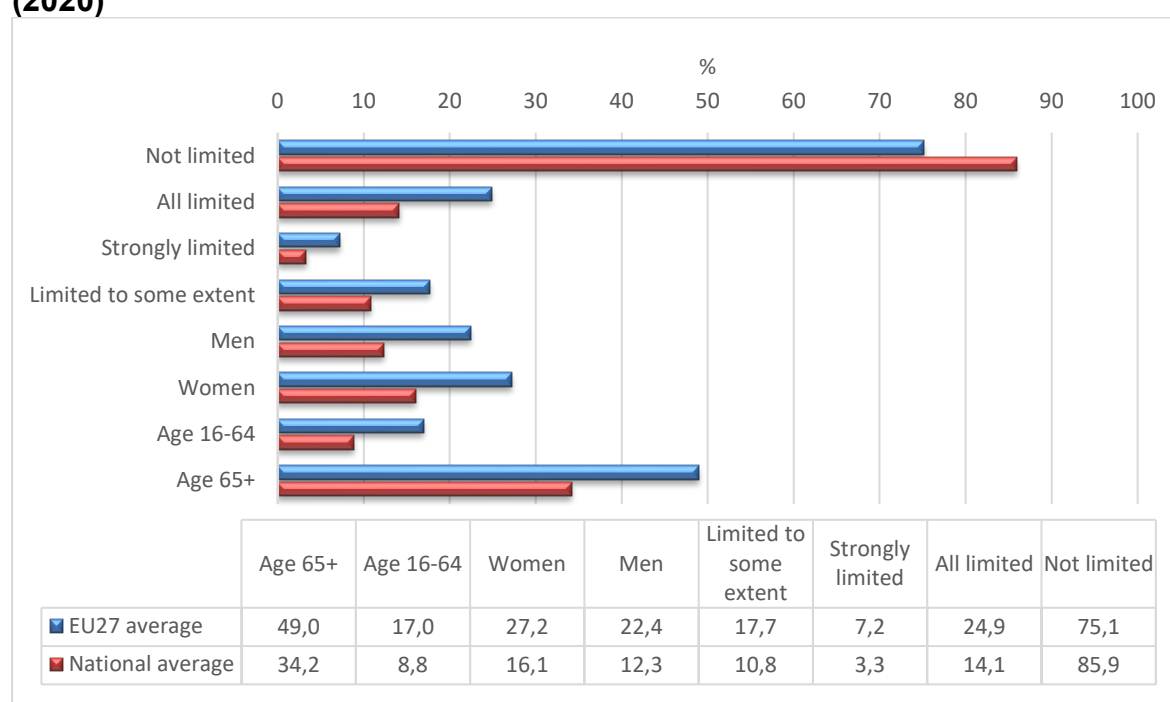
⁵⁴ Web Accessibility Initiative. WCAG2 Overview. Retrieved from: <https://www.w3.org/WAI/standards-guidelines/wcag/>.

7 Annex: disability data relevant to the Semester

See also disability data published in the Eurostat database⁵⁵ and statistical reports.⁵⁶

Unless specified, the summary statistics are drawn from the most recent EU-SILC data available to researchers from Eurostat. The EU-SILC sample includes people living in private households and does not include people living in institutions (congregative households). The sampling methods vary somewhat in each country. The proxy used to identify people with disabilities (impairments) is whether ‘for at least the past 6 months’ the respondent reports that they have been ‘limited because of a health problem in activities people usually do’.⁵⁷

Table 1: Self-reported ‘activity limitations’ as a proxy for impairment / disability (2020)



Source: EU-SILC 2020 Release April 2022

In subsequent tables, these data are used to indicate ‘disability’ equality gaps and trends relevant to the analytical chapters – for the labour market, social policies and healthcare, and education – by comparing outcomes for persons who report and do not report ‘activity limitations’.⁵⁸ National estimates for Malta are compared with EU27 mean averages for the most recent year.⁵⁹

⁵⁵ Eurostat Health Database: <https://ec.europa.eu/eurostat/web/health/data/database>.

⁵⁶ Eurostat (2019) Disability Statistics: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Disability_statistics.

⁵⁷ The EU-SILC survey questions are contained in the Minimum European Health Module (MEHM), [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Special:WhatLinksHere/Glossary:Minimum_European_Health_Module_\(MEHM\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Special:WhatLinksHere/Glossary:Minimum_European_Health_Module_(MEHM)).

⁵⁸ This methodology was developed in the annual statistical reports of ANED, available at: <http://www.disability-europe.net/theme/statistical-indicators>.

⁵⁹ The exit of the United Kingdom from the EU changed the EU average. EU27 averages have been affected also by time series breaks in other large countries, such as Germany.

7.1 Data relevant to disability and the labour market

Table 2: EU and Malta employment rates, by disability and gender (aged 20-64) (2020)

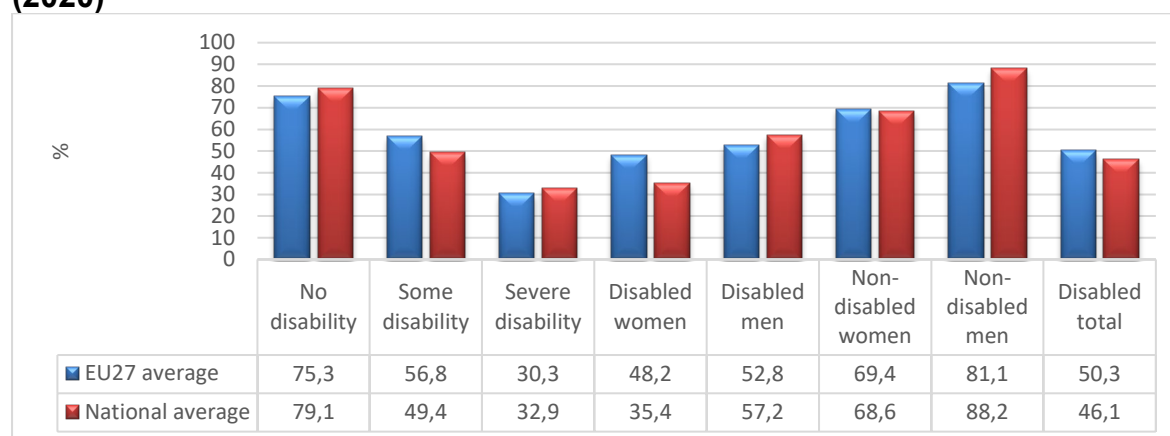


Table 3: Employment rates in Malta, by disability and age group (2020)

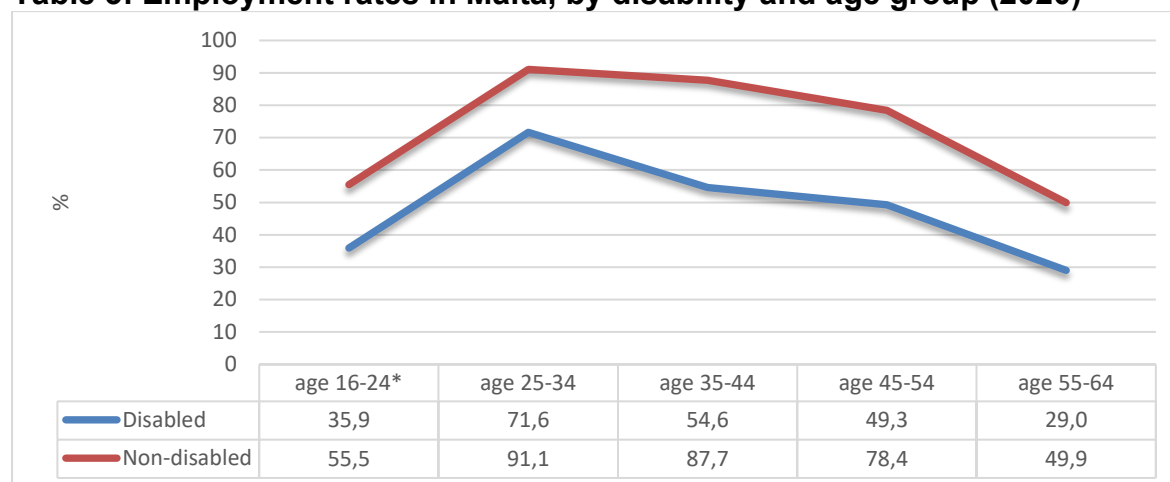


Table 4: National trends in employment rates, by disability status (aged 20-64)



Source: EU-SILC 2020 Release April 2022 (and preceding UDBs)

Note: Microdata concerning employment status was not available for Germany and Italy in this data release, which affects the EU27 average (which is therefore estimated).

7.1.1 Unemployment

Table 5: Unemployment rates by disability and gender (aged 20-64) (2020)

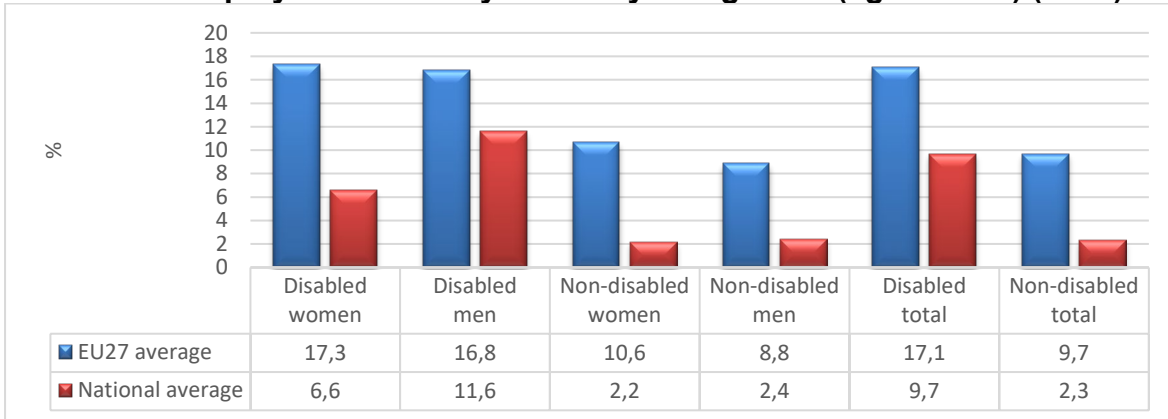


Table 6: Unemployment rates in Malta, by disability and age group (2020)

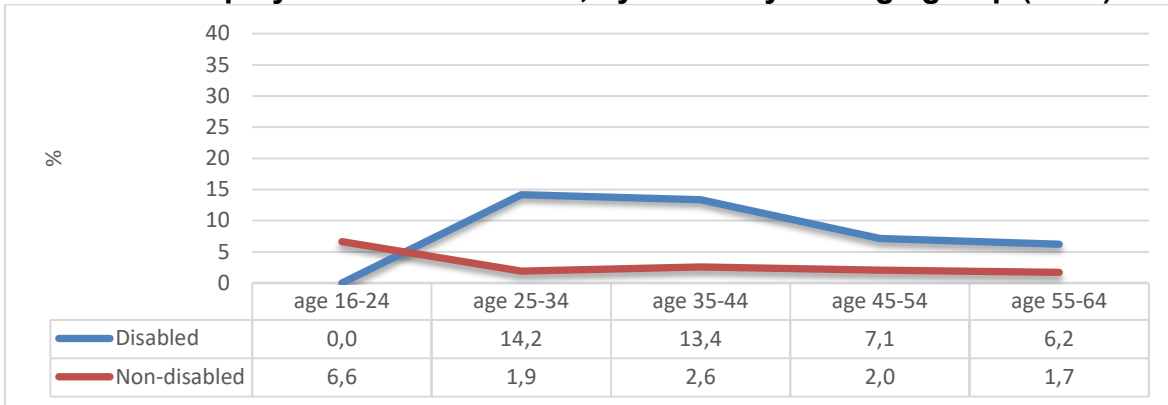
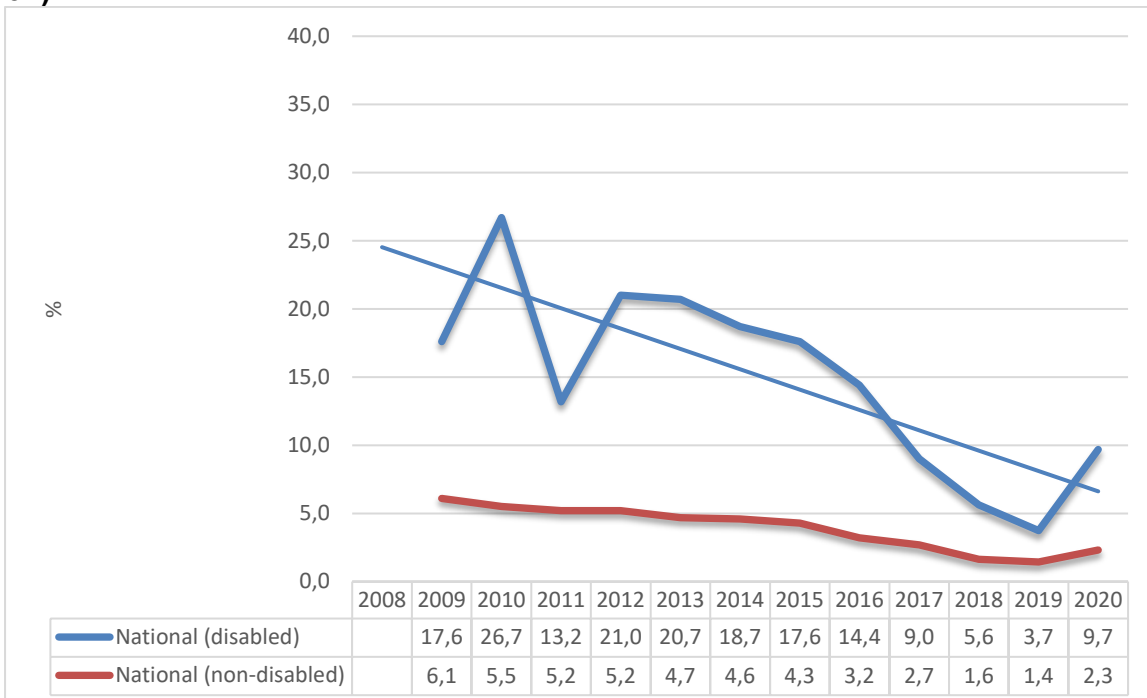


Table 7: National trends in unemployment rate, by disability status (aged 20-64)



Source: EU-SILC 2020 Release April 2022 (and preceding UDBs)

7.1.2 Economic activity

Table 8: Activity rates in Malta, by disability and gender (aged 20-64) (2020)

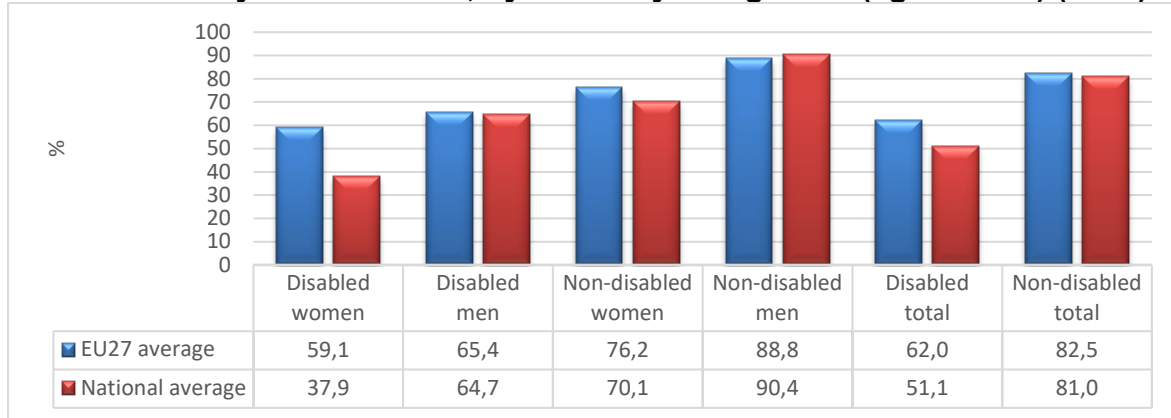


Table 9: Activity rates in Malta, by age group (2020)

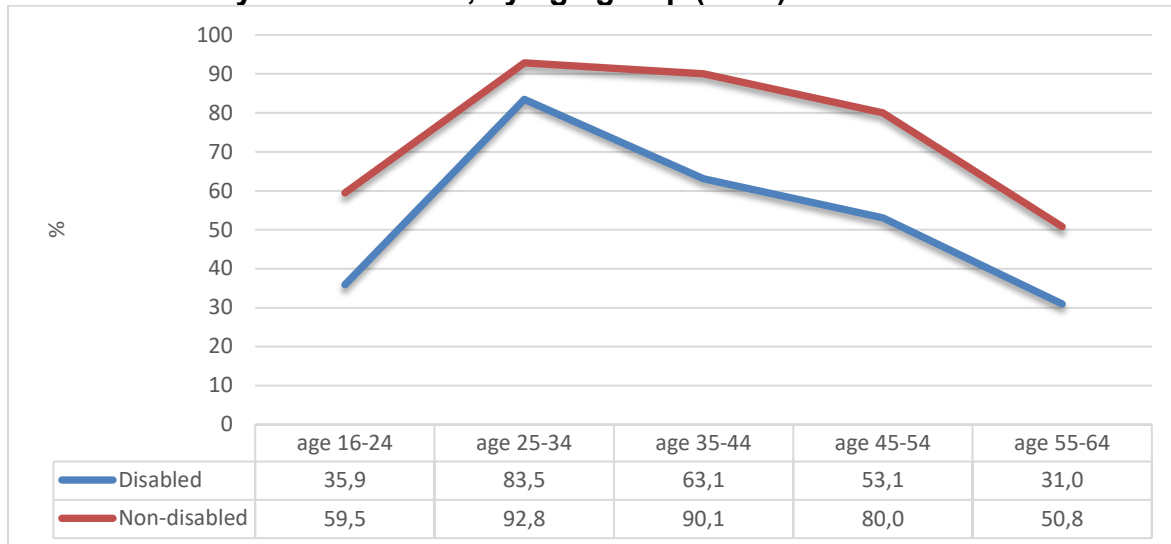
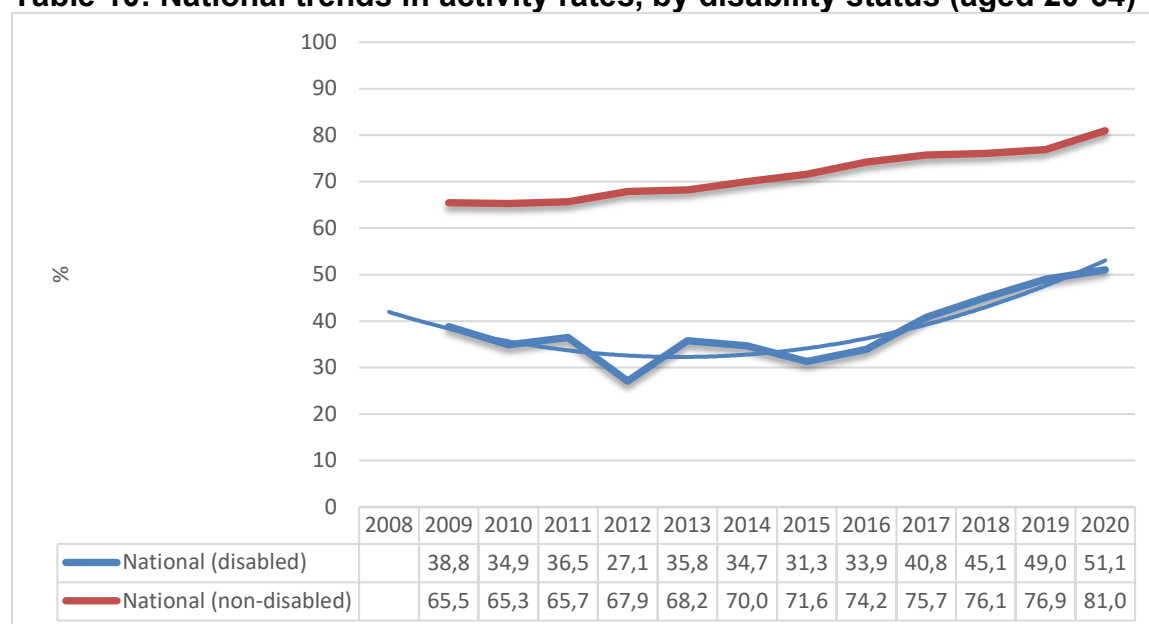


Table 10: National trends in activity rates, by disability status (aged 20-64)

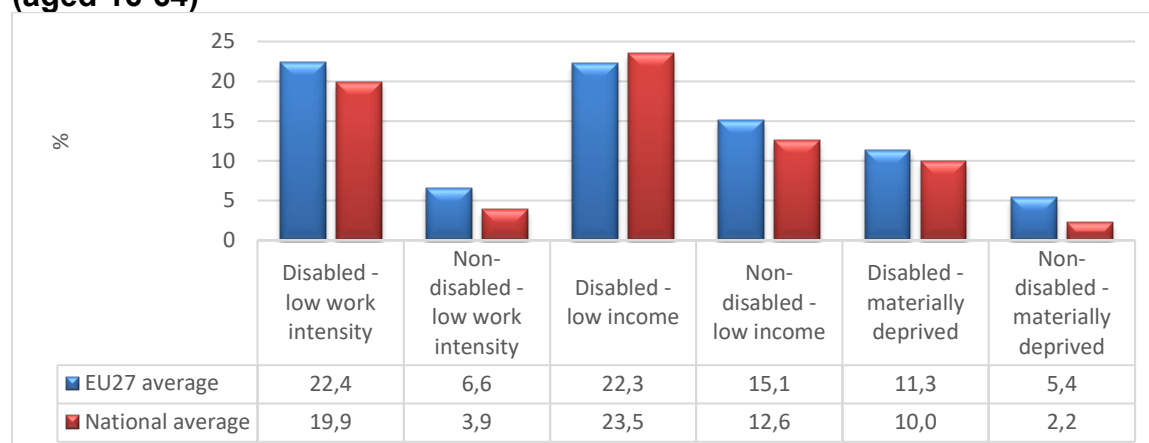
Source: EU-SILC 2020 Release April 2022 (and preceding UDBs)

7.1.3 Alternative sources of labour market data in Malta

Disability data is not yet available from the core European Labour Force Survey but labour market indicators for Malta were disaggregated from ad hoc modules conducted in 2001 and 2011. These can be found in the Eurostat disability database.⁶⁰

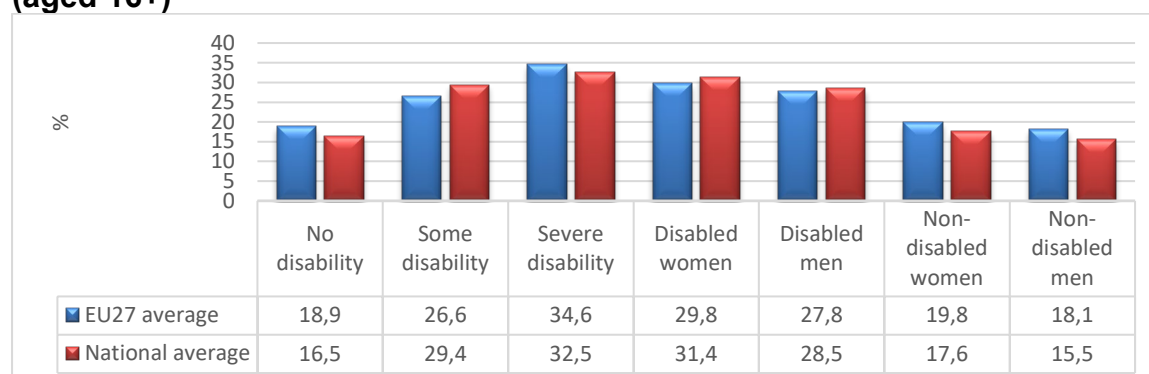
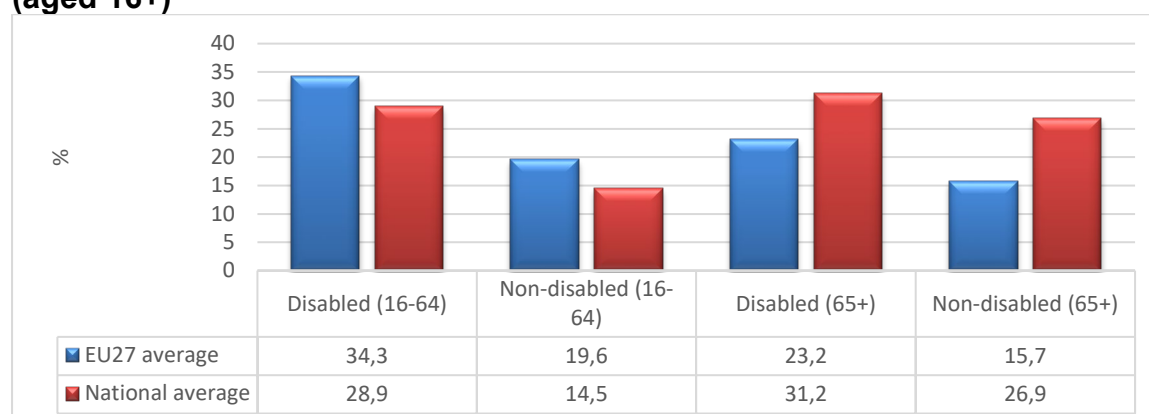
Alternative sources of national data are referred to in the text of Section 3.

7.2 EU data relevant to disability, social policies and healthcare (2020)

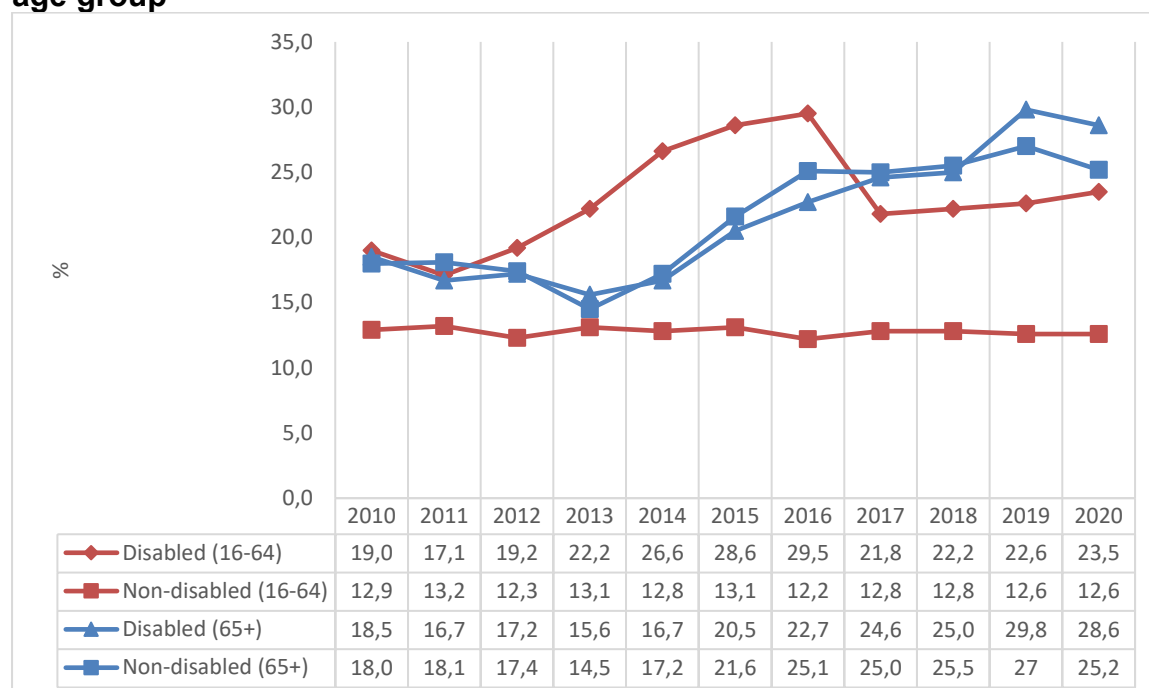
Table 11: People at risk of poverty or social exclusion, by disability and risk (aged 16-64)⁶¹

⁶⁰ Eurostat Health Database: <https://ec.europa.eu/eurostat/web/health/data/database>.

⁶¹ Aged 16-59 for Low work intensity.

Table 12: People at risk of poverty or social exclusion, by disability and gender (aged 16+)

Table 13: Overall risk of household poverty or exclusion by disability and age (aged 16+)


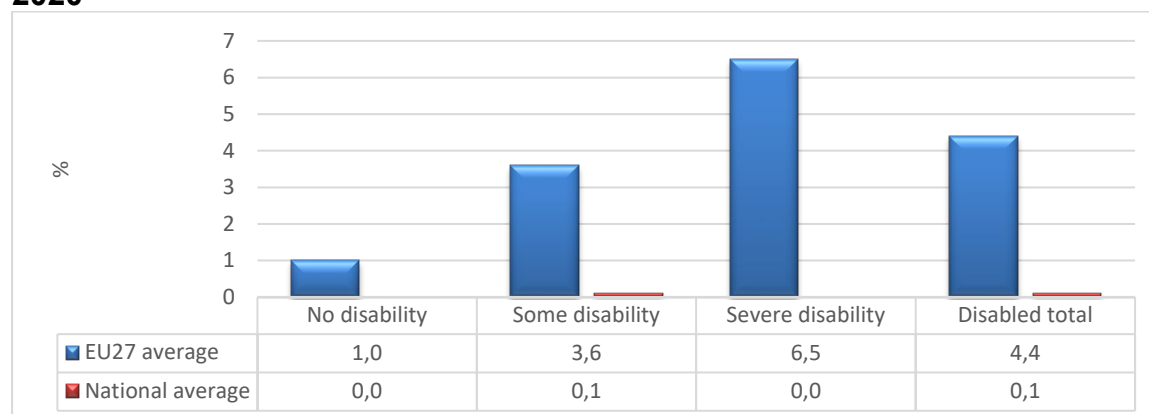
Source: EU-SILC 2020 Release April 2022 (and previous UDB)

Table 14: Trends in the risk of poverty after social transfers, by disability and age group


Source: Eurostat Health Database [[hlth_dpe020](#)] – People at risk of poverty

Note: This table shows national trends in financial poverty risk, rather than the general AROPE indicator (which is not as comparable between age groups due to the effect of paid employment); the survey does not distinguish 'activity limitation' for children under 16.

Table 15: Self-reported unmet needs for medical examination (% , aged 16+) 2020



Source: Eurostat Health Database [hlth_dh030] – 'Too expensive or too far to travel or waiting list'

Note: EU mean averages are also skewed by high values in a minority of countries within disability groups but median averages for the total disability and no disability groups in 2020 are somewhat lower than the 3-year mean values, but declined year on year.

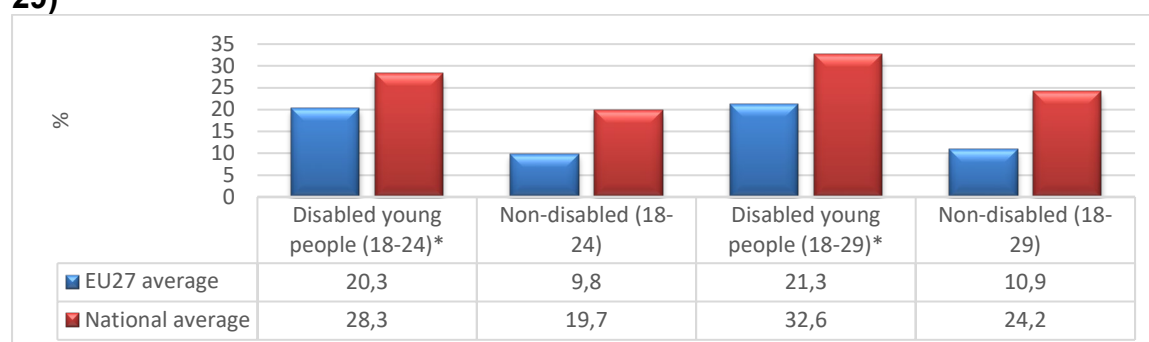
7.2.1 Alternative sources of poverty or healthcare data in Malta

The EU-SILC data provide a comprehensive and reliable source concerning poverty or social exclusion rates. In addition to the summary tables presented so far, the Eurostat disability database also contains breakdowns concerning disability and poverty before and after social transfers, as well as in-work-poverty.⁶²

Alternative sources of national data are referred to in the text of Section 4.

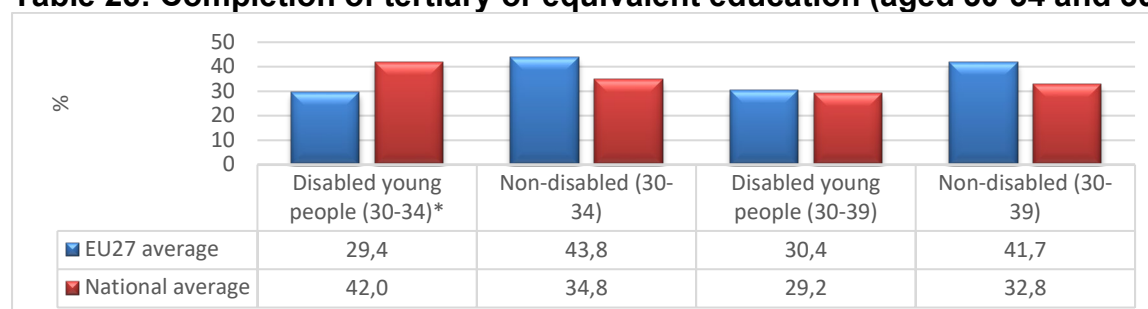
7.3 EU data relevant to disability and education

Table 24: Early school leaving rates, by disability status (aged 18-24 and 18-29)⁶³



⁶² Eurostat Health Database: <https://ec.europa.eu/eurostat/web/health/data/database>.

⁶³ There was a change from ISCED 1997 to ISCED 2011 qualification definitions in 2014 although some Member States continued to use the older definition after this time.

Table 25: Completion of tertiary or equivalent education (aged 30-34 and 30-39)

Source: EU-SILC 2020 Release April 2022 (and preceding UDBs)

Note: Confidence intervals for the disability group are large and reliability low (due to the small sample size in the target age group). An average of several years may be needed to establish trends or to compare breakdowns by gender. There were fewer than 50 observations in three of the four disability groups, which should be treated with caution.

7.3.1 Alternative sources of education data in Malta

Table A: Students with disabilities at the University of Malta

Year	Number of students with disabilities	Total number of students	% Students with disabilities
2018-2018	310	11,500	2.69
2018-2019	183	11,670	1.57
2019-2020	201	11,117	1.81
2020-2021	247	11,598	2.1
2021-2022	297	11,269	2.6

Table B: Number of students with disabilities who graduated from the University of Malta

Year	Number of students with disabilities
2018-2019	47
2019-2020	47
2020-2021	79
2021-2022	48*

* This figure does not include students who are awaiting their resit results and can be updated in November 2022.

MCAST

Year	Number of students with disabilities	Total number of students with disabilities (full-time)	% Students with disabilities
2018-2019	837	6757	12%
2019-2020	710	6115	12%
2020-2021	712	6226	11%
2021-2022	764	6342	12%

The figures of the total number of students are those submitted to the NSO in March of the respective academic year while those of the number of students with disabilities are those worked out at the end of the academic year by the IEU. This provides more realistic statistics since MCAST students are re-enrolled in February for Semester 2 (therefore such data would be complete for NSO purposes) while a number of students keep on approaching the IEU for registration even till May and June.

Note: 'Students with disabilities' in the column includes all students with Special Educational Needs (SEN).

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