

# THE EXPERIENCE OF AZERBAIJANI DISABILITY COMMUNITY LIVING IN GEORGIA

Access to Social Protection Mechanisms



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The Experience of Azerbaijani Disability Community Living in  
Georgia  
Access to Social Protection Mechanisms

Social Justice Center

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## Introduction

For years, the social protection system of Georgia has been highly flawed and has failed to cover various groups, strengthen them, eradicate poverty and help avoid it. Due to the state inaction, systemic challenges faced by socio-economically vulnerable population persists and require urgent actions.

Failures of the social protection system are felt the hardest by people with one or multiple vulnerabilities. They live in full or partial neglect by the state. They are compelled to face challenges daily related to the geographic, financial and physical accessibility of services, the quality of services, insufficiency of services, as well as neglect of the needs of particular groups in service planning and provision.

Socio-economic vulnerability of people with disabilities and their inaccessibility to respective services is a grave problem in Georgia and globally.<sup>1</sup> Countries around the globe resort to social protection measures to identify the needs of this group and to establish/develop respective support services whose aim is to remove inequalities between people with disabilities and the rest of the population.<sup>2</sup>

Even without additional vulnerabilities, ethnic minorities are outsiders in the social hierarchy that maintains them as society's most socially excluded and neglected group.<sup>3</sup> Discriminatory legislation, policies and practice are often barriers to access to essential services for them; they are also deprived of the opportunities to exercise many rights and freedoms and are particularly susceptible to poverty.<sup>4</sup> Nonetheless, it is substantial that the ethnic minority rights provision discourse goes beyond eliminating discrimination and involves effective political and institutional mechanisms, including those positive measures for protecting people with double or multiple vulnerabilities, as well as consultation and participation mechanisms for ethnic minorities.<sup>5</sup>

Gaps in the social policy hit harder the people with disabilities of dual or multiple vulnerabilities; among them are people with disabilities from ethnic minorities.<sup>6</sup> The problem of service

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<sup>1</sup> Report of the independent expert on the question of human rights and extreme poverty, A/63/274, 2008, Para. 40.

<sup>2</sup> See the example, Report of the Special Rapporteur on the rights of persons with disabilities, A/70/297, 2015.

<sup>3</sup> Report of the independent expert on the question of human rights and extreme poverty, Arjun Sengupta, E/CN.4/2005/49, 2005, Para. 14; Report of the independent expert on the question of human rights and extreme poverty, Arjun Sengupta, A/HRC/7/15, 2008, Para. 28.

<sup>4</sup> Report of the independent expert on the question of human rights and extreme poverty, A/63/274, 2008, Para. 20, 31; OHCHR, Guiding Principles on Extreme Poverty and Human Rights, 2012, pg. 3.

<sup>5</sup> Report of the Independent Expert on Minority Issues, A/67/293, 2012, Para. 14.

<sup>6</sup> Report of the independent expert on minority issues, Gay McDougall, A/HRC/13/23, 2010, Para. 56.

inaccessibility strikes more vividly on the central government level, which, unlike the municipalities, has fewer ties with the population and lower awareness of their needs.

The aim of the proposed research is to expose the main challenges that ethnic minority PwDs face on the central government level regarding their access to social protection and independent living mechanisms and to prepare respective recommendations. To have evaluated state policies in this area and effectively identified existing gaps, the scope of the research was narrowed down to the Azerbaijani population living in Kvemo Kartli. Nonetheless, existing problems, considering how systemic and complex they are, are relevant for other ethnic minority groups as well.

Social Justice Center wishes that the challenges identified in this research give different stakeholders working on protecting the rights of the PwD community and ethnic minorities one additional advocacy direction. Additionally, considering the scale and the substance of the identified problems, Social Justice Center calls the government institutions to take respective measures to eradicate them in the shortest time.

## Methodology

The research examined the access of the Azerbaijani disability community to the following central-level mechanisms:

- Procedures for assignment of disability status;
- State program on social rehabilitation and child care and services;
- Employment promotion state program and services.

The following methods were put to use:

- Desk research analysed international standards, the Georgian context (both 'hard' and 'soft' legislative norms), local legislation, policy documents, service definitions, and secondary sources. The desk research also analysed public information that was provided to the Social Justice Center by the Ministry of IDPs from the occupied territories, labour, health and social affairs of Georgia (MoIDPLHSA);
- Individual interviews with the authorities working on the issues, specifically with the representatives of the MoIDPLHSA and the Public Defender;
- Focus group discussions with the social workers working in the Kvemo Kartli region who have experience working with ethnic minority PwDs. The research involved social workers employed at the central government level, at the LEPL Agency For State Care And Assistance For the (Statutory) Victims of Human Trafficking. A total of 6 social workers were interviewed.
- Focus group discussions with people with disabilities in ethnic minorities and with their family members. The research spoke to 16 people living in Marneuli, Bolnisi

and Dmanisi municipalities.

Only service accessibility matter will be assessed, but the individual interviews and focus groups conducted with the PwD community, as well as numerous other types of research conducted by the Social Justice Center, explicitly show those additional barriers that are there at the central or municipal level services and resolution of which is very important for improving the wellbeing of thousands of people and for ensuring their independent living.

## 1. Access of people with disabilities in ethnic minorities to services – general standards

People with disabilities from minorities, considering their dual and multiple vulnerabilities, are the group made most invisible and discriminated against globally. Stigma, exclusion, and lack of access to services is the non-exhaustive list of challenges this group faces daily. The inability to exercise one's rights particularly negatively impacts one's social and economic conditions. Numerous international agreements note that the risks that PwDs from ethnic minorities and their families live in poverty, as well as experience general socio-economic vulnerability, are high<sup>7</sup>, due to which provision of fair and inclusive social policies is critical to respond to the social protection failures and to adjust programs to individual needs<sup>8</sup>.

There are numerous relevant international standards concerning the service accessibility of PwDs that explains in detail the importance of access to services (linguistic, geographic, financial and physical accessibility) and state responsibilities in this regard. Additionally, international standards singlehandedly require consideration of human rights-based approaches when formulating and implementing any PwD policies. Next to other principles, such an approach includes double or multiple vulnerability considerations and reflection of the diverse needs of different groups in the legislation, policies and practice.<sup>9</sup>

### 1.1. Review of international standards

Unhindered access to people with disabilities from ethnic minorities to services is covered by many international agreements, which determine the substance and nature of state

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<sup>7</sup> Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Kenya, CRPD/C/KEN/CO/1, 2015, Para 49; Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Slovakia, CRPD/C/SVK/CO/1, 2016.

<sup>8</sup> Report of the independent expert on the question of human rights and extreme poverty, Magdalena Sepúlveda Carmona, Mission to Viet Nam, A/HRC/17/34/Add.1, 2011, Para 101.

<sup>9</sup> ob. Report of the Special Rapporteur on the rights of persons with disabilities, A/HRC/34/58, 2016.

responsibilities in this regard. Among them is the UN Convention on the Rights of Persons with Disabilities (CRPD), the International Covenant on Social, Economic and Cultural Rights, as well as the Council of Europe Framework Convention for the Protection of National Minorities. There is not one standard enshrined in the UN Sustainable Development Goals on PwDs and ethnic minorities too, as well as in the 2030 agenda, that speaks about the necessity of empowering and fostering social, economic and political inclusion of all people, despite of their belongingness to different groups, despite disabilities, belongingness to ethnic minorities, to different religions or financial status.<sup>10</sup>

The UN CRPD establishes the most significant standards. It does not include separate clauses for ethnic minority PwDs; still, its preamble notes the alarming difficulties and discrimination that the PwD community faces due to belonging to different groups, including ethnic minorities. Additionally, various international agreements and mechanisms distinguish multilayered discrimination and intersectional oppression that ethnic minority representative PwDs face and call for the state to take respective legislative and political measures to eradicate this problem and ensure that this group is equally exercising all rights and freedoms with others.<sup>11</sup> It is important to note that when discussing intersectional discrimination, international standards particularly distinguish ethnic minority women and children with disabilities as most neglected by the state and the most vulnerable group requiring actual actions.<sup>12</sup>

- Ensuring service accessibility

States take different measures for equal participation of PwDs in public life, including of PwDs with minority backgrounds, and for their unhindered exercise of rights and freedoms. For PwDs particularly important at the following measures:

- Equal access to the physical environment, transport, information and communication, as well as to public institutions and services, both in rural and urban areas;
- Providing access to independent living services and assisting items;
- Guaranteeing access to employment, social protection and poverty eradication services,

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<sup>10</sup> 2030 Agenda for Sustainable Development, Target 10.2, <https://bit.ly/3DVS2kD>.

<sup>11</sup> For example see Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Poland, CRPD/C/POL/CO/1, 2018, Para. 8; Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Turkey, CRPD/C/TUR/CO/1, 2019, Para 12.

<sup>12</sup> Committee on the Rights of Persons with Disabilities, General comment No. 3 (2016) on women and girls with disabilities, CRPD/C/GC/3, 2016, ¶¶. 4; Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of the Philippines, CRPD/C/PHL/CO/1, 2018, Para. 17.

as well as rehabilitation and habilitation services.<sup>13</sup>

State responsibilities for access to the above-mentioned services and programs are the same for any person with a disability. More specifically, support services must be sufficient, accessible, financially accessible, and acceptable and adaptable for every PwD<sup>14</sup>. They must consider their different living conditions, including ethnic and linguistic belongingness.<sup>15</sup> Additionally, according to the accessibility concept, the state must ensure physical accessibility of the environment and geographic, financial and information accessibility of the service.<sup>16</sup>

Additionally, it must be mentioned that any policy measure, including the one related to the establishment of services, must correspond to the individual needs of the representatives of this group, the assessment of which, on its hand, should be based on the social model of UN CRPD. After its enforcement, UN CRPD fully changed the paradigm around PwDs and said that the policies should consider not only medical diagnosis but also those barriers that PwDs face that hinders their active participation in public life. Therefore, any procedure that entails the determination of the status of a person with a disability must fully comply with human rights standards and be accessible for all, despite the person's needs and place of living.<sup>17</sup>

- Linguistic barriers and respective state responsibilities

Informational inaccessibility of services is the most distinguished barrier of ethnic minority PwDs, putting them in radically bad positions compared to the rest of society.<sup>18</sup> Linguistic barriers and respective state responsibilities, gaps in the national education system, poverty and socio-economic vulnerability, and place of living – as a whole or individually represent the reasons for the most significant problems of information inaccessibility. These barriers are often accompanied by stigmatising communication with state authorities.<sup>19</sup> The informational vacuum is felt more strongly by the ethnic minorities that live in rural areas, away from urban

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<sup>13</sup> UNCRPD, 2006, ¶. 9, 19, 26-28; Committee on Economic, Social and Cultural Rights, General Comment No. 18: The Right to Work, E/C.12/GC/186, 2006, ¶. 17, 23; OHCHR, Human Rights indicators for the Convention on the Rights of Persons with Disabilities in support of a disability inclusive 2030 Agenda for Sustainable Development, Article 9: Illustrative indicators on accessibility, <https://bit.ly/3eJZoi2>; 2030 Agenda for Sustainable Development, Targets 8.5, 10.2, <https://bit.ly/3DVS2kD>.

<sup>14</sup> Report of the Special Rapporteur on the rights of persons with disabilities, A/HRC/34/58, 2016, ¶. 48 – 56.

<sup>15</sup> Committee on the Rights of Persons with Disabilities, General comment No. 5 (2017) on living independently and being included in the community, CRPD/C/GC/5, 2017, ¶. 60; Report of the Special Rapporteur on the rights of persons with disabilities, A/HRC/34/58, 2016, ¶. 16.

<sup>16</sup> Committee on the Rights of Persons with Disabilities, General comment No. 2 (2014), Article 9: Accessibility, CRPD/C/GC/2, 2014; OHCHR, Human Rights indicators for the Convention on the Rights of Persons with Disabilities in support of a disability inclusive 2030 Agenda for Sustainable Development, Article 19: List of illustrative indicators on living independently and being included in the community, <https://bit.ly/3eJZoi2>.

<sup>17</sup> OHCHR, Human Rights indicators for the Convention on the Rights of Persons with Disabilities in support of a disability inclusive 2030 Agenda for Sustainable Development, Articles 1 to 4: List of illustrative indicators on the purpose, definitions, principles and general obligations of the Convention on the Rights of Persons with Disabilities (CRPD), <https://bit.ly/3eJZoi2>.

<sup>18</sup> Committee on Economic, Social and Cultural Rights, General Comment No. 19: The right to social security (art. 9), E/C.12/GC/19, 2008, ¶. 35; Report of the Independent Expert on minority issues, Rita Izsák, A/HRC/22/49, 2012, ¶. 67.

<sup>19</sup> Report of the Independent Expert on Minority Issues, A/67/293, 2012, ¶. 48.



centres. This is why they face higher risks of being excluded from services that they have rights to.<sup>20</sup> In the end, the passive role of the state organs in overcoming linguistic barriers entirely excludes ethnic minorities and PwDs among them. It exempts them from the possibility of exercising their rights without barriers.

The UN stresses linguistic barriers and state responsibilities, specifically, the PwD Rights Committee and the independent UN expert on minority issues. In particular, there is a high emphasis on providing information accessible by PwDs and on the necessity of ensuring communication accessibility; also, about providing and teaching ethnic minority PwDs their rights and ways of exercising them, there is a requirement to make UN CRPD accessible in minority languages<sup>21</sup>. Notably, the state's refusal to ensure information and communication accessibility is understood to be a form of discrimination.<sup>22</sup>

In addition to that, the Council of Europe Framework Convention for the Protection of National Minorities and its Advisory Committee establish essential standards too. Next to other significant matters, Convention mentions state responsibilities to recognise the rights of everyone belonging to ethnic minorities to use their language privately and publically, both in oral and written communication.<sup>23</sup>

On the other hand, according to the Convention, in those places where ethnic minorities live in big numbers traditionally, states must respond to their needs and requests and undertake all the necessary measures to ensure the use of minority languages in the communication between these groups and administrative organs.<sup>24</sup> The Advisory Committee further elaborates on this important standard. It emphasises the importance of ethnic minority languages and says that the language is not just a form of expression and communication, but it is also important for the realisation of quite many rights, including rights related to participation in economic, social and cultural life, as well as education, etc.<sup>25</sup>

Additionally, the Committee points to those challenges that ethnic minority representatives face, including access to employment, healthcare, social protection, and education caused by

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<sup>20</sup> Report of the Independent Expert on minority issues, Rita Izsák, A/HRC/22/49, 2012, Para. 67, 71.

<sup>21</sup> Committee on the Rights of Persons with Disabilities, General comment No. 2 (2014), Article 9: Accessibility, CRPD/C/GC/2, 2014, Para. 21, 23; Committee on the Rights of Persons with Disabilities, General comment No. 7 (2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention, CRPD/C/GC/7, 2018, ¶¶. 45; Report of the Independent Expert on Minority Issues, A/67/293, 2012, Para. 48, 72, 76.

<sup>22</sup> Committee on the Rights of Persons with Disabilities, General comment No. 2 (2014), Article 9: Accessibility, CRPD/C/GC/2, 2014, ¶¶. 29.

<sup>23</sup> Council of Europe 1995 Framework Convention on the Protection of National Minorities. Article 10 (1).

<sup>24</sup> Ibid.

<sup>25</sup> Advisory Committee on the Framework Convention for the Protection of National Minorities, Thematic Commentary No. 3: The Language Rights of Persons Belonging to National Minorities under the Framework Convention, ACFC/44DOC(2012)001 rev, 2012, Para 3.

the linguistic barrier.<sup>26</sup> To solve this problem, it tells the Government to take the following measures:

- Provide unrestricted access to public services and information and consultations on social protection services, including on minority languages;
- Ensure access to social welfare and healthcare services for ethnic minorities in their native language and recognition of the need to fight intersectional discrimination, including on the grounds of disability;
- Collect relevant and detailed information for elaborating such political measures that promote different groups' language needs and respect their rights.<sup>27</sup>
- The importance of statistical data

One of the factors that international standards singlehandedly distinguish as necessary is the collection of relevant statistical data and the provision of public access to it. Data collected through research allows us to effectively monitor the accomplishments of international and national level obligations by the state and to distinguish needs in particular spheres or of particular groups.<sup>28</sup>

Different UN bodies also point to the importance of collecting data and analysing it (including the Committee on the Rights of PwDs, Committee on the Rights of Child, and Special Rapporteur on the Rights of PwDs) and in connection to the 17th and 17.18 Sustainable Development Goals of the UN<sup>29,30</sup>.

The Committee on the Rights of PwDs, not once, called the states to develop a unified system and procedures for collecting data on PwDs and to sort this information according to age, sex, ethnicity, education and employment status, etc.<sup>31</sup> What is more UN Special Rapporteur on the Rights of PwD stresses that any data related to PwDs must at least be analysed according to sex,

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<sup>26</sup> Ibid. Para. 86.

<sup>27</sup> Advisory Committee on the Framework Convention for the Protection of National Minorities, Thematic Commentary No. 3: The Language Rights of Persons Belonging to National Minorities under the Framework Convention, ACFC/44DOC(2012)001 rev, 2012, Para 3, 19, 88; Advisory Committee on the Framework Convention for the Protection of National Minorities (ACFC), Fifth Opinion on Finland, ACFC/OP/V(2019)001, 2019, ¶¶. 22, 142.

<sup>28</sup> UNCRPD, 2006, Article 31

<sup>29</sup> GOAL 17 - PARTNERSHIPS TO ACHIEVE THE GOAL, Sustainable Development Goals. See the link: <https://bit.ly/3RIInZ4>.

<sup>30</sup> For example see Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Greece, CRPD/C/GRC/CO/1, 2019, Para. 47.

<sup>31</sup> Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of Jamaica, CRPD/C/JAM/CO/1, 2022, Para. 57; Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of France, CRPD/C/FRA/CO/1, 2021, Para. 63.

age and ethnic belongingness.<sup>32</sup> The UN Special Rapporteur on National Minorities also emphasises the importance of underpinning the policy interventions with precise statistical data.<sup>33</sup> According to its guidance, targeted assistance and policies for ethnic minorities that the state develops should be underpinned by accurate information.

Disaggregated statistical information must be available in all policy-making spheres, for example, in social protection (regarding beneficiary access), access to employment and access to including by underaged population, etc.<sup>34</sup>

The Advisory Committee of the Framework Convention on the Protection of National Minorities has interesting guidance on collecting statistical data. According to it, when collecting any data, freedom of self-determination by ethnic minorities should be considered – they shouldn't be obliged to always self-identify as the ones belonging to a minority group.<sup>35</sup> Questions related to belongingness and self-identification should stay open and allow for the selection of multiple identities, which can be later analysed accordingly and become accessible.<sup>36</sup>

Besides, in those cases when the realisation of particular rights concerns specific quantitative indicators<sup>37</sup>, the right to free self-identification means the right of minorities to: 1. be adequately informed about the data collection methods and goals in their native language by the state, 2. be adequately involved in organising such processes and in implementing them, particularly in those areas where a significant number of ethnic minorities live.<sup>38</sup>

The Advisory Committee particularly stresses that it is ill-advised that the state only leans on the official statistics and quantitative data about ethnic minorities because, considering different factors, these data may not fully reflect reality.<sup>39</sup> Instead of this, governments, in close coordination with minorities, should periodically review and analyse statistical information and use different sources, including independent quantitative and qualitative research.<sup>40</sup>

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<sup>32</sup> Report of the Special Rapporteur on the rights of persons with disabilities on her mission to the Republic of Moldova, A/HRC/31/62/Add.2, 2016, ¶60, 61.

<sup>33</sup> Report of the Special Rapporteur on minority issues on her mission to Sri Lanka, A/HRC/34/53/Add.3, 2017, Para. 75..

<sup>34</sup> Committee on the Rights of Persons with Disabilities, Concluding observations on the initial report of the Philippines, 2018, Para. 49; Committee on the Rights of Persons with Disabilities, General comment No. 8 (2022) on the right of persons with disabilities to work and employment (Advance Unedited Version), CRPD/C/GC/8, 2022, Para. 4.

<sup>35</sup> Advisory Committee on the Framework Convention for the Protection of National Minorities, the Framework Convention: a Key Tool to Managing Diversity through Minority Rights, Thematic Commentary No. 4 – The Scope of Application of the Framework Convention for the Protection of National Minorities, ACFC/56DOC(2016)001, 2016, Para 16.

<sup>36</sup> Ibid.

<sup>37</sup> When the existence of services is connected to certain quantitative data about ethnic minorities, that later identifies needs.

<sup>38</sup> Ibid., Para 17.

<sup>39</sup> For example, a person may refuse to give information about his/her ethnic belongingness during the survey, due to having experienced discrimination and marginalization on the grounds of ethnicity; Ibid. Para 18, 25.

<sup>40</sup> Ibid.

- Ensuring participation

Participation by ethnic minority PwDs is crucial in decision-making (both on central and municipal levels). UN CRPD stresses the importance of PwD and DPO participation in planning policy interventions and implementing and monitoring them.<sup>41</sup>

The UN Committee further elaborates on the given general clause on the Rights of PwDs. In its 7<sup>th</sup> general comment and numerous recommendations issued to a state the Committee, amongst others, stresses the importance of effectively including ethnic and/or religious minority representative PwDs and PDOs in decision-making on every level.<sup>42</sup>

## 1.2. Relevant national standards

Different legal regulations and policy documents can be discussed concerning ethnic minority PwDs. In the first place, the Constitution of Georgia reinforces equality rights and forbids discrimination on different grounds, including the grounds of ethnicity.<sup>43</sup> The right to equality, enshrined in the Constitution, entails state responsibilities to ensure special conditions for protecting the rights and interests of people with disabilities.<sup>44</sup>

The equality principle is also in the legislation of Georgia, the law on Elimination of All Forms of Discrimination, whose aim is to eliminate all forms of discrimination and to ensure that any individual or a legal entity can exercise the rights established by the local legislation equally, and this includes people belonging to different ethnicities<sup>45</sup>.

In addition to the above-mentioned, Georgia has ratified not one international agreement mentioned in the previous chapter. That includes the UN CRPD, the International Covenant on Economic, Social and Cultural Rights, Council of Europe Framework Convention on National Minorities. Additionally, in 2005, when ratifying the Council of Europe Framework Convention, Georgia took an obligation on Article 10<sup>46</sup> to ensure translation service for national minorities when they communicate with the administrative organs or litigating cases at courts

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<sup>41</sup> UN CRPD 2006, Article 4(3), 33 (3).

<sup>42</sup> Committee on the Rights of Persons with Disabilities, General comment No. 7 (2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention, CRPD/C/GC/7, 2018, Para. 50, 94; See also, Report of the Special Rapporteur on the rights of persons with disabilities, A/HRC/31/62, 2016, Para. 100.

<sup>43</sup> Constitution of Georgia, 1995, Article 11 (1).

<sup>44</sup> Ibid

<sup>45</sup> Law of Georgia on Elimination of All Forms of Discrimination, 2014, Article 1.

<sup>46</sup> Framework Convention on National Minorities, Article 10 (2), 1995.

<https://matsne.gov.ge/ka/document/view/1244853?publication=0>

so that minorities can realise rights granted to them about the use of minority languages.<sup>47</sup>

- Thematic legal standards

The law of Georgia on The National Languages has interesting regulations about ethnic minority language rights.<sup>48</sup> According to the legislation in those municipalities where ethnic minorities live compactly:

- The state has an obligation to provide translation when ethnic minority representatives communicate with state and municipal authorities;
- State and municipal authorities are mandated to translate documents, complaints or responses presented by ethnic minority representatives in national minority languages if the needs arise.
- If the need arises, municipal organs will ensure the translation of the normative acts they create into the national minority languages;
- There is a chance that public announcements, banners, posters and other visual information, next to being presented in a state language, be translated into the national minority languages;
- An official event of local significance (except for the municipal hearing) can be conducted in the national minority language.

The law of Georgia on the Rights of People with Disabilities is another essential document for our research. It was adopted by the Parliament of Georgia in 2020, and it aims to guarantee independent living and non-discrimination for PwDs, as well as their full-fledged participation in all spheres of life.<sup>49</sup> The law concerns various PwD rights, including equality, independent living, working and employment. The law stresses the state's responsibility to ensure access to various support services, information, objects and communication.<sup>50</sup>

The law specifies the obligations of administrative organs to ensure full accessibility of their services to PwDs, including the needs-based, adapted programs and materials.<sup>51</sup> Ministry of IDPs from the occupied territories, labour, health and social affairs of Georgia has specific responsibilities to provide accessibility of social and employment services for all PwDs, as well as rehabilitation/habilitation, also to ensure diversity and geographic accessibility of social

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<sup>47</sup> Decree of the Parliament of GEorgia 13 October 2005 №1938 on Ratifying Framework Convention on Protection of National Minorities, Para. 2 (b).

<sup>48</sup> Organic Law of Georgia on State Language, Article 9, 11, 12, 20, 24.

<sup>49</sup> Law of Georgia on Rights of People with Disabilities, 2020, Article 1.

<sup>50</sup> Ibid., Article 4.

<sup>51</sup> Ibid., Article 21.

services, to plan and design programs for PwDs while also considering the evidence collected about their need.<sup>52</sup>

Despite necessary normative regulations on service accessibility, the law, unfortunately, says nothing about ethnic minority PwDs, about their challenges (including those related to the language policies and informational vacuum) and about the visions to overcome these challenges, which, in the end, makes the law very insensitive to this group of people.

We see the same problem with other legislative acts too. For example, the law of Georgia on Social Assistance, the Labor Code<sup>53</sup> of Georgia and the law of Georgia on Promotion of Employment establish state responsibilities towards PwDs concerning social protection and labour rights realisation, but they concern the general population of PwDs and do not mention any specific measures for overcoming barriers ethnic minority PwDs face.<sup>54</sup>

#### - Relevant policy documents

Parallel to legislative acts, we should look at policy documents that the executive and legislative branches have approved at different times. First, we must mention the national SDG document, which aims to promote the local implementation of global-level sustainable development goals.<sup>55</sup> The document determines objectives that correspond to Georgia, the national indicators and target amounts for measuring the effectiveness of relevant policy interventions, uses such units as the number of social package beneficiaries, the number of people living under the median income level, including disaggregation according to disability status, and the number of PwDs employed in public service.

The National Human Rights Strategy is another important policy document. It covered the period of 2014-2020, and it enshrined measures that need to be taken but the state for the protection of the human rights of the entire population, including the protection of the rights of ethnic minorities and PwDs.<sup>56</sup> Similar to the Strategy, the Action Plans<sup>57</sup> approved for the implementation of the Strategy did mention various government obligations about promoting independent living of PwDs, promoting ethnic minority participation in social, economic,

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<sup>52</sup> Ibid., Article 26.

<sup>53</sup> The Labor Code prohibits discrimination at work on the basis of ethnicity. See the organic law of Georgia “Labor Code”, 2010, Article 2 (3), 4 (1).

<sup>54</sup> See the Law of Georgia on Social Protection, 2006, Article 12(1), the organic law of Georgia. The Labor Code, 2010, Article 8, 9, 23, 27, 28, 77, 79, Law of Georgia on Employment Promotion, 2020, Article 15, 34-36, 42.

<sup>55</sup> National Document for Sustainable Development Goals <https://bit.ly/3NVeWgD>.

<sup>56</sup> Decree №2315 of the Parliament of Georgia, 30 April 2014 – on the Approval of the National Human Rights Strategy (2014-2020), Strategy priority N.12 and N.15

<sup>57</sup> See Decree of the Government of Georgia №445, 9 July 2014 on the Approval of the Human Rights Protection Action Plan (2014-2015) of Georgia and on creation the interagency coordinating council and the approval of its statute for the implementation of the Government Action Plan for Human Rights Protection (2014-2015); The Decree of the Government of Georgia №338, 21 July 2016, on the Approval of the Government Human Rights Action Plan (2016-2017); The Decree of the Government Georgia №182, 17 April 2018, on the Approval of the Government Human Rights Action Plan (2018-2020).

cultural and political life, and ensuring information accessibility for ethnic minorities and PwDs.

Looking at different Strategies and Action Plans, it is obvious that in case of their effective implementation, it would have been possible to transform ethnic minority PwD rights protection policies and to take needs-based measures related to the assignment of status, employment, access to social services or other accessibility matters. Unfortunately, the Government of Georgia couldn't manage the full, timely and effective implementation of these documents, which makes the existing policies towards such groups stagnant and leaves their rights condition unchanged for years.

The Government of Georgia initiated and approved the National Human Rights Strategy 2022-2030.<sup>58</sup> The Strategy has separate sections and objectives for protecting the rights of ethnic minorities and PwDs. Despite all, numerous issues are omitted for adequate protection and to guarantee these groups' independent living. There are various matters ignored or inadequately covered in the Strategy:

- Specific objectives for PwD social protection and employment;
- Collecting statistical information on PwDs;
- Real and effective participation of the PwD community in state decision-making;
- General formulations that ethnic minority and PwD community needs shall be considered in the process of providing state services that don't specify specific state responsibilities in this field;
- Consideration of linguistic barriers for ethnic minorities and the necessity of changes in the state policies when providing information and services.

Parallel to the human rights strategy, we should bring up the National Strategy on Civic Equality and Integration and its Action Plan, which have been approved twice in the recent past, in 2015 and in 2021.<sup>59</sup> The documents mentioned above formally declared the importance of protecting ethnic minority rights equally with others and effective civic integration. It also established the Strategy goals to promote civic services, interagency coordination, and elaboration, as well as implement united, uniform and coherent state policies for ethnic minorities.

Considering the numerous challenges that ethnic minorities face, the National Civic Equality and Integration Strategy 2021-2030 distinguished five core priorities: 1. State language for promoting integration 2. Access to quality education 3. Equality, Civic and Political participation; 4. Social and Economic integration; 5. Intercultural dialogue.

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<sup>58</sup> National Human Rights Strategy of Georgia 2022-2030, №07- 2/181/10; Registration date: 5.09.2022, <https://bit.ly/3BOwtCr>.

<sup>59</sup> Order of the Government of Georgia №1740, 17 July 2015, on the Approval of the Civic Equity and Integration Strategy and the 2015-2020 Action Plan; Decree of the Government of Georgia №356, 13 July 2021, on the Approval of Civic Equity and Integration Strategy 2021-2030 and the 2021-2022 Action Plan.

Numerous activities are listed in the Strategy and the Action Plan under the mentioned core priorities. The following are most important for research purposes:

- Improvement of Access to public services, as well as to information for ethnic minority representatives; Increasing ethnic minority participation in state socio-economic programs;
- Improving the knowledge of the state language;
- Improving collection, analysis and accessibility of statistical information;

It is worth mentioning that none of the Civic Equality and Integration Strategies mentions the needs of ethnic minority PwDs and how to tackle the challenges they face. The only exclusion is the 2021-2030 state Strategy and the 2021-2022 Action Plan in the objectives on education.<sup>60</sup> This problem, next to many others, is a significant flaw of the Strategy and excludes the possibility of identifying and supporting the socio-economic vulnerabilities of these PwDs by the state.

Ultimately, the national legal and policy framework analysis shows that the needs of ethnic minority PwDs and their vulnerability are not reflected in any normative acts or policy documents. The legislation and policy frameworks regulating PwD rights, the National Human Rights Strategy, and the National Civic Equality and Integration Strategy and Action Plan are purposefully not distinguishing them as subjects with particular vulnerabilities and neglect that need to tackle their social exclusion and adequate support measures.

Besides, unfortunately, the existing system still neglects standards established by international agreements, particularly by the Framework Convention on National Minorities, as well as the standards of the Advisory Committee of the Convention on collecting detailed statistical information about ethnic minorities, as well as about services received in native language by ethnic minorities and information received about the same services and support mechanisms in their native language. In the end, the above-mentioned turns ethnic minority PwDs into second-class citizens, killing their chance to be at least minimally informed about basic services and participate in public life.

## 2. Access to service for PwDs – general context

Before assessing accessibility barriers to the central government-level services and mechanisms by ethnic minority PwDs, it is essential to start with the general context and systemic barriers

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<sup>60</sup> Promoting the educational needs of the ethnic minority representatives (PwDs and Roma) outside the education system.



for all PwDs before they start independent living and realise their rights.

Issues discussed below are surfacing not only when analysing international or local standards or reports, but these were mentioned by ethnic minority PwDs during focus groups not once.

#### - The medical model of PwD assessment

UN CRPD entirely transformed approaches to PwD issues. One is refusing the medical model of PwD assessment and policy making and establishing a social and human rights-based paradigm. Yet before its adoption, the Convention rejected PwD approaches and policies based solely on medical diagnosis, and it said that disability is not only a medical condition but a result of existing barriers that deprive PwDs of equal participation in public life.<sup>61</sup>

Even though the Convention was ratified in 2014 in Georgia, the country couldn't fundamentally transform its policies. Until now, it uses the medical model towards PwDs. More specifically, according to special legal norms<sup>62</sup>, the assessment of PwD needs and assignment of disability status to them still happens based on a medical diagnosis, which makes it impossible to assess the real needs of this group and the barriers that exist in society, which on its hand makes impossible to provide evidence-based and effective support to this group.

The law of Georgia on the Rights of People with Disabilities obliges the MoIDPLHSA, to ensure the approval of a plan for the implementation of the biopsychosocial PwD status assignment mechanism<sup>63</sup> before the 1st of January 2023, which postpones the social model establishment to an unknown time in future.

#### - Social package amount

One of the most problematic and acute issues that PwDs face is the paucity of the social package (the so-called disability pension). Monetary assistance to this group is regulated by the Government's decree about „Determining Social Package”, according to which PwDs with significant disability and PwD children receive 275 Lari each month, people with less substantial disability – 140 Lari, while moderate and inherently disabled<sup>64</sup> get only 100 Lari.<sup>65</sup>

The paucity of the social package, which in the case of people with less significant and average

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<sup>61</sup> UN CRPD, 2006, Article. 1.

<sup>62</sup> Law of Georgia on Medical-Social Expertise, 2001; The Order of the Minister of Health N.1, 13 January 2003 on the Approval of the Instructions for Determining a Disability Status.

<sup>63</sup> The law of Georgia on the Rights of People with Disabilities, 2020, Article 37 (2).

<sup>64</sup> Notice: This does not include people with a disability due to participating in military operations for Georgia's integrity, freedom and independence or in military operations in different territories.

<sup>65</sup> The Decree of the Government of Georgia №279, 23 July 2012, Determining Social Package, Article 5.

disability is even less than a subsistence minimum<sup>66</sup>, is even more problematic when PwD participation in the labour market is meager<sup>67</sup>. Therefore, frequently, these people only have a social package, which is barely enough for physical existence.

Notably, in October of the current year, the Parliament of Georgia registered a bill introducing changes to the law of Georgia on Social Protection, according to which social package will gradually grow by being indexed. Additionally, the social package will increase by 65 Lari for people with significant disability and children with disabilities and 35 Lari for those with less substantial and average disability.<sup>68</sup>

Despite the significance of the increase in the social package, it must be noted that its amount is still below the subsistence minimum for people with less significant and average disability and will barely satisfy the basic needs of this group.

- Insufficiency of services

One another important challenge that the PwD community, as well as actors working on their rights, stress out is the lack of various types of support services and problems with their accessibility. Despite legal guarantees,<sup>69</sup> beyond the social package and one-time allowance, there is a lack of sustainable services, and they are not underpinned by the PwD needs assessment. Besides, the existing services stay unchanged from year to year.

Additionally, despite different needs across the whole of Georgia, PwD support services are mostly concentrated in the capital, and a few big cities and people living in the region have no opportunity to access them.<sup>70</sup> PwDs living in different municipalities across Georgia cannot receive psychosocial rehabilitation, daycare centre services, early development services, personal assistants' or home care services. Lack of Access to such significant services strongly influences the quality of PwD participation in public life and creates a significant barrier to exercising practically any right or freedom.

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<sup>66</sup> See: <https://bit.ly/3Sfsh4w>.

<sup>67</sup> According to the Ombudsman Report presented to the Parliament on 1 December 2021, a total of 38 PwDs were employed by the state employment promotion programs and services and 128 by the public employment sector; See the Report of the Human Rights Defender of Georgia about the Condition of Human Rights and Freedoms in Georgia, 2021, pg. 288.

<sup>68</sup> Georgian Bill №07-2/199/10 on Amendments to the Law of Georgia on Social Assistance, <https://bit.ly/3glhFDI>.

<sup>69</sup> The Law of Georgia on the Rights of People with Disabilities

2020, Article. 10, 20, 26, 35.

<sup>70</sup> Human Rights Defender has been stressing the geographic inaccessibility of services for years. See the Ombudsman's report about human rights and freedoms in Georgia, 2021, pg. 283.

### 3. Access to services by ethnic minorities – challenges in Kvem Kartli

Numerous barriers were identified when assessing the problem of accessibility of the central government-level services for ethnic minority PwDs, which require effective policy response by the state. The following chapter aims to review systemic challenges facing this particular group and evaluate the accessibility of central-level services.

#### 3.1. A systemic challenge of accessibility to the central-level mechanisms – description of an overall context

The lead problem among systemic challenges that ethnic minority PwDs face regarding service accessibility is the state language policy that leaves the community in an informational vacuum about the services.

Another systemic barrier concerns the absence of general statistical data and the disaggregation of data by ethnicity, making it impossible to adequately identify special needs and implement targeted policies in this regard. Parallel to what was mentioned above, community participation in the state decision-making process is quite problematic, and it has entirely removed the ethnic minority PwDs from the sight of state officials.

##### 3.1.1 Absence of relevant statistical information

Despite the significance of having statistical information involved in policy planning and implementation and its effective monitoring, the state has not yet created a methodology for collecting and analysing data on PwDs that could comply with international standards. The MoIDPLHSA only gathers information on social package recipients, which fails to count all persons with disability with the already flawed medical model of disability status assignment. This system excludes people with moderate disability who were not disabled from childhood; additionally, it excludes those PwDs who started receiving old-age pensions and are refused social packages on these grounds.

According to the LELP Social Service Agency database on state assistance recipients, there are a total of 125 467 persons with a disability registered in Georgia<sup>71</sup>. Among them, 13 343 are children with disability; 29 070 are persons with significant disability status;

The state doesn't have information on how many ethnic minority PwDs live in the country. This means that representatives of this group are out of the state's purview and it is impossible to have any kind of evidence based policy planning in their regard.

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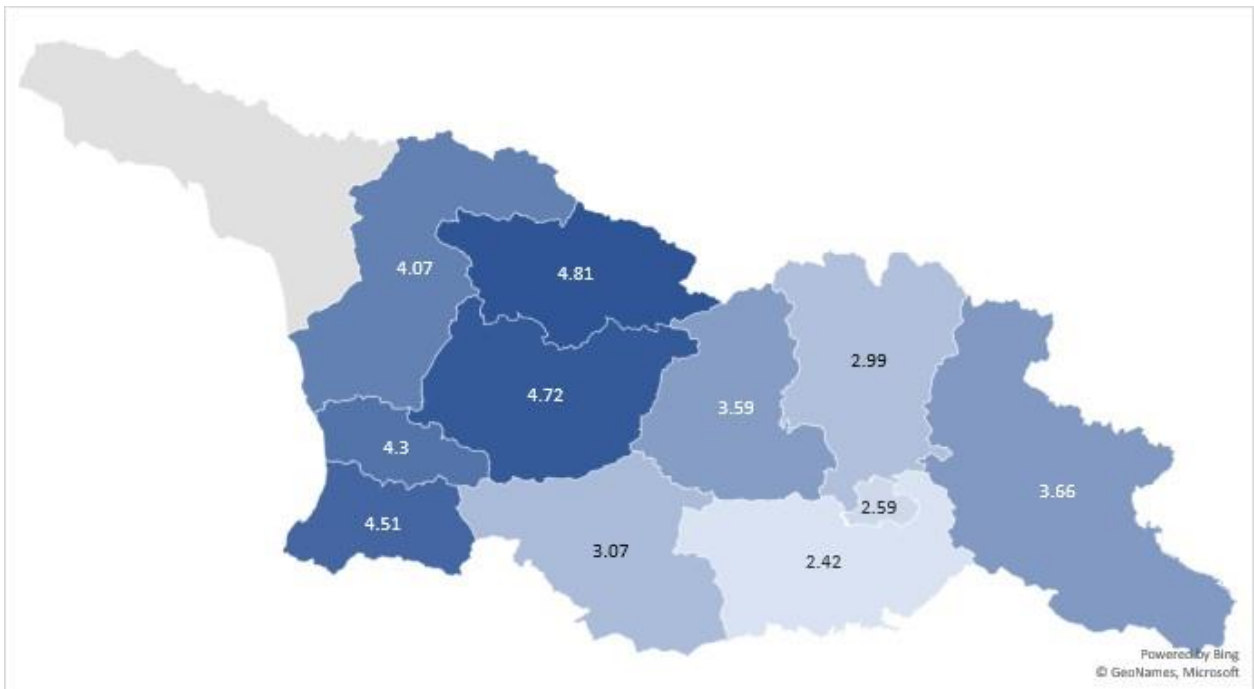
<sup>71</sup> See the statistics by the LELP Social Service Agency <https://bit.ly/3yqHrw6>.

74 420 are persons with less significant disability status; and 10 632 are persons with moderate disability status. The Agency has this data sorted according to sex, age, and region.<sup>72</sup>

According to the World Health Organization, at least 15% of the world's population has some disability<sup>73</sup>. Each country shall have a similar share of PwDs in their population. According to studies, this share varies between 11.8% (in upper-income countries) -18% (in lower-income countries)<sup>74</sup>. The number of PwDs living in Georgia (according to the number of social package recipients) is much lower than the global average, which shows that only 1/3 of the actual number is revealed.

Besides, as mentioned above, despite international standard requirements, the state doesn't collect statistical information about ethnic minority PwDs.<sup>75</sup> It only collects information about the social package recipients according to regions and municipalities.

Graph №1. The share of social package recipients in the overall population of Georgia (%)



<sup>72</sup> An official correspondence with MoIDPLHSA, N MOH 1 22 00173448; 2.08.2022.

<sup>73</sup> World Health Organization, World Report on Disability, Summary, 2011, pg. 7.

<sup>74</sup> World Health Organization, World Report on Disability, 2011, pg. 27.

<sup>75</sup> An official correspondence with MoIDPLHSA, N MOH 1 22 00173448; 2.08.2022.

The absence of statistical information is a barrier to identifying ethnic minority PwD needs, as well as to identifying systemic barriers they face and for effective policy interventions to eradicate them. A representative from the MoIDPLHSA also spoke about the absence of statistical information on ethnic minority disabilities being a barrier to assessing ethnic minority PwD inclusion in services.<sup>76</sup> Although their speech mentioned some visions about transforming the state data analysis approaches.

The number of PwDs is inadequately low in every region of Georgia. Nonetheless, the numbers are the lowest in Kvemo Kartli. This indicates to the barriers that Kvemo Kartli population faces with regard to PwD status acquisition, and leaves even more PwDs without state assistance. In the three Kvemo Kartli municipalities the number of PwDs is lower than the regional average. Tetrtskaro has 2.07%, Gardabani 2.28% and Tsalka 2.3%.

„Personal IDs don't also mention ethnic identity. We can't ask people about their ethnicity when they come for pensions. They are all citizens of Georgia to us, who satisfy the requirements, and we assign pensions to them, and we don't collect statistical data on ethnicity.”

MoIDPLHSA representative.

### 3.1.2 State policies

The language barrier and the state inactivity are the two main barriers to access to central-level services for ethnic minority PwDs. According to the 2014 population census, 73.9% of ethnic Azerbaijani citizens of Georgia don't know the Georgian language fluently. This is majorly caused by the weaknesses of the state education policies that have for years ignored the challenges that ethnic minorities face and their needs.<sup>77</sup>

It is worth mentioning that the state language policies create barriers for ethnic minorities to access services and information not only on the central but also on the municipal level<sup>78</sup>. The city councils and city halls of the municipalities with compact ethnic minority settlements don't translate necessary materials into the language of national minorities, for example, the citizens' applications, complaints, responses of the administrative organs (including the public information notices), or the relevant normative acts<sup>79</sup>. Therefore the ethnic Azerbaijani citizens

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<sup>76</sup> An interview with the MoIDPLHSA representative.

<sup>77</sup> To read about education problems, please see the study of the Social Justice Center: Systemic challenges of the education policy towards the ethnic minorities in Georgia, 2020, <https://bit.ly/3tLinx5>.

<sup>78</sup> Advisory Committee on the Framework Convention for the Protection of National Minorities, Third Opinion on Georgia, ACFC/OP/III(2019)002, 2019, Para. 103.

<sup>79</sup> Strengthening Political Participation of Ethnic Minorities in Marneuli Municipality, Social Justice Center, 2020, <https://bit.ly/3EpnEs>; Social Justice Center, public statement: “EMC sued Marneuli Municipality and City Council for not providing

are compelled to translate such documents at their own cost when they don't know fluent Georgian and when they necessitate basic information.<sup>80</sup>

Of course, these regulations impede the opportunities for PwDs to receive basic information due to their socio-economic vulnerability and paucity of the social package. They have an additional financial barrier compared to the rest of society. At the same time, this also neglects the UN CRPD and Council of Europe Framework Convention regulations about unhindered access to service and information.

„It is not our fault that we don't know the language. When I went to school, we had only a thirty-minute [class] a day in a week. We haven't had a chance to learn the language.”

A person with a disability residing in Dmanisi and seeking a disability status.

When asked how they manage to serve national minority representative PwDs, the MoIDPLHSA representative said that the local units of the State Care Agency try to employ locals to help this population apply to the Ministry with different requests or to get a consultation.<sup>81</sup>

These statements show that the state doesn't have a unified and systematic policy towards ethnic minority PwDs for the provision of information in the language they understand. Any state measure in this regard is a result of a goodwill of a concrete territorial organ or is based on individual employees' linguistic capacities.

Additionally, despite the efforts mentioned by the Ministry representative above, ethnic minority PwDs live in a radically different reality. In the situation when the state ignores its responsibilities on information accessibility, the whole burden of overcoming the language barriers during communication with the administrative organs and/or with the social workers lies on ethnic minority PwDs themselves,

For example, the social workers say language creates the greatest barriers when communicating with ethnic minority PwDs<sup>82</sup>.

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translated materials in Azerbaijani language”, 2019, <https://bit.ly/3TT05HJ>.

<sup>80</sup> Public statement of the Social Justice Center: „EMC sued Marneuli Municipality and City Council for not providing translated materials in Azerbaijani language”, 2019, <https://bit.ly/3TT05HJ>.

<sup>81</sup> An interview with the representative of MoIDPLHSA.

<sup>82</sup> Focus group discussion with social workers employed in Kvemo Kartli.

“The language barrier exists, but the youth already understands Georgian. And if they don’t, they are accompanied by someone, or if we visit them, there is a neighbour who helps to communicate.”

Tetritskaro municipality social worker.

“Mainly, we have conversations in Russian. They rarely know Georgian. Sometimes the relatives or acquaintances facilitate translation into Russian or Azerbaijani languages.”

Marneuli municipality social worker.

Both the community and the social workers mention that communication between them is mainly in Russian. In case of not knowing this language PwDs are obliged to communicate with the state with the help of family members, relatives and/or neighbours.

Even in the absence or presence of a nonformal translator (in case of communicating in Georgian or Russian languages), social workers find it hard to go in-depth with the beneficiaries and provide exhaustive information about existing services.

„How can a social worker provide exhaustive information on legislation to their beneficiaries in the Russian language? We don’t know how this is possible.”

Kvemo Kartli social worker.

### 3.1.3. Informational deficit and non-participation of the community

The language barriers and state passivity makes ethnic minority PwDs feel abandoned by the state and trapped in an informational vacuum. Parallel to this, the state still has not elaborated a national standard for informational accessibility.

„We are left out of many things due to the language barrier. We learn things from one another; then we find someone who knows Georgian and can confirm or refute this information.”

A person with a disability residing in Bolnisi municipality.

„The main problem that the community members think we have is the lack of information and the informational vacuum. In most of cases, we know nothing of what happens. The laws admitted up high don’t reach us and vanish on their way to us.”

A person with a disability living in Marneuli.

The Human Rights Defender Office representative also confirms that for the ethnic minority PwDs, information accessibility is the number one problem.

„In general, we know what challenges are associated with informational inaccessibility for PwDs, and we can imagine the language barriers on top of that.”

The Human Rights Defender Office representative

Due to this, ethnic minority PwDs and their family members don't have access to information about PwD rights, protection, and complaint mechanisms.<sup>83</sup> The feeling of an informational vacuum is particularly acute for those PwDs who live not in the cities but in remote villages.<sup>84</sup>

Besides, the small portion of focus group participant PwDs who possessed information about applications to state organs, or the complaint procedures, did not have trust and hope for positive changes regarding existing institutional mechanisms.

„If I had the means to do so [I would apply to the state], but who will consider my application?”

A person with a disability residing in Bolnisi.

Low levels of trust are also mentioned in the Institute of Social Research and Analysis research in 2019. It says that only 30.9% of the ethnic Azerbaijani community believed that the central Government of Georgia cared about the problems and needs of their ethnic group. At the same time, 58.5% thought the central Government treats ethnic minority representatives as full-fledged citizens.<sup>85</sup>

Despite the Ministry of IDPs from the Occupied Territories, Labour, Health and Social Affairs of Georgia coordinating development and implementation of social policies,<sup>86</sup> which must also comprise raising awareness activities about the central level social programs, the Ministry is practically a second-grade institution when it comes to information provision to the national minorities. **More specifically, according to the information provided by the Ministry, the lead institution for providing information to the mentioned groups is the Office of the State Minister for Reconciliation and Civic Equity. The representatives of the Ministry of Internally Displaced Persons from the Occupied Territories, Labor, Health and Social Affairs of Georgia, instead of organising informational campaigns, only take part in the meetings organised by the State**

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<sup>83</sup> An interview with a PwD rights department representative at the Ombudsman's office; Focus group discussions with PwDs and their family members living in Dmanisi, Bolnisi and Mameuli municipalities.

<sup>84</sup> Focus group discussion with Kvemo Kartli social workers.

<sup>85</sup> Institute of Social Research and Analysis, A study on ethnic minority participation in politics, 2019, pg. 48-49.

<sup>86</sup> Law on Social Assistance, Article 16.



Minister's Office.<sup>87</sup> The policy approach according to which the Office of State Minister for Reconciliation and Civic Equity is mandated to only coordinate but has no sufficient budgetary resources for effectively implementing activities, and is made into a lead institution for addressing the issues listed above, speaks for the fact that the ethnic minority representatives, as well as PwDs, are not the primary target of the informational campaigns of the Ministry of Internally Displaced Persons from the Occupied Territories, Labor, Health and Social Affairs of Georgia. The system excludes ethnic minority representatives unfairly and without any justifications from all kinds of communication it has with the general population.

When asked what measures the Ministry takes to inform PwDs about their rights, as well as about the social benefits allotted for them in Kvemo Kartli, the authorities gave us information about only three cases:

- The campaign of June-August 2018 was organised by the State Minister's Office and aimed to raise awareness about and accessibility to state social programs (social rehabilitation and subprograms of the child care state program).<sup>88</sup> As part of this campaign, meetings were held in different regions of Georgia (Kvemo Karli: Marneuli, Gardabani, Tsalka, Dmanisi, Bolnisi municipalities) for the local population. According to the information the Ministry provided, the participants were handed brochures about the subsistence allowance, how it is issued and administered, as well as about the childcare services and their varieties;
- In May of 2021 employment coordinators of the State Employment Promotion Agency participated in the meeting with the PwD alliance members organised by 'Salam' platform. The Agency representative spoke about the state employment promotion programs to the meeting participants.
- In June 2022, the Office of the State Minister for Reconciliation and Civic Equity organised an informational campaign. The State Minister's Office and the Employment Promotion Agency representatives organised meetings with the population of Gardabani, Marneuli, Bolnisi, and Dmanisi municipalities to introduce social programs to the ethnic minority groups. At this meeting, participants received brochures in the Azerbaijani language.

Unfortunately, the information provided by the Ministry does not include any data on the number of participants (including the number of PwDs) and the ethnic minority participation levels. Therefore, it is hard to assess how the aims of the meeting were achieved and what were the effects of it on ethnic minorities.

Additionally, a MoIDPLHSA representative said that such information to the ethnic minority representatives is not part of a coherent policy and that the state does not have the plan to

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<sup>87</sup> Official correspondence with the MoIDPLHSA, N MOH 1 22 00173448; 2.08.2022; An interview with the representative of the MoIDPLHSA.

<sup>88</sup> Official correspondence with the MoIDPLHSA, N MOH 1 22 00173448; 2.08.2022.

provide information to this group of PwDs.<sup>89</sup>

Same as MoIDPLHSA, its sub-agencies too (LEPL Social Service Agency and LEPL Agency for State Care and Assistance for the Statutory Victims of Human Trafficking) don't provide information accessible in ethnic minority languages,<sup>90</sup> which contributes to the informational vacuum for this community. Parallel to such challenges, there is a critical lack of ethnic minority participation in decision-making. Since 2021, two political platforms on the central government have served in PwD policy formulation and the PwD community participation.<sup>91</sup>

- UN CRPD Implementation Interagency Coordinating Committee – exists on the level of the Government Administration, and its goal is the interagency coordination of the implementation of the local legislation and the Convention, as well as the identification of gaps and solving them. Next to the Committee, we have a Consultation Council that is comprised of PwDs and organisations working on their rights. No member of the Council with a PwD with an ethnic minority background.
- A Joint Coordination Council for Implementing Law of Georgia on the Rights of Persons with Disabilities exists at the MoIDPLHSA level. It aims to include the PwD community and organisations working on protecting their rights in the implementation process of the local legislation. There are four working Committees working at the level of this Council. Committees work on such topics as implementing the biopsychosocial model for PwD status identification; deinstitutionalisation; developing social services for PwDs, improving monitoring and evaluation; integrating PwD suggestions on a municipal level. As in the case of the first platform, no member of the mentioned Committees is an ethnic minority PwD.

Unfortunately, the state doesn't see this group's representatives as people with political agency. The central level agencies, unlike other PwD activists and organisations, haven't identified ethnic minority PwDs who need to be periodically provided certain information in languages accessible to them about ongoing political changes, state initiatives, about certain working groups or platform meetings.

“If you don't address the state and sternly request, you can't get a thing. The state pays no attention itself.”

A person with a disability living in Marneuli municipality.

What is more, not only are the ethnic minority PwDs absent from the interagency platform work, but no one in those groups has ever addressed the above-listed issues of human rights protection, of identifying challenges and ways of tackling them, and no work has been done

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<sup>89</sup> Interview with a MoIDPLHSA representative.

<sup>90</sup> Notice: the website is accessible only in English and Georgian languages.

<sup>91</sup> The Decree of the Government of Georgia №551, 29 November 2021, On the Creation and Approval of the Statue of the UN CRPD Interagency Coordination Committee; Order of the Minister of IDPLHSA, №01-332/O, 24 August 2021, on the Approval of the Statute and Members of a Joint Coordination Council on the Implementation of the Law of Georgia on the Rights of People with Disability.

in this direction either,<sup>92</sup> which also stresses out that the state fully ignores this group.

### 3.2. Access to central level mechanisms – basic tendencies

#### 3.2.1. Granting PwD status – procedural challenges

As mentioned above, PwD status is granted according to a medical model, according to a medical diagnosis. According to regulations, a medical institution issues a conclusion on granting the status to a person with a disability. Medical institutions are selected for a two-year period and granted the right to assign such status.<sup>93</sup> All across Georgia, there are no more than 70 medical institutions selected for this purpose by the LELP Regulation Agency for Medical and Pharmaceutical Activities operating under the MoIDPLHSA.<sup>94</sup>

The PwD status assignment process was strongly criticised by the local community representatives and their family members, who stressed that the existing system is unjust and is not adapted to people's needs. To them, how this or that status is assigned and how the status revision is substantiated is unclear.<sup>95</sup>

Besides, primary healthcare is a particularly problematic issue in regions densely occupied by ethnic minorities. These institutions must identify disabilities and refer people to respective institutions, liable to assign the status. But, according to the Human Rights Defender's Office, despite the significance of their functions, the primary healthcare specialists rarely assist the local population, mostly due to the lack of awareness amongst themselves and information about the referral procedures.<sup>96</sup>

Nonetheless, as PwDs note, they find communication with the healthcare institutions hard not only due to the abovementioned problems but also stigma and discrimination against them, which is further aggravated by the state language policies.

„They complain, why don't you know [the language] and are rude to us.”

A parent of a person with a disability in Dmanisi municipality.

„The way the doctors speak with the ethnic Georgians is different from how they speak to us. I think this is related to ethnicity and not the disability.”

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<sup>92</sup> Interview with a MoIDPLHSA representative

<sup>93</sup> The Order of the Minister of IDPLHSA №1/6, 13 June 2003, on the Approval of the Instructions for the Disability Status Determination. Appendix 1: Instructions on the determination of the disability status, Article 3(1).

<sup>94</sup> Ibid., A. 3<sup>2</sup>.

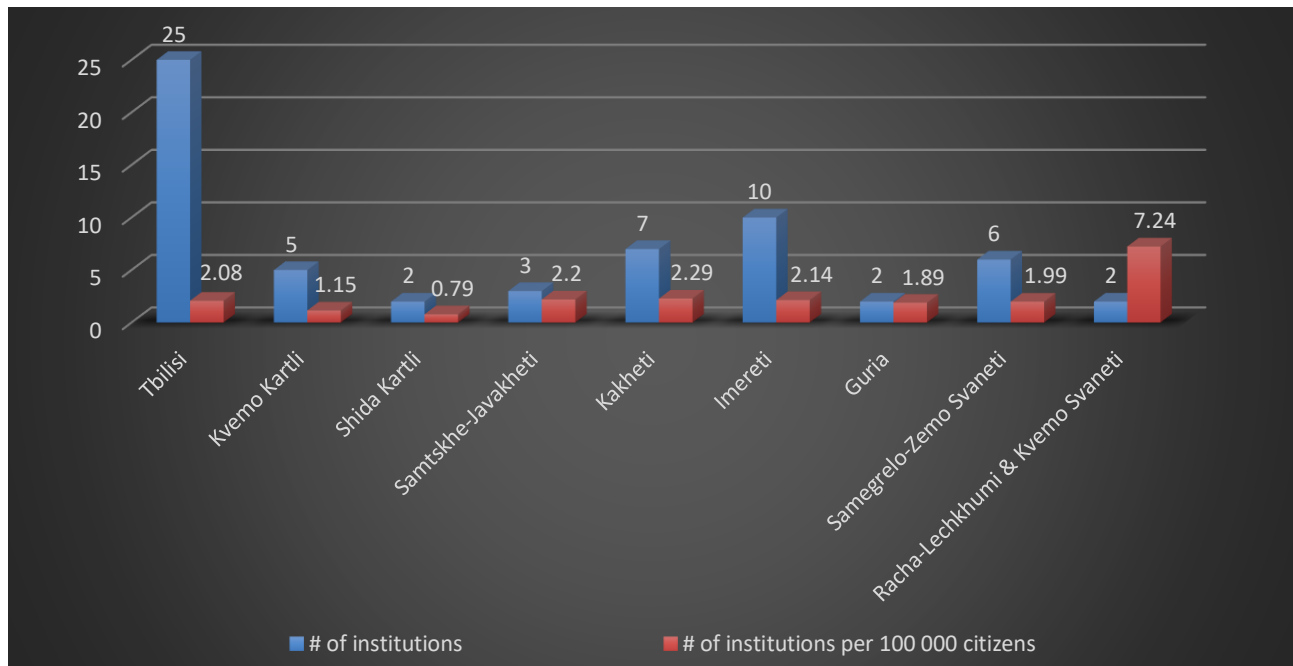
<sup>95</sup> Focus group discussions with PwDs and their family members in Dmanisi, Bolnisi and Marneuli.

<sup>96</sup> An interview with a PwD rights department representative at the Ombudsman's office;

A person with disability living in Marneuli.

Next to the challenges mentioned above, the geographic accessibility of the status-assigning institutions is also a problem. The existing data shows that for every 100 000 citizens Kvemo Kartli has the second to the last position according to the number of those institutions that conduct medical-social expertise for disability status determination purposes. Besides, these institutions function in only four municipalities of Kvemo Kartli – Rustavi, Gardabni, Marneuli and Bolnisi municipalities, while there are no such institutions in Tsalka, Dmanisi and Tetrtskaro municipalities.<sup>97</sup> In all such cases, the population has to travel to other municipalities.

Graph №2. The number of institutions (according to regions) that conduct medical-social expertise for disability status-determination purposes



<sup>97</sup> An official correspondence with MoIDPLHSA N MOH 1 22 00173448; 2.08.2022.

„Bolnisi resident has to travel to Marneuli to get a PwD status or to Rustavi. And one visit is not enough; you need several”.

A social worker from Bolnisi municipality.

„We are often addressed with requests about the status assignment, and we provide guidance. We don't have such specialists in Tetrtskaro and are obliged to refer people to the nearest territories. This is Marneuli in our case.”

A social worker from Tetrtskaro municipality.

„We don't have a chance to assign the status locally to children or adults. Therefore they must travel to Tbilisi. People prefer to travel to Tbilisi because there is no direct connection to Marneuli.”

A social worker from Tetrtskaro municipality.

In this case, the financial and time resource needed is very high because the person with a disability or their family member must also take care of transportation. The problems are harder when there is no public transport or lack of its accessibility, and it burdens the people themselves.

„Public transport inaccessibility is a problem. There is no way to get to Rustavi from Gardabani to acquire the PwD status there. Parents physically carry the beneficiaries. If people don't have automobiles, they are compelled to borrow or rent them, which creates additional barriers”.

A social worker from Gardabani.

Due to bureaucratic barriers and transport inaccessibility, PwDs postpone their applications or never apply for the state organs to acquire disability status. For example, one person with a disability from Bolnisi said that s/he had applied for the State Care Agency for status revision (to have changed the less significant disability status into a significant disability status, but he was told to travel to Tbilisi for this and apply there. Due to bureaucratic barriers, he still has not applied for this revision.<sup>98</sup>

Social workers living and working in Kvemo Karli said that in particular cases, municipalities and the State Care Agency do transport people to other municipalities to acquire the status, but

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<sup>98</sup> Focus group with PwD and their family members in Bolnisi.

of course, this is not part of an official policy and depends on a goodwill of particular persons and organs.

### 3.2.2. Access to social rehabilitation and childcare programs

The Government of Georgia annually renews state programs on social rehabilitation and child care and includes their central level support measures needed for different vulnerable groups (including Pwds, elderly, children, and youth). The program has such services as, for example, child rehabilitation/habilitation, early childhood development, daycare centre services, or provision of assistive objects.<sup>99</sup>

Access to social rehabilitation and child care services is related to numerous problems due to the needs and barriers that ethnic minority PwDs have and face. Additionally, as in all other cases, no data is disaggregated according to ethnicity about the PwD beneficiaries of the social rehabilitation and child care programs. We cannot fully assess the accessibility of these services for ethnic minority PwDs.

Accessibility is the biggest challenge in the case of services for PwD children. There is a big disparity between the number of children with disability living in Kvemo Karli and the number of places allotted by the service providers here. And this number lags far behind the numbers of other regions.

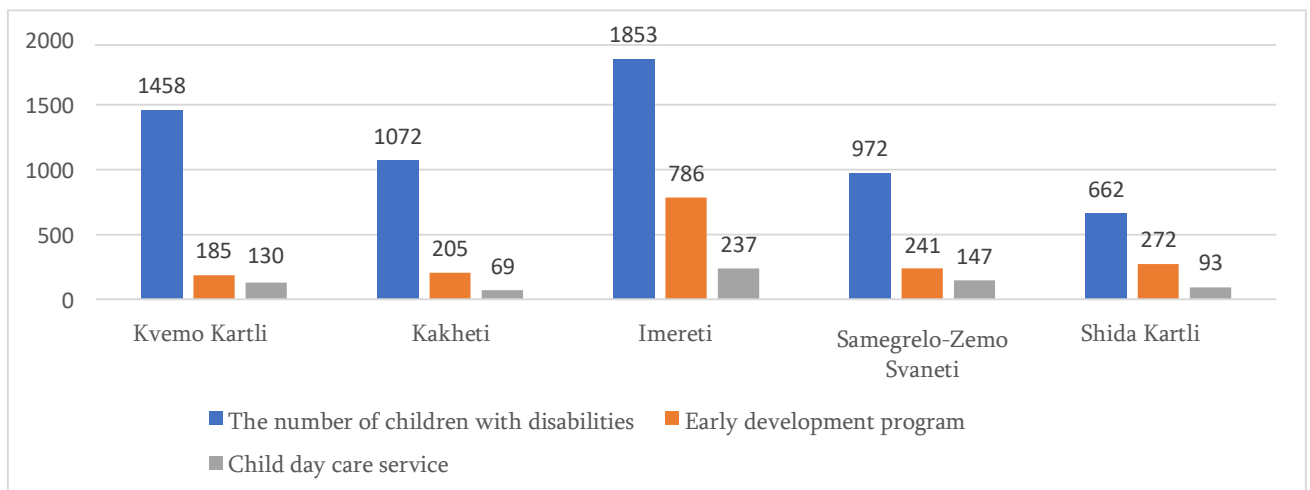
In general, the number of children with disabilities differs in different regions of Georgia and varies between 67 (Racha-Lechkhumi and Kvemo Svaneti) and 4 549 children (in Tbilisi). We compared the number of places in early development and daycare centres in Kvemo Karli, those with the regions where the number of children with disabilities is relatively close to the accounts in Kvemo Karli (1 458 children with disabilities).<sup>100</sup>

Graph №3. The number of children enlisted in early development and daycare centres across different regions of Georgia

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<sup>99</sup> Decree of the Government of Georgia №634, 31 December 2021, on the Approval of the State Program on Social Rehabilitation and Child Care.

<sup>100</sup> Note: This data doesn't include information about Adjara Autonomous Republic, because relevant programs are spread around the Adjara Central Government budget and the municipal budget of Batumi municipality.



In 4 (Gardabani, Dmanisi, Tetrtskaro and Tsalka municipalities) out of 7 municipalities of Kvemo Kartli, people have absolutely no access to early development and daycare centres, which has a very negative effect on the children living in this municipality.

Social workers distinguish this problem too, who say that daycare centres and early childhood development services are the basic need that the local population has at the moment, including the Azerbaijani community, and that they are the most frequently requested services too.<sup>101</sup> People must travel to other municipalities if a child needs such service.

„Mainly, our beneficiaries travel to Marneuli or Tbilisi to receive these services, which cost them a lot.”

A social worker working in Bolnisi Municipality.<sup>102</sup>

As the parents of children with disabilities note, they spend hundreds of Lari each month for transport, which negatively affects their budget.

„We need at least 500 Lari each month. As the petrol costs increase, these expenses will be higher.”

A parent of a child with a disability in Dmanisi municipality.

In cases when people still manage to subscribe to programs, the language barrier remains a problem. Due to this, some parents are compelled to use private services instead of public ones.

<sup>101</sup> Focus group with social workers working in Kvemo Kartli.

<sup>102</sup> Note: Tetrtskaro municipality social worker noted the same.

„It is a challenge when they ask for early development services in the Azerbaijani language when having speech disorders. Often people have to travel from Gardabani to Marneuli, or there is a private clinique in Rustavi that the City Hall funds in case of receiving a rejection letter. A rejection letter is created when the state programs don't fund the beneficiaries, and in those cases, the City Hall finances them.”

A social worker from Gardabani municipality.

„[Ethnic] Azerbaijanis want rehabilitation and other services in their native language. We only have one such service in Rustavi, and yet, state voucher system doesn't work there, it is a private clinique. There are plenty of requests that we issue a rejection letter so they can get a service at the private clinique – because there is no language barrier for them there. There must be at least one [service in Azerbaijani language] within the state voucher system.”

A social worker from Kvemo Kartli.

It's worth mentioning that the PwDs from Kvemo Kartli don't even have the necessary information about the few social rehabilitation and child care programs there already are. This was mentioned not only by the community but by the MoIDPLHSA too.<sup>103</sup> As mentioned above, the state doesn't have an active role in informing the community members. PwDs and their family members receive information about such services from non formal sources, mainly from people residing in their areas.<sup>104</sup>

Social workers have a special role in informing and enlisting the population in the state social rehabilitation and child care programs and in their other services. Despite the significance of their functions, the focus groups conducted with PwDs confirm that social workers' scope of work is extremely limited. No one from the research participants knew who their municipal social worker was, and others said they only learned of such a position during the focus group.<sup>105</sup>

„I just learned of this position. This also shows that there is not much information provided to us.”

A person with a disability living in Bolnisi Municipality.

When analysing the work of social workers, we can't ignore systemic challenges that exist in the state care system impeding social workers to manage cases and go indepth with their beneficiaries effectively. One such challenge is the scarce human and financial resources

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<sup>103</sup> An interview with the MoIDPLHSA representative; Focus group with Pwds and their family members from Bolnisi and Marneuli.

<sup>104</sup> Focus group meetings with PwDs and their family members living in Dmanisi, Bolnisi, and Marneuli municipalities.

<sup>105</sup> Ibid.



allotted to social work. There is also an extremely high workload for social workers and heavy labor conditions, as well as challenges related to transportation that are further aggravated by the need to travel not just to the administrative centres but to different villages of a municipality. As a result, social work can only be employed in emergency cases, while all the remaining cases are left unattended.<sup>106</sup>

In the end, the Human Rights Defender's representative said that due to a lack of awareness about services, in order to subscribe to central-level services, the population mainly addresses the local self-government for assistance. Although, due to a lack of awareness, municipalities often directly reject the citizens without referring them to respective organs, arguing that their subscription to central level services is not in their mandate.<sup>107</sup> The local population has had a lot of problems with this issue. One person with a disability mentioned that the State Care Agency did not officially register its application for a wheelchair, which was prepared by the applicant with the support of a municipality; for what reason, the person had to travel to Tbilisi and spend 200 Laris for that.

„I used the service of pawn shops to go there.”

A person with a disability living in Marneuli municipality.

### 3.2.3. access to employment promotion services

Despite great demand, there are slim chances of getting employed in a local community and limited access to employment-promoting services, which is also made obvious by the scarce statistical data provided by MoIDPLHSA. All this has a very negative effect on the socioeconomic background of people with disabilities and their families.

„I can work as a call centre operator, but who would hire us?”

„Unemployment is my biggest priority issue. In my opinion, the informational vacuum is what causes our unemployment. I can do a lot of stuff. I can work 8-10 hours.”

„I do receive social assistance, but how can that be enough? It would be great for me to have a job”.

People with disability living in Bolnisi municipality.

The Government of Georgia annually renews the employment promotion program that the

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<sup>106</sup> An interview with a PwD rights department representative at the Ombudsman's office.

<sup>107</sup> Ibid.

LELP State Employment Promotion Agency implements. It is a collection of different mechanisms for activating specific vulnerable groups economically.<sup>108</sup> As of 2022, the program is comprised of the following sub-programs:

- The subprogram for developing employment promotion services;
- The subprogram for growing the professional qualifications of job-seekers;
- The subprogram for promotion of employment at public works program.

The number of PwDs participating in this program has been very low for years and doesn't cover a big part of the community. MoIDPLHSA provided information about the total number of PwDs among the beneficiaries of specific subprograms<sup>109</sup>, and in the case of some of them, it provided information sorted by region too. As in many other cases, there are no statistics sorted by ethnic background in these programs, which disallows to fully assess accessibility of the programs and subprograms by ethnic minorities.

According to the information provided by the Ministry, only two sub-programs have information sorted by region:

- State program for subsidising the salary component at workplaces - according to the statistical information provided, the number of PwDs involved in the state subsidy program is extremely low. For example, only 8 PwDs benefited from this program in 2021 (Tbilisi – 6; Shida Kartli – 1 and Kakheti – 1), while only 1 person with a disability was consulted about participation in the program in the first 6 months of 2022. The scarce statistics show that this program has not covered Kvemo Kartli.
- Service of job coaches – job coaches mediate communication between people with disabilities and people with special educational needs on the one hand and potential employers on the other. According to the statistical data, the number of PwDs benefiting from job coach services is low, as is the proportion of PwDs compared to other regions.

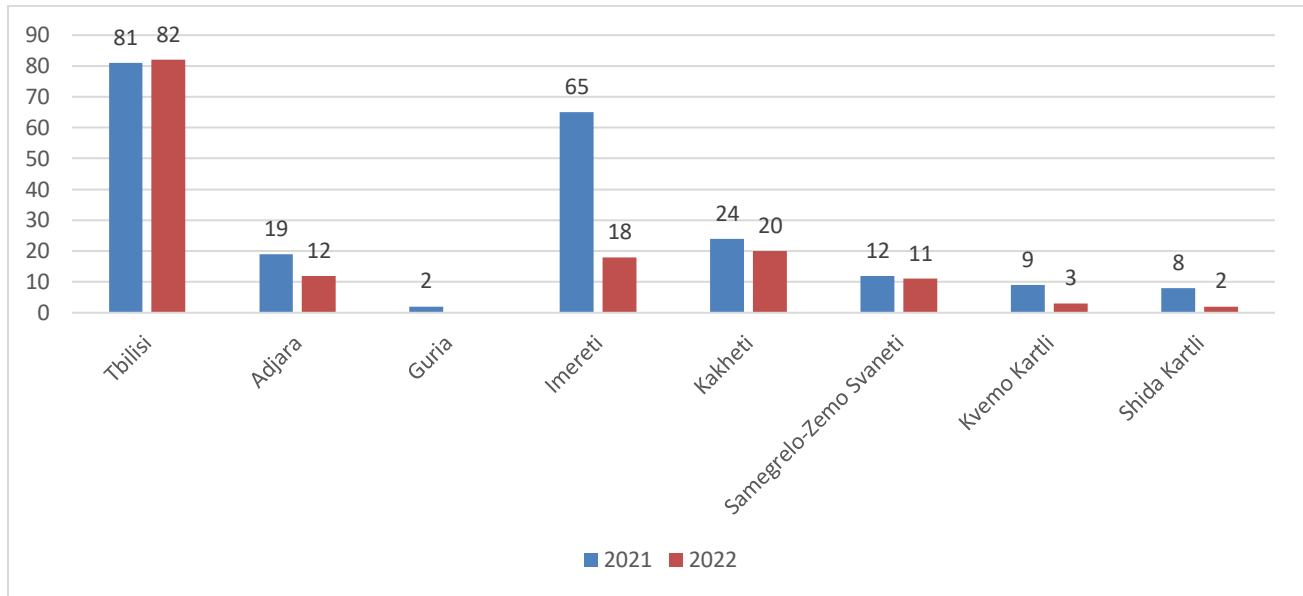
Graph №4. The number of PwDs benefitting from job coach services sorted by region<sup>110</sup>

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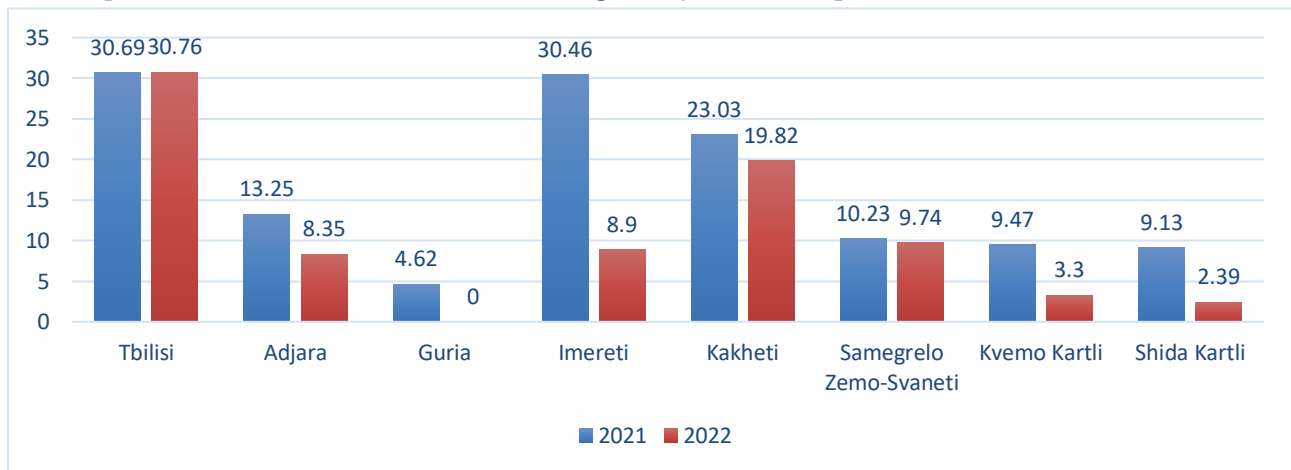
<sup>108</sup> Decree of the Government of Georgia №81, 17 February 2022, on the Approval of the State Policy on the Employment Promotion.

<sup>109</sup> For example, development of key competencies, professional training of job seekers, and increasing their qualification, an official correspondence with the MoIDPLHSA, N MOH 1 22 00173448; 2.08.2022.

<sup>110</sup> Notice: Statistics doesn't distinguish specific regions, such as Racha-Lechkhumi, Kvemo Svaneti, Mtskheta-Mtianeti, Samtskhe-Javakheti.



Graph №5. The number of PwDs benefitting from job-coaches per 100 000 citizens<sup>111</sup>



As with other services, ethnic Azerbaijani PwDs living in Kvemo Kartli are least informed about the services provided by the employment promotion programs. No PwD from focus groups knew anything about such programs.<sup>112</sup>

### Conclusion and main findings

This study identified numerous barriers and systemic problems that the ethnic Azerbaijani persons with disability face in Kvemo Karli with regard to accessibility of central-government level services, which

<sup>111</sup> Notice: Statistics doesn't distinguish specific regions, such as Racha-Lechkhumi, Kvemo Svaneti, Mtskheta-Mtianeti, Samtskhe-Javakheti. etc.

<sup>112</sup> Focus group meetings with PwDs and their family members living in Bolnisi and Marneuli municipalities.

eventually lead to the social exclusion of this community and hinder their equal participation in public life.

Various international standards recognise the vulnerability of ethnic minority PwDs and call for the state to take measures for identifying their needs and for eradicating challenges, amongst others, with regard to collecting statistical data, community members' participation, and the access to information and services.

Despite international standards, the situation in Georgia is radically different. Representatives of this group are fully invisible, excluded and neglected by the central Government. The central Government doesn't have ways to identify this group's members, comprehend the barriers they face and have the vision to overcome them with inclusive approaches.

When examining the needs of ethnic Azerbaijani PwDs, it becomes clear that the challenges other members of the PwD community face are pretty real and critical for them. We may name a few: the indecent way of assigning PwD status using a medical model, the scarcity of services and the paucity of the social package, which is hardly enough to satisfy their needs.

The research identified specific problems that necessitate urgent and effective state measures:

- The state language policy is one of the leading challenges to access to central-government level services and mechanisms by the ethnic minority PwDs. It fully excludes the possibility of using the native language at the stage of assessment and disability status acquisition and at all later stages when receiving services – which radically deepens this group's social exclusion and vulnerability. When establishing communication with state organs, the burden of overcoming the language barrier is fully on PwDs and/or on their family members. They are forced to communicate in Georgian or in Russian with the state;
- The existing state language policy hinders not only access to central-government level services and information for the ethnic minority PwDs, but also to the municipal level ones. The ethnic Azerbaijani population often has to pay the cost of translation services (for translating documents, applications, complaints, and letters from administrative organs) on its own due to the neglect of costs of translation by the state budget. Ensuring basic access to information this way is a particular financial burden for PwDs. In the end, existing state policies do not comply neither with the regulations of the UN CRPD, nor of the Framework Convention on National Minorities in terms of unhindered access to services and information;
- Language policy is a challenge even after subscribing to services – as the research showed PwD children's parents are forced to use private services over public ones (with the help of municipal funding) to get services in Azerbaijani language;
- The state language policy further aggravates the difficulties related to access to information that all PwDs living in Georgia already have. Due to an informational vacuum, PwDs living in Kvemo Kartli don't have information about the scarce amount of services that we have (social rehabilitation and child care, as well as employment promotion services), and cannot subscribe to them. They also don't have information about PwD rights and the ways to protect them. An absolute majority of focus group participants was also not informed about the social workers working in their municipalities, their functions, or their identity. This way, we have fully ignored international standards, particularly the UN CRPD standards, including Article 27 on PwD work and employment, Article 19 on independent living and participation in public life, Article 28 on social protection and adequate standards of living;

- The state cannot respond to the informational vacuum and takes no systemic measures to overcome this. What is more information on the MoIDPLHSA website and on the website of its LELPs, the LELP Social Service Agency and LELP State Care Agency, is not accessible in the national minority languages which further aggravates the problem of informational vacuum for the community. First and foremost, it goes against the rights reinstated by UN CRPD (Articles 9, 21);
- Information meetings about state services are scarce and unsystematic. Instead of MoIDPLHSA, the lead institution responsible for information dissemination is the State Minister's Office for Reconciliation and Civic Equity. Therefore, unlike the rest of the PwDs, the ethnic minority PwDs are not deemed as one of the target groups for the respective institution - the MoIDPLHSA and the general communication that MoIDPLHSA has with its beneficiaries makes this group excluded;
- Parallel to challenges related to the dissemination of information, the central Government practically bars the community from participating in the decision-making process. Ethnic minority PwDs are out of sight for the state, they are practically excluded from the work of all interagency mechanisms, and the state never brings up the barriers they face and the ways to overcome them. This goes against the UN CRPD principles about active and effective participation of PwD community in decision-making;
- Both the State Strategy and the Action Plan on Civic Equity and Integration, as well as the PwD right legislation and policy framework, ignores the fact that the ethnic minority PwDs have special vulnerabilities and don't distinguish the ways of overcoming social exclusion and the challenges they have in their lives;
- Despite international recommendations by UN CRPD and the Framework Convention on the Protection of National Minorities, the state doesn't sort statistical data according to ethnicity, which impedes the possibility to assess the impact of state policies towards this group. More specifically:
  - The state doesn't have information about the exact number of ethnic minority PwDs or of the social package beneficiaries among ethnic minorities;
  - The state does not know how many ethnic minority PwDs receive central-government level services (social rehabilitation and child care programs, employment promotion programs).
- Even in those conditions when the state doesn't sort the information according to ethnicity, the information provided by MoIDPLHSA shows the grave conditions in Kvemo Kartli:
  - Kvemo Karli has identified the least number of PwDs and covers the least number of them by the social package program. The overall percentage of PwDs is 2.42% in this region. Three municipalities have rates lower than the regional average: Tetrtskaro municipality 2.07%, Gardabani municipiplitly 2.28%, Tsalka municipality 2.3%;
  - Kvemo Karli is the second last municipality in the country, according to the number of medical institutions conducting medical-social expertise for disability status recognition, per 100 000 citizens. Tsalka, Dmanisi, and Tetrtskaro municipalities have no such institutions at all, and the residents of these municipalities are compelled to travel to other places, which requires a lot of time and financial resources.
  - The ratio between the number of places allotted by daycare centres and early development subprograms in Kvemo Kartli, on the one hand, and children with disabilities living on this

territory, on the other hand, is very disproportionate. The ratio falls far behind the percentage of different other regions of Georgia. The number of places allotted here also falls behind those regions with fewer children with disabilities. Besides, Gardabani, Dmanisi, Tetritskaro and Tsalka municipalities don't have such programs. Parents of children with disabilities have to carry the burden of transportation which is connected to big financial and time expenditures.

- According to the available statistics, the number of ethnic minority PwDs receiving job coaching services is very low, as is its ratio with the overall number of PwDs living in regions, and it falls far behind a number of regions (Adjara, Kakheti, Imereti, Tbilisi municipality, Samegrelo-Zemo Svaneti).

## Recommendations

Considering the number of barriers that the ethnic minority Azerbaijani PwDs face, the central Government of Georgia must take urgent steps in the following directions:

- Distinguish ethnic minority PwDs as one of the most vulnerable and neglected groups by local legislation and policy documents. Distinguish their needs, and, following the evidence, establish short and long-term plans for eradicating barriers faced by this group;
- Develop a coherent information dissemination policy that will correspond to the state's responsibilities to systematically and fully inform ethnic minorities and PwDs among them. This policy should encompass state responsibilities about informing this group in their native language about PwD rights, existing services and initiatives, policy changes, and grievance mechanisms in case of complaints;
- Develop a uniform standard for information accessibility for PwDs, that can provide unhindered access to information for all PwDs despite their needs and linguistic belongingness;
- Prior to developing a uniform standard for information accessibility, provide free translation services for ethnic minority PwDs so that they are enabled to communicate with the state institutions, medical institutions (particularly those that work on disability status assignment), as well as with social workers.
- To ensure effective communication, promote the employment of ethnic minorities in the above-mentioned institutions;
- Provide access to at least the most important information in national minority languages on the websites of MoIDPLHSA, and of its LELPs, the LELP Social Service Agency and LELP State Care Agency;
- Sort statistical data on PwDs according to ethnicity and provide its public accessibility;
- Ensure ethnic minority PwD inclusion and their effective participation in central-government level mechanisms, which should lead to changes in PwD policies according to their needs and future perspectives of this group;
- Prior to the transfer to the social model of disability status assignment, with tight coordination with municipalities, ensure geographic accessibility of medical institutions for the persons seeking disability status assignment or modifications in their disability status with the following means: 1. Creating such institutions in respective municipalities 2. Providing free transportation to other municipalities or 3. free transportation from various municipal territories to the municipal centres.
- Ensure multiplication of state social rehabilitation and child care programs, especially of daycare centres and early development subprograms in every municipality, as well as their functioning in the languages accessible to the local population. Prior to this, with tight coordination with municipalities, ensure the geographic accessibility of services for PwDs by the following means: 1. free transportation

to other municipalities or 2. free transportation from various municipal territories to the municipal centres (up to the services).

- Strengthen the implementation of the employment promotion mechanisms and proactive inclusion of ethnic minority PwDs in them;
- Create special training programs for specialists working on PwD and ethnic minority rights and their challenges, as well as periodic and systemic training of primary healthcare specialists from the disability status assigning medical institutions, social workers, and respective MoIDPLHSA representatives.