

Organisation: European Federation of Hard of Hearing People (EFHOH)

Contribution to the Draft General Comment on Participation in Political and Public Life (Article 29)

Overall assessment

EFHOH welcomes the development of the draft General Comment on Participation in Political and Public Life (Article 29) and its comprehensive recognition of accessibility, reasonable accommodation and the active involvement of persons with disabilities in political and public life. The recommendations below focus on ensuring that communication accessibility reflects the diversity of persons with hearing disabilities.

Persons with hearing disabilities are not a homogeneous group. Deaf sign language users, hard of hearing persons and deafblind persons may have different linguistic identities, communication preferences and accessibility requirements. Many hard of hearing persons communicate primarily through spoken language and have hearing disabilities that are not immediately visible. Depending on the individual, effective participation may require real-time captioning, hearing loops or other assistive listening systems, written information, or a combination of supports. Sign language interpretation is essential for sign language users, but it does not meet the communication requirements of many hard of hearing people who do not use sign language.

1. Intersectional barriers affecting persons with hearing disabilities

Location: *Section I, Introduction, paragraph 5.*

Proposed action: Add the following sentences at the end of paragraph 5.

Within disability groups, exclusion may also arise from differences in disability identity, visibility and communication requirements. Persons with hearing disabilities may experience intersectional barriers to political and public participation that are further aggravated by the often invisible nature of hearing loss, which can result in disbelief, failure to recognise communication requirements and denial of reasonable accommodation. For example, older hard of hearing persons, women with hearing disabilities and persons communicating in a language that is not their first language may face compounded difficulties in following political debates, participating in consultations, accessing electoral information or engaging in decision-making processes. States parties should therefore ensure that accessibility measures respond to the diversity of hearing disabilities and individual communication requirements.

2. Accessibility of electoral information and communication



Location: *Section IV.A(b), Accessibility of voting procedures, facilities and materials, paragraph 19.*

Proposed action: Add the following sentence at the end of paragraph 19.

For persons with hearing loss, electoral information, political debates and public communications should not be limited to a single communication modality. They should be made available through the communication modalities required by the individual, including, as appropriate, real-time captioning, hearing loops and other assistive listening systems, written information and accessible digital communication.

3. Non-compliance caused by audio-only or single-modality communication

Location: *Section IV.A(b), paragraph 21.*

Proposed action: Insert the following sentence after the reference to the dissemination of pre-electoral and campaign information in formats that do not conform to recognised accessibility requirements.

Non-compliance also arises where electoral information, political debates or campaign communications are provided only in audible form, or where a single communication modality is treated as sufficient for all persons with hearing disabilities.

5. Binding standards for communication support across the electoral cycle

Location: *Section IV.A(b), paragraph 22.*

Proposed action: Add the following sentence after the first sentence, which requires comprehensive and binding accessibility standards for all components of the electoral process.

Such standards should require the availability of communication supports suited to individual requirements, including real-time captioning assistive listening systems, and written information.

4. Effective performance of public functions

Location: *Section IV.A(c), Secrecy of the ballot and effective exercise of public functions, paragraph 25.*

Proposed action: Add the following sentence after the reference to inaccessible communication systems and assistive technologies.

For candidates and office-holders with hearing loss, effective participation may require captioned proceedings, hearing loops or other assistive listening systems, and written documentation.

5. Accessible participation in public affairs

Location: Section IV.A(e), *Full and effective participation in the conduct of public affairs, paragraph 33.*

Proposed action: Add the following sentence after the sentence describing inaccessible procedures, information and denial of reasonable accommodation.

For persons with hearing loss, such barriers may arise where meetings rely solely on spoken communication without captioning or assistive listening systems. Given the diversity of hearing loss, language use and communication preferences, a range of communication options should be available, including real-time captioning, hearing loops or other assistive listening systems, and written information, in accordance with individual requirements and preferences.

6. Communication modalities in consultation and decision-making

Location: Section V, *Obligations of States parties, paragraph 45.*

Proposed action: Replace the phrase “the provision of appropriate communication modalities, including sign language interpretation, captioning and easy-to-understand formats” with the following text.

the provision of appropriate communication modalities, including sign language interpretation for sign language users, real-time captioning, hearing loops or other assistive listening systems, written and easy-to-understand formats, and other supports selected according to individual communication requirements.

7. Digital participation and automated communication tools

Location: Section V, *Obligations of States parties, paragraph 46.*

Proposed action: Add the following sentences at the end of paragraph 46.

For persons with hearing loss, digital participation systems should support real-time captioning, compatibility with assistive listening and hearing technologies, and alternatives to audio-only content. Where automated captioning or other artificial intelligence systems are used, their accuracy should be assessed with users and human-supported alternatives should be available where effective communication is essential.

8. Intersectional barriers affecting women with hearing disabilities



Location: *Section VI, Relationship with other provisions of the Convention, paragraph 52.*

Proposed action: Add the following sentences at the end of paragraph 52.

Women with hearing disabilities may face additional gender-specific and intersectional barriers where hearing loss is not immediately apparent, including disbelief regarding their accommodation requirements, gendered assumptions about competence or communication, and exclusion from political meetings and leadership opportunities when appropriate communication support is not provided.

9. Accessible political and public information

Location: *Section VI, Relationship with article 21, paragraph 57.*

Proposed action: Add the following sentence at the end of paragraph 57.

For persons with hearing loss, appropriate formats and inclusive communication channels may include real-time captioning and written information. At high-level public and political events, assistive listening systems should be available and live captioning should be provided by professional human services to ensure the highest possible level of accuracy, reliability and completeness, particularly where discussions involve complex, technical or rapidly delivered content.

10. Disability-related costs of political participation

Location: *Section VII(c), Structural accessibility and systemic safeguards, paragraph 65.*

Proposed action: Replace the existing list beginning “including those linked to personal assistance” with the following wording.

including those linked to personal assistance, accessible transport, sign language interpretation, real-time captioning, hearing loops or other assistive listening systems, written information formats and assistive technologies required for campaigning or office-holding.

11. Disaggregated data on political participation

Location: *Section VII(d), Monitoring, data and accountability, paragraph 67.*

Proposed action: Add the following sentence at the end of paragraph 67.

Data concerning persons with hearing disabilities should, where appropriate and with respect for self-identification, distinguish Deaf, hard of hearing and deafblind persons

and capture relevant communication requirements, since aggregation may conceal significant differences in barriers to participation and access to accommodation.

12. Accessible communication during emergencies

Location: Section VII(e), Multilevel and crisis-responsive implementation, paragraph 69.

Proposed action: Add the following sentence after the reference to inclusive communication strategies.

Emergency and contingency arrangements should ensure that warnings, voting information, consultation notices and public communications are not delivered only through audible means, but are also available through text, visual alerts, real-time captioning, digital notifications and assistive listening technologies.

About EFHOH

The European Federation of Hard of Hearing People (EFHOH), established in 1993, is a non-profit organization representing hard of hearing and late-deafened individuals across Europe. EFHOH advocates for awareness and practical actions to eliminate barriers to access affordable hearing care and rehabilitation and create an accessible society through public services and assistive technologies. Its main objective is to protect and promote the rights of individuals with hearing loss in Europe.