

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

Contribution to the Draft Guidelines on Disability-Based Violence

Overall assessment

EFHOH welcomes the Draft Guidelines' recognition of the broad continuum of disability-based violence and of the heightened and gender-specific risks faced by women and girls with disabilities. The recommendations below address barriers affecting persons with hearing disabilities generally, while giving particular attention to hard of hearing women and girls where the relevant provision concerns gender-based violence, intimate partner violence, coercive control or intersectional discrimination.

Hearing disabilities are often not immediately visible, particularly among hard of hearing women. This invisibility, combined with communication barriers, can increase exposure to violence and prevent effective reporting, protection and access to justice. Persons with hearing disabilities are not a homogeneous group and may require different forms of communication support. Sign language interpretation is essential for sign language users, while many hard of hearing persons who communicate primarily through spoken language may instead require real-time captioning, hearing loops or other assistive listening systems, and written communication. For women and girls, these barriers may intersect with gender inequality and facilitate distinct forms of coercive control, disbelief and exclusion.

1. Hearing loss-related forms of disability-based violence

Location: *Section III.A, Conceptualization and causes, paragraph 16.*

Proposed action: Add the following sentence at the end of paragraph 16.

For persons with hearing disabilities, disability-based violence may also involve hiding, damaging or withholding hearing aids, cochlear implant processors or other assistive devices; controlling access to telephones, messaging or communication applications; deliberately withholding information; or refusing communication accommodations in order to isolate, control or discredit the person.

2. Disbelief and dismissal of hard of hearing women

Location: *Section III.A, Conceptualization and causes, paragraph 18.*

Proposed action: Add the following sentence at the end of paragraph 18.

For hard of hearing women and girls, whose hearing disabilities are often not immediately visible, communication barriers may contribute to disbelief or dismissal by

police, prosecutors and courts, including where missed or misunderstood information is wrongly interpreted as inconsistency or lack of cooperation.

3. Accessible information on protection and reporting

Location: Section IV, Gaps in realizing the right to be free from disability-based violence, paragraph 32(I).

Proposed action: Replace subparagraph 32(I) with the following text.

Limited or non-existing access to information for persons with disabilities about protection against all forms of disability-based violence, including the absence of information and reporting channels in accessible communication formats responsive to individual requirements, such as real-time captioning and text-based communication;

4. Hearing loss-based coercive control by intimate partners

Location: Section V.C, Spousal abuse/intimate partner violence, paragraph 48.

Proposed action: Add the following sentence at the end of paragraph 48.

Intimate partners may also exploit the communication barriers experienced by hard of hearing women by hiding or damaging hearing devices, controlling access to communication technologies, withholding information, cancelling communication support or refusing accommodations, thereby increasing isolation and dependency.

5. Example concerning a hard of hearing woman in education

Location: Section V.H, Violence in non-residential school settings, paragraph 62(c).

Proposed action: Replace the existing example in paragraph 62(c) with the following wording.

A hard of hearing woman reported that a teacher failed to provide the communication support she required during an examination and made dismissive remarks concerning her hearing disability and age;

6. Communication barriers and police use of force

Location: Section V.L, Violence in justice and policing, paragraph 70.

Proposed action: Add the following sentences after the first sentence of paragraph 70.

This may occur, for example, when a hard of hearing person does not hear or understand an instruction and this is misinterpreted as deliberate non-compliance,

aggression or disrespect. Law-enforcement communication should be made accessible through appropriate supports, including real-time captioning, available assistive listening systems and written information.

7. Accessible communication in reporting and justice procedures

Location: *Section V.L, Violence in justice and policing, paragraph 75.*

Proposed action: Add the following sentences at the end of paragraph 75.

Police, prosecutors and courts should ensure communication support based on the individual's requirements. Sign language interpretation is essential for sign language users. Hard of hearing women may instead require real-time captioning, hearing loops or assistive listening systems, and written information.

8. Hearing accessibility and informed consent in healthcare

Location: *Section V.M, Violence and abuse in health care services and settings, paragraphs 77–78.*

Proposed action: Add the following sentences at the end of paragraph 77.

Add to paragraph 77: "Communication in healthcare settings should be accessible to persons with hearing disabilities through the accommodation required by the individual, including real-time captioning, hearing loops or other assistive listening systems, and written information. Failure to ensure effective communication can undermine informed consent and access to protection and remedies."

9. Accessible warnings and evacuation information

Location: *Section V.O, Emergency and conflict settings, paragraph 96.*

Proposed action: Add the following sentences after the first sentence of paragraph 96.

For persons with hearing loss, audible-only warnings, evacuation announcements and shelter instructions may be inaccessible and expose them to heightened risk. Emergency information should therefore be provided simultaneously through visual and text-based alerts, captioning, digital notifications and use of assistive listening technologies.

10. Forms of aggravated violence against women and girls with hearing loss

Location: *Section VI, Aggravated forms of disability-based violence, paragraph 99(c).*

Proposed action: Add the following sentence at the end of subparagraph 99(c).



For hard of hearing women and girls, such violence may also take the form of communication-based coercive control, including withholding information, hiding or damaging hearing devices, controlling access to communication technologies and deliberately refusing required accommodations.

11. Accessible survivor support and training of safety personnel

Location: Section VIII.B, Recommendations, paragraph 121(g)–(h).

Proposed action: Replace subparagraphs 121(g) and 121(h) with the following wording.

(g) Ensure gender- and age-responsive support and information for survivors in communication formats responsive to individual requirements, including sign language, real-time captioning, text-based communication, assistive listening systems, accessible digital services and written information, including for persons in institutions;

(h) Ensure training for police and other safety personnel so that they exercise public safety roles in a manner that respects and destigmatizes persons with disabilities, including persons with intellectual and/or psychosocial disabilities and persons with hearing disabilities, and that they understand the diversity of communication requirements and provide the accommodation needed by each person.

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.