

Netherlands Institute for Human Rights

Written submission

to the 78th session of the Committee on Economic, Social and Cultural Rights (CESCR) for the consideration of the seventh periodic report of the Netherlands

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Introduction

1. With this written submission, the Netherlands Institute for Human Rights (the Institute) provides the Committee on Economic, Social and Cultural Rights (the Committee) with information for its consideration of the seventh periodic report of the Netherlands.
2. The Institute was established as the National Human Rights Institution of the Netherlands in 2012 and has been accredited with A-status since May 2014. The Institute protects, monitors, explains and promotes human rights in the Netherlands through research, advice and awareness raising. Its mandate also covers urging the Government to ratify, implement and observe human rights treaties. Furthermore, the Institute is the national independent monitoring body under article 33(3) of the Convention on the Rights of Persons with Disabilities (CRPD) and the National Prevention Mechanism (NPM) under the Optional Protocol to the Convention against Torture. The Institute is also the national equal treatment body of the Netherlands. As such, it can make (non-binding) decisions on complaints of discrimination. The Institute's mandate includes the European part of the Netherlands as well as the three islands, Bonaire, Saba and St. Eustatius of the Caribbean Netherlands (Caribbean Netherlands). Since 2010, these three islands are special municipalities of the Netherlands.
3. In June 2025 the Government collapsed. When the Institute refers to 'the Government' in this written submission, it is referring to the current 'care taker cabinet'.
4. The common thread in this written submission is – similar to the Institute's written submission to the pre-sessional working group – the minimal progress and in some cases (significant) retrogression of the protection of Covenant rights. The Netherlands has been facing serious problems with respect to the right to an adequate standard of living, access to affordable housing, health care and education. The current Government, that took office in July 2024, expressed its ambitions to solve these problems. The Institute observes that some positive steps have been taken, such as the plan to combat poverty. Nevertheless, economic and social rights continue to be under pressure, with groups in vulnerable positions experiencing little to no improvements. A serious point of concern, is that the Government does not guarantee equal rights for all. For example, suggesting that restricting the rights of asylum seekers is necessary to guarantee economic and social rights for others, has led to a weakened position of asylum seekers and a failure to protect their basic rights. Also other groups face serious problems, such as homeless persons, Travellers in the protection of their cultural identity, persons with disabilities at the labour market and in education, migrant workers in the protection of their labour rights, young people seeking access to housing and victims of domestic violence seeking access to shelter. The unequal protection of Covenant rights in the Caribbean Netherlands, specifically on social security and environmental issues, also remains concerning. The Institute notes that the protection of the rights laid down in the Covenant should be improved by legislation, policy measures and by ensuring effective remedies. It continues to be difficult to challenge the alleged violation of economic and social rights before a court. Again, the Institute draws the Committee's attention to the Government's position that economic and social rights are not well fit for judicial review. The current initiatives concerning constitutional review reaffirm this concern.
5. In its submission, the Institute does not address all Covenant provisions. That does not imply that the Institute considers other issues less important. Many of the issues addressed in the Institute's present report are addressed in the Committee's List of Issues. The Government's responses addresses the concerns of the Institute to an extent, but the Institute notes that many are still outstanding. The Institute resubmits its report to the pre-sessional working group since most issues are relevant for the dialogue.

Article 2: effective implementation of the Covenant

Constitutional review and ratification of the Optional Protocol to the Covenant (*List of Issues par. 2-3, State reply to par. 2-3, Institute's written submission to PSWG par. 1-2*)

6. The discussion on the justiciability of the social rights laid down in the Dutch Constitution, and international human rights instruments, is very topical. The Government is taking steps to amend the Constitution, in order to partially lift the ban on constitutional review of Acts of Parliament by the judiciary.¹ However, the Government proposes constitutional review of civil and political rights only. At the same time, the judiciary remains hesitant to accord direct effect to the rights laid down in the Covenant, making it very difficult for individuals to challenge alleged violations of these rights before a court. The Government takes the position that economic and social rights are not sufficiently precise and formulated as government obligations, which cannot be invoked by individuals in judicial proceedings.² As a consequence, the justiciability of economic and social rights remains a subject of

concern to the Institute. The Institute has repeatedly called on the Government and Parliament to guarantee the justiciability of those economic and social rights, which vest individuals with directly invocable rights.³ In May 2024, the Government decided not to take steps to ratify the Optional Protocol to the Covenant. It argues that the (financial) consequences are unpredictable, the scope of the Covenant is broad, and the number of ratifications is low.⁴

Suggestion for a question:

What steps will the Government take to strengthen the justiciability of economic, social and cultural rights?

Economic and social rights of asylum seekers under threat

7. In its Government programme presented on 13 September 2024, the Government announced its intention to put into place 'the most restrictive asylum policy ever'. This resulted in two proposed asylum bills: the Asylum Emergency Measures Act (*Asielnoodmaatregelenwet*) and the Act introducing a dual status system (*Wet invoering tweestatusstelling*). In the Government programme and the explanatory memoranda to the draft bills, the number of people that sought asylum in the Netherlands in recent years, and may do so in the future, was cast as a primary cause of problems related to access to health care, education and housing.⁵ This governmental policy has fed into a stigmatising discourse that has become dominant in both the political and the societal arena. It paved the way for two far-reaching amendments to the proposed laws adopted by the House of Representatives in July 2025. The amendments make irregular stay a punishable felony (see par. 9) and forbid municipalities to give priority to people with a refugee status when assigning social rental housing (see par. 37). The draft bills are pending before the Senate.
8. As discussed in paragraphs 30-32, 37-40 and 43-45, the Netherlands faces serious problems in the areas of access to health care, education and housing. The Institute is concerned about the suggestion that restrictions of the rights of asylum seekers and persons who have received asylum status is necessary for the realisation of economic, social and cultural rights of others. According to the Institute, these restrictions of the rights of this vulnerable group are not in conformity with the Government's obligations under the Covenant.

Suggestions for questions:

- *Please update the Committee on the status of the draft bills on asylum.*
- *Can the Government clarify how it justifies the restrictions of the rights of people seeking asylum, the rights of people who have received asylum and the rights of people without legal residency, in light of its obligations under the Covenant?*

Criminalisation of irregular stay

9. The above mentioned amendment to the Asylum Emergency Measures Act criminalises irregular residency. Complicity, that includes providing humanitarian support to those residing illegally, will also constitute a punishable act. The exact scope and consequences of the amendment are unclear. The draft bill is pending before the Senate. The Institute is concerned that the criminalisation of irregular stay will be detrimental to the social and economic rights of persons without legal residency, such as the right to medically necessary healthcare and the right to education, and is not in conformity with the Covenant. The Institute urges the Government to retract this amendment.

Suggestion for a question:

What measures will the Government take to comply with its obligations under the Covenant with respect to persons without legal residency if irregular stay would be criminalised?

Meaningful participation

10. Meaningful participation is not adequately embedded in existing working processes of both central and local government. As a result, during policy making, implementation, monitoring and evaluation of policy, rightsholders are – in many cases – insufficiently or not at all involved. Some examples of good practices exist. For example, the National Action Plan on Homelessness⁶ was co-created with rightsholders and their representatives, leading to a plan that focuses on the right issues and solutions. However, lack of meaningful participation all too often leads to policy measures which do not meet the needs of rightsholders or may have adverse effects on certain groups.

11. Since January 2025, local governments are obliged to establish a 'participation ordinance' (*participatieverordening*), setting out how participation within their policy cycles will be organised.⁷ Since it is at the discretion of local governments to shape the ordinance, they are in a position to take into account local circumstances. To guarantee meaningful participation for all persons affected by policy, the Institute considers it important that the central government monitors the effectiveness of the measures taken.

Suggestion for a question:

What concrete steps will the Government take to make sure that meaningful participation is sufficiently imbedded in working processes throughout central and local government?

Climate change, environment and human rights (*List of Issues par. 7, State reply to par. 7(a-d), Institute's written submission to PSWG par. 39-40*)

12. While acknowledging the Government's efforts in the adoption of climate targets and environmental frameworks, the Institute observes that a structural, human rights-based approach remains largely absent.⁸ As a consequence, human rights considerations are not systematically integrated in policy. Official reports and Government statements indicate that the Netherlands is not on track to meet key climate and environmental goals.⁹ Even though the Government acknowledges that further measures may be needed, recently adopted measures include the postponement or softening of climate measures. These include the extension of indirect compensation schemes for energy-intensive industries and adjustments to the CO₂ levy.¹⁰ Such measures increase the risk of non-compliance with rights enshrined in the Covenant, including the rights to health, adequate housing and food, particularly for those in disadvantaged and marginalised positions.

13. These concerns are especially acute in the Caribbean Netherlands. While the Government acknowledges the region's heightened vulnerability, progress in establishing updated and rights-based climate and environmental frameworks remains slow. Island-specific climate plans are still under development¹¹ and do not yet provide legal certainty or protection equal to that of the European Netherlands. Additionally, broader environmental challenges persist, such as the long-standing waste management problems on Bonaire.

Suggestions for questions:

- *How does the Government assess whether its environmental and climate measures adequately protect the rights of those most at risk, and ensure a fair and equitable distribution of burdens and benefits?*
- *What steps is the Government taking to structurally integrate a human-rights based approach across the full cycle of environmental and climate policy making?*
- *How will the Government ensure equal and adequate protection of environmental rights in the Caribbean Netherlands, both in law and practice?*

Business and human rights (*List of Issues par. 6a-6b, State reply to par. 6a-6b, Institute's written submission to PSWG par. 40*)

14. On 25 July 2024, the EU Corporate Sustainability Due Diligence Directive (CSDDD) entered into force. At the outset, the Government expeditiously took steps to draft the bill transposing this directive into national law. However, due to a proposal of the European Commission (Omnibus I proposal) to amend and simplify the CSDDD,¹² this process was halted. On 23 June 2025, the Council of the European Union agreed on a position regarding the Omnibus proposal, which further erodes the original directive.

15. The position of the Government within the Council was not very ambitious.¹³ The Government stated that in addition to legislation like the CSDDD, it will continue to work with a 'smart mix of instruments' to ensure that Dutch companies apply due diligence in line with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). The Institute is concerned this will result in the misalignment of the CSDDD with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines. For example, under the CSDDD, companies are only obliged to conduct due diligence under its direct suppliers, whereas the UNGPs call for a risk-based approach that also includes indirect suppliers.¹⁴

Suggestion for a question:

How is the Government going to ensure compliance with Covenant rights, the OECD guidelines and the UNGPs?

Article 6 and 7: the right to work and the right to just and favourable conditions of work

Discrimination on the labour market (*List of issues par. 14c, 15, State reply to par. 14c, 15, Institute's written submission to PSWG par. 5, 8-9*)

16. Discrimination on the Dutch labour market continues to be a structural problem, despite legislative and policy measures. Research shows that in 2023, 3 percent of all persons above the age of 15 experienced discrimination at work.¹⁵ In 2024, the Senate rejected a legislative proposal strengthening supervision of recruitment procedures. Subsequently, the Government introduced a policy plan that aims to increase equal opportunities (*Offensief Gelijke Kansen*).¹⁶ However, the Institute is concerned that this new plan will not sufficiently contribute to reducing labour market discrimination. It is specifically concerned about gender-related discrimination on the labour market, notably pregnancy discrimination and equal pay for women and men. A study by the Institute (2020) shows that pregnancy discrimination has not decreased since 2012.¹⁷ In 2024, more than 25 percent of the reports and almost half of the Institute's opinions under the Equal Treatment Act on labour market discrimination concerned pregnancy issues.¹⁸ The Institute is concerned that Government efforts to reduce pregnancy discrimination have, so far, been unsuccessful. As for equal pay, figures show that the gender pay gap narrowed in 2024: from 13 percent less per hour in 2021, to 10,5 percent in 2024.¹⁹ To accelerate this trend, structural measures such as increased pay transparency, strengthened legal protection and effective enforcement, are crucial. The recently adopted EU Pay Transparency Directive provides a valuable framework for implementing such measures. Additional action, including addressing social norms and gender stereotypes, is needed to fully eliminate the gender pay gap.

Suggestion for a question:

What additional measures will the Government take to structurally reduce the existing levels of labour market discrimination, especially regarding pregnancy discrimination and equal pay?

Employment of persons with disabilities (*List of Issues par. 15, State reply to par. 15, Institute's written submission to PSWG par. 7, 14-15*)

17. People with disabilities experience several barriers to finding and keeping employment, and advancement within work. Research shows that the employment rate of people with disabilities is low on average. In 2023, only 46 percent of people with physical disabilities and 14 percent of people with intellectual disabilities had a paid job, compared to 86 percent of the general labour force.²⁰
18. Those in paid employment are more likely to have relatively shorter and flexible employment contracts compared to people without disabilities.²¹ Laws and regulations aimed at facilitating participation at the labour market are very complex and insufficiently accessible.²² Earning a wage from labour has consequences for obtaining social benefits, for some this results in an income that is lower than solely living off benefits. Moreover, misguided expectations from employers as well as people with disabilities themselves play a role. Employers at times underestimate the potential of people with disabilities and are not adequately informed about support they can receive. Some people with disabilities experience that their capabilities are underestimated.²³ Others, however, experience that too much is expected because employers do not know how the disability affects work. This is in particular the case for people whose disability is invisible. The Government should address these issues.
19. In its submission of 2023, the Institute expressed concerns that the goal of creating 125.000 extra jobs for persons with disabilities by the beginning of 2026, would not be met. Although there are several recent legislative reforms and policy initiatives to improve this situation, it is not yet clear what impact these will have in practice; a comprehensive impact analysis is currently still lacking. Therefore, it is not yet possible to assess whether the measures will sufficiently address existing barriers.

Suggestion for a question:

How do ongoing legislative and policy initiatives contribute to a structural improvement in the labour participation of people with disabilities?

Flexible employment (*List of Issues par. 16, State reply to par. 16*)

20. The Dutch labour market is characterised by far-reaching flexibilisation. Around 40% of all employed people can be considered as working in flexible employment (flexwork) or are self-employed without personnel.²⁴ While this works fine for many of them, a significant number of people working in flexible employment are more at risk of ending up in poverty than people who have a permanent contract.²⁵ In 2023, approximately 216.000 people lived in poverty despite their income from work.²⁶ Those people mostly work on-call or without fixed hours, with a low number of weekly hours, or are self-employed:

often part-time or irregularly.²⁷ In particular, (EU-)migrant workers often have flexible employment contracts, making their income and livelihoods vulnerable, not to mention their pension rights.²⁸

21. The Government is taking measures to address the problems of working people living in poverty. It has drafted a bill that aims to give workers with flexible employment contracts more security in their work and income.²⁹ In addition, the bill aims to provide greater clarity about working hours and schedules, and to give flexible workers better prospects for permanent contracts. However, the Council of State is very critical about the bill and its effectiveness.³⁰ It concluded that the proposed measures will have only limited effects, because they do not fundamentally reform the labour market. The Council of State observed that the bill insufficiently took into account the broader problems that exist at the labour market. The Institute shares these concerns.

Suggestion for a question:

What measures will the Government take to address the fundamental and broad problems in relation to flexible employment?

Article 9: the right to social security

Adequacy of and access to the social security system (*List of Issues par. 21, State reply to par. 21, Institute's written submission to PSWG par. 11-13*)

22. The Government takes measures to improve and simplify the system of social security, with the aim of reducing the non-use of certain income support schemes. The aim is to improve the accessibility and clarity of measures that combat poverty.³¹ Measures are taken to provide for better cooperation by the various organs involved, for example by the SUWI Act. The Institute welcomes these steps. At the same time, it stresses the need to guarantee that the social security system is adequate and accessible also for groups in a vulnerable position. The Institute stresses that specific attention should be paid to, among other matters, the specific needs of persons with a non-western migration background or a refugee-history, migrant workers and people with a disability.
23. In 2023, an independent committee (*Commissie Sociaal Minimum*) concluded that the current poverty threshold (social minimum) is not sufficient to support people living in poverty. It requires adjustments to cover the cost of basic needs and to allow for the creation of a financial buffer. The Institute is very concerned that the Government has not followed up on this recommendation which is essential to structurally combat poverty.³²

Suggestion for questions:

- *How will the Government ensure that its social security policy is accessible and clear for groups in vulnerable positions?*
- *Which steps will the Government take to guarantee that the social minimum is adequate to ensure an adequate standard of living?*

Access to social security in the Caribbean Netherlands (*List of Issues par. 5, 21, State reply to par. 5, 21, Institute's written submission to PSWG par. 22-23*)

24. Key social security measures available in the European Netherlands, such as the child-related budget and unemployment benefits, are not accessible in the Caribbean Netherlands. This also applies for the unemployment benefits specifically fitting the needs of disabled people where a significantly different system applies in the Caribbean Netherlands.³³ This absence limits the support available to low-income families and individuals who lose their jobs, deepening their financial vulnerability. The lack of these targeted benefits contributes to persistent poverty and highlights structural inequalities between the European and Caribbean Netherlands.

Suggestion for a question:

What steps is the Government taking to guarantee adequate access to social security measures in the Caribbean Netherlands and to address the structural disparities in social security provisions between European and Caribbean Netherlands?

Social security of persons with disabilities (*List of Issues par. 21, State reply to par. 21, Institute's written submission to the PSWG par. 14-15*)

25. Shortcomings persist regarding accessibility of the social security system for persons with disabilities.³⁴ The Government pointed to the goal of current reforms to promote the accessibility and clarity of the social security system and to prevent legal uncertainty. The Institute observes, however, that it is not

clear how these initiatives could contribute to the accessibility of the social security system. A comprehensive impact analysis is not available. Moreover, issues such as the cost-sharing standard (*kostendelersnorm*), which was discussed in the Institute's 2023 written submission, still persist, negatively impacting the financial independence of persons with disabilities. A legislative initiative to abolish the cost-sharing standard did not pass in 2024. The Institute's concerns on this issue remain.

Suggestion for a question:

Which concrete steps does the Government take to ensure that barriers to the social security system that persons with disabilities experience are lifted?

Article 10: protection of the family and children

Gender-based violence and domestic violence (*List of Issues par. 22, State reply to par. 22, Institute's written submission to PSWG par. 4*)

26. The Government has taken some important steps to combat gender-based violence and domestic violence. There is a variety of action plans, agendas and other initiatives. Unfortunately, there is no comprehensive action plan that covers all forms of gender-based violence and domestic violence.³⁵ Different forms of violence are covered by different policy documents, without proper coordination: the different plans fall under the responsibility of different government departments and do not (explicitly) explain the links to other relevant documents. Some forms of violence, including economic violence and the digital dimension of violence, are not covered by any of the documents. The Institute has urged the Government to draft a comprehensive action plan and strengthen national coordination.
27. Both CEDAW and GREVIO recommended the Government to improve systematic collection of statistical data.³⁶ However, these recommended improvements have not been materialised yet. The Institute found that this is mainly due to two reasons.³⁷ First, authorities use one overarching definition when registering reports of gender-based and domestic violence, which makes it difficult to differentiate between different types of violence. Second, there is no central reporting service that registers all reports of gender-based and domestic violence. The domestic abuse advice and reporting centre (*Veilig Thuis*) receives the majority of the reports, but the information it registers is too limited.

Suggestion for a question:

What steps does the Government towards a comprehensive action plan and national coordination along with sufficient data collection in order to meet its obligations under the Covenant, CEDAW and the Istanbul Convention?

Article 11: the right to an adequate standard of living

Anti-poverty policies (*List of Issues par. 24, State reply to par. 24, Institute's written submission to PSWG par. 20-21*)

28. Data about poverty show that approximately 1.7 million people in the Netherlands are struggling financially, 540.000 of whom live below the poverty line.³⁸ The Institute appreciates the Government's increased attention for this issue in the 2025 plan on poverty and debts.³⁹ However, it also notes some issues of concern. For example, the plan sets a target to not allow (child)poverty to rise above the reference year of 2024.⁴⁰ The Institute considers this ambition not to be in conformity with the duty to progressively realise the rights laid down in the Covenant. Furthermore, this plan focuses on debt counselling, child poverty and employed people living in poverty. Other relevant aspects such as housing, healthcare and education are referred to in the plan, but are to be further elaborated by different ministries. According to the Institute, a more holistic approach of the relationship between poverty and human rights is needed. Furthermore, the Institute is concerned about the lack of attention for needs of groups in vulnerable positions: for instance people with a non-western migration background or a refugee history, single parents and people with disabilities.
29. The plan on poverty and debts does not contain comprehensive and structural interventions to combat poverty. Such measures are indispensable, since the temporary or local schemes are often inadequate. First, these schemes fail to reach every person in need of help. Specifically, people in the most vulnerable positions are left behind. For example, the Government opened an one-off energy allowance to alleviate high costs (*Tijdelijk Noodfonds Energie*). However, there were insufficient funds to support all people who were eligible for support.⁴¹ Second, varying local poverty schemes create large variance between municipalities. As a result, differences between similar households can go up to €200, depending on the place of residence.⁴² These inconsistencies and uneven protection and support for people in poverty can lead to an infringement of their rights under the Covenant. Finally, the Government

has announced budget cuts that will strongly impact municipalities. For instance, structural resources for early debt detection will cease to exist per 2029.⁴³ The Netherlands Institute for Social Research (SCP) has warned that these budget cuts will reduce the wellbeing of people.⁴⁴

Suggestions for questions:

- *How will the Government integrate a (holistic) human rights perspective into its anti-poverty policy and ensure that its anti-poverty policy is structural?*
- *Can the Government explain the steps that it is going to take to actually reduce (child) poverty and thereby meet the obligations of the Covenant?*

Housing and homelessness (*List of Issues par. 25, State reply to par. 25, Institute's written submission to PSWG par. 24-30*)

30. A severe shortage of all types of housing in the Netherlands continues to exist. This affects especially younger people, elderly people in need of care and people with disabilities. Due to high costs, most of the younger people can neither afford to buy nor to rent a house. The Institute welcomes the Government's initiatives to bring the housing stock up to standard. It is, however, concerned that the number of newly built housing lags substantially behind demand. Furthermore, the Institute is concerned that the effects of housing policy on groups who are in the most vulnerable positions, such as homeless persons, EU migrant workers and persons with a refugee status (also see par. 37) are not properly taken into account.
31. Moreover, homelessness continues to be a problem. A recent survey shows that more people are homeless than government statistics show.⁴⁵ The survey also shows that EU migrant workers constitute a significant part of those sleeping on the streets. The Institute is especially concerned about the situation of persons who are (at risk of becoming) homeless. Only homeless persons with mental health issues and/or addiction have access to shelters for the homeless. Persons who are considered to be capable to take care of themselves do not have access to homeless shelters, even though they are in fact homeless based on the ETHOS Light-definition. They have to seek shelter in their cars, holiday housing, stay with friends or next of kin or live on the streets, without much prospect on finding their own (affordable and suitable) home. The Institute is concerned that the extreme vulnerable situation of this group is not being considered by the Government and that it does not take enough measures to ensure their right to adequate housing.
32. Municipalities play a central role in the implementation of the National Action Plan on Homelessness. In doing so, they enjoy a margin of discretion. A study found that many municipalities do not take sufficient action to prevent homelessness and do not take enough steps to guarantee access to housing for homeless persons, despite the Action Plan's focus on 'housing first' and promising plans.⁴⁶ The Institute considers that the Government should see to it that municipalities take steps to implement the Action Plan in its entirety.

Suggestions for questions:

- *What steps will the Government take to ensure that housing policies do not adversely affect people in the most vulnerable positions, specifically homeless people?*
- *What steps will the Government take to make sure that municipalities, when implementing the National Action Plan on Homelessness, focus on preventing homelessness and 'housing first'?*

Poverty and housing issues in the Caribbean Netherlands (*List of Issues par. 24-25, State reply to par 24-25 Institute's written submission to PSWG par. 22-23*)

33. High levels of poverty remain a significant issue in the Caribbean Netherlands. Households face elevated expenses across essential areas such as food, utilities (including energy, water and internet), housing, accessible public transportation and quality education. To address this issue, the Government introduced an official minimum income threshold in 2024.⁴⁷ This threshold was informed by the findings of the independent, Minimum Income Standard Committee for the Caribbean Netherlands.⁴⁸ As a result, the minimum wage is now adjusted to align with this benchmark, leading to increases in minimum wage in July 2024.⁴⁹ Despite these policy improvements, a guaranteed decent standard of living for all residents of the Caribbean Netherlands has yet to be realized.
34. Another contributing factor to persistent poverty in the Caribbean Netherlands is the ongoing lack of access to affordable housing and a shortage of social housing. People with low incomes have to resort to the private housing sector, thus facing high housing costs. As a result, the overall housing expenses

further exacerbates financial strain on vulnerable groups. While some positive steps have been taken to expand social housing, more efforts are required to achieve concrete results.

35. Access to affordable housing is further hindered by the limited reach and practical challenges of social benefits. Rental subsidy is only available to social housing tenants and often difficult to access in practice. A pilot project on Bonaire aimed at extending rental support to low-income households in the private sector ended in 2024 and has been extended as a pilot program.⁵⁰ Such a project is not yet available on Saba and St. Eustatius. No structural rental support exists for private sector tenants on any of the islands. Given the persistent shortage of social housing and the growing number of low-income households in the private rental market, the Institute underscores the urgent need to expand and improve housing support, including making rental subsidies accessible to those outside the social housing system.
36. Legal safeguards available in the European Netherlands – such as strong tenancy laws and access to rent assessment committees – are lacking in the Caribbean Netherlands. St. Eustatius and Saba, for example, do not have rental committees, leaving tenants without an accessible mechanism to contest unfair rents or resolve disputes. In addition, the scope and level of social benefits – such as the rental subsidy – in the Caribbean Netherlands remain significantly lower than in the European Netherlands. This disparity further entrenches socio-economic inequalities and limits the capacity of low-income households in the Caribbean Netherlands to achieve a decent standard of living. The Institute therefore stresses the importance of harmonizing key legal protections and expanding institutional mechanisms to ensure equal treatment, regardless of geography.

Suggestions for questions:

- *How does the Government plan to ensure that the newly established poverty threshold leads to concrete and measurable improvements in living conditions across all three islands?*
- *What actions will the Government take to reach the social housing building goals it has set up taking into account the many delays it has already experienced?*
- *What actions will the Government take to implement (structural) access to housing subsidies for people with a low income renting in the private sector?*

The ban on giving priority to people with a refugee status when assigning social rental housing
(List of issues par. 25-26, State reply to par. 25-26)

37. The Institute is very concerned about a number of legislative proposals that will have a detrimental effect on access to social rental housing for persons holding refugee status. Under current law, municipalities must annually provide housing to a specific number of persons with a refugee status. A proposed bill (*Wet versterking regie volkshuisvesting*) forbids municipalities to accord people with a refugee status a priority status when assigning social housing. In its advice on this draft, the Institute submitted, among other things, that this proposal is discriminatory. Nevertheless, it was adopted by the House of Representatives and is now pending before the Senate. At the same time, another bill (*Wet verbod voorrang vergunninghouders*) is being prepared. Under this draft, municipalities may not accord a priority status to all persons holding a refugee status. They may, however, examine whether persons belonging to this group meet the requirements of urgency. The Government argues that according a priority status to persons holding a refugee status is unfair given the overall shortage of housing. However, generally speaking people with such status do not have equal opportunities to find appropriate housing themselves. As a consequence, they will not be able to leave asylum reception facilities, which are already overcrowded. It is likely that the circumstances for staying in these facilities will deteriorate and in a risk for people becoming homeless. The Institute has very serious concerns about the discriminatory nature of the proposed measures and the Governments' intention to deny people with a refugee status (equal) access to adequate housing.

Suggestion for a question:

Can the Government clarify how the ban on giving priority to people with a refugee status when assigning social rental housing relates to the State's obligations under the Convention?

Reception facilities for asylum seekers (List of issues par. 26, State reply to par. 26, Institute's written submission to PSWG par. 35-37)

38. The Institute is seriously concerned about government policies that affect reception facilities for asylum seekers. There is no structure to meet the fluctuations in numbers of persons seeking asylum, and no steps are being taken to remedy this. As a consequence, many existing accommodations are

inadequate. For example, about 50 percent of all persons residing in asylum reception centres stay in emergency facilities, which are unsuitable for long-term stay. The rights of children are affected in particular, they are at a serious risk of permanent and potentially irreparable harm due to substandard facilities and the many transfers between reception locations. The Government holds the view that reception centres must be 'austere' in order to dissuade people from seeking asylum in the Netherlands.

39. Various (proposed) government measures are likely to further deteriorate the situation. The Government intends to revoke the Act that obliges municipalities to realise reception facilities for persons seeking asylum (*Spreidingswet*), even though most municipalities support this Act. This shift and the debate concerning the Act has made it more difficult for municipalities to realise reception facilities.
40. As explained above (par. 37), legislation is being drafted to limit access to social rental housing for persons holding refugee status. This will result in longer stays in the reception centres. Various advisory bodies, including the Institute, have pointed to the consequences of the proposed legislation. It will result in an increased workload for Immigration and Naturalisation Services and the judiciary. Also this will have as a result that more people will be staying longer in the reception centres.

Suggestion for a question:

What steps is the Government taking to safeguard adequate reception facilities for asylum seekers?

Shelter for victims of violence (*List of Issues 14b, 22, State reply to par. 14b, 22*)

41. There is a severe lack of shelter facilities for women who are victims or at risk of becoming victims of gender-based violence.⁵¹ To meet the demands, shelter organisations have to resort to alternative accommodation, for example hotels. In addition, due to the overall shortage of housing, many women cannot find permanent housing and cannot leave the shelter. This impacts the accessibility of the shelters for victims and the access to the various forms support necessary. The number of shelters is not in conformity with the international norm of 1 shelter per 10.000 persons.⁵² However, the Government stated that this norm is not decisive within their policies. This is a point of concern, particularly because of the combination of the shelter shortage, housing shortage and the (often weaker) financial position of women.⁵³ This puts victims (more) at risk.

Suggestions for questions:

- *What measures does the Government take to meet the international norm regarding available shelters?*
- *What measures will the Government take to protect the right to adequate housing for women who are victims of gender-based violence?*

Travellers, Roma and Sinti (*List of Issues par. 13, State reply to par. 13*)

42. In 2018, the Government presented a policy framework on the right of Travellers, Roma and Sinti to live according to their cultural identity. This policy constitutes a major shift after years of a policy aimed at ending the allocation of specific sites.⁵⁴ It requires municipalities to provide sufficient housing (pitches) for this group, where they can live according to their cultural identity. However, there continues to be a lack of pitches.⁵⁵ Many municipalities have not yet conducted a needs assessment, and the total number of desired pitches is therefore unknown. An additional problem is that obtaining a mortgage to finance buying trailers is difficult and is consistently rejected by banks.⁵⁶ Housing corporations are not inclined to provide trailers for rent. This means that there is no prospect of having more, and enough, pitches in the near future. In May 2024, a Court ruled, for the first time, that a municipality discriminated against Travellers by not expanding the amount of housing sites.⁵⁷ This is a positive development, but the Institute continues to be worried about the lack of improvement and plans in providing an adequate standard of living for Travellers, Roma and Sinti.

Suggestion for a question:

What concrete measures will the Government take to exercise more control over the implementation by municipalities, in particular when it comes to realizing sufficient adequate places that match the cultural identity of Travellers, Roma and Sinti?

Article 12: the right to health

Access to healthcare (*List of Issues par. 27a, Institute's written submission par. 31-38*)

43. As recorded in the Institute's 2023 written submission, the right of access to healthcare is under pressure. There is a growing gap between the demand for care and the capacity of the system to meet that demand.⁵⁸ Problems exist for example in access to mental health care and gender-affirming care. It is a point of concern that a growing number of individuals have no access to a general practitioner.⁵⁹ The Institute is particularly worried about irregular migrants' access to care, which is already limited. The proposed criminalisation of irregular stay (see par. 9), might limit their access even further as medical practitioners might not be allowed to provide medical help due to this.⁶⁰
44. The strain on the healthcare system is mainly due to financial and staff shortages.⁶¹ The Government has stated intentions to increase (more equal) access to healthcare, but these mainly focus on quantitative aspects of (financial) accessibility and labour saving interventions to lower waiting lists. The Institute is concerned about the potential impact on the quality of consistent (access to) healthcare.

Suggestion for a question:

How will the Government ensure that everyone has reliable and consistent access to comprehensive, high-quality healthcare?

Article 13: the right to education

Digital accessibility for students with disabilities (*List of Issues par. 28, State reply to par. 28, Institute's written submission to PSWG par. 42*)

45. A recent study of the Institute shows that students with disabilities experience digital inaccessibility in education.⁶² Examples are inaccessible websites and applications, such as digital learning resources, digital tests and online management and learning environments. The CRPD Committee has recently recommended the Government to ensure that mainstream schools are fully accessible and provide reasonable accommodation for all students with disabilities.⁶³ Sufficient and binding digital accessibility requirements are currently lacking for the education sector. Various ministries are discussing how requirements for digital accessibility can be applied to the education sector.⁶⁴ The Institute is concerned about the lack of a concrete timeline in this regard.

Suggestion for a question:

When and how will the Government ensure that digital accessibility requirements apply to the whole of the education sector?

Article 15: cultural rights

Discrimination of religious minorities

46. The Institute observes that cultural identities that are not part of 'mainstream identities' are increasingly under attack. A recent study found that discrimination against Muslims is a widespread phenomenon in the Netherlands that occurs in different domains and stages of life, can take different forms, and often forms a pattern.⁶⁵ The study points out that discrimination against Muslims is becoming increasingly normalised in all levels of society. This is also reflected in the number of received reports of discrimination against Muslims, which is increasing – ranging from not being allowed to pray at school to being barred from wearing a headscarf at work.⁶⁶ The Institute is also concerned about (draft) legislation and regulation that negatively affects Muslims, for example the ban for law enforcement officers on wearing religious symbols and the bill on supervision of informal education (*Wet toezicht informeel onderwijs*). Both appear to use neutral criteria, but are expected to particularly affect women who wear headscarves and Islamic weekend schools, respectively. Prejudices and generalisations about Muslims fuel negative perceptions among non-Islamic citizens.
47. Since the war in Gaza, antisemitism in the Netherlands has increased. Jewish people report that they are confronted with hostilities, violence and the spread of negative stereotypes about Jewish people.⁶⁷ In educational institutions, children and students face discrimination and report that they feel unsafe due to hostilities from fellow students.⁶⁸ The Institute urges the Government to take all measures necessary to combat these perceptions and eradicate discrimination against Muslims and Jews.

Suggestion for a question:

What steps will the Government take towards developing an effective and sustainable approach to combat the discrimination and stigmatisation of religious minorities within both Government and society as a whole?

Endnotes

¹ Constitutional review of Acts of Parliament by the judiciary is currently prohibited under Article 120 of the Constitution. The bill proposes an amendment of the Constitution to allow constitutional review for those rights that are enshrined in chapter 1 of the Constitution. For the bill, see:

<https://www.internetconsultatie.nl/constitutieetoetsing/b1>.

² Letter of the Minister of the Interior and Kingdom Relations and State Secretary for Legal Protection, *Kamerbrief over contourennota constitutionele toetsing* (Concept paper on constitutional review), 21 February 2025.

³ See for example: Netherlands Institute for Human Rights, *Brief ter inbreng van commissiedebat constitutionele toetsing* (Written submission for Parliamentary Committee debate on constitutional review), 21 May 2025.

⁴ Minister and State Secretary of Health, Welfare and Sport, *Nadere beleidsreactie op de voorlichting van de Raad van State over facultatieve protocollen VN-verdrag handicap IVRK en IVESCR* (Reply to the information of the Council of State on the Optional Protocols of CRPD, ICRC and ICESCR), 31 May 2024.

⁵ The [Government program](#) contains the following passage: *'The scale of migration to the Netherlands must be drastically reduced as quickly as possible with the most comprehensive package of measures ever implemented to control migration. Only by limiting the influx can the government continue to fulfil its constitutional duties: providing public housing, healthcare, and education. For asylum migration, the cabinet is taking the first concrete steps toward the strictest asylum regime ever. The Netherlands must belong to the category of member states with the strictest admission rules in the EU. The cabinet is therefore taking all measures to limit the influx of asylum seekers, insofar as those measures are in accordance with European regulations and international treaties.'*, p.19.

⁶ Ministry of Health, Welfare and Sport, *Nationaal Actieplan Dakloosheid: Eerst een Thuis* (National Action Plan on Homelessness: Housing First), November 2022.

⁷ This obligation follows from the *Wet versterking participatie op decentraal niveau* (Strengthening Participation at the Decentralized Level Act), there is a transition period until 1 January 2027 for local governments to become compliant.

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⁹ PBL Netherlands Environmental Assessment Agency, *Klimaatdoel 2030 raakt uit zicht; extra beleid met snel effect nodig* (Climate target for 2030 slipping out of reach; additional policy measures with rapid effect needed), 24 October 2024 and NOS (national news), *Minister Hermans: er gebeurt te weinig om klimaatdoelen te halen* (Minister Hermans: too little action is being taken to achieve climate goals), 24 October 2024. Also see the Council of State's reviews of the Government's Climate Plans and Climate Memoranda: <https://www.raadvanstate.nl/climate/reports/>.

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¹¹ Minister of Climate and Green Growth, *Reactie op het rapport 'Mensenrechten in Nederland 2023: Realisatie van het recht op een schoon, gezond en duurzaam leefmilieu in Nederland – Deel 2: Nederlands klimaatbeleid in het licht van artikel 8 EVRM', van het College voor de Rechten van de Mens* (Reply to part 2 of the Annual Report on Human Rights in the Netherlands 2023 by the Netherlands Institute for Human Rights), 7 May 2025. But see also: Climate Adaption Forum

Netherlands, [Island-level adaption](#) and Greenpeace, [Dutch citizens start lawsuit against the Netherlands over climate impacts on Caribbean island Bonaire](#), 11 January 2024.

¹² European Commission, [Commission proposals for the Omnibus I and Omnibus II packages](#), 26 February 2024.

¹³ Ministry of Foreign Affairs, [BNC fiche 2 – Voorstel Omnibus I CSRD CSDDD](#) (BNC fiche 2 – Proposal Omnibus I CSRD CSDDD), 24 March 2025.

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¹⁵ CBS, [Ervaren discriminatie in Nederland 2023](#) (Experienced discrimination in the Netherlands 2023), 13 December 2024.

¹⁶ Ministry of Social Affairs and Employment, [Kamerbrief over Offensief Gelijke Kansen](#) (Equal Opportunities Approach), 12 March 2025.

¹⁷ Netherlands Institute for Human Rights, [Zwanger en werk: dat baart zorgen - Derde onderzoek naar discriminatie op de arbeidsmarkt van zwangere vrouwen en moeders met jonge kinderen](#) (Pregnancy and work: Third research on discrimination against pregnant women and mothers with young children on the labour market), November 2020.

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¹⁹ CBS, [De arbeidsmarkt in cijfers 2024](#) (The labour market in numbers 2024), 29 April 2025.

²⁰ Nivel, [Participatiemonitor kerncijfers 2023](#) (Participation monitor key figures 2023), January 2025, p. 7.

²¹ De Beleidsonderzoekers, [Literatuursynthese naar ervaren knelpunten bij werk, inkomen en sociale zekerheid voor mensen met een beperking](#) (Literature synthesis on perceived barriers to work, income and social security for people with disabilities), April 2025, p. 77.

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- ³⁴ De Beleidsonderzoekers, [Literatuursynthese naar ervaren knelpunten bij werk, inkomen en sociale zekerheid voor mensen met een beperking](#) (Literature synthesis on perceived barriers to work, income and social security for people with disabilities), April 2025, p. 112-114.
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