

Disability Rights Agenda

2025

Shadow Report

The implementation of the UN Convention
on the Rights of Persons with Disabilities in
Armenia



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Shadow Report

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Contact Information:

- **Organization Address:** 12 Gr. Lusavorich Street, Yerevan 0015, Armenia
- **Phone Number:** +374 77 400 350
- **Email Address:** info@dra.am

Prepared By: Mushegh Hovsepyan

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About the Organization

Disability Rights Agenda (DRA), an organization founded in 2021 in Armenia by persons with disabilities, was established to address the urgent need for advocacy and systemic change following the 2020 war in Nagorno-Karabakh and during a time of significant political and social challenges. While many organizations primarily focused on service provision, DRA emerged to fill critical gaps in promoting, protecting, and monitoring the rights of persons with disabilities. Guided by the principles of the United Nations Convention on the Rights of Persons with Disabilities, DRA aims to foster a more inclusive and equitable society in Armenia.

As a cross-disability organization, DRA represents a diverse range of individuals, including those with psychosocial disabilities and other marginalized groups. DRA implements a wide array of initiatives to advance disability rights, including:

- Advocacy - Advocating for policy and legislative reforms to bring Armenia's national frameworks into alignment with international human rights standards, including the CRPD, CEDAW, CESCRC, and CRC.
- Research and Monitoring - Conducting studies and publishing reports on key disability-related issues such as accessibility, deinstitutionalization, and systemic barriers, while actively monitoring the implementation of disability rights policies and frameworks.
- Service Provision - Delivering legal aid, social work support, and peer-led assistance to help persons with disabilities navigate challenges in obtaining disability status, accessing services, and securing justice.
- Capacity Building - Empowering persons with disabilities through training, mentorship, and resource sharing to strengthen their capacity for effective advocacy.
- Public Awareness - Raising awareness of disability rights and promoting inclusion through educational campaigns, media outreach, and public events.

As an associate member of the European Disability Forum¹, DRA also contributes to regional and international advocacy efforts, championing the rights and dignity of persons with disabilities on a broader scale.

¹ European Disability Forum, EDF, www.edf-feph.org

Methodology

This shadow report provides an alternative perspective on Armenia's implementation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The methodology adopted for this report combined data collection, analysis, and stakeholder consultations to ensure the information reflects the lived experiences and priorities of persons with disabilities, as well as Disability Rights Agenda as a representative organization. The topics covered were identified through consultations with other organizations of persons with disabilities to avoid duplication and focus on issues not explicitly addressed by others, ensuring critical gaps in Armenia's CRPD implementation are highlighted.

The report draws on diverse data sources, including national legislative acts, policies, and strategies related to disability rights and other relevant areas. It incorporates findings from national and international reports published by the Human Rights Defender's Office, United Nations agencies, and local civil society organizations. First-hand accounts and testimonies of persons with disabilities were gathered through interviews, focus group discussions, surveys, and legal cases documented by Disability Rights Agenda NGO. Additionally, statistical data from government agencies, such as the Statistical Committee of Armenia, and findings from independent studies and reports were used to inform the analysis.

To ensure inclusivity and alignment with the lived realities of persons with disabilities, DRA convened a public consultation meeting before finalizing the report. Feedback from other disability rights advocates was incorporated to validate findings and ensure alignment with CRPD principles and standards. The analysis followed the CRPD's human rights-based approach, with an emphasis on addressing intersectional discrimination, accessibility, and inclusion.

This report acknowledges several limitations, including restricted access to government-held data and statistics on disability-related issues, particularly disaggregated data by gender, age, and type of disability. Additionally, logistical and resource constraints limited participation from certain groups, particularly those in rural and remote areas.

The suggested questions were developed based on analysis, stakeholder inputs, best practices identified in other shadow reports, and the overarching goal of ensuring Armenia's full compliance with its obligations under the CRPD.

Executive summary

This shadow report reviews Armenia's implementation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), highlighting key gaps and challenges in ensuring the rights and inclusion of persons with disabilities. Prepared by Disability Rights Agenda, an organization led by persons with disabilities, the report reflects the lived experiences of persons with disabilities, particularly marginalized groups, and is grounded in extensive research and monitoring.

While Armenia has made legislative progress, systemic issues persist. Disability assessment processes remain overly medicalized and lack transparency, excluding critical environmental factors. Persons with disabilities continue to face significant barriers in accessing education, employment, healthcare, and social protection, with marginalized groups disproportionately affected.

Accessibility monitoring within public administration remains inadequate, and disaster preparedness efforts fail to account for the needs of persons with disabilities. Women, children, and refugees with disabilities face compounded exclusion and discrimination, further limiting their opportunities and rights.

The report emphasizes the limited engagement of organizations of persons with disabilities in policy-making processes and the urgent need for more effective consultation mechanisms. It also highlights persistent gaps in areas such as freedom of movement, employment, poverty reduction, and the transition to community-based support systems.

To address these issues, the report includes suggested questions for the CRPD Committee to raise with the Armenian government, drawing on prior recommendations from the Committee's concluding observations. These questions aim to foster transparency, accountability, and progress across multiple areas.

Article 4: General obligations

1. Disability Assessment

The process of disability assessment in Armenia remains fraught with significant challenges, impacting the rights and inclusion of persons with disabilities. Despite reforms, the system fails to align with a human rights-based approach, as outlined by the UN Convention on the Rights of Persons with Disabilities. Although the adoption of the Law "On the Assessment of Persons' Functionality"² in 2021 marked a legislative effort to shift from the medical model to a human rights-based approach, the law has generally failed to deliver its intended outcomes.

The Disability Rights Agenda has actively challenged the opacity of the disability assessment process. In 2023, Disability Rights Agenda (DRA) filed a public interest lawsuit against the Ministry of Labour and Social Affairs, citing the lack of transparency surrounding the algorithm used for disability assessments.^{3 4} The Ministry has consistently refused to disclose the algorithm, depriving individuals of the ability to understand or challenge decisions regarding their disability status.

In 2024, during court hearings, the DRA exposed that the algorithm used for disability assessment was not established by any legal act and relied solely on medical criteria. This approach failed to consider environmental factors that significantly impact an individual's ability to participate fully in society. Also, the self-assessment of persons with disabilities is not having an impact on the final decision. This exclusion contradicts both the Convention and the Law "On the Rights of Persons with Disabilities", which mandate a comprehensive assessment that considers environmental barriers.

² Law of the Republic of Armenia on Assessment of Personal Functionality, accepted May 5, 2021, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=199721>.

³ Disability Rights Agenda (DRA), "Legal Challenge Filed Over Disability Assessment Formula," September 4, 2023, <https://dra.am/hy/news/legal-challenge-filed-over-disability-assessment-formula>.

⁴ "Is the Algorithm for Determining the Degree of Limitation of a Person's Functionality Correct? Ministry Appeared in Court," Hetq, September 20, 2024, <https://hetq.am/hy/article/169591>.

The Administrative Court ruled in October 2024 that the algorithm is illegal due to its failure to account for environmental factors⁵. However, the court did not deem the lack of transparency surrounding the algorithm to be unlawful.⁶ In response, DRA appealed this aspect of the decision to the Administrative Court of Appeal. Simultaneously, the Ministry of Labour and Social Affairs filed an appeal, arguing that the algorithm already incorporates environmental factors through its 'd' (activity and participation) codes⁷ under the International Classification of Functioning, Disability and Health (ICF) framework⁸. However, this interpretation conflates 'd' codes with true environmental ('e') codes, reflecting a systemic misunderstanding of the distinct role environmental factors play in shaping disability.

⁵ The ICF: An Overview, Centers for Disease Control and Prevention, "The ICF includes environmental factors in recognition of the important role of environment in people's functioning. These factors range from physical factors (such as climate, terrain or building design) to social factors (such as attitudes, institutions, and laws). Interaction with environmental factors is an essential aspect of the scientific understanding of 'functioning and disability'," https://www.cdc.gov/nchs/data/icd/icfoverview_finalforwho10sept.pdf.

⁶ The Judgment of the Administrative Court of the Republic of Armenia on October 28, 2024, in the case of "Agenda of the Rights of Persons with Disabilities" against the Ministry of Labor and Social Affairs of the Republic of Armenia in case VD/6668/05/23, "Regarding the argument presented by the Claimant's representatives that the failure to disclose the algorithm results in discriminatory treatment of persons with disabilities, the Court, considering the specific nature of granting disability status, first notes that the non-disclosure of the said algorithm cannot be regarded as a manifestation of discrimination. It is instead a characteristic aimed at creating objective conditions for addressing the issue of recognizing or rejecting the disability status of individuals applying for recognition, which primarily serves the interests of persons with disabilities. The Court also observes that the mere fact that algorithms used in other fields are made public does not justify this approach, and that the publication of formulas in other fields does not mean that all formulas, including those used in the definition of disability, must necessarily be made public," https://datalex.am:443/?app=AppCaseSearch&case_id=38562071809986469.

⁷ D Codes in the ICF Represent Activities and Participation, REHADAT-ICF, "Activity refers to the execution of a task or action by an individual, and participation refers to involvement in a life situation. Activity limitations pertain to difficulties in performing activities, while participation restrictions relate to challenges in engaging in life situations," <https://www.rehadat-icf.de/en/klassifikation/aktivitaeten-partizipation/>.

⁸ World Health Organization, International Classification of Functioning, Disability and Health (ICF), <https://www.who.int/standards/classifications/international-classification-of-functioning-disability-and-health>.

The Ministry justified its approach by claiming that including environmental factors would increase the number of individuals recognized as having disabilities, implying a financial or administrative burden.⁹

Disability assessment is a prerequisite for accessing critical rights and services in Armenia, such as free healthcare, subsidized education, and disability benefits. Those not recognized as being persons with disabilities are effectively excluded from these essential services, exacerbating their marginalization.

Additionally, the disability assessment process suffers from a lack of a transparent and comprehensive review mechanism. Applicants face confusion and frustration due to inconsistent procedures and unclear criteria for appeals. The courts are similarly hindered by the absence of well-defined legal processes for handling disability-related claims, leading to significant variations in case outcomes.¹⁰

Despite the introduction of a new information system intended to streamline disability claims, data inaccuracies persist, undermining the consistency and fairness of the process.

Suggested questions:

1. What measures will Armenia implement to ensure transparency in the disability assessment process, particularly regarding the algorithm used for evaluations? How will the State ensure individuals have access to the criteria and decision-making processes?
2. How will Armenia ensure that the algorithm used in the disability assessment system is revised to align with a human rights-based model? What steps will be

⁹ Milena Khachikyan, "The Secret Algorithm for Functionality Assessment: Persons with Disabilities Complain about the Reformed System," October 12, 2024, available in Armenian, <https://infocom.am/hy/article/139750>.

¹⁰ In administrative case No. VD/4939/05/24, the Administrative Court decided to receive a third opinion due to the lack of specialized knowledge (including on health) and appointed a forensic medical examination, the execution of which was assigned to the "National Bureau of Examinations" (https://datalex.am:443/?app=AppCaseSearch&case_id=38562071809997815). In contrast, in case VD6/0485/05/23, the court did not have a third-party opinion or conclusion but, without it, adopted a judgment refusing to determine person as having a disability for a child who had diabetic ketoacidosis (https://datalex.am:443/?app=AppCaseSearch&case_id=38562071809989832).

taken to ensure the revised system incorporates environmental factors and the self-assessment of persons with disabilities?

3. What measures will Armenia adopt to establish transparent, consistent, and accessible review mechanisms for individuals contesting disability assessment decisions, both through extra-judicial processes and the courts?

2. Consultation and Engagement of OPDs

Despite the obligations outlined in the Convention and the law “On the Rights of Persons with Disabilities”¹¹ mandating the involvement of persons with disabilities and their representative organizations in legislative and policy-making processes, the Armenian government lacks the capacity to ensure meaningful and inclusive engagement. Although legislation^{12 13} mandates that most laws and normative legal acts be discussed with the public before adoption, many documents are not published or made accessible prior to their approval by the government.

The government often relies on the e-draft.am platform¹⁴ to publish draft policies, but these are typically made available for only a 15-day discussion period. This limited timeframe, combined with the complex legal language of the documents, poses significant challenges for persons with disabilities and OPDs to engage effectively.¹⁵

¹¹ Law of the Republic of Armenia on the Rights of People with Disabilities, accepted May 5, 2021, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=196661>.

¹² Republic of Armenia, RA Law on Normative Legal Acts, adopted March 21, 2018, Chapter 2, available in Armenian, <https://arlis.am/documentview.aspx?docid=187324>.

¹³ Republic of Armenia, RA Government Decision No. 1146 of October 10, 2018, Procedure for Organizing and Conducting Public Discussions, available in Armenian, <https://arlis.am/DocumentView.aspx?DocID=126002>.

¹⁴ Unified Website for Publication of Legal Acts' Drafts, available in Armenian, <https://www.e-draft.am/about>.

¹⁵ “Finally, persons with disabilities, organizations of persons with disabilities, civil society organizations, the medical community, and other stakeholders were apparently not consulted in the initial drafting, nor informed about how comments received through the online consultation will be considered and the timeline for adopting the draft Decree. Here we wish to refer to the obligation of States to closely consult with and actively involve persons with disabilities in decision-making processes concerning matters relating or affecting their lives as per article 4(3) of the CRPD. Notably, in its General Comment No. 7, the CRPD Committee clarified that States must ensure the transparency of consultation processes, provide appropriate and accessible information, and involve persons with disabilities early and continuously. The publication of the draft Decree for consultation on a public website without any accessibility measures

Following this platform requires resources, legal knowledge, and expertise to understand the wording and provide actionable recommendations, making it an inaccessible option for many.

Even when OPDs submit well-justified recommendations, the government does not always adopt or meaningfully address them, resulting in a lack of continuity in dialogue and diminishing trust.

Moreover, not all groups of persons with disabilities are invited to the decision-making table. Groups, such as refugees with disabilities, children with disabilities, and others, are frequently excluded from consultations.

Physical or online public discussions are increasingly rare, and when held, they are often not accessible for persons with disabilities.

Suggested questions:

1. What steps will Armenia take to ensure meaningful and inclusive engagement of all groups of persons with disabilities, including refugees with disabilities, children with disabilities, and others, in legislative and policy-making processes?
2. How will Armenia address barriers in the consultation process, such as the limited timeframe for public discussions on the e-draft.am platform and the complex legal language of draft policies, to ensure effective participation of persons with disabilities and OPDs?
3. What measures will Armenia implement to ensure that physical and online public discussions are held regularly and are fully accessible to persons with disabilities?

and opportunities for involvement throughout the drafting process therefore would fall short of the State's obligations under the CRPD," Ref.: OL ARM 1/2022 Mandates of the Special Rapporteur on the Rights of Persons with Disabilities; the Special Rapporteur on the Right of Everyone to the Enjoyment of the Highest Attainable Standard of Physical and Mental Health; the Special Rapporteur on Violence Against Women and Girls, its Causes and Consequences; and the Working Group on Discrimination Against Women and Girls, December 22, 2022, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=27753>.

Article 5: Equality and non-discrimination

While Armenia's Law "On the Rights of Persons with Disabilities" provides a human rights-based definition of disability-based discrimination and grants organizations of persons with disabilities the right to file public interest cases in court (*actio popularis*)¹⁶, significant gaps remain in the country's anti-discrimination framework.

Armenia lacks a comprehensive anti-discrimination law¹⁷ that would provide a unified and robust framework for addressing discrimination on all grounds. The current legal framework does not sufficiently outline the processes and protections necessary to effectively combat discrimination, leaving many instances of disability-based discrimination unaddressed.

Despite the provisions in the disability rights law, cases of disability-based discrimination are rarely, if ever, brought before courts in Armenia. This is partly due to the absence of clear procedural rules for handling discrimination cases. For instance, the burden of proof in cases of discrimination is not shifted to the respondent, as is standard in discrimination cases in line with international best practices. This places an undue burden on individuals and OPDs, making it significantly harder to prove discrimination.

Furthermore, the law fails to address intersectional forms of discrimination, which remain a significant challenge. A new anti-discrimination law should include protections on all grounds, such as gender, sex, gender identity, gender expression, sexual orientation, and characteristics, to ensure an inclusive and effective legal framework.¹⁸

¹⁶ "The Problems of Exercising the Right of Non-Governmental Organizations to Apply to Courts in Cases of Protecting Public Interest," November 15, 2024, <https://hcav.am/en/actio-popularis-2024/>.

¹⁷ "Armenia: New Draft Law on Antidiscrimination Is Now Open to Public Discussion," CSO Meter, July 31, 2024, <https://csometer.info/updates/armenia-new-draft-law-antidiscrimination-now-open-public-discussion>.

¹⁸ "Armenia: ECRI Notes Progress, but Says All Discrimination Grounds Must Be Covered by Law, Hate Speech Tackled Effectively," Council of Europe, June 20, 2023, https://www.coe.int/en/web/yerevan/news/-/asset_publisher/UINPvpZUDPS7/content/armenia-ecri-notes-progress-but-says-all-discrimination-grounds-must-be-covered-by-law-hate-speech-tackled-effectively.

Armenia has yet to establish an equality body or empower its Human Rights Defender's Office (National Human Rights Institution) with the competency to receive and address complaints of discrimination, including those related to disability. This gap leaves individuals without a clear mechanism to seek justice and remedies for discriminatory practices.

In 2023, a group of children with disabilities was denied entry to one of Yerevan's water and amusement parks.¹⁹ The justification provided was the facility's lack of accessibility, which prevented the simultaneous safe access and entertainment of the group.²⁰ Following an investigation, the Human Rights Defender of Armenia, as the monitoring mechanism of the UN Convention on the Rights of Persons with Disabilities, concluded that the incident was not a case of disability-based discrimination, stating: "Based on the obtained data, the Human Rights Defender notes that the cause of the incident is not the discriminatory treatment of persons with disabilities, but the inaccessibility of the company's [...] entertainment place for persons with disabilities, which is universal in the Republic of Armenia."²¹

This conclusion sparked criticism from organizations of persons with disabilities, including the Disability Rights Agenda, which argued that inaccessibility itself constitutes discrimination based on disability. In response, the Human Rights Defender removed the paragraph and explained that there had been a misunderstanding.²² Nevertheless, the case was not officially identified as discrimination by the Human Rights Defender.

Suggested questions:

¹⁹ "Human Rights Defender Anahit Manasyan's Reaction to the Blocking of Access of Children with Disabilities to 'Water World'," Human Rights Defender of Armenia, August 6, 2023, https://www.ombuds.am/en_us/site/ViewNews/2642.

²⁰ "The Results of the Human Rights Defender's Study on the Incident at 'Aquatek'," Human Rights Defender of Armenia, August 8, 2023, https://www.ombuds.am/en_us/site/ViewNews/2643.

²¹ "The Results of the Human Rights Defender's Study on the Incident at 'Aquatek'," Human Rights Defender of Armenia's Statement Without Changes, August 8, 2023, Shantnews, available in Armenian, <https://www.shantnews.am/news/view/1338762.html>.

²² "Explanation," Human Rights Defender of Armenia, August 8, 2023, https://www.ombuds.am/en_us/site/ViewNews/2644.

- When will Armenia adopt a comprehensive anti-discrimination law that provides a unified and robust framework for addressing discrimination on all grounds?
- How will Armenia ensure the development and implementation of clear procedural rules for handling disability discrimination cases, including shifting the burden of proof to the respondent in line with international standards?
- What steps will Armenia take to establish an independent and adequately resourced equality body to receive and address complaints of discrimination, including those based on disability?
- How will Armenia support organizations of persons with disabilities in exercising their right to file public interest cases in instances of discrimination?

Article 6: Women with disabilities

Armenia faces significant challenges in ensuring the inclusion of over 100,000 refugees who fled Nagorno-Karabakh following Azerbaijan's ethnic cleansing of the region in September 2023.²³ Unfortunately, disability and gender perspectives are often overlooked in these discussions.²⁴

The UNHCR-led Armenia Emergency Refugee Response Plan was underfunded, and initiatives supporting refugees with disabilities, especially those girls and women with disabilities, have been insufficient.²⁵

Refugee women with disabilities who have sought safety in Armenia encounter numerous barriers that exacerbate their vulnerability and limit their ability to live independently. Many face difficulties accessing disability benefits and social services due to complex administrative hurdles and the transition to Armenia's new disability assessment model, which differs significantly from the system previously used in Nagorno-Karabakh.²⁶

Access to essential services such as housing, healthcare, and education remains a critical issue. Refugee women with disabilities frequently encounter inaccessible housing options, limiting their independence and increasing the risk of institutionalization.²⁷

²³ Why Are There No Armenians in Nagorno-Karabakh? Special Report 2024, Freedom House, <https://freedomhouse.org/report/special-report/2024/why-are-there-no-armenians-nagorno-karabakh>.

²⁴ Olesya Vartanyan, "Armenia Struggles to Cope with Exodus from Nagorno-Karabakh," International Crisis Group, March 4, 2024, <https://www.crisisgroup.org/europe-central-asia/caucasus/armenian-azerbaijani-conflict-armenia/armenia-struggles-cope-exodus>.

²⁵ "UN and Partners Appeal for US\$97 Million to Respond to Urgent Needs of Refugees and Their Hosts in Armenia," UNHCR, October 7, 2023, <https://www.unhcr.org/news/press-releases/un-and-partners-appeal-us-97-million-respond-urgent-needs-refugees-and-their>.

²⁶ Gender Alert II: Disability Inclusion and Gender Dynamics of the Armenia Refugee Crisis, United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and Disability Rights Agenda, April 2024, <https://eca.unwomen.org/en/digital-library/publications/2024/05/gender-alert-ii-disability-inclusion-and-gender-dynamics-of-the-armenia-refugee-crisis>.

²⁷ "Armenia and Azerbaijan: Effective Human Rights Protection of All Persons Affected by the Conflict Over the Karabakh Region Is Key to the Success of the Peace Process," Council of Europe Commissioner for Human Rights, January 12, 2024, <https://www.coe.int/en/web/commissioner/-/armenia-and->

Specialized healthcare and rehabilitation services, including those tailored for women with disabilities, are scarce, and reproductive and sexual health needs are often neglected.

Social isolation and exclusion are pervasive, particularly for deaf refugee women and those with intellectual disabilities. They face compounded risks of violence, exploitation, and abuse, often left unsupported due to the absence of culturally sensitive and accessible communication systems.

Suggested questions:

1. What measures will Armenia take to ensure refugee women with disabilities have equitable access to essential services, including disability benefits, accessible housing, and healthcare?
2. How will Armenia address the compounded risks of violence, exploitation, and social isolation faced by refugee women with disabilities, particularly deaf women and those with intellectual disabilities, by providing accessible and culturally sensitive communication systems?
3. What steps will Armenia take to prioritize and address the reproductive and sexual health needs of refugee women with disabilities, ensuring these services are inclusive and accessible?

Article 7: Children with disabilities

In 2023, a group of NGOs (including Disability Rights Agenda) with access to state care institutions²⁸ released a report²⁹ on one of the crisis centers for children. The report detailed incidents of physical and sexual violence involving children, both as victims and perpetrators. It highlighted issues such as girls being given a single razor to share, inadequate provision of sanitary pads, and observed scars on children's hands, indicating suicide attempts. A 15-year-old pregnant girl, who was likely experiencing disabilities as described by others, expressed her desire not to have the baby and mentioned suicidal thoughts, but the center's director stated that the Ministry of Labour and Social Affairs instructed not to discuss abortion. The girls damaged the camera in their common room because they felt unsafe with a male guard monitoring the surveillance. Children also reported being threatened by a police officer and mentioned instances of violence from the guard and medical staff. They also described sexual abuse by older boys towards younger boys, especially a boy with intellectual disabilities.

Despite these serious concerns, no criminal case was initiated based on the report, and no one was held accountable for the failures in child protection. Months later, the Ministry disbanded the monitoring group, leaving NGOs without access, which the group perceived as a response to their findings.³⁰

Suggested questions:

²⁸ The group, consisting of at least 9 members representing various NGOs, was established by the RA Minister of Labor and Social Affairs in 2018. The group had unrestricted access to care institutions, including nursing homes, orphanages, and crisis support centers. Republic of Armenia, Minister of Labour and Social Affairs, Order No. 112-A/1 of October 16, 2018, Regarding the Creation of a Group Consisting of at Least 9 Members Representing Various Public Organizations, available in Armenian, https://old.mlsa.am/wp-content/uploads/2017/05/112-A-1-hraman.pdf?fbclid=IwAR1iQeQoPDDt5Q4OwJKWxNzRXy_UeEN7ljBLtdBzecreCK5qYhv4bBcLEfs.

²⁹ Monitoring Group in Care Institutions, Report Urgent, Yerevan "Easter" Children's Support Center, 2023, regarding the March 29 visit, available in Armenian, https://drive.google.com/file/d/1PCifWhWVnwMXozt35WsB7vK6lvhvwXV6/view?fbclid=IwY2xjawH0jNMBHWcdgPyB1zQsdWQzMfAPCD_HweE52PAB711yNP6iOogs103cRshAr8WuEA.

³⁰ "Joint Announcement of 7 NGOs on the Termination of the Monitoring Group in Care Institutions," Disability Rights Agenda, May 31, 2024, available in Armenian, <https://dra.am/articles/latest-news/joint-announcement-on-the-termination-of-the-monitoring-group-in-the-care-institutions>.

1. What steps will Armenia take to ensure accountability for incidents of physical and sexual violence in state care institutions reported by NGOs, including initiating criminal investigations and holding perpetrators and negligent authorities accountable?
2. What steps will Armenia take to restore access for NGOs to state care institutions and support their efforts to ensure the protection and promotion of human rights during the process of deinstitutionalization?

Article 9: Accessibility

Although accessibility standards have been in place in Armenia since 2006³¹, there has been little progress in ensuring that buildings and environments fully comply with these standards. The government has made no significant efforts to improve the monitoring of physical accessibility, and the inspecting body lacks the necessary expertise to properly assess compliance. Local community leaders, who are responsible for signing Certificates of Operation for completed constructions³², often do so without conducting proper checks.

Despite advocacy from organizations of persons with disabilities for establishing a specific monitoring oversight mechanism for accessibility³³, the government has persisted in its stance, arguing that they already have an inspecting body in place. However, the problem lies in the fact that the Urban Development, Technical and Fire Safety Inspectorate³⁴, a body subordinate to the Government of the Republic of Armenia, lacks the necessary resources, knowledge, and expertise to conduct proper inspections. This Inspectorate is mandated to impose sanctions and oversee compliance in the fields of urban development, technical and fire safety, transport, energy, local and national geodesic and mapping activities, and land use. Its inability to effectively fulfill these responsibilities due to insufficient expertise and resources raises significant concerns about its capacity to ensure safety, enforce regulations, and uphold legal standards in these critical areas. NGOs have emphasized that creating a centralized monitoring mechanism would help address the knowledge gap and improve the effectiveness of accessibility monitoring in Armenia. Centralized oversight,

³¹ Minister of Urban Development of the Republic of Armenia, Order No. 253-N, November 10, 2006, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=30091>.

³² Government of the Republic of Armenia, Decision No. 596-N, March 19, 2015, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=99873>.

³³ Civilnet, "Accessibility Commission: A New Bureaucratic Structure or an Incentive for a Barrier-Free Environment?" April 18, 2020, available in Armenian, <https://www.civilnet.am/news/199221/%D5%B4%D5%A1%D5%BF%D5%B9%D5%A5%D5%AC%D5%AB%D5%B8%D6%82%D5%A9%D5%B5%D5%A1%D5%B6-%D5%B0%D5%A1%D5%B6%D5%B1%D5%B6%D5%A1%D5%AA%D5%B8%D5%B2%D5%B8%D5%BE-%D5%B6%D5%B8%D6%80-%D5>

³⁴ Urban Development, Technical Standards and Fire Safety Inspectorate, available in Armenian, <https://www.gov.am/en/bodies-under-government/255/>.

according to OPDs, would provide a more practical solution at this stage, given the widespread lack of knowledge about accessibility standards.

The Human Rights Defender's Office has also expressed opposition, suggesting that the responsibility for accessibility monitoring should fall under their mandate, arguing that they simply need additional budget and staff. Despite this, the Human Rights Defender's Office has been ineffective in handling complaints, such as those submitted by DRA in 2022 regarding new buses in Gyumri, which were not fully accessible. As of now, the Human Rights Defender's Office has not adopted a decision regarding the violation of human rights related to these complaints.

Furthermore, accessibility and universal design are not included in higher education curricula, perpetuating the lack of awareness and expertise on these issues. The government has also failed to ensure that accessibility standards are met in buildings financed by the state budget, including schools, kindergartens, and hospitals.

On December 3, 2024, during the International Day of Persons with Disabilities, the Prime Minister acknowledged the lack of progress on accessibility but justified it by citing financial constraints.³⁵ This explanation is unacceptable, as the government has a duty to prioritize accessibility as a fundamental right.

In response to these ongoing issues, the government planned to make 29 historic public buildings and metro stations accessible.³⁶ Accessibility evaluations for these projects were conducted by international experts.³⁷ However, in 2025, despite

³⁵ Prime Minister of Armenia, "As much as I understand that we are not able to record the progress that we could have hoped for. There are many reasons for this. I think the most obvious reason is that the infrastructures that we have for decades were not designed to meet the needs of people with disabilities. And to put it bluntly, it inevitably takes time to do anything. If we decide now that we are bringing the entire infrastructure to the condition it should have been in, it will mean that the entire state budget of the Republic of Armenia will have to be spent for several years for this purpose. We all understand that this is an impossible task," speech at the National Commission on Disability Issues Session, December 2, 2024, YouTube video, available in Armenian, https://youtu.be/Exjs4-cwyXs?si=tyb8mh_5kIf9SAot&t=46.

³⁶ "Twenty Buildings Considered Historical and Cultural Monuments Will Become Accessible for Persons with Disabilities," Armtimes, March 3, 2022, available in Armenian, <https://www.armtimes.com/hy/article/232326>.

³⁷ "USAID Supporting Armenia's Government in Ensuring Public Accessibility of Buildings," Arminfo, November 30, 2023, https://arminfo.info/full_news.php?id=80666&lang=3.

advocacy efforts from DRA, the government failed to allocate a budget for the design, estimation, or construction needed to make these buildings and metro stations accessible.³⁸

Suggested questions:

1. When will Armenia establish a dedicated accessibility monitoring mechanism, developed in close consultation with organizations of persons with disabilities, to address the existing knowledge and monitoring gaps?
2. What measures will Armenia implement to integrate accessibility and universal design into higher education curricula to build expertise and raise awareness on these issues?
3. How will Armenia ensure that financial planning and resource allocation align with its obligations under Article 9 of the Convention to promote accessibility in buildings, transportation, and public services?

³⁸ Republic of Armenia, Draft State Budget for 2025: Summary Sheet of Public Discussions, available in Armenian, Proposal No. 23, <https://www.e-draft.am/projects/7738/digest?page=1>.

Article 10: Right to Life

Persons with disabilities, particularly those with intellectual disabilities, dementia, and autism, face a heightened risk of going missing in Armenia. While monitoring by Disability Rights Agenda indicates high rates of disappearances among persons with disabilities, including children, the government lacks comprehensive data to understand the scale of the issue.³⁹ Moreover, there is no overarching policy framework to prevent such incidents or provide assistance to individuals at risk. The absence of targeted prevention programs, awareness campaigns, and support systems for persons with disabilities and their families further exacerbates the problem. Tragically, many cases of missing persons result in preventable deaths, highlighting the urgent need for proactive and coordinated measures to address this critical gap.

Suggested question:

1. What measures will the government implement to develop targeted prevention programs, awareness campaigns, and support systems to protect persons with disabilities, particularly those with intellectual disabilities, dementia, and autism, from going missing?

³⁹ Police of Armenia, Webpage of Announcements of Persons Missing, <https://www.police.am/%D5%B6%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/crime-reports/missing-persons.html>.

Article 11: Situations of risk and humanitarian emergencies

Recent flooding in Lori and Tavush⁴⁰ due to heavy rains has caused significant displacement and mobility restrictions, disproportionately affecting persons with disabilities who depend on accessible infrastructure. In Yerevan, inadequate drainage systems have led to widespread flooding, exacerbating the challenges faced by persons with disabilities in accessing homes, transportation, and essential services.⁴¹

The frequency of extreme weather events, including mudflows, landslides, and flash floods, is on the rise as a consequence of climate change. Data shows that from 1935 to 2016, Armenia experienced a 9% decrease in average annual precipitation, while the average temperature has increased by 1.23°C.⁴² Projections indicate that these trends will continue, posing heightened risks to infrastructure and livelihoods, particularly for marginalized communities such as persons with disabilities, who face significant barriers during disaster responses.

The Armenian government has developed a National Adaptation Plan⁴³ and various climate policies; however, these strategies overlook the specific needs of persons with disabilities during disasters. Inclusive disaster management measures are essential to ensure persons with disabilities have access to evacuation routes, emergency information, and basic services.

Persons with disabilities are at greater risk from the health effects of climate change, such as heatwaves, worsened air quality, and vector-borne diseases. Individuals with mobility issues, respiratory conditions, or chronic illnesses may experience heightened vulnerability during extreme weather events, impacting their overall health and

⁴⁰ Azatutyun, "Northern Armenia Hit by Severe Floods (Updated)," May 26, 2024, <https://www.azatutyun.am/a/32964179.html>.

⁴¹ News.am, "Heavy Rains Cause Flooding and Collapses in Yerevan," May 4, 2024, <https://news.am/eng/news/821470.html>.

⁴² World Bank Group & Asian Development Bank, Climate Risk Country Profile: Armenia, 2021, https://climateknowledgeportal.worldbank.org/sites/default/files/2021-06/15765-WB_Armenia%20Country%20Profile-WEB_0.pdf.

⁴³ Republic of Armenia, Government Decree on "Climate Change National Adaptation Action Plan and the List of Measures for 2021-2025", May 13, 2021, <https://www.undp.org/armenia/publications/national-adaptation-plan-republic-armenia>.

wellbeing. Additionally, the emergence of infectious diseases linked to changing climate conditions poses further threats, particularly for those with compromised immune systems or existing health challenges.⁴⁴

Information about impending disasters, evacuation procedures, and recovery support is frequently not provided in accessible formats, such as sign language. This lack of accessible communication systems prevents persons with disabilities from receiving vital, life-saving information during crises.

Suggested questions:

1. What measures will Armenia take to ensure that its disaster management strategies, including the National Adaptation Plan, address the specific needs of persons with disabilities during disasters?
2. When will Armenia establish accessible communication systems for disaster preparedness and response, including providing information in formats such as sign language, braille, and easy-to-read materials?
3. How will Armenia ensure that the impacts of climate change, such as heatwaves, worsened air quality, and emerging infectious diseases, are mitigated for persons with disabilities, particularly those with respiratory conditions, or chronic illnesses?
4. How will Armenia ensure the active participation of persons with disabilities and their representative organizations in the development, implementation, and monitoring of disaster risk reduction and climate adaptation policies?

⁴⁴ Republic of Armenia, Ministry of Environment. (2020). Fourth national communication on climate change under the United Nations Framework Convention on Climate Change. Retrieved from https://unfccc.int/sites/default/files/resource/NC4_Armenia_.pdf

Article 15: Freedom from torture or cruel, inhuman, or degrading treatment or punishment

1. Institutional Settings

Persons with disabilities in Armenia face significant challenges, including high rates of violence and abuse, particularly in institutional settings. Despite the urgency of these issues, data on violence and torture disaggregated by disability and gender is unavailable, complicating efforts to address the problem effectively. Reports from NGOs, including Disability Rights Agenda, reveal alarming cases of violence against children with disabilities, including incidents of sexual violence. Children interviewed by these organizations highlighted persistent abuse, reflecting the vulnerability of individuals with disabilities in Armenia's care systems. Unfortunately, no proper investigations have been carried out to address these violations, further perpetuating a culture of impunity.

One egregious example occurred in early 2023 at the Vardenis Neuropsychological Care Home, where unauthorized physical restraint methods were systematically used against a resident.⁴⁵ Between October 2022 and February 2023, the resident was subjected to prolonged physical restraint, including being chained for over four hours daily, sometimes overnight. The metal chain was wrapped over fabric around the resident's abdomen and secured to a heating radiator. The resident's daily life was confined to a mattress on the floor, and they were either escorted to the restroom while chained or forced to meet their needs in the room.

Suggested questions:

1. What steps will Armenia take to establish mechanisms for collecting disaggregated data on torture against persons with disabilities, including by gender, to inform targeted interventions and policy reforms?

⁴⁵ "As Part of the Criminal Proceedings, the Director and 3 Employees of Vardenis Neuropsychological Care Institution Were Arrested," Investigative Committee of Armenia, June 9, 2023, available in Armenian, <https://www.investigative.am/news/qreakan-varouyti-shrjanakoum-dzerbakalvel-en-vardenisi-nyardahogebanakan-toun-internat-poak-i-tnoreny-ev-3-ashxatakicner>.

2. What measures will Armenia implement to eliminate unauthorized physical restraints and other inhuman practices in care institutions, ensuring compliance with Convention principles and human rights standards?
3. How will Armenia ensure prompt and impartial investigations into reported cases of torture in institutional settings, such as the Vardenis Neuropsychological Care Home, and hold perpetrators accountable?

2. Military Service

In 2024, the Armenian government introduced changes⁴⁶ to the list of health conditions determining suitability for military service, requiring individuals with nocturnal enuresis and some with "mild intellectual retardation" (as described by the government) to serve in limited military roles. Disability organizations have expressed⁴⁷ significant concerns about these changes, emphasizing the increased risks of stigma, discrimination, violence, and inhuman treatment faced by individuals with these conditions, particularly in the absence of proper legal guarantees. While the government justified the decision as a measure to combat document falsification, anti-corruption efforts should not come at the expense of individuals who already face substantial challenges in society.

Suggested question:

1. What measures will the government take to ensure that changes to military service suitability criteria do not discriminate against or harm persons with disabilities, including those not officially recognized as such, and how will it mitigate the risks of stigma, violence, and inhuman treatment in military environments?

⁴⁶ Republic of Armenia, Decree No. 534-N of the Government of the Republic of Armenia, Dated April 18, 2024, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=191958>.

⁴⁷ 4 NGO Statement on Changes in the List of Diseases that Determine the Degree of Fitness for Military Service, Disability Rights Agenda, available in Armenian, <https://dra.am/hy/articles/announcement/health-conditions-impacting-military-eligibility>.

Article 16: Freedom from exploitation, violence and abuse

Though domestic violence legislation has progressively improved in Armenia⁴⁸, shelters for domestic violence survivors remain largely inaccessible for individuals with disabilities. These shelters lack necessary features such as physical access, communication aids, and inclusive service provision, leaving persons with disabilities without adequate protection or support.⁴⁹ Despite the pressing need, the government has not taken sufficient steps to assist NGOs in making their facilities fully accessible, exacerbating the vulnerabilities of persons with disabilities and denying them the right to seek refuge and support in times of crisis.

Suggested question:

1. When will Armenia take concrete measures to ensure that shelters for domestic violence survivors are fully accessible to persons with disabilities, including features such as physical access, communication aids, and inclusive service provision?

⁴⁸ Anahit Chilingaryan, "Armenia Strengthens Domestic Violence Law: New Amendments Address Gaps in Protection, Accountability Measures," Human Rights Watch, April 18, 2024, <https://www.hrw.org/news/2024/04/18/armenia-strengthens-domestic-violence-law>.

⁴⁹ Challenges and Gaps in Armenia's Response to Domestic Violence, Coalition to Stop Violence against Women, Yerevan, 2020, https://womensupportcenter.org/DOMESTIC%20VIOLENCE_GAPS%20-ENGL.pdf.

Article 17: Protecting the integrity of the person

Medical sterilization in Armenia is a voluntary procedure that requires a citizen's written application as evidence of informed consent.⁵⁰ Voluntary sterilization is not permitted for individuals who are legally incapable, as their guardians, even though they can provide consent for other matters, cannot apply for sterilization on their behalf.⁵¹

Abortion or sterilization performed without prior, informed, and properly formulated consent, as well as forcing a person to undergo sterilization or abortion through violence, threats, blackmail, or coercion, is criminalized under law.⁵²

Despite existing legal protections, the Armenian government fails to collect disaggregated data on voluntary sterilization and abortion by disability and gender. Additionally, there is no data, including research data, on cases of genital mutilation against women and girls with disabilities.⁵³ This lack of comprehensive data significantly undermines efforts to monitor and address potential human rights violations effectively.

Moreover, the absence of detailed, standardized protocols and third-party oversight mechanisms further exacerbates the risk of non-consensual health interventions, particularly in psychiatric hospitals and care institutions."

Suggested questions:

⁵⁰ Republic of Armenia, Law on Human Reproductive Health and Reproductive Rights, Article 9, adopted December 11, 2002, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=195987>.

⁵¹ Republic of Armenia, Decree No. 425 of July 6, 1998, "On Approval of the Procedure for Implementing Medical Sterilization", available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=172605>.

⁵² Republic of Armenia, Criminal Code of Armenia, Articles 175 and 176, adopted May 5, 2021, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=199821>.

⁵³ Javier Truchero, in collaboration with Ana Urrutia and Lusine Sargsyan, Gap Analysis of Armenian Criminal Law in Light of the Standards Established by the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, Council of Europe, July 2017, 26, <https://rm.coe.int/gap-analysis-armenian-law-eng/168075bac2>.

1. When will Armenia establish mechanisms to collect disaggregated data on sterilization, abortion, and genital mutilation involving persons with and without disabilities?
2. What steps will Armenia take to train healthcare professionals, including those working in psychiatric hospitals and care institutions, on the rights of persons with disabilities to bodily autonomy and integrity, ensuring adherence to the principle of free and informed consent?

Article 18: Liberty of movement and nationality

Persons with disabilities in Armenia encounter numerous obstacles when trying to obtain passports. These challenges include physical inaccessibility of passport offices, long waiting lists⁵⁴ in 2024, and a lack of reasonable accommodations. Many passport offices are located in buildings that do not meet accessibility standards, making them impossible to access for individuals with mobility impairments. Additionally, the absence of alternative communication methods, such as sign language interpretation or easy-to-read formats, creates barriers for individuals with sensory or intellectual disabilities.

Bureaucratic procedures often fail to consider the specific needs of persons with disabilities, leading to delays, additional burdens, and frustration.

Furthermore, the system does not provide a flexible and easily accessible option for issuing passports at home for individuals who cannot visit passport offices due to inaccessible infrastructure.

Suggested questions:

1. What measures will Armenia take to ensure passport offices are fully accessible and provide reasonable accommodations, including alternative communication methods and streamlined procedures, for persons with disabilities?
2. How will Armenia implement flexible options, such as home visits, to issue passports to persons with disabilities and ensure accountability for accessibility and inclusivity in passport services?

⁵⁴ Nane Sahakyan, "'We Barely Manage.' There Are Queues in the Passport Departments of Yerevan, Citizens Complain," Azatutyun Radio Station, July 6, 2024, available in Armenian, <https://www.azatutyun.am/a/andznagrayin-bazhinneri-hertern-ou-goh-ev-dzhgoh-kaghakatsinery/33023605.html>.

Article 20: Personal mobility

Access to assistive technologies (ATs) in Armenia remains fraught with systemic challenges that undermine the rights of persons with disabilities to live independently and participate fully in society.⁵⁵ Despite the critical role that ATs play in enabling inclusion and autonomy, numerous barriers prevent persons with disabilities from obtaining the devices they need, ranging from restrictive policies and limited availability to inadequate government investment in innovative solutions.

One major issue arises from the implementation of the new disability assessment system. Under this system, individuals seeking an assistive device they have not previously received must undergo a reassessment of their disability status—even if they were previously granted permanent status without a deadline. This reassessment creates a serious risk of losing their recognized disability status, forcing individuals to choose between maintaining their status and obtaining the assistive technology they need. This policy places an undue burden on persons with disabilities, compelling them to weigh the risk of losing critical benefits against the potential benefits of access to necessary devices.⁵⁶

The government-provided list of assistive technologies is highly limited and fails to accommodate the diverse needs of persons with disabilities.⁵⁷ Furthermore, the absence of AT providers in many regions, particularly rural areas, creates significant barriers to access. Many individuals must travel long distances at considerable expense and inconvenience to obtain basic assistive devices, exacerbating inequalities between urban and rural populations.

⁵⁵ A Situation Assessment of Rehabilitation in Armenia, World Health Organization, 2024, <https://iris.who.int/bitstream/handle/10665/376953/WHO-EURO-2024-9294-49066-73155-eng.pdf?sequence=1>.

⁵⁶ "Announcement on the New Change in the Disability Assessment System," joint statement of NGOs and activists, July 1, 2024, <https://dra.am/articles/announcement/announcement-on-the-new-change-in-the-disability-assessment-system>.

⁵⁷ Republic of Armenia, Appendix No. 2 of the RA Government Decision No. 1004-N of June 27, 2024, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docID=194668>.

The situation is particularly dire for refugees with disabilities from Nagorno-Karabakh. During the initial phase of displacement, the government failed to provide these individuals with essential assistive devices, referring them instead to NGOs.⁵⁸

Another significant gap lies in the government's lack of investment in assistive technologies tailored to Armenian-speaking users. Devices such as Braille displays, speech-to-text systems, and other adaptive technologies commonly available in other linguistic contexts are not developed or adapted for use in Armenian. This omission severely restricts the ability of persons with disabilities to access education, employment, and other opportunities in their native language.

Moreover, the Armenian government has not taken sufficient steps to encourage the importation or development of specialized assistive technologies. These devices, often used by smaller groups of persons with disabilities, are not readily available due to their limited market potential in Armenia. The absence of government incentives, such as subsidies or tax breaks, discourages companies from investing in these essential but niche products.

Suggested questions:

1. What measures will Armenia take to expand the list of government-provided assistive technologies to meet the diverse needs of persons with disabilities, including those in rural areas and refugees from Nagorno-Karabakh?
2. What steps will Armenia take to invest in and develop assistive technologies tailored for Armenian-speaking users to ensure access to education, employment, and other opportunities?
3. How will Armenia eliminate the requirement for reassessment of disability status for individuals seeking new assistive devices, ensuring they do not risk losing their recognized disability status?

⁵⁸ Letter from the Press Secretary of the RA Minister of Labor and Social Affairs, November 15, 2023: "In order to quickly respond to the needs of persons forcibly displaced from Nagorno-Karabakh regarding the need for assistive products, the necessary information was collected during the period you mentioned through the Hotline of the Unified Social Service and the 'Primary Need Registration Platform' and was directed to partner organizations engaged in providing support measures cooperating with the state. In 2023, from September to October 16, the number of displaced persons who applied for assistive products was 94, 24 of them received through partner NGOs."

Articles 21: Freedom of expression and opinion, and access to information

Although the law “On the Rights of Persons with Disabilities” mandates that all government websites be accessible and requires the adoption of web accessibility standards, the government has not yet implemented such standards. This gap leaves individuals with disabilities facing significant barriers in accessing essential online information and services.

The digitalization of various government services frequently overlooks the needs of persons with disabilities, perpetuating the digital divide and creating barriers to equitable access. In 2024, key examples included the digitalization of disability assessment process⁵⁹, support programs for refugees from Nagorno-Karabakh⁶⁰, mandatory income declaration⁶¹, and the digital ticketing system in Yerevan's public transport network⁶². While these reforms with digital components were designed to impact a broad segment of the population, they suffered from critical shortcomings. The accessibility of web platforms was inadequate, awareness campaigns were insufficient, and accessible information about procedures and rights was not provided.

Additionally, the government has no mechanism to ensure that the information created and shared by different state bodies, including public announcements, documents, and digital content, is fully accessible to all, particularly persons with disabilities.⁶³

⁵⁹ Ministry of Labour and Social Affairs, Functionality Assessment Platform, where persons submit their applications and self-assessment information, available in Armenian, e-disability.am.

⁶⁰ Ministry of Labour and Social Affairs, Social Assistance Event to Assist Displaced People from Nagorno-Karabakh to Pay for Accommodation and Living Expenses, rent.socservice.am.

⁶¹ State Revenue Committee, Annual Declaration of a Natural Person, <https://www.src.am/am/getMenuContents/122>.

⁶² Yerevan Municipality, Yerevan Public Transport Unified Ticketing System, <https://transport.yerevan.am/>.

⁶³ Armenia Digital Ecosystem Country Assessment (DECA), USAID, May 2024, https://www.usaid.gov/sites/default/files/2024-07/USAID_DECA_Armenia.pdf.

Suggested questions:

1. When will Armenia adopt and enforce web accessibility standards, such as those aligned with the Web Content Accessibility Guidelines (WCAG), to ensure all government websites are accessible to persons with disabilities?
2. What steps will Armenia take to establish mechanisms and allocate sufficient resources to ensure that information created and shared by state bodies, in all formats, is fully accessible to persons with disabilities?

Article 24: Education

The Disability Rights Agenda welcomes the recent reforms in preschool education, particularly the significant increase in the number of children with disabilities included in preschool education over a short period.⁶⁴ Additionally, progress in the inclusion of children with disabilities into mainstream education and the development of new financing models for accessibility are noteworthy steps forward.

However, substantial challenges persist. Schools remain largely inaccessible, despite accessibility standards being established as early as 2006.⁶⁵ Furthermore, the construction of new kindergartens, schools, and non-formal educational facilities often neglects the diverse needs of all children, leaving many without appropriate access to education and opportunities for inclusion.

While schools may apply for funding to improve accessibility, there is no specialized body to provide them with necessary consultation or to monitor the process effectively.⁶⁶

Schools continue to be inaccessible, despite the accessibility standards set in 2006. The building of new kindergartens, schools, and non-formal educational facilities often fails to consider the needs of all, leaving many children without appropriate access.

The government's failure to close special schools that segregate children with disabilities, combined with the lack of support in mainstream schools, compels children from various regions to travel to Yerevan, where these specialized institutions are located. Separated from their families, these children receive an education that, while potentially more accessible, is often of compromised quality. Furthermore, there has been minimal progress in including students who are blind, deaf-blind, deaf, or hard of hearing in public education. The absence of educational interpreters for Armenian Sign

⁶⁴ Ministry of Education, Science, Culture and Sports of the Republic of Armenia, Report on the Progress of "The State Program for the Development of Education of the Republic of Armenia Until 2030" in 2023, available in Armenian, <https://escs.am/files/files/2024-04-01/65be0c23cac0b14400d7cf979164cf9c.pdf>.

⁶⁵ "Disability-inclusive Development" NGO, Accessibility of Public Schools: The Law in Practice, Yerevan, 2018, Available in Armenian, <https://transparency.am/files/publications/1547306001-0-256208.pdf?fbclid=IwAR3MiOnpvCkGNSsz0gkzxW-nAjvtpxWjy0j2vjn0PniiKWjxBVdF1ULIB5Q>.

⁶⁶ Republic of Armenia, Decree No. 1481-N of the RA Government of September 22, 2022, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=190047>.

Language significantly contributes to discrimination, particularly for students pursuing vocational or higher education, effectively denying them their right to inclusive education.

Despite the recognition within the disability rights law of the obligation for educational institutions to provide reasonable accommodations, and the presence of a specific government decree to this effect, universities and colleges consistently neglect to supply such accommodations for persons with disabilities. This failure is compounded by an absence of legal remedies and mechanisms to address these shortcomings, leaving those affected without avenues to seek redress for violations of their rights.⁶⁷

Suggested questions:

1. What measures will Armenia take to ensure all new and existing kindergartens, schools, and non-formal educational facilities comply with accessibility standards?
2. When will Armenia develop a timeline and actionable plan to close special schools and transition children with disabilities into inclusive mainstream educational settings?
3. What steps will Armenia take to ensure the inclusion of students who are blind, deaf-blind, deaf, or hard of hearing in public education, including the provision of Armenian Sign Language interpreters and other necessary accommodations?
4. How will Armenia ensure universities and colleges meet their legal obligations to provide reasonable accommodations for students with disabilities, and what mechanisms will be established to address non-compliance?

⁶⁷ Republic of Armenia, The Procedure for Providing Reasonable Accommodations for Universal Inclusion Has Been Established, August 16, 2022, available in Armenian, <https://escs.am/am/news/13529>.

Article 27: Work and employment

The Government of Armenia has failed to adequately address the issue of employment for persons with disabilities, as the employment programs have proven ineffective. Current programs frequently overlook the distinct requirements of persons with disabilities, while disability-specific programs often lack the required flexibility.

Moreover, between 2021 and 2022, there was a systemic cessation of state employment programs, purportedly for the purpose of evaluating their efficacy by the Government.⁶⁸ During a long period, no new programs were introduced instead of the stopped programs, which constituted a breach of the state's obligation under the Convention to promote equal employment opportunities for persons with disabilities.

Although the Law on Employment⁶⁹ includes special provisions mandating a 3% employment quota for persons with disabilities in state institutions and 1% for private companies with 100 or more employees, the government has not issued a necessary decree to operationalize these quotas, rendering the law ineffective.

As per an official communication from the Ministry⁷⁰, during the period from 2020 to the first half of 2023, a total of 3096 individuals were successfully employed through the annual employment programs. Regrettably, only 222 of these beneficiaries were persons with disabilities, accounting for a mere 7% of the total. It is also unclear whether these employment opportunities involved long-term contracts or merely temporary arrangements, raising further concerns about the sustainability and inclusivity of these programs.

During 2021, the Government of Armenia initiated a program⁷¹ to assist employers interested in hiring individuals who had acquired disabilities due to military operations.

⁶⁸ "Several employment assistance programs are no longer in operation", "Zhoghovurd" daily, information verified by Disability Rights Agenda NGO, available in Armenian: armtur.am/1221256

⁶⁹ Republic of Armenia, RA Law on Employment, adopted December 11, 2013, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=199715>.

⁷⁰ Official response of the Ministry of Labour and Social Affairs to the Disability Rights Agenda NGO, 21 July, 2023

⁷¹ Government of Armenia Decree N 460-L, April 1, 2021: "On Approving the Measure of Providing State Compensation to the Employer in the case of Employment of Ex-servicemen (or those considered equal)

The support offered was in the form of income tax deductions based on the employee's salary, which could amount to 100,000 drams per quarter. Additionally, a lump sum of up to 500,000 drams was available for reasonable accommodations if needed. A total of 463 individuals with disabilities and 375 employers sought counseling with the intention of participating in the program. Despite the program's potential, it ultimately only facilitated 1 employer in hiring an individual who had acquired disabilities due to military operations.⁷²

In February 2023, the government introduced a program⁷³ to assist employers in providing reasonable accommodations for employees with all kinds of disabilities. However, no employer applied for reimbursement for such accommodations under this program until July 15, 2023.

According to the Disability Rights Agenda, the main reason for the failure of these programs is the mandatory requirement for employers to announce job opportunities through the Unified Social Service. Consequently, employees with disabilities must also seek employment through the Unified Social Service to be eligible for program support. This restriction means that employers who hire individuals with disabilities outside the Unified Social Service system will not receive any assistance or support from the program.

On August 11, 2022, the Government approved a decree⁷⁴ concerning the provision of reasonable accommodations by employers and educational institutions. However, this decree falls short of full compliance with the Convention due to the elimination of criteria for determining what constitutes "reasonability." Additionally, the regulation contradicts the widely accepted flexible principle of "undue burden." According to the decree, "undue burden" is defined as a cost that exceeds 5% of the total expenditures

who have received an injury as a result of military operations and are recognized as persons with disabilities, Available in Armenia, <https://www.arlis.am/DocumentView.aspx?DocID=151281>

⁷² Official response of the Ministry of Labour and Social Affairs to the Disability Rights Agenda NGO, 26, July, 2022

⁷³ Government of the Armenia Decree N 242-L, February 23, 2023: "On Approving the Employment Promotion Measure", available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=174467>

⁷⁴ RA Government Decree N 1265-N, August 11, 2022: "On Establishing the Procedure for Providing Reasonable Accommodations", available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=167278>

of the workplace or educational institution. However, this fixed percentage can sometimes result in an exorbitant amount that could discourage employers and educational institutions from providing accommodations for persons with disabilities.

In 2021, the Ministry of Labor and Social Affairs of the Republic of Armenia rolled out the joint job search engine "Jobs without Borders"⁷⁵. Despite its promise, the platform has not been entirely successful in bridging the employment gap for individuals with disabilities due to its non-compliance with Web Content Accessibility Guidelines. Furthermore, the platform's inability to ensure a fully digital employment process mandates physical visits to USS centers, thereby presenting an additional hurdle for the job-seekers with disabilities.

Suggested questions:

1. What actions will Armenia take to ensure continuous and effective state employment programs for persons with disabilities, avoiding gaps that breach its obligations to promote equal employment opportunities?
2. When will Armenia ensure that job-seeking platforms comply with Web Content Accessibility Guidelines and support a fully digital employment process to eliminate barriers for job-seekers with disabilities?

⁷⁵ A platform of the Ministry of Labour and Social Affairs for job seekers and employers, available in Armenian, workforall.am

Article 28: Adequate standard of living and social protection

1. Housing

Armenia's social housing policies are outdated and do not adequately address the specific needs of persons with disabilities. The absence of a targeted framework hinders the implementation of effective strategies to promote accessible housing solutions and exacerbates the issues of institutionalization and segregation.

Although some housing programs have been implemented, many residential buildings, including those funded by the government, are not designed with accessibility in mind.⁷⁶

Currently, there are no financial assistance programs available for housing adaptations, placing a significant burden on families of persons with disabilities. This lack of support makes it challenging for these families to create a fully accessible living environment.

On October 28, 2021, the Armenian government adopted a decision that discriminatorily excluded a significant number of graduates with disabilities from orphanages from benefiting from the "Provision of Housing for Graduates of the Orphanage of the Republic of Armenia" initiative. This decision stipulates that "beneficiaries without self-supporting abilities" are not entitled to receive certificates for apartment purchases, undermining their rights to adequate housing solely based on their disability.⁷⁷

For refugees from Nagorno-Karabakh, the government has prioritized families of persons with disabilities; however, no additional support is provided to help them find or construct accessible homes.⁷⁸ Many refugees are unable to utilize this program due

⁷⁶ Prime Minister of Armenia, "The Prime Minister Gets Acquainted with the Progress of Programs Implemented in Different Communities in Syunik Province," August 18, 2023, <https://primeminister.am/en/press-release/item/2023/08/18/Nikol-Pashinyan-visit-to-Syunik-Marz/>.

⁷⁷ Disability Rights Agenda, "Joint Statement on Disability-Based Discrimination Against Orphanage Graduates," November 15, 2021, <https://dra.am/articles/announcement/joint-statement-on-discrimination-against-graduates>.

⁷⁸ State Assistance Program, "State Assistance Program for Housing Provision of Families Displaced from Nagorno-Karabakh," n.d., <https://irazekum.am/event/view/193>.

to restrictive citizenship adoption criteria, limiting access to these opportunities and resulting in a very small number of beneficiaries.⁷⁹

In 2022, the government allocated a land plot in Balahovit village, Kotayk region, to the "Soldier's Home" charitable foundation. The project aims to create a residential village for war veterans with physical disabilities. It includes plans for eight single-story houses, one two-story accommodation facility, and a sports hall tailored for persons with disabilities. Despite criticism from some organizations of persons with disabilities, the government maintained its support for the initiative.

Homelessness among persons with disabilities, including those with psychosocial disabilities, is increasing in Armenia due to the shortage of affordable and accessible housing. At present, there is only one shelter available for homeless individuals, but it is poorly equipped to address the needs of persons with disabilities and excludes persons with psychosocial disabilities.⁸⁰

Foreign citizens who apply for refugee status and asylum from Armenia can temporarily live in a special shelter.⁸¹ The shelter functions under the subordination of the Migration Service and is not accessible. In case of impossibility of accommodation in the shelter, they are provided with financial assistance to cover their housing needs: AMD 20,000 (about \$50), which is not even enough to rent a room in Yerevan.⁸² This causes hostels with small rooms to become overpopulated and dangerous in case of emergencies.⁸³ In 2024, the Disability Rights Agenda documented two cases of

⁷⁹ CivilNet, "285 Families from Artsakh Applied to Use the Housing Program," July 23, 2024, available in Armenian, <https://www.civilnet.am/news/789388/բնակարանային-ծրագրից-օգտվելու-համար-արցախցի-285-ընտանիք-է-դիմել/>.

⁸⁰ Media Factory, "Homeless Shelter from the Inside: Unresolved Problems for Years," August 15, 2023, Available in Armenian, <https://mediafactory.am/our-products/homeless-shelter>.

⁸¹ Reception Center (Temporary Accommodation), UNHCR, <https://help.unhcr.org/armenia/seeking-asylum-in-armenia/reception-center/>.

⁸² Nare Petrosyan, "Armenia Providing Asylum: The Number of Applicants for International Protection Has Increased," August 21, 2023, Hetq, Available in Armenian, <https://hetq.am/hy/article/159218>.

⁸³ Luise Glum and Hayk Makiyan, "Indian Migrants: The Armenian Dream," February 22, 2024, Hetq, <https://hetq.am/en/article/164493>.

homelessness among asylum seekers with physical disabilities due to inadequate housing support.

Suggested questions:

1. What measures will Armenia take to introduce financial assistance programs for housing adaptations to ensure persons with disabilities and their families can create fully accessible living environments?
2. How will Armenia address the discriminatory exclusion of graduates with disabilities from orphanages under the "Provision of Housing for Graduates of the Orphanage of the Republic of Armenia" initiative to ensure equal access to adequate housing?
3. What steps will Armenia take to provide additional support to refugees with disabilities, including assistance in finding or constructing accessible housing and addressing restrictive citizenship adoption criteria?
4. How will Armenia ensure the availability of affordable, accessible, and adequately equipped shelters for homeless persons with disabilities, including those with psychosocial disabilities?
5. What measures will Armenia take to ensure that housing projects, such as the planned residential village in Balahovit for war veterans with disabilities, align with the principles of the Convention, particularly avoiding segregation and promoting community inclusion?

2. Disability Benefits

In Armenia, disability benefits are provided to persons officially recognized as having a disability. These benefits offer basic financial support, with fixed amounts determined by the "degree of functional limitation."⁸⁴ Individuals with a complete level of functional limitation receive 39,000 AMD (approximately \$100 USD), those with a severe level receive 37,500 AMD (approximately \$96 USD), and individuals with a moderate level receive 36,000 AMD (approximately \$92 USD). Children with disabilities are entitled to

⁸⁴ Republic of Armenia, Law on State Allowances, accepted December 12, 2013, <https://www.arlis.am/documentview.aspx?docid=199737>.

39,000 AMD (approximately \$100 USD) regardless of their degree of functional limitation.⁸⁵

For individuals with work experience, an additional increment is added to the base amount for each year of documented work, recognizing their contributions while still addressing their financial needs.⁸⁶

In 2024, the monthly cost of the food basket in Armenia was 34,580.6 AMD (approximately \$88 USD), and the minimum consumer basket, which includes food and non-food essentials, was 63,974.1 AMD (approximately \$163 USD), based on World Bank methodology.⁸⁷ Although the base amount of disability benefits may cover the cost of the food basket, they fall far short of the minimum consumer basket, leaving persons with disabilities unable to meet basic living standards.

Persons with disabilities encounter further challenges upon becoming eligible for old-age pensions, as they are required to choose between receiving either old-age benefits or disability benefits, meaning they can only access one form of support. This often results in financial disadvantages, as neither benefit alone is sufficient to meet their comprehensive needs. This highlights the absence of a comprehensive approach to addressing the financial needs of older persons with disabilities.

Moreover, persons with disabilities or older persons living in state-run care institutions are excluded from receiving disability or old-age benefits. Instead, they receive only the additional amounts calculated based on their prior work experience, as applicable under the disability or old-age benefits system. The only exception is for children in such institutions, who receive 50% of the benefit in cases of losing a breadwinner. This policy disproportionately affects institutionalized individuals, denying them financial autonomy and increasing their dependence on the state.

⁸⁵ Republic of Armenia, Decree No. 1489 of December 26, 2013 on Determining the Sizes of Allowances in Case of Old Age, Disability, Losing the Feeder, and Burial Benefits, <https://www.arlis.am/documentview.aspx?docid=179721>.

⁸⁶ Republic of Armenia, Law on State Pensions, accepted December 22, 2010, <https://www.arlis.am/documentview.aspx?docid=199713>.

⁸⁷ Socio-Economic Situation of RA, January-September 2024, annex 2, Armenian and Russian, Armenian National Statistical Service, <https://armstat.am/am/?nid=82&id=2692>.

The government has failed to ensure that all persons with disabilities receive equitable and adequate benefits, regardless of the "cause" of their disability.

Another issue may emerge years later, when the new pension system becomes fully operational. Currently, employees born on or after January 1, 1974, along with those who voluntarily join the system, contribute to their pensions through social payments deducted from their salaries. However, many persons with disabilities encounter significant barriers to employment, including inaccessible workplaces, discrimination, and a lack of accommodations, which hinder their ability to participate in the labor market and accumulate the required contributions.

Suggested questions:

1. What steps will Armenia take to ensure that disability benefits are increased to adequately cover the minimum consumer basket, aligning with the principle of providing an adequate standard of living for all persons with disabilities?
2. What steps will the government take to eliminate the requirement for older persons with disabilities to choose between old-age benefits and disability benefits, and to ensure they receive adequate and comprehensive financial support that reflects their needs?
3. What measures will the government take to ensure that persons with disabilities can access the labor market and accumulate sufficient pension contributions under the new system?

3. Social Assistance

The government, with support of international partners, has developed and adopted a new law "On Social Assistance".⁸⁸ According to the law, the provision of care services may be refused if a person "has been diagnosed with a disease that can be treated only in the relevant medical institutions." However, there is no exhaustive list of diseases that fall under this category, leaving significant room for subjective interpretation and potential misuse. Additionally, the law allows the government to approve a "list of diseases that are grounds for refusing care." As of 2025, this list includes chronic alcoholism or drug addiction, infectious skin diseases such as scabies

⁸⁸ Republic of Armenia, RA Law "On Social Assistance", accepted October 24, 2024, <https://www.arlis.am/DocumentView.aspx?docid=199657>.

and lice, and diseases “posing a threat to the environment”, excluding HIV and non-microbial tuberculosis.

These provisions reflect outdated and discriminatory practices that fail to align with the human rights-based model of disability enshrined in the Convention. The government refused recommendations from the Disability Rights Agenda to remove these discriminatory policies and align with the Convention, continuing to create barriers to dignity for persons with disabilities.

Suggested question:

1. What steps will the government take to remove discriminatory provisions in the law "On Social Assistance" that allow the refusal of care services based on outdated and stigmatizing lists of diseases, and how will it ensure alignment with the human rights-based approach of the Convention?

4. Poverty Reduction

The amended Law "On State Allowances" (2024) establishes a system for calculating the basic monthly amount of the insecurity allowance based on family income and composition. This amount is determined by calculating the difference between the marginal threshold entitling a family to receive the insecurity allowance and the monthly income of one calculated family member, adjusted by the number of family members. The parameters for these calculations are set annually by the Government of the Republic of Armenia.

Families may also receive a supplement based on their assigned dependency group, as determined by the government. Dependent family members include individuals under 18 years of age, persons with disabilities (with severe or complete levels of functional limitation), individuals aged 75 or older, and others as specified by governmental decisions. “Able-bodied” members are defined as individuals aged 18 to 62 who do not have disability (severe or complete levels of functional limitations).

This reform continues to associate disability with "inability to work" in the context of insecurity allowances. This outdated approach perpetuates stigma, reinforces a medicalized view of disability, and fails to align with the human rights-based approach.

Another issue is the practice of income imputation under the amended law, which states that family members who are able to work but are not employed are credited with income. This imputed income is calculated and applied to the family member, regardless of whether they actually receive it. Such a provision can unfairly penalize families by reducing their eligibility for social allowances, particularly in cases where individuals face barriers to employment, such as caregiving responsibilities, discrimination, or a lack of accessible workplaces.

Furthermore, the new system considers disability benefits as part of the calculation of family income for social assistance.⁸⁹ By including these benefits in the household income assessment, the system artificially inflates the family's financial status, potentially disqualifying them from other essential insecurity allowances.

Finally, the new system has not undergone a detailed disability impact assessment to evaluate its effects on the rights of persons with disabilities, particularly those living in poverty.

Suggested questions:

1. What measures will the government take to reform the amended Law "On State Allowances" to eliminate the association of disability with "inability to work" and ensure that the system aligns with the human rights-based approach outlined in the Convention?
2. How does the government plan to address the issue of income imputation, which penalizes families with members unable to work due to caregiving responsibilities, discrimination, or lack of accessibility, and ensure that allowances reflect the actual income and needs of these families?
3. Why has the new system under the amended Law "On State Allowances" not undergone a detailed regulatory impact assessment, and what steps will the government take to evaluate its impact on the rights of persons with disabilities, particularly those living in poverty?

⁸⁹ Republic of Armenia, Appendix 1, Point 32 of the RA Government's Decree No. 27-N of January 9, 2025, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=202013>.

Article 29: Participation in political and public life

Politics and media in Armenia are highly polarized, creating an environment where politicians with disabilities are often targeted and stigmatized, discouraging their involvement.

Political parties are not inclusive and do not actively encourage the participation of persons with disabilities. They fail to provide necessary accessibility measures or reasonable accommodations for their members with disabilities, further marginalizing this group.

Moreover, politicians frequently use disability-related terms as derogatory remarks against one another, perpetuating stigma and negative stereotypes. This toxic political culture not only alienates persons with disabilities but also undermines the principles of equality and respect enshrined in the Convention.

The government in Armenia has yet to establish a supportive ecosystem for organizations of persons with disabilities, falling short of its obligations under the Convention. Coherent strategies and accessible funding mechanisms to empower advocacy organizations remain absent. Many disability organizations, functioning primarily as service providers with government support, encounter significant challenges. Their reliance on state funding constrains their ability to openly criticize the government, as doing so risks the loss of essential resources. Additionally, limited budgets further exacerbate these issues, hindering their capacity to sustain independent and effective advocacy efforts.

Suggested questions:

1. What measures will Armenia take to ensure political parties and institutions provide accessibility measures and reasonable accommodations to encourage the participation of persons with disabilities in political life?
2. How will Armenia address the use of disability-related terms as derogatory remarks in political discourse, and what steps will be taken to promote respectful and inclusive language in media and politics?
3. What steps will Armenia take to establish coherent strategies and accessible funding mechanisms to empower organizations of persons with disabilities, ensuring their independence and ability to engage in effective advocacy, including the freedom to criticize government policies?

Article 31: Statistics and data collection

DRA welcomes the use of the Washington Group set of questions in Armenia's census. However, a special analysis report on disabilities based on this data has not been published.⁹⁰

Statistical reforms have not been prioritized as part of broader government management reforms.⁹¹ As a result, statistical data related to persons with disabilities remains fragmented and often inconsistent, with administrative data sources frequently differing from one another.

While data on persons with disabilities is often collected, it is not consistently published, making it difficult for local communities to access and use this information to understand their populations.

Disaggregation of data remains a persistent challenge across different areas affecting persons with disabilities, including health, access to services, employment opportunities, and the risk of poverty and hardship.

Suggested question:

1. What steps will Armenia take to improve the collection, publication, and analysis of disability-related data, including harmonizing administrative data sources, ensuring systematic disaggregation across key areas, and making the data accessible to stakeholders?

⁹⁰ The Main Results of RA Census 2022, Chapter 9. Disability Status of Population, Armenian National Statistical Service, <https://armstat.am/en/?nid=82&id=2623>.

⁹¹ Republic of Armenia, Decision No. 691-L of May 13, 2022 on the Adoption of the Public Administration Reform Strategy, Road Map, and Result Framework for 2023-2025, Available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=181462>.

Article 32: International cooperation

International development programs in Armenia often fail to ensure the meaningful participation and involvement of organizations of persons with disabilities. Frequently, these programs are perceived as less transparent by local communities, further eroding trust and reducing their overall effectiveness. OPDs are consistently sidelined during the design, implementation, and evaluation phases of such programs, despite their essential role in ensuring that development efforts are disability-inclusive and aligned with the Convention.

The Armenian government's coordination of international cooperation remains inadequate, with limited mechanisms to align these efforts with disability-inclusive development goals. In some instances, the government fails to request support at appropriate stages⁹² or within timelines that allow for the meaningful involvement of OPDs. This lack of strategic coordination has led to missed opportunities to address the real needs of persons with disabilities effectively.

Alarmingly, there are instances where international cooperation has been used to support care institutions and special schools and promote segregation of persons with disabilities. Such practices directly contradict the Convention, particularly the principles of deinstitutionalization and community-based services. By reinforcing harmful systems of care, these actions undermine the dignity and rights of persons with disabilities and stall progress toward their full inclusion in society.

To mitigate these risks and address existing gaps, the government should actively encourage all actors, including embassies and international organizations, to establish formal cooperation mechanisms with OPDs. The Disability Rights Agenda welcomes the establishment of the UN Country Team and the OPD Coordination Mechanism in 2024 as a significant step forward.⁹³ This initiative provides a structured platform for dialogue and collaboration between OPDs and UN agencies, setting a precedent for inclusive and transparent international cooperation.

⁹² Artak Khulyan, "Armenia Expects International Support to Eliminate the Consequences of the Flood," Azatutyun, June 6, 2024, Available in Armenian, <https://www.azatutyun.am/a/armenia-expects-international-support-to-eliminate-the-consequences-of-the-flood/32981781.html>.

⁹³ UN Armenia, "Dec 4, 2024," X, <https://x.com/UNArmenia/status/1864274872110547256?mx=2>.

Suggested questions:

1. What steps will Armenia take to ensure the meaningful participation of organizations of persons with disabilities in the design, implementation, and evaluation of international development programs, aligning these efforts with the Convention?
2. What measures will Armenia implement to prevent international cooperation from supporting care institutions or practices that promote the segregation of persons with disabilities, ensuring compliance with the principles of deinstitutionalization and community-based services?
3. How will Armenia encourage embassies, international organizations, and other actors to establish formal cooperation mechanisms with OPDs, building on initiatives like the UN Country Team and OPD Coordination Mechanism?

Article 33: Implementation and monitoring

In Armenia, the Ministry of Labor and Social Affairs (MoLSA) has been designated as the focal point for matters relating to the implementation of the Convention.⁹⁴ However, in practice, the Ministry lacks the capacity and authority to effectively coordinate actions across other sectors and levels of government. MoLSA holds the same legal status as other ministries, which limits its ability to enforce or oversee the implementation of disability-related measures in areas outside its direct purview, such as health, education, or transportation. This fragmentation significantly hampers comprehensive implementation of the Convention.

Although a formal consultation mechanism has been established by government decree since 2006 to facilitate dialogue with organizations in the field, this mechanism is not functioning as intended.⁹⁵ Meetings are not held periodically, as required by the decree, and the platform remains underutilized. This mechanism, which consists of equal representation from government and non-governmental organizations, has the authority to discuss claims raised by NGOs and citizens and adopt consultative decisions. These decisions serve as recommendations or guidance rather than legally binding resolutions, aimed at influencing policies or practices by providing expert advice or expressing collective viewpoints. However, in practice, it fails to operate effectively. The lack of regular engagement and follow-through on decisions undermines its potential to serve as a meaningful forum for advancing the rights of persons with disabilities.

The Parliament has appointed the Human Rights Defender (Ombudsperson) as the independent monitoring mechanism for the implementation of the Convention.⁹⁶ The

⁹⁴ Consideration of Reports Submitted by States Parties under Article 35 of the Convention: Initial Report of State Party Due in 2012, Armenia, CRPD/C/ARM/1, paragraph 332, <https://documents.un.org/doc/undoc/gen/g15/062/73/pdf/g1506273.pdf>.

⁹⁵ Republic of Armenia, Prime Minister Decision No. 98 of February 25, 2008, Procedures of the National Commission Dealing with Issues of People with Disabilities, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=197606>.

⁹⁶ Republic of Armenia, Constitutional Law of RA "On the Defender of Human Rights" on Amendments and Changes to RA Constitutional Law, accepted June 13, 2018, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=123440>.

decision was made without adequate consultation or meaningful participation of organizations of persons with disabilities.

Additionally, there exists a misconception that a single mechanism can adequately address all aspects of Convention monitoring. Both the government and the Human Rights Defender's office have resisted the establishment of additional monitoring mechanisms, such as specialized monitoring frameworks for accessibility.

Suggested questions:

1. What steps will Armenia take to enhance the capacity and authority of the focal point to effectively coordinate Convention implementation across all sectors and levels of government?
2. How will Armenia ensure the formal consultation mechanism established by government decree operates effectively, including holding regular meetings and ensuring the implementation of decisions to advance the rights of persons with disabilities?
3. How will Armenia address gaps in Convention monitoring by establishing additional specialized mechanisms to complement the role of the Human Rights Defender and ensure comprehensive monitoring?