

**International
Disability
Alliance**

**Political participation and OPD leadership
under CRPD General Comment No 11:**

*Analysis and practical advocacy guide for
organisations of persons with disabilities*

23 September 2026

Introduction

General Comment No. 11 explains political participation as a right to exercise political agency and influence public affairs on an equal basis with others. Its implications extend across electoral law, government administration, public budgets, political parties, civic organisations and international cooperation. Compliance requires the removal of disability-based exclusions, accessible institutions, support that respects individual choice, and effective opportunities for persons with disabilities and their representative organisations to shape decisions. A formally available right that cannot be exercised in practice is insufficient. (GC11, paras. 1, 7–11, 14, 32–35 and 49.)

For organisations of persons with disabilities, the central advance is the integrated treatment of self-representation, influence, resources and independence. States must enable OPDs to function sustainably as independent representative interlocutors. Funding mechanisms must be equitable, accessible, transparent and proportionate, including for small grassroots, self-advocacy and peer-led groups. Public or private support must preserve OPDs' control over their governance and advocacy positions. These propositions provide a strong basis for challenging consultation arrangements that depend on unpaid labour, exclude less-resourced constituencies or reward agreement with government. (GC11, paras. 42–45, 50, 53 and 68–71.)

OPDs can use the General Comment to secure legislative reform, influence ordinary policy and budget processes, negotiate sustainable funding arrangements and demand accountability for exclusion. The OPD advocacy toolkit outlined in part provides some ideas for adaptable steps for this work. (GC11, paras. 46, 51, 66–74.)

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Part One Legal meaning and substantive rights

1. The legal authority of the General Comment

The Convention and its interpretation

The binding international obligations arise from the CRPD for States parties. A General Comment is the Committee's authoritative expert interpretation of those obligations; GC11 itself describes its purpose as clarifying the content of article 29 and the duties to respect, protect and fulfil it. It gives governments, courts, electoral authorities and OPDs a detailed interpretive framework against which to assess law and practice. (CRPD, arts. 29, 34 and 39; GC11, paras. 9 and 49.)

In domestic advocacy or litigation, identify both the substantive CRPD obligation and the relevant national legal route. Whether a court can apply the Convention directly, use it to interpret legislation or review an administrative decision depends on the domestic legal system. GC11 supplies persuasive interpretive content but does not itself resolve standing, jurisdiction, filing deadlines or the availability of a particular remedy. Those questions should be addressed alongside the argument that the State must provide effective, accessible accountability. (GC11, paras. 51, 72 and 74.)

The General Comment should be read as an integrated interpretation. Article 29 protects electoral participation and wider public and associative life; articles 4(3) and 33(3) establish participatory obligations in implementation and monitoring. Equality, accessibility, legal capacity, information, privacy, independent living and international cooperation help define what effective participation requires. Selecting only the voting provisions would miss much of its legal and practical significance. (GC11, paras. 6, 11, 32, 42, 46 and 53–65.)

Equality and the limits of general eligibility rules

GC11 refers to the wider international and regional framework for political rights, including the requirement that conditions on the exercise of political rights be objective and reasonable. It simultaneously states that article 29 contains no limitation clause permitting disability-based restrictions and rejects individual assessments of political competence. General references to electoral integrity or eligibility cannot be used to reintroduce the disability discrimination that paragraphs 16 and 17 prohibit. (GC11, paras. 12–17.)

This does not mean that GC11 abolishes every generally applicable electoral rule or creates identical electoral entitlements for all persons irrespective of age or citizenship. Its central requirement is equality without disability-based exclusion. The validity of a particular age, nationality, residence or other general requirement requires analysis under the applicable legal framework, including whether its design or operation discriminates against persons with disabilities. Wider participation in public affairs must also be distinguished from eligibility to vote in a particular election. The text expressly protects age-appropriate civic engagement by children and young persons and addresses barriers affecting migrants, refugees, displaced and stateless persons. (GC11, paras. 5, 12, 16, 32 and 54.)

Immediate duties and implementation planning

Paragraph 27 expressly identifies the duties it sets out as immediately applicable. These include removing disability-based restrictions, safeguarding freely chosen assistance and ballot secrecy, addressing intimidation, and providing the accommodation and technologies necessary for public functions. Paragraph 17 requires restoration of rights without undue delay. A government cannot make equality contingent on a future capacity assessment, the completion of a pilot project or the next electoral reform cycle. (GC11, paras. 17 and 27.)

Implementation may require sequenced procurement, building works, institutional reforms and budget decisions. A timetable can organise those tasks but cannot suspend current non-discrimination duties or excuse an inaccessible election. Paragraphs 22, 57, 67 and 70 require resourced standards, responsibilities, timeframes and enforcement. The appropriate advocacy response is to seek both immediate measures enabling participation and a funded programme to remove the underlying barriers. A temporary arrangement must preserve choice and must not become a reason to leave ordinary systems inaccessible. (GC11, paras. 21–22, 27, 54, 57 and 67–70.)

CRPD article 4(2) addresses progressive realisation of economic, social and cultural rights while preserving immediately applicable obligations. It should not be treated as a general resource exception to political rights. GC11 recognises the resources necessary for participation and requires States to plan and provide them. For OPD funding, it supports a concrete demand for adequate, sustainable and equitable arrangements; it does not prescribe a universal funding percentage, an automatic grant to every applicant or a single global funding model. (CRPD, art. 4(2); GC11, paras. 22, 50, 67 and 69–71.)

2. Equal legal capacity and the restoration of political rights

No disability based tests of political competence

The Committee rejects exclusions based on diagnosis, actual or perceived impairment, guardianship, legal capacity status or an assessment of a person's capacity to exercise political rights. Replacing a blanket prohibition with an individual judicial or medical assessment does not cure the discrimination. The right belongs to the person, and institutional assumptions about their understanding or decision-making ability cannot determine whether it exists. This is especially important for persons with intellectual or psychosocial disabilities and people requiring more intensive support. (GC11, paras. 10–11, 16–17 and 59.)

A legal analysis must therefore go beyond the electoral statute. Constitutional provisions, civil codes, guardianship decisions, mental health laws, voter registration databases and administrative instructions can all reproduce exclusion. For example, formally repealing a guardianship-related voting ban will have little effect if the electoral register continues to exclude everyone previously disqualified. The Committee calls for comprehensive review of

the interconnected legal framework and for restoration without an application, reassessment or capacity review. (GC11, paras. 4, 16–17 and 66.)

Recommended implementation measures include identifying and cancelling disability-related disqualification codes, correcting electoral registers, notifying affected voters in accessible formats, training registration officials and providing an urgent correction procedure. These are operational means of fulfilling paragraph 17, rather than an exhaustive list expressly prescribed there. Ordinary identity checks must themselves be accessible and cannot function as disguised competence assessments. (GC11, paras. 17, 18, 22, 48 and 74.)

Support must preserve the person as decision maker

Support and legal capacity must be understood together. Needing communication assistance, Easy Read information, a trusted support person or additional time does not weaken a person's entitlement to participate. The legal question is whether support enables the person's own will and preferences, rather than substituting someone else's judgment. The same principle applies when a person votes, contributes to a consultation, holds office or participates in an OPD. (GC11, paras. 28–31, 37, 47 and 59.)

A family member, guardian, service provider, party representative or OPD officer cannot cast the vote they consider best for the person. Where communication is difficult, the response must be to improve accessible information and individual communication support. Paragraph 31 does not authorise an assistant to reinterpret or replace the voter's choice. No ballot should be attributed to a person solely because a supporter believes it reflects that person's interests. This safeguard must not be turned into a new test excluding people who communicate differently. (GC11, paras. 16, 28–31 and 59.)

3. Accessible elections throughout the electoral cycle

Accessibility and reasonable accommodation

Accessibility is an anticipatory duty concerning systems, environments and procedures. Authorities must plan for diverse users before an individual encounters a barrier. Reasonable accommodation concerns necessary and appropriate changes required in a particular case. Both duties apply: a broadly accessible system may still require an individual adjustment, while providing an adjustment does not cure a failure to establish accessible ordinary procedures. (GC11, paras. 18–22, 37, 47, 54, 57 and 70.)

The CRPD definition of reasonable accommodation includes the qualification that an adjustment must not impose a disproportionate or undue burden. That definition must be read together with GC11's requirements that accommodation be prompt and without cost to the individual. It does not provide a general exemption from systemic accessibility. A bare statement that no budget exists is insufficient to explain whether an individual accommodation is reasonable; authorities should identify the requirement, assess effective options and explain any refusal through an accessible process subject to review. The

recommendation to document that assessment follows from the duties of accountability and effective remedy. (CRPD, arts. 2 and 5(3); GC11, paras. 37, 54, 57 and 74.)

The complete voting journey

The obligation extends from obtaining information and registering to vote through casting a secret ballot and challenging interference. A ramp at the polling station is insufficient if registration is inaccessible, the ballot cannot be understood, information is unavailable in national sign languages or the complaint process cannot be used. Paragraph 22 requires binding standards covering all components, levels of government and voting modalities, backed by resources, independent assessments, enforcement and remedies. (GC11, paras. 18–22 and 74.)

OPDs should examine the cumulative effect of each stage. A person may face transport costs, inaccessible identification requirements, a difficult registration platform, poorly trained officials and an unusable ballot. Each barrier can prevent participation, even if other stages are accessible. Independent assessments should occur early enough to correct the problems and verify compliance before polling. Training should address communication, accommodation, legal capacity, confidentiality and assistance, with OPDs actively involved in design and review. (GC11, paras. 4, 18–22, 31 and 70.)

Information must be accessible in practice, including through national sign languages, Easy Read, plain language, Braille, large print, captioning and other communication methods where required. Providing an accessible version after the public debate or registration deadline defeats its purpose. Paragraph 62 requires accessible information at the same time and through the same channels as information for the general public. OPDs can test actual usability with different constituencies and document the consequences of delay. (GC11, paras. 19, 47 and 62.)

Alternative voting methods

Advance voting, accessible postal voting, mobile polling, voting at home and, subject to safeguards, remote electronic voting may help meet requirements ordinary procedures cannot meet. They must remain freely chosen, protect secrecy and autonomy, and avoid coercion, surveillance, segregation and restrictions on electoral choice. The availability of a special voting method cannot justify excluding persons with disabilities from ordinary polling stations or requiring them to use a separate channel. (GC11, para. 21.)

The Committee does not endorse remote electronic voting without qualification. Accessibility, security, secrecy and electoral integrity must all be addressed. A proposal should explain how voters can express their own choice, obtain chosen support, avoid third-party scrutiny, and access an effective alternative if the technology fails. Accessibility cannot be traded away for administrative convenience, and a technology advertised as accessible must be independently assessed in practice. (GC11, paras. 20–23 and 48.)

4. Ballot secrecy and freely chosen assistance

Confidentiality without isolation

Persons with disabilities must be able to vote without intimidation and without a vote becoming traceable or verifiable by third parties. Voting arrangements must protect them from coercion in families, intimate relationships, support arrangements, institutions and digital environments. The existence of assistance does not remove the State's responsibility to protect confidentiality. Equally, the protection of secrecy cannot justify denying a voter the assistant they freely choose. (GC11, paras. 23 and 25–31.)

Chosen assistance necessarily involves a trusted person helping communicate or implement the voter's instruction. The relevant distinction is between confidential assistance controlled by the voter and an arrangement that enables others to demand proof of a vote, inspect it afterwards or control its content. Electoral authorities should provide confidential procedures and enforceable duties for assistants, while maintaining accessible options for voters who wish to vote without assistance. (GC11, paras. 23, 27–28 and 31.)

Safeguards against substituted or coerced voting

Paragraph 31 requires clear and enforceable assisted-voting standards, confidentiality, non-interference, accountability and prohibition of group or staff-controlled voting. An institution's practice of organising residents' votes as a block cannot be legitimised by describing it as support. Nor should an authority impose a staff member as the default assistant merely because that arrangement is easier to administer. Assistance must be requested and provided by a person of the voter's choice. (GC11, paras. 27–31.)

Recommended safeguards include private confirmation of whether assistance is wanted, accessible explanations of the assistant's role, a way to change or decline an assistant, trained independent oversight and a confidential complaint route. Monitoring should record barriers and coercive practices without collecting how individuals voted. Rules should prevent abuse while avoiding new obstacles, such as unnecessary medical certificates or intrusive questioning about a voter's understanding. (GC11, paras. 16, 27, 31, 63 and 74.)

5. Candidacy public office and political organisations

Effective opportunity to seek and exercise office

The right to be elected includes an effective opportunity to stand, assume office and exercise public functions. Formal eligibility is insufficient where inaccessible nomination procedures, campaign environments or parliamentary systems make the role impracticable. Elected representatives must have the authority, information, communication support, technologies and accommodation needed to perform the same substantive functions as others. (GC11, paras. 14, 23–27.)

Support should cover the whole progression from nomination to service in office. Practical measures can include accessible nomination forms and debates, accessible constituency meetings, communication assistance, research support and usable legislative documents. Disability-related campaign costs should be publicly funded or excluded from ordinary spending limits. Disability-related benefits, personal assistance, health coverage and other support required because of disability should not be reduced or withdrawn solely because the person receives income from public office. Paragraph 71 should be cited accurately: it does not prescribe a universal exemption from every generally applicable tax or benefit rule. (GC11, paras. 24–27 and 71.)

Persons with disabilities must also have equal opportunities to serve as electoral officials, polling staff and observers. Accessible recruitment and accreditation, training, accommodation and support are therefore part of the equality obligation. OPDs can advocate for paid professional roles and meaningful decision-making responsibilities, alongside opportunities to observe and scrutinise elections. (GC11, para. 24.)

Participation within parties and civil society

Participation in political parties and civic associations includes internal elections, nominations, leadership, administration and strategic decisions. A party does not fulfil the standard by creating a disability advisory group whose members cannot influence candidate selection or core policy. Neutral-looking membership fees, meeting practices or procedural rules may also exclude disproportionately. States must establish and enforce a framework of accessibility, equality and non-discrimination, including effective remedies for discriminatory internal practices. (GC11, paras. 38–41 and 74.)

OPDs should be able to engage across political perspectives without being absorbed into a party or losing independent representation. Their members retain their own political choices. A recommended organisational safeguard is to distinguish the OPD's collective advocacy mandate from individual party activity, with clear rules for conflicts of interest and use of resources. This protects autonomy and constituency accountability without treating human rights advocacy as an improper political activity. (GC11, paras. 38, 42, 45 and 50.)

Specific measures to address underrepresentation

The Committee identifies measures such as targets, quotas, reserved seats, inclusive candidate lists, targeted recruitment, leadership programmes, support for disability-related costs and conditions on public party funding. It does not require every country to adopt every listed measure. Measures must respond proportionately to the disadvantage, be monitored and reviewed, and remain in place as long as necessary to achieve substantive equality. They must not perpetuate segregation or different standards of political competence. (GC11, paras. 35, 41 and 54.)

OPDs should assess who benefits and who remains excluded. A reserved seat may increase numerical presence while leaving the appointee dependent on the governing party or

disconnected from constituencies. A candidate quota may fail without accessible selection processes and campaign support. Specific measures should therefore be judged by their contribution to independent participation, substantive authority and inclusion of underrepresented groups. (GC11, paras. 14, 36, 41 and 54–55.)

6. Participation in public affairs and government decisions

The scope of public affairs

GC11 covers laws, policies, budgets, administrative decisions, oversight, public debate, peaceful assemblies and protests. Public affairs include international, national, regional and local processes. Restricting persons with disabilities to disability-specific consultations can itself amount to non-compliance. Economic policy, climate decisions, housing, taxation, digital public infrastructure and emergency governance may all affect their rights and must be assessed accordingly. (GC11, paras. 12, 32–35, 48, 58 and 64.)

Public consultation is one route to participation, not an exhaustive substitute for political agency. Individuals and OPDs must be able to organise, criticise, campaign and protest outside government-created mechanisms. An invitation to an official advisory body cannot justify restrictions on independent advocacy or cross-border cooperation. Persons engaged in this work must be protected as human rights defenders, including when they dissent. (GC11, paras. 32, 42–45 and 50.)

Meaningful influence across the policy cycle

The Committee requires participation early enough to influence the substance and direction of decisions, continuing through implementation, monitoring and review. Participation after all substantive choices have been settled is defective. So are processes that provide inaccessible documents, unrealistic deadlines or no explanation of how contributions were considered. Permanent mechanisms should operate continuously with clear mandates, sufficient authority and effective channels to decision makers. (GC11, paras. 33–35, 46, 53 and 68.)

Meaningful influence does not amount to a general OPD veto or a requirement that government accept every proposal. It requires a real opportunity to shape decisions, serious consideration of contributions and an accountable explanation of the outcome. Paragraph 68 expressly requires written, reasoned explanations in accessible formats within a specified reasonable time. A bare attendance list or a statement that stakeholders were consulted cannot establish whether this standard was met. (GC11, paras. 34–35, 46, 51, 53 and 68.)

A recommended consultation protocol should identify the decisions still open, who has authority to change them, the documents and budget information available, participation and access costs, the time needed for constituency deliberation, and the process for giving reasons. It should also provide a route to challenge exclusion before an irreversible decision is taken. OPDs should record how the process actually operated, including opportunities to comment on revisions. (GC11, paras. 35–37, 46–47, 51, 68 and 74.)

Inclusive participation and individual choice

A single appointed person cannot be presumed to represent the diversity of persons with disabilities. Representation should be multiple, accountable and connected to constituencies, with transparent selection, continuity, succession and opportunities for consultation before and after meetings. Supporters and professionals may complement direct participation but cannot replace it. (GC11, para. 36.)

At the same time, public mechanisms must reach people who do not belong to OPDs. Supporting OPD leadership must not make membership a condition of exercising an individual right. Accessible outreach, direct contributions and supported self-advocacy can work alongside representative participation. The aim is to strengthen collective voice while preserving the agency and choices of individuals. (GC11, paras. 32, 36–37, 42 and 68.)

Part Two OPD leadership and resourcing

7. OPDs as autonomous representative institutions

General Comment No. 11 treats organisations of persons with disabilities (OPDs) as part of the institutional conditions for equal political participation. Their involvement is not satisfied by inviting a disability organisation to a meeting after decisions have been made. The Committee links the collective dimension of participation to compliance with article 29 and describes OPDs as autonomous, self-governed representative bodies through which persons with disabilities organise, represent their interests and shape laws, policies and institutions. Their independence, ability to operate and capacity to influence decisions are therefore substantive implementation questions, not simply matters of stakeholder management. (GC11, paras. 6, 34–35, 42–46.)

Self representation and representative authority

The central distinction is between representation by persons with disabilities and contributions by other actors. Paragraph 36 states that representative organisations must be led, directed and governed by persons with disabilities. Family members, supporters, professionals and service providers may contribute, but their involvement cannot replace direct participation by persons with disabilities or their representative organisations. Paragraph 44 goes further: according entities without this leadership, direction or governance representative status in matters affecting persons with disabilities is identified as a manifestation of non-compliance. A provider's technical knowledge, funding relationship or familiarity with government does not establish a representative mandate. (GC11, paras. 36, 42, 44–45.)

Family involvement is not automatically disqualifying. GC7 recognises organisations involving family members where persons with disabilities want their support; that role must enable their voice and respect their will and preferences, consistently with GC11's prohibition on substitution. (GC7, para. 12(d); GC11, para. 36.)

This distinction should shape consultation rules, advisory bodies, donor partnerships and coalitions. Governments should identify which participants represent constituencies of persons with disabilities, which contribute professional or operational expertise, and how representatives remain accountable to their constituencies. They should allow OPDs to determine their own priorities and advocacy positions. Public authorities selecting only familiar, agreeable or administratively convenient organisations risk undermining pluralism and self-representation. Transparent selection and opportunities for constituency consultation are expressly identified safeguards. (GC11, paras. 36, 42, 44, 50, 68–69.)

The General Comment does not prescribe a universal registration system, membership threshold or detailed organisational accreditation test. Implementation should therefore avoid converting verification of representative character into a restrictive licensing system controlled by government. Relevant evidence can include who exercises actual governance

authority, how leadership is chosen, whether persons with disabilities control priorities, and whether the organisation maintains meaningful accountability to the people it represents. These are practical means of applying the requirements of self-governance and accountability; they are not additional eligibility requirements expressly specified in the text. Disproportionate registration and reporting obligations are themselves identified as barriers. (GC11, paras. 36, 42, 44–45, 69.)

Leadership technical expertise and the role of allies

OPD participation brings knowledge grounded in lived experience that the Committee considers essential to identifying barriers and improving public decision-making. A legally defensible position is therefore that representative OPDs must have a substantive role in identifying the problem, setting priorities, developing responses and judging whether those responses work. Commissioning an accessibility specialist or a large NGO cannot discharge the separate obligation to closely consult and actively involve OPDs. This applies to mainstream governance questions as well as disability-specific policies. (GC11, paras. 8, 11, 34–36, 42, 46, 53.)

The text does not, however, establish an exclusive OPD monopoly over every form of disability-related technical assistance, research or service delivery. Expertise in election administration, engineering, law, statistics or accessible technology can complement representative expertise. A sound implementation model gives OPDs meaningful influence over the terms of reference, standards, implementation and evaluation, while enabling relevant specialists to contribute. OPDs can themselves provide technical assistance, but their representational legitimacy should not be made dependent on winning a procurement contract or operating a service. The express rule concerns self-representation and non-substitution; the proposed commissioning model is a practical way to give it effect. (GC11, paras. 8, 36, 42–46, 50, 76.)

Coalition participation must also carry real influence. Paragraph 40 identifies the marginalisation of OPDs within civil society coalitions or political alliances as a possible form of non-compliance. In practice, coalition agreements should address agenda-setting, decision-making, public attribution, access to information and resources, and how disagreements are recorded. Simply including an OPD's name or logo on a joint initiative does not demonstrate that it helped determine the initiative's direction. These governance arrangements are recommended safeguards drawn from the requirement of effective participation. (GC11, paras. 34–36, 40–42.)

Pluralism and constituency accountability

One person or organisation cannot automatically represent the diversity of persons with disabilities. Paragraph 36 rejects symbolic reliance on a single appointee and calls for safeguards for multiple and diverse representation, transparent selection, continuity, succession and consultation with constituencies. Paragraph 69 specifically protects access to funding for smaller grassroots organisations, self-advocacy and peer-led groups, and

organisations representing underrepresented constituencies. A national umbrella body can make an important contribution, but its involvement does not by itself establish that all relevant perspectives have been heard. (GC11, paras. 5, 34, 36, 69.)

Representation arrangements should enable women, young people, Indigenous persons, rural communities, persons with intellectual or psychosocial disabilities, deafblind persons and others facing compounded exclusion to organise and participate on their own terms. The choice between umbrella participation, constituency-specific participation and direct individual engagement should be made by reference to the subject, affected communities and barriers identified, rather than administrative convenience. The General Comment also requires outreach to persons who are not affiliated with OPDs: organised representation and accessible opportunities for unaffiliated people are complementary. (GC11, paras. 5, 35–37, 54–55, 68–69.)

Accountability requires time and resources for representatives to consult before meetings and report back afterwards. A representative who receives inaccessible papers the evening before a consultation cannot reliably deliberate with a geographically dispersed constituency. Meeting preparation, accessible communication, peer discussion, feedback and leadership succession should therefore be treated as part of meaningful representation. This is a direct practical implication of the consultation safeguards, although the particular organisational methods remain for OPDs themselves to choose. (GC11, paras. 33, 36–37, 42, 46, 68.)

Independent monitoring and civic space

OPDs have a role beyond contributing to government programmes. They must be fully involved in monitoring frameworks under article 33, and their ability to criticise, organise, cooperate across borders and express dissent must be protected. Participation in an official advisory mechanism does not extinguish their independent advocacy role or require agreement with government. Equally, involvement in monitoring does not transfer the State's duty to establish and maintain an effective monitoring framework to an underfunded organisation. (GC11, paras. 44, 49–51, 65, 74.)

The Committee expressly links OPD independence to an open, safe and enabling civic space and recognises persons engaged in advocacy, consultation or monitoring as human rights defenders, including when they dissent. Funding cuts, exclusion from meetings, surveillance or threats used to punish criticism must therefore be assessed as potential interference with participation, rather than treated solely as disagreements over grant management. States must prevent and remedy discriminatory or disproportionate restrictions, protect against reprisals and provide accessible accountability mechanisms. The legal assessment must still examine the evidence and reasons for the particular measure. (GC11, paras. 50–51, 60, 74.)

8. Resourcing OPDs for sustained and autonomous participation

What the General Comment expressly requires

The funding provisions should be read together. Paragraph 50 requires equitable and transparent access to resources and capacity-enhancing measures so that OPDs can operate independently and sustainably. Paragraph 67 calls for budgetary commitments and adequate, sustained resources enabling autonomous engagement. Paragraph 69 requires adequate and sustainable access to resources through mechanisms that are accessible, transparent, equitable and proportionate, without disadvantaging smaller or underrepresented groups because of size or administrative capacity. These are considerably stronger requirements than an occasional invitation accompanied by reimbursement of transport costs. (GC11, paras. 50, 67, 69.)

The text does not specify a funding percentage, a minimum grant amount, a universal funding formula or an entitlement for every OPD to receive a particular public grant. Nor does it prescribe one funding instrument for every context. The defensible demand is that the overall arrangements demonstrably enable adequate, sustained and independent participation, with equitable access and protection against exclusionary requirements. Governments should be able to explain how their budgets and funding mechanisms achieve these outcomes, and OPDs should be involved in designing and evaluating those arrangements. (GC11, paras. 46, 50, 67–69.)

Three distinct costs must be addressed

First, public institutions must finance accessible systems: accessible consultation documents and platforms, inclusive meeting procedures, accessible electoral administration, trained personnel and effective complaints mechanisms. These are institutional responsibilities. They should not be shifted to OPDs by expecting organisations to translate all government materials, supply interpreters from their own grants or repair inaccessible public systems without adequate arrangements and resources. OPDs may contribute expertise, but their contribution does not displace the public authority's obligations. (GC11, paras. 22, 47–48, 57, 67, 70, 74.)

Second, participation must not generate financial barriers for individuals. Paragraphs 37 and 54 require reasonable accommodation without cost to the individual. Paragraph 70 addresses necessary personal assistance, support persons, accessible transport, communication support and assistive technologies. Paragraph 71 states that necessary consultation expenses, including travel, subsistence and connectivity, should be covered or promptly reimbursed. These provisions support advance arrangements or direct payment where reimbursement would otherwise exclude people who cannot pre-finance attendance. Advance payment is a practical recommendation, rather than an expressly mandated universal payment method. (GC11, paras. 37, 54, 70–71.)

Third, OPDs need organisational resources to undertake representative work over time. Constituency outreach, policy analysis, accessible internal deliberation, coalition-building, governance, monitoring and follow-up cannot be financed adequately by paying only the cost of attending government meetings. Paragraphs 50 and 69 address sustainable organisational operation and access to resources, not merely individual expenses. The practical funding response should therefore distinguish institutional accessibility expenditure, participation support and organisational support, while ensuring that the three work together. This distinction is an analytical framework for implementation, not a three-part classification stated by the Committee. (GC11, paras. 36, 42, 46, 50, 67–71.)

Why core and flexible funding matter

Multi-year core or flexible funding is a strong implementation option because representative organisations need continuity between consultations and election cycles. It can support staff, premises, communications, accessible governance, membership engagement, policy expertise, financial administration, security and succession. Restricted project funding can be useful, but an arrangement that pays only for donor-selected activities may leave the representative institution too weak to determine its own agenda or respond to an unexpected legislative proposal. The General Comment expressly requires sustainability and autonomy; it does not expressly require all funding to be unrestricted or multi-year. The appropriate instrument should be judged against those substantive requirements. (GC11, paras. 42–45, 50, 67–69.)

A practical funding system could combine multi-year organisational grants, accessible small grants for emerging groups, participation-cost support, and additional resources for time-limited policy or monitoring initiatives. Costs should be assessed realistically, including accessibility, administration, constituency consultation and retention of skilled personnel. OPDs should be able to explain representative work through qualitative and quantitative evidence, rather than being judged solely on meetings attended or documents produced. These are recommended funding-design choices derived from the Committee's requirements; they are not prescribed grant categories or mandatory budget headings. (GC11, paras. 36, 50–51, 67–69, 73.)

General Comment No. 7 supplies more specific guidance that strengthens these requests. Its funding recommendations include direct funding that avoids third-party intermediation, prioritisation of OPDs focused on advocacy, specific funds for organisations of women and children with disabilities, and sustainable core institutional funding alongside project funding. It also emphasises autonomy in determining advocacy agendas, the distinction between operating and project resources, and accessible application procedures. Its inclusion guidance addresses self-advocacy organisations denied legal status because of restrictions on legal capacity. These recommendations should be used alongside GC11's obligations concerning sustainability, independence and equitable access. Accordingly, an OPD seeking core or direct funding can cite an express recommendation in GC7 as well as

the broader standards in GC11, without claiming that GC11 itself mandates a particular grant instrument or budget share. (GC7, paras. 61–64; GC11, paras. 50, 69.)

Equitable access and proportionate assurance

Equal treatment does not necessarily mean identical procedures for every organisation. A short application may be manageable for a small peer-led group; a complex tender requiring a large turnover and extensive previous donor experience may exclude that group before its proposal is assessed. Paragraph 69 directly rejects disadvantage based on organisational size or administrative capacity, while paragraph 44 identifies disproportionate reporting and operational requirements as barriers. Funding arrangements therefore need scrutiny for their actual exclusionary effects, including when apparently neutral criteria favour well-established organisations. (GC11, paras. 44, 54, 69.)

Recommended measures include accessible application materials, alternative submission formats, assisted applications, realistic timelines, proportionate evidence requirements, staged grants and funded support for financial administration. Assessment should distinguish a manageable organisational gap from a serious risk that cannot presently be addressed. For organisations without legal personality, locally lawful arrangements such as an accountable fiscal host or an OPD-managed intermediary may provide access; they require safeguards against loss of control, excessive charges or substitution by the host. These mechanisms are implementation options, and their legal feasibility must be checked locally. (GC11, paras. 42, 44–45, 50, 69.)

The text does not exempt OPDs from legitimate financial controls, safeguarding responsibilities or accountability for agreed expenditure. It requires that the controls be proportionate and compatible with autonomous representation. Funders can require evidence that money was used lawfully for agreed purposes without directing an OPD's policy positions or selecting its leadership. Capacity-enhancing measures should help the organisation pursue its own representative functions; they should not become an indefinite precondition that postpones meaningful participation until a donor declares it sufficiently capable. (GC11, paras. 42, 44, 50, 69.)

Public and private funding without control

Paragraph 50 expressly applies the autonomy safeguard to public and private support. Funding must not be used to interfere with OPDs' self-organisation, accountability to persons with disabilities, governance, priorities or advocacy positions. Public financing and independence are therefore compatible; what matters is the design and operation of the relationship. Equally, a private or international funder does not preserve independence simply because it is outside government. Donor-imposed priorities and control over representation can also undermine the standard described by the Committee. The obligations articulated by the General Comment are directed to States parties; it should not be read as making every private donor independently a party to the treaty. (GC11, paras. 42, 49–50, 64, 76.)

Recommended safeguards include published eligibility and allocation criteria, transparent decisions, an accessible review route, written protection for independent advocacy, clear separation between grant oversight and substantive policy disagreement, and reasons and fair procedures for suspension or termination. Public bodies can require grant-funded civic education to be non-partisan where that is the agreed purpose, while preserving an OPD's freedom to take independent positions on legislation or government policy. The key distinction is between legitimate conditions tied to lawful use and agreed activities, and conditions that control governance or suppress rights-based advocacy. (GC11, paras. 32, 42, 50, 69, 74.)

International cooperation and funding partnerships

Governance and development cooperation should strengthen representative organisations and their participation, rather than simply finance accessibility outputs around them. Paragraph 64 requires adequate and sustained resources for inclusive participation at local, national, regional and international levels. Paragraph 76 requires relevant partnerships, technical assistance and capacity-building to strengthen representative organisations and reinforce treaty obligations. These provisions support asking bilateral donors, multilateral institutions and NGO intermediaries to show how OPDs influence programme choices and receive the resources needed for that role. They do not themselves prescribe direct funding in every case or a mandatory share of every programme budget. (GC11, paras. 46, 50, 64, 76.)

Where intermediaries are used, recommended arrangements include OPD involvement in funding decisions, transparent administrative charges, clear agreements on ownership of work and public attribution, accessible complaints, and a credible route to greater organisational autonomy. Strengthening an OPD is not demonstrated merely because its representatives attend a training course. The relevant question is whether the organisation is better able to govern itself, consult its constituency, set its agenda, access decision-makers and sustain independent action. (GC11, paras. 36, 42, 45, 50, 69, 76.)

A practical OPD resourcing request

An OPD can turn these provisions into a concise negotiating proposal:

- Identify the representative functions that require sustained support, including constituency consultation, analysis, accessible governance, participation and independent monitoring. Explain which current funding gaps prevent those functions. (GC11, paras. 36, 42, 46, 50, 65.)
- Ask the responsible authority for a published funding mechanism with clear criteria, realistic budgets, a timetable, proportionate requirements and an accessible review route. Request a written explanation of how smaller and underrepresented organisations will gain equitable access. (GC11, paras. 44, 67–69, 74.)
- Present a costed organisational proposal separately from meeting-related expenses and the public authority's own accessibility costs. Identify which costs recur, which require

advance payment and which are connected to specific activities. (GC11, paras. 37, 47, 50, 69–71.)

- Propose explicit contractual protection for independent governance, constituency accountability, public criticism and advocacy, alongside agreed financial reporting and safeguards. (GC11, paras. 42, 45, 50.)
- Agree indicators of meaningful influence and sustained capacity, together with a review process involving diverse OPDs. Document whether contributions receive reasoned responses, whether funding reaches excluded groups and whether organisations remain free to dissent. (GC11, paras. 36, 50–51, 68–69, 73.)

The strongest resourcing argument connects expenditure to the concrete conditions required for exercising a right: independent organisation, informed deliberation, representative accountability, substantive influence and effective monitoring. It also makes clear that funding is one component of compliance. A well-funded OPD cannot compensate for discriminatory laws, closed decision-making, inaccessible institutions or retaliation against defenders. (GC11, paras. 17, 34–35, 44–51, 66–74.)

Part Three Implementation protection and accountability

9. Equality across diverse constituencies

GC11 requires attention to compounded and structural exclusion. Women, children and young persons, older persons, Indigenous peoples, minorities, migrants, displaced persons, people in poverty, persons with intellectual or psychosocial disabilities, deafblind persons and those requiring intensive support may encounter different combinations of barriers. A measure designed around the requirements of a comparatively well-resourced participant may therefore leave others excluded. The relevant question is whose participation improves and whose remains theoretical. (GC11, paras. 5, 34, 36–37, 54–55 and 69.)

For women with disabilities, reform must address gender-based violence, exclusion from party structures, digital harassment and socioeconomic marginalisation as well as physical accessibility. For children and young persons, participation must be age-appropriate, accessible and supported, with due weight given to their views. For people in remote communities, the cost and availability of transport, connectivity and accessible information may determine whether participation is possible. These requirements call for specific measures developed with the affected constituencies, rather than treating diversity as an attendance target. (GC11, paras. 5, 32, 35, 54–55 and 70–71.)

Recommended implementation includes direct engagement with underrepresented groups; support for their own organisations and leadership; accessible and safe consultation methods; and review of who controls speaking time, agenda-setting and funding. A coalition should ask whether an apparently common position reflects deliberation or whether some members lacked the resources to participate. Specific measures should strengthen agency and influence without establishing lower standards of political competence or segregated political status. (GC11, paras. 36, 42, 54 and 69.)

10. Digital systems privacy and evidence

Digital inclusion must be tested in practice

Digital public services can reproduce discrimination through inaccessible interfaces, incompatible authentication, automated exclusion or opaque decisions. Paragraph 48 requires accessibility by design, interoperability with assistive technologies, privacy safeguards, accessible alternatives, human supervision and effective review. Where biometric registration cannot enrol or reliably authenticate a person with a disability, an accessible non-biometric alternative must be available. Error and rejection rates must be independently monitored and published with appropriate safeguards. (GC11, paras. 20, 48 and 57.)

A recommended procurement approach is to make accessibility a contractual requirement, involve diverse users in testing, document failures, require timely corrections and retain an effective alternative channel. OPD user testing should be resourced and should inform the authority's acceptance decision. It must complement professional technical assessment and

regulatory enforcement. A supplier's self-declaration cannot establish that a platform works for the people expected to use it. (GC11, paras. 22, 46, 48, 57 and 70.)

Disaggregated data without political surveillance

Paragraph 73 requires systematic disaggregated data and indicators concerning political participation, including registration, turnout, candidacy, representation and consultation. Paragraph 63 protects privacy and prohibits using such data to infer political choices, profile political activity, conduct surveillance or determine electoral eligibility. The duties must be applied together. Monitoring equality does not justify creating a register that links named individuals' disability status to how they vote. (GC11, paras. 63 and 73.)

Information collected to arrange support or accommodation must be based on free and informed consent, kept confidential, separated from eligibility records and retained no longer than necessary. Participation must not depend on public disclosure of diagnosis, treatment history or disability status. These specific requirements should not be diluted by a broad assertion that all data collection serves inclusion. OPDs should ask what is collected, why, who can see it, what it is linked to, when it is deleted and how the person can raise concerns. (GC11, para. 63.)

Recommended safeguards for evidence collection include minimising identifying details, separating contact information from case accounts, controlling access, securing files and obtaining specific consent for publication. Small-group statistics should be withheld or combined where they could identify a person. Voluntary surveys and protected aggregate analysis may provide evidence without linking voters to individual choices. Methods, denominators and limitations must be reported so that a small sample of barriers is not misrepresented as a national prevalence estimate. (GC11, paras. 48, 63 and 73.)

11. Civic space institutions and emergencies

Protection against intimidation and reprisals

Participation requires protection from coercion, targeted violence, harassment, retaliation and surveillance. Risks may arise from public officials, parties, employers, family members, support providers or digital actors. States must respect rights themselves and protect against private interference. Protective measures must support participation and individual choice; a purported protection measure that excludes a person from public life because of disability would reproduce the violation. (GC11, paras. 23, 27, 49–51 and 60.)

OPDs should be able to seek confidential reporting, investigation, protective measures and effective remedies without being required to abandon public criticism. Recommended organisational measures include a consent-based response protocol, secure communication, access to legal advice, emergency support and procedures for recording reprisals. Authorities should investigate the conduct complained of, rather than dismissing it as a normal consequence of entering politics. The form of protection should be discussed with

the affected person, including its impact on their autonomy and privacy. (GC11, paras. 37, 50–51, 60, 63 and 74.)

Participation while ending institutionalisation

The General Comment repeatedly addresses institutional and segregated settings pending their elimination. Electoral access in an institution is an immediate rights question; it must not be presented as approval of continued institutionalisation. Paragraph 61 requires ending institutionalisation, preventing new placements and providing individual support and community-based services. In the meantime, residents must retain registration, access information and OPDs, choose assistance and vote without staff control or coercion. (GC11, paras. 22–23, 29–31 and 61.)

OPD engagement with residents should respect their will and preferences and avoid allowing institutional gatekeepers to determine who can speak. Recommended monitoring should examine access to outside information, private communication, independent support and complaints. Authorities should prevent changes to registration based solely on institutional residence without the person's free and informed choice. These measures protect current rights while maintaining the obligation to secure community inclusion. (GC11, paras. 22, 29–31, 59 and 61.)

Participation during crises

Armed conflict, occupation, disasters and public health emergencies do not erase the need for disability-inclusive decisions. The Committee requires participation in emergency response, crisis governance and recovery, alongside accessible contingency electoral arrangements when possible. It specifically rejects disability-based suspension or practical nullification of participation. This should not be overstated as a finding that every election must proceed unchanged in any crisis; it requires equal participation and protection against disability-based exclusion within the applicable arrangements. (GC11, paras. 58 and 75.)

Recommended preparedness measures include established OPD contact channels, accessible emergency information, representation in response and recovery decisions, continuity funding, alternative participation methods and protection for displaced members. Crisis plans should be tested before an emergency and should identify who can authorise access and support costs rapidly. International assistance must strengthen inclusive institutions and representative organisations rather than postpone the State's obligations. (GC11, paras. 58, 64, 67, 75–76.)

12. Government responsibilities and implementation priorities

Fragmented responsibility is a recurring source of exclusion. GC11 requires coordinated governance reforms, clear institutional responsibilities, budget commitments, implementation timelines, accessible reporting and measurable objectives. A ministry responsible for disability cannot alone ensure accessible elections, parliamentary procedure,

political party regulation and municipal consultation. All levels of government must implement the Convention, including in federal and decentralised systems. (GC11, paras. 7, 22, 41, 66–70.)

The following allocation is a recommended implementation model, adapted to national contexts:

- The legislature reviews electoral and related laws, removes discriminatory provisions, funds implementation and makes its own procedures accessible. OPDs participate from the conception of reforms through evaluation. (GC11, paras. 17, 27, 46, 66–68.)
- Electoral authorities implement accessible registration and voting, chosen assistance, independent assessments, staff training and urgent complaint routes. They publish correction plans with responsible officers and deadlines. (GC11, paras. 18–31, 48 and 74.)
- Finance and coordinating ministries establish sustained budget commitments, equitable OPD funding mechanisms and clear responsibility for participation costs across government. (GC11, paras. 50, 67 and 69–71.)
- Ministries and local authorities maintain accessible participation mechanisms across ordinary policy and budget processes, with early engagement and reasoned feedback. (GC11, paras. 32–37, 46–47 and 68.)
- Authorities regulating parties and associations address discriminatory internal rules, inaccessible practices and barriers to leadership, while protecting freedom of association. (GC11, paras. 38–45, 50 and 74.)
- Independent monitoring institutions and competent courts examine legal and practical exclusion, ensure accessible procedures and effective remedies, and involve OPDs in monitoring. (GC11, paras. 51, 65 and 72–74.)
- Development cooperation authorities require relevant governance programmes to include persons with disabilities, resource participation and strengthen representative organisations. (GC11, paras. 64 and 76.)

A national implementation plan should begin with current violations and imminent decisions. Authorities should immediately end discriminatory practices, restore excluded rights and provide necessary accommodation and protection. In parallel, they should complete a joint legal and accessibility audit with OPDs, publish a costed reform plan, establish sustainable participation and funding arrangements, and report progress. This is a proposed sequence for implementation, not permission to defer any current obligation. (GC11, paras. 17, 22, 27, 46, 67–74.)

Existing access and representation must also be protected. Paragraph 72 rejects retrogressive reforms diminishing established levels of participation and requires safeguards against reintroducing disability-based restrictions. A budget reduction, altered consultation procedure or digital replacement should therefore be assessed for its effect on equal participation. OPDs should document what is being lost, the affected constituencies, alternatives considered and the availability of independent review. Not every change in a

grant amount proves a violation by itself; its justification, wider arrangements and practical consequences matter. (GC11, paras. 50, 69 and 72–74.)

13. Remedies monitoring and international advocacy

Remedies must work before participation is lost

A remedy must be accessible, independent, effective and sufficiently prompt to address the violation. Electoral deadlines make timing decisive. A process that delivers a favourable finding after the person has irreversibly lost the opportunity to register, vote or stand may be inadequate. Paragraph 74 expressly addresses accommodation within short electoral dispute deadlines, and covers exclusion from consultations and discrimination within parties and associations as well as voting arrangements. (GC11, paras. 51, 54 and 74.)

Depending on the competent body's powers, requested remedies may include an urgent accessible registration route, restoration of voting rights, provision of accommodation, suspension of an exclusionary step, reopening consultation while options remain open, investigation of coercion, revision of a discriminatory rule and measures preventing recurrence. These are proposed forms of relief; GC11 does not automatically invalidate every decision reached through a defective process. The remedy requested should explain how it will restore participation and address the underlying cause. (GC11, paras. 17, 27, 31, 51, 68 and 72–74.)

OPDs can combine individual cases with systemic evidence. One person's inaccessible registration experience may reveal a national platform problem; an excluded peer-led group may expose disproportionate funding criteria. The individual must retain control over their own claim and disclosure of personal information. An OPD's collective advocacy should support, rather than displace, the person's will and preferences. (GC11, paras. 47, 50–51, 59, 63 and 69.)

Monitoring influence and results

Monitoring should assess the quality and impact of participation as well as the existence of formal procedures. Structural indicators can show whether discriminatory laws have been repealed and binding standards adopted. Process indicators can track timely accessible documents, disbursement of resources, provision of accommodation and reasoned responses. Outcome evidence should show whether people can exercise rights, whether barriers have been removed and whether participation changes decisions in practice. (GC11, paras. 51, 68 and 73.)

Measures should not reward government agreement or compel OPDs to claim sole credit for policy change. A well-reasoned rejection of a proposal may satisfy one procedural requirement while the underlying policy still violates substantive rights. Conversely, adoption of one OPD recommendation does not establish compliance if other constituencies were excluded. Quantitative indicators should therefore be accompanied by member-validated accounts and independent scrutiny. (GC11, paras. 34–36, 50–51, 68 and 73.)

Using international mechanisms

OPDs can use GC11 in alternative reports, proposed questions and follow-up submissions to the CRPD Committee, linking national evidence to precise obligations and requesting measurable recommendations. Similar evidence can inform other relevant human rights processes. International advocacy should identify the national decision needed, responsible institution, resources and timetable, rather than seek a general endorsement of inclusion. These are recommended advocacy uses grounded in the collective participation, monitoring and accountability framework. (GC11, paras. 42–46, 50–52, 65 and 73–74.)

An individual communication under the CRPD Optional Protocol requires the State's participation in that Protocol, an alleged violation affecting identified individuals or groups, and satisfaction of admissibility requirements. These include restrictions concerning duplicate international proceedings, sufficient substantiation, temporal jurisdiction and exhaustion of available domestic remedies, except where unreasonably prolonged or unlikely to bring effective relief. Interim measures may be requested to prevent possible irreparable harm. An OPD can assist victims or act on their behalf where requirements are met; the Protocol should not be presented as an unrestricted mechanism for abstract review. (Optional Protocol, arts. 1–2 and 4.)

Part Four OPD advocacy toolkit

This toolkit helps organisations of persons with disabilities (OPDs) convert the General Comment into specific demands, evidence and follow-up. The templates are proposed advocacy language, not quotations from the Convention or the Committee. Timetables, budget structures and indicators below are practical recommendations. Select and adapt them with members; the General Comment does not prescribe these particular instruments or funding amounts. Its central requirements are autonomy, effective influence, accessibility, adequate resources and accountability (GC11, paras. 35–37, 42–46, 50–51, 68–74).

Tool 1 Agree a mandate and three priority changes

Begin with an accessible discussion with members. Ask: “Where are we excluded? What decision must change? Who has power to change it? What would success mean to us?” Include self-advocates, smaller groups and constituencies usually absent from public processes. Do not assume one organisation or individual represents every person with a disability. Agree how representatives will consult members, report back and record disagreement (GC11, paras. 5, 36, 42, 69).

Complete this short mandate:

- Our constituency and how it selected this position: [insert].
- Our three priority changes: [insert specific, achievable decisions].
- Our representatives and their authority to negotiate: [insert].
- Decisions requiring further member consultation: [insert].
- Accessibility, support and safety requirements: [insert confidential arrangements].
- Date and accessible method for reporting back: [insert].

Keep organisational advocacy independent of government, donors and political parties. Members retain their own political views and participation rights. OPD independence does not require political silence; the Committee expressly protects dissenting advocacy and organisational control over priorities (GC11, paras. 38, 42, 50).

Tool 2 Turn rights into requests and evidence

For each priority, complete: **barrier** → **legal basis** → **decision requested** → **responsible authority** → **evidence** → **deadline** → **follow-up**. These examples show how:

Disqualification through guardianship or an impairment-related test. Request repeal and restoration of rights without a new application or capacity reassessment. Gather the relevant provision, electoral instructions and consent-based evidence of exclusion. Cite articles 5, 12 and 29 and paragraphs 16–17 and 59. Do not propose a supposedly fairer political-competence test.

Inaccessible registration or voting. Request binding standards, an advance independent assessment, procurement corrections and an immediate accessible route. Document the

complete attempted task, failure point and practical consequences. Address ballot secrecy and non-traceability as well as physical access (GC11, paras. 18–23, 27, 48).

A consultation after decisions are settled. Request reopening of the relevant decision stage, accessible documents, deliberation time and a reasoned response to proposals. Preserve invitation dates, document versions and the decision timetable (GC11, paras. 33–35, 46, 68).

An NGO or service provider appointed to represent persons with disabilities. Request direct, diverse OPD participation and transparent selection. Record who controls the selected entity and whom it is accountable to; avoid assuming organisational labels settle the issue. Supporters may contribute, but cannot replace self-representation (GC11, paras. 36, 42, 44–45).

An OPD unable to participate because funding excludes core work or small groups. Request accessible, equitable funding and proportionate requirements. Compare eligibility rules, payment schedules and participation costs with the resources actually available. Explain how the gap undermines autonomy and representative capacity (GC11, paras. 43–45, 50, 69–71).

Label evidence accurately: observed fact, participant account, documented rule or inference. State sample size and limitations. A few accounts may establish a serious barrier without establishing its national prevalence. Collect only necessary personal information (GC11, paras. 63, 73).

Tool 3 Adapt a short government request

Subject: Action requested to implement CRPD article 29 and General Comment No. 11

Dear [name/title],

[OPD name] is [brief description of constituency and disability-led governance]. Our members have identified [specific barrier], affecting [participation process]. Evidence includes [brief description; confidential material supplied separately where appropriate].

We request that [authority] take the following actions: [decision 1], [decision 2] and [decision 3]. Please identify an accountable official, implementation dates and the necessary budget. Pending structural reform, please provide [specific immediate remedy].

These requests concern [relevant Convention articles], interpreted in General Comment No. 11, paragraphs [select the precise references]. Paragraphs 46 and 68 require participation from the earliest stages and accessible explanations of how contributions influence outcomes; paragraphs 50 and 69 address sustainable, independent OPD participation and equitable access to resources.

Please arrange an accessible meeting by [proposed date], provide [materials/formats] in advance and cover [necessary participation and accessibility costs]. We request a written, accessible response by [proposed date], identifying actions agreed and reasons for any refusal.

Yours sincerely,

[Name, role, organisation, accessible contact options]

Adapt the request to the addressee's powers and the State's treaty position. A requested response date is a proposed advocacy deadline unless an applicable rule makes it legally binding (GC11, paras. 66–68, 74).

Tool 4 Submit an OPD resourcing request

Use this template with public authorities and donors. The proposed funding design implements the objectives in paragraphs 50 and 69; the General Comment does not specify a universal grant model or guaranteed sum.

Purpose: Enable [OPD/coalition] to represent [constituencies] independently in [processes] over [period], with a mandate agreed through [member process].

Expected changes: [Decisions, practices or accountability improvements sought]. Separate changes under OPD control from outcomes requiring government action. Do not promise a particular policy outcome as a condition of payment.

Work and full costs: For each item provide quantity, unit cost, period, total and basis of estimate:

- Member-led governance, staff, administration, rent, financial management and essential equipment.
- Accessible member consultations, outreach, translation and communication.
- Policy analysis, legal advice, research, submissions and independent monitoring.
- Interpretation, captioning, Easy Read, support persons, personal assistance and assistive technology.
- Travel, subsistence, connectivity and the additional time needed for accessible participation.
- Fair remuneration for agreed expert work, with accessible recruitment and payment arrangements.
- Grass-roots participation or subgrants, with transparent, proportionate administration.
- Digital security, safeguarding, necessary protection and an agreed contingency.

Explain how each cost supports sustained representation, equal participation or organisational autonomy (GC11, paras. 35–37, 50, 67, 69–71).

Requested terms: [Multi-year period]; [flexible core grant]; [advance payment schedule]; [accessible application]; [proportionate reporting]; [mechanism for changing accessibility costs]; [renewal timetable]. These are recommended arrangements, to be negotiated, rather than verbatim Committee requirements. Smaller and peer-led groups should have equitable routes without being disqualified merely by size or administrative capacity (GC11, para. 69).

Independence safeguard: “Funding will not require endorsement of government or donor positions, restrict lawful criticism or confer control over the OPD's leadership, member

accountability or advocacy priorities." Agree transparent financial reporting and objective controls that do not become interference (GC11, paras. 42, 44, 50).

Separate budget responsibility: Identify costs the authority must meet to make its own processes accessible, and costs supporting OPD capacity. A grant to an OPD must not become the government's justification for leaving public infrastructure or consultation systems inaccessible (GC11, paras. 47–48, 57, 70).

Evidence and review: Record disbursement dates, unfunded costs, access provided, constituencies reached and changes secured. Assess whether payment delays or reporting burdens prevent participation. Review the arrangement with members and the funder while preserving confidential advocacy and member information (GC11, paras. 50–51, 63, 69, 73).

Tool 5 Check whether consultation is meaningful

Use "yes", "no", "partly" and "evidence/action needed" against each question, while noting that a single serious exclusion cannot be cancelled out by a high overall score.

Before participation:

- Can OPDs shape the agenda before options are fixed?
- Are selection, scope, decision powers and deadlines clear?
- Are diverse disability-led groups included, with outreach beyond established organisations and to unaffiliated individuals?
- Is there enough time for accessible preparation and member deliberation?
- Are documents and digital/physical venues accessible in practice?
- Have individual accommodation and support requirements been discussed confidentially?
- Are necessary costs covered or promptly reimbursed, with an advance-payment solution where otherwise participation would be impossible?

During participation:

- Can participants speak, sign, communicate through chosen methods or contribute in writing?
- Are freely chosen supporters available without replacing the participant's voice?
- Are breaks, flexible formats and additional deliberation possible?
- Do OPDs have effective routes to decision-makers and space to disagree?

After participation:

- Is there an accessible, reasoned explanation of how each substantive proposal was considered?
- Can representatives consult members and correct the record?
- Can OPDs participate in implementation and evaluation?
- Is there an accessible complaint route and protection from reprisals?

The checklist draws on paragraphs 34–37, 46–51, 68 and 71. The advance-payment solution is a practical response to financial exclusion; paragraph 71 expressly addresses coverage or prompt reimbursement.

Tool 6 Conduct an accessible election audit safely

Agree the audit's scope and any required observer accreditation. Include diverse users and test the whole journey: information, registration, identity verification, transport, polling, chosen assistance, secret voting and complaints. Extend assessment to candidate nomination, campaign access, observer roles and exercising office where relevant (GC11, paras. 18–27, 38–41, 48, 70).

For each test, record:

- Date, location or service, applicable standard and task attempted.
- Barrier observed, who it affects and practical consequence.
- Whether ordinary procedures, accommodation and an accessible alternative work.
- Responsible authority, proposed remedy and urgency.
- Evidence reference, consent restrictions and re-test result.

Use demonstrations, sample materials and controlled user testing where appropriate. Do not photograph completed ballots, record political choices or ask assistants how someone voted. Do not conduct tests that compromise a live ballot's secrecy or interfere with voting. Check that assistance is requested and chosen, and that institutional staff cannot organise or direct group voting (GC11, paras. 23, 28–31).

Collect only necessary personal data. Do not demand diagnosis or treatment history as the price of reporting exclusion. Seek free and informed consent, restrict access, separate identifying details from findings and set deletion dates. Suppress small-group detail where disclosure could identify individuals. Avoid publishing precise locations or personal accounts where these create retaliation risks. Never link disability or support records to individual political choices or electoral eligibility (GC11, paras. 50, 60, 63, 73).

Report urgent barriers immediately through the competent channel. Publish aggregate findings with methods, limitations and requests for correction; record whether fixes work before the relevant deadline (GC11, paras. 21–22, 48, 74).

Tool 7 Prepare a complaint or request for urgent protection

Use the following as an intake and drafting structure, then adapt it to the competent body's rules:

- **Complainant and authority to act:** [person/OPD; contact; consent or authority where representing others; confidentiality requirements].
- **Respondent and jurisdiction:** [responsible body; why this forum can consider the claim; standing and relevant deadlines].

- **Facts:** [dated chronology; rule or conduct; requests already made; responses; actual or imminent exclusion].
- **Legal basis:** [applicable domestic law; relevant Convention articles; precise General Comment paragraphs]. Explain the link between the barrier and the obligation.
- **Evidence:** [documents, correspondence, screenshots, audit records and consent-based statements; confidential annex where needed].
- **Remedy:** [specific access or accommodation; restoration of rights; reconsideration of consultation; revision of discriminatory rules; investigation; enforceable prevention of recurrence].
- **Urgency:** [election or decision date; likely irreparable consequences; requested interim protection and why it is necessary].
- **Procedure and support:** [accessible filing and communication, interpretation, support, legal assistance and protection against retaliation].

Paragraphs 51, 54, 72 and 74 support accessible accountability and effective remedies; select additional paragraphs for the substantive violation. Do not assume every forum can order every remedy, that the General Comment itself creates domestic jurisdiction, or that an informal complaint suspends a filing deadline. Check standing, available powers, admissibility, deadlines and any requirements governing later international procedures before choosing a route. Seek legal support early where necessary; preserve the person's own will, preferences and confidentiality (GC11, paras. 47, 59, 63, 74).

Tool 8 Measure influence and challenge donor practice

Agree a small public dashboard with baselines, targets, dates and named owners. Combine structural, process and outcome indicators (GC11, para. 73). Useful examples include:

- Number and scope of disability-based restrictions repealed; evidence of rights restored in practice.
- Percentage of assessed election services meeting agreed standards, with failures and re-test results reported.
- Percentage of consultations providing accessible documents before deliberation and reasoned feedback by the agreed date.
- Member-validated examples of OPD proposals changing policy text, budgets, implementation or oversight.
- Funding duration, timeliness and accessibility; proportion reaching smaller or underrepresented OPDs.
- Time taken to provide accommodation and resolve complaints, and whether remedies prevent recurrence.

Record the explanation when proposals are not accepted; meaningful influence does not mean every proposal must prevail. Avoid rewarding only agreeable positions or counting attendance as proof of participation. Compare results across constituencies where this can

be done safely, using qualitative evidence where small numbers make statistical reporting unsafe or misleading (GC11, paras. 36, 50–51, 63, 68–69, 73).

For a donor or international partner, ask: “Where are OPDs involved in setting priorities and approving programme design? What funding sustains independent representation? Are accessibility and participation costs budgeted throughout? What decision-making roles and resources reach grass-roots groups? How can OPDs challenge this programme without losing support?” Request a written response and a revised budget or governance arrangement (GC11, paras. 50, 64, 69, 76).

Articles 29 and 32, as interpreted in paragraphs 64 and 76, support demands that States parties make relevant international cooperation inclusive, adequately resourced and supportive of representative organisations. When addressing a private foundation or NGO, frame these standards as the basis for responsible partnership and programme design; do not present that organisation as a State party with identical treaty obligations. End each advocacy cycle by asking members whether participation increased their actual influence and whether the OPD retained the freedom and resources to speak for itself (GC11, paras. 42, 45, 50–51, 68–69).

Reference guide

Key paragraphs for OPD advocacy

- Equal political status and meaningful participation: paragraphs 1, 6–11 and 14.
- Repeal of disability-based exclusions and restoration without capacity review: paragraphs 16–17 and 59.
- Accessible elections, information, alternatives and independent assessments: paragraphs 18–22 and 57.
- Ballot secrecy, candidacy, public functions and immediate obligations: paragraphs 23–27.
- Assistance controlled by the voter and protection against substitution: paragraphs 28–31.
- Public affairs, consultation, diversity and individual support: paragraphs 32–37.
- Political parties and civic associations: paragraphs 38–41.
- Autonomous OPDs, self-representation and enabling conditions: paragraphs 42–45.
- Early and sustained involvement, accessible systems and technology: paragraphs 46–48.
- State duties, OPD independence, resources and protection for dissent: paragraphs 49–50.
- Accountability for the quality and impact of participation: paragraphs 51–53.
- Substantive equality, specific measures, women and awareness: paragraphs 54–56.
- Crisis participation, legal capacity, protection and community inclusion: paragraphs 58–61 and 75.
- Accessible information, privacy and disaggregated data: paragraphs 62–63 and 73.
- International cooperation and independent monitoring: paragraphs 64–65 and 76.
- Legal reform, institutional responsibility and permanent participation: paragraphs 66–68.
- Sustainable, accessible, equitable and proportionate OPD funding: paragraph 69.
- Public accessibility responsibilities and necessary support costs: paragraph 70.
- Consultation expenses, campaign costs and disability-related benefits: paragraph 71.
- Protection against regression and effective remedies: paragraphs 72 and 74.

Preparing a country specific submission

Before filing, confirm the State's treaty and Optional Protocol status, relevant declarations or reservations, and the domestic rules governing the chosen remedy. Identify the exact legislative provision or practice, the responsible authority and the persons or constituencies affected. Cite the treaty obligation first, then the GC11 paragraph explaining its application, then the evidence and remedy sought. (GC11, paras. 16–17, 46, 51, 59, 63 and 74; Optional Protocol, arts. 1–4.)