

WRITTEN SUBMISSION OF THE HUMAN RIGHTS
COALITION JOINED BY SVET TICHÁ (SILENT
WORLD) AND ÚNIA NEVIDIACICH A
SLABOZRAKÝCH SLOVENSKA (SLOVAK BLIND
AND PARTIALLY SIGHTED UNION)

for consideration of Slovakia at the 35th session of the
Committee on the Rights of Persons with Disabilities

SUBMITTING ORGANIZATIONS IN BRIEF

Human Rights Coalition (Ľudskoprávna koalícia)¹ was established in January 2025 and currently includes 22 NGOs and collectives, namely Roma Advocacy and Research Center, eduRoma, Saplinq, Inokraj, Community Foundation Healthy City, collective neon, InTYMYta, Freedom of Choice, Diera do sveta, Garden – Center for Independent Culture, Amnesty International Slovakia, Bez sexizmu, Center for Community Organizing, Centre for the Research of Ethnicity and Culture, Slovak Helsinki Committee, Iniciatíva Inakosť, Bardejov Community Foundation, Laputa/Literárna Bašta, Spolka, Status queer, Vagus and STORM Association.² Coalition's values are based on universal human rights, gender equality, anti-racism, and intersectionality with a goal is to build a strong and sustainable alliance of organizations and collectives that serve to effectively defend human rights for all.

Human Rights Coalition is joined by Svet ticha³ (Silent World) and Únia nevidiacich a slabozrakých Slovenska⁴ (ÚNSS, Slovak Blind and Partially Sighted Union). Main mission of Svet ticha is to systematically address the problems associated with poverty and social exclusion that affect marginalized Roma communities, including through research, protection of human rights, accessible communication and systemic solutions for Deaf Roma and other people with hearing impairments. ÚNSS is a civic association and a charitable and humanitarian organization that brings together Blind and Visually Impaired individuals (BI), their supporters, friends, and parents of BI children, regardless of gender, religious denomination or belief, racial origin, national or ethnic origin, disability, age, political affiliation, or sexual orientation.

This report provides an overview of human rights challenges and recommendations when considering the review of Slovakia at the 35th session of the Committee on the Rights of Persons with Disabilities, specifically in the areas of:

- A) EQUALITY AND NON-DISCRIMINATION (Art. 5 CRPD);**
- B) MULTIPLE AND INTERSECTIONAL DISCRIMINATION OF DEAF AND HARD OF HEARING ROMA (Art. 5, Art. 7, Art. 19, Art. 21, Art. 24, Art. 25 and Art. 30 CRPD);**
- C) SITUATION REGARDING BLIND AND PARTIALLY SIGHTED PERSONS (Art. 9, Art. 21 and Art. 27 CRPD);**
- D) WOMEN WITH DISABILITIES (Art. 6 CRPD);**
- E) SITUATIONS OF RISK AND HUMANITARIAN EMERGENCIES (Art. 11 CRPD);**
- F) FREEDOM FROM TORTURE OR CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT (Art. 15 CRPD);**
- G) ACCESS TO JUSTICE AND FREEDOM FROM EXPLOITATION, VIOLENCE AND ABUSE (Art. 13 and Art. 16 CRPD);**
- H) EDUCATION (Art. 24 CRPD);**
- I) HEALTH (Art. 25 CRPD).**

¹Amnesty International Slovakia: “Human Rights Coalition”, 23 February 2025, available at <https://www.amnesty.sk/human-rights-coalition/>.

² Human Rights Coalition: “Membership of the Coalition”, 2026, available at <https://hrcoalition.sk/%C4%8Dlensk%C3%A9-organiz%C3%A1cie/>.

³ Svet ticha (Silent World): “Something about us”, 2026, available at <https://www.silentworld.sk/en/welcome/>.

⁴ Únia nevidiacich a slabozrakých Slovenska (Slovak Blind and Partially Sighted Union): „Basic information and characteristics of activities“, 2026, available at <https://unss.sk/slovak-blind-and-partially-sighted-union/#clients>.

A) EQUALITY AND NON-DISCRIMINATION (Art. 5 CRPD)

Amendments to the Constitution of the Slovak Republic

1. On 26 September 2025, the National Council of the Slovak Republic (the National Council) approved constitutional amendments with far-reaching consequences for LGBTI+ people and international human rights protection in Slovakia. The constitutional amendments were largely criticized by domestic and international human rights bodies, including UN Special Procedures,⁵ Council of Europe Commissioner for Human Rights,⁶ Venice Commission,⁷ Fundamental Rights Agency of the European Union,⁸ and over 50 civil society organizations.⁹
2. Through the amendments, the Constitution of the Slovak Republic (the Constitution) hereinafter only recognizes “the biologically determined sexes of male and female,”¹⁰ and introduced that “(t)he parents of a child are the mother and the father; the mother of the child is a woman and the father of the child is a man.”¹¹ In addition to discrimination, legal gender recognition, while already extremely difficult to access and unduly restrictive in Slovakia, now may become impossible.¹² In practice erasing the existence of non-binary and intersex people in the Constitution, *“forced sex assignment at birth without flexibility has been found to increase the risk of intersex genital mutilation – a serious human rights violation suffered by intersex children and infants.”*¹³
3. Sexual and reproductive health and rights of children and young people are also hindered by the constitutional amendment, which provides for schools requiring parental approval for learners to access comprehensive sexuality education in schools.¹⁴

⁵ Mandates of the Special Rapporteur on the right to education; 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 the right to privacy; the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity and the Working Group on discrimination against women and girls: *Letter to the Government of the Slovak Republic*, 1 September 20205, OL SVK 2/2025, available at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30299>.

⁶ Council of Europe Commissioner for Human Rights: “Slovak Republic: Parliament should not adopt Constitutional amendments that undermine human rights”, 13 June 20205, available at <https://www.coe.int/en/web/commissioner/-/slovak-republic-parliament-should-not-adopt-constitutional-amendments-that-undermine-human-rights>.

⁷ Council of Europe: Slovak Republic: “Venice Commission issues urgent opinion on the draft amendments to the Constitution, 24 September 2025”, available at <https://www.coe.int/en/web/commissioner/-/slovak-republic-parliament-should-not-adopt-constitutional-amendments-that-undermine-human-rights>.

⁸ European Union Agency for Fundamental Rights: “FRA statement on recent developments affecting fundamental rights in the EU“, 7 October 2025, available at <https://fra.europa.eu/en/news/2025/fra-statement-recent-developments-affecting-fundamental-rights-eu>.

⁹ ILGA-Europe and other organizations: “Joint open letter on new Constitutional amendments adopted in Slovakia”. Joint open letter from 56 organizations addressed to the European Commission, 16 October 2025, available at <https://www.ilga-europe.org/news/joint-open-letter-on-new-constitutional-amendments-adopted-in-slovakia/>.

¹⁰ Constitutional Act No. 460/1992 Coll. Constitution of the Slovak Republic as amended, Art. 52a, available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/1992/460/?ucinost=01.02.2026>.

¹¹ Ibid., Art. 41/2.

¹² ILGA-Europe and other organizations: “Joint open letter on new Constitutional amendments adopted in Slovakia”. Joint open letter from 56 organizations addressed to the European Commission, 2025. Available online: <https://www.ilga-europe.org/news/joint-open-letter-on-new-constitutional-amendments-adopted-in-slovakia/>

¹³ Ibid.

¹⁴ Constitutional Act No. 460/1992 Coll. Constitution of the Slovak Republic as amended, Art. 41/7, available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/1992/460/?ucinost=01.02.2026>.

4. Last, but not least, the recently adopted amendments to the Constitution of the Slovak Republic, namely Art. 6 and Art. 7 stating that the Slovak Republic “retains its sovereignty in particular in matters of national identity, consisting in particular of fundamental cultural and ethical issues [...]”, risk being in conflict with Art. 27 of the Vienna Convention on the Law of Treaties.¹⁵ As these terms lack clear legal definition, there is further risk of violation of human rights, supremacy of international and European human rights law and standards or risk that the Slovak authorities will “disapply specific rights because they touch upon ‘national identity’.”¹⁶ In November 2025, the European Commission launched infringement proceedings against Slovakia in connection with the constitutional amendments.¹⁷ In their last concluding observations on Slovakia in April 2026, the Human Rights Committee also noted their concern “*that the concept of “national identity”, if interpreted without sufficient clarification, can create serious uncertainty regarding the relationship between the Covenant and domestic law and potentially affect legal certainty and the effective protection of Covenant rights.*”¹⁸

Recommendations:

- **Repeal or fundamentally revise the amendments of the Constitution of the Slovak Republic adopted in September 2025 in order to bring the Constitution of the Slovak Republic in full conformity with international human rights law and standards, including in the area of non-discrimination against LGBTI+ people.**
- **Ensure that education includes mandatory and age-appropriate education programmes in school curricula on sexual and reproductive health and rights for all children. In particular, education programmes should integrate a special focus on eliminating sexual and gender stereotypes that might hinder access to human rights for LGBTI+ children and youth.**
- **Adopt legislation to enable legal gender recognition in line with international human rights standards; set clear, professional, and respectful standards of healthcare for transgender and intersex persons in accordance with the recommendations of the WHO and relevant professional societies.**

¹⁵ Mandates of the Special Rapporteur on the right to education; 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 the right to privacy; the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity and the Working Group on discrimination against women and girls: *Letter to the Government of the Slovak Republic*, 1 September 20205, OL SVK 2/2025, p. 2, available at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30299>.

¹⁶ Council of Europe Commissioner for Human Rights: “Slovak Republic: Parliament should not adopt Constitutional amendments that undermine human rights”, 13 June 20205, available at <https://www.coe.int/en/web/commissioner/-/slovak-republic-parliament-should-not-adopt-constitutional-amendments-that-undermine-human-rights>.

¹⁷ Euractiv: “Commission launches infringement procedure against Slovakia over controversial constitutional reform,” 21 November 2025, available at <https://www.euractiv.com/news/commission-launches-infringement-procedure-against-slovakia-over-anti-lgbtq-constitutional-reform/>.

¹⁸ CCPR/C/SVK/CO/5, para. 5.

B) MULTIPLE AND INTERSECTIONAL DISCRIMINATION OF DEAF AND HARD OF HEARING ROMA (Art. 5, Art. 7, Art. 19, Art. 21, Art. 24, Art. 25 and Art. 30 CRPD)

5. Deaf and Hard of Hearing Roma face multiple and intersectional forms of discrimination based on disability, ethnic origin, poverty, territorial segregation, and language deprivation. Slovakia does not address multiple and intersectional discrimination of Deaf and Hard of Hearing Roma through specific policies, methodologies, or data collection.¹⁹ According to a study conducted in 2024 by Svet ticha (Silent World) together with Zdravé Regióny (Healthy Regions), the situation of Deaf and Hard of Hearing Roma living in excluded communities is considerably overlooked in Slovakia.²⁰ The study covered 195 Slovak towns, out of which 123 towns included Deaf and Hard of Hearing Roma inhabitants (494 persons in the study, out of which 382 were Roma children).²¹ Over a fifth of persons in the study never visited a specialized medical service until they were 18 years old.²²
6. Through lack of accessible communication, Slovakia effectively and systematically denies Deaf Roma children access to education, healthcare and dignity. Main challenges include systemic lack of early identification, communication support and coordinated services in excluded Roma communities. More than 70% of the identified Deaf and Hard of Hearing Roma in the study were located in the Prešov Region, and approximately one-fifth in the Košice Region, both in Eastern Slovakia. National policies however do not include any specific regional model for Deaf and Hard of Hearing Roma children.²³

Systemic lack of accessible communication

7. Most serious finding of the study by Svet ticha and Zdravé Regióny is that over 13 % Deaf and Hard of Hearing Roma in the study lacked any functional language and thus cannot effectively express their needs, understand healthcare, learn, defend themselves against violence, or participate in decisions that affect them.²⁴ Further, only 6.3% of children covered by the study use Slovak Sign Language independently or in combination with other means of communication, showing that Slovak Sign Language is not realistically available in these communities as a tool for inclusion.²⁵ Slovakia did not codify or standardize Roma Sign Language. Barriers to accessible communication impact access to services, healthcare, education and transportation and negatively affect possibilities for effective communication with family members and life in the community. The absence of early language intervention thus constitutes a violation of the child's best interests and of the child's right to express their views in an inclusive manner. Slovakia does not sufficiently support access to Sign Language identity or to Romani cultural identity in an accessible form.²⁶ The combination

¹⁹ Information provided by Svet ticha (Silent World), June 2026.

²⁰ Information provided by Svet ticha (Silent World), June 2026.

²¹ Svet ticha: *Od jazykovej izolácie k inklúzii* (From Language Isolation to Inclusion), 2025, p. 30, available in Slovak at https://www.silentworld.sk/wp-content/uploads/2025/03/ROMOVIA-A-ICH-MIESTO_A5.pdf.

²² Ibid., p. 28.

²³ Information provided by Svet ticha (Silent World), June 2026.

²⁴ Svet ticha: *Od jazykovej izolácie k inklúzii* (From Language Isolation to Inclusion), 2025, p. 39, available in Slovak at https://www.silentworld.sk/wp-content/uploads/2025/03/ROMOVIA-A-ICH-MIESTO_A5.pdf.

²⁵ Information provided by Svet ticha (Silent World), June 2026, based on evaluation of data collection on people with hearing impairments from the excluded Roma communities, Healthy Regions and Silent World, August–September 2024. The most commonly used language among people under 18, N=382. The category “no language” includes communication through sounds and gestures without a functional language.

²⁶ Information provided by Svet ticha (Silent World), June 2026.

of social exclusion, language deprivation, and low educational attainment of Deaf and Hard of Hearing Roma children then further deepens their isolation.²⁷ In addition, current school curriculum in Slovakia does not include information on Deaf and Hard of Hearing Roma, neither do schools provide information focused on culture and language of the Deaf community or Deaf and Hard of Hearing role models.²⁸

Systemic lack of access to healthcare

8. Around 50% of children covered by the study visit a general ENT medical professional, but only about one-fifth had a contact with an ENT phoniatriest.²⁹ More than 42% of children do not have access to a hearing aid. Main identified barriers in access to healthcare include a lack of access to professionals, travel costs, challenges in communicating with a specialist or keeping hearing devices in working order.³⁰ In addition, Deaf and Hard of Hearing Roma report on language barriers in accessing healthcare specialists in case their primary language is Hungarian that the specialist does not speak (such as many medical professionals in Bratislava, the capital).³¹

Recommendations:

- **Create a national identification and support mechanism for Deaf and Hard of Hearing Roma, including by introduction of an ethical, voluntary, and community-mediated mapping of Deaf and Hard of Hearing Roma children in excluded communities and establish links between paediatricians, ENT/phoniatriests, schools, health support assistants, social services, and local governments.**
- **Implement a program to prevent language deprivation, including by funding early communication support, family courses in Slovak Sign Language, visual communication aids, and on-site support directly in communities.**
- **Support research, documentation, and future standardization of naturally occurring communication systems used by Deaf Roma.**
- **Ensure accessibility to healthcare, including for Roma children with disabilities, including by establishing accessible and inclusive procedures for scheduling appointments, interpretation, diagnosis, prescribing, and maintenance of assistive devices and remove barriers to travel and communication with specialists.**
- **Involve Deaf and Hard of Hearing Roma in decision-making, including by creation of a participatory platform for Deaf and Hard of Hearing Roma and their families, involving them in the development of methodologies, data collection, and public policies.**

²⁷ Svet ticha: *Od jazykovej izolácie k inklúzii* (From Language Isolation to Inclusion), 2025, p. 21, available in Slovak at https://www.silentworld.sk/wp-content/uploads/2025/03/ROMOVIA-A-ICH-MIESTO_A5.pdf.

²⁸ Ibid., p. 22.

²⁹ Ibid., p. 32.

³⁰ Information provided by Svet ticha (Silent World), June 2026.

³¹ Svet ticha: *Od jazykovej izolácie k inklúzii* (From Language Isolation to Inclusion), 2025, p. 40, available in Slovak at https://www.silentworld.sk/wp-content/uploads/2025/03/ROMOVIA-A-ICH-MIESTO_A5.pdf.

C) SITUATION REGARDING BLIND AND PARTIALLY SIGHTED PERSONS (Art. 9, Art. 21, Art. 27 CRPD)

Accessibility

12. Slovakia has significantly improved legislation³² on the accessibility of information and services available online, covering the areas of public administration, transportation, financial services and banking and the publication of electronic documents. The Council for Media Services has been established, which is responsible for overseeing the production, share, and distribution of multimodal broadcasting, which also includes subtitles and interpretation into Slovak Sign Language and audio description. The implementation of legal regulations and standards is gradual, taking into account the specified transitional provisions. In some cases, newly installed equipment and newly established services are required to be accessible by 2030.³³
13. However, weak oversight by public authorities and insufficient enforcement of legal regulations remains a challenge to accessibility. Information systems that do not meet accessibility requirements continue to be put into operation and remain in use in public administration and in public universities. In addition, the responsible authority for broadcasting, the Council for Media Services, does not engage in sufficient oversight, resulting in that programs produced with subtitles or audio commentary are not fully transmitted by some providers to the public.³⁴

Employment

14. Slovakia provides disability pension as a support scheme for persons with disabilities. Current legislation covering disability pension however does not clearly state that receiving such benefit would not be a reason for reduction of financial compensation for employed people with disabilities, including Blind people and people with visual impairments.³⁵

Recommendations:

- **Ensure that electronic documents produced by public administration meet accessibility requirements and carry out appropriate monitoring and oversight to ensure compliance with regulations on the accessibility of public administration information.**

³² Slovakia, Act No. 95/2019 Coll. on Information Technology in Public Administration; Decree No. 78/2020 Coll. on Standards for Information Technology in Public Administration; Decree No. 546/2021 Coll., amending Decree No. 78/2020 Coll. on Standards for Information Technology in Public Administration; Act No. 131/2002 Coll. on Higher Education Institutions; Technical Standard: Accessibility Requirements for ICT Products and Services STN EN 301 549 v3.2.1; Act No. 351/2022 Coll. on the Accessibility of Products and Services for Persons with Disabilities; Decree No. 65/2025 of the Office for the Regulation of Electronic Communications and Postal Services, Establishing Details Regarding Service Quality Indicators; Government Regulation No. 282/2023, Z. z., establishing technical requirements for the accessibility of products for persons with disabilities; Government Regulation No. 283/2023, establishing requirements for the accessibility of services for persons with disabilities, functionality criteria, and criteria for assessing undue burden; Ministry of Finance Decree No. 55/2014 on Standards for Public Administration Information Systems), the law implements the WCGA 2.1 recommendations and EU Directive 2016/2102 on the accessibility of websites and mobile applications of public institutions.

³³ Information provided by ÚNSS, June 2026.

³⁴ Ibid.

³⁵ Ibid.

D) WOMEN WITH DISABILITIES (Art. 6 CRPD)

15. Slovakia has not yet adopted any specific policy, strategy or action plan aimed at women with disabilities that would systematically address multiple and intersectional discrimination they experience.
16. Slovakia currently has two parallel strategic documents – the *National Programme for the Development of Living Conditions of Persons with Disabilities*³⁶ and the *National Strategy for Gender Equality and Equal Opportunities 2021–2027*.³⁷ However, these documents are not systematically aligned with regard to the situation of women with disabilities. The National Strategy for Gender Equality and Equal Opportunities acknowledges that equal opportunities for vulnerable groups, including persons with disabilities, are only partially addressed.³⁸ Furthermore, the National Programme for the Development of Living Conditions of Persons with Disabilities does not include gender-sensitive measures or measurable indicators addressing the specific situation of women with disabilities.

Recommendations:

- **Adopt within a specified timeframe, a dedicated action plan or strategic framework on women and girls with disabilities, developed in close consultation and active involvement of women and girls with disabilities and their representative organisations.**

E) SITUATIONS OF RISK AND HUMANITARIAN EMERGENCIES (Art. 11 CRPD)

Measures to ensure inclusion of persons with disabilities

17. In order to assess the protection of the rights of persons with disabilities in the context of international protection³⁹ and temporary protection,⁴⁰ Human Rights Coalition requested

³⁶ Ministry of Labour, Social Affairs and Family of the Slovak Republic: *The National Programme for the Development of Living Conditions of Persons with Disabilities 2021–2030*, available in Slovak at <https://www.employment.gov.sk/files/sk/rodina-socialna-pomoc/tazke-zdravotne-postihnutie/kontaktne-miesto-prava-osob-so-zdravotnym-postihnutim/dokumenty-3/narodny-program-rozvoja-zivotnych-podmienok-osob-so-zdravotnym-postihnutim-roky-2021-2030.pdf>.

³⁷ Ministry of Labour, Social Affairs and Family of the Slovak Republic: *The National Strategy for Gender Equality and Equal Opportunities 2021–2027*, available in Slovak at <https://www.employment.gov.sk/files/sk/ministerstvo/spolocny-sekretariat-vyborov/vybor-rodovu-rovnost/dokumenty-udalosti/strategia-rovnosti-z-m-2021-27.pdf>.

³⁸ „The Strategy primarily addresses equal opportunities from the perspective of gender equality. Equal opportunities for other population groups, such as older persons and persons with disabilities, are addressed only partially and not comprehensively in the chapter “Inclusion of Vulnerable Groups and Multiple Discrimination against Women and Girls”. While the Strategy acknowledges the intersection of different forms of discrimination, it does not systematically address equal opportunities from the perspective of vulnerable groups. The Strategy therefore recognizes that this issue warrants a separate strategic framework.” Ministry of Labour, Social Affairs and Family: *The National Strategy for Gender Equality and Equal Opportunities 2021–2027*, p. 4.

³⁹ Under Section 2(a) of Act No. 69/2026 Coll. on International Protection and on Amendments to Certain Acts “international protection comprises **refugee status** granted on the grounds of persecution and **subsidiary protection** granted on the grounds of a real risk of serious harm.” Available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2026/69/20260612>.

⁴⁰ Under Section 58(1) of Act No. 69/2026 Coll. on International Protection and Amendments to Certain Acts, “temporary protection is granted in the event of a mass influx or imminent mass influx of third-country nationals for the

information on the collection of disability-disaggregated data, methodological guidance governing the provision of support and reasonable accommodation, accessibility of procedures and facilities and specific safeguards for women and children with disabilities.

18. The Ministry of Interior of the Slovak Republic (Ministry of Interior) stated in its response⁴¹ that applicants for international protection and persons seeking temporary protection undergo an initial assessment aimed at identifying vulnerabilities, including disability-related needs, and determining necessary support measures. However, no specific records are maintained regarding the number or types of disabilities among applicants for international protection or applicants for temporary protection.⁴²
19. Ministry of Interior further confirmed that it has not adopted specific methodological guidelines, internal regulations or other documents concerning persons with disabilities in procedures relating to international protection or temporary protection.⁴³ Likewise, no specific methodological guidance or procedures have been adopted for women with disabilities and children with disabilities and individual needs are assessed on a case-by-case basis.⁴⁴
20. The absence of formalised procedures and specific safeguards raise concerns regarding the consistency and effectiveness of measures aimed at ensuring accessibility, reasonable accommodation, accessible information and appropriate support for persons with disabilities seeking or receiving international protection or temporary protection. The absence of disability-disaggregated data further limits the ability to monitor the situation of persons with disabilities and assess whether their human rights are effectively protected.
21. Human Rights Coalition also requested information from the Ministry of Interior concerning accessible warning systems, accessible emergency information, specific measures for persons with disabilities, and the involvement of organisations of persons with disabilities in emergency preparedness.
22. In its response, Ministry of Interior referred to consultations held in 2023 on the establishment of a voluntary register of persons with specific needs intended to facilitate emergency communication and assistance during emergencies. Representatives of organisations of persons with disabilities participated in these consultations, and the outcomes were incorporated into the updated *National Programme for the Development of Living Conditions of Persons with Disabilities 2021–2030* (National Programme).⁴⁵

purpose of protecting them from armed conflict, endemic violence, the consequences of a humanitarian disaster, or serious and systematic human rights violations, or where they have become victims of such violations in their country of origin and are unable to return to safe and stable conditions due to the continuing situation in that country” Available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2026/69/20260612>.

⁴¹ Ministry of Interior of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 10/2026.MOI, response received on 16 June 2026.

⁴² Ibid.

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ Ministry of Interior of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 08/2026.MOI, response received on 29 June 2026.

23. Although the National Programme⁴⁶ envisages measures to improve alternative access to emergency services and the provision of warning messages adapted to the specific needs of persons with disabilities, the information available does not allow for an assessment of whether these measures have been implemented in practice or are effectively available during emergencies.

Recommendations:

- **Adopt specific methodological guidelines and procedures for addressing the needs of persons with disabilities in procedures concerning international protection and temporary protection.**
- **Ensure regular monitoring of the situation of persons with disabilities in reception and accommodation facilities and evaluate the effectiveness of measures adopted to address their needs.**
- **Ensure that warning and emergency communication is accessible to all persons with disabilities, including through accessible communication formats and technologies, and regularly monitor their practical implementation in consultation with organisations of persons with disabilities.**

F) FREEDOM FROM TORTURE OR CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT (Art. 15 CRPD)

24. In 2023, Slovakia introduced a comprehensive legal framework regulating the use of restraint measures in healthcare settings. Under Section 9b(1) of Act No. 576/2004 Coll. on Healthcare, Services Related to the Provision of Healthcare and Amending Certain Acts (the Healthcare Act), restraint measures may only be used for the time strictly necessary to eliminate an immediate threat and only where less restrictive measures, including verbal de-escalation techniques, have failed.⁴⁷ The legislation defines mechanical restraint, pharmacological restraint and seclusion, requires that restraint measures are authorised by qualified healthcare professionals, regularly reviewed, documented and recorded in a restraint register, and provides for staff training and external notification requirements.⁴⁸ Since 1 January 2025, the use of net beds has been prohibited.⁴⁹

25. Similarly, Section 10(1) of Act No. 448/2008 Coll. on Social Services and Amending Act No. 455/1991 Coll. on Trade Licensing (the Trade Licensing Act), as amended (the Social Services Act) provides that restraint measures may only be used where there is an immediate threat to life or health of the recipient of a social service or other persons and

⁴⁶ Ministry of Labour, Social Affairs and Family of the Slovak Republic: *National Programme for the Development of Living Conditions of Persons with Disabilities 2021–2030*, available in Slovak at <https://www.employment.gov.sk/sk/rodina-socialna-pomoc/tazke-zdravotne-postihnutie/kontaktne-miesto-prava-osob-so-zdravotnym-postihnutim/dokumenty-3.html>.

⁴⁷ Slovakia, Act No. 576/2004 Coll. on Healthcare, Services Related to the Provision of Healthcare and on Amendments to Certain Acts, Section 9b (1), available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2004/576/>.

⁴⁸ Ibid., Section 9b(2)-(19).

⁴⁹ Ibid., Section 79(1)(bp).

only for the time strictly necessary to eliminate such threat.⁵⁰ The legislation establishes a preference for non-physical forms of intervention, requires documentation and registration of every use of restraint, and provides for notification and oversight mechanisms.⁵¹

26. Despite these safeguards, findings of the National Preventive Mechanism (NPM) indicate persistent shortcomings in implementation.⁵² As the NPM constitutes one of the mandates of the Commissioner for Persons with Disabilities, the Commissioner's 2025 review of Slovakia identified that some psychiatric facilities do not maintain restraint registers and records in accordance with legal requirements and lack internal rules governing the use of restraint measures, despite legal obligation to adopt such rules.⁵³ The NPM further identified deficiencies in patient monitoring and in the regular review of the continued necessity of restraint measures.⁵⁴
27. The NPM further reported that restraint measures are frequently used in a preventive manner, based on assumptions regarding a person's potential future behaviour rather than an immediate threat.⁵⁵ This raises concerns regarding compliance with the legal requirement that restraints be used only in response to a direct and immediate risk. Risk-assessment tools are reportedly used only exceptionally and regular reassessments of the necessity of continued restraint are often not carried out.⁵⁶ The NPM also raised concerns regarding the use of restraint measures in multi-bed rooms. According to the NPM, patients subjected to restraint measures are often required to meet their basic physiological needs in the presence of other patients, violating privacy and dignity.⁵⁷
28. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT)'s findings from its 2023 visit illustrate the continued use of net beds prior to the entry into force of the statutory prohibition.⁵⁸ CPT recommended that Slovak authorities take necessary steps to ensure that net-beds are indeed withdrawn from service in all psychiatric hospitals by 1 January 2025.⁵⁹ CPT also expressed concerns regarding use of electroconvulsive therapy (ECT), noting that in one psychiatric department, ECT was used frequently and not always in accordance with national guidelines.⁶⁰

⁵⁰ Slovakia, Act No. 448/2008 Coll. on Social Services and Amending Act No. 455/1991 Coll. on Trade Licensing (the Trade Licensing Act), as amended, Section 10(1), available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2008/448/>.

⁵¹ Ibid., Section 10(4)–(6).

⁵² Commissioner for Persons with Disabilities: *Annual Report on the Activities of the Commissioner for Persons with Disabilities for the Year 2025*, 6. Restrictive measures, p. 273, available in Slovak at https://www.komisarprezdravotnepostihnutych.sk/Komisarka/media/Spravy-o-cinnosti/2025/SPRAVA_2025_public_view.pdf.

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ Ibid.

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT): *Report to the Slovak Government on the visit to the Slovak Republic carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 28 November to 9 December 2023*, 10 April 2025, paras 265 and 275, available at <https://rm.coe.int/1680b52d45>.

⁵⁹ Ibid.

⁶⁰ European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT): *Report to the Slovak Government on the visit to the Slovak Republic carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 28 November to 9 December 2023*, Executive Summary, available at <https://rm.coe.int/1680b52d47>.

29. At the same time, findings of the NPM indicate that significant shortcomings remain in the implementation of safeguards governing other forms of restraint, including documentation, monitoring, regular reassessment, and the protection of patients' dignity and privacy.
30. Human Rights Coalition requested information from the Social Inspection Authority⁶¹ on complaints alleging breaches of Section 10 of the Social Services Act, including the unlawful or disproportionate use of physical and non-physical restraint measures, as well as information on the handling and outcomes of such complaints.
31. The Social Inspection Authority reported that, since its establishment on 1 November 2022, it had received 72 complaints alleging possible breaches of Section 10 of the Social Services Act.⁶² All of these complaints were considered to warrant supervisory inspections. As of the date of the response, 66 supervisory inspections had been initiated, 53 had been completed, and violations of Section 10 had been identified in 24 cases.⁶³
32. The Social Inspection Authority also stated that it does not collect data on the specific types of disabilities of the persons concerned.⁶⁴ However, when classified according to the type of social service involved, 71 of the 72 complaints concerned social services provided to persons in adverse social situations due to "severe disabilities, adverse health conditions or old age, including homes for older persons, care service facilities, social service homes and specialised facilities. One complaint concerned a crisis intervention service (a shelter and overnight shelter)."⁶⁵
33. The Social Inspection Authority further stated that, since 2022, it had conducted supervisory inspections of 141 social service providers in relation to compliance with Section 10 of the Social Services Act.⁶⁶ Violations were identified in 44 cases, while no violations were found in 39 cases. Supervisory inspections concerning the remaining providers were still ongoing.⁶⁷

Justice and reparation for victims of forced sterilizations

34. While Roma women and girls were not the only victims of coerced sterilization in the periods of 1966-1989 and in 1990-2004, "*Roma women have been particularly at risk of such practices, seemingly driven by discriminatory attitudes against this minority.*"⁶⁸ In November 2021, the Government issued a formal Apology of the Government of the Slovak Republic for sterilization of women in violation of the law.⁶⁹ In November 2025, opposition

⁶¹ Slovakia, Act No. 345/2022 Coll. on Social Inspection and on Amendments to Certain Acts, Section 2, available in Slovak at <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2022/345/>.

⁶² Social Inspection Authority, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 05/2026.MOL, response received 23 June 2026.

⁶³ Ibid.

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Ibid.

⁶⁷ Ibid.

⁶⁸ Council of Europe Commissioner for Human Rights: *Letter to the Slovak authorities*, CommHR/DM/sf 026-2021 12 July 2021, available at <https://rm.coe.int/letter-to-mr-eduard-heger-prime-minister-of-the-%20slovak-republic-and-ms/1680a332a3>.

⁶⁹ The Slovak Spectator: "Government apologises for coercive sterilisation of women," 24 November 2021, available at <https://spectator.sme.sk/politics-and-society/c/government-apologises-for-sterilisation-of-women>.

MPs tabled a legislative draft to compensate victims of forced sterilizations, that would award victims 12 000 EUR as compensation. As of June 2026, the draft has been tabled for discussion at the Parliament.⁷⁰ In their review of Slovakia in 2016, European Commission against Racism and Intolerance (ECRI) reported on Government's plans to introduce a bill aiming at establishing compensation mechanism for Roma victims of forced sterilization, but this yet not had been consulted with victims or civil society.⁷¹

Intersex children

35. In addition to erasure of existence of non-binary and intersex people through the amendments to the Constitution (see para 2), in Slovakia, there is no legal prohibition of non-medically necessary sex assignment treatment or surgeries on the sex characteristics with regards to intersex children.⁷² No data exist on number of such procedures, as well as no guidelines for intersex healthcare are currently available.⁷³

Recommendations:

- **Ensure effective implementation of the safeguards governing the use of restraint measures, including regular monitoring, periodic reassessment of the necessity of restraint, comprehensive documentation, and compliance with record-keeping obligations.**
- **Strengthen the use of non-coercive and rights-based alternatives to restraint, including de-escalation techniques, individualised support measures and regular staff training.**
- **Adopt concrete measures and legislation for reparation and compensation of victims of forced sterilizations. Provide and inclusive and accessible support for survivors, including survivors with disabilities, in order to access remedies without further retraumatization.**
- **Adopt legislation that explicitly prohibits any medical intervention on a person's sex characteristics without their prior free and informed consent and provide appropriate rights-based guidelines, protocols and training for healthcare professionals based on international human rights standards, including with regards to intersex person's right to bodily integrity. Ensure that no child is subjected to unnecessary surgery or treatment and that children are involved, to the greatest extent possible, in decision-making about their treatment and care.**

⁷⁰ Proposal by a group of members of the National Council of the Slovak Republic to pass a law on one-time financial compensation for persons sterilized in violation of the law and to amend Slovak National Council Law No. 71/1992 Coll. on court fees and fees for extracts from the criminal register, as amended, available in Slovak at <https://www.nrsr.sk/web/Default.aspx?sid=zakony/cpt&ZakZborID=13&CisObdobia=9&ID=1097>.

⁷¹ European Commission against Racism and Intolerance (ECRI): *Report on the Slovak Republic (Seventh Monitoring Cycle)*, 11 June 2026, p. 74, available at <https://rm.coe.int/seventh-report-on-the-slovak-republic/48802c1c7d>.

⁷² Ibid., p. 6.

⁷³ Ibid.

G) ACCESS TO JUSTICE AND FREEDOM FROM EXPLOITATION, VIOLENCE AND ABUSE (Art. 13 and Art. 16 CRPD)

36. Although Slovakia has introduced legislative provisions on procedural accommodations for particularly vulnerable victims, including victims with disabilities⁷⁴ and has developed several training programmes and methodological guidelines for police officers and other criminal justice professionals,⁷⁵ implementation of these measures is not systematically monitored. Information provided by the Ministry of Justice confirms that Slovakia does not collect data on the use of procedural accommodations in criminal proceedings, including the number of persons with disabilities who received them, the types of accommodations provided or their effectiveness in ensuring equal participation in criminal proceedings.⁷⁶
37. In *J.S. v. Slovakia*,⁷⁷ the European Court of Human Rights found that Slovak authorities failed to investigate allegations of domestic violence in a gender-sensitive manner, relying on a formalistic assessment of the evidence and failing to avoid gender stereotypes. Similarly, the Committee on the Rights of Persons with Disabilities, in its decision in *Černáková v. Slovakia*⁷⁸ found that the Slovakia failed to ensure effective access to justice for a woman with intellectual disability who alleged abuse in an institutional setting. These findings indicate that, despite existing legislation and training activities, women with disabilities may continue to encounter significant barriers in accessing justice in practice.
38. Slovakia does not systematically collect or publish disaggregated data on victims of violence with disabilities, making it impossible to assess the prevalence of violence against women and girls with disabilities or to evaluate the effectiveness of measures adopted under Articles 13, 16 and 31 of the Convention. Information obtained from the Ministry of Justice⁷⁹ and the Ministry of Interior⁸⁰ in response to requests for information confirm that neither institution maintains statistics identifying victims with disabilities, including women with disabilities. Consequently, the authorities are unable to provide data on the number of victims with disabilities of sexual or domestic violence, the number of criminal complaints,

⁷⁴ Procedural accommodations include the possibility of conducting certain procedural acts by videoconference, ensuring that interviews are conducted in a sensitive, professional and, where possible, non-repetitive manner, and the provision of Sign Language interpretation for persons with hearing impairments. Ministry of Justice of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 11/2026.MOJ, response received 19 June 2026.

⁷⁵ Police officers and investigators have received training on working with particularly vulnerable victims, including persons with disabilities, on gender-based violence and victim communication, complemented by methodological guidelines on interviewing particularly vulnerable victims. Ministry of Interior of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 08/2026.MOI, response received 29 June 2026.

⁷⁶ Ministry of Justice of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 11/2026.MOJ, decision received 19 June 2026. The Ministry of Justice of the Slovak Republic in the Decision on the Partial Refusal to Disclose Information stated that it does not maintain statistical data on the application of individual procedural measures or procedural safeguards in criminal proceedings involving victims with disabilities. Therefore, it is unable to provide statistical data on the use of procedural accommodations in such proceedings.

⁷⁷ European Court of Human Rights, *J.S. v. Slovakia*, Application No. 35767/23, Judgment, 22 January 2026.

⁷⁸ CRPD/C/34/D/78/2020.

⁷⁹ Ministry of Justice of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 11/2026.MOJ, decision received 19 June 2026.

⁸⁰ Ministry of Interior of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 09/2026.MOI, response received 16 June 2026.

the application of procedural accommodations in criminal proceedings, or the number of final convictions in cases where the victim was a person with a disability.

39. Instead, the Ministry of Interior provided only aggregated statistics on offences committed against “dependent persons” under section 127(9) of the Criminal Code.⁸¹ Under Slovak law, however, a dependent person is defined on the basis of a relationship of dependence on the perpetrator, including dependency arising from care, financial support, maintenance or upbringing, rather than on the existence of a disability. This category therefore includes persons without disabilities and, conversely, excludes many persons with disabilities who do not meet the statutory definition of a dependent person. These statistics cannot be used to identify victims with disabilities, women with disabilities, or to assess the prevalence of violence against persons with disabilities as required under the CRPD.
40. The Ministry of Labour, Social Affairs and Family further confirmed that it does not collect data on the accessibility of shelters and safe houses for women with disabilities and is therefore unable to determine how many of these victim support services are accessible to them.⁸²
41. The absence of disability-disaggregated data across the justice and victim support systems significantly limits Slovakia’s ability to identify protection gaps, monitor equal access to support services, and develop evidence-based policies for women and girls with disabilities.

Recommendations:

- **Ensure effective implementation of procedural accommodations for persons with disabilities throughout criminal proceedings by establishing a monitoring mechanism to collect and publish data on the use, type and effectiveness of procedural accommodations.**
- **Establish a comprehensive system for collecting and publishing disability-disaggregated data on violence against persons with disabilities, including women and girls with disabilities.**
- **Ensure that shelters, safe houses and all victim support services are fully accessible to women and girls with disabilities and systematically collect and publish information on their accessibility for women with disabilities.**

H) EDUCATION (Art. 24 CRPD)

42. Slovakia has not yet ensured an inclusive education system at all levels, as required by Article 24 of the Convention. The right to inclusive education for all children and students with disabilities was not available in Slovakia, the segregated education system persisted for

⁸¹ Ibid.

⁸² Ministry of Labour, Social Affairs and Family of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 06/2026.MOL, response received 1 July 2026.

children with disabilities, and Roma children continue to be placed in segregated schools for children with intellectual disabilities.

43. The persistence of special schools and special classes remained a structural feature of the education system. Slovakia's own policy documents do not envisage complete transition away from special schools.⁸³ This is inconsistent with General Comment No. 4 and the CRPD Committee's previous recommendation⁸⁴ that Slovakia adopt a legally binding plan for transition from segregated schools to inclusive education at all levels.
44. The continued existence and use of special schools and special classes meant that many children with disabilities were still educated separately from their peers. Between school years 2021/2022 and 2025/2026, the number of pupils attending special primary schools and special classes for children with "mild intellectual disabilities" remained virtually unchanged at approximately 25,000 pupils, while the number of special primary schools increased from 243 to 249.⁸⁵ During the same period, the number of children attending "special kindergartens" increased from 1,886 to 2,382 (+26%) while the number of such kindergartens increased from 84 to 101.⁸⁶
45. According to the Court of Justice of the European Union, Roma children were "*disproportionately placed in special schools and special classes for children with intellectual or other disabilities.*"⁸⁷ In February 2025, the European Court of Human Rights (ECtHR) further found in *Salay v. Slovakia* a violation of Article 14 of the European Convention on Human Rights in conjunction with Article 2 of Protocol No. 1. ECtHR identified concerns regarding the risk of culturally biased diagnostic testing and inadequate safeguards to ensure that "*the State considered the special needs of Roma pupils.*"⁸⁸
46. Slovak Government's response to *Salay v. Slovakia* judgment consisted in the dissemination of the judgment to courts and public authorities.⁸⁹ No comprehensive and efficient measures of legislative, institutional or diagnostic reform has yet been adopted. The National Project "Support for Educational Opportunities," financed through EU funds, acknowledged that some children have been incorrectly "diagnosed with mild intellectual disability" and inappropriately placed in the special education stream. However, as a small-scale and time-limited project, it does not address the structural causes of segregation, including culturally biased assessment procedures, inadequate safeguards and the absence of systematic review mechanisms. Nor does it constitute the legally binding and time-bound transition from

⁸³ CRPD/C/SVK/2-3, para. 114.

⁸⁴ CRPD/C/SVK/CO/1, para. 68.

⁸⁵ Centre of Scientific and Technical Information of the Slovak Republic (CVTI SR): Statistical Yearbook – Special Schools and corresponding time-series tables for children in special primary schools and classes for children with "mild mental disabilities" (school years 2021/22–2025/26), available in Slovak at https://www.cvtisr.sk/cvti-sr-vedecka-kniznica/informacie-o-skolstve/statistiky/casove-rady.html?page_id=9724

⁸⁶ CVTI SR: Statistical Yearbook – Kindergarten statistics, and corresponding time-series table for children in special kindergartens (school years 2021/22–2025/26), available in Slovak at https://www.cvtisr.sk/cvti-sr-vedecka-kniznica/informacie-o-skolstve/statistiky/casove-rady.html?page_id=9724.

⁸⁷ Opinion of Advocate General Ćapeta delivered on 1 August 2025, *European Commission v. Slovak Republic*, Case C-799/23, ECLI:EU:C:2025:621, para V. (1), available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62023CC0799>.

⁸⁸ ECtHR, *Salay v. Slovakia*, Application No. 29359/22, Judgment of 27 February 2025, para. 107, 113.

⁸⁹ Action Plan submitted by the Slovak Republic to the Committee of Ministers, *Communication from the Slovak Republic concerning the case of Salay v. Slovakia*, DH-DD(2026)158E, Application No. 29359/22, 28 January 2026.

segregated to inclusive education previously recommended by the Committee.⁹⁰ The Ministry of Education, Research, Development and Youth of the Slovak Republic (Ministry of Education) confirmed that it has not prepared a dedicated Action Plan for implementation of *Salay v. Slovakia* judgment and instead relies on previously adopted reforms and the National Project Support for Educational Opportunities.⁹¹ The Ministry of Education further noted that, although the diagnostic assessment phase of the National Project Support for Educational Opportunities had been completed, pupils identified through the project had not yet been transferred to mainstream education. At the time of the response, the project was preparing a network of adaptation classes to support their future transition.

47. The Ministry of Education's own monitoring data further confirms the systemic nature of the overrepresentation of Roma children in “special education”. According to the pilot methodology for monitoring segregation risks among pupils with “mild intellectual disability”, 13% of pupils identified as being at risk of segregation have a “diagnosis of mild intellectual disability”, compared with 2% of pupils outside the risk group.⁹² In Medzilaborce district, more than one fifth of all pupils in the dihad been diagnosed with “mild intellectual disability”, illustrating the extreme concentration of such registered diagnoses and raising serious concerns regarding assessment procedures, placement practices and the continuing use of disability labelling as a pathway into segregated education.⁹³
48. Children with physical and sensory disabilities are effectively excluded from mainstream education due to severe, systemic architectural barriers. Monitoring report conducted by the Ministry of Education itself explicitly confirmed that Slovak schools across all levels “do not have technically secured environments for inclusive education in terms of barrier-free status and accessibility.”⁹⁴
49. While the vast majority of school buildings in monitoring report are multi-story (85.9% of primary schools and 99.28% of secondary schools), a mere 4.11% of primary schools and 12.37% of secondary schools are equipped with an elevator. Consequently, in 78.26% of the mapped schools, individuals with limited mobility have challenge to access all areas without additional physical support.⁹⁵ Furthermore, basic hygienic and common facilities remain largely inaccessible: 70.36% of kindergartens, 77.13% of primary schools, and 75.97% of secondary schools do not possess even a single accessible toilet.⁹⁶

⁹⁰ Ministry of Education, Research, Development and Youth of the Slovak Republic: *Národný projekt Podpora vzdelávacích príležitostí (2025–2027) (National Project: Promoting Educational Opportunities)*, available in Slovak at <https://www.minedu.sk/narodny-projekt-podpora-vzdelavacich-prilezitosti/>.

⁹¹ Ministry of Education, Research, Development and Youth of the Slovak Republic, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 03/2026.MOE, response received 1 July 2026.

⁹² Institute of Education Policy: *Pilotná metodika a výsledky monitorovania rizík segregácie žiakov s ľahkým stupňom mentálneho postihnutia vzdelávaných v triedach a školách pre žiakov so zdravotným znevýhodnením za šk. rok 2022/2023 (Pilot Methodology and Results of Monitoring the Risk of Segregation of Students with Mild Intellectual Disabilities Enrolled in Classes and Schools for Students with Disabilities for the 2022–2023 School Year)*, December 2025, p. 12, available in Slovak at <https://www.minedu.sk/data/att/888/36118.602f2c.pdf>.

⁹³ Ibid., p. 8.

⁹⁴ Ministry of Education, Research, Development and Youth of the Slovak Republic: *Mapovanie stavu debarierizácie materských, základných a stredných škôl a prioritizácia škôl (Assessment of the Status of Accessibility Improvements in Preschools, Elementary Schools, and High Schools, and Prioritization of Schools)*, 2022, p. 5, available in Slovak at <https://www.minedu.sk/data/att/0a5/24373.53ab16.pdf>.

⁹⁵ Ibid., p.5-6.

⁹⁶ Ibid., p. 6.

50. Significant concerns also remain regarding the access to the educational materials for Blind and Partially Sighted children, including Braille and tactile graphics, availability of electronic textbooks and educational materials provided in accessible or alternative formats. Insufficient safeguards were in place to ensure early assessment of Braille literacy needs and access to qualified Braille instructions. Challenges also remain with regards to approval of textbooks and teaching materials approved by the Ministry of Education without being in an accessible electronic format or use of older textbooks lacking accessible electronic formats. Concerns persist also regarding lack of school support teams for students needing specific support or having higher support needs and lack of practical training sessions for support teams, including for Blind children and children with visual impairments.⁹⁷
51. Concerns also persist regarding lack of access to inclusive education to Deaf and Hard of Hearing Roma children, including lack of school assistants in elementary schools, lack of access to or malfunctions of hearing aids or schools regulating leaving of hearing aids on school premises, intolerance and exclusion from classmates or communities.⁹⁸
52. The Ministry of Education confirmed that it does not collect data on the number of pupils using Braille, tactile graphics or accessible electronic educational materials. Similarly, it does not collect data on the number of pupils using Slovak Sign Language in education or on schools providing Slovak Sign Language interpretation.⁹⁹

Recommendations:

- **Amend the Education Act to establish an enforceable right to inclusive education consistent with Article 24 CRPD and General Comment No. 4.**
- **Adopt a legally binding, time-bound and adequately funded plan for the transition from segregated educational settings to inclusive education at all levels.**
- **Implement structural reforms following *Salay v. Slovakia*, including:**
 - **reform of diagnostic procedures;**
 - **safeguards against culturally biased assessment;**
 - **mandatory periodic reassessment of all children placed in special education;**
 - **effective pathways for transfer to inclusive education.**
- **Ensure that all children with disabilities receive individualized support measures and reasonable accommodation within the general education system.**

⁹⁷ Information provided by ÚNSS.

⁹⁸ Svet ticha: *Od jazykovej izolácie k inklúzii* (From Language Isolation to Inclusion), 2025, p. 39, available in Slovak at https://www.silentworld.sk/wp-content/uploads/2025/03/ROMOVIA-A-ICH-MIESTO_A5.pdf.

⁹⁹ Ministry of Education, Research, Development and Youth of the Slovak Republic Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 03/2026.MOE, response received 1 July 2026.

- **Guarantee timely access to Braille textbooks, tactile graphics, accessible educational materials and qualified Braille instruction, including through early assessment of Braille literacy needs.**
- **Guarantee inclusive education, including communication and language accommodation, support and services for Deaf and Hard of Hearing children, including Roma children living in excluded communities, from early childhood onwards.**
- **Ensure that all preschool and school facilities are accessible, available and inclusive.**

I) HEALTH (Art. 25 CRPD)

52. Sexual, reproductive and menstrual health of women and girls with disabilities is not addressed as an operational priority in the Government's principal strategic documents. Neither the National Programme for the Development of Living Conditions of Persons with Disabilities for 2014–2020 nor that for 2021–2030 contains specific measures on the subject.¹⁰⁰ None of the three health insurance companies in Slovakia hold analysis or internal documents on the access of women with disabilities to reproductive and gynaecological care.¹⁰¹
53. Responses of the self-governing regions¹⁰² to requests for accessibility-evaluation documents show that no self-governing region holds an audit or evaluation of the

¹⁰⁰ Government of the Slovak Republic: *Národný program rozvoja životných podmienok osôb so zdravotným postihnutím na roky 2021–2030 (National Programme for the Development of Living Conditions of Persons with Disabilities for 2021–2030)*, available in Slovak at <https://www.tsk.sk/buxus/docs/N%C3%A1rodn%C3%BD%20program%20rozvoja%20%C5%BEivotn%C3%BDch%20podmienok%20os%C3%B4b%20so%20zdravotn%C3%BDm%20postihnut%C3%ADm%20na%20roky%202021-2030.pdf> and Government of the Slovak Republic: *Národný program rozvoja životných podmienok osôb so zdravotným postihnutím na roky 2014–2020 (National Programme for the Development of Living Conditions of Persons with Disabilities for 2014–2020)*, available in Slovak at <https://www.mpsvr.sk/files/sk/rodina-socialna-pomoc/tazke-zdravotne-postihnutie/kontaktne-miesto-prava-osob-so-zdravotnym-postihnutim/dokumenty-3/narodny-program-rozvoja-zivotnych-podmienok-osob-so-zdravotnym-postihnutim-roky-2014-2020.pdf>.

¹⁰¹ Všeobecná zdravotná poisťovňa, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 13/2026.HI, response received 7 July 2026; Dôvera zdravotná poisťovňa, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 15/2026.HI, response received 19 June 2026; Únia zdravotná poisťovňa, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 14/2026.HI, response received 25 June 2026.

¹⁰² Banská Bystrica Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 16/2026.VUC, response received 19 June 2026; Prešov Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 17/2026.VUC, response received 12 June 2026; Nitra Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 18/2026.VUC, response received 10 June 2026; Košice Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 19/2026.VUC, response received 19 June 2026; Trenčín Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 20/2026.VUC, response received 22 June 2026; Bratislava Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 21/2026.VUC, response received 16 June 2026; Trnava Self-Governing Region, Response to Request for Information

accessibility of its health facilities. Self-governing regions reported few or no accessibility complaints for 2016–2025: most recorded none, or none within their competence, and the Žilina region recorded a single complaint concerning barrier-free access at one of its facilities. This near-absence of recorded complaints is set against a background in which the responses do not indicate any accessibility-specific or disability-aware complaints mechanism, nor proactive monitoring that would identify accessibility barriers independently of complaints received.

54. The absence of disability-disaggregated data extends to the supervisory level. The Health Care Surveillance Authority (Úrad pre dohľad nad zdravotnou starostlivosťou, ÚDZS), when asked for complaints since 2016 concerning inaccessibility of health services or discrimination against persons with disabilities in the provision of care, informed that no legal provision obliges it to record complaints in this form and that it does not hold such data. Its published annual data on submissions resolved through supervision are not disaggregated by disability.¹⁰³

Recommendations:

- **Integrate sexual and reproductive health of women and girls with disabilities into the National Programme and the strategies of the Ministry of Health, with concrete measures, timelines and indicators, and ensure reasonable accommodation in gynaecological, obstetric and screening services.**
- **Address menstrual health explicitly, including the availability, affordability and accessibility of menstrual products and of accessible information to girls and women with disabilities.**
- **Ensure accessible information and equipment to persons with disabilities, including by provision of health information in Easy-to-Read, Braille and Sign Language.**
- **Establish disaggregated health data across the Ministry of Health, Health Care Surveillance Authority and health insurance companies on preventive check-ups, gynaecological and maternity care, rehabilitation and medical aids.**
- **Introduce systematic accessibility monitoring: a central register and periodic published audits of the accessibility of health facilities in each region, beyond the operating-permit procedure, together with an accessible complaints mechanism.**

under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 22/2026.VUC, response received 19 June 2026; Žilina Self-Governing Region, Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ 23/2026.VUC, response received 12 June 2026.

¹⁰³ Úrad pre dohľad nad zdravotnou starostlivosťou (Health Care Surveillance Authority), Response to Request for Information under Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended, Ref. IZ AISK 26/2026.MOH, response received 23 June 2026.