



To: UN Office of the High Commissioner for Human Rights

From: [NRWC](#) - written by Judy Harrison

Subject: **Submission to [Call for input](#): Annual thematic study on the rights of persons with disabilities – 20th anniversary of the Convention on the Rights of Persons with Disabilities**

Date: 1 September 2026

1. Introduction

1. This submission responds to the call for input to inform the Office of the High Commissioner for Human Rights thematic study on the 20th anniversary of the adoption of the Convention on the Rights of Persons with Disabilities (**CRPD**) to be presented at the sixty-fourth session of the Human Rights Council, in [February-March 2027](#).
2. The [call for input](#) notes that the thematic study requested by the Human Rights Council in its [resolution 61/9](#) (para 11) will examine:

“...lessons learned and challenges in the development of human rights standards and norms over the past twenty years, including how these have been reflected in legislation, policy and institutional frameworks, and their impact on the enjoyment of human rights by persons with disabilities. The study will draw on data, evidence and illustrative examples of progress, good practices and remaining challenges.”
3. The call for input outlines “Key questions and types of input/comments sought”. This is quoted below.

“Key questions and types of input/comments sought

OHCHR welcomes submissions addressing one or more of the following questions:

1. What have been the main lessons learned and challenges in the development of human rights standards and norms over the past twenty years?
2. Please provide examples of how these lessons learned and challenges have been reflected in legislation, policies or institutional frameworks.
3. What impact have these legislation, policies or institutional frameworks had on the enjoyment of human rights by persons with disabilities? Please include, where available, relevant data, indicators or evidence.
4. Please provide concrete examples, including good practices, challenges or lessons learned, that illustrate the implementation and impact of these developments.

When responding, contributors are encouraged to focus on the main areas covered by the Convention, including, as relevant:

- Accessibility;
- Equality and non-discrimination;
- Legal capacity;
- Independent living and inclusion in the community;
- Education;
- Health;
- Employment;
- Access to justice;
- Participation in political and public life; and
- Other rights and themes covered by the Convention.”

2. People with disabilities in RRM+ areas

5. This input relates to:

- women, girls, young people, older people, Indigenous and non-Indigenous people and all people with disabilities in remote, rural, maritime and other non-urban areas (**RRM+ areas**)
- the OHCHR’s four questions, and
- all the main areas covered by the CRPD listed in the request for input above.

2.1 Utilizing opportunities to advance human rights of people with disability in RRM+ areas

6. This input is about using available opportunities to advance the human rights of women, girls, Indigenous and non-Indigenous people and all people with disabilities **in RRM+ areas** through:
 - normative instruments and expressions
 - legislation
 - policies
 - institutional frameworks, and
 - leadership.
7. All of these can better contribute to conceptually, normatively and intersectionally, de-subordinating people with disability located in RRM+ areas.

2.2 Acting on the lived experiences of people with disability in RRM+ areas

8. Currently, many practices relating to normative instruments and expressions, legislation, policies, frameworks and leadership practices apply norms about analysis, process, expression and drafting which make the lived experiences of people with disability in RRM+ areas invisible or peripheral. Examples are at point 3 below.
9. People with disability in RRM+ areas are not receiving intentional and effective solidarity in a wide range of normative, legislative, policy, and institutional expressions and practices.
10. Awareness raising and affirmative action at all levels are needed to address these systemic, marginalizing, practices. People with disabilities in RRM+ areas must be included in human rights protections, not peripheralized and left behind.

2.3. Leadership from the Human Rights Council and all actors

11. These problematic practices can be changed through leadership by:
 - The Human Rights Council to achieve responsiveness of all processes, entities, accountability structures, drafting and outputs across the United Nations. This includes all Treaty Bodies and Special Mandates.
 - Regional institutions, focal points, collaborative and *norm building* processes.
 - States parties in all their relevant human rights efforts, normative expressions and their practices including their legislation, policies and institutional frameworks.
 - National Human Rights Institutions, Civil Society Organisations and all who promote human rights inclusion in all their relevant efforts.

3. Input in relation to the key questions and types of input/comments sought

12. This input relates to all areas covered by the Convention.

Main areas covered by the Convention ¹	(1) Main lessons and challenges	(2) Examples of reflection in legislation, policies or institutional frameworks	(3) Impact of (2) on human rights of persons with disabilities	(4) Concrete examples including good practices
	<u>Input:</u>	<u>Input:</u>	<u>Input:</u>	<u>Input:</u>
• “Accessibility; • Equality and non-discrimination; • Legal capacity; • Independent living and inclusion in the community; • Education; • Health; • Employment; • Access to justice; • Participation in political and public life; and • Other rights and themes covered by the Convention.”	(1) A main lesson learned is that the human rights of women, children and young people, older people, Indigenous and non-Indigenous and all people with disabilities in remote, rural, maritime and other non-urban areas (RRM+ areas) are often made invisible and peripheral. Orientation and practices to ensure visible, intersectional and effective human rights inclusion is highly insufficient across international, regional, national and sub-national spheres.	(2) The location of people with disabilities in RRM+ areas is subject to a norm which sees few reasons to engage with RRM+ location in legislation, policies and institutional frameworks. This is despite strong forces relegating, denying and violating the human rights of people with disabilities in RRM+ areas. There is dramatic under acknowledgment, and under conceptualisation, of power relations which purport to normalise withholding effective responses for the human rights of people with disabilities in RRM+ areas.	(3) Around the world people with disabilities in RRM+ areas, including intersectional groups (women, children, young people, older people, Indigenous peoples and many others) are among the poorest of the poor, the most vulnerable and the most violated. The practices of under acknowledgment and under conceptualisation are blocking human rights, solidarity and accountability.	(4) The examples below point to how practices in human rights leadership and inclusion can vastly improve engagement, conceptualisation and effectiveness to advance the human rights, empowerment, inclusion and wellbeing of people with disability in RRM+ areas. Momentum across all spheres is achievable through leadership to visibly, intersectionally and effectively reflect, express and include the human rights of people with disabilities in RRM+ areas.

¹ The content in this column reflects the call for input.

3.1 Examples of addressing shortfalls through good practices

13. The following are concrete examples of shortfalls being addressed through good practices. Each are examples relating to the above, namely:

- (1) Main lessons and challenges,
- (2) Examples of reflection in legislation, policies or institutional frameworks
- (3) Impact of (2) on human rights of persons with disabilities
- (4) Concrete examples including good practices.

3.1.1 Example 1 – Disability-based violence and RRM+

National Rural Women's Coalition response to Call for Inputs: Draft Guidelines on identifying and addressing disability-based violence

14. This input highlighted that the [Convention on the Rights of Persons with Disabilities \(CRPD\)](#) relates to all people with disabilities (Art 1). That this includes people with disability wherever located including in remote, rural, maritime and other non-urban areas (**RRM+ areas**), is clear from the inclusive approach of the Convention not limited to references to 'rural' in [Articles 9 - Accessibility](#), [25 - Health](#) and [26 - Habilitation and rehabilitation](#)
15. The input outlined that globally, disability is likely to be more prevalent in RRM+ areas, the majority of the world's Indigenous people live in RRM+ areas, and the majority of the world's poor considered via the Multi-Dimensional Poverty Index.
16. The input aimed to address the effects of the geographically absent stance of the Draft Guidelines. The Draft maintained this stance to an extreme extent.
17. The input noted that while the geographically absent stance does not exclude people with disability in RRM+ areas, it does not:
 - engage with lived experiences, circumstances, contexts, dynamics and barriers, or
 - express how power relations relating to RRM+ areas can adversely and multiply affect human rights, wellbeing and inclusion of people with disability in RRM+ areas.
18. The input showed workings using mapping tools. These approaches can be used in all relevant contexts, as good practice tools, to lift attention to inclusion of people with disability in RRM+ areas and identify key issues. For example, by showing how multiple and intersectional dimensions relating to disability-based violence (DBV) in RRM+ areas could be brought into consideration by focusing on:
 - a) How DBV arises in the lives of people with disabilities in RRM+ areas.

- b) How multi-dimensionality and intersectionality relate factually and conceptually to identifying and addressing DBV in RRM+ areas.
 - c) How the rights of people with disabilities in rural areas in Art 9 (accessibility), 25 (health) and 26 (habilitation and rehabilitation) relate.
 - d) How the Committee's General Comments (GCs) can assist, including reviewing how 'rural' is reflected in previous GCs and where and why 'rural' should be *visibly reflected in drafting*.
19. The input showed an approach to 'writing in', which can be used to support good practices.
20. The following were recommended to overcome systemic drafting, expressive and operative norms which de-visualize the rights of people with disabilities in RRM+ areas.
- Develop and apply issues briefs, prompts and tools to address RRM+ inclusion in all drafting and Convention activities.
 - Upgrade research tools for CRPD operations and stakeholders, to include RRM+ research guides and improved RRM+ search functionality across content including [Statements, declarations and observations](#) all [inquiries](#), [activities](#) and databases.
 - Develop and apply guidelines for surveys and consultations for inclusion of issues for people with disabilities in RRM+ areas. The Guidelines should be monitored and publicly available.
 - Upgrade all Guidelines to reflect RRM+ areas as a cross-cutting theme including:
 - The Committee – upgrade [Reporting Guidelines](#) for States parties, Guidelines for follow-up, concluding observations, independent monitoring. [Additional Guidelines and tools for all treaty body reporting](#)
 - The OHCHR
 - do likewise concerning Guidelines for all treaty body reporting, and advance these issues with all Treaty bodies, mandate holders and operations
 - include the human rights of people with disabilities in RRM+ areas, and the human rights of all people in RRM+ areas, in all relevant actions and strategies, including post 2030.
 - Recommendation for RRM+ General Comment - the Committee consider scheduling a work program to develop a General Comment on people with disability in RRM+ areas regarding non-discrimination and multi-dimensional and intersectional inclusion.

3.1.2 Example 2 – Disability, gender, intersectionality and RRM+

National Rural Women's Coalition response to Call for Inputs: Draft Guidelines on identifying and addressing intersectional discrimination against women and girls with disabilities

21. This input outlined that using the formulation 'rural, remote, maritime and other non-urban areas' (which is like language in para 8 of the [CSW70 agreed conclusions](#) namely

‘women and girls in rural, remote and maritime areas’) – aims to avoid essentialising non-urban areas as functionally ‘rural’.

22. The input showed that good practice requires safeguarding *against peripheralizing areas of input* – in this case peripheralizing the extent to which written inputs raised issues relating to women with disabilities in RRM+ areas - which were highly absent from the Draft.
23. The workings of tools to consider how the Draft responded to women with disabilities in RRM+ areas were shown. These tools are good practice for identifying how the approach to drafting, including the selection and treatment of content, positioning and structuring can enhance or reduce the inclusion of women with disabilities in RRM+ areas. The tools can also be used to enhance the human rights of all people in RRM+ areas.
24. Another tool in the input demonstrated ‘writing in’ – the combination of tools being a good practice to show and substantiating why the Draft should be upgraded to address:
 - intersectional discrimination against women with disabilities in RRM+ areas as a cross-cutting theme
 - substantive approaches and substantive equality, and
 - indirect and direct discrimination
25. Intersectional discrimination against women with disabilities in RRM+ areas was conceptualized using examples of facing a ‘triple structural barrier’ and ‘breaking triple layers of discrimination’ and the case of [Susana v Nicaragua \(2024\)](#) where the Human Rights Committee found 9 articles of the ICCPR were violated and that:

“the facts of the present communication also disclose a form of intersectional discrimination based on the author’s gender, her age and the fact that she lived in poverty in a rural [area].”
26. This example also adds to dimensions of Example 1, including the need for momentum on many fronts, Guidelines and leadership to overcome normalised invisibilization and peripheralization of people with disabilities in RRM+ areas.

3.1.3 Example 3 – Disability, gender stereotypes and RRM+

National Rural Women’s Coalition response to Draft general recommendation No. 41 on dismantling gender stereotypes and the unequal power relations that sustain them

27. This input identified that the draft General Recommendation (‘GR’) 41 applied a universalist approach, treating all women and girls as included, while making no reference to women and girls in RRM+ areas. Although this did not exclude women and girls in RRM+ areas it did not make these women and girls visible or reflect:
 - a) How gender stereotypes apply in RRM+ areas.
 - b) How intersectionality relates factually and conceptually to RRM+ areas.

- c) How CEDAW Art 14(1) (that States parties' 'take all appropriate measures to ensure the application of the provisions of the present Convention to women and girls in rural areas') relates.
 - d) How [GR34 \(2016\) rights of rural women](#), ('GR34') [General Statement of the CEDAW Committee on Rural Women](#) (2011) and other CEDAW Committee GRs - which also include rural women and stereotyping - relate.
28. The input recommended that the drafting engage with (a) to (d) for effective rights description, treatment and inclusion of women and girls in RRM+ areas to ensure that action on requirements '*to dismantle gender stereotypes and the unequal power relations which sustain them*' benefit all women and girls wherever located including in urban and non-urban areas.
29. This approach reflected that the lives and contexts of women and girls in RRM+ areas are often impacted by multi-dimensional peripheralizations, inequalities and subordinations. This includes experiencing duty-bearer failures which directly or indirectly evoke their RRM+ location against them. Geofencing the human rights of women and girls is impermissible and adverse discrimination based on RRM+ location must be fully addressed.
30. The input outlined that universalist drafting approaches, which do not engage as outlined, risk perpetuating norms operating against women and girls in RRM+ locations including:²
- Urban normativity: urban as power and knowledge centre applying centre / periphery geographic and political dynamic.
 - Structural urbanism: urban structured into many forms of power and power relations.
 - Social Darwinism: especially geographic determinism, which claims geography is destiny and that geographic location not duty-bearer shortfalls, account for profiles of poverty related human rights shortfalls in RRM+ locations.
31. Overcoming barriers to addressing people in RRM+ areas in practices – including practices in preparing draft General recommendations – requires critical consideration of what is causing current, deficient, practices. That good practice involves conceptualising how power operates spatially – often controlling and withholding resources and requirements for human rights inclusion of certain groups, or all groups, in certain areas. Some resources which can assist include:
- The diagram in the [Wiyi Yani U Thangani \(Women's Voices\): Securing Our Rights, Securing Our Future Final Report](#) (2020, p. 72) which notes that 'geographic based discrimination (urban v remote)' is *a type of discrimination*.
 - Considering whether it is sufficient to treat 'rural' mainly as an identity and how this operates in trying to increase human rights inclusion. Some references were

² Li, Tania Murray, 'After Development: Surplus Population and the Politics of Entitlement' (2017) 48(6) *Development and Change* 1247–1261, Hayes, Karen et al, 'Rural and remote health care: the case for spatial justice' (2025) 25(1) *Rural and Remote Health* 1; Probst, Janice et al, 'Structural Urbanism Contributes to Poorer Health Outcomes for Rural America' (2019) 38(12) *Health Affairs* 1976

included for more background in considering ‘intersectionality’ and ‘rurality’ / intersectionality and RRM+ locations.

32. The input noted that although the [Concept Note towards draft GR41](#) noted why rural women must be included, this is not reflected in the current draft. That the [Zero draft of CSW70 agreed outcomes](#) and [most of written the CSO inputs in the lead up to CSW70](#) contained no reference to women and girls in RRM+ areas warrants broad consideration. Regarding draft GR41, questions include: why RRM+ areas were (i) not described, (ii) not considered in any of the treatments of intersectionality, and (iii) not considered conceptually in terms of power relations?
33. Leadership is needed to improve human rights, wellbeing and inclusion. This includes modeling procedural, conceptual and textual inclusion to stand in full solidarity with women and girls in RRM+ areas against multiple structures, narratives and norms of human rights withholding. Leadership can encourage all stakeholders to fully partner, collaborate and meet solidarity expectations.
34. Consequently, it is recommended that the CEDAW Committee develop:
- A high-level directive to inform its work and UN Women operations to guard against non-inclusion, nominal or superficial inclusion of gender issues and issues for women and girls in RRM+ areas.
 - A Guidance and resources for actors and functions across the UN system, for States parties and duty bearers to promote good practice for:
 - full, effective, intersectional inclusion of women and girls in RRM+ areas, and
 - non-discrimination against women and girls based on their RRM+ location.
35. This example adds to dimensions of Example 1 and Example 2 – which in combination demonstrate the patterns of normalizing no or little visible, conceptualized, intersectional and effective engagement with the human rights of people and peoples in RRM+ areas.

3.1.4 Example 4 – legislation, policy, frameworks: people with disability in RRM+ areas

36. Many inputs to the Call for written submissions on the draft guidelines on addressing multiple and intersectional forms of discrimination against women and girls with disabilities which concluded in Nov 2025, **raised concerns** about the treatment of people with disability in RRM+ areas within nation States. The inputs are [here](#).
37. The Australian Disability Discrimination Act is federal legislation. This Act does not address how geographic location, urban or regional, rural, remote or very remote location can be relevant in discrimination relating to disability. For background see [the submission](#) by the National Regional, Rural, Remote and Very Remote Community Legal Network to the federal review of the Disability Discrimination Act which includes the chart on the next page.

National Regional, Rural, Remote and Very Remote (4Rs) Community Legal Network [submission in November 2025](#) to the federal Attorney-General's Department [Issues Paper for Review of the Disability Discrimination Act](#), included this table showing non-treatment of 4Rs areas.

	Search terms and table of pertinent occurrences								
DDA Reform – Issues Paper	Urban	City ⁴⁰	Metro	Regional ⁴¹	Rural	Remote	Geo ⁴²	Place ⁴³	Local ⁴⁴
Introduction & Glossary	0	0	0	0	0	0	0	0	0
Part 1 – Updating understandings of disability and disability discrimination	0	0	0	0	0	0	0	0	0
Part 2 – Positive duty to eliminate discrimination	0	0	0	0	0	0	0	0	0
Part 3 - Encouraging inclusion of people with disability in employment, education and other areas of public life	0	0	0	0	0	0	0	0	0
Part 4 – Improving Access to Justice	0	0	0	0	0	0	0	0	0 ⁴⁵
Part 5 - Exemptions	0	0	0	0	0	0	0	0	0
Part 6 – Modernising the DDA	0	0	0	0	0	0	0	0	1 ⁴⁶
Part 7 – Further options for reform	0	0	0	0	0	0	0	0	0
Total pertinent references	0	0 ⁴⁷	0	0 ⁴⁸	0	0	0	0 ⁴⁹	1

⁴⁰ 'City' in the name of a case cited in footnote

⁴¹ Searched on 'region' and 'regional'

⁴² 'Geo' to identify uses of 'geography', 'geographic', 'geo-social', 'geographic disadvantage', 'geographic inclusion' etc.

⁴³ 'Place' to identify references to location

⁴⁴ 'Loca' to identify reference to 'local', 'location', 'locality' etc.

⁴⁵ Searching on 'loca' for variations, returned 3 instances one was not pertinent, the word 'local' appeared once in quoting the current definition of services in the DDA but this was not specific to 4Rs areas i.e. (with the occurrence of 'local' bolded): "services includes: a. services relating to banking, insurance, superannuation and the provision of grants, loans, credit or finance; or b. services relating to entertainment, recreation or refreshment; or c. services relating to transport or travel; or d. services relating to telecommunications; or e. services of the kind provided by the members of any profession or trade; or f. services of the kind provided by a government, a government authority or a **local** government body. "

⁴⁶ The third return from searching 'loca' was one occurrence of 'location' although this was not 4Rs specific it was about locational inclusion, that reference (with 'location' bolded) was: 'The Disability Discrimination Act could be amended to provide greater clarity on training requirements. Any changes would need to ensure people who cannot access formal training and/or accreditation for their assistance animals due to their **location** or other circumstances are not unreasonably excluded from protection.'

⁴⁷ There were 8 references to 'city' i.e. 4 in the term 'capacity' and 4 in the name of cases cited in footnotes e.g. footnote 214 *IW v City of Perth* (1997) 191 CLR 1, 12'

⁴⁸ The word 'region' did not appear, the word 'regional' appeared twice, both in the name of the Department i.e. '. The Transport Standards are co-administered by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts and the Attorney-General's Department'.

⁴⁹ There were 34 returns on the word 'place' however this appeared in terms such as 'This exemption is in place to ...', 'public place/s', 'workplace', 'in place', 'replace' etc.

4. Conclusion

38. There are systemic barriers to the human rights of women, girls, young and older people, Indigenous and non-Indigenous people and all people with disabilities in RRM+ areas, which are not being addressed by:
- normative instruments and expressions
 - legislation
 - policies
 - institutional frameworks, and
 - leadership.
39. This applies to normative expressions by United Nations bodies and to legislation, policies and institutional frameworks at the international, regional, national and sub-national levels.
40. This input highlights that there are many practical and straightforward steps that can be taken to address these practices. Many of the steps are about consciousness raising, leadership and momentum.
41. Substantial progress can be made through leadership at the highest levels and at all levels, using readily available methods, which are identified in this input, particularly at 2.3 above – Leadership from the Human Rights Council.
42. The practical tools outlined in this input are good practices for much needed progress in solidarity with the full diversity of people with disability in RRM+ areas whose human rights must be respected, protected and fulfilled.
43. The key approach highlighted in this input is ‘writing in’ the human rights of people with disability in RRM+ areas – in all instruments, expressions, legislation, policies, and institutional frameworks which are lacking.