



**Toolbox**

# Handistreaming



**For equality,  
against discrimination**

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To facilitate reading for blind readers using text-to-speech devices, and in the interests of text legibility, masculine forms have been used to designate both sexes, men and women, as well as the various forms of gender identity or expression.

# Handistreaming toolbox

## Summary

The **handistreaming toolbox** is a tool for federal officials, policymakers and government cabinets who are shaping new policy initiatives or projects with a specific focus on the rights of persons with disabilities. The content can also be applied to other policy levels.

The toolbox aims to:

- **Inform** administrations and policymakers so that they can take the fact of **disability** and the **legal context** surrounding it into account in any new policy initiative.
- Provide **practical support** for policy initiatives in order to adapt to the legal and real **needs of persons with disabilities** as early as possible.

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# General context and definition

## What is handistreaming?

Handistreaming means that all policies take the disability dimension into account. In this way, persons responsible for elaborating, implementing, and assessing that policy shall ensure the protection and promotion of the human rights of persons with disabilities.

Each new policy measure will reflect on **the impact on people with disabilities in all aspects of life**. This runs parallel with the Universal Design<sup>1</sup> principle in the environment. The more handistreaming and universal design are generalised, the less need there will be for remedial measures (in the form of reasonable accommodations), and the more inclusive our society will be.

## Why handistreaming?

### Structural inequalities

People with disabilities still experience many structural inequalities in our society. For example, there is less access to work, and it is more difficult to move, or find adapted housing, and the risk of poverty is much higher. There are many policy initiatives that pay little attention to the accessibility dimension, whether it be financial, architectural, informational or healthcare matters. To consider this target group, it is necessary to introduce **specific rules or guidelines** to avoid certain inequalities.

Previously, these decisions were taken within a disability-specific competence. Now more transversal and intersectional thinking is steadily taking place. Indeed, paying attention to the issue of disability in all policy areas helps eliminate existing inequalities and avoid new inequalities created by inappropriate legislation/policies.

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1 “Universal design” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. “Universal design” shall not exclude assistive devices for particular groups of persons with disabilities where this is needed. (art.2 UN Convention on the Rights of Persons with Disabilities).

## Obligation for policymakers and public officials

In 2009, Belgium ratified [the UN Convention on the Rights of Persons with Disabilities](#) (now called the UN Convention). The UN Convention states that all persons with disabilities must be able to **benefit from all human rights**, such as the right to equality and **non-discrimination**, the right to accessibility, the right to equality before the law, the right to freedom and security of the person, the right to independent living and to be part of society, the right to education, the right to work, and so forth.

In addition, [Article 22ter of the Belgian Constitution](#) has guaranteed the right to social inclusion and reasonable accommodation as of 2021.

Belgium is, therefore, obliged to guarantee and promote the full exercise of all human rights and fundamental freedoms by all persons with disabilities by:

- Adopting all relevant legislative, administrative and other measures for the implementation of the rights recognised by this convention,
- Taking all relevant measures, including legislation, to adapt or eliminate existing laws, regulations, practices and practices which discriminate against persons with disabilities,
- Ensuring that all policies and programmes consider protecting and promoting the human rights of persons with disabilities. (Article 4, UN Convention).

Therefore, it is important that officials, policymakers, and cabinets are up to date on how to apply handistreaming.

The [implementation and monitoring of the UN Convention](#) at national level (art. 33, UN Convention) has three major components : contact points and a coordination mechanism at government level, an independent mechanism and civil society.

In Belgium, this translates as follows:

1. The federal government has a UNCRPD contact point in the Social Security FPS, which is also the coordinating mechanism with the contact points in the federated entities. The federal contact point provides the secretariat for a Federal Disability Network made up of members of federal government cabinets, administrations and public companies.
2. **Unia** has been an independent body [since 2011](#) for the **implementation, protection and follow-up of the application of the UN Convention** on the Rights of Persons with Disabilities. Since March 2023, the ‘**Vlaams Mensenrechteninstituut**’ (VMRI) has been responsible for Flemish powers.
3. At a federal level, the [Conseil Supérieur National des Personnes handicapées](#) (National Higher Council for Persons with Disabilities) is the advisory body and is made up of organizations representing disabled people.

[Do you want to know more about the assessment of the UN Convention?](#)

## The benefits for society and citizens

By no longer considering the population as a homogeneous group to which the policy applies uniformly and by taking better account of the needs and expectations of all citizens, handstreaming contributes to:

- A more effective and efficient policy.
- Preventative and transversal work (simultaneously on multiple domains ).
- Reduced additional costs related to reasonable accommodations or corrective measures.
- An inclusive society.
- Greater representation of the population in terms of learning, living, working, etc.
- Attention to the most vulnerable in society.



**[For example]** During the Covid pandemic, everyone was required to wear a mask. Initially, the impact on people with disabilities was not considered. Following an intervention by Unia, a ministerial decision was adopted to make an exception in certain cases for persons with disabilities, including deaf persons and their interlocutors. This allowed deaf people to continue to participate fully in society.

## What is a ‘disability’?

For a long time, a disability was almost exclusively considered an individual and medical problem. This approach has rightly been questioned in recent decades. Today, the focus is no longer only on the individual but also on what does not

work in society. That is, the disability arises from the confrontation between an individual with one or more limitations and an **environment that does not adapt** to the individual’s specific characteristics. The anti-discrimination legislation, the Belgian Constitution and the United Nations Convention on the Rights of Persons with Disabilities fully endorse this new approach.

For example, the UN Convention defines People with Disabilities as follows: ‘persons with **long-term physical, mental<sup>2</sup>, intellectual or sensory disabilities** that may, in **interaction with various thresholds**, prevent them from participating fully, effectively and equally with others in society’.

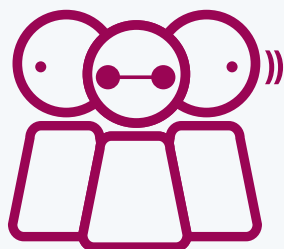
## Different types of disability

The definition of the UN Convention is a broad definition that focuses on the limitations a person encounters **concerning the environment** and its **long-term nature**. The broader approach to disability, therefore, includes chronic or degenerative diseases, mental disorders, neuroatypical disorders, such as autism, dyslexia, dyscalculia and also, in certain situations, obesity.

This chapter discusses some of the larger groups of disabilities in order to clarify which obstacles individuals may experience in everyday reality. The group of people with disabilities is **very diverse**, and there are very different needs within the groups. 80% of people with disabilities also have an invisible disability<sup>3</sup>. Only 20% have a congenital disability. A combination of different handicaps is common. For example, a person with (multiple) disabilities may experience both intellectual and motor disabilities. This makes the process of handistreaming complex and questioning the target audience in policy initiatives extremely necessary. Furthermore, thinking in stereotypes must be avoided (see practical elaboration in handistreaming ⇒).

80%

of people with disabilities have an invisible disability



## Deaf and hard of hearing persons

Persons with hearing disabilities may be deaf or hard of hearing. The degree of hearing loss can vary greatly and depends on the frequencies at which hearing is affected. It is a disability that is **not always visible immediately** and which, above all, creates limitations in terms of communication. Most hard of hearing people have hearing aids or cochlear implants. This lets them pick up more sounds or connect to a loop system at busier meetings or events. However, this does not mean hearing aids enable a deaf or a hard of hearing person to understand everything.

Some deaf people use **sign language**. In Dutch-speaking Belgium, we call it 'Vlaamse Gebarentaal' (VGT) and in French-speaking Belgium, 'Langue des Signes de Belgique Francophone' (LSBF). Deaf people and people who are hard of hearing can often lip-read if one speaks clearly and concisely. For the majority, especially for those who are deaf from birth, the written language is a foreign language. That is because writing is a phonetic reflection of what is being said. That is why written communication not always ideal for deaf people either. The deaf community attaches great importance to the linguistic and cultural identity.

## People with a visual impairment

People with visual impairments can be blind or visually impaired. Impaired vision can manifest itself in different ways. Some people see more blurry, and others miss part of their field of vision, colour perception or see spots. Some visually impaired people need plenty of light. Others need a darker environment and might wear tinted

3 <https://ph.belgium.be/resource/static/files/News/campagne-asph-rendons-visibles-les-invisibles-dossier-de-presse-.pdf> ; <https://enmarche.be/societe/inclusion/regards-sur-le-handicap-invisible.htm> ; <https://www.ixelles.be/site/906-80pc-des-handicaps-sont-invisibles-pensons-y->

glasses. It is a disability that is not always visible immediately and which, above all, creates limitations in terms of **orientation and movements**. One may experience limitations in the daily activities. Blind and partially sighted people often use a white stick or a guide dog to move around. They also use tactile elements in the environment for orientation. Blind people are taught routes (for example, from home to work). .

## Persons with a physical impairment

People with a motor disability have **problems with movement**. For example, they cannot walk or use their arms properly. This might be due to problems with muscles, joints or skeleton. Think of people with involuntary movements (spasms or tremors), coordination problems, muscle diseases, paralysis, arthritis and people with missing limbs. Some motor handicaps are obvious, for example, because someone is in a wheelchair. Other handicaps, such as rheumatism, are less noticeable or can't be seen at all.

Persons with motor disabilities have **problems with movement** to varying degrees. They might concern short movements (such as moving from a bed to a wheelchair at home) or larger movements such as getting from home to work). They also experience varying degrees of limitations in their daily life activities.

## Persons with autism

Autism is a neurological developmental disorder and can manifest itself in various ways. No characteristic is typical and unique to autism. That is why we speak of an **autism spectrum disorder (ASD)**.

Autism is a collective name for behavioural characteristics that reflect vulnerability in the following areas: social interaction, communication, flexibility in thinking and acting, and filtering and integrating information.

People with autism often struggle with **social interaction** because they do not always understand the changing social rules in different contexts.

People with autism are particularly sensitive to **new or unexpected situations or changes** or to stimuli from the environment.

Most people with autism have normal to high intelligence. It is estimated that 30% of people with autism also have an intellectual handicap<sup>4</sup>.

## Persons with an intellectual impairment

This is also a diverse group with various medical causes. An intellectual disability exists when the behaviour and skills of a person with an intellectual disability differ from those of peers. This becomes apparent for example, when playing together or when falling behind in class. A person with an intellectual disability is less able to cope with **everyday life** and has less intellectual potential than most other people.

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4 <https://www.inclusion-asbl.be/le-handicap-intellectuel/differents-exemples-de-handicaps/trouble-du-spectre-autistique/>





## Persons with a mental impairment

People with mental disabilities have mental and/or emotional disabilities that influence **thinking, feeling and acting** to an extent that they cannot function optimally in daily life. It is a disability that is not immediately apparent. People with mental disabilities have more difficulty functioning in key areas of life such as learning, living, working and social contacts. A person may experience a mental disability for several years or throughout life. The impairment, intensity and duration of the symptoms vary from person to person.

## People with a chronic disease

Someone with a **chronic** condition suffers the same condition for a long period of time. This disease can be physical or psychological. The

An intellectual disability is characterised by the following:

1. A clear limitation in intellectual functioning.
2. A clear limitation in skills that people need to survive in everyday life, such as communication, self-care and self-determination, social skills, etc.
3. The limitations must occur before the age of 18.

People with intellectual disabilities benefit from communication in **simple language** or through simple pictograms. An example is the SMOG language which combines speech with supporting gestures.

disease lasts for at least three months or leads to more than three periods of illness a year.

The main characteristics of a chronic condition are that:

- The disease cannot be cured.
- Only the symptoms can be treated.
- The disease is progressive, so it gets worse over time.
- The disease has an effect on physical or mental functioning.
- The course of the disease is erratic and unpredictable.

This is the case for, among others, people with cardiovascular disease, diabetes, cancer, lung disease, and some autoimmune diseases, but also for people with neurodegenerative diseases such as dementia or Parkinson’s disease, people with disabilities who need recurrent care and people with various mental disorders. Sometimes a person will need help and care from others or has difficulties moving.

## General principles of Disability-inclusive language<sup>5</sup>

People-first language is the most widely accepted language for referring to persons with disabilities. It is also the language used in the Convention on the Rights of Persons with Disabilities. People-first language emphasizes the person, not the disability, by placing a reference to the person or group before the reference to the disability. By contrast it is particularly important to stop using stigmatising words such as handicapped, dis-, less- or differently-abled people, or invalids.

However, the people-first rule does not necessarily apply to all types of disabilities. There are some exceptions. For example, when referring to persons who are blind, we can say either “blind persons” or “persons who are blind”, and the same applies to deaf or deafblind persons.

Moreover disability is a part of life and of human diversity, not something to be dramatized or sensationalized. Persons with disabilities should therefore not be portrayed as inspirational or “super-human”. This language implies that it is unusual for persons with disabilities to be successful and productive and to live happy and fulfilling lives.

Some expressions have gained popularity over time as alternatives to inappropriate terms. However, many of them reflect the misguided idea that disability needs to be softened. We should therefore not use terms such as “differently abled”, “people of all abilities”, “disAbility” or “people of determination”, as they are all euphemistic and can be considered patronizing or offensive.

## Disability or impairment? Which word is preferred?

Impairment refers to “any loss or abnormality of psychological, physiological or anatomical structure or function” (World Health Organization), while disability “results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others” (Convention on the Rights of Persons with Disabilities, preamble, para. (e)). Since these terms have different meanings, they are not interchangeable.

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5 [Disability-Inclusive-Language-Guidelines.pdf \(ungeneva.org\)](https://www.un.org/disability-inclusive-language-guidelines/)

## 2

# How to handistream

## Handistreaming in 10 steps

### Step 1: Avoid stereotypical thinking

Not every person with autism behaves like Rain Man. Not every person with reduced mobility stays at home all day. **People with disabilities can also work, have children or do voluntary work.** There are also children and older people with disabilities. Some people with disabilities live in a group accommodation and have difficulty accessing information. Be sure to include these insights in the elaboration and communication of (policy) initiatives or events.

### Step 2: Use (or collect) data to understand the situation of people with disabilities

There are various disabilities and various thresholds in the environment (see the [previous section](#) ↗). It's up to the environment to remove as many thresholds as possible.

When developing a policy initiative, it is important to have an **accurate picture** of the thresholds and the problems faced by people with disabilities. Furthermore, in order to assess the policy, its

real impact must be measured, so try to consult as much data or as many statistics as possible that (also) contain information about people with disabilities.

There is a lot of available data regarding people with disabilities, but they are not always easy to find. Don't hesitate to contact the experts or organisations if you have trouble finding data. Soon, you will also be able to use [Unia's online data hub](#).<sup>6</sup>

Do you have little or insufficient data? Then, collect data yourself, for example, through a survey. The following considerations should be taken into account:

- Ensure that a sufficient number of people with disabilities are questioned.
- Involve the National Higher Council of Persons with Disabilities and the associations of persons with disabilities in order to reach people with a disability (see step 6).
- Ask questions about having a disability/impairments or not so that the data allow for the identification of inequalities and specific problems;
- Think carefully about which questions are best suited to identify the target audience and preferably use existing ones:
  - Do you have questions about disability in general? The [GALI survey](#) matches the broad definition in the UN Convention: "For

<sup>6</sup> The disability search function will be added in spring 2024.

at least the past 6 months, to what extent have you been limited because of a health problem in activities people usually do?” with answer categories “severely limited / limited but not severely or / not limited at all?”.

- Questions on specific impairments in daily life? See the question sets from the [Washington Group on Disability Statistics](#).

Do you want to know more about the world of people with disabilities and the thresholds that they experience? Then, read the [questions of persons with disabilities on the compliance of their rights by Unia](#).

### Step 3: Perform a handi-check with each (new) policy initiative

An important step is to anticipate a handi-check in each (new) policy initiative. Taking the disabili-





lity dimension into account from the outset will reduce the need for corrective measures and will immediately consider the rights and needs of a large vulnerable group. If certain target groups were to be excluded from a given policy initiative, this can only be done with a well-founded and responsible argument.

Existing policy initiatives require proper monitoring of the **impact on people with disabilities**. A simple reporting procedure for questions or problems can also help.

Unia worked out a substantive handi-check: [link to part 2.2](#) ➔

## Step 4: Review the legal context for anti-discrimination against people with disabilities

The UN Convention stresses that a person with disabilities has the **same rights** as everyone else. Furthermore, there are anti-discrimination laws and decrees which protect people with disabilities against discrimination and impose the obligation to make reasonable accommodations.

Learn more about the legal context: [link to section 3](#) ➔

## Step 5: Provide a point of contact in each department

Contact points with knowledge of disabilities and accessibility are needed to monitor the handistreaming actions and can support the handi-check. Make sure that this is also part of their remit to ensure sufficient time and reporting opportunities. The contact points can be assisted by user-experts or accessibility experts. The more finely meshed

the **network of contact points**, the more initiatives can be followed up.

The federal government already has a Disability Federal Network with players from the cabinets of the federal government, administrations, state-owned companies and parastatal organisms. The UNCRPD coordination mechanism organises its secretariat and can be reached at [coordinati-onmechanismuncrpd@minsoc.fed.be](mailto:coordinati-onmechanismuncrpd@minsoc.fed.be).

## Step 6: Consult with user-experts, user associations and the official government advisory board

The advisory board of the federal government is the [Conseil Supérieur National des Personnes handicapées](#) (CSNPH) (National Council of Persons with a Disability) and has detailed and experience-based knowledge.

Nothing prevents you from setting up a representative advisory group in addition and thus applying the principle of Nothing About Us Without Us. The UN Convention (Article 4.3) additionally mandates the **consultation of persons with disabilities**.

In developing and implementing legislation and policies implementing this Convention and other decision-making processes concerning matters relating to persons with disabilities, States Parties shall consult closely with persons with disabilities, including children with disabilities, and actively involve them through their representative organisations. (UN Convention article 4.3)

### Points of attention:

- Create a **diverse and representative** consultative group. This may include user-experts, accessibility experts and user associations. The advisory group should consider the collective needs of the various disability groups.
- Treat **user-experts** as experts. Give their advice the appropriate weight by including it in your projects' development. Also, provide the necessary (financial) support to deploy these experts correctly and effectively.

[An overview of the umbrella organisations providing advice to public administrations is in Chapter 4 ➔](#)

## Step 7: Create a clear roadmap with timing and measurable actions

Create an overview of the (partial) actions to be taken, your measurement/assessment methods, and the desired timeframe to achieve them. Communicate the actions to all players involved and designate a responsible person among the players.

### Point of attention:

- Follow the actions during **each step of the process** of your policy initiative / tender / event to avoid unpleasant surprises in the elaboration.

**[For example]** A building may be fully accessible on paper according to the accessibility legislation, but if things are implemented differently from the plan or the furniture is installed in the wrong place, major obstacles can still arise.

## Step 8: Strive for user-friendliness for all (Universal Design)

**Universal design** makes the environment accessible to all people, allowing each person to make the most of their abilities. This implies that when drawing the design of a building for example, care is taken that the building is perfectly accessible. This avoids the need for costly adjustments later on for people with reduced mobility, visual or hearing disabilities, etc.

The universal design concept does not only apply to the physical accessibility of the environment. It may also concern work or communications material, signalisation, or the way things are organised.

Where universal and/or collective solutions are no longer possible, tailor-made solutions should be sought at a more individual level. We call that **reasonable accommodations**.

Attention: Reasonable accommodations are a legal requirement, not a favour.

[What are reasonable accommodations? | Unia](#)

### Points of attention:

Not all solutions are possible for every user. When this is the case, try to create **tailored solutions** for various users or think of a compromise.

**[Example 1]** A visually impaired person often needs clear tactical guidance to find their way around the public domain. A wheelchair user,

on the other hand, would like to have a flat surface. In this case, a tactile guide of at the most 1 cm can be recommended as a compromise, which will not hinder the wheelchair user.

**[Example 2]** Subtitling videos in crisis communication (for example with regard to COVID-19) caters for deaf people who are strong in written language and others who have difficulty with spoken language. However, sign language must also be provided for deaf people who have difficulties reading.

**[Example 3]** Assigning ‘street’ numbers to hospital corridors is very convenient for many visitors and patients. However, for people with intellectual disabilities, the numbering of hospital corridors can cause problems. This group is better served by a colour system, which is problematic for people with colour blindness.

Therefore, a combination of different signalling methods needs to be sought.

- Solutions aren’t black or white. Inclusive action and thinking often provide appropriate grey solutions **depending on the context**.

**[For example]** In a new building environment, you’re obliged to strive for maximum universal accessibility, in contrast to a heritage-protected environment, where tailor-made solutions need to be sought to preserve the heritage value while ensuring access.

- Be careful with **digital applications** or other digital tools. Not all digital applications are suitable for persons with (visual) disabilities. Let yourself be guided by experts in digital accessibility. Furthermore, people with disabilities often do not have access to the Internet.



Therefore, take the specific digital accessibility standards into account when developing a digital application and always provide a **non-digital alternative**.

**6%** of the population aged between 16 and 64 does not have internet access at home, but this percentage is three times higher for people who experience severe discomfort (disability) in their daily activities.



## Step 9: Communicate on the implemented actions

### Points of attention:

- Communicate to the user organisations of and for persons with disabilities.
- Also communicate about the actions taken in the regular communication channels.
- Communicate in an **inclusive** way. You can find tips for inclusive communication here: [Inclusieve communicatie: gids en tips | Unia](#).
- Communicate **directly** to the target audience, not a potential facilitator unless projects involve persons with disabilities and their caregivers.
- Use **images** of people with disabilities in all regular communication channels. Keep in mind that the group of people with disabilities is very diverse and that there should be a variety of diversity (different disabilities, older people and children, disabled people with different origins, men and women, etc.).

## Step 10: Assess with the internal handstreaming point of contact and user-experts

Review the roadmap (Step 7) with the internal handstreaming contact point and the previously consulted experts. Also, assess the measures you take within your service at an organisational level.

**Include the good experiences and practices into future actions and avoid repeating bad practices.**

For example, good practices can be documented and shared internally and externally.



## Handi-Check: Points to consider

### Acces

- Is the policy initiative **equally accessible and usable** for all? Identify potential differences.
- Is attention paid to the **administrative barriers** for users and to the **digital divide**?
- Is the policy initiative tailored to different handicaps? Which **reasonable accommodations** are needed to allow everyone to participate?

### Legislation

- Does the policy initiative comply with the non-discrimination **requirements**, reasonable accommodations and accessibility in European, national and regional legislation?
- Does the policy initiative respect exercising the **fundamental rights** of persons with disabilities?
- Are **previously acquired rights** guaranteed for people with disabilities?

### Impact

- Does the policy initiative (**directly or indirectly**) **impact people with disabilities in a positive or negative way**? Is there a different impact on different groups of people with disabilities? Identify the impact.
- Does the policy initiative have a positive or negative **impact on the loved ones of people with disabilities**? Identify the impact.

Parents of children with disabilities may be discriminated against because of their connection with their child. This is called **discrimination by association**. The renewed Federal Anti-Discrimination Act of 22 June 2023 now recognises this form of discrimination and ensures more protection: [La loi évolue, les victimes de discrimination sont mieux protégées | Unia](#)

- What measures are being taken to mitigate or compensate for **possible negative effects**?
- Does the policy initiative provide a **structural solution** for all different types of disability? Which **reasonable accommodations** should be provided for other types of disability?



## Intersectionality

- Does the policy initiative guarantee equality for **men and women** with disabilities?
- Does the policy initiative guarantee equality for **children and older people** with disabilities?
- Is the initiative also suitable for **LGBTI+** people with disabilities and people with a **migrant background** with disabilities?

### What is intersectionality?

The vulnerability and exclusion of people with disabilities can be exacerbated when other discrimination criteria are added to the disability. When these differences in [discrimination criteria](#) interact and become inseparable through interaction with a particular context, we speak of intersectional discrimination. For example, women with disabilities are more likely to be victims of violence (compared to men with disabilities) and sexual abuse (compared to women without disabilities).

Concerning the concept of multiple discrimination, including intersectional discrimination see: [Discrimination multiple et intersectionnalité | Unia](#)

Concerning women with disabilities, see: [Femme et handicap. Davantage de risques d'être victime de discrimination et de violences | Unia](#)

**[For example]** We see that employment support measures benefit men with disabilities more than women. This is a risk that must be avoided.

## Knowledge sharing

- Are there specific internal **training courses** or is there **awareness-raising** with regard to people with disabilities? If so, for whom and what are they about? If not, why not?
- What existing initiatives can serve as **inspiration**?
- Is the **communication** within the policy initiative inclusive and accessible to all?

## Assessment

- What **indicators** to measure the results and impact of policies on people with disabilities?
- Will there be a **satisfaction survey** or a **notification form**?
- How will the **feedback** be used to change the policy?

**It is important to carry out this handi-check in collaboration with user-experts and experts.**

## 3

# Overview of the legal framework

## Introduction

The legal framework surrounding the fundamental rights of people with disabilities living in Belgium is very broad. It includes **international, European and Belgian standards** (from the federal state and the different federated entities).

These different standards are organised according to a hierarchy. Each standard must comply with all the standards above it in the hierarchy.

Therefore, authorities adopting or amending a standard must consider the higher standards.



Therefore the law does not solely consist of legal texts. It is also based on other sources, such as numerous Belgian and international court decisions and legal works written by legal experts.

Link to case law on disability discrimination: [Jurisprudence | Unia](#)

Link to case law on the application of the CRPD (“Annotated Convention”): [Convention relative aux droits des personnes handicapées : jurisprudence | Unia](#)

## The legal framework applied in Belgium concerning the fundamental rights of people with disabilities

### United Nations Convention on the Rights of Persons with Disabilities (CRPD)

Inclusion, non-discrimination, reasonable accommodations

+ other international and European human rights treaties not specific to people with disabilities (European Convention on Human Rights, European Social Charter, International Convention on the Rights of the Child, Charter of Fundamental Rights of the European Union, etc.)

### The European Directive establishes a general framework for equal treatment in employment and work

Non-discrimination and reasonable accommodations in employment

→ Incorporated as part of internal anti-discrimination legislation

### Constitution

Inclusion, Non-discrimination, Reasonable accommodations

Articles 10 (equality), 11 (non-discrimination) and 22 ter (rights of people with disabilities to inclusion and reasonable accommodation)

### Anti-discrimination legislation ←

Non-discrimination and reasonable accommodations

Federal law of 10 May 2007 and all the anti-discrimination decrees and orders specific to each federated entity

### Protocol on the concept of reasonable accommodation

Reasonable accommodation

### Standards specific to certain rights of people with disabilities

For example:

- decrees and orders relating to access for assistance dogs
- Royal Decree of 11 September 2022 amending the Code of Well-being at Work concerning the reintegration process for workers who are unable to work,
- Law of 17 March 2013 reforming incapacity schemes and introducing a new protection status in keeping with human dignity, etc.

# Overview

## International conventions

### The United Nations Convention on the Rights of Persons with Disabilities (CRPD) and its Optional Protocol.

The CRPD is the first binding international human rights instrument to deal specifically with disability. Its aim is “to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to foster respect for their inherent dignity”.<sup>7</sup>

The CRPD and its Optional Protocol entered into force in Belgium in 2009.

The UN Convention honours several important principles, among which:

1. **It defines a disability** as the result of an interaction between a person with a disability and the obstacles with which they are confronted in a non-inclusive society.
2. **It heralds a real change of mentality:** a person with a disability is no longer a person without a voice or opinion who depends on help or charity but a person with rights, just like all other citizens.
3. **Participation and inclusion of people with disabilities in society:** the authorities must take measures to progressively ensure the effective right of people with disabilities to be included in all aspects of life in society (work, housing, goods and services, health, education, leisure, etc.). Inclusion aims to transform society by adapting to people’s diversity by eliminating barriers to participation from the

outset. Without structural change, we remain with integration, which implies an individual approach of the person in order to participate.

Moreover, the CRPD reiterates the prohibition of discrimination on the grounds of disability and the right to reasonable accommodation.

In addition to the general principles, the CRPD guarantees specific rights to people with disabilities, such as access to justice (Art. 13), to liberty and security (Art. 14), to health (Art. 25), the right to work and to employment (Art. 27), etc. To find out more about how these rights should be interpreted, the Committee on the Rights of Persons with Disabilities is gradually publishing “general comments” on the provisions of the CRPD. See their website: [General comments | OHCHR](#)

To date, general observations have been adopted for:

- The right to work and to employment, Article 27 (General comment No. 8)
- The right to participate for people with disabilities, Articles 4.3 and 33.3 (General comment No. 7)
- The right to equality and non-discrimination, Article 5 (General comment No. 6)
- The right to independent living, Article 19 (General comment No. 5)
- The rights of women and girls with disabilities, Article 6 (General comment No. 3)
- The right to accessibility, Art. 9 (General comment No. 2)
- The right to recognition as a person before the law, Art. 12 (General comment No. 1)

<sup>7</sup> United Nations Convention on the Rights of Persons with Disabilities, Art. 1.

The implementation of the CRPD by States Parties is monitored by the Committee on the Rights of Persons with Disabilities through [reporting procedure](#) (see section 1: why handstreaming? ➔) and, if the Optional Protocol is signed (which is the case for Belgium), through the possibility of receiving complaints from individuals and investigating on its own initiative.

[Convention on the Rights of Persons with Disabilities | OHCHR](#)

[The United Nations Convention on the rights of persons with disabilities | Unia](#)

## European Treaties, Regulations and directives

- [European Convention for the protection of Human Rights](#) (Council of Europe). The European Convention on Human Rights is a Council of Europe treaty on civil and political rights. The ECHR contains no specific provision on disability, but **all its articles apply to people with disabilities**, including, among others, articles 3 (prohibition of torture and inhumane and degrading treatment) and 14 (prohibition of discrimination). Its enforcement is monitored by **the European Court of Human Rights**, whose case law is an important source for understanding the fundamental rights of people with disabilities.
- [European Social Charter](#) (Council of Europe) **The European Social Charter** is the counterpart to the European Convention on Human Rights in terms of fundamental social and economic rights. It guarantees a broad range of fundamental rights linked to the basic needs of daily life in the areas of employment and working conditions, housing, health, education, social protection and social services. **Article 15 is specific to disability**. It concerns the right of people with disabilities to independence, social integration and participation in community life. **The European Committee of Social Rights** monitors compliance with its provisions via the collective complaints procedure and the State party reporting procedure.
- [European Directive 2000/78/CE establishing a general framework for equal treatment in employment and occupation](#) (EU). This directive establishes a general framework to fight discrimination based on non-racial criteria, particularly disability and concerning **employment and work**. For the first time, it focused on the concept of reasonable accommodations in European law. The directive has been incorporated into Belgian anti-discrimination legislation, which has extended its scope to areas other than employment.
- [European strategy on the rights of people with disabilities 2021-2030](#). The strategy contributes to the implementation of the European Pillar of Social Rights. It contains several intentions, initiatives and appeals to the Member States. The strategy supports the implementation of the CRPD by the European Union and its Member States at both European and national levels.
- [Regulation \(EU\) 2021/782 of the European Parliament and of the Council of 29 April 2021 regarding the rights and obligations of train passengers](#). Article 11 states that “if there is no ticket office or accessible vending machine at the departure station and no other accessible means of advance ticket purchase, persons with disabilities may purchase tickets on board the train at no additional cost”.





- **Regulation (EU) No. 1300/2014** The Commission directive of 18 November 2014 on the technical specification for interoperability relating to the accessibility of the rail system in the Union for disabled persons and persons with reduced mobility. This regulation requires each member state to ensure that an inventory of facilities is established and implemented to identify accessibility limitations, provide information to users and monitor and assess the progress made on accessibility. In addition, it adds that visually impaired people who take the train at unmanned stops should be able to buy a ticket by other means, for example, on the train. It also states that in each station with ticket machines, at least one

must be accessible to wheelchair users and persons with reduced body height.

- **European Accessibility Act (EAA)**. The EAA was formally adopted by the European Union (EU) on 7 June 2019 with the main objective of addressing the divergent **accessibility requirements** in EU member states by creating a common set of accessibility guidelines. EU Member States have two years to incorporate the law into national law and then four years to apply it. The EAA relates to **products and services that are most relevant to people with disabilities, among which computers, ATMs and banking services, smartphones, transport services and mobile applications.**

Belgium is currently incorporating this directive into various legislative initiatives because the products and services concerned are divided between different levels of government and administrations.

- **EU Web Accessibility Directive**. The directive was adopted by the European Parliament and the European Council on 26 October 2016. It aims to standardise and harmonise frameworks regarding the **accessibility of websites and mobile applications** of public sector organisations, except for public service broadcasters and non-governmental organisations that do not offer services specific to people with disabilities. **Since 23/09/2020, all sites must be**

**accessible**, that is to say, they must comply with the WCAG 2.1 level AA standard. Videos published from this date must also be accessible. **Since 23/09/2021, all mobile applications must also be accessible.**

- **Harmonised Accessibility Standards.** This EU directive sets **the minimum accessibility standard** covering **all information and communication technologies (ICT)**, including mobile phones, electronic documents, software and web content. It refers to Web Content Accessibility Guidelines (WCAG) version 2.1 AA as the minimum compliance level. The ICT directive continues to evolve, such that the European Commission has a rolling plan for ICT standardisation that calls for regular updates and the development of new testing methods. The Directive calls on EU Member States to draw up an **accessibility statement** as of 23 December 2021 and every three years thereafter to monitor progress and to begin public reporting.

Some future instruments:

- **European Union: Regulation establishing harmonised rules on artificial intelligence**
- **Council of Europe: [framework] convention on AI, human rights, the rule of law and democracy.**  
Artificial intelligence can significantly impact the lives of vulnerable people, including those with disabilities.

Unia is working to ensure that these target groups are considered in the future legal framework. These legislative instruments are still under negotiation at the time of drafting this toolbox.

## Constitutional Law

- **Article 22ter of the Belgian Constitution:** “Every person with a disability has the right to full inclusion in society, including the right to reasonable accommodations. The law, decree or rule referred to in Article 134 guarantees the protection of this right”. The second part of Article 22 ter imposes affirmative obligations on public authorities. Each legislator must progressively implement the constitutional right in their field of expertise to fully include people with disabilities. The obligation to provide reasonable accommodations remains in immediate effect.

More information on the right to full inclusion in the Constitution : [Le droit à l’inclusion des personnes en situation de handicap désormais dans la Constitution | Unia](#)

## Federal law

- **[Law of 10 May 2007 on fighting certain forms of discrimination \(Anti-Discrimination Act\).](#)** This law, which is a broader incorporation of European Directive 2000/78, prohibits all forms of discrimination, particularly on the grounds of disability, in various areas of federal jurisdiction (employment, goods and services, health, insurance, etc.). The refusal to provide reasonable accommodations for a disabled person is included as a form of discrimination. Other anti-discrimination measures exist for each level of government.
- **[Law of 12 December 2021 introducing the Back to Work programme under the coordination of the “Back to Work Coordinator”:](#)** a Back to Work programme refers to any programme aimed at supporting the recognised



incapacitated beneficiary. With the support of the “Back to Work Coordinator”, the employee is given appropriate support to find a job that matches his or her abilities and needs.

- **Royal Decree of 11 September 2022 amending the codex on well-being at work and the reintegration programme for incapacitated workers’ concerns.**

The above RD provides a new reintegration path. It is now necessary to make a specific assessment of whether a long-term sick worker has a disability. If so, that employee may claim a right to reasonable accommodations. Furthermore, the employer must check whether reasonable accommodations are possible. The employer can no longer unfoundedly refuse to draw up a reintegration plan for a long-term sick employee. Finally, it provides more guarantees for long-term sick workers before a termination of the contract for reasons of medical force majeure can be established.

- **The Royal Decree of 11 February 2019 on setting the conditions for affirmative action:**

affirmative action is a measure that seeks to establish equality for categories of persons for whom it has been demonstrated that inequality exists concerning them. The RD provides a legal framework for private sector employers who want to give a boost to under-represented groups in the labour market.

- Link [Position paper Affirmative Action | Unia](#)

- **2007 protocol between the Federal State and the federated entities concerning the concept of reasonable accommodations.**

This protocol specifically defines the criteria and indicators for reasonable accommodation.

Note: Federated policy levels also have legislation on racism and discrimination. Given the scope of this toolbox, they are not discussed.

- More information can be found in the discrimination lexicon and the Unia database: [Legislation | Unia](#) (more elaborate database in FR-NL languages)

## 4

# Useful information

## Databases

- [Discrimination Lexicon | Unia](#): The Unia' Discrimination Lexicon' explains the different laws that apply in our country in the fight against discrimination.
- [Datahub Equality Data \(unia.be\)](#): Unia has made an inventory of the existing equality data in Belgium. This can be found in the online data hub, where you can easily search for data sources based on different discrimination criteria and domains. As of 2024, the data hub will also include data on the handicap criterion.
- [SDG - Human Rights Data Explorer](#) The Danish Institute of Human Rights has developed an impressive database to determine in a substantiated manner the challenges countries face in the field of human rights by analysing recommendations/reporting (150,000 ) to 67 mechanisms of the international human rights arena (UPR, CRPD, etc.). It helps to map out inequalities. Nearly 60% of these recommendations are directly linked to an SDG target.
- [Home page - Toegankelijk Vlaanderen](#): database accessible environment in Flanders
- [All events | Inter](#): database accessible events in Flanders
- [The accessibility information portal - Access-i](#): database accessible environment and events in Wallonia and Brussels

## Sources

### General

- [Recommendations by Unia](#): All Unia recommendations in the various domains can be found on the website. You can use the search function.
- [Consultation des personnes handicapées sur le respect de leurs droits \(2020\) | Unia](#): On this page, you will find the report of our large survey that we organised with people with disabilities between 3 December 2019 and 1 June 2020. 1,144 people with a disability participated. The survey aimed to identify obstacles that people with a disability face in their daily lives and to orient Unia's work accordingly.
- [Avis - Conseil Supérieur National des Personnes handicapées](#): All recommendations of the [Conseil Supérieur National des Personnes handicapées](#) (CSNPH) in different areas can be found on the website.

### UN Convention on the Rights of Persons with Disabilities

- [Convention on the Rights of Persons with Disabilities | OHCHR](#)
- General comments (clarifying texts) to the UN Convention: [General comments | OHCHR](#)
- Unia Annotated UN Convention on disability: [Convention relative aux droits des personnes handicapées \(unia.be\)](#)

- Federal Disability action plan (2021-2024): [Plan d'action fédéral Handicap \(2021-2024\)](#)
- [Implementing the UN Convention on the Rights of Persons with Disabilities: Human rights indicators \(europa.eu\)](#)

## Handistreaming

- Federal Disability action plan (2021-2024): [Plan d'action fédéral Handicap \(2021-2024\)](#)
- [How to set up inclusive Policy in my cabinet, in my administration? – CAWaBasbl : Handistreaming : comment mettre en place une politique inclusive au sein de mon cabinet, dans mon administration ? - CAWaB asbl](#)
- Brussels plan for integrating handistreaming into public policy: [Plan bruxellois d'intégration du handistreaming dans les politiques publiques \(equal.brussels\)](#)
- [Handistreaming on a federal level : Handistreaming au niveau fédéral - Service Public Fédéral Sécurité Sociale \(belgium.be\)](#)
- [Handistreaming : a miracle solution for inclusive Policy?: Le handistreaming, une solution miracle pour des politiques inclusives ? \(esenca.be\)](#)
- Position note on the participation of persons with a disability in decision making processes: [2022-10-note de position participation des personnes en situation de handicap dans les processus décisionnels.pdf \(belgium.be\)](#)

## Health

- [Results of survey on the impact of Covid on persons with a disability and their close ones: L'impact de la crise du coronavirus sur les personnes en situation de handicap \(2020\) | Unia Resultaten\\_van\\_bevraging\\_impact\\_COVID\\_personen\\_met\\_handicap\\_en\\_naasten.pdf \(unia.be\)](#)
- [Study report with recommendations : accessibility in hospitals for deaf and hard of hearing persons : Rapport d'étude et recommandations: pour une meilleure accessibilité des hôpitaux aux personnes malentendantes et sourdes - Unia](#)

- Position not on the accessibility to hospitals : Note de position CSNPH accessibilité des hôpitaux : 2021-03
- Recommendation on the prioritisation of care during Covid 19: <https://www.health.belgium.be/fr/recommandation-priorisation-des-soins-en-periode-covid-19>
- The prioritization in the hospitals for persons with a disability in times of pandemic: [La priorisation dans les hôpitaux en temps de pandémie pour les personnes en situation de handicap \(2021\) | Unia](#)
- [How to improve Access to health care for people with \(fgov.be\)](#)
- [Ranking e-health inventory and digital divide : La Luss | Classement Inventaire e-santé et fracture numérique](#)

## Work

- [Online learning modules on reasonable accommodations at work : Ediv: Online leermodules: Over redelijke aanpassingen op het werk :](#)
- [On the job with a disability : Au travail avec un handicap | Unia](#)
- Position note employment : [Note de position - Emploi pour les personnes en situation de handicap \(20/02/2023\) \(belgium.be\) :](#)
- [Redirecting limitations to opportunities at work - Verso \(verso-net.be\) : Buig beperkingen op je werkvloer om tot kansen - Verso \(verso-net.be\) :](#)
- Practitioner toolkit on strengthening PES to improve the labour market outcomes of persons with disabilities : [Publications catalogue - Employment, Social Affairs & Inclusion - European Commission \(europa.eu\):](#)

- [Statbel statistics regarding the survey on the workforce 2021: persons with a disability : 3 December, International Day of Persons with Disabilities | Statbel \(fgov.be\)](#)

## Poverty

- [Poverty and disability in Belgium: Pauvreté et handicap en Belgique \(2019\) | Unia](#)
- [Statistics Statbel SILC 2021 Persons with a disability: 3 December, International Day of Persons with Disabilities | Statbel \(fgov.be\)](#)
- [HANDILAB research \(Federal Government Social Security\) : HANDILAB | Service Public Fédéral - Sécurité Sociale \(belgium.be\)](#)

## Mobility

- [Accessibility of SNCB infrastructure and rolling stock for persons with disabilities \(2021\) | Unia : L'accessibilité des infrastructures et équipements de la SNCB pour les personnes en situation de handicap \(2021\) | Unia](#)
- [Wheelchair user Stef taken to school by taxi by the NMBS - Dito vzw \(memorandum Dito vzw\): Rolstoelgebruiker stef wordt door nmbs met taxi naar school gebracht - Dito vzw](#)

## Elections

- [Report on participation of people with disabilities in elections : Rapport sur la participation aux élections des personnes en situation de handicap | Unia](#)
- [Votes of persons with disabilities count during elections : Le vote des personnes handicapées compte pendant les élections | Unia](#)
- [Guides to accessible elections - CAWaB asbl : Guides pour l'accessibilité des élections - CAWaB asbl](#)

## Events

- [Information: Brochures on accessible events Inter: \[Tools.events - Informatie: Brochures over toegankelijke evenementen Inter\]\(#\)](#)
- [Reasonable accommodations for people with disabilities at events in cities and towns : \[Aménagements raisonnables pour les personnes en situation de handicap lors d'évènements dans les villes et les communes | Unia\]\(#\)](#)

## Accessible environment

- [Handbook accessibility to public buildings: \[Handboek Toegankelijkheid Publieke Gebouwen \\(toegankelijkgebouw.be\\)\]\(#\)](#)
- [Guide to designing an accessible building - CAWaB asbl: \[Guide d'aide à la conception d'un bâtiment accessible - CAWaB asbl\]\(#\)](#)

## Digital applications

- [WCAG checklist WebAIM - Standards and legislation – AnySurfer: \[Checklist WCAG 2.1 de WebAIM - Standards et lois - AnySurfer\]\(#\)](#)
- [Position note on the digital divide : \[Note de position - La fracture numérique \\(20/06/2022\\) \\(belgium.be\\)\]\(#\)](#)
- [Digital divide: how to reduce inequalities : \[Fracture numérique : comment réduire les inégalités ? | Unia\]\(#\)](#)

## Artificial intelligence

- [Understanding Artificial Intelligence – and how it affects the disability community. - \[European Disability Forum \\(edf-feph.org\\)\]\(#\) en \[Ensuring Artificial Intelligence systems respect disability rights - European Disability Forum \\(edf-feph.org\\)\]\(#\)](#)
- [Elections 2024: memorandum / Unia : \[Élections 2024 : mémorandum | Unia\]\(#\)](#)

- [UN expert on the rights of people with disabilities: humanity should get the best from artificial intelligence, not the worst | OHCHR](#)
- [Artificial intelligence - Belgian Disability Forum \(belgium.be\)](#)

## Communication

- [Inclusive communication : guide and tips of Unia : Communication inclusive: guide et conseils | Unia](#)
- In times of crisis – opinion : [En temps de crise: Avis 2020/09 - Conseil Supérieur National des Personnes Handicapées \(belgium.be\)](#)

## Organisations

**Which representative bodies and umbrella organisations by and for persons with disabilities advise public services?**

### Representative bodies

- Federal : Conseil Supérieur National des Personnes Handicapées (CSNPH): [Accueil - Conseil Supérieur National des Personnes Handicapées \(belgium.be\)](#)
- Brussels Capital Region: Conseil des Personnes Handicapées Conseil des Personnes Handicapées Brupartners
- COCOF : Conseil Consultatif Bruxellois Francophone de l'aide aux Personnes et de la Santé - section Personnes handicapées : <https://phare.irisnet.be/service-phare/a-propos-de-nous/conseil-consultatif/>
- Wallonia: [Conseil consultatif wallon des personnes en situation de handicap](#)

- French-speaking Community: [Conseil consultatif des personnes en situation de handicap en Communauté française](#)
- Flandres : Vlaamse adviesraad voor en door personen met een handicap: [Vlaamse adviesraad voor & door personen met een handicap. | Noozo](#)
- VGC: Adviesraad Welzijn en Gezondheid : <https://www.vgc.be/wie-zijn-wij/adviesraden-en-werkgroepen/adviesraad-welzijn-en-gezondheid-van-de-vgc>
- German-speaking Community: Beirat für Menschen mit Beeinträchtigungen der Deutschsprachigen Gemeinschaft : [dg-inklusion](#)

### Other bodies

- The [Belgian Disability Forum](#): non-profit organisation (BDF) is the representative of Belgium within the [European Disability Forum](#) (EDF)
- [Unia](#): independent body responsible for the promotion, protection and monitoring of the application of the UN Convention in Belgium.

### Umbrella organisations

- [CAWaB asbl - Le Collectif Accessibilité Wallonie Bruxelles \(Accessibility Collective Wallonia Brussels\)](#)
- [Vlaams Patiëntenplatform \(Flemish Patients' Platform\)](#)
- [LUSS : Ligue des usagers des services de santé \(league of health service users\)](#)
- [PSYTOYENS.asbl : Concertation des usager en santé mentale \(User consultation in mental health\)](#)

### Which organisations can guide you to make the workplace more inclusive?

- [www.ediv.be](http://www.ediv.be)
- [Gelijke kansen | Werkenvoor.be](#)
- [VDAB - Welkom](#)
- [PHARE](#)
- [AVIQ](#)
- [Werkgevers | Actiris](#)
- [Entreprises | Le Forem](#)
- [GTB | Home](#)
- [de Werkplekarchitecten | de Werkplekarchitecten](#)
- [Home - Hands-on Inclusion \(handsoninclusion.be\).](#)
- [Konekt | Disruptief Inclusief](#)
- [www.handicapenarbeid.be](http://www.handicapenarbeid.be)
- [Brailleliga: werken](#)
- [Fédération francophone des sourds de Belgique](#)
- [1 uit de 1000 | Ondernemen en werken voor mensen met een beperking](#)
- [Onbeperktjobstudent | Focus op talent](#)
- [diversicom.be](http://diversicom.be)
- [Doof Vlaanderen](#)

All information and contact details for organisations can be found in the brochure: [Au travail avec un handicap | Unia \(On the job with a disability | Unia\)](#)

### Who can screen a building or event for its accessibility?

- [Inter | Vlaanderen.be](#)
- [Le portail d'information sur l'accessibilité - Access-i](#)

### Who can help you communicate information more clearly to all users?

- [Konekt | Leef voluit in een inclusieve wereld \(Konekt | Live fully in an inclusive world\)](#)
- [Het centrum voor duidelijke taal | Wablieft \(The centre for clear communication/ Wablieft\)](#)
- [Inclusion asbl : Page d'accueil - Bienvenue ! - Inclusion asbl \(inclusion-asbl.be\)](#)
- [Communication inclusive: guide et conseils | Unia: \(inclusive communication : guide and tips of Unia\)](#)

### Who can support you in making your website or digital application accessible?

- [Accessia - Eqla \(lié à l'organisation EQLA\)](#)
- [Eleven Ways](#)
- [AnySurfer - Pour un internet plus accessible \(Anysurfer for a more inclusive internet\)](#)
- [Belgian Web Accessibility Office](#)
- [DiAX – Digital Accessibility Experts](#)

### Where can I book a sign language interpreter (VGT and LSFB)?

- [SISW](#)
- [Interprétation et translittération - Infosourds](#)
- [CAB Vlaanderen](#)

Who can help you make sign language videos (VGT and LSFb)?

- [MUSKaccess – MUSK \(mu-sk.be\)](https://www.mu-sk.be)
- [Home - CAB Vlaanderen](#)
- [Home - visualbox.media](https://visualbox.media)

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Disclaimer: Unia will review the brochure annually with several adjustments needed to keep the toolbox up-to-date. If you notice any errors or wish to add information, please get in touch via the Unia online notification form.

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