



**Strategic Position Paper:**  
**Rebuilding the UN's Approach to Disability Inclusion**  
**in Palestine after the Genocide**

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## Executive Summary

This paper is issued at an unprecedented historical moment for persons with disabilities in Palestine, particularly in the Gaza Strip, where **genocide**, policies of starvation, forced transfer, and an apartheid regime intersect with the near-total collapse of protection systems and essential services. In this context, the ability of the United Nations system to rebuild a disability-inclusive approach constitutes a genuine test of its commitment to the reference frameworks of international law, foremost among them **the Convention on the Rights of Persons with Disabilities (CRPD)**, the United Nations Disability Inclusion Strategy (UNDIS), the Advisory Opinion of the International Court of Justice (ICJ) issued on 19 July 2024, and the General Assembly resolution adopted on 18 September 2024 concerning the illegality of the occupation and the resulting responsibilities of all States and United Nations bodies and agencies.

The annual consultative meeting between the United Nations Resident Coordinator, the United Nations Country Team, and organizations of persons with disabilities represents one of these core tests. It should not be reduced to a procedural event, but rather understood as a **legal obligation** arising from the duties of the United Nations system under the Convention on the Rights of Persons with Disabilities (CRPD), the United Nations Disability Inclusion Strategy (UNDIS), Security Council resolution 2475 (2019) on the protection of persons with disabilities in armed conflict, and the 2024 Advisory Opinion of the International Court of Justice and the related General Assembly resolution, which affirm **the illegality of the occupation** and impose specific obligations on all States and on United Nations bodies and agencies.

A critical reading of the concept note for the consultative session reveals a “minimum-standard” approach: a softened language regarding the crimes of genocide in Gaza; a reduction of structural collapse into mere operational “challenges”; the omission of the international legal framework most relevant to the Palestinian context; and the presentation of the annual meeting as the fulfillment of a procedural requirement in the “Inclusion Indicator” rather than as a **pathway toward institutionalizing partnership and accountability**. The Situation Analysis of Disability (SITAN) report—despite its importance—also appears as an underutilized tool whose findings were neither translated into commitments nor operationalized into action plans. Moreover, the impact of the genocide on data was disregarded, as the report relied on the 2017 population census in a

context that has undergone profound transformation due to the large-scale destruction in Gaza.

In light of this, the present analytical paper outlines four structural priorities that no UN approach can overlook;

- (1) **Institutionalizing disability inclusion** within the United Nations system and linking it to decision-making levels;
- (2) **Investing in the institutional capacities of organizations of persons with disabilities** as structural partners rather than “beneficiaries”;
- (3) **Rebuilding the data system** using internationally recognized methodological tools that respond to the new and escalating disabilities resulting from the crimes of genocide and other international crimes for more than two years, as documented by United Nations experts and international judicial bodies;
- (4) **Embedding disability at the core of the design of recovery and reconstruction plans**, rather than treating it as a secondary element or an operational annex.

Building on this analysis, the paper presents a set of practical recommendations for the Resident Coordinator and the UN Country Team. These include: positioning disability as a structural pillar in recovery planning; institutionalizing UN leadership on disability inclusion and linking it with the Cluster system; allocating multi-year funding to organizations of persons with disabilities (OPDs); establishing a joint national–UN data system; aligning humanitarian pathways with the Convention on the Rights of Persons with Disabilities (CRPD); creating a multi-level monitoring and accountability mechanism, with transparent quarterly reporting; and integrating the legal dimension of genocide into UN planning.

This analytical paper does not offer a procedural critique; rather, it calls for a **fundamental reframing of the UN’s approach** to disability in Palestine. The future of disability inclusion hinges on **leadership, institutionalization, and accountability**. Without these, the annual “consultative” meeting will remain a formalistic milestone, and disability inclusion will continue to be marginalized amid an escalating catastrophe. However, if the paper’s proposals are adopted as a **strategic pathway**, the UN system can shift from rhetorical commitment to actual response, and build a new approach grounded in dignity, justice, and inclusion - one that ensures persons with disabilities are not left behind again.

## 1. Introduction: Context and Significance

This analytical paper comes within an unprecedented historical context for the trajectory of the rights of persons with disabilities in Palestine—a context in which the ongoing genocide in the Gaza Strip, policies of starvation, forcible transfer, and apartheid intersect with a comprehensive structural collapse of protection systems and essential services. Under this catastrophic reality, the extent of marginalization affecting persons with disabilities in humanitarian and development planning becomes clearer than ever, in parallel with the escalation of acquired disabilities, the collapse of rehabilitation services, and the deterioration of the capacities of organizations of persons with disabilities under blockade and funding shortages.

In this context, the annual consultative meeting convened by the United Nations Resident Coordinator and the United Nations Country Team with organizations of persons with disabilities cannot be viewed as a procedural obligation or an operational meeting detached from the broader reality. Rather, it constitutes **a test of the United Nations system's commitment to its legal obligations** under the Convention on the Rights of Persons with Disabilities (CRPD), the United Nations Disability Inclusion Strategy (UNDIS), Security Council Resolution 2475 (2019) on the protection of persons with disabilities in armed conflict, and the 2024 advisory opinion of the International Court of Justice and the related General Assembly resolution, both of which affirm the illegality of the occupation and impose specific obligations on all States, United Nations bodies, and agencies.

However, the concept note prepared by the United Nations for this meeting, as well as the manner in which the Situation Analysis of Disability (SiTAN) has been utilized, raise fundamental questions about the level of institutional ambition, the methodological rigor of a rights-based understanding of the profound structural crisis, and the actual extent of the United Nations system's commitment to the principle of **"Nothing About Us Without Us."** The UN's approach continues to operate within a "minimum-standard" logic, employing softened language regarding the crimes of genocide, characterizing structural collapse as operational "challenges," and reducing participation to an annual consultative meeting that does not translate into changes in decision-making structures or governance mechanisms.

Building on the above, this paper presents a **"strategic position paper"** aimed at reconstructing the disability-inclusion approach within the United Nations system in the occupied Palestinian territory. It goes beyond assessing the concept note or critiquing the

SiTAN report, placing disability inclusion in its rightful position: **a structural issue linked to leadership, governance, financing, data, and accountability**, not a sectoral file managed through scattered meetings or isolated initiatives. The paper draws on the expertise of QADER in the field of disability rights, as well as on a broad knowledge base concerning the reality of disability in Palestine, particularly in the Gaza Strip.

The significance of the paper emerges across three interrelated dimensions:

**First**, it situates the consultative meeting within its **full legal, humanitarian, and factual context**, rejecting any treatment of it as an isolated procedure detached from the ongoing genocide and systemic collapse.

**Second**, it **redefines the relationship** between organizations of persons with disabilities and the United Nations system on the basis of genuine partnership and legally grounded obligations derived from the core of the CRPD, rather than symbolic consultative participation.

**Third**, it proposes a **practical pathway for rebuilding the UN's disability-inclusion approach**, one that moves disability from the margins to the center, and from a limited advisory role to a binding structural position within humanitarian planning, development processes, and recovery efforts.

In this sense, the paper does not address the United Nations alone. Its strategic messages are directed equally toward organizations representing persons with disabilities, national decision-makers, donors, and all actors in the protection and justice landscape. **It is a call for a new UN framework of engagement in Palestine**, one that matches the magnitude of the catastrophe, respects the context, and recognizes that persons with disabilities are living a tragedy within a tragedy, inside a genocide where their voices are neither heard nor their realities seen. Excluding them from protection, planning, or recovery pathways is no longer feasible, nor ethical, nor lawful.

## 2. A Critical Review of the Concept Note for the Consultative Session

### 2.1. Lack of Structural Analysis of the Crisis

The concept note provides a general description of the situation in the Occupied Palestinian Territory, yet it strikingly avoids acknowledging the structural nature of the crisis experienced by persons with disabilities - particularly in the Gaza Strip, following more than two years of genocide, policies of starvation and forcible transfer, and the entrenched apartheid system in the Occupied Palestinian Territory. Rather than addressing this reality as a **fundamental shift** reshaping both the living environment and rights framework, the note confines itself to framing the impacts of the aggression as merely “circumstantial challenges” or “coordination issues,” disregarding the legal and human rights structures that govern the situation.

The extensive destruction, the complete collapse of the health and rehabilitation sectors, the loss of assistive devices, and the devastation of critical infrastructure have created a **multi-layered crisis** that cannot be understood outside the framework of international humanitarian law and international criminal law. This was affirmed by the **International Court of Justice advisory opinion of 19 July 2024**, which declared the Israeli occupation of the entire Occupied Palestinian Territory illegal and outlined its legal consequences, as well as by the **General Assembly resolution of 18 September 2024**, which clarified the responsibilities of the occupying power, third states, and UN bodies alike. Despite the legal centrality of these documents, the concept note disregards the human rights framework, which has now become part of the UN’s own normative reference, thereby weakening its ability to identify the real risks and the “**silent genocide**” to which persons with disabilities are subjected.

The concept note also fails to reference the systematic pattern of direct and repeated targeting of civilians and civilian objects, including hospitals, rehabilitation centers, and electricity and water networks, which are essential for the survival of persons with disabilities. Framing this reality as merely “operational constraints” constitutes a serious reduction, perpetuating a conventional approach that has proven inadequate in addressing the scale of the catastrophe. The UN Special Rapporteur on the right to adequate housing has previously described the **magnitude and severity of the destruction in Gaza as far worse than that witnessed in Aleppo, Mariupol, and even Dresden and Rotterdam during World War II** - a UN characterization that underscores the exceptional nature of this humanitarian disaster. By disregarding the scale of the catastrophe, the concept note deprives the analysis of one of the

most critical indicators of structural collapse and its life-threatening impact on persons with disabilities.

The absence of structural analysis is not merely a technical gap; it reflects a **methodological problem** in understanding the role of the United Nations itself within a context defined by colonial occupation, international crimes, lack of accountability, and ongoing impunity. This absence limits the ability of the consultative meeting to set realistic priorities, build meaningful partnerships with organizations representing persons with disabilities, or design interventions grounded in rights, accountability, and the principles of the Convention on the Rights of Persons with Disabilities (CRPD).

Consequently, any attempt to advance disability inclusion without a **clear and explicit** recognition of the root causes of the crisis, its structural nature, and its implications for humanitarian planning and recovery will remain a symbolic gesture, falling short of addressing the **existential challenges** faced by Palestinians - particularly persons with disabilities - who are disproportionately and more severely affected, especially in Gaza.

## **2.2. Omission of the Aggression on Gaza and Its Impact on Disability Inclusion**

Despite the fact that **the Gaza Strip represents the epicenter of the collapse** in the rights of persons with disabilities, whether in terms of the scale of destruction, the rates of injuries leading to permanent disabilities, the complete disruption of essential services, the severe shortage of prosthetic limbs, wheelchairs, hearing and visual aids, medical mattresses, nutritional supplements, disability-related medications, and medical devices and consumables due to the occupation's prohibition on their entry since the beginning of the aggression, in addition to the **catastrophic shortage of shelter tents** and the compounded risks this creates for persons with disabilities in the winter cold, the concept note treated Gaza as a "**general context**," rather than as an analytical focus or a basis for determining strategic priorities.

**The genocide, starvation policies, and forcible transfer** have resulted in the comprehensive destruction of health, rehabilitation, and social infrastructures, support services, and the homes of thousands of persons with disabilities in the Gaza Strip. Despite this massive structural collapse, the concept note resorted to softened terminology inconsistent with international law, using expressions such as "the war" instead of "the aggression," and referring to "challenges" and "contextual impact," among other terms,



without naming the facts with their precise legal designations. This approach is not merely a linguistic gap; it produces a **de-contextualized narrative** that, in effect, equates the victim with the perpetrator of grave violations, and equates the collapse of services resulting from systematic targeting with a transient “disruption” that might occur under normal circumstances.

This **conceptual crisis** is not a matter of terminology or phrasing; it is a legal and rights-based problem that directly affects the consultative meeting’s ability to identify accurate and realistic priorities. This flaw is clearly reflected in four main areas:

1. **Avoiding any reference to the occupation as the structural driver of violations,** and as the actor responsible for the systemic constraints that impede persons with disabilities from accessing essential services, resources, and life-saving needs and requirements.
2. **Ignoring the genocide as referenced in the proceedings of the International Court of Justice and by United Nations experts,** and disregarding the resulting legal obligations incumbent upon the occupying authorities and the United Nations system pursuant to the ICJ advisory opinion on the illegality of the occupation and its consequences, as well as the 2024 General Assembly resolution.
3. **Replacing precise legal terms such as “forcible transfer,”** which is a defined international crime under the Rome Statute of the International Criminal Court (ICC), **with softened terminology such as “mass displacement,”** thereby obscuring the criminal nature of the events.
4. **Sanitizing the systematic collapse of services by describing it as “operational challenges,”** despite the fact that it is a direct result of the deliberate targeting of protected infrastructure, constituting violations of international humanitarian law and international criminal law.

This conceptual sanitization affects not only the language of reports but also the structure of the meeting itself and its anticipated outcomes; When Gaza is removed from the legal framework and from a rights-based analysis grounded in international humanitarian and criminal law, the core priorities for disability inclusion are likewise removed, such as rebuilding the rehabilitation system, ensuring access to assistive devices, restoring health and psychosocial services, rehabilitating infrastructure, and institutionalizing a rights-based humanitarian response rather than one limited to crisis management.

This omission also clearly contradicts the substance of **the Situation Analysis of Disability (SiTAN)**, which identified Gaza as a central focus and documented the extent of the comprehensive collapse in rehabilitation services, the loss of assistive devices, electricity blackout, the rising rates of injuries leading to permanent disabilities, and the weak humanitarian response for persons with disabilities. Overlooking these findings reflects a disconnect between the UN's diagnosis and the objectives of the consultative meeting, and risks undermining the foundations of sound planning.

Accordingly, the failure to position Gaza as an analytical focal point in the concept note, and the use of terminology that does not reflect accurate and precise legal characterization, raise a fundamental question about the meeting's ability to generate meaningful recommendations and about the extent to which the United Nations Country Team is prepared to reconstruct a substantive disability-inclusion approach that goes beyond procedural minimums and the protocols of "symbolic compliance."

**Gaza is not a "context";** it is the real test of the United Nations' commitments, of the principle of **"leaving no one behind,"** and of the ability to build a just, rights-based humanitarian and development response. It is also a test of the UN system's adherence to its own normative frameworks, foremost among them the Convention on the Rights of Persons with Disabilities, particularly Article (11), which obliges States Parties to take all appropriate measures to ensure the protection and safety of persons with disabilities in situations of armed conflict. It is equally a test of the obligations arising under international humanitarian law, international criminal law, relevant UN advisory opinions and resolutions, and international accountability pathways.

### **2.3. Reducing Structural Collapse to "Operational Challenges"**

The concept note frames the widespread collapse of protection systems and services in Palestine as a set of **"operational challenges"** that can be addressed through improved coordination or additional meetings. This characterization fundamentally reduces the nature of the crisis. The reality is not one of organizational gaps or administrative issues; it is a **comprehensive structural collapse** that has reshaped daily life and created a new reality with disproportionately severe impacts on persons with disabilities.

The destruction of hospitals, the cessation of rehabilitation services, the loss of assistive devices, and the near-permanent interruption of electricity are not **"service issues"** but direct

consequences of systematic destruction, policies of starvation and blockade, and the denial of medical supplies - constituting **existential threats** that cannot be addressed through partial technical solutions. Yet, the concept note frames these facts merely as “**challenges**” requiring better coordination, without acknowledging that they reflect structural disintegration requiring a full-scale reconstruction of the collapsed health and rehabilitation sectors, rather than mere improvements to referral mechanisms or case management.

The same approach is applied to the assessment of organizations of persons with disabilities (OPDs). The concept note portrays their institutional fragility as a matter of capacity gaps, whereas the **SiTAN report** clearly indicates that this fragility is structural, resulting from a collapsed working environment: destroyed offices, displacement of personnel, lack of sustainable funding, and disrupted supply chains. Yet, the concept note presents the issue as merely a “**capacity-building need**,” overlooking that the real risk lies in the fragmentation of the representative structures of persons with disabilities - a cornerstone essential to any rights-based approach and the principle of “**Nothing about us without us**.”

This reduction is further evident in the omission of the direct impact of the occupation - blockade, closures, denial of treatment, and restrictions on the entry of medical equipment and consumables - which are structural elements inseparable from the lived reality of disability. Concealing these facts behind **operational language** that refers vaguely to the “environment,” without identifying the responsible actors or assigning accountability, undermines the human rights framework and strips the analysis of its legal substance.

This abstraction extends to the **disregard of international accountability**. The genocide that has persisted for more than two years in Gaza, the rulings of the International Court of Justice and the General Assembly, the responsibilities of third parties, and the obligations of UN bodies under international law are all absent from the concept note, effectively turning the session into a technical exercise detached from its core human rights and humanitarian context. As a result, disability inclusion is treated as an administrative procedure rather than as part of a broader pathway to protection, justice, and effective remedies.

Downgrading the “structural rupture” to a “procedural detail” produces an inadequate approach that generates recommendations that fall far short of the scale of the catastrophic crises amid genocide. Unless the nature of the collapse is recognized as structural rather than merely a coordination issue, the UN response will continue to produce procedural loops that

fail to touch the core of the crisis: a **tragedy within a tragedy experienced by persons with disabilities in Gaza**.

## 2.4. The Discrepancy Between the Concept Note and the SiTAN Report

The concept note is, in principle, based on the Situation Analysis of Disability (SiTAN). However, the substantive content of the concept note reveals an almost complete disconnect from the report's core findings. The SiTAN provided a clear and largely accurate diagnosis of the situation of persons with disabilities and their organizations, including a precise description of structural vulnerabilities, legal gaps, institutional absence, weak data systems, and the near-total collapse of rehabilitation services in the Gaza Strip. Yet none of this appears in the concept note, as if the entity that produced the report were operating separately from the entity that prepared the note, despite both being developed for the benefit of the United Nations agencies themselves.

The SiTAN report clearly indicated that organizations of persons with disabilities are **unable to perform their core functions** due to the absence of sustainable funding, weak organizational structures, fragmented governmental roles, and the lack of national leadership on disability issues within an inclusion framework. However, **the concept note, like the analytical report itself, avoided translating this diagnosis into clear UN commitments**, instead limiting itself to re-describing these conditions as "challenges" that can be addressed through an **annual meeting or by improving dialogue mechanisms**, thereby disregarding the structural collapses documented in the report and the nature of the UN system's role and obligations.

The gap becomes even more pronounced in relation to the **Gaza Strip**. **The SiTAN report documented** the scale of widespread destruction, the collapse of rehabilitation services, the loss of assistive devices and medical supplies, and the absence of a disability-inclusive humanitarian response. Yet the concept note was **almost entirely silent** on these findings, failing to translate them into any UN objectives, priorities, or follow-up pathways, despite the fact that the magnitude of the humanitarian catastrophe requires a comprehensive intervention rather than a limited procedural approach expressed in generic terms.

The SiTAN analytical report also identified the **data gap** as a strategic risk that obstructs planning and accountability. Yet the concept note did not link the meeting to any **UN commitment to building a data system**, supporting international measurement tools, or

engaging organizations of persons with disabilities in producing disaggregated data, despite this being a core requirement embedded in the UN system's own obligations under the **Convention on the Rights of Persons with Disabilities**, particularly Article 4(3) on genuine partnership with OPDs, Article (31) on the collection of statistics and data, and Article (32) on international cooperation and the importance of efforts aimed at achieving the objectives and purpose of the CRPD, in addition to the obligations under the United Nations Disability Inclusion Strategy (UNDIS).

The most significant issue is that, although the analytical report offered rights-based recommendations with substantive structural content, the concept note stripped them of their essence and recast them in neutral language focused on "coordination," "coherence," and "linkages between plans," without addressing the core gaps highlighted by the report, namely, the **justice gap, the accountability gap, the protection gap, and the legal and policy gap.**

This inconsistency between the analytical report and the concept note does not reflect a technical drafting flaw; rather, it reveals a structural problem in how knowledge is utilized within the United Nations system. The clear diagnosis provided by the SiTAN was not translated into a **roadmap, commitments, or institutional responsibilities**. Instead, it never translated into actionable policy or practice, nor provided the basis for a UN policy or plan. As a result, the report loses its function, the meeting loses its purpose, and the structural gaps remain unaddressed.

## **2.5. Reducing participation and accountability to an annual meeting**

The concept note addresses the UN Disability Inclusion Scorecard (Indicator 5) as a ceiling for accountability rather than a minimum requirement. The annual consultative meeting, which appears in the Scorecard as a **minimum requirement**, is presented in the concept note as the sole framework for participation and partnership. It is as if the UN system's commitment to persons with disabilities is reduced to a mere **hour and a half** of "consultation" with the current Resident Coordinator, Dr. Ramez Al-Akbarov, on 10 December 2025 - after more than two years of genocide in the Gaza Strip - and an **hour and fifteen minutes** in a previous "consultative" meeting with the former Resident Coordinator, Mr. Muhannad Hadi, on 15 October 2024, one year after the genocide in Gaza.

This reduction strips Article 4, paragraph 3, of the Convention on the Rights of Persons with Disabilities of its **binding content regarding genuine partnership** with organizations

representing persons with disabilities, transforming a partnership that fundamentally requires systematic and sustained engagement into an **annual activity** convened only when deemed necessary or when the Resident Coordinator's agenda allows.

Treating the "consultative" meeting as a standalone event, separate from other processes, creates a clear gap in the accountability framework. The absence of a defined timeline, follow-up mechanisms, and clearly assigned responsibilities for UN agencies renders the meeting akin to a procedural event with no structural impact. This approach cannot be considered an adequate response after more than two years of the humanitarian catastrophe in Gaza and decades of structural marginalization of persons with disabilities in both national and UN planning. **The "minimum" is neither a policy nor an approach, and cannot serve as the basis for genuine partnership or justice-based recovery.**

Consequently, the annual meeting shifts from a follow-up tool into a **procedural tool obstructing accountability**, and from a platform to advance partnership into a mechanism used to claim compliance with international obligations without actual fulfillment. **The way forward is not a meeting, but a process; not listening, but commitment; not symbolic consultation, but binding participation that recognizes organizations of persons with disabilities as active stakeholders, not passive listeners.**

## **2.6. Limited Ambition and Weak Institutionalization of Disability Inclusion within the UNCT**

The concept note reflects a limited level of ambition that does not correspond to the scale of the massive collapse that has affected the disability sector over the past two years, particularly in the Gaza Strip, nor to the requirements of a rights-based recovery. The proposals it contains resemble the **organization of a dialogue session** more than the **design of an integrated institutional pathway** within the United Nations Country Team. There is no governed framework identifying who leads the disability file, no coordinated structure linking the various agencies, no defined responsibilities, no timelines, no performance indicators, and no regular, institutionalized follow-up mechanisms with organizations of persons with disabilities. As a result, disability inclusion is left dependent on the fragmented efforts of individual agencies, in the absence of a shared vision or unified mechanism.

The concept note advances a short-term technical approach that confines disability inclusion to the bounds of "**consultation**" and "**coordination**," without building a **sustained system**

for joint planning, developing mechanisms for accountability, or allocating sustainable resources. This approach **contradicts the core of the Convention on the Rights of Persons with Disabilities, which is grounded in institutionalization**, the participation of organizations of persons with disabilities, and the integration of humanitarian and development action. The absence of these fundamental pillars reproduces the same cycle year after year: incomplete data, fragmented interventions, coherence gaps among agencies, and a complete disconnect between the humanitarian vision and development objectives.

This deficiency is not merely a design gap; it is a gap in understanding. It appears that disability inclusion continues to be treated within the United Nations system as a **peripheral issue**, rather than as a central human rights and policy priority that requires genuine partnership, clear leadership, adequate resources, and a binding follow-up pathway. Approaching disability as an “**add-on**” issue rather than a “structural priority” is precisely what prevents any substantive progress, regardless of how many meetings are held or how broad the list of participants becomes.

Without addressing these structural gaps, **leadership, resources, institutionalization, and follow-up**, any consultative meeting, regardless of the level of participation or diversity of attendees, will remain an isolated event that fails to generate any transformation in the UN’s operational architecture or in the lives of persons with disabilities. The impact of this inadequacy is amplified in a context of unprecedented and comprehensive collapse, at the heart of a tragedy within a tragedy, amid a genocide that persons with disabilities experience daily in a devastated and besieged Gaza; where structural gaps become existential threats, and the absence of institutionalization is no longer an administrative shortcoming, but a direct danger to life, rights, and human dignity.

### **3. Analyzing the Situation Analysis of Disability (SiTAN) Within Its National and Human Rights Context**

The Situation Analysis of Disability (SiTAN) report represents one of the key references that should have formed the conceptual foundation for the consultative meeting — not only because it is a recent United Nations report, but because it theoretically provides a clear diagnosis of the disability situation in Palestine. However, a close reading of the report reveals **significant gaps in its methodology, concepts, legal framework, and its ability to capture the structural shifts** brought about by the assault, genocide, starvation, and forced transfer in Gaza. These gaps were not addressed in the concept note; rather, they

were amplified, leaving the concept note disconnected from the report, and the report disconnected from reality.

### 3.1. Methodological and Structural Gaps in the Report

The analytical report (SiTAN) states that it relied on a “**comprehensive methodology**” that included a review of national literature, studies, and human rights reports. However, the actual referencing does not reflect reliance on the core analytical papers produced by national organizations representing persons with disabilities in Palestine — foremost among them QADER for Community Development — such as:

- *The urgent appeal issued by QADER: Disability-Inclusion Needs as a Priority in the Humanitarian Response and Reconstruction in Gaza (October 2025).*
- *The analytical paper on women and girls with disabilities in contexts of conflict and occupation from the perspective of the Palestinian experience, submitted to the CRPD Committee as part of its new global guidance (October 2025).*
- *The analytical report on the use of starvation as a weapon of genocide and its systematic impacts on persons with disabilities in Gaza (July 2025), and the analytical report on the List of Issues related to the State of Palestine’s official report under the CRPD and the follow-up report submitted to the UN Committee in Geneva (July 2025).*
- *The analytical paper on the national protection system (the Protection Centers Regulation for Women Survivors of Violence and the National Referral System for Women Survivors of Violence), highlighting the absence of disability inclusion and weaknesses in governance and legislative policy (November 2025).*
- *The analytical paper on the right to marriage for persons with disabilities, examining legislative restrictions and international obligations, including a legal and human rights analysis of the draft Personal Status Law 2025 (September 2025).*
- *The analytical paper about Palestinian children with disabilities under colonial occupation: patterns of violations, accountability pathways, and remedies (November 2024).*
- *A briefing on the rights of children with disabilities under the assault on Gaza (November 2024).*



- *The analytical paper about the rights of persons with disabilities in Palestine — challenges and proposed solutions, providing an in-depth review of the rights, inclusion framework, and legislative and policy gaps (January 2023).*

And other studies and analytical papers published by QADER in the national context and in the broader context of colonial occupation.

Although these materials are significant and substantive, they were not systematically incorporated into the report, resulting in conclusions that are fragile in some areas and repetitive in others. As for the report's claim that it adopted a "**participatory approach**," this stands in clear contradiction to the fact that it was not shared with national organizations representing persons with disabilities prior to the consultative meeting — a practice inconsistent with the standard of **genuine partnership** set out in Article 4(3) of the CRPD. It is difficult to speak of "**participation**" in a product from which rights-holders were excluded.

### 3.2. Gap in the International Legal Framework Applied

The report focuses on the international human rights law framework, yet entirely overlooks the legal frameworks most relevant to the Palestinian context, marked by colonial occupation, genocide, starvation, forced transfer, and an apartheid regime, including:

- **International Humanitarian Law (the Geneva and Hague Conventions)**
- **International Criminal Law (International Criminal Court)**
- **The Advisory Opinion of the International Court of Justice (19 July 2024)**
- **The General Assembly resolution on the Advisory Opinion and the resulting obligations (18 September 2024)**
- **Security Council Resolution 2475 (2019) on the protection of persons with disabilities in armed conflict**

These references constitute a binding United Nations framework and are essential for any analysis of the genocide and the systematic violations that have shaped the environment in which persons with disabilities live today. The absence of these references produces an incomplete reading, obscures the "**perpetrator**," and reframes international crimes as "challenges," stripping the report of its human rights substance. This omission also extends to other fundamental concepts.

### 3.3. The Data Dilemma and Reliance on the 2017 Census

The report bases disability prevalence on the results of the 2017 Population and Housing Census, using the narrow definition, even though:

- The last “specialized disability survey” was conducted in 2011 (the first and only specialized survey).
- Gaza has experienced, over the past two years, the largest wave of injuries and disabilities resulting from the assault in decades.
- The United Nations itself has estimated that more than 90% of homes in Gaza have been destroyed or damaged.
- And 96% of Gaza’s population is facing catastrophic levels of food insecurity.

How can United Nations planning rely on data that are eight years old in a context that has been fundamentally transformed by genocide and the massive destruction described by the Special Rapporteur on the right to adequate housing in his 2024 report to the Human Rights Council **as worse than what occurred during the Second World War**, relative to the size and population of the Gaza Strip? This is not a technical gap, **but a structural failure in knowledge production** — one that directly affects planning, funding, programming, and recovery.

### 3.4. Absence of a Rights-Based Lens in Assessing the Reality

The SiTAN report assumes that disability is managed through “**weak institutional capacities**” and “**coordination gaps**”, yet it overlooks that:

- The concept of genuine partnership under an inclusion approach as an international obligation under the CRPD.
- The national legal framework is not aligned with the requirements of the CRPD.
- The government does not have a published or governed “National Disability Plan.”
- The Sectoral plans have been suspended under the 2024 government emergency plan.
- The 1999 Disability Rights Law, in Article (7), requires government institutions to submit their annual plans and reports related to services for persons with disabilities to the Ministry of Social Development — which does not take place.

- The 1999 Disability Rights Law, in Article (9), mandates the development of systems and regulations to ensure protection of persons with disabilities from all forms of violence, exploitation, and discrimination — which have not yet been developed.
- Health Insurance Regulation for Persons with Disabilities No. (2) of 2021, which is in force, has not yet been implemented.
- The OPDs operate in a context of blockade, assault, and financial collapse — not in a normal environment.

The report also treats OPDs as organizations in need of “capacity-building,” while the more fundamental question is missing: **who should be held accountable for the absence of capacities? And who holds the resources and the authority?** A top-down, directive approach contradicts the essence of Article 4(3) of the CRPD, which establishes **genuine partnership** as a legal obligation — not a grant and not a “participatory space.”

### 3.5. Weak Linkage Between Diagnosis and Implementation

The analytical report (SiTAN) offers sound recommendations in principle, yet there is no:

- **Timeline** for implementing any of the report’s recommendations.
- **Accountability mechanism** within the UNCT or across UN agencies.
- **Implementation plan** outlining phases, resources, or measurement indicators.
- **Defined responsibilities** for UN agencies, nor a clear distribution of roles.
- **Joint follow-up mechanism** with organizations of persons with disabilities.
- **Alignment** between the report and the ongoing humanitarian and human rights analysis in Palestine.
- **Structural linkage** between the report and the consultative meeting that is expected to rely on it as both a conceptual and operational foundation.

In effect, the report shifts from being an analytical document meant to steer the disability-inclusion process into a non-binding consultative paper — one that is read but not acted upon, left suspended between the production of knowledge and the absence of institutional will to translate that knowledge into an operational pathway. How can a report of this magnitude, with such extensive data and such critical insights into structural collapse, not serve as a mandatory reference for the only annual meeting dedicated to organizations of persons with disabilities? And how can a “consultative” meeting take place without placing

the report's findings on the agenda, discussing them, building on them, or sharing them with participants in advance?

This discontinuity does not reflect a technical shortcoming, but **a governance and process gap** that empties the disability-inclusion effort of its substance and may turn the “consultative” meeting into a formal procedure, disconnected from the analytical tools produced by the United Nations system itself.

#### **4. The Structural Priorities Identified by QADER for Disability Inclusion**

QADER considers the disability-inclusion approach in humanitarian planning, recovery, and development **not to be a technical pathway** built on scattered initiatives, **but a structural project** that reflects the extent of commitment by the United Nations system and national actors to human dignity and to the right not to be excluded. Disability is not a sectoral file that can be addressed through delayed “add-ons,” but **a foundational standard** that measures the ability of the humanitarian and development systems to uphold rights in the most fragile and complex environments, in a time of genocide.

**Institutionalization** is the primary entry point and the necessary condition for achieving disability inclusion; a sustainable approach cannot be built without a clear organizational structure, governance mechanisms, and decision-making bodies that place disability at the core of United Nations planning. In the absence of this foundation, the humanitarian response will remain dependent on the individual initiatives of UN agencies, while the rights of persons with disabilities will remain contingent on “circumstances” rather than standards. Therefore, QADER affirms the need to shift from a model based on “**seasonal consultation**” to a model grounded in **clear institutional leadership**, follow-up pathways, and a shared vision that is binding on all, with genuine partnership with representative organizations of persons with disabilities at **all stages of action**, as an internationally binding legal obligation under the CRPD.

QADER places particular importance on **supporting the institutional structure of organizations of persons with disabilities**, as they constitute the foundation without which no genuine inclusion approach can stand. These organizations cannot be tasked with central roles in planning, monitoring, documentation, or participation in recovery while they are facing an unprecedented financial and structural collapse, especially in Gaza, where disability

has become a tragedy within a tragedy within a genocide. The ability to participate requires resources, independence, and equitable partnership.

**The national data system** is one of the pillars of disability inclusion. Evidence-based planning cannot be built on data that are outdated, non-disaggregated, or dispersed across UN agencies and national entities. The use of internationally recognized tools such as the Washington Group Questions, and in accordance with the CRPD, along with the shift toward generating strong data on disabilities emerging and worsening because of the assault and genocide, constitutes a priority and is a prerequisite for developing realistic policies that respond to a rapidly changing reality. The absence of accurate data does not only lead to incorrect estimates, but also to incorrect decisions, and to the reproduction of marginalization in relief and recovery programs.

QADER believes that the effective inclusion of disability in **recovery and resilience-building plans** is the central anchor at this historical moment. Including disability only in emergency response, while it is absent from early recovery plans, reconstruction, governance, infrastructure, and social and health policies —and in the absence of a genuine and serious partnership in accordance with the CRPD — means rebuilding a system that reproduces the very forms of exclusion that preceded the catastrophe. Rights-based recovery requires that disability be a standard in design, implementation, budgeting, and performance indicators — not merely an addition at a later stage.

In this context, **reforming humanitarian pathways** requires a clear shift from a needs-based approach **to a rights-based approach** grounded in inclusion. Rights establish mandatory standards for protection, non-discrimination, and accessibility, and ensure the inclusion of persons with disabilities in targeting mechanisms, referral pathways, risk-management plans, and early-warning systems. A needs-based approach, by contrast, remains governed by shifting individual interpretations and keeps the most vulnerable groups outside the scope of priority.

These priorities, as viewed by QADER, do not represent a theoretical vision, but an **existential requirement** to ensure that persons with disabilities do not continue to bear the highest cost at every stage of the catastrophic crisis: from bombardment, forced transfer, and starvation, to emergency response, to recovery, to reconstruction. They also constitute the foundation upon which any new strategic partnership with the United Nations system must be built; a

partnership that moves beyond symbolism toward accountability, beyond consultation toward institutionalization, and beyond rhetoric toward action.

## 5. Strategic Recommendations for the Resident Coordinator and the United Nations Country Team

The advanced analysis presented in this paper, together with **the governance, leadership, and institutional gaps** it reveals, and the limitations in ambition and the absence of linkage between **“priorities, challenges, and opportunities”** and **actual implementation** pathways reflected in the concept note, necessitate a shift toward **a new operational model for disability inclusion**. Comprehensive recovery, as referenced by the United Nations system, cannot be built on a formalistic approach or on an **“annual consultative meeting”** in which participation and partnership are reduced in contradiction to the provisions of the CRPD. Therefore, QADER presents a set of practical recommendations that serve as an entry point for rebuilding the disability inclusion pathway within the United Nations system in the occupied Palestinian territory, transforming “opportunities” and “priorities” into clear and measurable commitments:

### 5.1. Including Disability as a Structural Pillar in Recovery and Reconstruction Planning

QADER affirms that including disability in national and UN recovery planning cannot be treated as an “opportunity” or a “secondary priority,” but as a structural criterion against which the inclusiveness of recovery plans is measured. Therefore, it is necessary to:

- **Include disability as a core criterion in all recovery documents** (from early relief to reconstruction and resilience-building).
- **Identify the barriers faced by persons with disabilities** as part of the core risk analysis within each sector.
- **Require UN agencies to demonstrate disability inclusion** in their funding proposals and programs before approval within the UNCT.

In this way, disability becomes **a condition for approval**, not an optional item.

## 5.2. Institutionalizing United Nations Leadership on Disability Inclusion and Linking It to Decision-Making Levels

Assessing “challenges” and “opportunities” without a clear leadership structure reproduces the current fragmentation. Therefore, QADER recommends that:

- Responsibility for disability inclusion elevated to **the decision-making level within the Office of the Resident Coordinator.**
- Responsibility be institutionally linked to all sectoral Working Groups (Clusters).
- Direct responsibility be incorporated into the job descriptions of senior leadership positions within UN agencies in Palestine.

Comprehensive recovery cannot be achieved while the disability file remains **outside leadership and institutional responsibility.**

## 5.3. Investing in the Institutional Structure of Organizations of Persons with Disabilities (OPDs)

QADER considers the treatment of OPDs as “beneficiaries” of capacity-building programs to be one of the core challenges overlooked by the concept note. Therefore, it is necessary to:

- Recognize OPDs as leading actors in comprehensive recovery planning.
- Allocate multi-year funding windows that enable them to operate.
- Build strategic partnerships with them in documentation, monitoring, and follow-up.

Recovery that excludes representatives of persons with disabilities will neither be inclusive nor just.

## 5.4. Rebuilding the National–UN Data System

The concept note reflects a “commitment to strengthening data,” yet without mechanisms or obligations. Therefore, QADER recommends establishing:

- **A unified national and UN system for disaggregated data based on the disability inclusion approach.**
- Using approved methodological tools (such as the Washington Group Questions).
- Methodological tools that are grounded in the definition of disability set out in the CRPD.

- Ensuring the meaningful participation of organizations representing persons with disabilities in producing and analyzing the data.

Data is not a technical opportunity; it is **the foundation of planning** and the centerpiece for accountability and impact.

### 5.5. **Aligning Humanitarian Pathways with the Convention on the Rights of Persons with Disabilities (CRPD)**

The concept note focuses on “opportunities for alignment,” yet the absence of practical linkage renders alignment merely descriptive. Therefore, QADER recommends that:

- Accessibility, protection, and referral standards be included in all stages of humanitarian action.
- Each Cluster be required to submit quarterly reports on implementation to ensure disability inclusion.
- Accessibility arrangements be incorporated into reconstruction and infrastructure plans.

Linking humanitarian action with development must be grounded in **rights**, not procedures.

### 5.6. **Establishing a Multi-Level and Transparent Follow-Up and Accountability Mechanism**

“Priorities” and “challenges” cannot be translated into an operational pathway without a clear follow-up framework. Therefore, QADER recommends that the accountability mechanism include:

- **Quarterly progress reports** published publicly within an institutionalized and organized workstream.
- Assessment of compliance with the UNDIS.
- Field-level accessibility and effectiveness indicators (Accessibility, Protection, Participation).
- Formal and binding participation of organizations representing persons with disabilities as observers and partners in the assessment.
- Linking results to funding decisions and resource allocation.

Commitments that are not subject to **accountability** remain rhetoric, not policy.



### 5.7. Integrating the Legal Dimension of Genocide into United Nations Planning

The concept note refers to “challenges,” yet it does not incorporate the human rights dimension generated by the genocide, the starvation policy, and the forced transfer in Gaza. Therefore, QADER recommends that the United Nations system adopt:

- Explicit recognition that disability today is being shaped and exacerbated **within a context of genocide and a compounded humanitarian catastrophe**.
- Linking recovery planning to the relevant international standards (CRPD, IHL, ICC, ICJ Advisory Opinion).
- Developing recovery interventions that consider disability-related needs arising from the ongoing assault on the Gaza Strip.

Without this foundation, United Nations planning will be neither **realistic nor just**.

### 5.8. Transforming the Annual Consultative Meeting into a Sustained Partnership Track

Focusing on “opportunities” without a framework for sustained partnership only reproduces the same gap. Therefore, QADER recommends that the annual session be transformed into:

- **A track consisting of four meetings per year.**
- With clear follow-up plans.
- A time frame for implementing the recommendations.
- Regular review of performance indicators.
- And linking the sessions to the outputs of SiTAN, UNDIS, and national data.

In this way, consultation is transformed from **a protocol-driven procedure** into **a governance tool**.

These recommendations constitute a **practical roadmap** for moving from diagnosis to action, and from minimum measures to full human rights commitment. They lay the foundation for a new strategic partnership between OPDs and the United Nations system, grounded in rights, accountability, and shared leadership, ensuring that disability is placed at the center of recovery and reconstruction in the Gaza Strip, which has been under blockade for many years, and at the core of the humanitarian and development response in Palestine — so that persons with disabilities are not left at the margins once again.

## 6. Conclusion: Toward a New United Nations Approach that Leaves No Person with Disabilities Behind

The in-depth analysis presented in this paper, and the structural imbalances it reveals within the United Nations system and in its approach to disability inclusion in the occupied Palestinian territory, clearly demonstrates that the annual consultative meeting — in its current form — cannot serve as **the tool capable of meeting the responsibilities of this moment**. The context in which persons with disabilities are living is not an ordinary one that can be addressed through minimum-standard approaches; **it is a context of ongoing genocide, systematic starvation, and the comprehensive collapse of the basic foundations of life**. In this context, disability is not merely an additional “vulnerable group” added to lists of those affected; rather, it becomes a defining indicator of the credibility of the United Nations’ commitment to human dignity, international law, and the principle of **leaving no one behind**.

This analytical paper has shown that disability is not a “sectoral file” inserted into reports, nor a theme summoned once a year for consultation in contradiction to the provisions of the CRPD, nor a technical matter addressed through a protocol meeting. Disability, in the Palestinian experience — especially in devastated Gaza — **is an ethical, human rights, and policy mirror** that reflects the degree of coherence within the United Nations system, the depth of its understanding of reality, and its ability to transform diagnostic knowledge into binding and measurable courses of action. Unless the United Nations system recognizes that persons with disabilities are the starting point for any humanitarian and development planning, its work will remain disconnected from reality, and the gap will remain wide — and continue to widen — between discourse and results, between “verbal commitment” and “actual response.”

From this standpoint, constructing a new pathway for disability inclusion requires a fundamental shift in structure, leadership, and institutionalization. In a context marked by genocide, starvation policies, forced transfer, and an apartheid regime, it is no longer possible to persist with a model built on fragmentation, piecemeal initiatives, or a single meeting characterized by “consultation without tools” and “listening without commitment.” The required transformation must begin with recognizing that disability, in the context of colonial occupation, genocide, and blockade, is inherently a political and human rights matter, and that assessing needs without examining the structural causes merely reproduces the injustice

itself. Therefore, any serious approach must integrate the international legal framework — including international humanitarian law, international criminal law, the advisory opinion of the International Court of Justice, and the 2024 General Assembly resolution — into the core of planning, rather than relying solely on the minimal contours of a human rights framework.

As this paper has demonstrated, **genuine partnership** with organizations representing persons with disabilities is not a “consultative space” granted when time permits, but a legal obligation under Article 4(3) of the Convention on the Rights of Persons with Disabilities (CRPD) — an obligation that requires structural participation in planning, an influential voice in follow-up, and a leading role in shaping the priorities of response and recovery. Reducing this partnership to a formal protocol undermines the essence of the Convention and results in continued models of practice that neither address realities nor alter their direction.

The gaps outlined in this paper; **the leadership gap, the governance gap, the data gap, the financing gap, and the accountability gap**, are not technical details, but **determinants of existence** for any approach intended to be effective, sustainable, and aligned with the principles of disability inclusion. The Palestinian experience, in all its severity, demonstrates that the absence of clear leadership leads to fragmentation; that the absence of governance results in conflicting pathways; that the absence of data produces institutional blindness; that the absence of financing undermines the national role of organizations representing persons with disabilities; and that the absence of accountability renders United Nations commitments closer to promises without impact. Accordingly, without addressing these gaps collectively, disability inclusion will remain a technical add-on rather than a structural pillar of a United Nations approach grounded in justice.

The shift from an “**annual meeting**” to a “**sustained partnership track**” is not an administrative luxury, but an ethical, political, and human rights imperative to protect persons with disabilities and to ensure that recovery and reconstruction plans are **just, inclusive, and capable of rebuilding what the assault has destroyed in a manner that does not reproduce marginalization but eliminates its roots**. This requires institutional will on the part of the United Nations, translated into time-bound commitments, performance indicators, regular follow-up, and financial and knowledge-based partnerships with national organizations..

In light of this, this paper is neither a critique of a mechanism nor a commentary on a meeting:

- **It is a roadmap for a new architecture of United Nations action;**
- An approach that acknowledges reality as it is, not as it appears in official statements;
- An approach that views disability as a core policy priority, not a marginal item;
- An approach that restores the centrality of rights, partnership, justice, and accountability;
- An approach that makes the protection of persons with disabilities a strategic obligation, not a symbolic space.

If there is one conclusion with which this analytical paper may be closed, it is **that the humanitarian and development future of Palestine will not be shaped by protocol-driven meetings, but by genuine partnership, clear institutionalization, bold leadership, and uncompromising accountability.** In a time of genocide, rescue is not enough; what is required is **the reconstruction of a United Nations approach grounded in dignity... and centered on the protection of human beings.**