POLICY RECOMMENDATIONS ON ACCELERATING INCLUSIVE EMPLOYMENT OF PERSONS WITH DISABILITIES IN BANGLADESH

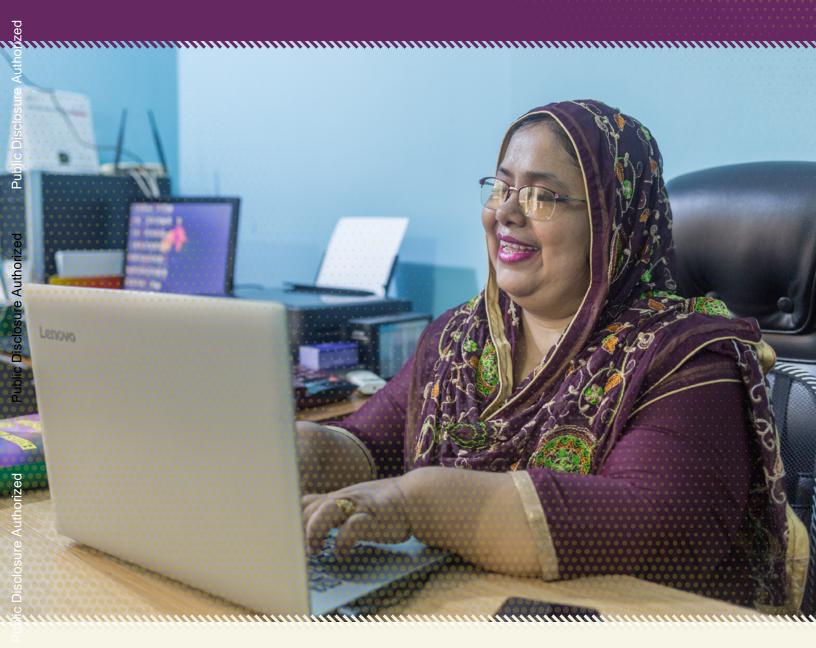


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List of Acronyms

a2i	Access to Information	MSME	Micro, Small, and Medium Enterprise
CBID	Community-Based Inclusive Development	NGO	Non-Government Organization
CRPD	Convention on the Rights of	NMC	National Monitoring Committee
GDP	Persons with Disabilities Gross Domestic Product	OPD	Organization of Persons with Disabilities
ICT	Information, Communication, and Technology	PDRPA	Persons with Disabilities Rights and Protection Act
JPUF	Jatiyo Protibondhi Unnayan	SDG	Sustainable Development Goals
	Foundation (National Foundation for Development of Disabled Persons)	TVET	Technical and Vocational Education and Training



I. Introduction

Disability inclusion is an important development issue that calls for policies and actions that ensure the rights and participation of persons with disabilities in their daily and civic life.

The United Nations Convention on the Rights of Persons with Disabilities (CRPD) lays out the rights of persons with disabilities to full and effective participation and inclusion in society equally with others. The Convention views disability as a result of the interaction between an inaccessible environment and a person, rather than an inherent attribute of an individual. It adopts the "social and human rights model" over the "medical model," based on the fact that it is society that "disables" persons with disabilities from exercising their human rights as people. Several of the rights enshrined in the CRPD are furthered in the Sustainable Development Goals (SDGs),

with disability specifically included in SDG 4 (education), SDG 8 (employment), SDG 10 (reducing inequalities), SDG 11 (cities), and SDG 17 (partnerships).¹

Disability-inclusive development directly responds to the World Bank's twin goals of ending extreme poverty and promoting shared prosperity.2 Disability and poverty are inherently linked, with persons with disabilities having poorer health outcomes; lower education achievements; less economic participation; and higher rates of poverty than people without disabilities. Poverty may also increase the risk of disability, by leading to the onset of health conditions associated with disabilities, such as malnutrition; low birth weight; lack of clean water and sanitation; and unsafe work and living conditions. The development challenges faced by persons with disabilities need to be addressed through a multisectoral and multidimensional approach that entails measures to improve accessibility and equality of opportunity;

¹ Information on disability-inclusive SDGs can be found here: https://www.un.org/disabilities/documents/sdgs/disability-inclusive-sdgs.pdf

² The World Bank Group commitments to accelerate global action for disability-inclusive development in key areas such as education, digital development, data collection, gender, post-disaster reconstruction, transport, private sector investments, and social protection: https://www.worldbank.org/en/topic/socialsustainability/brief/world-bank-group-commitments-on-disability-inclusion-development

promotes participation and inclusion; and increases respect for the autonomy and dignity of persons with disabilities.

Ensuring the social and economic inclusion of persons with disabilities in Bangladesh remains a challenge. In order to break the cycle of disability exclusion and poverty for persons with disabilities and their households, access to work and or livelihoods is essential. This note provides a set of recommendations to support the equitable participation and inclusion of women and men with disabilities in the labor market through a variety of mechanisms, including legislative policies; education and skills development; self and wage employment; social protection; accessibility; and the importance of changing attitudes.3

³ This policy brief is based on findings from background research on inclusive employment of persons with disabilities, which provides a review of the socioeconomic situation of persons with disabilities in Bangladesh and policies and programs that would support their participation and inclusion in the labor market.

II. Country Context

Over the past two decades, Bangladesh has experienced steady economic growth, resulting in more than 25 million people being lifted out of poverty.⁴

This growth was made possible by the government's robust policies and investments, supported by an enterprising private sector, an active non-government sector, and development partners. The rapid poverty reduction is associated with falling fertility rates and reduced dependency ratios; better education outcomes; and growth in labor incomes. Earned income is a key driver in poverty reduction, specifically wage and self-employment, and to maintain this trajectory, Bangladesh must shift from lower productivity to higher productivity jobs, including diversifying from agriculturebased production toward manufacturing and service sector roles.

To ensure growth benefits its citizens, it is important that employment is inclusive for all people, including persons with disabilities. Approximately 7 percent of Bangladeshis live with a disability, with more women identifying as having a disability. There is a large employment gap of 19 percent between persons with and without disabilities (35 percent vs. 54 percent, respectively). Moreover, only 5 percent of women with disabilities are employed, compared to 54 percent of men with disabilities.5 In 2008, the World Bank estimated that excluding men and women with disabilities from the labor market in Bangladesh resulted in an annual loss of \$891 million (or 1 percent of GDP).6 Comparatively, the International Labour Organization estimates between 3 to 7 percent of GDP is lost annually due to excluding persons with disabilities throughout the global economy.⁷

⁴ The World Bank. Bangladesh Poverty Assessment: Facing Old and New Frontiers in Poverty Reduction (2019).

⁵ Bangladesh Bureau of Statistics (2015). Disability in Bangladesh: Prevalence and Pattern. Population Monograph, Volume 5.

⁶ The World Bank. Disability and Children at Risk Project Appraisal Document (2008)

⁷ Buckup, Sebastian (2009). The Price of Exclusion: The Economic Consequences of Excluding People with Disabilities from the World of Work.

The primary legislation governing disability rights in Bangladesh is the Persons with Disabilities Rights and Protection Act (2013).8 The Act is well aligned with the CPRD, which Bangladesh ratified in 2007, and aims to end disability discrimination and create pathways for equitable participation of persons with disabilities.9 The Act promotes the rights and dignity of persons with disabilities and emphasizes the need to address barriers they face to equal and full participation in social, economic, and cultural activities and extends the accountability and coordination structure down to the sub-district and city levels, recognizing involvement of organizations of persons with disabilities (OPDs) and other civil society groups.

⁸ The "Persons with Disabilities Rights and Protection Act" and "Disability Act" are used interchangeably.

⁹ Please see Section 4 "Legislative and Policy Framework" of the Background Report on Inclusive Employment of Persons with Disabilities for more information on the CRPD and the Disability Act.

III. Key Challenges

While there is strong national legislation and policy on disability inclusion, implementation has been slow due to several factors, including the lack of clear operational guidelines, comprehensive data, and an accountability framework.

The government recently worked to rectify this through its approval of a National Action Plan (2019) to operationalize the Disability Act. However, the plan appears stymied due to a lack of reliable or comparable national disability data and has further implications for policy making, program designing, and resource allocation.

Successful labor market participation of persons with disabilities is inextricably linked to different sectors and systems. These include, education and skills building; access to information; social protection; infrastructure and transport, and access to justice.

In Bangladesh, most primary, secondary, and tertiary education systems are not inclusive of persons with disabilities, resulting in lower education and skill levels, and subsequently, lower employment rates of persons with disabilities.

Public and private infrastructure, including buildings and transportation, information, and communications, remain largely inaccessible. Similarly, most social protection systems are not designed to enable broader participation in skills development and livelihood opportunities for persons with disabilities.

Policies to incentivize employers in the private and public sector to employ women and men with disabilities remain weak. There are few private sector employers committed to investing in and employing persons with disabilities due to a variety of factors, ranging from stigma and misconceptions around the productivity of persons with disabilities to lack of knowledge about providing reasonable accommodation.¹⁰ Despite a

¹⁰ These findings are based on a range of key informant interviews and focus group discussions with a range of stakeholders (private sector, persons with disabilities, organizations of persons with disabilities) as noted in the background report (World Bank, 2021). See also, Inclusive Futures and Institute of Development Studies, 2020; and Jalil, 2012.

public employment quota system, persons with disabilities account for less than 1 percent of all public sector jobs, with little to no tracking of fulfilling quotas. A recent decision to eliminate the quota system for "gazette" officers (Class I and II), has resulted in lack of clarity as to whether this applies to persons with disabilities and other vulnerable groups.

Persons with disabilities still face high levels of stigma, and although attitudes are slowly changing, a low level of labor force participation remains. Noting that persons with disabilities are not a homogenous group, discrimination differs based on the type of disability. For example, persons with developmental or cognitive disabilities typically face additional barriers to accessing work compared to people with physical disabilities. The stigma and inequities faced across the spectrum of disability must be addressed in order to create equitable pathways to work for all.

¹¹ The Bangladesh Civil Services is structured vertically into four classes (Class I-IV), with associated levels of responsibility, educational qualification, and pay range. Class I is the professional or officer class and other classes perform a variety of supporting functions. All Class I and part of Class II officers are treated as "gazette" officers, while the rest are considered "non-gazette" officers. (Taken from Recruitment and Selection Process in Bangladesh Civil Service: A Critical Overview, 2012).

IV. Recommendations

The Government of Bangladesh can strengthen their approach to disability inclusion through its policies and governance structures. Given that only one in five Bangladeshis are engaged in waged work, with the vast majority engaged in informal self-employment, it is important that policies and action plans incorporate both formal and informal pathways to employment, and that programs include pro-poor initiatives as persons with disabilities are disproportionately represented among those living in poverty.

The recommendations span nine focus areas: policies and programs; data; education and skill building; employment; social protection; gender; accessibility and reasonable accommodation; access to justice; and stigma. The matrix further organizes these recommendations across three timeframes—short (3 years), medium (5 years), and long term (10 years, through 2030), aligning with the timeline for the SDGs—and with the main institutions responsible for each action.

These recommendations are also in line with the National Action Plan, which now requires concerted implementation efforts within and across ministries, supported by clear lines of responsibility and adequate budget. Finally, all policies and corresponding implementation should center on the compounding discrimination faced by persons with disabilities with multiple identities including women and girls with disabilities.



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DESIGN AND IMPLEMENTATION OF POLICIES AND PROGRAMS

Mainstreaming disability as a cross-cutting issue across policies and programs allows persons with disabilities to participate equitability and equally with others in activities and services intended for the general public, such as education, health, employment, and social services.

1.1. The Government of Bangladesh should expedite establishment of the Disability Development Directorate as the central authority to coordinate, monitor, and implement national initiatives in line with the Disability Act and CRPD.

Following the Cabinet's endorsement to elevate the status of the National Foundation for Development of Disabled Persons (JPUF) into a full-fledged Directorate under the Ministry of Social Welfare, there has been slow progress in the necessary administrative reforms. It is critical that the Directorate be provided with adequate technical and financial resources to carry out its functions, including facilitating dialogue, coordination, and engagement between ministries and with civil society, including representatives of persons with disabilities.

1.2. Revitalize and strengthen established committees on the rights and protection of persons with disabilities.

A comprehensive structure for accountability and coordination to ensure implementation of legislation and policies related to persons with disabilities was established in 2001 and enhanced and updated following ratification of the CRPD and Disabilities Act. This includes committees at the national level—National Coordination Committee and National Executive Committee on the Rights and Protection of Persons with Disabilities and the National Monitoring Committee (NMC)—as well as committees at the

district and sub-district levels. The committees have been weak and unable to fulfill their mandate. Civil society and persons with disabilities should be actively involved in the committees to harness the full range of coordination and potential impact. The NMC should also have a clear monitoring framework to promote and monitor implementation of legislation, policies, and practices in relation to disability-related employment. At the public sector level, the framework should create and integrate key performance indicators around disability inclusion into all ministries' annual performance agreement systems.

1.3. Barriers to participation should be identified and addressed.

Using updated and uniform disaggregated disability data and research to understand the interaction of persons with disabilities and the environment, the government should seek to revise and mainstream policies, institutions, and environments, and allocate budget resources that would enable programs that support labor force participation and poverty alleviation to be accessible to and inclusive of persons with disabilities. This should include an audit and analysis of public sector quotas and private sector incentives to employ persons with disabilities to identify the constraints and barriers to be addressed.

1.4. Program and project financing should include inclusive budgeting.

Costs relating to reasonable accommodation12 and accessibility13 to ensure persons with disabilities are meaningfully included in policy making, program design, and participation must be adequately budgeted. This could include organizing and financing accessible transportation; ensuring accessibility of the building and the broader environment where activities are conducted; facilitating accessible communication (such as sign language interpretation, captioning, and other assistive technology); and consulting with participants with disabilities to understand what type of accommodation best supports their participation. Targets and quotas for proportional representation of persons with disabilities in policy making and program participation may be considered and introduced.

¹² Reasonable accommodation means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms (UN-CRPD).

¹³ Accessibility enables persons with disabilities to live independently and participate fully in all aspects of life, on an equal basis with others, in terms of the physical environment; transportation; information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas (UN-CRPD).



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DATA

Understanding the numbers of persons with disabilities and their circumstances can serve as a trigger to remove disabling barriers and provide services to allow persons with disabilities to participate. Collecting accurate and regularly updated statistical and research data is essential to inform evidence-based policy making and appropriate budget allocation. This is in line with SDG target 17.18,14 which calls for the "availability of high-quality, timely, and reliable data disaggregated by income, gender, age, race, ethnicity, migratory status, disability, geographic location, and other characteristics relevant in national contexts."

¹⁴ More information on SDG 17 indicators can be found here: https://www.un.org/sustainabledevelopment/globalpartnerships/

2.1. Disability data collection should be standardized and mainstreamed across all major national surveys and programs and provide disaggregated data.

A cost-effective approach would be to add the Washington Group Disability

Questions across national surveys, such as the National Census, Household Income and Expenditure Survey, Labour Force Survey, and Demographic and Health Survey. The Washington Group Sets of Disability Questions, have been specifically constructed to be efficient, low cost, and easy to incorporate into ongoing data collections of national statistical systems, making them sustainable, internationally comparable, and suitable for disaggregating and monitoring progress in attaining the SDGs.

2.2. Dedicated disability surveys should be carried out to gain extensive information on disability and functioning.

This should include, but not be limited to, data on prevalence; health conditions associated with disability; use of and need for services; environmental factors, including on persons living in institutions and children; pay equity between women and men with and without disabilities; additional cost of having a disability, including transportation costs; costs of reasonable accommodation at work; and adequacy of social safety nets. All data should be disaggregated by disability, gender, and age to allow policy makers

to be better informed when developing policies and programs that meet specific needs of the population.

2.3. All program ministries should maintain updated administrative data on persons with disabilities.

Most ministries and agencies maintain a management information system that allows them to keep a record of their clients and beneficiaries. However, these may not be disaggregated at the level of disability. Modifying records to include this information would allow policy makers to understand more accurately the participation of persons with disabilities in various programs and enable individual longitudinal tracking over time and across services.



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EDUCATION AND SKILL BUILDING

Education and skills development are foundational to enabling access to decent work. However, youth with disabilities often lack access to formal education or to opportunities to develop their skills—missing out during the primary and secondary school years, resulting in exclusion from vocational or technical training in later years.

As the government continues to build on its success of increased coverage, access, and gender parity in education, it also needs to focus on an inclusive system that aims to close the education gap for learners with disabilities across all age groups and between girls and boys. This would require investments in physical accessibility, curricula and materials, and teacher training on inclusive education.

The recommendations in this section are more specific in relation to vocational and skill building opportunities and aim to support Bangladesh to meet SDG indicator 4.5, which includes eliminating gender disparities between women and men with disabilities in vocational training. ¹⁵ A separate analysis on access to education would help to inform policy and programs on disability-inclusive primary, secondary, and tertiary levels.

3.1. Barriers of access to and retention in technical and vocational education and training (TVET) should be reviewed and addressed.

Recognizing that completion of the eighth standard at the secondary level is mandatory for entrance into TVET institutions, the government should actively seek opportunities to support inclusive education at the secondary level and create affirmative or equitable entrance requirements for persons with disabilities who may face

barriers in accessing general education . This could include accelerated prevocational training courses and expanding pre-training to build basic knowledge and skills of persons with disabilities. The government may also want to consider waivers on entry fees and provision of stipends for persons with disabilities to minimize dropout. Investments should also be made to ensure physical access to classrooms and dormitories; provide accessible e-learning platforms, including assistive devices, accessible technology, and content; and shaping attitudes and the capacity of trainers to impart skills to persons with disabilities.

3.2. Differentiated gender barriers must be addressed.

The government should seek to ensure equal opportunities for women and men with disabilities in accessing TVET. Efforts should be made to reach out specifically to women with disabilities, since they may be less likely to enroll and ensure womenfriendly facilities. Course offerings should be both gender-sensitive and accessible and targeted to the specific needs of women with disabilities.

3.3. The range of course offerings should be market responsive.

Courses offered through TVET and alternative forms of training should be expanded to encompass market demands because there may be an underlying assumption that persons with disabilities are capable of only a few occupations.

¹⁵ More information on SDG 4 indicators can be found here: https://www.un.org/sustainabledevelopment/education/

The range of activities for improving employment prospects for persons with disabilities should be looked into, such as soft skills, training in technology, reskilling, and upskilling programs, which target workers already in a specific field but that need to consistently update their skills to remain relevant in their field.

3.4. TVET programs managed by nongovernmental organizations (NGOs) should be assessed to meet a minimum standard and scaled up.

The government should assess good performing programs, and those meeting the minimum 5 percent quota, that are managed by NGOs and OPDs, to scale up such programs or key features that have worked in drawing in participation of persons with disabilities.



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EMPLOYMENT

Persons with disabilities are disadvantaged in the labor market due to various factors, such as lack of access to education and training; the nature of the workplace; or employers' perceptions of disability. Persons with disabilities may also need flexibility in work scheduling to allow adequate time to prepare and travel to work, and to deal with health concerns.

In Bangladesh, approximately **four out of five** Bangladeshis are self-employed, with more persons with disabilities entering **self-employment rather than wage employment**.

Policies related to disability-inclusive employment must also encompass measures to ease constraints and provide growth opportunities for the self-employed.

Article 27 of the CRPD recognizes the role of government to safeguard and promote the realization of the right to work by taking steps to provide access and opportunities for decent work. Similarly, SDG target 8.5 aims to "achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value" by 2030. The recommendations in this section focus on mechanisms that could stimulate and strengthen employment opportunities for persons with disabilities.

4.1. The government should facilitate mechanisms that would allow matching employment opportunities with job seekers.

Lack of information on job opportunities and prospective employees who may be qualified to meet the requirements is a constraint on employment. Private job matching services and training institutions can play an important role in providing national and local job networks and information that link persons with

disabilities to each other and to potential employers. In addition, the government should facilitate job fairs, especially for female and disadvantaged trainees who may require more specialized career support. To facilitate matching skills to jobs, a centralized data management system may be set up through training institutions that contains records of graduate trainees with and without disabilities, including skills and qualifications, and that allows graduates to update their personal information and employment status.

4.2. The digital economy offers employment opportunities for persons with disabilities.

Some of these jobs are not location-specific and only require on-the-job training, such as developing and selling information, communication, and technology (ICT) software and hardware or working in call centers and may be more conducive for persons with disabilities to participate. High-tech parks being developed in Bangladesh also provide an excellent opportunity for inclusive employment and the government should make the necessary investments to ensure these parks are accessible and inclusive in terms of their physical environment and communications and ICT accessibility. The government should invest in bridging the digital divide by supporting digital skills and ensuring affordability and accessibility. Women with disabilities should be targeted and encouraged to train for ICT related jobs.

¹⁶ Information about indicator 8.5 can be found here: https://sdgs.un.org/goals/goal8

4.3. The government should invest in economic inclusion programs tailored to the needs of persons with disabilities.

Individuals from low-income households face multiple simultaneously binding constraints that either limit their ability to become employed (wage or self-employed) or restrict them to low-return economic activities. This is further compounded for persons with disabilities, who may have faced exclusion from obtaining soft and technical skills, lack of mentorship, and lack of networks necessary for job matching. For those that wish to become self-employed, absence of business management knowledge and constrained access to finance are significant barriers that impede success. An economic inclusion program approach identifies the combination of services that need to be provided and then flexibly provides these services tailored to the needs of the individual.

4.4. Targeted employment programs can make an important contribution to the employment of people with severe disabilities.

Community-based Inclusive Development (CBID)¹⁷ initiatives may be a means of social and economic integration for persons with

disabilities: this would involve the combined efforts of persons with disabilities; their families; organizations; communities; and government and nongovernmental health, education, vocational, social, and other services.¹⁸

4.5. Creating affirmative procurement programs that emphasize supplier diversity can support businesses run by, or that hire persons with disabilities.

These programs incentivize procurement or business-to-business transactions between disability-owned microenterprises and disability-owned or disability-inclusive medium-to-large enterprises, both for the government and the private sector. This should ideally come with supply side technical assistance to support micro, small, and medium enterprises (MSME) to meet market requirements. In addition, the government can consider preferential or reserved access to government procurement opportunities for persons with disabilities and other vulnerable groups.¹⁹

¹⁷ Community-based inclusive development was formerly known as community-based rehabilitation, or CBR.

¹⁸ Bhutan's <u>National Policy for Persons with Disabilities</u> promotes a family approach to livelihood, whereby the government provides training programs that are designed to build the skills of both persons with disabilities and their family members. Other CBID good practice can be found in ILO's good practice guide.

¹⁹ This is being implemented in Kenya through the Access to Government Procurement Opportunities (AGPO) Program, which facilitates enterprises owned by women, youth and persons with disabilities to be able to participate in Government opportunities based on the legal requirement that 30 percent of Government procurement opportunities be set aside specifically for enterprises owned by these groups. As a result, the program aims at empowering these groups by providing opportunities to do business with Government (https://agpo.go.ke/pages/about-agpo).

4.6. The private sector should be encouraged to hire, mentor, retain, and promote persons with disabilities.

It is important that the government work on both supply and demand sides, by preparing persons with disabilities for work while also making employers and work conditions more inclusive. The Disabilities Act outlines tax breaks for businesses that employ persons with disabilities, but this practice can become ineffective, de facto, due to cumbersome and bureaucratic systems. The incentive regime and practice should be reviewed to ensure it serves the purpose for which it was designed. As MSMEs account for close to 98 percent of enterprises in Bangladesh and are the largest source of non-farm employment, inclusive employment policies will need to consider the specific support these firms may require—to participate in growth opportunities as disabled-owned firms and to be incentivized to hire employees with disabilities.

4.7. Dispel misconceptions about the ability of persons with disabilities to work.

Ignorance, stigma and prejudice can be factors in excluding persons with disabilities from opportunities for employment or promotion in work. In addition to misguided perceptions, employers also lack information about inclusive policies, talent sourcing pipelines, accessibility, and reasonable accommodation solutions. Aside from financial incentives, innovative interventions, such as using industry leaders who can demonstrate the value of a diverse workforce, and diversity training programs are required to change mindsets on disability and promote positive attitudes about disability in the workplace.



Photo Credit: Habiba Nowrose, Leonard Cheshire.

SOCIAL PROTECTION

Poverty and disability are mutually reinforcing and contribute to increased vulnerability and exclusion. Well-designed social protection programs have the potential to improve the welfare of≈persons with disabilities by alleviating poverty and vulnerability and ensuring access to food, health education, and other support services; enhancing employability; and fostering social inclusion and civic participation

Article 28 of the CRPD recognizes the right of persons with disabilities to an adequate standard of living and to social protection, and requires governments to take measures to ensure they receive equal access to mainstream social protection programs and services and specific programs and services for disability-related needs and expenses.

5.1. The government should ensure adequate budget allocation to programs for persons with disabilities.

In FY2020, expenditure on disability-related programs amounted to 0.3 percent of the total social protection expenditure. Coverage and transfer amounts should be increased so the poorest and most vulnerable members can benefit.

Faced with COVID-19 and other future shocks, programs should increase benefitsthrough the expansion of cash transfers to in-kind food and non-food item distribution—to cater to the higher cost of living and help cushion the short-term loss in income, and reduce the adoption of negative coping mechanisms, such as cutting down on meals. Special attention should also be paid to ensure those who may have been left out of coverage, whether due to not having a disability card, or those who have recently fallen into poverty due to the pandemic, have access to programs designed to address their particular vulnerability. Some disabilities may also imply extra costs that need to be covered, such as health services, medication, help with daily activities, and assistive devices. The absence of benefits to cover these costs may lead to deterioration in the person's health or is offset by a reduction in other necessary expenses. Adequacy levels should therefore also be mindful of reflecting the extra costs of disability.

5.2. Programs and projects linking social protection with livelihood and income generating activities should be made inclusive for persons with disabilities.

Besides programs targeted to disabilities, persons with disabilities should have access to mainstream programs that provide a phased, intensive, and holistic package of support comprising elements of social protection, livelihood promotion, financial inclusion, and social empowerment. See also recommendation 4.3 on economic inclusion programs.

5.3. The government should invest in information centers to improve access to information and services and strengthen coordination between service providers.

Union Digital Centers and government-run Disability Support Centers should be strengthened to ensure people can access information on social protection, employment programs, and other social services in one place. To complement these centers, efforts should also be made to ensure information reaches all persons with disabilities (ranging from those with limited mobility to people with sensory disabilities), including through door-to-door initiatives and use of technology.

These recommendations reflect measures that are cross-cutting across all domains and should be ensured to enable inclusivity.



Photo Credit: Habiba Nowrose, Leonard Cheshire.

GENDER

Women with disabilities in Bangladesh are almost twice as likely to be excluded from skills development and work opportunities compared to men with disabilities or women without disabilities. Enabling women to acquire skills—domestic, technical, or professional—is essential to help them break out of the cycle of poverty and vulnerability. It is imperative that all policies and programs seek to be inclusive of women with disabilities, who face intersectional, compounding barriers to discrimination because of their gender and disability.

6.1. The government should review and revise legislation, policies, and programs to support equitable pathways for women with disabilities.

Quota systems in the sphere of education, training, and employment should be reviewed to understand their role and performance in achieving gender parity. Women with disabilities are more excluded than their male peers and may require additional support and targeting to be job ready. Training for women should encompass a broad range of skills, including core skills for work and an emphasis on building confidence. Skills development should not be limited only to traditionally female-dominant roles, such as tailoring and food preparation, but also explore new areas such as information technology, which offers other advantages, as referred to in recommendation 4.2. Finally, as part of the broader objective of promoting female labor force participation, ancillary support, in the form of access to childcare, safe transportation, and female-friendly spaces, should be ensured. The Ministry of Women and Children's Affairs should also take a lead role in coordinating various initiatives under other ministries to ensure they encourage intersectional approaches that create equitable, tailored, and affirmative pathways for women with disabilities.

6.2. The government should explore partnerships with industry associations and networking platforms to enhance outreach and coordination.

Formal and informal associations and networks are an important channel for empowering women with disabilities to have their voices heard, while also supporting them to build social networks. Collaborating with the Women's Chamber of Commerce and Industry, Bangladesh Business and Disability Network, and women-focused organizations and OPDs can help identify needs and priorities, advocate for women-focused priorities, and advance solutions for change and collective awareness.



Photo Credit: Access Bangladesh Foundation.

ACCESSIBILITY AND REASONABLE ACCOMMODATION

Access to public infrastructure is a critical component in enabling persons with disabilities to participate in civic life and is essential for education, healthcare, and labor market participation. Lack of access to the built environment—such as transport, buildings, and spaces—means persons with disabilities are likely to be excluded from services and social contact.

On the other hand, inaccessible information and communication reinforces the digital divide and creates barriers to inclusion for persons disabilities.

The CRPD mandates accessibility, mobility, and reasonable accommodation throughout its Articles²⁰ as each domain is interconnected: persons with disabilities cannot benefit fully from improvements in one domain if others remain inaccessible.

7.1. The government should focus its efforts on implementing existing policies that enable the inclusion of persons with disabilities.

Following enactment of the Persons with Disabilities Rights and Protection Act (2013), more recent policies have been prepared or revised to incorporate disability-inclusive provisions, although implementation lags. The updated National Building Code was approved in late 2020 and gazette notification issued in February 2021. The updated Code includes principles of universal design²¹ to promote an enabling and accessible environment from both infrastructure and information aspects. A timebound action plan should be prepared to modify existing public buildings, prioritizing education institutions, healthcare facilities, and government offices to be accessible and inclusive.

7.2. With information and communication moving increasingly online, digital technologies present an unprecedented opportunity to include persons with disabilities.

The COVID-19 pandemic accelerated this transition and it would be essential to ensure persons with disabilities are not left behind because technologies, products, content, and services are not created with accessibility in mind. Partnering with global organizations with expertise in advancing digital accessibility, , which supports policy makers with capacity building programs, policy development tools, and benchmarking, Access to Information (a2i) should conduct digital accessibility audits to identify current gaps in accessing web-based services for persons with disabilities and put forward national guidelines to promote the accessibility of virtual environments, also covering issues of affordability.

²⁰ Articles 9 (<u>Accessibility</u>), 19 (<u>Living Independently and Being Included in Community</u>), 20 (<u>Personal Mobility</u>), and 27 (<u>Work and Employment</u>) are examples of ensuring accessibly, mobility, and reasonable accommodation, although these concepts are espoused throughout the Articles.

²¹ Universal design means the design of products, environments, programs and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design (CRPD).

7.3. The government should establish a set of minimum standards for accessible transport, including grievance mechanism system for reporting and penalties for lack of compliance. Inclusivity and accessibility in public transportation should be a key priority, particularly in urban development planning.

Exclusion from access to transport is a predominant obstacle to personal independence; finding and retaining employment; participating in economic activities; receiving an education; emergency evacuation; and social participation. The government may consider incentives for private sector transport operators, similar to those offered to employers, based on meeting specific inclusive transportation standards. Over the longer term, the government should invest in key transportation systems to be more inclusive and accessible for persons with disabilities, bearing in mind differences between urban, peri-urban, and rural needs.22

7.4. The government should partner with industry and employer associations to create guidelines on how to adapt the workplace to be inclusive of persons with disabilities.

Translating national policy on reasonable accommodation into practice requires sector-specific guidelines on how to practically adapt the workplace across various sectors for persons with different types of disabilities. This would also include assistive devices and special equipment and will require harnessing industry and technical expertise and the participation of persons with disabilities. In addition, resources should be provided—in the form of technical assistance²³ and/or financial support—that would help employers build inclusive workplace cultures by accommodating persons with disabilities entering the workplace and those who may acquire disability during their employment. Combining reasonable accommodation and accessibility support will ensure that the general workplace environment is as accessible as possible, while providing the individualized support that a person may need to access the workplace.

²² In urban areas, the focus should be on establishing low or no cost inner-city transportation to enable persons with disabilities to move between job sites and their homes easily. For rural areas, the focus should on transport that allows individuals to move themselves, and their goods/services between villages, especially to and from central market hubs or trading centers.

²³ The <u>Job Accommodation Network</u> and <u>Employer Assistance and Resource Network on Disability Inclusion</u> provide good examples of government-run technical support on reasonable accommodation and accessibility for employers, employees, jobseekers and entrepreneurs.



Photo Credit: Access Bangladesh Foundation.

ACCESS TO JUSTICE

Ensuring equal access to justice for all persons with disabilities contributes to the enjoyment of their rights, their legal empowerment, and equality before the law. In Bangladesh, persons with disabilities experience disproportionate levels of discrimination and therefore require more protection from the law. Barriers to full access to justice still exist due to laws that may limit their legal capacity and equal recognition, inheritance, or equal opportunities in education and employment on the basis of disability, in particular intellectual disabilities.

In addition, inaccessibility of courts, police stations, and legal documents; and lack of disability awareness of legal officers are barriers that prevent equal access to justice. Articles 12 and 13 of the CRPD stipulate that persons with disabilities must benefit from equal recognition before the law to exercise their fundamental rights, and that they are afforded equal access to justice when their rights are violated.

8.1. The government should strengthen mechanisms for reporting discrimination.

In its Initial Report under Article 35 of the CRPD, the Bangladesh National Human Rights Commission was mandated to ensure the rights and privileges of persons with disabilities until a separate Disability Rights Commission is established. The National Human Rights Commission should be strengthened through orientation and training on potential discrimination and recourse measures to cater to persons with disabilities, and supported to report on the CRPD.

8.2. The Department of Inspection for Factories and Establishments (DIFE) should expand its inspection checklist forms to cover disability-inclusive measures as part of its standard inspections.

Over the longer term, the government should broaden DIFE's mandate to carry out periodic surveys to inspect accommodation and accessibility measures by those firms benefiting from disability incentives and to collect feedback from the employees on their experience.

8.3. The judicial system—including courts, police stations, other legal services, and documents—should be made accessible for persons with disabilities.

Physical, information, and communication accessibility and affordability of legal services and institutions are essential to ensure persons with disabilities have recourse to the law for any discrimination or violation of their rights. Universal design guidelines under the National Building Code should be followed to ensure physical premises are accessible, while the provision of basic legal support and legal aid may accommodate financial burdens. Training on disability inclusion should also be provided to all law enforcement officers.



Photo Credit: Habiba Nowrose, Leonard Cheshire

STIGMA

Negative attitudes towards persons with disabilities remain as significant barriers in all domains. Stigma and discrimination contribute significantly to labor market exclusion of women and men with disabilities and addressing this—at the level of government, institutions, employers, and families—is key to building an inclusive system.

9.1. The government should partner with OPDs and professional associations to run public information campaigns to dispel stigma around disability.

The campaigns should focus on information dissemination and awareness raising, both general and targeted to particular audiences. Involving the media is vital to the success of these campaigns and to ensuring the dissemination of positive stories about persons with disabilities and their families, which the disability community also needs to expand efforts to enhance awareness of the presence, capacities, and potential of persons with disabilities.

9.2. The government should introduce mandatory training for all government officials on disability inclusion.

The training should be part of the standard civil service curriculum, and in induction training for all government employees. This should also include specialized training, such as disability training among healthcare, education, and social assistance providers, and legal service providers and legal officers, on specific needs of persons with disabilities, the importance of accessibility, and how to strengthen the quality of services.



Photo Credit: Habiba Nowrose, Leonard Cheshire

POLICY MATRIX

RECOMMENDATIONS FOR ACCELERATING DISABILITY INCLUSIVE EMPLOYMENT

Please note that the numbering below corresponds to the numbering of recommendations in the text above, within the "Policy Brief on Accelerating Inclusive Employment of Persons with Disabilities in Bangladesh." For more information about a recommendation, please refer to that numbered section within the policy brief text.

Short-term (3 years) Policies and progr	Medium-term (5 years)	Long-term (10 years)	Responsible institutions
 1.1. Expedite establishment of the Disability Development Directorate. 1.2. Revitalize and strengthen committees established for the rights and protection of persons with disabilities and hold regular meetings. 	itoring framework to promote and monitor implementation of legislation, policies and practice in relation to disability-related employment, including key performance indicators in ministries' annual performance agreement systems.	Continued monitoring of implementation, assessing key gaps and gathering beneficiary feedback, with necessary corrective action.	All government bodies, Committees on Rights and Protection of Persons with Disabilities, Cabinet Division, MoF, MoSW, PMO, NHRI/ NHRC?
Data			
2.1. Standardize and mainstream disability data collection across national surveys using Washington Group Questions.	2.2. Develop and administer dedicated disability surveys.2.3. Program ministries to maintain administrative data on persons with disabilities.		BBS, MoSW, SID, all program ministries National Statistical Bureau or its equivalent?
3.1 & 3.2. Review barriers on access to TVET, with focus on gender barriers. 3.4. Assess programs carried out by non-government institutions.	3.3. Update course offerings to reflect market demand, gender needs and aspirations of and suitability for persons with disabilities.	Invest in all tiers of the education system to ensure that persons with disabilities are supported in skills building from early years through the employment life cycle.	BMET, DTE, MoE, MoWCA, MoYS, NSDA, NGO/OPD

Employment

- **4.1.** Develop and expand job matching services.
- **4.6.** Review incentive regime and practices for private sector employers to hire persons with disabilities.
- **4.7.** Develop and disseminate information campaign for changing attitudes at the workplace.
- **6.1.** Review programs and policies so they support gender equity objectives.

- **4.2.** Expand opportunities for persons with disabilities to engage in digital economy.
- **4.3.** Develop and expand economic inclusion programs, including special employment programs for those with severe disabilities.
- **4.5.** Develop and expand affirmative procurement programs.
- 6.2
- **& 7.4.** Create partnerships with industry associations for networking opportunities and creating sector specific guidelines for reasonable accommodation and accessibility.

Ensure longer term analysis and evaluation of employment participation to support economic participation across all types of disabilities.

BCC, BSCIC, DTE, HTPA, MoF, MoI, MoInfo, MoLE, MoLGRDC, MoPTIT, MoSW, MoWCA

Social Protection

- **5.1** Ensure adequate budget allocation to programs for persons with disabilities.
- **5.2** Livelihood programs made inclusive of persons with disabilities.
- **5.3** Strengthen information and support centers to improve access for persons with disabilities.

Ensure longer term analysis and evaluation of the impacts of social protection programs on economic participation of persons with disabilities

azi, Cabinet Division, MoF, MoPTIT, MoSW, MoWCA, MoDMR and other social protection implementing ministries

Accessibility and Reasonable Accommodation

- **7.1** Prepare timebound action plan for implementation of National Building Code 2020 and modification of existing priority infrastructure.
- **7.2** Conduct digital accessibility audits and prepare guidelines to promote accessibility of virtual environments, also covering issues of affordability.
- 7.3 Create incentive regime for private sector transport operators to ensure transportation facilities are accessible for persons with disabilities.
- 7.1 Modify public buildings, with priorities on education institutions, healthcare facilities and government buildings.
- **7.3** Invest in key transportation systems to be inclusive of persons with disabilities.

azi, BCC, City Corporations, MOE, MoHFW, MoHPW, MoLGRDC, MoLJPA, MoPTIT, MoP, MoPME, MoRTB

Short-term (3 years) Access to Justice	Medium-term (5 years)	Long-term (10 years)	Responsible institutions
 8.1. Strengthen National Human Rights Commission to respond to discrimination against persons with disabilities and report on the CRDP. 8.1. Ensure disability-inclusive indicators in DIFE's inspection checklist. 		8.1. Expand DIFE's mandate to inspect accommodation and accessibility measures in firms benefiting from disability-related incentives and/or tax breaks.	DIFE, MOLE, NHRC
9.1. Run public information campaigns to dispel stigma around disability.	9.2. Introduce mandatory training for all government officials on disability inclusion.		MoCA, MoInfo, MoPA
List of Acronyms			
BBS: Bangladesh Bureau of Statistics; BCC: Bangladesh Computer Council;		MoLJPA: Ministry of Law, Justice and Parliamentary Affairs;	
BSCIC: Bangladesh Small an Corporation;	d Cottage Industries	MoP: Ministry of Planning; MoPA: Ministry of Public A	dministration;

Corporation;

DIFE: Department for Inspection of Factories and Establishments;

HTPA: Hi Tech Park Authority;

MoCA: Ministry of Cultural Affairs;

MoE: Ministry of Education;

MoF: Ministry of Finance;

MoHFW: Ministry of Health and Family Welfare; **MoHPW:** Ministry of Housing and Public Works;

Mol: Ministry of Industries;

MoInfo: Ministry of Information;

MoLE: Ministry of Labour and Employment;

MoLGRDC: Ministry of Local Government, Rural

Development and Cooperatives;

MoPME: Ministry of Primary and Mass Education; **MoPTIT:** Ministry of Post, Telecom and Information Technology;

MoRTB: Ministry of Roads, Transport and Bridges;

MoSW: Ministry of Social Welfare;

MoWCA: Ministry of Women and Children's Affairs;

MoYS: Ministry of Youth and Sports;

NHRC: National Human Rights Commission; **NSDA:** National Skills Development Authority;

PMO: Prime Minister's Office;

SID: Statistics and Informatics Division.

V. Additional Resources and References

Access Bangladesh Foundation. http://www.accessbangladesh.org/research/.

Bangladesh Bureau of Statistics. 2015. Disability in Bangladesh: Prevalence and Pattern. Population Monograph, Volume 5. http://203.112.218.65:8008/ WebTestApplication/userfiles/Image/PopMonographs/disabilityFinal.pdf.

Brigitte Rohwerder. GSDRC Disability Inclusion Topic Guide.

https://gsdrc.org/topic-guides/disability-inclusion/the-situation-of-people-with-disabilities/poverty-and-disability/.

Buckup, Sebastian. 2009. "The Price of Exclusion: The Economic Consequences of Excluding People with Disabilities from the World of Work." Employment Working Paper No. 43, International Labour Organization, Geneva, Switzerland. https://www.ilo.org/employment/Whatwedo/Publications/working-papers/WCMS_119305/lang--en/index.htm.

Centre for Disability in Development and GIZ. "Towards Disability Inclusion: A Handbook for Inclusion of Persons with

Disabilities in Government Programmes and the Apparel Industry."

https://www.ethicaltrade.org/sites/default/files/shared_resources/towards_disability_inclusion.pdf.

Disability Rights Promotion International. 2017. "Employment Rights of Persons with Disabilities in India." Disability Rights Promotion International, Toronto, Ontario, Canada. http://drpi.research.yorku.ca/wp-content/uploads/2018/08/Hyderabad-Report-English.pdf.

Global Initiative for Inclusive ICTs. https://g3ict.org/country-profile/bangladesh.

Government of Bangladesh. 2013. Rights and Protection of the Person with Disabilities Act, 2013. https://www.mindbank.info/item/3831.

Government of Bhutan. 2019. National Policy for Persons with Disabilities in Bhutan, 2019. https://www.gnhc.gov.bt/en/wp-content/uploads/2019/06/1.-Final-Draft_NPPWD_May_2019.pdf.

Government of Kenya. Access to Government Procurement Opportunities. https://agpo.go.ke/.

Government of United Kingdom. 2020. Disability Confident 2020. https://disabilityconfident.campaign.gov.uk/.

Inclusive Futures and Institute of Development Studies. 2020. Bangladesh Situational Analysis Version II - June 2020. https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/15525/DID%20SITAN%20Bangladesh%20Version%20II%20June%202020.pdf?sequence=1&isAllowed=y.

International Labour Organization. 2020. "Questions on Disability and Work: Key Issues on Promoting Employment of Persons with Disabilities." International Labour Organization, Geneva, Switzerland. https://www.ilo.org/global/topics/disability-and-work/WCMS_741706/lang--en/index.htm

Jahan, Momtaz. (2012. "Recruitment and Selection Process in Bangladesh Civil Service: A Critical Overview." Public Policy and Administration Research, 2(5). https://www.iiste.org/Journals/index.php/PPAR/article/view/2661

Jalil, Abdul Md. 2012. "Disabled People's Access to Public Sector Employment in Bangladesh: Why So Little Changes?" OIDA International Journal of Sustainable Development. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2035613

Leonard Cheshire. 2016. "Understanding Data Systems for Employment and Social Protection of Persons with Disabilities in Kenya and Bangladesh." International Labour Organization, Geneva, Switzerland. https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---ifp_skills/documents/publication/wcms_732018.pdf.

Mizunoya & Mitra. "Is there a Disability Gap in Employment Rates in Developing Countries?" https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2127568.

Sen, Binayak and Mainul Hoque. 2017. "Unpacking Disability-Extreme Poverty Links in Bangladesh through Household Income and Expenditure Survey: A Quantitative Exercise. Chronic Poverty Advisory's Network. ODI, London. https://www.odi.org/publications/11066-unpacking-disability-extreme-poverty-links-bangladesh-through-household-income-and-expenditure.

UN Convention on the Rights of Persons with Disabilities. https://www.un.org/ development/desa/disabilities/
convention-on-the-rights-of-persons-with-disabilities.html.

UN. 2018. "UN Flagship Report on Disability and Development 2018: Realization of the Sustainable Development Goals by, for and with Persons with Disabilities." United Nations, New York. https://www.un.org/development/desa/disabilities/wp-content/uploads/sites/15/2019/07/disability-report-chapter2.pdf.

UNICEF. 2014. "Situation Analysis on Children with Disabilities in Bangladesh." UNICEF, New York. https://www.unicef.org/bangladesh/ media/2046/file/SA-disablity%20report.pdf.

United Nations Office for the High Commissioner on Human Rights. Status of Ratifications Interactive Dashboard, https://indicators.ohchr.org/.

World Bank. 2008. "Disability and Children at Risk Project Appraisal Document." World Bank, Washington, DC. http://documents1.worldbank.org/curated/en/485601468003560874.

World Bank. 2017. "Bangladesh Jobs Diagnostic." World Bank, Washington, DC. https://openknowledge.worldbank.org/ handle/10986/28498.

World Bank. 2018. "Disability Inclusion and Accountability Framework." World Bank, Washington, DC. http://documents1.worldbank.org/curated/en/437451528442789278/pdf/126977-WP-PUBLIC-DisabilityInclusionAccountabilitydigital.pdf.

World Bank. 2019. "Bangladesh Poverty Assessment: Facing Old and New Frontiers in Poverty Alleviation." World Bank, Washington, DC. http://documents1.worldbank.org/curated/en/793121572582830383/pdf/Bangladesh-Poverty-Assessment-Facing-Old-and-New-Frontiers-in-Poverty-Reduction.pdf.

World Bank. 2020. "Background Report on Inclusive Employment of Persons with Disabilities in Bangladesh." World Bank, Washington, DC.

World Bank. Forthcoming. "Diagnosis of the Situation of People with Disabilities in Romania." World Bank, Washington, DC.