



International
Labour
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UNPRPD MPTF
Partnership on the Rights of Persons with Disabilities



GUIDELINES ON REASONABLE ACCOMMODATION FOR PERSONS WITH DISABILITIES

User Guide for Technical and Vocational Education and Training Institutions and the Workplaces

Introduction

The International Labour Organization (ILO) and the United Nations Educational, Scientific and Cultural Organization (UNESCO) are jointly implementing the United Nations Partnership on the Rights of Persons with Disabilities (UNPRPD) Multi-Partner Trust Fund (MPTF Multi-country project). The UNPRPD Multi-country project on “Ending Stigma and Discrimination, Breaking the Cycle of Poverty and Marginalization of Persons with disabilities (2021-2023)” is being implemented in Mozambique, Namibia, Tanzania, and Zimbabwe.

The main objective of the UNPRPD Multi-country project is to support the respective Member States to accelerate the implementation of the Convention on the Rights of Persons with Disabilities (CRPD) through developing tools that will inform the design of measures to address stigma and discrimination practices towards persons with disabilities in the Technical and Vocational Education and Training (TVET) institutions and among the employers in the work place, thereby laying grounds for action to fight such a widespread phenomenon. The project specifically contributes to the implementation of the following CRPD Articles by respective countries:

- Article 6 (Women with disabilities)
- Article 8 (Awareness Raising)
- Article 24 (Education)
- Article 27 (Work & Employment)

Thus, within the above framework, the ILO Regional Office and the UNESCO Regional Office for Southern Africa have conducted qualitative research using Key Informant Interviews (KII) and Focus Group Discussions (FGDs) to support the development of a draft framework on Guidelines on the provision of Reasonable Accommodation for persons with disabilities in Technical and Vocational Education and Training (TVET) institutions and the workplace. The findings to this research were further validated at a participatory validation workshop to which further input was made in the form of recommendations that then led to the development of these guidelines.

Who the Guidelines are for?

Whilst reasonable accommodation applies to all designated groups, these guidelines focus on persons with disabilities who are learners/apprentices and workers within Technical Vocational and Education Institutions, as well as workplaces. These are meant for use by TVET institutions and employers. They should enable a quick guidance to the user as to what is expected of them when responding to the needs of persons with disabilities. They were designed and developed on the basis of the qualitative research findings that was conducted and to which recommendations were put forward when the findings were validated by participants to a regional validation workshop prior to their final development. They are thus evidenced based and guided by the real-life experiences of learners and workers with disabilities in selected TVET institutions and work places in Tanzania.

Why are the Guidelines Important ?

These guidelines were developed through some qualitative research and validation of the findings by various stakeholders. Our key findings to the qualitative research conducted show

that TVET institutions, employers as well as the persons with disability lack the know-how, the knowledge and skills on how best provisions can be made within the learning and work environments to allow persons with disabilities to perform to their maximum potential. The research findings further showed that learners and workers with disabilities were experiencing stigma and discrimination which led to deprivation of their rights in accessing what other students and workers were accessing. Thus, the guidelines will provide a pathway as to what TVETS institutions and employers should do right from the onset on enrolling trainees/learners/students into TVET institutions to recruiting persons with disabilities as workers within the same institutions. These guidelines as outlined in this user guide will therefore act as guide to:

- ✓ Implementation of reasonable accommodation measures which will uphold, support and promote the rights of persons with disabilities;
- ✓ support the legislative environment by encouraging the promulgation of legislation where there is none, and to accelerate consistent implementation of reasonable accommodation measures where legislation already exists;
- ✓ guide the application of reasonable accommodation for persons with long-term impairments and persons with temporary disabilities;
- ✓ provide a mechanism for integrated and multidisciplinary coordination of reasonable accommodation;
- ✓ combat unfair discrimination and secondary victimisation of persons with disabilities;
- ✓ provide for the development of procedures and norms and minimum standards for the issuing of assistive devices, reasonable accommodation measures, support services;
- ✓ support the provision of equitable budgeting for the provision of reasonable accommodation support to persons with disabilities; and
- ✓ provide for the specific roles and responsibilities of relevant organs of state and sector-based stakeholders to improve the application of reasonable accommodation measures AND
- ✓ provide for matters connected therewith

Summary Guidelines in the Provision of Reasonable Accommodation for the Learners and Apprentices in TVET Institutions

The Reasonable Accommodation Issues	The adjustment and Implementation Process Required
1. Enrolment	Make formal entry requirements more flexible and inclusive by recognising previous learning skills and assessments that facilitate access to formal education requirements - Make sure the place is accessible for interviews - use of sign language or appropriate mode of communication - allocate reasonable time to achieve the require competence level - provide vocational orientation - and counselling, - Provide relevant and effective instruments and tools to address gender and disability discrimination practices. - Raise awareness with the other learners to address misconceptions.

2. Curriculum, Teaching and Learning	- adapt the curricula and accompanying teaching and training material to the needs of learners with disabilities - Create linkages with the employers for skills training relevant to the work place - Arrange for placements with employers - Raise awareness with employers - Training should take a learner centred approach - give attention to slow learners. - Teaching and instruction methods should be inclusive and appropriate - Ensure the training classrooms are accessible - Use appropriate teaching instructions and tools - Identify a sign language interpreter
3. Exit and Transition Support	Support the transition from education to employment by designing an internship programme that - provides an opportunity for learners with disabilities to showcase their skills and talents - Provide core skills for employability and job search - Create access to the labour market information and networks, - Create access to inclusive career guidance and counselling services - Provide resources for employment and business startups - Follow up and provide support to the learner
4. Monitoring	- Keep track of the students that are launched into the world of work - Provide continued support to the employer and the employee with disabilities - Use some of the students now employees as examples of success stories
5. Creation of a Disability Desk	- Create a disability affairs desk that will provide psychosocial support to the learners with disability - Use the disability desk to raise awareness to other learners and general public to address misconceptions - Use the disability desk to advocate for the rights of learners with disabilities

Summary Guidelines in the Provision of Reasonable Accommodation for the TVET Trainer/Worker

Reasonable Accommodation Issue	Implementation Process
1. Advertising and Creating Interest for a Job to a worker with disability	- If using a website, there is need to audit the web page or advert for accessibility by for example ensuring that text descriptions of the job are readable to those with eye site challenges. (Accessible digital format, large print or Braille) - letting the readers know that the employer is prepared to offer reasonable accommodation to persons with disabilities who may have interest in applying for the job - Pre-testing and selection criteria should focus on the skills, knowledge and abilities regarded as essential to the in-company training. - Physical accessibility and accommodation at the interview location needs to be ensured - seek further assistance from the local organisations of disabled people
2. Recruitment and Selection of the workers	- Make the recruitment process an interactive one by contacting all the interviewees and asking them on any accommodations they may need at the interview. It may include travel, language interpretation and access to the building. The employer will then allow a lot of time for feedback and adjustment.
3. Building a bridge between learners, skills and employment: Talent Building	- Ensure work-based learning, particularly apprenticeships, as an effective way of transferring technical skills and preparing especially young persons for the labour market
4. Onboarding	- Help the new TVET employee understand their new position and job requirements - Engage all heads of departments in the process of work environment acclimatization and development of job descriptions - Engage the new Trainer/worker in deciding the reasonable accommodation needs they have - Assign carefully selected staff mentors to accompany the recruits, conduct company tours, building orientations so as to identify any adjustments that may be needed and allow a good acquaintance and adjustment to the new work environment

5. Retention	- Establish a disability affairs desk to address and attend to disability issues - Offer psychosocial support through a qualified counsellor when needed - Create Flexible working hours and locations that are accommodative - Conduct adjustments to workspaces, including the provision of private offices - Ergonomic or assistive furniture and devices - Grant permission to bring service animals to work
6. Empowerment through Skills Development	- Create a culture of feedback that allows the TVET workers to speak freely and propose areas of skills improvement and development - Provide training opportunities which ensure inclusive language to all staff in for example modular training in Sign Language so that those with hearing impairment feel more welcome
7. Offboarding	- Conduct an Exit Interview. This is the process of easing a departing employee's transition out of the company. It is the process of disengaging an employee from their position within a company, a practice used both for people who choose to leave, and for those who are laid off. It's meant to end the relationship between employee and employer on a positive note
8. Separation and advocacy	- Turn former employees with disabilities into advocates for the TVET employer brand.

Summary Checklist in the Successful Provision of Reasonable Accommodation Within TEVT Institutions

The Strategic Guiding Reasonable Accommodation Issue	The Provision Process and Modalities
1. Policy and Planning	✓ Do your National Development Response Plans include reference to disability and social inclusion? How does the investment align with this reference and to Zimbabwe's focus on those more likely to experience vulnerability, including people with disabilities? ✓ Do Performance Frameworks and reporting against these frameworks use disability and sex disaggregated data? ✓ Has expertise in disability inclusion been sought to inform the budget concept and design? This should include consulting people with disabilities and their representative organisations from the local context. ✓ Has disability inclusion been factored into the investment concept and/or design from the outset, particularly for investments in sectors identified as key opportunities in Development for all such as in the Ministry of labour and social welfare and the Ministry of Higher and Tertiary Education strategic framework? It should be noted that it is cheaper to incorporate disability inclusion at the outset rather than retrospectively once a development investment has already been established. ✓ Has an analysis been undertaken to inform the investment concept and/or design, which identifies (a) relevant existing issues for people with disabilities, (b) potential barriers for people with disabilities in accessing and benefitting from the planned investment and (c) solutions to the identified issues? ✓ Have the particular needs and interests of the following been factored in to the investment design, recognizing the following groups face particular barriers and marginalization, as well as different needs: ✓ people with a range of impairment types and severity, including those with psychosocial and intellectual impairments ✓ women and girls with disabilities ✓ children and older people with disabilities. ✓ Have people with diverse disabilities and their representative organisations (including disabled people's organisations, and local community groups) been consulted and involved in the design of the investment, in line with the guiding principle of 'nothing about us without us'? ✓ Has approximately 3 to 5 per cent of the budget been set aside to cover potential costs associated with ensuring people with disabilities and their representative organisations can (a) participate in accessible consultations and provide technical inputs into design, implementation and monitoring and evaluation, and (b) provide technical benefit from the investment, for example through providing reasonable accommodation, such as sign language interpreters and accessible transport?

	✓ Does the investment design ensure any construction is accessible in line with the Accessibility Design Guide? ✓ Has the design considered the impact (intended and unintended) that the investment could have on people with disabilities and included strategies for avoiding or minimising negative impacts on people with disabilities? ✓ Have issues and sufficient controls been identified in the risk and safeguards screening tool which reflect the heightened risks faced by people with disabilities - particularly for people with disabilities who also identify as: children, women and girls, indigenous, ethnic or religious minority or at risk of resettlement? ✓ Are there disability-inclusion deliverables clearly outlined in the Statement of Requirement or agreement, and financed (recommended at 3 to 5 percent of the budget)? Do they include plans on: ✓ how people with disabilities will be included in the development of the investment concept and/or investment design ✓ what measures will be taken to ensure people with disabilities will be able to participate in and benefit from the given investment ✓ what specific targets will be used to monitor progress towards disability-inclusion and how will data be disaggregated by disability status ✓ hiring people with disabilities as implementers, evaluators and researchers (where possible)?
2. Implementation and Performance Management	✓ Has baseline data (quantitative and qualitative) been established from the outset to measure progress on disability-inclusion? ✓ Are both quantitative and qualitative indicators used to track progress on disability-inclusive development outcomes within the M&E framework? ✓ Is disability disaggregated data being collected and analysed using the Washington Group short set of questions? Is this data also disaggregated by sex and age to assess the impacts on women, men, girls, and boys with disabilities? ✓ Are there indicators for disability-inclusion in place for monitoring and evaluation (with sufficient resources allocated)? ✓ Have systems been established (from the outset) to capture disability information for Investment Monitoring Reports particularly on the extent to which: (a) The investment actively involves people with disabilities and/or disabled people's organisations in planning, implementation and monitoring and evaluation. (b) The investment identifies and addresses barriers to inclusion and opportunities for participation for people with disabilities to enable them to benefit equally from the aid investment. ✓ Is the implementing partner's performance on addressing disability inclusion being monitored as part of the monitoring and evaluation framework?

	✓ Have people with disability expertise (including people with disabilities and/or their representative organisations) participated in the development of the M&E framework and actively engaged in monitoring and evaluation activities
3. Design and Procurement	Construction of Buildings When constructing buildings, ensure that: ✓ Ramps or an elevator is available if there are steps or multiple levels ✓ Walkways are paved, free of protrusions and potholes and at least 112 centimetres wide ✓ Doors are at least 81 centimetres wide ✓ Automatic doors or buttons to automatically open doors ✓ Accessible parking spaces ✓ Good-quality lighting ✓ Emergency flashing lights ✓ Visual representation of audio announcements ✓ Qualified local sign language interpreter ✓ Signs in good contrast colours ✓ Signs include braille and text font size in 100 points On WASH Facilities Toilets/Latrines ✓ Bars installed near the toilet ✓ Five foot or 1.5 meter turning radius ✓ Sink at a reachable height for wheelchair users ✓ Automatic water faucet ✓ Strong lighting With Drinking Water ✓ Water pump or well is placed at the ground level ✓ Well is at a height that people in wheelchairs and people with short stature can reach ✓ Ramps are at least 112 centimetres wide if walking uphill with uneven terrain is required ✓ There is seating by the well or water pump ✓ There is strong lighting In Workplaces ✓ Qualified local sign language interpreter are available ✓ Computers and teleconference tools with accessibility features (i.e., text to speech conversion, zoom/magnifier, voice control, subtitles/captioning, and Smart Invert ✓ There are adjustable desks ✓ Ramp or an elevator is available there are steps or multiple levels ✓ Walkways are paved, free of protrusions and potholes, and at least 112 centimetres wide ✓ Doors are at least 32 inches or 81 centimetres wide

- ✓ Automatic doors or buttons automatically open
- ✓ There is video relay service
- ✓ The phones have subtitles/captioning

For Training/Conferences/ Lecture/Teaching Rooms

- ✓ They are free of background noise
- ✓ Microphones are available
- ✓ Qualified local sign language interpreter
- ✓ Subtitles/real-time captioning are available
- ✓ Materials available in alternative format – large text (18 points), braille, and easy to read
- ✓ Reimburse option for taxi rides if public transportation is not accessible
- ✓ Lecture rooms are located on ground level or elevator/ramp access
- ✓ There is high-quality lighting
- ✓ 15-minute breaks included during lectures

Disclaimer

This document is based on evidence-based research with information solicited from various sources that include websites, representatives from Technical, Vocational, Educational and Training Institutions, Private Sector Companies, Government Departments and Parastatals, country policy documents, Persons with disabilities, disability experts, education experts and organizations of persons with disabilities whom we believe provided us with reliable and accurate information at the time of research and publication. The content provided is for informational and professional purposes only but should not be construed as a definitive guide. This opinion is therefore given on the basis of the information provided by the client is accurate and current. Should any other information become available before implementation of this opinion be provided as soon as possible to the consultant as this may affect the opinion provided. Distinctive Consultancy Services shall not be held liable if such information is not made available by the client.

