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Sector Skills Strategy

▶ **Study to assess the inclusion of youth with disabilities in TVET and among selected companies in the Ghanaian Tourism and Hospitality Sector**

Skill-up ghana project



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► List of Abbreviations

COTVET	Council for Technical and Vocational Education and Training
GDP	Gross Domestic Product
GES	Ghana Education Service
GFD	Ghana Federation of Disability Organization
GSS	Ghana Statistical Service
GTA	Ghana Tourism Authority
IDI	In-Depth Interviews
KII	Key Informant Interviews
ILO	International Labour Organization
MDAs	Ministries, Departments and Agencies
NEP	National Employment Policy
NVTI	National Vocational Training Institute
TV	Television
TVET	Technical Vocational Education and Training
UN	United Nations

► Executive Summary

An assessment study of the inclusion of persons with disabilities in the Technical Vocation Education and Training system and in selected companies in the Ghanaian Tourism and Hospitality industry sector was undertaken as part of ILO's project "Skill-Up - Upgrading Skills for a Changing World of Work", funded by the Norwegian Ministry of Foreign Affairs. The overall objectives of this assessment were to identify, through surveys with staff from training institutions and companies, and including with persons with disabilities, key challenges and barriers limiting disability inclusion, opportunities to address these challenges and inclusive approaches in practice. The results of this assessment provide evidence and recommendations to support the formulation and implementation of policies to facilitate disability-inclusiveness in the TVET system and in the industry sector.

In 2006, the country enacted the Persons of Disability Act (715, 2006) and, in 2012, ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The Persons of Disability Act (715, 2006), among other provisions, introduces the right of persons with disabilities to participate in social, political, economic and creative or recreational activities. It also provides for their non-discrimination as prospective or actual employees and, on its section 10, introduces the provision of an annual tax rebate for those employing persons with disabilities.

This assessment study found deficits in the supply of TVET and in the labour demand for persons with disabilities. There were no students with disabilities enrolled in the Tourism and Hospitality training programs offered by the interviewed institutions. Non-inclusive facilities and the lack of accessible forms of instructional materials are the major contributors to this shortfall. There is commitment from the government to address these challenges, but the lack of financial resources is a major impediment.

On the demand side, the lack of inclusive human resource policies, especially in non-international companies, poses significant challenges to the opportunities of employment for persons with disabilities in the sector. Cultural and religious barriers also contribute to the absence of disability-inclusiveness at the workplace, though this does not apply to international companies, since they follow global policy standards that benefit the participation of persons with disabilities at work on an equal basis to others. At the national level, the Persons of Disability Act (715, 2006), in force for fourteen years, has not been enforced, and this negatively affects the rights of persons with disabilities, and especially to education and decent work.

Provisions to support overcoming these challenges should take into account the central role of the National Council of Persons with Disabilities (NCPERSONS WITH DISABILTIES). The Council must strengthen its monitoring, evaluation, coordinating and regulatory oversight, defined under section 42 of the Persons of Disability Act (715, 2006), by working closely with Ministries, Departments and Agencies (MDAs), and specifically the Ghana Tourism Authority (GTA), the Ghana Education Service (GES) and the Tourism and Hospitality Sector Skills Body ensure compliance with the existing legislation.

▶ 1. Introduction

Persons with disabilities are one of the largest vulnerable groups in Ghana, and accounted for an estimated 3.0 percent of Ghana's 25 million population in 2011.¹ The participation of persons with disabilities in employment is central to maintain decent standards of living for themselves and for their families, and an important opportunity for them to fully participate in society.

According to the UN,² "work is a defining feature of human existence and in many societies the ability to work is viewed as one of the most important ways in which people can make their individual contributions to their communities". However, despite existing laws at the national and international levels, and the activities of organisations and associations that support disability-inclusiveness, persons with disabilities continue to face challenges in the access to training and employment opportunities. The absence of strong policies and of data to support their development and implementation, especially in developing countries, contributes to increase their vulnerability.

The youth unemployment rate in Ghana was estimated at 9.1 percent in 2017.³ Despite the lack of data, unemployment among youth with disabilities may be higher, since they face unequal opportunities. Their low participation in education can also lead to unemployment. Data from the 2010 census¹ shows that an estimated 40.1 percent of the total persons with disabilities never attended school, and the difference between males and females was significant, corresponding respectively to 47.9 percent and 31.5 percent. In this same year, only 2.0 percent of the total persons with disabilities completed Technical Vocational Education and Training (TVET), with a slightly difference between males and females, corresponding to 1.7 percent and 2.3 percent respectively.

TVET is a vehicle to increase the employability of persons with disabilities and facilitate their access to decent work. In 2015, the Government of Ghana approved a National Employment Policy⁴ (NEP). Social inclusion and eliminating all forms of discrimination in the labour market are among its strategic priorities. The NEP also recognizes the need to improve training and skills development to increase the employability of persons with disabilities.

ILO's Skill-Up (Upgrading skills for the changing world of work) Ghana project, funded by the Ministry of Foreign Affairs of the Government of Norway, carried out a study to assess the inclusion of persons with disabilities in the Technical Vocation Education and Training system and in selected companies in the Ghanaian Tourism and Hospitality industry sector. The main objectives of the study were to identify access barriers; determine the appropriateness of work and study environments; assess the level of knowledge/compliance with legislations and policies for persons with disabilities and the suitability of training programmes offered by TVET training institutions. It also focused on the identification of good practices and provided recommendations to improve disability-inclusiveness.

1 Disability in Ghana, Ghana Statistical Service, 2014: <http://tiny.cc/1uaynz>

2 UN Toolkit on Disability for Africa: <http://tiny.cc/k67xnz>

3 ILO Stat Database: <https://ilostat.ilo.org/data/>

4 https://www.ilo.org/africa/about-us/offices/abuja/WCMS_373458/lang--en/index.htm

▶ 2. Context

Globalization contributed to the expansion of tourism and its increasing importance in economic development. In Africa, its full potential is yet to be exploited, since the continent receives less than 5% of the total global tourism.⁵ There is also a need to facilitate the participation of vulnerable groups, and especially persons with disabilities, in the sector. Agendas that prioritize inclusion and address barriers to their participation in training can help to increase their access to employment opportunities.

In Ghana, tourism and hospitality are key drivers of economic growth, contributing to generate foreign exchange earnings, to create jobs and wealth, and stimulate other sectors of the economy. In 2017, tourism contributed to 6.2 percent of the GDP and counted with over 1.3 million international arrivals (Oxford Business Group, 2019).

Ghana's tourism and hospitality sector comprises, among others players, hotels, restaurants, arts, recreation and entertainment, rental agencies and tour operators. The sector faces some key challenges, including high labour turnover rates, poor domestic air transport and low skills among its labour force. However, the country's rich cultural environment, its political stability and the receptivity of its population are major opportunities to strengthening its development.

Disability, according to the WHO, is a complex phenomenon and not just a health problem. It covers impairments, activity limitations, and participation restrictions. The organisation defines an impairment as a problem in body function or structure; an activity limitation as a difficulty encountered by an individual in executing a task or action; and a participation restriction is a problem experienced by an individual in involvement in life situations.⁶

Many countries, including Ghana, have committed to breaking the boundaries that discriminate against disability at every level in our society. However, despite existing laws at the national and international levels, and the activities of organisations and associations that support disability-inclusiveness, persons with disabilities continue to face challenges in access to training and employment opportunities. In tourism and hospitality, the lack opportunities for persons with disabilities to enrol in training leads to reduced opportunities of employment in the sector.

Employment is essential for poverty reduction, including among persons with disabilities. It increases self-sufficiency, social connectedness and creates a sense of self-worth and dignity for individuals. A vital step towards the rehabilitation and empowerment of persons with disabilities, it provides a sense of belonging and independence, and increases their social inclusion and overall well-being (Berg, 2008).

Persons with disabilities can perform most jobs in an enabling environment and with support services, and can be as productive as persons without disabilities, but there are limited employment opportunities for them. At the global level, persons with disabilities have lower employment rates than persons without disabilities, and the few employed work fewer hours and in lower-paid or lower-skilled positions (DfID, 2000). In developing countries, it is estimated that between 80% and 90% of the population with disabilities and at working age are unemployed.⁷

In Ghana, persons with disabilities face many challenges in securing jobs and those employed are often engaged in low quality jobs. Among the factors contributing to this situation there are concerns of employers about providing accessibility in the workplace and advertising inclusive job vacancies, and prejudices and misconceptions about disabilities. In addition to these, the lack of appropriate education and training makes it difficult for persons with disabilities to take advantage of policies and programmes that support increasing their participation in the labour market. Persons with disabilities simply lack the necessary knowledge, skills, and abilities, needed for the available jobs.

5 Tourism sector in Africa, UNCTAD, 2017: <https://unctad.org/en/pages/PressRelease.aspx?OriginalVersionID=415>

6 World Health Organisation: <https://www.who.int/topics/disabilities/en/> accessed on May 25th, 2020.

7 UN Department of Economic and Social Affairs Disability: <http://tiny.cc/ge4opz> accessed on May 25th, 2020.

Over the years, government's policies prioritize skills development for youth, and including youth with disabilities, as a means of boosting employability and contributing to economic development. Increasing access to technical vocational education and training and enacting the Persons of Disability Act (715, 2006), are other supporting initiatives for persons with disabilities in Ghana (King and Palmer, 2007).

In particular, the emphasis placed on increasing access to vocational education and training for persons with disabilities faces many obstacles. Some of them equally apply to persons without disabilities, such as outdated contents of training programmes and a limited number of TVET schools. However, the lack of disability friendly training facilities and materials was detected in a 2014 study (World Bank, 2014).

In this context, ILO's Skill-Up (Upgrading skills for the changing world of work) Ghana project, funded by the Ministry of Foreign Affairs of the Government of Norway, carried out this study to assess the inclusion of persons with disabilities in the Technical Vocation Education and Training system and in selected companies in the Ghanaian Tourism and Hospitality industry sector.

▶ 3. Methodology

The methodology of this study combined a desk review of relevant documents on disability inclusion with qualitative methods of data collection involving in-depth interviews (IDI), key informant interviews (KII) and observation. In-depth interviews aimed at providing an understanding of individual concerns and experiences with disability inclusion. Key informant interviews aimed at understanding institutional cultures and systems from the perspective of their underlying motivations and attitudes towards disabilities inclusion. Interviews were complemented with observations to broaden the understanding of the responses and better inform the study findings and recommendations.

A purposive sampling approach was adopted in the identification of participants of the study. The structure of the International Standard Industrial Classification of All Economic Activities, ISIC, Rev.48, guided the selection of types of establishments, in addition to company size. The sample involved training providers in the Tourism and Hospitality sector, bars and restaurants, car rental companies and recreational facilities and hotels from different star and size groups. The National Council of Persons with Disabilities was also included among the participants. The list of participants can be found in the annexes.

TVET in Ghana comprises a formal and an informal system. The formal TVET system provides training at the pre-tertiary and the tertiary levels. The pre-tertiary level involves senior technical high schools and second-cycle training institutions, while the tertiary comprises universities and technical universities, also known as polytechnics. One tertiary level public institution and four pre-tertiary training institutions, both in the public and private sectors, participated in the study.

Interviews were conducted with a total of 62 participants from the above sample. The selection criteria for participants of industry and training establishments, in addition to students, involved the occupational level. Staff from management, human resources and operations, directors and instructors participated in the interviews.

The research was descriptive and aimed at assessing the current inclusion of people with disabilities in the TVET system and in selected companies in the tourism and hospitality sector, while identifying barriers and good practices in effective disability inclusion. It sought to describe the social and employment situation of persons with disabilities and their access to training and employment in the sector.

Two types of open-ended questionnaires were prepared to guide the interviews: one for training institutions and another for industry establishments. Pre-interviews aimed at testing the questionnaires were conducted with a few participants. Based on the results of this test, ethical concerns were identified, the questionnaires were redesigned and mitigation strategies for the ultimate data collection were defined.

Three teams of one lead interviewer and one assistant proceeded with data collection under the supervision of the author of the study and a research assistant. Data was collected using voice recorders and written notes and was later documented for analyses in line with the research objectives of the study.

3.1. Research Limitations and Opportunities

Purpose sampling is subjected to limitations of the own judgment of the researcher when selecting members of a population to participate in the study. However, it can be effective when applied to a small number of participants and with specific objectives such as in this study. The extensively narrative presentation captures in details the opinions and experiences of the study participants.

Due to the emergence of the COVID-19 pandemic, the study could not conduct a more in-depth analysis of the policy, institutional and legal issues underpinning its findings. These included emerging inter-ministerial/agency collaboration and responsibilities in the implementation of laws and policies to support persons with disabilities.

▶ 4. Study Findings

The study sampled five key institutions that provide training for the Tourism and Hospitality sector. Training offered by these institutions range from three months certificates to four-year degree programmes. Among the training providers, only one institution offers training at the tertiary level, a 4-year BSC Tourism programme. All other providers offer training at the secondary level, ranging from 6 months to 3 years proficiency and certificate programmes in cookery, front desk management, housekeeping, food and beverages, tour guiding, events, conferencing and waitering. The 6 month certificate programs respond to demands for upgrading the skills of workers in the sector.

Twenty-five (25) industry players were sampled for the study, comprising hotels, restaurants and tour companies. The restaurants comprised high end and small business establishments known as 'chop bars'. In addition to these and, as mentioned in the methodology section, there were participants from recreational facilities. The list of all participants can be found in the annexes. The findings, following the qualitative and descriptive nature of this study, are presented in this section.

4.1. Identifying access barriers to persons with disabilities

4.1.1 Admission policies and practices in training institutions

The results of the study indicate that admission policies in training institutions did not make provisions for the inclusion of persons with disabilities. The application process and admission requirements were the same as those for persons without disabilities. Despite the lack of provisions for disabilities inclusion, the inclusion of specific vulnerable groups is supported at the policy level. The study found specific requirements to encourage the enrolment of females at tertiary education.

Ghana Education Service (GES) is a government agency under the Ministry of Education that oversees the implementation of pre-tertiary educational policies and programs. The agency provides a service to support requests for placement at pre-tertiary (secondary) schools through its Computerized School Selection and Placement System (CSSPS), which is available over the internet. Students placed at pre-tertiary schools via GES services benefit from free education. The study found that the CSSPS automatically provides reduced entry requirements to girls and persons with disabilities.

A public pre-tertiary school that participated in this study and is overseen by GES noted that its published admission notices are not accessible to persons with visual disabilities. It was also noted that this lack of accessibility has never been a challenge, and the school always operates at its full capacity.

The other three pre-tertiary institutions that participated in the study do not have policies to support disabilities inclusion. They informed that they do not have facilities to accommodate students with disabilities due to their lack of funding. Among these institutions, one was closed for over five years, due to financial reasons, and had just enrolled new students at the beginning of 2020. Admission notices for these three schools use the internet and print media channels and are not accessible for persons with visual disabilities.

The study found that, in the view of all training institutions that participated in this research, the lack of facilities for disabilities inclusion is a reason to not implement policies that support the enrolment of persons with disabilities into training programmes. This poses challenge for persons with disabilities to work in the Tourism and Hospitality sector, since they are not able to acquire the required skills.

4.1.2 Industry entry

The results of this study point to a very limited supply of skilled persons with disabilities in the tourism and hospitality industry. This was confirmed in interviews with management staff at hotels, restaurants

and recreation facilities. Considering the lack of access to persons with disabilities to training, according to the results of the interview with training institutions, this was expected.

The study observed that four and five-star hotels and high-level restaurants advertised their job vacancies on websites, printed media and company's internal communication platforms (notice boards, staff information circulars and emails). The choice of the media did not take into account disabilities inclusion and advertised jobs did not encourage persons with disabilities to apply for them.

In small-size companies, comprising traditional restaurants, one to three-star hotels, car rental companies and recreation facilities, job vacancies were normally not advertised. These companies kept unsolicited applications from their former interns on file, and consulted them when they needed to hire qualified personnel. This recruiting practice resulted from partnerships with training institutions to provide on-the-job experience to school graduates.

Hotels have selective hiring standards due to the customer services nature of their businesses. According to hotels of 3-stars or less, the competitive nature of their industry requires maintaining high standards of service provision and this compels them to employ persons that are 'presentable' in appearance, and without any form of visible disability. This hiring practice is mainly applied to front desk receptionists, restaurant and conference attendants, security guards and other jobs that require direct contact with clients. It is viewed as a way of securing their market position, since they estimate that having these jobs occupied by persons with disabilities could drive their customers away.

Despite of this general hiring practice, they were of the opinion that qualified persons with disabilities could be employed in jobs that do not require facing customers, and especially in the housekeeping, laundry, kitchen, finance and administration areas. A cleaner with hearing impairment is employed at a two stars hotel that participated in this study.

In the four and five-star hotels that participated in this study, persons with disabilities can be part of their front line staff, provided they are competent. This hiring practice is informed by their policies, which follow international standards. One of the hotels employs (5) five persons with physical and psychosocial disabilities, comprising 1.8 percent of their total 282 staff. The majority of the staff comprising persons with disabilities works in kitchen services, but one of them is a manager who progressively attained this position after being hired as a waiter.

The study found four newly recruited persons with disabilities at another hotel in the category of four to five stars. This was the first time that this hotel had hired persons with disabilities, following their human resources policy that conforms to international standards. At the time of the study, the newly recruited were participating in training.

The third hotel in the category of four to five stars did not have persons with disabilities among their staff. However, they mentioned a former staff with disability worked at the hotel for over ten years, and retired in 2018. This establishment also complies with international standards and their human resources policy supports disability inclusion. However, they have not been able to hire persons with disabilities because they failure to apply for their job vacancies.

4.1.2.1 Human resource policies

As previously mentioned, hotels from 4 and 5 stars follow standards of their international chains, including policy guidelines that emphasize non-discrimination in human resource practices, such as job postings, recruitment, promotions, training, emoluments and assignments. Additionally, they provide facilities for persons with disabilities to perform their functions. The study found that these include transportation from/to home to facilitate their mobility.

The results of this study show that hotels within the one to three-star categories do not have human resource policies that support the inclusion of persons with disabilities. Their facilities lack accessibility features, which are provided only for their customers and temporarily, such as portable ramps to enable access to events.

The study also found that the main reasons for the absence of human resource policies to support disabilities inclusion were that (i) one to three-star hotels are owned by individual entrepreneurs interested in maximising profit to recover their investments within the shortest possible time and (ii) religion and culture impact the adoption of disability inclusive employer practices.

More specifically, disabilities inclusion is viewed as an act of charity that deviates from the profit motive. In addition to this, in most Ghanaian cultures, persons with disabilities are seen as outcasts. Many educated Ghanaians still view disabilities as a disease, punishment or curse from God or the gods. Traditional religions and Christianity reinforce these stereotypes (Ocran, 2017).

It was also found that these limitations do not apply to all of the one to three stars hotels that participated in this study. Among them, one hotel has a corporate social responsibility strategy and supports a foundation that provides scholarships for vulnerable groups, including orphans and persons with disabilities. This foundation currently supports three persons with disabilities enrolled at undergraduate studies at the University of Ghana.

4.2. Suitability of the work/study environment

4.2.1 Workplace facilities

The Persons with Disability Act, 2006 (Act 715) requires employers to provide appropriate facilities to support the work of persons with disabilities and this is enforced by the Ghana Tourism Authority. However, not all the establishments that participated in this study account for accessibility in their architecture.

The existence of an inclusive physical working environment is essential to ensure that persons with disabilities can effectively accomplish their work. The study observed that facilities in four and five-star hotels were accessible to persons with disabilities, and especially those with physical disabilities, since there are ramped access and escalators to facilitate their mobility.

Management confirmed the lack of accessibility at the hotels in the category of one to three stars. However, they were not optimistic about the possibility of upgrading their facilities since apart from being expensive, the architectural design did not provide for accessibility, making it impracticable to integrate elements such as ramps, escalators and elevators. This brings into question the compliance with regulatory requirements during the process to obtain a construction permit and during inspections of the facilities.

4.2.2 School environment

A learning environment where persons with disabilities feel comfortable is a pre-requisite to ensure disabilities inclusion. This study sought to ascertain the existence of learning environments that posed no barriers to persons with disabilities, and that encouraged them to enrol and stay in school.

With the exception of one training provider which has their facilities at single storey buildings, all other training institutions are housed in two and three storeys buildings with no provision for the accessibility of persons with disabilities. Ramped access for persons using wheel chairs is not available in all of the institutions sampled for the study.

The practical part of the training programmes takes place at hotels and restaurants where students undertake internships to gain experience. At school cookery or catering workshops have equipment such as stoves, baking ovens, refrigerators and chopping tables accessible to most students, but the average four feet length of the working board on which all the equipment are installed might prevent students with a shortened trunk dysplasia of reaching them. This notwithstanding, the absence of students with disabilities at catering and cookery departments of all schools did not provide the researchers with an opportunity to have a fair assessment of inclusiveness of the facilities. The lack of accessibility to this equipment is based on the perceptions of students and staff without disabilities.

4.3. Level of knowledge/compliance with legislation and policies for persons with disabilities

Persons with disabilities account for an estimated 3 percent of Ghana's population of 25 million (GSS 2012; Picton 2011). Traditional religious and cultural beliefs lead to the misinterpretations of disabilities and the creation of stereotypes (Kassah 2008). In this context, it is equally difficult for persons with and without disabilities to be open-minded and aware of the importance of acquiring knowledge and better understand disabilities. Persons with disabilities, therefore, continue to experience social stigma, social exclusion and discrimination.

In Ghana, the most significant contribution to a continuous marginalisation of persons with disability is the weakness of legal provisions and regulatory structures that protect them. The laws have been designed to challenge the stereotypes and traditional beliefs but these appear to remain strong against the provisions anti-discrimination (Ocran, 2017). The country has legal and constitutional provisions to protect vulnerable groups. The UN Convention on the Rights of People with Disabilities was signed in 2007 and ratified it in 2012. This was a sign of the country's commitment to protecting the rights of disabled people and empowering them for full social participation. In 2006, the Persons with Disabilities Act (Act 715) was passed by parliament. Among others, Act 175 provides for rights such as unrestricted access to public places and buildings, free health care, employment, education and transportation.

In addition to the Persons with Disabilities Act, the rights persons with disabilities are defined by Article 29 of the Constitution of Ghana, approved in 1992. The Children's Act of 1998 (Act 560), the National Health Insurance Act of 2012 (Act 852), the Education Act of 2008 (Act 778) and the Labour Act of 2003 (Act 651), all have provisions to protect the rights of persons with disabilities, eliminate social exclusion and discrimination.

A limited observation of the laws, and the lack of policies to support their implementation, such as to determine a minimum employment quota for persons with disabilities, make it difficult to achieve effective compliance. In this context, the study sought to ascertain the level of knowledge and compliance of industry players and training providers in the Tourism and Hospitality sector with laws and policies supporting the inclusion of persons with disabilities.

The study found that staff of training institutions are aware of the Education Act and the Persons with Disabilities Act. They mentioned the provisions of the laws on equality and non-discrimination and on rights to accessibility, and highlighted the lack of accessibility of school buildings.

School administrators of all training institutions admitted that the lack of compliance with the legal provisions for accessibility was as a result the non-enforcement of the Persons with Disabilities and the Education acts. They mentioned that the government had failed to set an example, since existing buildings, constructed fourteen years ago, were not designed and neither remodelled to provide appropriate access to persons with disabilities



If the Government, after the approval of the Education and Persons with Disabilities laws, did not set an example by building disability compliant school infrastructure, how can one expect the private schools to take the lead?

► **A respondent**

Inclusive institutional policies support compliance with laws. However, the institutions that participated in this study did not have internal policies in accordance with the legal provisions for accessibility of

the Persons with Disabilities Act and the Education Act. The study found that there is a lack of efforts, at the government level, to ensure compliance with the laws.



The status quo persists because there has never been a coordinated effort to ensure all public and private educational institutions are inclusive, as prescribed by the Persons With Disabilities Act. This is perhaps the result of passing a law fourteen years ago without a legislative instrument... moving forward. If Ghana wants training institutions to adopt inclusive policies; this must be spelled out in legislative instruments passed by parliament. It is in these legislative instruments that one can find the details regarding what to and how to enforce compliance when it comes to the issue of inclusive policies in training institutions.

The National Council of Persons with Disabilities was established under Section 41 of the Persons with Disabilities Act (175) with the main objective of proposing and developing policies and strategies to enable the entry and participation of persons with disabilities in society. It is their mandate to co-ordinate and monitor the implementation of policies and programmes relating to persons with disabilities at the national level by relevant government agencies and non-governmental organisations.

Respondents indicated that poor funding over the years has limited the Council's ability to exercise oversight on the inclusion of persons with disabilities in the Tourism and Hospitality sector. The Council is currently in the process of engaging stakeholders, including training institutions and industry sectors, in adopting Inclusive Standard Operation Procedures. This, according to the Council, will provide a basis for monitoring and ensuring compliance with laws.

There is no agency directly responsible for ensuring the compliance of schools and businesses in the tourism and hospitality sector with the legal provisions for inclusion of persons with disabilities. Government's agencies with responsibilities in the sector, such as Ghana Education Services, the Council of Technical Vocation, Education and Training (COTVET) and Ghana Tourism Authority do not reinforce the legal provisions for disabilities inclusion, according to interviewed students and instructors.



Their occasional visits to the schools never had inclusion as an agenda.

Management staff of four and five-star hotels demonstrated a deeper knowledge of the provisions for disabilities inclusion of the Persons with Disabilities Act, when compared to staff of other companies. More specifically, they demonstrated awareness of the provisions related to non-discrimination, accessibility, requirements for transfers and the process for securing tax rebates.

Management staff of one to three-star hotels, restaurants, rental companies and bars understand inclusion as the accessibility of their clients to their establishments, and do not take into account the rights of persons with disabilities for inclusion into employment.

Persons with disabilities employed at five-stars hotels admitted that within the disabled community there was very little or no awareness of their rights, especially in relation to collective bargaining and to human resource policies. Those who enjoyed their rights viewed them as privileges. This highlights the need to educate persons with disabilities about their rights and responsibilities at school and at work, and is of particular importance in enabling them to advocate for their rights.

The lack of regulatory enforcement by the Ghana Tourism Authority was mentioned as the main cause of non-compliance with the legal provisions for disabilities inclusion. According to interviewed staff, their regular visits reinforce the payment of the tourism levy and monitor the compliance with sanitation standards. Voluntary compliance with legal rights of persons with disabilities is not adopted because it involves costs. Four to five stars hotels adopt international policies and comply with their own international corporate oversight systems with respect to disabilities inclusion. This practice, at the country level, more than supporting existing laws, ensures their commitment to society.

4.4. Suitability of training to the needs of persons with disabilities

This study observed the suitability of training and assessments to the needs of persons with disabilities. The mode of delivering instructional materials was of particular concern to the study. The rationale was to ascertain the extent to which the mode was inclusive and enabled persons with disabilities to access course materials. In all training institutions, course materials are available in soft and hard copy formats. They are available to students in the form of handouts or sent via emails, including references to online portals. Staff at the administrative level admitted that the mode of delivering course materials is not inclusive, and particularly for students with visual disabilities.

The lack of facilities to convert training materials to brail or audio files is the reason why they are not accessible to persons with visual disabilities. Among interviewed institutions, one had to refer a person with visual disabilities to enrolment in training at another institution, since they did not have facilities to accommodate this type of disability.

Assessments at the interviewed training institutions are of two types: internal and external. Internal assessments held in workshops cover the practical part of TVET, while those held in classroom cover the theoretical part and are in the form of written examinations. External assessments are held at the workplaces where students are engaged in practical training. In both types of assessments, the same approach is applied to all students. In classroom, exams are delivered in printed form. Practical exams, either internal or external, require work on the completion of task results that are visually inspected. In both forms, internal or external, assessment do not provide for disabilities inclusion.

In the case of visual and hearing disabilities, although facilities to convert texts to brail or to audios are not available, training institutions that participated in this study welcome any student who can afford their own disability inclusion solution. Interviewed staff at one of the training institutions mentioned the case of a student with hearing disability who hired a sign interpreter to assist him during lectures. However, according to them, very few could afford this solution, and this highlights the need of making training more inclusive to persons with disabilities.

Emphasis must be placed on enforcement to improve the disabilities inclusion in technical vocational education and training, since the legal provision exists: section 18 of the Persons with Disabilities Act (715) establishes the right of free education for persons with disabilities. According to the National Council for Persons with Disabilities, fees continue to be charged, including at public schools, and are a major contributor to exclude persons with disabilities from training.

The study noticed that the number of instructors in each training institution is adequate and complies with the rule of an average class size of thirty students. However, they are not trained in inclusion. The

training institutions also do not have sign language interpreters among their staff. School authorities indicated that they could not afford hiring these professionals to support prospective students, since their costs are high and they already face high training costs that are not all supported by the relatively low fees being charged.

The absence of disabilities inclusion training facilities, especially for those with visual disabilities and those with hearing disabilities, and the lack of training programs for the Tourism and Hospitality sector at special schools explains the very low participation of persons with disabilities in employment in the sector.

An estimate 500 students attend to training at the institutions that participated in this study. There were no persons with disabilities enrolled at training in these institutions. In the recent past, there were only two persons with physical disabilities enrolled at the sampled institutions. Interviewed staff reported that they successfully completed training and were encouraged and supported by the institutions and their colleagues. However, they were responsible for paying their school fees. In this cases, the study also found that the lack of disabilities inclusion facilities at the training institutions did not impact their learning achievements.



I mentored a female student with physical disabilities enrolled in training for catering services. Her level of learning achievement was at par with other students. Her performance was not affected by her disability. She was doing far better than many of the students in her class. That lady was exceptional. Irrespective of her challenge, she worked with no limitations and, believe me, in most cases, she did even better than others.

The good performances of the persons with disabilities enrolled at the sample trained institutions resulted from the inclusive environment created by students and instructors. Although the instructors were not training in disabilities inclusion, their support was driven by good conscience.

4.5. Good practices on disabilities inclusion

4.5.1 Training institutions

The study found that the social consciousness of instructors about persons with disabilities is critical to ensure an inclusive learning environment. Support to their effective participation in training activities contributes to good learning achievements.



I recall a practical training on how to prepare cakes. The student with a physical disability in her hand had difficulties

in catching up with the cake preparation steps. All of the other students were far ahead. Since the process involved group learning, it was not suitable for her. She began to show signs of frustration. The instructor took some extra time to guide her through the process and eventually she was able to attain the same level of achievement of other students.



The student recently completed a catering programme at a leading catering school in Accra. She had a deformity in her hands due to a congenital malformation. Her right hand is half the length of the left 'normal one'. School staff confirmed she required some support in lifting items in the kitchen during practical work and the supportive attitude of her colleagues and instructors contributed to make her complete the learning processes without feeling excluded. According to the school's principal, when students and instructors adopt positive attitudes towards persons with disabilities, it makes the school environment more inclusive.

Inclusive policies support accessibility at school, the availability of pedagogical approaches and materials and staff trained to support the enrolment of persons with disabilities in training programmes. This study found that none of the sampled training institutions have inclusive policies, and with most practices being tokenistic than policy driven.

4.5.2 Industry Establishments

The attitudes of employers and workers and incentives for persons with disabilities are critical in promoting an inclusive working environment. In hotels that had persons with disabilities among their employees, the study found that staff had a positive attitude towards them. Staff were given an orientation prior to formal recruitment, which included the observance of non-discrimination, mutual respect and teamwork. These protocols were also embedded in their human resource policies to ensure integration and regular compliance, thereby making it part of the culture at the workplace.

Interviewed staff with disabilities indicated they remained and progressed in their careers not only because of their employer's support but also because of the support and receptiveness of their colleagues. At one of the interviewed hotels, a person with disabilities had worked for over a decade, progressing from the position of waiter to the position of manager.

Traditional empathetic Ghanaian attitudes towards persons with disabilities complement existing inclusive, non-discriminatory policies. This study notices that these attitudes are the reason the why even

in institutions that do not have a policy to support disabilities inclusion, workers with disabilities can count on the support of their colleagues. The staff of a two stars hotel always tried to communicate in the sign language with a colleague that has total hearing impairment. According to the manager, they all learned some basic sign language in their interactions with their colleague, who has been working there for over five years. This particular example shows that the process of integrating persons with disabilities at work is a dual effort, and not only a gesture from staff without disabilities.

The effort of persons with disabilities to integrate at work is even more remarkable, as in the follow example at a sampled 5 stars hotel:



At our hotel, a manager with a physical disability started working as a waiter. When the restaurant he worked at was less busy, he sought permission from his supervisor to work at another restaurant. He did not want to look different, so he always tried to use the stairs even though there is an escalator. He blended well with the other staff. Two years ago, (2018), when there was a vacant position for a manager it was obvious that he would be chosen because of the extra work he always did and how he mixed with other staff, and he was selected for the position he occupies now. Regardless of his challenges, he excels. He is now the Master Trainer for the corporate office and trains all the managers in the Food & Beverages department.

This example also shows how the existence of inclusive policies contributes to support efficiency at work and career development for persons with disabilities.

▶ 5. Conclusion and Recommendations

Evidence suggests that the inclusion of persons with disabilities is not fully supported in the training institutions and industry establishments in the Tourism and Hospitality sector. The practice of non-inclusive approaches range from services, such as admission processes to facilities for persons with disabilities, such as access to buildings and training materials. Perceptions and attitudes towards persons with disabilities and the absence of stronger mechanisms to enforce compliance with existing laws contribute to low inclusiveness in the sector.

A disregard for the laws on disability, and particularly the Persons with Disabilities Act (715, 2006), in force during the past fourteen years, prevents persons with disabilities from enjoying their rights. A basic principle of the law, their right to education, while not being enforced further impacts their right to decent work. Since there are barriers that inhibit their access to training, they cannot develop the skills needed to pursue employment opportunities, as shown in the results of this study.

Deficits at the institutional level, such as the absence of policies to ensure compliance with the Persons with Disabilities Act and the provisions for disability rights in the Education Law, largely contribute to the lack of support for the inclusion of persons with disabilities in the sector. In addition to this, the critical role of the National Council of Persons with Disabilities in monitoring, coordinating and ensuring compliance is not being fulfilled, as this institution struggles to make any real impact due to weak institutional capacity.

The National Council for Persons with Disabilities should strengthen its monitoring, evaluation, coordinating and regulatory oversight, as defined under section 42 of the Persons with Disabilities Act. The Council should work closely with government Ministries, Departments and Agencies (MDAs), and specifically the Ghana Tourism Authority, Ghana Education Service and the Tourism and Hospitality Sector Skills Body to ensure compliance with existing laws. The involvement of the Ghana Federation of Disability Organisations (GFD), a key stakeholder representing Civil Society on the governing board of the National Council for Persons with Disabilities, in this process is also of high importance.

More specific recommendations based on the results of this study are as follows:

5.1. Access barriers

Training institutions

- ▶ The National Council of Persons with Disabilities should collaborate with the Ministry of Education and Tourism to develop inclusive policies for all training providers in the sector.
- ▶ Training institutions must advertise admission vacancies in media accessible to persons with visual and hearing disabilities. This includes investing in audio adverts, television adverts and the diffusion of vacancies to special schools and members of the Ghana Federation of Disability Organisations to reach out for persons with disabilities.
- ▶ The previous recommendations cannot support the enrolment persons with disabilities in training if the facilities in training institutions are not adapted for accessibility. In the short term, schools housed in two or more storey buildings should consider moving the lecture rooms to the ground floor.
- ▶ In the medium term, within the next two years, the Ministry of Education and Tourism should provide funds to upgrade existing public training institutions to make them inclusive.
- ▶ The National Council of Persons with Disabilities should work with the Ministry of Education, the Ministry of Tourism, Ghana Education Services and District Assemblies to ensure the renovation of

public schools to improve accessibility, and to closely monitor compliance with the provisions in the laws.

- ▶ In the long term, the approval of building permits for private educational facilities, especially those running hospitality and tourism programmes should enforce compliance with accessibility. This shall be in accordance with section 5 (1) of the Education Act 2008, which mandates District Assemblies to ensure that educational facilities are disability friendly.

Learning environment

- ▶ There is a need of government support to adapt teaching and learning environments for students with disabilities. It is recommended that braille instructors and sign language interpreters are deployed by the Ministry of Education through the Ghana Education Service to existing training institutions, as required by the Persons with Disabilities Act 2006 (715). The National Council of Persons with Disabilities should play a leading role in this process.
- ▶ The National Council of Persons with Disabilities in collaboration with the Ministries of Education and Tourism should provide training to instructors with the objective of equipping them with skills for disabilities inclusion.
- ▶ In addition to the provision of training on disabilities inclusion to existing instructors, the National Council of Persons with Disabilities, in collaboration with the Ministry of Education, should ensure that disabilities inclusion is a subject in training programs of the Colleges of Education that provide training to TVET instructors, and especially those involved in training for the Tourism and Hospitality sector.

Industry

- ▶ The National Council of Persons with Disabilities must collaborate with the Ghana Tourism Authority and the Hotels Association to support local hotels in the development and adoption of inclusive Human Resource policies. The implementation of these policies should be enforced by National Council of Persons with Disabilities and the Ghana Tourism Authority.
- ▶ Presently, there are no clear incentives for employers to hire persons with disabilities, and the implementation of the provisions for tax rebates, on section 10 of the Persons with Disabilities Act 2006 (715), is complex. To motivate industry, it is important for the National Council of Persons with Disabilities to develop a framework to guide industry players in the implementation of these tax rebate incentives.
- ▶ The approval of permits for the construction and operation of new hotels and restaurants should be conditioned to the provision of accessibility. It is recommended that the Ghana Tourism Authority liaises with the District Assemblies to enforce compliance with accessibility according to the provisions in the law. It is suggested that hotels and restaurants get up to two years to comply with the law.
- ▶ The Ghana Tourism Authority should issue guidelines for industry players to develop workplace policies that protect the rights of staff with disabilities. The implementation of these policies should be enforced in their regular monitoring visits to businesses establishments. Enforcement should be accompanied by sanctions for non compliance.
- ▶ There is a need for action to facilitate the employment of persons with disabilities in the Tourism and Hospitality sector. The ministries of Employment and Labour and the National Council of Persons with Disabilities should advocate for a minimum employment quota for persons with disabilities in all industry sectors. This should be part of the on-going review of the Persons with Disabilities Act. Germany provides a successful example of the application of a system of quotas in which public and private sector employers with more than 20 workers are subject to recruit at least 5 percent of their staff among persons with disabilities.

Regulatory compliance and enforcement

The Ghana Tourism Authority and the National Council of Persons with Disabilities must strengthen regulatory compliance with disabilities inclusion through the development of standard operation procedures for businesses; campaigns to raise the awareness of its regulations and the implementation of enforcement mechanisms, in the form of sanctions and rewards, in their compliance monitoring systems.

▶ References

- Banks, G. (2009). Evidence-based policy making: What is it? How do we get it?
- Ocran, J. 2017 Disability and Stigma: Interrogating Middle-Class Experiences in the Social Spaces of Ghana. Ghana Statistical Service. 2012. "2010 Population and Housing Census.". Accra: Ghana Statistical Service.
- Head, B. (2010). Evidence-based policy: principles and requirements. Strengthening evidence-based policy in the Australian Federation, 1(1), 13-26. Kassah, Alexander K. 2008. "Begging as Work: A Study of People with Mobility Difficulties in Accra, Ghana." Disability & Society 23 (2):163-70
- Picton, Alison. 2011. "Denying Ghana's Disabled Their Rights. The Disability Act: 5 Years on". Accra, Ghana: CHRI Africa
- Republic of Ghana. 1992. 1992 Constitution of the Republic of Ghana. Accra, Ghana: Republic of Ghana.
- Republic of Ghana. 1998. Children's Act (Act 560). Accra, Ghana: Republic of Ghana.
- Republic of Ghana. 2003. Labour Act (Act 651). Accra, Ghana: Republic of Ghana.
- Republic of Ghana. 2006. Persons with Disability Act (Act 715). Accra: Republic of Ghana
- Republic of Ghana. 2008. Education Act (Act 778). Accra, Ghana: Republic of Ghana.
- Republic of Ghana. 2012. National Health Insurance Act (Act 852). Accra, Ghana: Republic of Ghana.
- Sackey, Emmanuel. 2015. "Disability and Political Participation in Ghana: An Alternative Perspective." Scandinavian Journal of Disability Research 17

► Annexes

1. Study Participants

Training Institution	Training Program	Duration of Program	Type of Certificate
A	BSC Tourism	4 – Years	Degree
B	<ul style="list-style-type: none">► Front Desk Management► Cookery► Tour Guide► Conferencing	6 – Months	Certificate
C	Hospitality	3 – 3 Years	Certificate
D	NVTI Proficiency	1 – 2 Years	Certificate 1 & 2
E	Catering	1 – Year	Certificate

Industry Establishments

Hotels	Category
1	5-star
2	4-star
3	3-star
4	2-star
5	1-star
Restaurants (2)	High
	High
Chop Bars (4)	High
	High
	High
	High
Canteens (1)	Low
Car Rentals (1)	n/a
Recreational Facilities	n/a

Questionnaire A – TVET Instructors/Students

Respondent name/code

Sex: Male Female (please circle)

Person with or without disability (please circle)

Contact details

Name of institution

Programme

Region/district

Community

Inclusiveness of the learning environment

- ▶ What programme are you attending to and why?
- ▶ (In your opinion) How relevant are the courses offered by this institution to the students and the society?
- ▶ How easily (in terms of transportation) is it for students to get to and from the school?
- ▶ How easily (in terms of mobility) do students get around the classroom, workshop or training facility?
- ▶ Do students have easy and safe access to training materials and equipment in classroom and at workshops (at school, out of school training facilities)?
- ▶ In what forms are course materials presented (for example : printed, online, etc) ?
- ▶ Can students, and especially students with disabilities access course materials in the forms in which they are currently presented? If no, why, and what can your institution do to improve access to them?
- ▶ With regard to group activities, can students with disabilities engage other students?
- ▶ If yes, how do they participate?
- ▶ If no, why and what can be done to ensure inclusive in classroom group activities?
- ▶ With regard to practice, can students with disabilities engage in practical work the same way other students do? If no, why?
- ▶ How do instructors address the individual needs of students in class, including students with disabilities?
- ▶ What can be done to improve the (training) system and make it more inclusive?
- ▶ With regard to testing or performance evaluation, what type of support or other adjustments, if any, do you think students with disabilities need?
- ▶ Can students with disabilities learn in the classroom the same way as others?
- ▶ If no, what are the barriers? How can the barriers be removed or overcome?
- ▶ Do students feel integrated in the school/classroom? If yes how and if no why?
- ▶ Do students with disabilities participate in classroom management in school? If No, why? What can be done to enhance their participation in classroom management?

- ▶ Are the learning achievements of students with disabilities comparable to those of other students? If there are differences, why?
- ▶ Can you give an example of how your institution supported a person with disability to participate efficiently in the learning process?
- ▶ Can you share a case where a student dropped out because he was not successfully integrated and what will you have done differently to avoid drop out?

Institutional policies and practices

- ▶ How does the school call student for applications (to their training programs)?
- ▶ Are the media of advertising vacancies inclusive? If yes how and If no, why?
- ▶ What obstacles prevent the school from adopting an inclusive student application process?
- ▶ Does the school admission policy have a quota for disability?
- ▶ If yes, what does the policy prescribe and are they being implemented?
- ▶ If no, why, and what prevents the school from adopting an inclusive admission policy?

Knowledge of inclusion laws, policies (staff)

- ▶ Are you aware of the provisions in the Persons with Disabilities Act 2006 (715) and the disabilities rights under Ghana's Education Act 2008 (778)?
- ▶ If yes, how has your knowledge of the law affected the management of the school?
- ▶ If no, why, and what could be done to improve staff/students' knowledge of laws and policies supporting the rights of persons with disabilities?
- ▶ Does the institution have any internal policy on inclusion? If yes, could you provide an example? If not, why?
- ▶ Any recommendation for improving the inclusion of persons with disabilities in training programmes?

Questionnaire B – Tourism and Hospitality Industry Sector

Respondent name/code

Sex: Male Female (please circle)

Person with or without disability (please circle)

Contact details

Name of institution/organisation

Type of Business (hotel, restaurant, chop bar, car rental, tourist location etc.)

If hotel, circle either of the following (1-star, 2-star, 3-star, 4-star and 5-star)

Region/district

Community

Position: Management / HR/ or other staff /level

- ▶ Do you consider the inclusion of persons with disabilities relevant in your work?
- ▶ If no, why not? If yes, why?
- ▶ Is your company's employment policy inclusive?
- ▶ If yes, what specific measures are implemented to ensure inclusion?
- ▶ If no, why, and what can be done to ensure inclusion at the workplace?
- ▶ Are there staff with disabilities? Which disability types and how many are they?
- ▶ How are adverts for jobs made?
- ▶ How inclusive is advertising process? What are the impediments?
- ▶ How can the process be made more inclusive?
- ▶ Are there any differences between the recruitment process of persons with disabilities and of other staff? If there is a difference, why, and what could be done to make your recruitment process more inclusive?
- ▶ Are there any differences between the selection criteria for persons with disabilities and other staff? If there is a difference, why, and what could be done to make your selection process more inclusive?
- ▶ Are your staff appraisal and promotion processes inclusive?
- ▶ If yes, could you mention some specific actions that make them inclusive?
- ▶ If no, why and what could be done to make your appraisal and promotion processes inclusive?
- ▶ Can you share with us any best practices where persons with disabilities have successfully been integrated in the organisation?

Knowledge of provisions in laws and policies for disabilities inclusion

- ▶ Are you aware of the provisions in the Persons with Disabilities Act, 2006 (Act No. 715) and the disability rights under the Labour Act, 2003 (Act No. 651)?
- ▶ If yes, how has your knowledge about the laws affected the management of the company?
- ▶ If no, why, and what could be done to improve management and staff knowledge of laws and policies supporting the rights of persons with disabilities at work?
- ▶ How has your company been complying with existing legal provisions for persons with disabilities?
- ▶ Are there any regulations from the Ghana Tourism Authority regarding employment and inclusion of persons with disabilities at the workplace?
- ▶ If yes, how does your company comply with the these regulations ?
- ▶ Any recommendation for improving the inclusion of persons with disabilities at work?

► **Contact:**
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Skills and Employability Branch

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