

NAD/ Draft NPPWD/2022

29th August,2022

To

Shri D.K.Panda
Under Secretary
DEPARTMENT OF EMPOWERMENT OF PERSONS WITH
DISABILITIES (DIVYANGJAN)
Ministry of Social Justice & Empowerment
5th Floor, Room No.519 (B-II), PanditDeenadayalAntyodaya Bhawan,
CGO Complex, Lodhi Road,
New Delhi-110003.

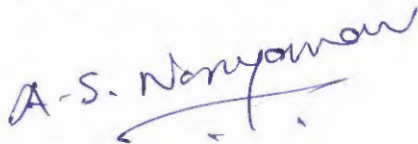
Subject: Draft National Policy for Persons with Disabilities- regarding.

Dear Sir,

This is in reference to the public notice dated 9th July, 2022, which was subsequently extended up to 15th July, 2022. The Department hereby further extends the last date of receiving comments up to 31st August, 2022 for wider stakeholder participation wherein comments have been invited for the Draft National Policy for Persons with Disabilities. Please find enclosed our recommendation for deaf community regarding National Policy for Persons with Disabilities.

Sir, we sincerely hope that you will agree to our request to initiate the process on the subject cited above. This is a need of people with deaf in India and vital to national policy for deaf in line with provisions in UNCRPD and Rights of Persons with Disabilities Act 2016. We look forward for a positive response by including of Indian Sign language.

Yours Sincerely




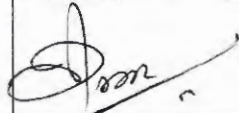
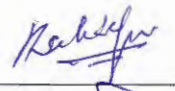

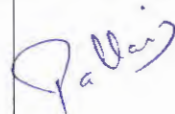

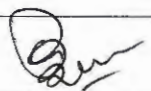
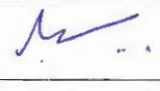
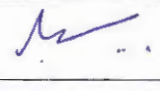
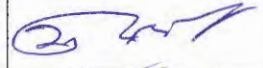
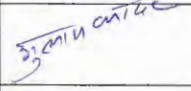


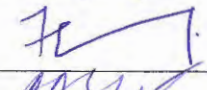

(A.S.Narayanan)
President

National Workshop for Draft National Policy for Persons with Disabilities

Saturday – Sunday, August 13th and 14th, 2022

Conference Hall, AJYNISHD(D), Mumbai (Maharashtra)

S.No.	Name of the Participants	Organisation	Signature
1.	Mr. A.S.Narayanan	President, National Association of the Deaf	A.S. Narayanan
2.	Mr. Anuj Jain	Expert Advocacy for Deaf Rights	Anuj Jain
3.	Mr. Saju Stephen	Former President, Madhya Pradesh Association of the Deaf and Secretary, National Association of the Deaf	Saju Stephen
4.	Mr. Sibaji Panda	Director, Happy Hands School for the Deaf	Sibaji Panda
5.	Mr. Alok Kejriwal	Managing Director, AAPL Solutions Founder & CEO India Signing Hands Pvt. Ltd.	Alok Kejriwal
6.	Mr. Aqil Chinoy	Project Director, Signing Hands Foundation and former Vice President, NAD	Aqil Chinoy
7.	Mr. Sunil Sahasrabudhe	President, All India Federation of the Deaf	Sunil Sahasrabudhe
8.	Ms. Saudamini Pethe	Director, All India Foundation of Deaf Women	S. Y. Pethe
9.	Mr. Pradeep More	Secretary, State Level Association of the Deaf (SLAD)	Pradeep More
10.	Mr. G.V.Reddy	Founder, Haryana Sports Council of the Deaf	G.V. Reddy

11.	Mr. Siddharth Gautam	Joint Secretary, Disabled Employee Association of Railway	
12.	Mr. Issac K.C.	Advisor, All India Sports Council of the Deaf	
13.	Mr. Babu Eapen	Secretary, All Kerala Federation of the Deaf	
14.	Mr. Mohammad Shafique	Vice President, Madhyanchal Deaf Association	
15.	Ms. Pallavi Kulshrestha	Project Planning and Management Officer, Haryana Welfare Society for Persons with Speech and Hearing Impairment	
16.	Mr. Arun C. Rao	Executive Director, Association of Sign Language Interpreters (ASLI)	
17.	Kanchan Pamnani	Advocate & Solicitor	
18.	Mr. Ramesh Chandra	President, Chhattisgarh Deaf Association	
19.	Smt. Geeta Sharma	Vice President, National Association of the Deaf	
20.	Mr. Surendra Pareek	Rajasthan Association of the Deaf	
21.	Mr. Gulab Khan <i>Gulam Kadar</i>	Rajasthan Association of the Deaf	
22.	Mr. Sapan Jain	ISL teacher and DTISL Coordinator, Haryana Welfare Society for Persons with Speech and Hearing Impaired	
23.	Mr. Murali K.	Deaf Leaders Foundation	
24.	Mr. Ferdinand Lyngdoh	Research Scholar and Joint Secretary, NAD	
25.	Mr. Akshay	NCPEDP	

26.	Ms. Kinjal Shah	Secretary, Indian Sign Language Interpreters Association (ISLIA)	<i>K.S. Shah</i>
27.	Dr. Renuka Rameshan	President, Association of Sign Language Interpreters (ASLI)	<i>Renuka Rameshan</i>
28.	Ms. Kanika Aggarwal	Expert (Education)	<i>Kanika Aggarwal</i>
29.	Mrs. Mansi Shah	Head of Operations, India Signing Hands	<i>Mansi Shah</i>
30.	Mr. Harish Bhatia	Coordinator & Signer, India Signing Hands	<i>Harish Bhatia</i>
31.	Ms. ARTI UMROTKAR	ISL INSTRUCTOR, AYJNISHD(D)	<i>Arti Umrotkar</i>
32.	S. Vijay Kumar	SLT / AYJNISHD(D) member	<i>S. Vijay Kumar</i>
33.	Nishwas Patil	ISL Instructor, AYJNISHD(D) Bangalore	<i>Nishwas Patil</i>
34.	Priyadarshini Sundaram	Content Editor, ISL News	<i>Priyadarshini Sundaram</i>
35.	Yadnesh Maladkar	IT-Technical + Photography	<i>Yadnesh Maladkar</i>
36.	Akash Shekarpure	NCPEDP	<i>A.A. Shikre</i>

National Workshop for Draft National Policy for Persons with Disabilities

Saturday – Sunday, August 13th and 14th, 2022

Conference Hall, AJYNISHD(D), Mumbai (Maharashtra)

Agenda

13-08-2022 (Saturday)	
9.30 am to 10.00 am	Registration and arrival of delegates
10.00 am to 10.15 am	Opening Session
10.15 am to 11.15 am	Brief of National Policy for PWD + Q&A, by Adv. Kanchan Pamnani, Advocate & Solicitor
11.15 am to 11.30 am	Tea / Coffee Break
11.30 am to 1.00 pm	“Education” by Sibaji Panda and Sunil Sahasrabudhe, “Disability Certificate” by A. S. Narayanan
1.00 pm to 2.00 pm	Lunch
2.00 pm to 3.30 pm	“Health” by Pallavi Kulshrestha, “Skill Development and Employment” by Arun C.Rao
3.30 pm to 4.00 pm	Tea / Coffee Break
4.00 pm to 5.00 pm	“Accessibility” by Aqil Chinoy
5.00 pm to 6.00 pm	Discussions

14-08-2022 (Sunday)	
9.30 am to 11.00 am	“Sports, Culture and Recreation” by Isaac K.C. and Babu Eapen
11.00 am to 11.30 am	Tea / Coffee Break
11.30 am to 12.00 pm	Protect of rights of PWD’s and other Policy measurers by Dr.Renuka Rameshan
12.00 pm to 1.00 pm	“Women & Children” by Saudamini Pethe “Lack of Data and Invisibility of Persons with Disabilities” by Mr.Akshay, NCPEDP
1.00 pm to 2.00 pm	Lunch
2.00 pm to 3.30 pm	Summary of Recommendations
3.30 pm to 4.00 pm	Tea / Coffee Break
4.00 pm	Departure

Recommendations for the National Policy for Persons with Disabilities

Policy Measures given on Women & Children and further recommendations

Chapter 1.9

(h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities

Recommendations:

- Schools and related services can run Parental counselling and awareness regarding preserving the identity.... **counselling** through Deaf success stories.... a database of successful role models to be connected with relevant government web portal
- Aim to remove stigmatized view of **disability** (religious perspective – **sinful person** hence suffering from disability) identity is not preserved with such a negative perspective of disability <https://journal.cjgh.org/index.php/cjgh/article/view/250/707>

Chapter 2.2 The policy

Recognizes that women and girls with disabilities are at greater risk and are prone to violence, abuse and exploitation.

• Recommendations:

- Sex Education (Accessible mode) (especially for school going girls)
- Awareness content related to Health and Hygiene, Gender, Puberty, Abuse, Sex & Pregnancy to be made ISL accessible for PwDs especially women (2.2).
- Teacher and Parent training.
- Peer environment for better sharing of experiences regarding female issues and health, Chennai rape case - <https://www.thequint.com/news/india/22-men-rape-hearing-impaired-girl-chennai> (Girl was not able to express her exploitation in advance because of lack of peer environment and ISL accessible medium)
- Parental counselling regarding Deaf association/activists intervention and interaction for better understanding by society (gives a sense of belonging to a group and creates protective

environment) (Palwal rape case)
<https://caravanmagazine.in/communities/an-open-letter-to-our-deaf-daughter-from-palwal>
<https://www.youtube.com/watch?v=B3C56gNb2nc&t=165s> (has voiceover in Hindi)

Recognizes that children with disabilities should have the freedom on equal basis at par with children without disability

- Recommendation: Create periodical awareness campaigns for preserving identity of the Deaf Child
- 1. Chapter 2 number 2.2, it mentions on emphasizing the use of Indian Sign Language (ISL) as an effective mode of non-verbal communication. Thus, it also needs to include Local sign language to make accessible for all deaf community.
- 2. Chapter 2 Number 2.4, its mission is to promote research on the field of Signs linguistics of Indian Sign language in India.
- 3. According to the number 3.2.4. Language development should include for those who are born Deaf. (Focus on Indian Sign language from the early stage of life to prevent language Deprivation)

Chapter 3.1.4

Women and Child Development workers need sensitization

- Recommendation:
 - Periodical evaluation of the community level sensitization - 3 month

Prevention, Early Identification and Intervention (Chapter 3 – 3.2.5)

1. **Prevention of language deprivation in deaf children:** Deaf children, irrespective of the degree of hearing loss, should get access to age-appropriate language in the critical period of language acquisition (0-6 years) i.e., they are to be given opportunity to acquire Indian Sign Language (ISL) in the early years so that they do not face the damages of language delay and deprivation. **Provision of Indian Sign Language Teachers and Indian Sign Language Interpreters in all District Early Intervention Centres (DEICs) and Cross Disability Early Intervention Centres (CDEICs) to be done to ensure the same.**

2. **Trainings and Incentives for parents** such as travel allowance to learn various skills including Indian Sign Language (ISL) essential to communicate and support their child with disability at the DEICs.
3. **RCI** will take steps to ensure that all its teacher training courses pertaining to early childhood special education are accessible and expanded to more institutions so that we have more teachers skilled to cater to Early Childhood Care and Education (ECCE) as per NEP 2020. **Diploma in Early Childhood Special Education (Deaf) course** by RCI is currently not accessible to deaf candidates, has no mention of Indian Sign Language, and is being offered by just a few oral institutions in southern India.
4. **Robust Data mapping of all Persons with Disabilities** so that schemes, services and from early intervention, education, employment can be provided to them on timely basis

Information about Role models - PwD to be shared

Education (Chapter 5)

1. **Survey:** To conduct survey of school going children in every five years for identifying children with disabilities, ascertaining their special needs and the extent to which these are being met; (Chapter III Education, 17 (a)) **The survey process and team should include representation from PwDs.**

2. According to the chapter one number 1.4, it mentioned that as per the census 2011 the literacy rate of PwD is only 5% who are graduate and above. Imagine the percentage of Deaf people who are graduates. Thus, research and proper data on the low literacy rate for PwD should be done by the Ministry of Education especially the Education Department of the States.
3. **Accessibility to Quality Education:** Comprehensive steps to be taken to check and improve the quality of education being imparted to PwDs and increase the literacy rate for all PwDs. It has been observed that the majority of the special educators in deaf schools are not fluent in Indian Sign Language and hence are not able to communicate or teach the deaf children, leading to poor literacy and academic outcomes. RCI is required to arrange regular CRE workshops and strictly implement 300 hours of Indian Sign Language learning as per revised approved curriculum. While simultaneously also ensuring the existing quality of teacher training, especially the Indian Sign language training component is not compromised in any way, by making provision of Indian Sign Language teacher mandatory for all teacher training institutions offering special education courses related to Deaf.

4. **Train and employ teachers, including teachers with disability** who are qualified in sign language and Braille and also teachers who are trained in teaching children with intellectual disability; (RPWD Act Chapter III, 17 (c)). Reservation of posts for teachers with disabilities to be done in all special schools. In line with the above provision special courses encompassing sign language and bilingual education to be designed and training for teachers who are Deaf may be launched to ensure quality education for deaf children.
5. **Adequate representation from experts who are themselves PwDs** to be there in all the expert committees constituted by RCI / NCERT / NIOS and other government bodies pertaining to matters related to education of children with disability.
6. As announced by Hon'ble Prime Minister, Sh. Narendra Modi on the anniversary of National Education Policy, 2020 - **ISL to be recognized and taught as a subject in schools**. Indian Sign Language (ISL) should be taught by qualified deaf teachers. The course is currently limited to National Institute Open School (NIOS) on a distance learning mode. Indian Sign Language to be offered in regular mode by all state education board and allow deaf children to take this as a language subject.
7. Universities to set up **Centre for Disabilities Studies** to provide access in higher education to PwDs and take up research and development work related to disabilities. (RPWD Chapter V (27, 28), VI, VIII (47))
8. At least one **institution of higher education / University for Deaf** to be created in India similar to Gallaudet University in Washington DC, USA

Health (Chapter 6 – 6.13)

- Information about policies related to health need to be clearly accessible to PwDs including translation in Indian Sign Language and closed captions.
- Accessible Medical Services: Online interpreting services at government hospitals and basic sensitization of staff. (RPWD Act, Chapter V, 25 (b))
- Emergency helpline services to be accessible to all PwDs including facility to text and use video call in Indian Sign Language.
- System of booking sign language interpreters to be available on video call / in person in order to provide full access to deaf people by the health care providers, so that interpreters are booked as soon as deaf person makes an appointment and requests for the interpreter.
- Assistance Scheme for the payment of Sign Language Interpreters to be developed based on the model in other countries so that burden of payment does not always fall on the deaf person.

- Inclusion and Non-Discrimination of PwDs in the Insurance schemes and the claims by government and private agencies.

Skill Development and Employment (Chapter 7)

- Job advertisements for PwDs to be translated in ISL and shared in accessible formats, as per the reservation policy – 4 % reservation (RPWD Chapter V, 34)
- Incentives to employers in private sector. —The appropriate Government and the local authorities shall, within the limit of their economic capacity and development, provide **incentives to employer in private sector to ensure that at least five per cent of their work force is composed of persons with benchmark disability.** (RPWD Act 2016, CHAPTER VI Special Provisions For Persons With Benchmark Disabilities, 35)
 - All skill development institutions to provide ISL interpreters and in service training in ISL to instructors.
 - All equal opportunity cells in universities to launch DTISL and DISLI courses to provide a flow of interpreters needed for the skilling/education sector.
 - Allocation of responsibility for the awareness campaigns mentioned in the NPPWDs 7.9
 - Outline incentive schemes for corporates and private sector SME for hiring disabled persons.
 - Inclusion of PwDs in all media campaigns undertaken by the Govt.
 - Equal opportunity policy developed by the central govt shall be adopted by all States and UTs and it shall be in effect until the STATE/UT develops their own.

Sports, Culture and Recreation (Chapter 8)

- All museums should have the ISL accessible video description along with closed captions.
- Employment policy for National/ International winners in Paralympics and Deaflympics.

Chapter 8.1

The power of sports as a transformative tool is of particular importance for women with disabilities who often experience discrimination on the basis of gender and disability. It is estimated that only 7% of women with disabilities are

involved in sports, globally. Therefore, by improving inclusion of PwDs, sports can help advance the Sustainable Development Goals (SDGs).

- Recommendation:
 - Specific Schemes & Scholarships to encourage more women with disabilities to get education & employment with sports quota.
 - Special sports training and certification for women with disabilities

Accessibility (Chapter 9)

9.1 Accessibility is about giving access of a product, service or facility to the individual. This implies whether all users are able to access an equivalent user experience when they encounter a product, service or facility. When we consider the PwDs, accessibility draws significance as it is the primary tool for their empowerment and inclusion.

9.2 The concept of barrier free design dates back to 1950s at global level when its applicability was understood with respect to build environment. Slowly, other dimensions of accessibility such as transportation and ICT ecosystem were considered as part of the concept of design for all.

9.3 The Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, for the first time prescribed limited accessibility features such as ramps, lifts with Braille and auditory signals and adaptable toilets in public buildings, more specifically in hospitals, primary health centers and other medical care and rehabilitation institutions. Partial coverage of roads and transportation system was also envisaged. The Act neither provided for prescription of standards of accessibility nor any timeline for their compliance.

9.4 The discourse on accessibility underwent a sea change with the coming into force of the United Nations Convention on Rights of Persons with Disabilities (UNCRPD) in May 2008, which is based on the social 51 model of disability. Article 9 of the Convention deals with accessibility. It mandates the Member States to take measures to eliminate obstacles and barriers to accessibility, especially in the following:

- Buildings including schools, residential houses, hospitals and workplaces, roads, means of transportation and other indoor and outdoor facilities;
- ICT ecosystem including electronic devices and other services;
- Promulgate and monitor minimum standards of accessibility;
- Provide buildings and other facilities open to public with signage and braille;

- Provide training to stakeholders on accessibility issues;
- Ensure access to information; and
- Promote design, development and distribution of accessible ICT and System

9.5 India became a party to the Incheon Strategy on Asia Pacific Decade for Persons with Disabilities: 2013-2022. Goal 3 of this Strategy lays thrust on creation of barrier free environment for persons with disabilities. It aims at enhancing access to physical environment, public transportation, knowledge, information and communication. It also emphasizes that accessibility of urban, rural and remote areas based on universal design increases safety and ease of use not only for PwDs but also for other members of society.

9.6 With a view to prioritizing accessibility culture in the country, the Accessible India Campaign (Sugamya Bharat Abhiyan), launched in December, 2015 by DEPwD incorporates the philosophy of the social model of disability as incorporated in the UNCRPD and Incheon 52 Strategy and expanded the scope of accessibility along with its coverage. It envisages provision of accessibility in all facets in public buildings, transportation and ICT eco-system.

9.7 Further, the Rights for Persons with Disabilities Act, 2016 (RPwD Act) gave impetus to provision of accessibility. The Accessible India Campaign thus serves as an instrument for actualizing the aims of accessibility embedded in the Act. The output of Accessibility India Campaign is being periodically reviewed to improve outcomes through targeted interventions. Review the Accessible India Campaign policy every two years based on the survey of Persons with Disabilities. This will help to improve the campaigns outcomes.

9.8 The Accessible India Campaign has the following three dimensions of accessibility:

9.8.1 Built Up Environment:

The objective is to enhance the proportion of accessible government buildings by making provision for features such as steps and ramps, tactile paths in corridors, wide entry gates, reserved parking and toilets, to name a few. There needs to be more clarity on the definition of 'Environment for Deaf Schools'. Any videos displayed in public places must include Indian Sign Language translation. All buildings should have appropriate technology to create a barrier free environment that is accessible to PwDs. Appropriate devices will include items like: Emergency Flash Lights, lamps/lights to make areas brighter which

will aid Sign Language communication, door bells – vibrating alarm clock, Video Relay Service in hotels, etc.

9.8.2 Transportation System:

The focus is on providing equal rights to travel and use of public as well as private modes of transportation. Airports, Railway Stations and Bus Terminals as well as Carriers (Railway coaches and Buses) and related services such as ticket booking, enquiries, booking status, booking of special assistance, etc. are being developed to provide barrier free services.

9.8.3 Information and Communication Technology (ICT) Ecosystem:

With the increased dependence on digital and virtual services, the Accessible India Campaign is also promoting accessibility in websites, public documents and media content on TV while also working towards training of sign language interpreters. The key objectives are enhancing proportion of accessible and usable public documents and websites that meet internationally recognized accessibility standards, enhancing the pool of sign language interpreters and enhancing the proportion of daily captioning and sign-language interpretation of public television news programmes.

9.9 The RPwD Act, 2016 mandates the Government to frame accessibility norms in respect of built-up environment (public buildings), transportation system, ICT eco system and other facilities and services. Further, the Government is also required to take measures to provide accessibility features at bus stops, railway stations, airports and also ensure accessible roads to address mobility necessary for PwDs. It also mandates the Government to take measures to ensure that all content available in audio, print and electronic media and electronic/consumer goods are available in universal design.

9.10 As per the provisions of RPwD Act, 2016, Central Government notified the RPwD Rules in June, 2017 inter-alia laying down the Rules containing accessibility standards for public buildings, passenger bus transport, websites and documents to be placed on websites.

9.11 For the purpose of effective and real time monitoring of progress of targets under AIC, the MIS portal was launched in September 2019. Further, Sugamya Bharat App, a Crowdsourcing Mobile Application was launched on 2nd March 2021. This App is a means for 54 crowdsourcing of accessibility related

problems being faced by Public and enhancing accessibility in the built environment, transportation sector and ICT ecosystem in India by resolving complaints received. This App would enable Divyangjan and general public to bring to notice accessibility-related issues that require redressal. The vision and direction for this crowdsourcing App is based on Jan-Bhagidari for improving accessibility in our country. ACCESS-The Photo Digest, an Accessibility guidebook, for enhancing understanding of the requirements and specifications of Accessibility among professionals, government officials and officers/architects/engineers of various executing agencies has been launched.

9.12 The policy outlines the following measures to create a barrier free environment for PwDs enabling them to have an equal access to all facilities and services as that of others:

- All local body building bye-laws will incorporate accessibility standards specified under the harmonized guidelines for barrier free environment and space standard for PwDs and elderly or those specified under National Building Code.
- All the Central Ministries/Departments and States/UTs will ensure that every new public building conforms to the accessibility standards at the planning stage and the cost estimate will take into consideration accessibility features as per applicable norms. When buildings fail to conform to prescribed accessibility standards, complaints regarding the same must be redressed within fixed times. Violations must be penalized strictly. After every violation, the penalty must be doubled.
- The architectures and civil engineers and their associations will be sensitized so as to ensure inculcation of accessibility as well as universal design culture in all public infrastructure.
- The curriculum for engineering such as civil, electrical, mechanical, electronics, computer science, architecture, town planning, instrumentation, IT etc should have a component of accessibility and universal design. The curriculum should include work exposure with people with disabilities and gain practical experience about the application of universal design.
- The States/UTs will work out an action plan for making all their existing buildings accessible in a time bound manner. Violations must be penalized strictly.
- All new passenger buses will have accessibility features and the existing passenger buses will be phased out in a time bound manner.

- Efforts will be made to promote accessible passenger car for PwDs and accessible cab facilities will be made available at the airports, railway stations, bus stops etc. Drivers of such vehicles will be sensitized and trained about the needs of PwDs. On railway, bus, and other transport concession certificates as well as tickets, Deaf individuals must be identified as Deaf and terms such as 'Hearing Impaired', 'Deaf & Dumb', 'Deaf Mute' must not be used. Electronic devices for PWD like Alarm Lights in trains and planes. Driving Licenses should be given to PWD without discrimination. All tolls should be free for PWDs. Provide Tax-Write Offs on purchase of vehicles by PWD. Loop video instructions for directions for Deaf travelers.
- Efforts to be made to make Railway including metro coaches, platforms and services being offered inside the train and platforms accessible for PwDs in a time bound manner. Clear descriptive Visual Aids, Signages, notice boards & quick access booths must be provided at airports, bus stops, railway stations, metros, taxi stands, auto stands and other forms of public transport. These places must also provide Indian Sign Language interpreters. Trains must have basic accessibility features for the Deaf. Complaints should be redressed periodically and failure to provide accessibility within a fixed timelines, should lead to penalization. Concessions should be given to the Deaf travel via Railways & Airways. Include Deaf individuals and other PWD experts in decision making related to make public transport more accessible.
- All the International/Domestic airports will have to meet the accessibility norms. All new airports or upgradation of airports will have to incorporate universal designing principles. The services in the airport including facilities at screening and security check up and boarding & de boarding facilities should comply with accessibility norms. M/o Civil Aviation will issue comprehensive guidelines for compliance by airport authorities and airlines.
- The Ships vessels, ports, dockyards, jetties and inland water terminals will have accessibility features on the principle of universal design for seamless use by PwDs.
- All websites, both government and private will meet the Govt. of India Guidelines as amended from time to time. At the time of granting security clearance for hosting any new website MeitY will develop a system of checking compliance with the accessibility standards. All the official

documents issued by the Government such as those related to transport, Income Tax, etc. including public service announcements, must be broadcasted with Indian Sign Language translation for the Deaf. Deaf experts must be consulted for such translations.

- All mobile apps which are relevant for use of public in general should comply with accessibility standards. Emergency aid helplines and public service Apps related to police/hospital/women created by the government must be made accessible to the Deaf by providing video call options through Indian Sign Language interpreters.
- All TV content, films, documentaries and videos will have sign language interpretation or close captioning facilities for persons with hearing impairment and audio description for persons with visual impairment. In the current condition, due to lack of quality education for the Deaf, Indian Sign Language translation should be encouraged over closed captions. TV, Theatres & OTT platforms must also provide Indian Sign Language translation. Creators who fail to do so, must be penalized and those who follow the guidelines must be incentivized or given tax-write-offs. To encourage accessibility in entertainment, content must not be allowed to release without Indian Sign Language interpretation.
- M/o Information and Broadcasting will issue guidelines to all broadcasters to conform to the accessibility standards while broadcasting their programmes. Deaf experts must be included in committees while making guidelines. Thus, upholding the slogan 'Nothing About Us Without Us', of inclusion of PWDs in decision making process by the governments. The M/o Information and Broadcasting should create a 24/7 ISL accessible channel where news, entertainment and educational programmes are accessible in ISL and closed captions are made available round the clock.
- All the concerned Ministries/Departments will issue guidelines containing the accessibility standards in respect of the facilities and services being covered under their domain in a time bound manner. Ministries/Departments must conduct regular follow ups and check whether the guidelines are being implemented. Violators must be penalized within fixed timelines.
- The domain regulators such as Real Estate Regulatory Authorities (RERA) in respect of public buildings and the Telecom Regulatory Authority of India (TRAI) in respect of telecommunications will be

responsible for ensuring compliance of these standards. Such Ministries/Departments where there is no specific domain regulator will be responsible to develop mechanism to ensure compliance of these standards.

- MoRTH will issue necessary guidelines for making modification in the personal vehicles being used by persons with disabilities as per requirement.
- Use of sign language interpretation in meetings being organized by States/UTs and another Ministries/Department should be mandatory. The guidelines and ethics of Indian Sign Language interpreting and the procedures for certifying the interpreters must be created and adopted by a team of Deaf experts in ISLRTC. ISLRTC must also provide specialized training for Indian Sign Language interpreting in Legal, Academic, Medical and other fields through short courses. A committee of Deaf experts must be constituted to monitor and carry out the selection / certification process. Violation of the guidelines must result in penalization. A disciplinary committee of Deaf experts should be created for such penalization. The committee must regularly inspect the interpreter. If they are found to be subpar, their certification should be revoked. A Deaf Interpreter / Deaf Communication Support along with the Hearing Interpreter to be made available to aid in the translation process. Awareness related to the interpreting process needs to be provided to all stakeholders i.e. police officers, lawyers, judges and interpreters so that accurate interpretation is recorded without any manipulation or influence.

- **Emergency helpline for Deaf:** Deaf people can access police/hospital/women helpline via video calls through interpreters in case of emergencies.
- **Accessible Information & Announcements:** All important announcements by Ministries to be translated in ISL and Interpreter to be present for important Live speeches (RPWD Act, CHAPTER VIII Duties and Responsibilities of Appropriate Governments, 42)
- **All-important government policies** to be made accessible to PwDs and to be translated in ISL along with closed captions.

- **Specialised Trainings for Sign Language Interpreting in Legal, Academic, Medical and other fields through short courses to be developed by ISLRTC.**
- **Provision of Indian Sign Language Interpreters** to be made for court cases at District level. (RPWD Act, Point 12 – Access to Justice). A pool of interpreters to be designated and advanced training in legal terms. In case there are any issues understanding the deaf person due to lack of sign language skills, a Deaf Interpreter / Deaf Communication Support along with the Hearing Interpreter to be made available to aid in the translation process. Awareness related to the interpreting process needs to be provided to all stakeholders i.e. police officers, lawyers, judges and interpreters so that accurate interpretation is recorded without any manipulation or influence, interpreters are not treated as witnesses and in case of unavailability of one interpreter, any other interpreter who is available is allowed to take up the assignment.
- **Accessible websites and documents:** All government websites and Apps to also have the Indian Sign Language accessible videos along with closed captions.
- **Awareness, Sensitization and Basic Indian Sign Language training in all departments with public dealings.** (RPWD Chapter VIII, 39)
- **Indian Sign Language Accessible TV channel:** At least one 24/7 ISL accessible channel where news, entertainment and educational programmes accessible in ISL and closed captions are made available round the clock.

Women with Disabilities

1. Awareness content related to Health and Hygiene, Gender, Puberty, Abuse, Sex & Pregnancy to be made Indian Sign Language accessible for PwDs especially women (2.2). Teacher and Parent training.
2. Emergency helplines including CHILDLINE (1098) and Women Helpline to be made accessible for deaf children for text and sign language video calling facility. Creating a pool of counsellors who are skilled in Indian Sign Language in each district.
3. Anganwadi and ASHA workers - Women with Disabilities (12.2.2) Periodical evaluation of the community level sensitization - 3 months
4. Accessible versions of the Acts (including ISL translation) such as POSH, POCSO Act to be shared online by DEPwD and relevant department websites

5. Online complaints to be made ISL accessible - NCW, NCPCR, Cyber Complaint. The national and state level commissions will ensure accessible trainings and awareness campaigns for women with disabilities.
6. Specific Schemes & Scholarships to encourage more women with disabilities to get education & employment.
7. Awareness sessions with women with disabilities about their legal rights against any kind of abuse and exploitation
8. Special Skill training and certification for women with disabilities
9. Hostels and Residential Training facilities for Women with Disabilities who are facing abuse or violence at home

Chapter 11.4

Art 28 of UNCRPD mandates access, particularly to women and girls with disabilities and older persons with disabilities, to social protection programs and poverty reduction programs

- Recommendation
 - Specification of post which is entailed with the responsibility of social security
 - Procedure to be mentioned regarding such programs
 - Programs should be ISL accessible

Chapter 11.6

RPWD Act Social Security Measures (Inter alia)

Facilities for PwDs/CwDs who have no family or are abandoned or are without shelter or livelihood support to women with disabilities for livelihood and upbringing of their children

- Recommendations
 - Hostels and Residential Training facilities for Women with Disabilities who are facing abuse or violence at home
 - Adoption laws such as JJ Act should be made ISL accessible

Chapter 12.2.2

Ministry of Women and Child Development – Support services through Aanganwadi network

Recommendations

Should include at least two Deaf women as Anganwadi and ASHA workers with ISL interpreters

Chapter 13.2 Offences and Penalties –

(d) Exploiting child and women with disability sexually

(f) Conducting medical procedure on a woman with disability leading to termination of pregnancy without her express consent.

13.5 Grievance Redressal

- On receipt of the complaints by the office of CCPD, action should be initiated within a week. The respondent authorities should be given maximum of one month to reply and in no case, it should go beyond two months.
- Personal hearing, if need be, should be completed within three months on receipt of complaint.
- Conduct sensitizing workshop for District/State authority periodically
- State should start online hearing at the earliest possible time.
- There should be a common online platform for registering of complaint by PwDs and the system will automatically forward to Chief Commissioner for Persons with Disabilities (CCPD) and respective State Commissioner based on the nature of the complaint. Further the system should enable to monitor follow-up action by the respondent authority. Individual Departments of all States/UTs should be given restricted access to view the record available and also explore the action taken. The complainant should also be given restricted access to view the status of complaint and status of implementation of CCPD or State Commissioner with respect to his complaint
- The National Legal Aid and State Legal Aid Authority need to develop schemes and programs for PwDs for enabling them access to justice.
- The Executive Magistrate may be designated in every district to deal with matters relating to violence abuse and exploitation of PwDs. The Executive Magistrate and the Police Officer should be given orientation training about the rights of PwDs and their role and responsibility to protect their rights. Refresher training program should also be held every three years.
- Recommendations:
 - Awareness and Indian Sign Language trainings for the Children Welfare Committee (CWC) National Commission for women

(NCW) and National Commission Protect Children Rights (NCPCR) as well as state commissions (3.1.4)

- Awareness sessions with women with disabilities about their legal rights against any kind of abuse and exploitation
- Online complaints to be made Indian Sign Language accessible - NCW, NCPCR, Cyber Complaint. The national and state level commissions will ensure accessible trainings and awareness campaigns for women with disabilities.