

POLICY BRIEF

Adapting National Policies for Disability Inclusion in Pakistan



**EMPLOYERS'
FEDERATION
OF PAKISTAN**
The Apex Body of Employers



**PAKISTAN
BUSINESS &
DISABILITY
NETWORK**

2024

EXECUTIVE SUMMARY

The policy brief addresses the significant gaps in Pakistan's SME Policy 2021, National TVET Policy 2018, and the Prime Minister's Youth Programme in meeting the needs of persons with disabilities. By analyzing these policies through a lens of inclusivity, the brief highlights the urgent need for systemic reforms to promote disability inclusion in economic opportunities, skill development, and entrepreneurial support.

The methodology involved a multi-stakeholder analysis, including insights from the National Multi-Stakeholder Roundtable Discussion, which gathered employers, disability organizations, and government representatives to assess policy gaps.

Key recommendations include developing a disability inclusion action plan, ensuring physical accessibility in TVET and SME facilities, incentivizing disability-led startups, and embedding inclusive communication in the Prime Minister's Youth Programme. Special focus is placed on supporting youth and women with disabilities to enhance their skills and employability. These actions aim to create equitable opportunities, foster a more inclusive workforce, and advance Pakistan's human rights and development goals.

This policy brief aims to guide the following:

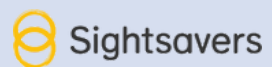
- Federal and Provincial Vocational technical and training authorities and regulatory bodies, including training institutions.
- National and provincial TVET institutions
- Private-sector and organizations working for people with disabilities.
- National, regional, and sectorial business and employers' associations and civil society organizations.
- Provincial government relevant departments and authorities working on disability inclusion including the Ministry of Human Rights, Ministry of Federal Education and Professional Training, and Ministry of Industries and Production.

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Key Partners



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BACKGROUND

Introduction

Pakistan is home to approximately 27 million persons living with disabilities, which is a significant most underrepresented portion of the country's population[1]. Despite Pakistan's commitments to international frameworks like the UN Convention on the Rights of Persons with Disabilities (CRPD) and the Sustainable Development Goals (SDGs), which stress inclusivity, persons with disabilities continue to face numerous barriers to accessing education, technical training, and economic opportunities.

While progress has been made with the enforcement of provincial laws including the Disability Rights Act in 2022 and the establishment of the Department of Empowerment of Persons with Disabilities (DEPD) in Sindh in 2018, implementation and monitoring of these initiatives remain weak. Cultural and systemic barriers persist, hindering persons with disabilities equal participation in education, training, and employment.

Persistent cultural and systemic barriers limit equal participation for persons with disabilities in education, training, and employment.

Factors like inaccessible infrastructure, lack of inclusive curricula in training institutions, inadequate workplace accommodations, and a lack of integration in socio-economic planning all contribute to high rates of unemployment and underemployment within this demographic.

Moreover, provincial laws have allocated job quotas for persons with disabilities, however, still a small fraction of persons with disabilities have been employed in the public and private sectors, and according to the 2022 Pakistan Journal of Neurological Sciences (PJNS) report[2], the implementation of the quota remains unsatisfactory and challenging, and citing an estimate from the World Bank, around 71 percent of persons with disabilities remain unemployed[3].

Human Rights Watch[4] highlighted the need for further legal and policy reforms to ensure alignment with Pakistan's international human rights obligations.

The SME Policy 2021, National TVET Policy 2018, and Prime Minister's Youth Programme play crucial roles in promoting economic opportunities, skills development, and entrepreneurship for youth. However, these policies lack provisions addressing the unique challenges faced by persons with disabilities, thereby excluding them from many of the opportunities these programs aim to foster.

[1] Ministry of Human Rights, Government of Pakistan

[2] <https://ecommons.aku.edu/cgi/viewcontent.cgi?article=1560&context=pjns>

[3] <https://www.fairplanet.org/story/pakistan-persons-with-disabilities-demand-true-inclusion/>

[4] <https://hrw.org/news/2020/08/27/landmark-ruling-bolsters-disability-rights-pakistan>

Rationale

Recognizing the United Nations Universal Declaration of Human Rights[5] and the International Covenants on Human Rights[6] that - everyone is entitled to all the rights and freedoms set forth therein, without distinction of any kind – reaffirm the universality, indivisibility, interdependence, and interrelatedness of all human rights and fundamental freedoms and the need for persons with disabilities to be guaranteed their full employment without discrimination.

The Agenda 2030 and its Sustainable Development Goals advocate for ‘Leave no one behind’ with specific goals and their targets setting standards and goals for equal opportunities and accessibility for persons with disabilities[7]. The United Nations Convention on the Rights of Persons with Disabilities (CRPD) outlines the rights of individuals with disabilities. As of 2022, 184 out of 190 countries and territories have ratified the CRPD, including Pakistan in 2011, which legally binds to uphold and protect these rights[8].

The International Labour Organization (ILO) Convention also adopts international standards for persons with various disabilities for employment and integration into the community. Convention C159 on Vocational Rehabilitation and Employment (Disabled Persons) 1983[9], Convention C100 on Equal Remuneration Convention, 1951[10], and Convention C111 on Discrimination (Employment and Occupation) Convention, 1958[11] are instrumental in setting standards for disability inclusion.

Pakistan has several laws and policies to protect and promote the rights of persons with disabilities, including the Disability Rights Act of 2022, which provides a comprehensive legal framework. Following Pakistan's ratification of the UNCRPD in 2011, each province developed its own disability act aligned with these principles. While this legislative progress is significant, challenges in implementation remain, largely due to limited understanding of the issues involved and insufficient collaboration among public and private stakeholders.

Inclusion of persons with disabilities is both a legal obligation and a moral commitment, reinforced by national and international frameworks. Beyond compliance, it has become a business imperative, driven by growing demand from international buyers and aligned with responsible business practices.

Therefore, this policy brief responds to the gaps and challenges in its implementation, presenting insights from the National Multi-Stakeholder Roundtable Discussions on the SME Policy 2021, National TVET Policy 2018, and the Prime Minister's Youth Programme.

[5] <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

[6] [International Covenant on Civil and Political Rights](#)

[7] [Ensure Inclusive and Equitable Quality Education and Promote Lifelong Learning Opportunities for All](#)

[8] [Convention on the Rights of Persons with Disabilities \(CRPD\)](#)

[9] [C159 - Vocational Rehabilitation and Employment \(Disabled Persons\) Convention, 1983](#)

[10] [C100 - Equal Remuneration Convention, 1951](#)

[11] [C111 - Discrimination \(Employment and Occupation\) Convention, 1958](#)

Scope and Approach

This policy brief is an outcome of the Employers' Federation of Pakistan's First Roundtable Meeting on Disability Inclusion, supported by Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ Pakistan, Sightsavers Pakistan, and International Labour Organization (ILO) in its ongoing effort to promote creation of decent jobs and skills development that are inclusive of persons with disabilities.

The meeting brought together key stakeholders, including employers, representatives from organizations working for persons with disabilities, and government officials to review and discuss the following:

- A Technical and Vocational Education and Training (TVET) Policy for Pakistan 2018, Ministry of Federal Education and Professional Training, Government of Pakistan[12].
- National SME Policy 2021, Small and Medium Enterprises Development Authority (SMEDA), Ministry of Industries and Production, Government of Pakistan[13].
- Prime Minister's Youth Programme (Kamyab Jawan Program)[14].

The discussion commenced with brief presentations providing an overview of the policies and programs. These were followed by a roundtable dialogue aimed at identifying the gaps and outlining priority actions to enhance these policies, making them more inclusive and responsive to the needs of persons with disabilities.

This policy brief thoroughly examines the aforementioned policies and programs, presenting targeted recommendations that advocate for reforms for a more inclusive economic environment for persons with disabilities in Pakistan.

The brief aims to:

- Identify priority actions to advance disability inclusion in the labor market;
- Propose necessary reforms in the TVET Policy and SME Policy, and ensure that the Prime Minister's Youth Programme (PMYP) better meets the needs and protects the rights of persons with disabilities;
- Reaffirm Pakistan's international commitment to support vulnerable groups—including women and youth with disabilities—by addressing poverty, inequality, climate change, and health, upholding the promise to leave no one behind.

[12] https://psda.punjab.gov.pk/system/files/TVET%20Policy%202018_0.pdf

[13] https://smeda.org/index.php?option=com_phocadownload&view=category&download=1824:sme-policy-2021&id=46:smeda-publications&Itemid=1270

[14] <https://pmyp.gov.pk/>

DISCUSSIONS

This section discusses findings and recommendations from roundtable discussions on the three policies and programs and provides recommendations on necessary reforms that can ensure a more inclusive and equitable economic landscape driving meaningful changes in policy frameworks and operational practices across federal, provincial, and institutional levels.



TVET POLICY FOR PAKISTAN 2018

The Technical and Vocational Education and Training (TVET) Policy of Pakistan is designed to build a skilled workforce by offering technical and vocational training to individuals across the country. The policy seeks to bridge the skills gap in various industries by aligning education and training systems with market demands, ultimately improving employability and contributing to economic growth.

However, the policy's provisions for persons with disabilities remain limited. While the TVET policy sets forth broad goals for workforce development, it lacks specific frameworks and targeted provisions to ensure that persons with disabilities receive adequate support and are fully integrated into the training system. This has created barriers to accessibility, limiting the opportunities for persons with disabilities to benefit from vocational and technical education and posing significant challenges to their employability.

In recent years, some commendable initiatives have been launched, particularly in Sindh. The Sindh Chief Minister's initiative led to the establishment of a Vocational Training Centre specifically for persons with disabilities, enrolling 240 students (including 120 girls) in various fields such as computer science, tailoring, and mobile repair. Additionally, Sindh TVET has partnered with Deaf Reach to provide dedicated training facilities for persons with hearing impairments in Karachi and Sukkur, where state-of-the-art facilities serve over 1,500 students. However, these programs mainly offer basic-level training focused on entry-level employment.

Gaps and Challenges

- **Inadequate Policy Framework:** Lacks inclusivity with no specific objectives, adapted curriculum, assistive technologies, or monitoring systems for persons with disabilities.
- **Physical Accessibility:** The policy does not address accessibility in TVET institutions, resulting in inadequate infrastructure, such as ramps and accessible facilities, which limits access to training for persons with disabilities.
- **Untrained Teaching Staff:** No provisions for staff training in inclusive methods to support disability-specific needs.
- **Weak Support System:** Lacks disability-friendly communication, career counseling, and guidance on program options for persons with disabilities.
- **Data Gaps:** No consolidated data to assess specific skills and training needs, affecting alignment with industry requirements.
- **Limited Industry Engagement:** Lacks structured collaboration with industry, leading to a mismatch between training and job market needs.
- **Lack of Monitoring and Evaluation:** Weak M&E framework, especially on disability inclusion, hindering assessment and improvement.

Recommendations

- **Accessibility Standards:** Implement clear guidelines to ensure that all TVET institutes are physically accessible to persons with disabilities. This includes ramps, accessible washrooms, assistive technologies, and accommodations for different types of disabilities e.g. physical, mental, intellectual and sensory.
- **Advanced Education and Vocational Support:** Upgrading programs, including diplomas and postgraduate training, is essential to support persons with disabilities in accessing advanced workforce roles. Additionally, vocational guidance and career counseling should be introduced to provide the necessary encouragement and direction for full participation in skills development programs.
- **Dedicated Human Resources:** TVET institutions should employ a specialized staff who must be aware of disability-inclusive standards and practices. Their role is crucial in building the institute's capacity to deliver truly inclusive education.
- **Accessible Communication and Guidance:** Persons with disabilities need specialized ways to receive program information and career advice. TVET institutes must use disability-friendly communication methods, such as sign language interpretation, Braille materials, and SMS or audio messaging services, and provide targeted career counseling to help students understand their training options and career paths.
- **Teacher Training Programs:** Introduce mandatory training programs for teachers and trainers on inclusive education certification programs. This will help build a more supportive environment for persons with disabilities in TVET institutes.
- **Data Collection and Management:** Establish a consolidated database of persons with disabilities, including their skills, training needs, and employment opportunities. This will help align TVET programs with the industry demand for specific skills of persons with disabilities.
- **Private Sector Mandates:** Introduce regulations and incentives for private sector companies in disability inclusion in training and employment programs. This can be achieved by linking industry involvement to corporate social responsibility (CSR) initiatives or by creating financial incentives for inclusive hiring.
- **Task Force for Implementation:** This task force will ensure that TVET institutions are disability-friendly and oversee the rollout of accessible programs. It will include representatives from persons with disabilities, employers, industry experts, and government bodies to ensure thorough and effective implementation.

PRIME MINISTER YOUTH PROGRAMME

The Prime Minister's Youth Programme (PMYP) aims to uplift Pakistan's youth socio-economically through four pillars: Employment, Education, Engagement, and Environment. The program provides financial support, skill development, and job placement opportunities to empower youth, focusing on increasing access to employment, education, and leadership roles. Its mission is to reduce unemployment, promote digital literacy, and enhance vocational skills, with specific objectives like boosting women's labor force participation and addressing youth not in education, employment, or training (NEET).

However, persons with disabilities are largely excluded from these initiatives. Despite the substantial size of this demographic in Pakistan, they face significant barriers in accessing these programs, limiting their opportunities for economic participation and social development. To achieve inclusive youth empowerment, it is crucial to integrate persons with disabilities into the PMYP framework, ensuring they have equal access to training, employment, and support.

In 2014, Prime Minister Nawaz Sharif announced a provincial quota of 5% for the disabled and special persons in the Youth Business Loan Scheme (Dunya News)[15], marking a significant step toward financial inclusion. However, this quota has since been replaced with a merit-based approach, aiming to foster inclusivity based on qualifications and skills. While SMEDA (Small and Medium Enterprises Development Authority) and participating banks have been tasked with facilitating applications, several critical challenges persist including physical accessibility, and information and communication barriers.

Gaps and Challenges

- **Nonrepresentation of Persons with Disabilities:** There is a lack of representation of persons with disabilities in the programme formulation and implementation processes.
- **Limited Awareness and Sensitization:** There is a general lack of awareness and sensitivity towards the needs of persons with disabilities among program implementers and collaborators.
- **Information Access:** Current communication channels and materials aren't fully accessible to persons with various disabilities. Program information isn't consistently available in formats like Braille or sign language, and online platforms often lack accessibility features.
- **Inadequate Data Collection:** There is insufficient data on the number of youth with disabilities, their specific needs, and the barriers they face in employment, which hampers effective policy formulation and implementation.

<https://dunyanews.tv/en/Pakistan/207937-5-percent-quota-for-disabled-persons-in-Youth-Busi>

Recommendations

- **Representation in National Youth Council:** Include young persons with disabilities in the National Youth Council, which serves as an advisory body to the Prime Minister. This ensures that their perspectives and needs are considered in policy-making processes, promoting more inclusive and effective policies.
- **Partnership with Organizations of Persons with disabilities:** Collaborate with disability organizations to ensure their needs are met. These partnerships can provide valuable insights and resources, helping to tailor programs and initiatives to be more inclusive and supportive of persons with disabilities.
- **Implementation of Existing Disability Acts and Legislations:** Enforce existing laws and policies, such as the State Bank's accessibility policy, ILO conventions, disability acts, and the Constitution of Pakistan. This ensures that the rights of persons with disabilities are protected and promoted across all PMYP initiatives.
- **Digital Accessibility Standards:** Transform the PMYP's website & all digital platforms to comply with international accessibility standards. This involves features like screen readers, voice navigation, font increase facilities and high-contrast themes for easier access throughout the program data and application process to make sure that all details of programs are accessible to persons with various disabilities.
- **Inclusive Communication Strategy:** Develop a comprehensive media and communication approach representing disability inclusion across all PMYP channels. This includes creating content in accessible formats, featuring success stories of entrepreneurs with disabilities, and ensuring all promotional materials include sign language interpretation and closed captions.
- **Employment of Disability Experts:** Hire disability experts within the PMYP to guide and implement inclusive practices. These experts can provide specialized knowledge and support to ensure that all aspects of the program are accessible and inclusive.
- **Comprehensive Data Collection:** Implement robust data collection mechanisms to gather detailed information on youth with disabilities, their needs, and challenges. Accurate data is essential for effective policy formulation and targeted interventions.
- **Utilize UNCRPD Monitoring Mechanism:** The PMYP should be evaluated using the UNCRPD's existing monitoring mechanism. This will ensure that the program aligns with international standards and best practices for disability inclusion.
- **Provision of assistive technologies:** Ensure the availability and provision of assistive technologies such as screen readers, hearing aids, and mobility devices. These technologies can significantly enhance the ability of persons with sensory disabilities to participate in employment.

SME POLICY 2021

The SME Policy 2021 is a set of recommendations to support SME growth to trigger SME-led private sector growth, recognizing their critical role in economic development and job creation. It outlines strategies to enhance the competitiveness of SMEs, streamline regulations, and facilitate innovation and entrepreneurship by providing a conducive environment for business expansion, access to finance, capacity building, and market access.

The SME Policy 2021 features several key initiatives aimed at fostering the growth of small and medium enterprises. It focuses on reducing regulatory burdens by simplifying laws and regulations, improving access to finance through targeted financial products, expanding credit guarantee schemes, and offering collateral-free loans. The policy encourages technology adoption and innovation while establishing SME support centers and also prioritizes skills enhancement in the SME sector through vocational training and alignment of educational programs with industry needs.

Additionally, the SME Policy provides preferential treatment for women-owned businesses, including simplified tax procedures and reduced tax rates to support their growth. However, it does not specifically mention provisions for women-owned SMEs with disabilities, leaving a gap in targeted support for this group.

However, despite its comprehensive approach, the policy lacks specific provisions for disability inclusion, limiting the ability of persons with disabilities to benefit from these initiatives and participate fully in the SME sector.

Gaps and Challenges

- **Limited Policy Recognition:** The policy does not specifically acknowledge persons with disabilities as potential entrepreneurs or SME owners, missing a valuable demographic.
- **Limited Access to Credit:** Financial institutions often perceive entrepreneurs with disabilities as high-risk, leading to stricter loan conditions or outright rejections.
- **Financial Constraints:** Persons with disabilities face higher transaction costs and financial requirements, with banks hesitant to lend due to misconceptions about repayment capacity and the need for expensive adaptations.
- **Inaccessible Financial Services:** Financial institutions lack disability-friendly infrastructure and accessible online services, limiting engagement for persons with disabilities.
- **Regulatory Barriers:** The policy's goal of regulatory simplification does not include specific accommodations for persons with disabilities in the registration and compliance process.
- **Technology and Innovation Gaps:** While promoting technology adoption, the policy does not consider assistive technologies that could help persons with disabilities participate in the SME sector.

Recommendations

- **Develop a Disability Inclusion Action Plan:**

Create a dedicated action plan that outlines specific steps for integrating persons with disabilities into the SME sector, including targeted programs for entrepreneurship, vocational training, and financial literacy.

- **Introduce Quotas for Disability-Led Startups:**

Set up quotas or incentives for startups led by persons with disabilities, encouraging entrepreneurial growth among this demographic and fostering greater inclusivity in the SME ecosystem.

- **Introduce Accelerator Programs:** Launch targeted accelerator programs to support aspiring entrepreneurs, especially women and persons with disabilities, by providing mentorship, funding, and resources. One example is Deaf Tawk's Innovation Challenge Futuremakers, which empowers persons with disabilities by fostering their entrepreneurial skills and helping them achieve their business goals.

- **Accessible Financial Services:** Encourage financial institutions to make their services accessible by introducing disability-friendly infrastructure (e.g., ramps, Braille materials, sign language support, and accessible online platforms) and providing staff training to better serve persons with disabilities.

- **Ease of Access to Finance:** Simplify the process of accessing finance for entrepreneurs with disabilities by reducing collateral requirements, offering targeted financial products, and expanding credit guarantee schemes to support them.

- **Regulatory Simplification:** Ensure that the regulatory processes are accessible for persons with disabilities by providing user-friendly digital platforms (e.g., SECP registration process) and offering specialized support to help entrepreneurs with disabilities navigate business registration and compliance.

- **Incentivize Companies Hiring Persons with Disabilities:** Offer preferential treatment or incentives (such as tax relief or subsidies) to SMEs that actively hire and engage persons with disabilities in their workforce, encouraging diversity and inclusion.

- **Promote Assistive Technologies:** Encourage innovation in assistive technologies that can enhance the productivity and involvement of persons with disabilities in the SME sector, enabling them to manage businesses effectively and participate in the digital economy.

KEY OVERARCHING LIMITATIONS

This section highlights common limitations across all three policies/programs. Key actions and policy reforms are essential to ensure persons with disabilities are central to all efforts, actively involved in planning and implementation, and protected through inclusive measures.

Policy Framework and Governance Gaps

Policies must ensure that persons with disabilities are recognized as a distinct group requiring tailored interventions. Disability-related considerations should be integrated across all frameworks, rather than being isolated mentions, to effectively address their specific needs.

Access and Participation Barriers

There is a need to improve provisions for accessible information formats across programs. Core PMYP initiatives, such as Skills Development and Business Loans, should be adapted to ensure they meet the needs of persons with disabilities. Moreover, the consideration of assistive technology needs, particularly in TVET and SME sectors, must be enhanced. Procedures must be simplified and accommodations should be developed to ensure accessibility for individuals with diverse disabilities.

Resource and Capacity Constraints

A dedicated budget for disability inclusion must be established across all policies. Provisions for disability-specific support services should be improved, and there is a need to develop institutional capacity to better support disability inclusion, ensuring that policies are effectively implemented.

Monitoring and Stakeholder Engagement

It is essential to establish systematic mechanisms for evaluating the impact of policies on disability inclusion. Disability-specific indicators should be developed within monitoring frameworks, and inclusive channels for feedback from persons with disabilities should be created to ensure their meaningful engagement in the policy development and evaluation process.

Intersectionality and Disability Inclusion

Persons with disabilities often face compounded discrimination due to intersecting factors such as gender, age, ethnicity, race, sexual orientation, socio-economic status, and geographical location. These overlapping barriers disproportionately impact the most marginalized groups, including women, youth, rural populations, and ethnic minorities with disabilities. Policies must not only address disability in isolation but also recognize how these intersecting factors affect access to opportunities and services.

Ensure Meaningful Participation at all stages

Governments, private sector, international donors, civil society organizations, and Organizations for Persons with Disabilities must actively engage persons with disabilities at every stage of the policy/program design. This includes promoting, funding, and monitoring their inclusion in the design, implementation, and evaluation of initiatives, ensuring their needs are effectively addressed throughout the process.

END NOTES

Pakistan Business and Disability Network (PBDN) of Employers' Federation of Pakistan through this Policy Brief, establishes a bold vision and practical set of recommendations, outlining programmatic and organizational strategies and investments needed to deliver it. It is the commitment of the members and stakeholders of the PBDN to call for greater cross-sectoral and intergovernmental coordination to scale up action and accelerate results. It calls for disability inclusion mainstreamed across every level and meets the needs of people, especially youth, with various disabilities.

We must all take equal responsibility for making disability inclusion part of our every work and world, actively and in everything we do.

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