

**31st session of the UN Committee on the Rights of  
Persons with Disabilities  
(27 January 2025)**

**Civil Society's written contribution for the review of the  
Republic of Namibia**

**March, 2025**

**About the authors:**

This submission was prepared by the **National Federation of Persons with Disabilities in Namibia**, led by Matheus Shishiveni Hashoongo Chairperson, OPD leaders, and support from Mr. Juan Ignacio Perez Bello from the **International Disability Alliance**.

## Abbreviations and Acronyms

NAPA	Namibia Association of People with Albnism
AAN	Autism Association of Namibia
DSN	Downs Syndrome Namibia
EEC	Employment Equity Commission
EF	Epilepsy Foundation
HRAP	Human Rights Action Plan
IDA	International Disability Alliance
ILO	International Labour Organisation
MHA	Mental Health Association
MGEPEWSW	Ministry of Gender Equality Poverty Eradication and Social Welfare
MoHSS	Ministry of Health and Social Services
NACD	Namibian Association of Children with Disabilities
NADAW	Namibian Association of Differently Abled Women
NANASO	Namibian Network of AIDS Service Organisations
NAPPD	Namibian Association of Persons with Physical Disabilities
NDCN	National Disability Council of Namibia
NFPDN	National Federation of People with Disabilities in Namibia
NFVI	Namibian Federation of the Visually Impaired
NNAD	Namibian National Association of the Deaf
NOYD	Namibian Organisation of Youth with Disabilities
NAWCU	Namibian Association of Wheelchair Users
OPD	Organisation of Persons with Disabilities
PWD	Persons with Disabilities
UNAM	University of Namibia
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
UNFPA	United Nations Population Fund
WAD	Women Action for Development
WHO	World Health Organisation

## **Acknowledgements**

We would like to extend our heartfelt gratitude to all individuals and organizations who contributed to the production of this shadow report. Their invaluable insights, dedication, and commitment to improving the lives of persons with disabilities in Namibia have been instrumental in this effort.

NFPDN is an umbrella organization advocating for the protection of the rights of persons with disabilities in Namibia. Over the years, NFPDN has executed numerous projects aimed at ensuring sustainable development, access to education, healthcare, training, employment, and access to public facilities for persons with disabilities.

IDA is a global network of organizations of persons with disabilities (DPOs) and their families. The IDA works to promote the effective and full implementation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) worldwide. The alliance advocates for inclusive social protection, humanitarian action, and disaster risk reduction, ensuring that the rights of persons with disabilities are respected and upheld globally.

Lastly, we acknowledge the support rendered by the membership and Executive Committee of the National Federation of People with Disabilities in Namibia (NFPDN) and the International Disability Alliance (IDA) to the development and technical support of this report.

Matheus Hashoongo

Chairperson, National Executive Committee

National Federation of People with Disabilities in Namibia (NFPDN)

## **Executive summary**

Namibia has a population of 3,061,410 people, making it one of the least densely populated countries in the world. According to the latest data census 2023 indicate that, there are 108,992 persons with disabilities of which identified by the Washington Group of Questions not yet recorded, representing 4.7% of the population. Most of the enumerators received training of which was not inclusive which makes enumerators have limited understanding on WGQ which caused inaccuracy of data presented. The proportion of men and women with disabilities remains nearly equal, with 4.6% of women and 4.8% of men identified as persons with disabilities.

Approximately 21% of Namibians with disabilities are affected by hearing impairments, 35% with visual impairments, 11% with speech and communication impairments, 37% with physical impairments, and 5% with developmental or intellectual impairments. These figures are relatively low compared to global data on disability.

In 2020, Namibia submitted its combined initial, 1st to 6th State Report to the treaty body, providing a comprehensive update on the progress in the implementation of the UNCRPD. Organisations of persons with disabilities 2024/2025, through their representative bodies such as NFPDN, conducted nationwide consultations to gather the reactions and experiences of persons with disabilities on the State Report.

The findings of this report highlight the extent to which policy and legislative reforms have advanced the country's realization of the rights of persons with disabilities. Despite high-level attention to disability mainstreaming through the Office of the Vice President, the situation of persons with disabilities, especially women and children, remains inadequate, with access to social services being a top area of need.

## **Review of the state implementation of the Convention**

### **Article 1-4**

The National Disability Council Act, 2004 (Act No. 26 Of 2004) defines "disability" as a "physical, mental or sensory impairment that alone, or in combination with social or environmental barriers, affects the ability of the person concerned to take part in educational, vocational, or recreational activities."

OPDs are still recommending on harmonising the disability word aligning with Namibian constitution as there is no evidence on harmonise disability word definitions across policies and legislation at the time of writing this report. The State Report acknowledges three different definitions of disability. In addition, the National Pensions Act has its own definition used to determine eligibility for the disability grant, which the disability community suffers discrimination as some disabilities are not recognised under this act.

OPDs acknowledge the State party efforts on proposing the National Disability Act, the Guideline on Degree of Disablement by the Ministry of Health and Social Services and National Disability Council of Namibia we presume this might be addressed as the processes of consultation begins.

The National Policy on Disability of 1997 outlines the responsibility of the Ministry of Health and Social Services to contribute to the prevention and rehabilitation of disability. The responsibility is distributed between the Directorate of Social Services and the Division of Disability Prevention and Rehabilitation under the Ministry of Health. This placement promotes the perception of disability from a medical model perspective. This is concerning to the disability community in Namibia in that almost all disability related affairs are coordinated by the Ministry of Health under the Directorate of Social Services and the Division of Disability Prevention and Rehabilitation. The aspect of viewing disability from the wider social and human rights models is by implication not existing within the Ministry of Health mandates.

Namibia still has legislation in force that violates the rights of persons with disabilities such as Electoral Commissions of Namibia Act 5 of 2014 - Chapter 2 Article 6 (4), Article 17 (5 (vi)), Article 18 (4) (a, vi) and Article 22, (2) (c) and immigrations Control Act 7 of Namibia 1993.

We recommend amendments to align with each UNCRPD article 4(3) and the Leave No One Behind principle.

The disability community in Namibia calls upon the UNCRPD Committee to inquire from the State Party on the following:

1. When will Namibia adopt a standard definition of disability that complies fully with the spirit of the CRPD given that various Acts and policies define disability in different ways?
2. How does the State or will the State ensure that the process for determining disability is inclusive and accessible to all individuals, including those with different (lesser known and understood) types of disabilities and from diverse backgrounds?

### **Article 5: Non discrimination**

According to the State Report, Article 10 of the Namibian Constitution provides for the equality of all persons before the law and that no persons may be discriminated against on the grounds of sex, race, colour, ethnic origin, religion, creed or social economic status. This can be read with the provisions of the Racial Discrimination Prohibition Act, 1991 (Act No. 26 of 1991) which prohibits discrimination on racial grounds

The disability community in Namibia is concerned that disability is still not listed as a ground for prohibition of discrimination in Article 10 of the Constitution of Namibia. This gives freeway for discrimination on the basis of disability without any express protection by the Constitution from discrimination despite having legislation that recognises persons with disabilities as equal citizens of Namibia.

The Ombudsman proposed amendment to the Constitution to expand the grounds of discrimination in the Constitution. This was part of the HR Action Plan developed by the Ombudsman. The constitution does mention women / gender as a basis for discrimination but is silent on disability.

There is systemically discrimination by government, private sector and State-Owned Enterprises. NFPDN recorded that the National Disability Council of Namibia recorded the

least number of persons with disabilities in their workforce and critical position of the positions such as CEO and Legal are held by persons without disabilities, which raised serious public concerns on the integrity on the institution thus OPDs and PWDs find it difficult to access the legal services and support.

The state reports that NDCN can also represent the PWD in competent court but this hasn't materialised as most of individuals are turned back to acquire their own legal representative at their own cost. Ombudsman also fails to entertain cases of human right violation. On 2022 Mr X was employed by the company which was contracted by Omaruru Town council, Mr X was shocked by the high voltage power which caused him to suffer the spinal cord injuries, he become permanent disability and lost his work, the company and town council refused to compensate the victim till to date. The national broadcast tv recorded this story and it is available on YouTube and other media outlets. NFPDN recorded other case of a former police officer, who were detained due to misconduct during his official duty due to his mental condition. After he was released from the custody after 3 months, he was discharged from his duty on IWOL without being referred to social worker, neither medical boarding. As a consequence, he lost his family by divorce. The two institutions were approached for the appeal of the decision but no support offered by the state.

In report of the State Party (2020) acknowledges that there are a number of challenges to the application of Article 5 of the CRPD. These include poverty; limited resources for litigation; lack of information in the use of rightful entities with regards to reporting any rights violation; communication barriers; limited capacity of judiciary and court staff to deal with disability issues; inaccessible buildings and transport; court papers not available in braille or in a font size accommodative to persons with partial sight/visual impairment; and limited provision of sign language services for the Deaf.

As it is observed by PWD there is still no significant efforts have been taken to address these challenges from the view point other than the mere recognition that these are the problems encountered by most persons with disabilities.

The disability community in Namibia would like the Committee to inquire on the following:

3. What evidence exists to prove that persons with disabilities are able to use, and have used the law, to protect and pursue interests on an equal basis with others through the judiciary?

### **Recommendations**

1. Government must fund legal representation for PWDs in court cases to ensure they have access to justice without bearing the financial burden themselves. Additionally, it must improve the capacity of the Ombudsman to handle cases of human rights violations involving PWDs.
2. We propose regular monitoring and reporting on the progress of implementing these recommendations, involving PWDs and their representative organizations in the process to ensure accountability, accuracy, and transparency?

## **Article 6: Women with Disabilities**

According to the State Report, government has made a policy commitment to make sure that women with disabilities have equal opportunities to participate in all aspects of life equal to that of their fellow citizens by addressing the existing challenges through policy implementation and compliance monitoring. However, the disability community finds no evidence of specific provisions in the Combating of Domestic Violence Act, 2003 (Act No. 4 of 2003) and the Combating of Rape Act, 2000 (Act No. 8 of 2000) to address the specific challenges of women and girls with disabilities.

The state report does not mention anything on the sexual and reproductive rights of women with disabilities. Furthermore, there are no specific measures to protect the rights of women and girls with disabilities to enjoy the sexual and reproductive health rights, especially to retain their fertility and to enjoy the right to found families.

Women and girls with disabilities face serious challenges regarding gender-based violence (GBV). Those with mental health issues and deafness are particularly vulnerable to sexual exploitation. Additionally, women with disabilities often experience financial exploitation by their spouses and loved ones. The lack of effective reporting mechanisms, such as whistleblower systems, has further exacerbated this issue, as victims are often too fearful to report abuses due to threats to their safety.

The disability community acknowledges the fact that there has been very low participation of girls and women with disabilities in decision making and all matters affecting them at all levels. This concern was raised by 33 of 39 of women with disabilities who participated in the consultative process of developing this report.

The disability community would like the Committee to inquire and recommend on the following:

[To what extent do the measures outlined in the Combating of Domestic Violence Act, 2003 \(Act No. 4 of 2003\) and the Combating of Rape Act, 2000 \(Act No. 8 of 2000\), along with other state policies and laws, address the specific challenges faced by women and girls with disabilities? \(insuring that all types of disability are addressed\)](#)

## **Recommendations**

3. Develop and implement comprehensive policies and programs that protect and promote the sexual and reproductive health rights of women and girls with disabilities. This includes ensuring access to appropriate healthcare services, education on sexual and reproductive health, and safeguarding their rights to retain fertility and found families. These measures should be integrated into existing health policies and monitored for compliance.
4. Establish effective reporting mechanisms, such as confidential whistleblower systems, to empower women and girls with disabilities to report instances of abuse without fear of retribution. Additionally, create inclusive platforms and processes that actively involve women and girls with disabilities in decision-making at all levels, ensuring their voices are heard and their needs are addressed in policies and programs.

## **Article 7: Children with Disabilities**

The disability movement (Disability Grants recipient 61 616), 12.8%) further commends the government for increasing the disability grant from 13.64USD to 87.28USD per month. Despite the increase in disability grants, the adequacy of 87.28USD remains questionable in covering the full range of needs for children with disabilities, especially considering cost-of-living increases. The State party also introduced the Individual Support Programme to support children with severe disabilities such as Cerebral Palsy, wheelchair users, and those with developmental disabilities with portable showers, porridges, diapers, and other necessities.

The disability community would like the Committee to inquire from the State Party on the following:

4. [What legislative measures the state has taken, or shall take to ensure protection of the rights of children with disabilities who continue to be concealed within their homes or families without any form of intervention?](#)

## **Article 8: Awareness raising**

We recognize the efforts the Government of the Republic of Namibia has put forth in carrying out awareness-raising activities on disability issues as stated in the State Report. The disability community in Namibia observes that there was minimal awareness-raising around disability and the UNCRPD in the year 2010 as stated by the state. OPDs were trained on the UNCRPD in 2023 to enhance their knowledge and understanding. However, this awareness-raising did not cover all 14 regions of Namibia, especially rural areas. The awareness-raising did not comprehensively cover aspects of disability, such as positive attributes achieved by persons with disabilities to depict role models, negative practices affecting persons with disabilities, and specific messaging on the multiple discrimination and negative attitudes girls and women with disabilities, particularly on GBV, face in Namibia.

Disability community especially at rural areas are left out on the awareness campaigns, the state only support towns events.

There has been very little awareness-raising and training of media houses; thus, the media still faces difficulties in covering disability issues widely, positively, and in appropriate disability-friendly language.

Awareness-raising around the aspect of gender and disability, according to the disability community, has not been done among government departments, the private sector, civil society, and the media. Namibia has established the National Disability Forum to unify stakeholders with an interest in disability issues. The forum aims to promote and support government interventions on implementing policies, strategies, and programs to mainstream disability matters.

While the state report indicates that it has been creating awareness and promoting the principle of inclusive education, the disability community still believes this has been



inadequate and has not been practically translated into the implementation of inclusive education.

The disability community would like the committee to inquire from the state party on:

5. When the government will adequately fund the commemoration of National Albinism Day to increase awareness on the rights of persons with albinism?
6. How does the government plan to incorporate comprehensive, innovative and effective aspects of disability, such as positive role models and negative practices, into its awareness-raising campaigns?
7. To what extent the state, in cooperation with OPDs, will continuously train media houses on aspects of disability inclusion and gender in a more effective and sustainable manner to impact on the way they deliver sensitive and respectful messages to the public.
8. What steps are being implemented to ensure that girls and women with disabilities, particularly those facing GBV, are included in awareness-raising activities and support initiatives?

### **Article 9: Accessibility**

The disability community recognizes that the National Disability Policy of 1997 and the mandatory accessibility standards it foresaw. Yet, 27, the state years later, the mandatory standards and guidelines on accessibility not still approved by the cabinet for implementation. Meanwhile, public buildings and facilities remain highly inaccessible to different categories of persons with disabilities.

The disability community observes that the state has not availed information to the public in all accessible formats such braille, large print, electronic, sign language, and easy-to-read formats.

There is very little progress and no laws or policies in place to ensure universal accessibility for persons with disabilities. The country still uses old South Africa Bureau of Standards guidelines. NDCN did have a project for developing guidelines on accessibility, which would be a separate document, but the document does not have the force of law, and therefore legislative measures are needed. Accessibility standards need to be adopted as a law on its own and enforceable by planning authorities.

There is a lack of widespread infrastructural accessibility, such as the provision of elevators. This and other challenges persist when it comes to accessibility to physical structures.

The disability community in Namibia would like the UNCRP Committee to inquire from the State Party on the following:

9. How far the state, through the National Disability Council and relevant Ministries, has gone in repealing/ replacing/ updating the National Disability Council Act to incorporate the aspect of standards for accessibility in public buildings and facilities including transport, communication, technology, sports and recreation facilities. This should include the extent to which the state has ensured the provision of sign language interpretation on public and private television stations?

10. To what extent the state, in terms of number of mainstream schools, has provided computers installed with screen readers for visually impaired learners and sign language interpreters for learners with hearing impairments? The state should review the actual number of qualified sign language interpreters available in such mainstream schools and ensure adequate provision of interpreters.
11. What steps are being taken to ensure that critical information related to Gender-Based Violence, Sexual Reproductive Health, and Civic Education on political participation is provided and translated into accessible formats for persons with disabilities?

#### Recommendation

5. We suggest the state to launch public awareness campaigns and provide training for government officials, planners, architects, and builders on the importance of accessibility and the rights of persons with disabilities. This will foster a culture of inclusion and respect for human rights, ensuring that accessibility is considered a fundamental aspect of all development projects.

### **Article 10: Right to life**

During the consultative process, the disability movement expressed their desire for equal constitutional protection of their right to life. Furthermore, unlike in some African states, persons with albinism expressed no knowledge of any threat to their lives through ritual killings or body mutilations.

In 2010, the body of an albino man was discovered at Uuvudhiya village without private parts. In 2022, suspects were arrested for attempting to buy hair and nails from a man with albinism. The case is still with the judiciary, and some of the suspects, who are Zambian nationals, are suspected of being involved in cross-border organized crime.

In 2024, a short-statured man was raped and lost his life due to severe anal damage in Oshikango, Ohangwena region<sup>1</sup>. At Eembidi village in 2021, a man with Down syndrome was mutilated, and a body part was removed. These incidents<sup>2</sup> are quite threatening, as all the above-mentioned deaths are suspected to be ritual-related. The state holds this information from the public, especially the outcome of the investigations.

The Witchcraft Suppression Proclamation 27 of 1933 does not directly intervene in protecting persons with disabilities against ritual practices. The National Disability Council Act 26 of 2004 aims to advocate for the protection of persons with disabilities, but this act is silent on this critical issue.<sup>3</sup>

The disability community in Namibia would like the UNCRP Committee to inquire from the State Party on the following:

12. How does the state plan to address the gaps in the Witchcraft Suppression Proclamation 27 of 1933 and the National Disability Council Act 26 of 2004 to protect persons with disabilities from ritual practices?

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<sup>1</sup> <https://www.tiktok.com/discover/the-death-of-mateu-from-oshikango>

<sup>2</sup> <https://www.eaglefm.com.na/news/albinism-association-demands-no-bail-for-n1-million-albino-hair-suspects/?form=MG0AV3>

<sup>3</sup> <https://neweralive.na/people-with-albinism-gripped-by-fear/?form=MG0AV3>

13. What steps are being taken to prevent cross-border organized crime involving persons with disabilities, particularly those with albinism?
14. How is the state working with communities to raise awareness and prevent ritual-related violence against persons with disabilities?

#### **Recommendations**

6. The state to initiate an urgent inquiry into the systematic violations of the rights of persons with disabilities, particularly those with albinism and other disabilities, in Namibia. This inquiry should investigate the gaps in the Witchcraft Suppression Proclamation 27 of 1933 and the National Disability Council Act 26 of 2004, and assess the state's efforts to protect persons with disabilities from ritual practices and cross-border organized crime.
7. Following the inquiry, issue strong recommendations to the Namibian government to address the identified gaps and protect the rights of persons with disabilities. These recommendations should include specific measures to amend existing laws, enhance protection mechanisms, and raise public awareness to prevent ritual-related violence. The Committee should also call for the establishment of a comprehensive legal framework that explicitly protects persons with disabilities from ritual practices and cross-border crimes.

#### **Article 11: Situations of Risk and Humanitarian Emergencies**

The disability community recognizes the different measures the state has taken to put in place interventions to manage and mitigate risk and emergency situations in general. However, there are no specific measures directed to persons with disabilities and their accessibility and inclusion requirements. Persons with disabilities consulted raised concern about not being given priority during times of risk and emergency situations like droughts, floods, and national health emergencies. They further raised concern about the absence of specific measures for the prevention, management, and treatment of COVID-19.

Older persons with disabilities are often forced to relocate, especially during flooding. There is no direct program to support victims with disabilities. Many persons with disabilities suffer from hunger, damage to properties, and there are no recovery programs from the government. Most persons with disabilities depend on their disability grants, and accessing loans is very difficult. We recommend that a stimulus package for recovery be initiated, especially for persons with disabilities who are most disadvantaged.

The National Disaster Risk Management Committee in Namibia, established under the Disaster Risk Management Act 10 of 2012, does not allow persons with disabilities to represent themselves. As a result, many decisions made are not in the best interest of persons with disabilities.

The disability community would like the Committee to inquire from the State Party on the following:

15. When the state will develop specific measures and strategies addressing the needs of persons with disabilities during high risk situations like natural disasters and emergency situations, including national health emergency situations like COVID-19.

16. What specific measures are being taken to ensure the accessibility and inclusion of persons with disabilities in high risk and emergency situations?

### **Article 12 - Equal Recognition before the Law**

The Constitution of Namibia and other subsidiary legislation do not expressly provide for the right to legal capacity by persons with disabilities including those with psycho-social and intellectual disabilities.

The disability community in Namibia would like the Committee to ask the state party:

17. When the government will amend the Constitution of Namibia to include disability as a recognised group experiencing discrimination?
18. When the government will enact legislation to recognise the right to legal capacity for persons with disabilities, especially for those with psychosocial disabilities, intellectual disabilities and women with disabilities?

### **Article 13: Access to Justice**

The disability community realizes that the state party recognizes that access to justice for persons with disabilities is inhibited by many barriers, including failure to provide procedural accommodation such as sign language interpretation, accessible holding cells, and appropriate communication modes for different categories of persons with disabilities. It is recognized that persons with visual impairments are still required to identify perpetrators using "sight-related means" despite being blind. This situation is particularly grave for girls and women with visual impairments who are victims of rape or sexual abuse, as they often cannot identify the perpetrators that way due to their impairment, but could do so based on other elements (e.g. voice, smell, etc.).

Officers working in the justice system have not been trained to handle persons with disabilities who come into contact with the justice system, either as direct or indirect participants, including at investigative stages. We acknowledge the State Party, especially the Namibia Police Force, for training its officials on basic sign language, but this is only done in Windhoek, while most serious incidents occur in rural areas.

Cases involving deaf individuals are prolonged due to a lack of interpretation<sup>4</sup>. In 2024, Windhoek, a schoolgirl was raped, and it took almost three weeks for the rape case to be opened upon the interference of civil society, due to communication barriers. In 2023, a deaf lady was raped in Kamanjab, Kunene region, and police officers refused to open the case because the victim could not identify the suspect, violating her rights.

The disability community would like that the committee inquire on the following:

19. To what extent the government is ensuring that all premises housing the justice institutions and facilities are accessible to persons with disabilities in terms of the built infrastructure, language, and communication modes?  
When the government will commence a permanent and sustainable training programme for officers working in the justice system in order for them to address and

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<sup>4</sup> <https://namiblii.org/akn/na/judgment/nahcmd/2021/317/eng@2021-06-24>

accommodate the needs of persons with disabilities who come into contact with the justice system, including a more “easy to identify” technique to be used by visually impaired victims, especially girls and women?

### **Recommendation**

8. The state must urgently remove barriers to justice for persons with disabilities by providing procedural accommodations like sign language interpretation, accessible holding cells, and appropriate communication modes. Training all justice system officers to handle cases involving persons with disabilities is essential. Special attention should be given to enabling victims with visual impairments to identify perpetrators through non-visual means and ensuring that cases involving deaf individuals are not delayed due to a lack of interpretation services. These measures are crucial to upholding the rights of persons with disabilities and ensuring fair and timely justice.

### **Article 14: Liberty and Security of Person**

### **Article 15: Freedom from Torture or Cruel, Inhuman or Degrading Treatment or Punishment**

### **Article 16: Freedom from Exploitation, Violence and Abuse**

The disability community in Namibia observes that while the government of Namibia took different legislative and administrative measures to ensure protective steps against exploitation, violence and abuse includes persons with disabilities, the disability community is concerned that in Namibia there are no specific interventions that are gender and age appropriate targeted at persons with disabilities who fall victims of exploitation, violence and abuse.

There is little evidence of any measures to educate persons with disabilities in particular persons with intellectual and those with psychosocial disabilities on how to avoid and protect themselves from exploitation, violence and abuse. Furthermore, the disability movement is concerned that mechanisms failed to provide necessary support to persons with disabilities who are victims of exploitation, violence and abuse and their families are not well coordinated and structured and very few persons with disabilities are aware of such structures if they are there.

The raising of GBV cases against persons with disabilities by their care takers, close relatives and families<sup>5</sup>. There is no specific intervention mitigate this. There is no databases collected by security cluster to convenience the state.

### **Recommendation**

9. Create a comprehensive database within the security cluster to track cases of gender-based violence against persons with disabilities. This data will help identify trends, improve intervention strategies, and ensure that the state has accurate

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<sup>5</sup> <https://www.namibian.com.na/gender-based-violenceand-disability-in-namibia/?form=MG0AV3>

information to develop effective policies and measures to protect vulnerable individuals.

10. Establish well-coordinated and structured support mechanisms for persons with disabilities who are victims of exploitation, violence, and abuse, as well as their families. Ensure that these mechanisms are widely publicized and accessible to all persons with disabilities, so they are aware of the available support.

#### Article 17: Protecting the Integrity of the Person

#### Article 18: Freedom of Movement and Nationality

#### **Article 19: Living Independently and Being Included in the Community**

Despite the fact that persons with disabilities are entitled to be prioritised in the government housing scheme, persons with disabilities face systemic challenges to access this facility worsened by their poverty situation and lack of access to information on the same. Although this facility is supplemented by the government's disability grant of \$86.90 per month and increase the special maintenance grant (for children) of \$13.58 to \$ 86.90 the disbursements are still far too inadequate to make any lasting impact on beneficiaries.

There is significant provision of housing to PWD in town through the

The disability community in Namibia would like the UNCRPD Committee to inquire from the state party on the following:

20. How many persons with disabilities have benefitted from the government housing programme? Are these recipients in the mainstream of society or are in a segregated setting?

#### **Article 20: Personal mobility**

Despite the National Policy on Disability of 1997 providing for measures to ensure access to assistive devices to enhance independent living, persons with disabilities especially in rural areas continue lacking assistive devices for prolonged periods. They complain of inefficiencies in the supply and distribution and general lack of devices that are built to their individual needs.

Persons with Disabilities are not moving freely especially in shanty town even though, there are efforts specially from the City of Windhoek to provide lane for wheelchairs. This able people to move to some recreational places, shop and to all areas. Despite these provisions buildings are still not accessible, no ramps, no adequate elevators and all accessible formats.

We recognise the efforts of the government for the laws that allows us to travel locally and internationally even though the aviation policies are not disability friendly especially for the local air transport.<sup>6</sup>

The disability community would like the Committee to inquire from the state on:

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<sup>6</sup> <https://nbcnews.na/node/100196?form=MG0AV3>

21. What measures the government has taken to ensure the general availability of all assistive devices to persons with disabilities, including those in rural areas, at a more affordable cost and within reasonable time?

### **Article 21 - Freedom of Expression and Opinion, and Access to Information**

The government has failed to provide public information in accessible formats such as braille and sign language, excluding persons with disabilities from essential information. Namibian Sign Language is not recognized as a national language, hindering communication in education, health, and employment sectors. This neglect violates the rights of persons with disabilities to access information and participate fully in society. The disability community would like the committee to inquire from the state.

The high cost of sign language interpreters is often used as an excuse for not providing well-trained interpreters, which is an abuse of the rights of deaf individuals. Limited institutionally trained interpreters and the lack of mandatory basic sign language training in tertiary institutions further exacerbate the issue. This neglect by the government fails to ensure equal access to services and information for deaf individuals.

During 2024 elections, political parties, except the ruling party, did not invest in making information accessible to persons with disabilities. National broadcasting stations only provide sign language interpretation during news slots, excluding deaf individuals from important programs on economic affairs, political, and national dialogues. Critical information on Gender-Based Violence, Sexual Reproductive Health, and Civic Education is not translated into accessible formats, violating the rights of persons with disabilities to participate in civic life.

### **Recommendation**

11. The state must officially recognize Namibian Sign Language as a national language to ensure effective communication and inclusion of deaf individuals in all sectors, including education, health, and employment. This recognition will uphold the rights of persons with disabilities to access information and participate fully in society.
12. The state must implement and enforce policies mandating that public information and services be provided in accessible formats, such as braille, sign language, and other appropriate communication modes. This includes ensuring that all political parties and national broadcasting stations provide accessible information during elections, important programs, and during national assembly debates. These measures are essential to guarantee equal access to information and services for persons with disabilities, protecting their rights and promoting their full participation in civic life.

### **Article 22: Respect for privacy**

The disability community appreciates the general protection of the right to privacy for all citizens as provided for by the Constitution of Namibia. The disability movement, however from its consultation process gathered that persons who are deaf still face difficulties in having their privacy protected when it comes to their personal, health and rehabilitation information.



Instances were cited where persons who are deaf had to share their personal HIV/AIDS status and psycho-social counselling (rehabilitation) information with their personal assistants or sign language interpreters who sometimes may not uphold the principle of confidentiality and privacy. This was also shared by persons with visual impairments who complained of having their guides or personal assistants present when seeking health or rehabilitation information. Interestingly, women with disabilities especially, those with visual impairments raised concerns on their privacy to personal sexual reproductive health information because they require other third parties to read or interpret what is written when accessing such information.

The state party should provide clarity to the Committee on:

22. When the state will provide a sustainable training programme on disability inclusion, and sign language for frontline officers in the health sector, including providers of HIV services, sexual reproductive health services and national emergency health services, including situations of rape?
23. What initiatives are being implemented to improve the accessibility of personal, health, and rehabilitation information in formats that do not compromise the privacy of persons with disabilities?
24. How does the government plan to raise awareness and train personal assistants, guides, and interpreters on the importance of confidentiality and privacy for persons with disabilities?

### **Article 23 - Respect for Home and the Family**

During the consultation process, women with disabilities consulted raised concerns that they have been directly or indirectly denied the right to make their own informed choices when it came to their own personal decisions on relationships and marriage. While the Constitution of Namibia, in its Article 14 expressly provides for prohibited grounds of discrimination when it comes to marriage, it does not provide for disability as a prohibited ground for discrimination thus women with disabilities and the disability movement in Namibia feel women with disabilities are not protected by law when it comes to discrimination in relationships and marriage.

Women with disabilities further raised concerns over the negative attitudes of many health workers when accessing sexual reproductive health services like family planning information. They complained that information was not in accessible formats and was generally not available in rural areas.

The State has indicated that they have an obligation to ensure that measures are taken to prevent abuse and violence against them, and it offer adequate counselling and support services are to be provided for those who become victims of violence or abuse. This provision doesn't reflect in our policies particularly for PWDs. There is a high rate of divorce among people with disabilities (PWDs), but no specific counselling services are offered.

The disability community would like the Committee to inquire from the state party on the following:

25. When the Government will amend Article 14 of the Constitution of Namibia to include disability as a prohibited ground for discrimination when it comes to relationships and marriage, especially against women with disabilities?



26. What specific measures are being taken to ensure that the state's obligation to prevent abuse and violence against persons with disabilities is reflected in policies and practices? (including review of old legislation to ensure disability sensitivity and inclusion)
27. How does the government plan to provide adequate counselling and support services for persons with disabilities who become victims of violence or abuse and in the case of Deaf individuals, subsidise the sign language interpreters' fees to guarantee effective communication?

### **Article 24: Education**

Despite the Namibian Constitution guaranteeing the right to education for all, and the Ministry of Education's strategic plan emphasizing inclusive education, significant barriers persist for learners with disabilities. The government has failed to provide adequate resources, such as assistive technology, Braille, and specialized equipment. Inclusive education pilots and the Sector Policy on Inclusive Education have not been effectively implemented, leaving many learners with disabilities without proper support.

Critical issues include the lack of specialized educational resources, inaccessible school infrastructure, and inadequate training for teachers in mainstream schools. Deaf learners face significant challenges due to insufficient sign language interpretation and teaching. Despite the recognition of Braille as an official mode of instruction, and efforts to train sign language interpreters, many schools still lack adequate support for learners with disabilities.

The Ministry of Education, with UNICEF, conducted an assessment in 2018, which found persistent challenges in implementing inclusive education, particularly for children with disabilities. Despite drafting a Basic Education Bill to prohibit discrimination, children with disabilities continue to face discrimination and are often denied enrolment or appropriate learning resources.

Early Childhood Development Centres also lack accessibility and appropriate support for children with disabilities. Higher institutions' inability to train teachers on special programs further exacerbates the issue. This failure to ensure inclusive education violates the rights of children with disabilities, hindering their ability to access quality education and participate fully in society.

The disability community would like the Committee to ask the state party the following:

28. What concrete steps will the government take to ensure that the Sector Policy on Inclusive Education is fully implemented and monitored for effectiveness across all regions?
29. How does the government plan to address the shortage of specialized educational resources, such as assistive technology, Braille materials, and sign language interpreters, in mainstream schools?

30. What measures will be taken to ensure that Early Childhood Development Centres are accessible and equipped to provide appropriate support for children with disabilities from a young age?
31. How will the government ensure that higher institutions have the capacity to effectively train teachers on special education and inclusive teaching methods?

### **Recommendations**

13. The government must urgently implement the Sector Policy on Inclusive Education and establish monitoring mechanisms to ensure its effectiveness. This includes providing adequate resources and support to all schools to accommodate learners with disabilities.
14. Allocate sufficient funding to procure specialized educational resources, including assistive technology, Braille materials, and sign language interpreters. Additionally, mandate comprehensive training for teachers on inclusive education and special programs to ensure they are equipped to support learners with disabilities effectively.
15. The state must develop and enforce policies to ensure that Early Childhood Development Centres (ECD) are fully accessible to children with disabilities. This includes adapting infrastructure, providing appropriate support services, and training educators to work with children with diverse needs. Additionally, the state should support the construction of new ECD centres and upgrade existing ones to meet accessibility standards.

### **Article 25: Health**

The National Health Policy Framework 2010 – 2020 recognizes that the needs of people with disabilities are not sufficiently covered, stating that services for people with disabilities are centralized, inadequate, and there is little systematic involvement of communities in rehabilitation efforts. This is of great concern to the disability community especially that the government has been emphasising CBR within community level. We value the full and effective participation of the community in all CBR programmes and if their participation is not there, CBR remains questionable.

The Government also provides cryotherapy for persons with albinism and sunscreen is listed on the National Essential Medical List for persons with albinism (38,142) (1.3%) and the Government provides sunscreen throughout all state and district hospitals at no cost to the persons with albinism. Persons with albinism in the regions, especially those from rural areas raised concerns on the inconsistent availability of sunscreens to them in the hospitals. Many persons with albinism stated that they have to purchase their own sunscreen from private pharmacies when they can afford, but it is costly and not easy for the majority of them.

The Ministry of Health and Social Services is working on a new Mental Health Bill to replace the outdated 1973 Mental Health Act. Although the bill aims to provide a human rights-based approach to mental health in line with the CRPD, progress has been very slow, despite the government ratifying the CRPD in 2007.

Critics argue that the delays are particularly harmful to persons with disabilities (PWDs), who need timely legislative reforms for better mental health support. The Namibia Law Reform and Development Commission and the Ministry of Health and Social Services have been advancing this bill since at least July 2020, aiming to align it with the 2005 Mental Health Policy focused on community-based services. However, the ongoing delays leave PWDs without the essential mental health services they need, highlighting a significant need for faster action and government accountability.

Inquiries during the consultation process revealed that girls and women with disabilities face a lot of stigma and discrimination from some of the health workers whenever they want to access sexual and reproductive health services, including HIV/AIDS services. MOHSS does not have data on the numbers of girls and women with disabilities accessing their sexual and reproductive health services. This is of concern because statistics provide a basis for the determination of quality health services to different categories of girls and women with disabilities.

We recognise the efforts of the state but there lots challenges such as procurement of wheelchairs, hearing aids, white cane and etc...

The disability community in Namibia would like the Committee to ask the Government the following:

32. When will the national assembly enact the new Mental Health Act to repeal the outdated 1973 Act and reflect the principles of the CRPD?
33. What steps are being taken to increase access to sexual and reproductive health services for girls and women with disabilities, including accessible information and communication modes, especially in rural areas, without stigma and discrimination?
34. How is the Ministry of Health and Social Services (MOHSS) planning to produce disaggregated statistics on the number of girls and women with disabilities accessing sexual and reproductive health services, including HIV/AIDS services, by age and type of disability?
35. What measures are being implemented to decentralize disability services and systematically involve communities in rehabilitation efforts?
36. What initiatives are in place to address the procurement challenges for wheelchairs, hearing aids, white canes and all assistive devices in a timely manner?

### **Recommendations**

16. The state must urgently enact the new Mental Health Act to align with human rights standards. Additionally, disability services should be decentralized to ensure consistent availability of essential resources like sunscreen for persons with albinism, wheelchairs, hearing aids, and white canes. Health workers must receive comprehensive training to eliminate stigma and discrimination against girls and women with disabilities, ensuring equal access to sexual and reproductive health services. The state should also systematically collect and analyze data on health services accessed by persons with disabilities to enhance service delivery and policy implementation. The CRPD Committee should monitor these actions closely to ensure compliance and accountability.

### **Article 26: Habilitation and Rehabilitation**

## **Article 27: Work and employment**

The disability community in Namibia criticizes the Government for its failure to effectively address the employment disparities faced by people with disabilities. Despite developing certain instruments to protect and ensure their right to work and employment, these measures have proven insufficient. The Government's recognition of the challenge does little to alleviate the ongoing struggles of people with disabilities, who continue to face significant barriers to equal employment opportunities. Urgent action and more comprehensive solutions are needed to address these persistent inequalities. With the realisation by Government, we expected and expect more robust steps and practical measures towards increasing the employment opportunities of persons with disabilities in the mainstream competitive and open labour market. Women with disabilities remain with high levels of unemployment<sup>7</sup> in comparison to other women without disabilities thus making them continue to live in abject poverty and vulnerability.

The Labour Act, 2007 (Act No. 11 of 2007) in section 5(1) (e) defines a person with disability as “an individual who suffers from any persistent physical or mental limitation that restricts that individual’s preparation for, entry into or participation or advancement in, employment or an occupation”. This definition is highly discriminatory and systemically causes the exclusion of persons with disabilities from certain forms of employment. This poses great concerns to us.

Despite the above discriminatory definition in law, we are comforted in that section 5(2)(e) of the Labour Act, 2007 prohibits direct or indirect discrimination based on any degree of physical or mental disability in employment. Nevertheless, we have not yet witnessed any punitive action, using the law, taken against any employer who has discriminated against a person on the basis of their physical or mental disabilities in employment.

The Affirmative Action (Employment) Act, 1998 provides that...“in filling vacant positions, the employer shall give preferential treatment to racially disadvantaged persons, women and persons with disabilities who are suitably qualified; Government policy requires all O/M/A’s to include an invitation to persons with disabilities to apply for advertised vacancies in the public service”. This is yet to be witnessed by the persons with disabilities in Namibia.

We commend the state party for radical steps for being inclusive on the temporary census 2023 and during 2024 voters’ registration and election officials. Although the training manuals were not accessible to blind, they were also recruited. We recommend improve in future.

During consultation disability community raise a concern of trending misleading and betraying word “*persons with disabilities are encouraged to apply*” and government is not doing anything about it to hold account the employer advertised the position to ensure that affirmation action exercised, PWDs feels are financially exploited, dignity and rights violated because they are hardly called for interview.

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<sup>7</sup> <https://www.namibian.com.na/economic-inclusion-of-people-with-disabilities-cornerstone-for-economic-growth/?form=MG0AV3>

The disability community would like the Committee to inquire from the Government on the following:

37. When the Government will repeal the Labour Act of 2007 to align its definition of a person with a disability to the terminology provided for in the CRPD and depict a person with a disability in a more dignified manner with respect for human rights
38. What actions are being taken to address the concerns of the disability community regarding the misleading phrase "*persons with disabilities are encouraged to apply*," and to ensure that persons with disabilities are fairly considered for employment opportunities?
39. How has the Government of Namibia worked to increase employment for persons with disabilities, especially women, to address the low 0.4% employment rate reported by the Employment Equity Commission (EEC) for 2017/2018? Additionally, when will the EEC release its 2023/2024 report, and are there any new figures related to this?

### **Article 28: Adequate Standard of Living and Social Protection**

Persons with disabilities have the right to an adequate standard of living, not only for themselves, but for their family. An 'adequate standard of living,' includes food, housing, clothing, needed social services, as well as medical care. It includes the right to security should the person become unemployed, experience an illness, become a widow or widower, or reach an age where support becomes needed. The disability community in Namibia consulted during the consultation process of developing this report, agreed that the standard of living for the majority of persons with disabilities, especially girls and women, is far from being considered adequate.

The living standard of many children with disabilities is far below being adequate when it comes to accessing disability related health services like physiotherapy, nutrition, clean water / sanitation and psycho-social support.

According to government policy, persons with disabilities are entitled to be prioritised in the Government housing scheme. We are concerned that there is little evidence of this priority being provided to persons with disabilities in any government housing scheme. Persons with disabilities consulted expressed no knowledge of any government housing scheme from which they can benefit as persons with disabilities. Persons with disabilities, in particular those in rural areas live in dilapidated huts without any accessible clean water and sanitation source.

The Government is providing a disability grant of \$ 87.28 per month for persons with disabilities above 16 as administered by the Ministry of Gender Equality Poverty Eradication and Social Welfare. It also provides a special maintenance grant of 87.28 for children with disabilities under 16 as administered by the same Ministry as per 2023/2024 budget we commend the state for this.

The disability community in Namibia would like the Committee to inquire from the government on:

40. How many persons with disabilities, with gender and disability disaggregation, have benefited in terms of being housed under the government housing scheme in each year from 2020 to 2024?

41. Steps taken by government to have children with disabilities, especially those in rural areas access adequate health services like physiotherapy, speech therapy, nutrition, clean water and psycho-social services?

### **Article 29: Participation in Political and Public life**

Article 17 of the Namibian Constitution states that all citizens shall have the right to participate in peaceful political activity, intended to influence the composition and policies of the Government. Article 17(1) of the Namibian Constitution states that all citizens shall have the right to form and join political parties and, subject to such qualifications prescribed by law as are necessary in a democratic society, to participate in the conduct of public affairs, whether directly or through freely chosen representatives. This is satisfactory to citizens with disabilities because this right is guaranteed by law whether guaranteed in practice or not. While this is guaranteed for persons with disabilities, *the electoral laws in Namibia still restrict or prohibit persons with psychosocial and with intellectual disabilities from freely exercise their right to vote or voted into public office.*

The right to participate fully in political and public life for persons with disabilities, has been shown from Government's appointment of persons with disabilities in Parliament holding portfolios of ministers and deputy-ministers. The disability community appreciates highly the nomination or appointment of persons with disabilities to Ministerial or Parliamentary office by the President even though appointments are not sustainable. We raise the issue of having a political environment within political parties and outside which will create real space for willing persons with disabilities to join political parties of their choice and be voted into public office. We are concerned that government has not practically done much to create that free and friendly political environment for persons with disabilities to directly engage in partisan politics.

The National Voter Education Policy guides the education of voters by officials appointed as voter educators, the Policy sets out the role of one national a voter educator. The policy regulates and ensures that all electorates understand their roles, their rights and the Namibian political system. The Policy states that information conveyed should be gender and disability sensitive and designed to be relevant to all voters. We appreciate the policy proclamation on voter education. Persons with disabilities, especially those in rural areas raised concerns that the voter education information does not reach them in accessible formats, e.g. Braille for literate persons who are blind. Persons who are deaf also raised concerns that the voter education information is not communicated in sign language on television and voter education meetings. Many persons with disabilities express ignorance on any specific voter education materials targeted to guide or educate them on their voting needs as different persons with disabilities, for instance how to cast a vote secretly or independently or with assistance when you are a person who is blind or illiterate with a disability.

The Electoral Act, 2014 (Act No. 5 of 2014) provides for assistance of persons with disabilities to vote as follows: Section 100 and Section 103 of the Act governs the manner of voting and assistance of voters in elections respectively of this raised a serious on credibility of the voters' vote. Section 103(2) provides that a voter who is incapacitated by blindness or any other physical cause from voting in any prescribed manner, may request the presiding officer to assist the voter in the presence of the person accompanying the voter and to vote

on behalf of the voter in the presence of the person accompanying the voter. Despite these progressive provisions, and as already stated above, persons with disabilities are not provided with this voter education on such provisions before the day of voting. This has caused some persons with disabilities to shun voting because of fear of how they would be assisted.

The disability community is concerned that despite the legal provisions that the voting procedure shall be by a secret ballot, persons who are blind still cannot exercise their right to a secret ballot because the voting process is still using inaccessible ballot materials.

The disability community would like the Committee to ask the following:

42. Measures taken in practice to ensure all voter education information, print or electronic, is in accessible formats and appropriate communication modes for different categories of persons with disabilities including those in rural areas or are illiterate?
43. Measures taken in practice to ensure that persons with disabilities are well educated as voters and how to effectively participate in the voting process as provided by law?
44. Steps taken by the Government to guarantee the right to a secret ballot by persons who are visually impaired and do not wish to use an assistant?
45. How will the government ensure that all political parties invest in making their information accessible to persons with disabilities in future elections?

### **Article 30: Participation in Cultural Life, Recreation, Leisure and Sport**

Sports clubs for persons with disabilities have been established through Paralympics which enables persons with disabilities to be trained in sports and to compete worldwide. We truly commend Government for supporting the Paralympics and encouraging the private sector to participate financially and technically sponsoring sports for persons with disabilities. Persons with disabilities in several regions in the north raised concerns that they were not aware neither included on any sports clubs or Paralympic branches being supported by government.

We realise that the intellectual property or copyright laws in Namibia require that permission should be sought from the publishers or owners of any print materials in case of reproduction or transcription into any format. This affects transcription of any print materials, including recreational or educational materials into Braille or large print. This causes institutions or organisations involved in transcribing such print materials into Braille or large print be deemed practicing illegality or breaking the copyright laws although none have been prosecuted. This requires the government of Namibia to sign and ratify the Marrakesh Treaty which does not require institutions to seek copyright permission when transcribing into Braille or large print for persons who are blind or with visual impairments.

The disability community would like the Committee to ask the following:

46. What measures is the state party putting in place to ensure an increase in funding to Paralympics and to make recreation and cultural amenities in rural areas accessible to persons with disabilities with financial and technical support solicited from the private sector by government?
47. When the Government will sign and ratify the Marrakesh Treaty?



### **Article 31: Statistics and Data collection**

According to the Government, the Namibia Statistics Agency has significantly re-modelled its approach towards mainstreaming disability considerations into its operations following ratification of the CRPD. We are yet to practically witness this measure as the disability community.

Disaggregation of disability-related statistics and data across all Government institutions remains a challenge, including the reliability of such data where it exists.

We recognise the use of the Washington Group of Questions during 2023 census.

The disability community would like the Committee to ask the following:

48. How does the government plan to address the challenges related to the reliability and disaggregation of disability-related data?
49. How does the government intend to use the data collected from the 2023 census to inform policies and programs for persons with disabilities?
50. What specific measures have been taken by the Namibia Statistics Agency to mainstream disability considerations into its operations following the ratification of the CRPD?

### **Article 32: International Cooperation**

#### **Article 33: National implementation and monitoring**

The Government has established the National Disability Council through the Disability Council Act, 2004. The council is currently housed under the Ministry of Gender Equality Poverty Eradication and Social Welfare. The Council's functions are outlined in section 2 of the National Disability Council Act, 2004 as follows:

- Monitor the implementation of the National Policy on Disability in the manner as provided for in this Act;
- Identify provisions in any law, which may hinder the implementation of the National Policy on Disability and make recommendations in that regard;
- Advise any person responsible for the enforcement of existing legislation which provides for equal opportunities for all people in Namibia on the enforcement of that legislation;
- Comment on proposed legislation which may affect persons with disabilities in any manner;
- Consult with persons with disabilities, organisations of persons with disabilities and organisations rendering services to persons with disabilities, and take any other steps in order to obtain necessary information on the implementation of the National Policy on Disability;
- Initiate amendments to the National Policy on Disability in order to ensure that it takes account of changing circumstances; and
- In general, take all necessary steps in order to improve the situation of persons with disabilities in Namibia.



We acknowledge the Government's establishment of an implementation mechanism for disability issues under the National Disability Council of Namibia (NDCN) and the Ministry of Gender Equality, Poverty Eradication and Social Welfare (MGEPESW). However, we are concerned about whether the Government has officially designated the NDCN as the focal point and coordination mechanism for implementing the CRPD.

We are also concerned that the Government has not officially designated the National Human Rights Institution (NHRI) as the independent monitoring mechanism for the implementation of the CRPD. This lack of official designation raises doubts about the effectiveness and independence of the monitoring process, potentially undermining the protection and promotion of the rights of persons with disabilities.

Furthermore, the absence of a clearly defined, independent monitoring body raises questions about accountability and transparency. Without an independent NHRI, the monitoring process may be influenced by political or other non-neutral factors, compromising its integrity. This gap in the implementation mechanism also highlights the government's slow progress in fulfilling its CRPD commitments, which can lead to continued neglect and discrimination against persons with disabilities. It is critical for the government to take immediate action to designate an independent NHRI to ensure that the rights of persons with disabilities are properly protected and promoted.

The disability community would like the Committee to ask the following:

51. When the Government will, through the enactment of comprehensive disability related legislation and policies, domesticate the CRPD and consider designating one or more focal point or coordinating mechanisms for the implementation of the CRPD?
52. Steps taken officially in terms of law to designate the National Human Rights Institution as the independent mechanism for the monitoring of the implementation of the CRPD?
53. Steps taken to practically engage persons with disabilities, through their representative organisations in monitoring the implementation of the CRPD?

### **Recommendations**

17. The government must urgently enact a comprehensive National Disability Law that aligns with the principles of the CRPD. This law should designate clear focal points and coordinating mechanisms for the effective implementation of the CRPD.
18. The state must officially designate the National Human Rights Institution (NHRI) as the independent monitoring mechanism for the CRPD. This will ensure accountability, transparency, and impartial monitoring of the implementation process, free from political or non-neutral influences.
19. The government should establish formal mechanisms to actively engage persons with disabilities and their representative organizations in the monitoring of CRPD implementation. This includes regular consultations, feedback loops, and ensuring their voices are heard in policy-making processes.