



WORLD FEDERATION OF THE DEAF

Legal Seat – Helsinki, Finland

WORLD FEDERATION OF THE DEAF

An International Non-Governmental Organisation in official liaison with ECOSOC, UNESCO, ILO, WHO and the Council of Europe. WFD was established in Rome in 1951.

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Submission on the Draft General Comment No. 7

The World Federation of the Deaf (WFD) welcomes the opportunity to provide comments on the draft general comment on articles 4.3 and 33.3 of the Convention on the Rights of Persons with Disabilities (CRPD) prepared by the Committee on the Rights of Persons with Disabilities (Committee).

WFD's members have been facing barriers in being appropriately consulted by their governments and even by their umbrella organisations of persons with disabilities. Sometimes consultation with a government appointed disability council is considered sufficient in issues affecting lives of deaf people without consulting with our members (national associations of the deaf). There are even cases where umbrella organisations of persons with disabilities have requested our members to send hearing representative instead of deaf representative because of not wanting to pay for sign language interpretation. Despite the obligation set in article 9 of the CRPD it is still rare that national governments would pay sign language interpreter service in all areas of life including consultation and co-operation processes of national associations of the deaf.

Paragraph 15: the WFD would like to note that service providers and organisations for persons with disabilities are sometimes considered equal with organisations of persons with disabilities. For instance, in case where a national association of the deaf is consulted along with five service providers and two organisations for persons with disabilities, it is challenging to ensure that views of deaf people are expressed and taken into account when the majority of people not being deaf people representing deaf community. Therefore the WFD recommends the addition (in bold): “Often, such service providers also take up an advocacy role on behalf **or along with** persons with disabilities.” to further emphasise that the advocacy work should be left in the hands of organisations of persons with disabilities without being influenced by service providers. This is in line with the last sentence of paragraph 16 of the draft general comment. However, it is important to remind national governments that it is their responsibility to empower organisations of persons with disabilities become active participants because currently service providers and other stakeholders often have more information and advocacy skills than persons with disabilities. For this reason the WFD would like to suggest the Committee to consider adding a paragraph on clarifying this responsibility.

Concerning paragraph 22 of the draft general comment the WFD agrees that parents have important role in issues concerning their children with disabilities. However, there may be situations where parents' organisations' views are contradictory with those of organisations of persons with disabilities. For example, it is possible that an organisation of parents of deaf children is against teaching sign language to deaf children while national association of the deaf advocates towards the right for deaf children to acquire sign language as early as possible. Thus the Committee might want to encourage consultation with both parties concerning children with disabilities – organisation of families of children with disabilities and organisation of persons with disabilities.

Paragraph 32 lists examples of reasonable accommodation measures. The WFD would like to recommend to make this list more flexible by the following change in bold: “Particularly organisations of persons with sensory and intellectual impairments should be provided with **the following reasonable accommodation but not limited to** meeting assistants....”

For paragraph 63 the WFD would like to ask the Committee to clarify that professional sign language interpretation should be provided as guided by article 9 of the CRPD with the following change in bold: “This also includes the use of **professional sign language interpretation**, Easy Read...” This is very important because the WFD has been informed by several members that their organisations have been expected to bear the costs of sign language interpretation at meetings where organisations of persons are consulted. Sometimes professional sign language interpreters are even expected to volunteer their service, which is not acceptable practise.

If you have any question, please do not hesitate to contact WFD Interim Team Leader Ms Eeva Tupi at eeva.tupi@wfd.fi

About the World Federation of the Deaf

The World Federation of the Deaf (WFD) is an international non-governmental organisation representing and promoting approximately 70 million deaf people's human rights worldwide. The WFD is a federation of deaf organisations from 135 nations; its mission is to promote the human rights of deaf people and full, quality and equal access to all spheres of life, including self-determination, sign language, education, employment and community life. WFD has a consultative status in the United Nations and is a founding member of International Disability Alliance (IDA). (www.wfdeaf.org) Email: info@wfd.fi