



*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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*President*  
**COLIN ALLEN**

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### **Submission to the Committee on Economic, Social and Cultural Rights for consideration in General discussion on just and favourable conditions of work**

The World Federation of the Deaf (WFD) is pleased to have the opportunity to contribute in developing the draft general comment on the right to just and favourable conditions of work. WFD commends taking persons with disabilities into account in several parts of the draft but would like to clarify some issues that concern deaf people.

[Deaf People and Human Rights Report](#) published by the WFD in 2009 reflects the situation where deaf people encounter various difficulties in employment. It is important to note that deaf people face communicational barriers in all aspects of life due to ignorance of the society on sign language. Deaf people also experience prejudice and unemployment rate among this population is high in several countries.

WFD was established in Rome, Italy in 1951, and is an international non-governmental organisation with membership comprising of 134 Ordinary Members, Individual Members, Associate Members and International Members. The WFD also has eight (8) Regional Secretariats. WFD's office is located in Helsinki, Finland. The WFD has consultative status within the United Nations (UN) system. In this role, the WFD works closely with the UN and its various agencies in promoting the human rights of deaf people in accordance with the principles and objectives of the UN Charter, the Universal Declaration of Human Rights, the Convention on the Rights of Persons with Disabilities and other general acts and recommendations of the UN and its specialised agencies, e.g., the UN Economic and Social Council (ECOSOC), the UN Educational, Scientific and Cultural Organization (UNESCO), the International Labour Organization (ILO) and the World Health Organization (WHO). WFD also has participatory status within the Council of Europe (COE) and is a member of International Disability Alliance (IDA). The WFD works towards the global achievement of human rights for all deaf people and develops its activities towards the goal of equalisation of opportunities and full participation in society by deaf individuals in every country.

In the draft general comment, the WFD hopes to see more mentions on workers using different languages, including sign language, for instance in paragraphs 6, 33 and 49. The WFD is concerned about the definition of relevancy in paragraph 27 of the draft. Who would decide which language is relevant? If a national sign language has official status in a country, this should be noted. In the absence of such recognition there is risk of excluding sign language. Therefore the WFD would like to request rephrasing of this part allowing an employee to have access to her or his own language that also includes sign language.

Regarding paragraph 48(iii) of the draft the WFD would like to clarify that reasonable accommodation also covers measures that cost. For instance, the provision of professional sign language interpretation for meetings, trainings and under any other circumstance to enhance the possibility of a deaf employee to fulfil her or his tasks at workplace should be covered by an employer or ultimately by a national government. The WFD is aware of cases where deaf people have not been recruited based on the cost of sign language interpreter and where sign language interpretation was not provided. Besides the cost issue, reasons for the lack of provision include negative attitude and ignorance towards deaf people that prevail in the society. Another issue in this paragraph that concerns the WFD is the safety and health of an employee. Some deaf people have not been employed due to employers claiming that they are a safety risk. However, employers should instead seek a solution to employ them and provide reasonable accommodation. National governments might interpret paragraph 48(iii) of the draft as need to protect persons with disabilities that might take excessive effect leading

to unemployment of e.g. deaf people, which would be undesirable result marginalising this population from employment.

The WFD hopes that this submission is useful in the development of the general comment on the right to just and favourable conditions of work

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