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Department:
Communications
REPUBLIC OF SOUTH AFRICA

Disability & ICT Strategy



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Foreword by the Minister

Information and communication technologies (ICTs) have changed the way things are done and continue to influence all aspects of human life, be it in the business, social or entertainment world. It has revolutionized life and created opportunities for growth and development. Equally, this revolution has also brought with it challenges and obstacles for some sectors of our communities. The World Summit on Information Society Declaration of Principles (2003), provided a number of policy guidelines and commitments by Governments on building an inclusive information society upon which States around the world should pursue their strategies. State parties further reaffirmed the need to build a people-centred information society that takes into account the needs of all, including people with disabilities during the second Information Society Summit in Tunis, November 2005.

The Department of Communications as the leading ICT policy development arm of the South African Government has been active in the debates leading to the finalisation of the Convention. In line with the White Paper on an Integrated National Disability Strategy (INDS) as amended, the Department developed the Disability & ICT Strategy informed by this policy and relevant ICT Legislation. This follows the completion of a situational analysis on progress made in the integration of the disability perspective within Department and its State Owned Enterprises (SOEs) since the coming into effect of the White paper. The findings of the study provided a baseline data on the challenges and barriers experienced by people with disabilities in accessing and using technologies and services.

The study further elaborated on possible intervention strategies to close identified gaps to ensure persons with disabilities enjoy the benefits of using ICTs. Against this background, the Department of Communications took the decision to initiate a systematic approach to facilitate the mainstreaming of disability in its work, SOEs and the broader ICT sector. The objective is to improve access to services and opportunities through facilitating the evolving concepts of universal design, universal access and ICT for all to ensure persons with disabilities benefit from new and existing services, products and technologies.

The ratification of the Convention on the Rights of Persons with Disabilities by the South African Government in October 2007 gave further impetus to the development of the Strategy. The Convention is a Global Treaty committing Governments around the world to implement measures to improve access to services and opportunities for the estimated 650 million Persons with Disabilities worldwide.

Although the treaty is implemented in its entirety by entities, it contains two specific articles that speak directly to the work of the Department and the ICT sector in general:



Ms Dina Pule
Minister

- **Article 9: Accessibility, which include access to information and communication technology.**
- **Article 21: Freedom of Expression and opinion and access to information**

For the first time, there is certainty in the definition of critical concepts as outlined in the Convention and more especially the definition of universal design and universal access as it applies to the ICT sector. It is in this context that we felt the ICT sector including manufacturing companies, standards generating bodies, policy makers and regulators should take these developments as an opportunity rather than view them as a cost.



The Disability & ICT Strategy development followed a series of consultations with stakeholders to ensure their views and interests are considered. Disability is one of the priority areas and elements of the Strategy of the Department of Communications. The development and implementation of the Disability & ICT Strategy will accordingly assist the Department in its efforts to mainstreaming disability at all levels. It will also enable the integration of disability in structures including international forums and platforms such as the International Telecommunications Union (ITU). As a further demonstration of its commitment, in October 2008, the Department hosted the World Telecommunications Standardization in South Africa (WTSa 08).

Accessibility issues for persons with disabilities featured prominently on the discussions which led to the adoption of a special Resolution on ICT Accessibility for Persons with Disabilities, enabling the ITU to further move forward with mainstreaming the disability dimension in its work and structures. With the finalization of the digital migration process, whose switch on coincided with the WTSa 08, on 1st November 2008, it is our hope that the ICT needs of persons with disabilities will be better catered for. These historic developments signal the country's readiness to tackle the question of social exclusion through systematically putting the needs and interests of people with disabilities and other vulnerable groups at the centre of policy development. This we hope would herald and set the pace for service delivery and speed up equalization of opportunities for these groups. It should also be mentioned that the implementation of the Strategy is a multi-stakeholder responsibility, requiring cooperation, collaboration and partnerships between different stakeholders.

In this regard, the Department would readily work with all other stakeholders in the implementation of the of the Strategy to achieve the goal of an inclusive, people-centred information society as articulated in the Information Society Declaration principles adopted in Tunisia November 2005 for the benefit of the five million or so South Africans with disabilities. I take this opportunity to thank all stakeholders, disabled peoples organizations (DPOs), State Owned Enterprises, Government Departments and the Ministry for Women, Children and Persons with Disabilities for taking their time to participate and contribute during consultative workshops that led to the finalisation of the Strategy. The Department values these contributions. The next step is to support the implementation, monitoring and evaluation of the Strategy.

The Strategy covered a period of five (5) years and is a Departmental intervention approach on disability to ensure there is a measured way on our interventions. It contains information on the background and presents a clear picture as informed by the findings of the study on situational analysis. The final part is the implementation framework which would be reviewed annually for the period covered by the Strategy. All Branches and stakeholders are encouraged to support the implementation.



MS DINA PULE, MP
MINISTER OF COMMUNICATIONS



DEFINITIONS

- **Mainstreaming**

“Mainstreaming is the process of assessing the implications for designated groups such as People with Disabilities, of any planned action, including legislation, policies and programmes, in all areas and at all levels. It is a Strategy for making the concerns and experiences of People with Disabilities an integral dimension of the design, implementation, monitoring and evaluation of policies and programmes in every facet of an organisation or institution including its political, administrative, economic, social and service delivery aspects so that designated groups benefit equally and inequality is not perpetuated. The ultimate goal is to achieve equality.” (ECOSOCC, 1997)

- **Disability**

People with Disabilities include those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation on an equal basis with others in society. UN Convention 2006

LIST ABBREVIATIONS

1. DoC: Department of Communications
2. DPOs: Disabled Peoples’ Organisations
3. DPSA: Disabled People of South Africa
4. GDYC: Gender, Disability, Youth and Children
5. ICTs: Information and Communication Technologies
6. INDS: Integrated National Disability Strategy
7. OSDP: Office on the Status of Disabled Persons
8. PwDs: People with Disabilities
9. SABC: South African Broadcasting Corporation
10. SOEs: State-owned Enterprises
11. UN: United Nations
12. WSIS: World Summit on Information Society
13. UNCPRD: United Nations Convention on the Rights of Persons with Disabilities



Department of Communications

Vision

South Africa as a global leader in the development and use of Information Communication Technologies for Socio-economic Development.

Mission of the DoC

Building a better life for all through an enabling and sustainable world class information and communication technologies environment.

Corporate Value System of the DoC

- Transparency
- Respect
- Accountability
- Fairness
- Integrity
- Excellence
- Innovation

The Legislative Framework of the DoC

The Legislative Framework of the Department is contained mainly in the following:

- Broadcasting Act (Act 4 of 1999)
- Electronic Communications and Transactions Act (Act 25 of 2002)
- Former States Broadcasting Reorganisation Act (Act 91 of 1996)
- Electronic Communications Act (Act 36 of 2006)
- Independent Communications Authority Act of South Africa (Act 13 of 2000)
- Sentech Act (Act 63 of 1996)
- Telecommunications Act (Act 103 of 1996)
- Postal Services Act (Act 124 of 1998)

In executing its role the Department is also guided, among others by:

- The Constitution of the Republic of South Africa, 1996 (Act 108 of 1996)
- Public Service Act, 1994 (Act 103 of 1994) as amended
- Public Finance Management Act, 1999 (Act 1 of 1999) as amended



1. INTRODUCTION

The Department of Communications undertook a benchmarking study conducted in 2001 that was conducted by ForgeAhead Consultancy. It involved conducting an international benchmarking exercise, which included site visits to learn best practices from other countries such as Australia and the United States of America. The recommendations made in the report included the creation of an institutional mechanism to facilitate disability mainstreaming both in the work of the Department and the ICT sector. The following are some of the results emanating from the recommendations of the report:

- creating a dedicated Disability Directorate;
- developing an overarching departmental policy on disability;
- establishing a disability structure within the regulator to facilitate the implementation and monitoring of service providers' compliance with prescribed disability licenses, regulations and policies;
- formulating a DoC medium-term Strategy and subsequent strategic plans;
- hosting, the Disability Pamoja in 2005; (The Women's Mutingati and the NEPAD Youth ICT workshops were in response to the WSIS Tunis 2005 Programme of Action. The outcomes informed South Africa's response to the Tunis recommendations)
- sanctioning a budgetary allocation for disability within the Department's overall budget since 2000;
- implementing a digital migration Strategy that reflects access to broadcasting for people with disabilities;
- setting up the ICT Charter - Balanced Scorecard – sets specific targets for companies controlled and owned by people with disabilities;
- reviewing the Community Radio Stations Strategy to include disability; and
- in 2006, focusing on improving capacity through mainstreaming disability in the work of the Department by elevating the Special Programmes Unit to a Chief Directorate responsible for gender, disability, youth and children, and placing it under the Director-General's office to ensure better co-ordination and reporting

As informed by the outcomes of the benchmarking study and the medium-term strategies for 2004-2006 and 2007-2010, the Department initiated a process that would provide a framework for integrating disability mainstreaming within the Information Communication Technology (ICT) environment within the country, regionally and internationally. In the 2004-2005 financial year the first phase of the process included the Department's establishment of a Disability Desk under the Special Programmes Unit, which was later in the 2006-2007 financial year elevated to a Disability Mainstreaming Directorate under the newly established Gender Disability, Youth and Children (GDYC) Chief Directorate that replaced the Special Programs Unit. The GDYC Chief Directorate's mandate included mainstreaming disability within the Department and also within its state-owned enterprises (SOEs).

The development of a Strategy on disability mainstreaming to address the gaps in the accessing and utilizing of ICTs by persons with disabilities was identified as a priority. The Strategy development process begun with the Department, through the GDYC Chief Directorate,



commissioning a study on a situational analysis of disability mainstreaming and integration within the Department and its state-owned enterprises, and the subsequent submission of a report.

The Department of Communications, recognising the need for and importance of consultation for the successful implementation of its programmes, began to develop a Disability & ICT Strategy by organising a first and second consultative workshop with key stakeholders and state-owned enterprises, including organisations for people with disabilities, and government structures and departments. A number of recommendations emanating from the situational analysis report and these consultative workshops have formed the basis for the development of the Disability Mainstreaming and Information Communication Technology Strategy.

2. RATIONALE FOR THE DEVELOPMENT OF THE DISABILITY & ICT STRATEGY

The Department has long been involved and vocal on disability and services to persons with disabilities responded through intervention programmes and also began the process of budgeting for disability specific actions as far back as 2000. Given the centrality of ICTs in development, it became apparent that a more coherent and well co-ordinated way is required to ensure sustainable integration of disability within the Information and Communication Technology environment. ICT is therefore central to the country's strategies for achieving social upliftment and improving the quality of life of all people, including those who have disabilities and address the digital divide.

To ensure universal access to basic services and opportunities, Government encourages the uptake and improved utilisation of ICTs, so that all South Africans are given an equal opportunity to enter and participate in the mainstream economy. The basis of a knowledge economy is education and training. We therefore require a strong platform for infrastructure development, a human capital resources policy and programmes so that we transform not only our society, but also most fundamentally, transform government service delivery. One of the core objectives of development should be technological advancement that benefits all - including those who are disabled and therefore marginalised.

A situational analysis of disability mainstreaming was commissioned as the phase in the Strategy development process to gain first hand numbers, also referred to as baseline data upon which the Department could build its work. It is this information that helped build a formidable position on the need for the Strategy and included gaps and intervention models to close these. The Strategy thus is an intervention by the department to close those gaps and bring all interventions in line with relevant Legislation on a sector wide approach as opposed to silo (unit) approach mainstreaming. Therefore the Strategy will serve as a bases for the ICT sector in support of the Department's continuing efforts, in terms of its mandate, to improve the lives of all South Africans by facilitating and promoting ICTs.

The Strategy development process is guided by the following principles:

- Universal Access and Universal Design - also referred to as the inclusive design of ICT services and facilities
- Accessibility
- Equal participation
- Self-representation



3. LEGISLATION AND POLICY FRAMEWORK INFORMING THE DISABILITY & ICT STRATEGY

3.1 International Context

The United Nations declared 1981 to be the International Year of Disabled Persons and called upon member states to initiate measures for preventing the marginalisation of persons with disabilities, rehabilitating such persons and for creating equal opportunities for them. The year set the tone for more comprehensive programmes, which contributed significantly to the lives of persons with disabilities. Prominent among these are: the World Programme of Action Concerning Disabled Persons, the UN Decade of Disabled Persons (1983-1993), and the Standard Rules on the Equalisation of Opportunities for Persons with Disabilities - the latter being adopted by the General Assembly in 1993 at the end of the Decade of Disabled Persons.

The second phase of the World Summit on the Information Society, WSIS, held in Tunis on 16-18 November 2005, raised awareness concerning ICT and disability. The Summit reaffirmed the commitment to provide equitable access to information and knowledge for all, with the target completion date for building ICT capacity for all and confidence in the use of ICTs set for 2015. It also emphasised the use of ICTs through the improvement and delivery of relevant education and training programmes/systems, including lifelong and distance learning. The Summit also noted that special attention would be paid to formulating universal design concepts and utilising assistive technologies that promote access to all persons, including persons with disabilities.

The Summit emphasised the equal participation of all in the Information Society, and that such participation should also be guaranteed to people with disabilities. The summit's recommendations highlighted the fact that disability awareness must be included in all ICT design stages, as well as during its implementation, monitoring and evaluation. The aforementioned programmes culminated in the adoption of similar initiatives by member countries to further advance the rights of the disabled globally.

In Africa, specifically, we have seen regional governments adopting programmes such as the African Decade of Disabled Persons in Addis Ababa, Ethiopia (1999-2009). Throughout these initiatives the disability sector played an important role in enabling governments to draw lessons and experiences from them. The work resulted in the development and adoption of the United Nations Convention on the Rights of Persons with Disabilities (UNCRD) (2007). It is the first international treaty and instrument on disability and was indeed a resounding success for people with disabilities.

It is against this background that the Department has embarked on a process of achieving an inclusive information and communication society. The United Nations Convention on the Rights of Persons with Disabilities has furthermore given Government the responsibility of ensuring that the rights of people with disabilities are recognised and respected everywhere. Articles 9 and 21 of the Convention outline the need for a more accessible ICT environment that caters for the needs of people with disabilities by employing methods and formats accessible to them.

The Tunisian resolutions on an inclusive information society have situated the needs of people with disabilities at the centre of development by highlighting the importance of



universality when designing and building ICT infrastructures and facilities. Universal access and universal design within the ICT environment are two fundamental requirements for a just and fair approach to alleviating the problems of exclusion i.r.o. people with disabilities.

3.2 National Context

When the South African Government adopted the White Paper on an Integrated National Disability Strategy (INDS) in November 1997, it ushered in a new era for people with disabilities. The INDS sets out to define a policy framework for the South African Government, civil society groups and the private sector to initiate policies and programmes aimed at integrating the disability factor during the planning stages of all programmes, policies and projects.

The policy furthermore sets out the institutional strategies for improving the coordination and implementation of the Disability Policy.

With its vision: "Society for All" (**INDS, 1997:18**), the policy framework locates disability within the social model that views disability as a social construct, i.e. as a developmental and human rights issue. This model is a welcome departure from the medical disability model, which views disability as a health and a welfare issue. The social model thus "implies a paradigm shift in how we construct disability". Thus it is:

- the stairs leading into a building that disable the wheelchair user, rather than the wheelchair;
- defects in the design of everyday equipment that causes difficulties, not the abilities of the people using it;
- society's lack of skills in using and accepting alternative communication methods that excludes people with communication disabilities; and
- the inability of ordinary schools to deal with diversity in the classroom, which forces children with disabilities into special schools.

In short, the policy emphasizes society's shortcomings in respect of disability and not the abilities and capabilities of people with disabilities themselves, (**INDS, 1997:11**).

3.2.1 The National Disability Policy Framework

Recently the Office on the Status of Disabled Persons at the Presidency concluded a consultative process on reviewing the INDS. The review is in accordance with a 2005 Cabinet resolution, following recent developments in respect of disability. The policy framework is still in draft form and awaits finalisation. It seeks to mainstream the disability perspective into all sectors of society to ensure access and accessibility to opportunities and government services for people with disabilities.

Like the INDS, the policy considers key aspects of the Convention on the Rights of Persons with Disabilities: aspects that will assist the Government to mainstream disability into the broader legislation of various sectors to ensure that persons with disabilities will be able to enjoy all fundamental human rights. Notable legislation and documents prohibiting discrimination on the basis of disability includes the -



- Constitution, 1996 (specifically Chapter 2: Bill of Rights),
- Promotion of Equality and Prevention of Unfair Discrimination Act, 2000,
- Employment Equity Act, 1997,
- Public Service Act, 1994,
- Code of Good Practice on Key Aspects of Disability,
- Technical Assistance Guidelines on the Employment of People with Disabilities.

4. THE STATUS ON DISABILITY MAINSTREAMING IN DOC AND ITS STATE OWNED ENTERPRISES

The Department initiated a series of processes as early as 2000 through integrating disability on broadcasting on community radio programming, through the procurement system and active participation on issues and structures on disability. A benchmarking study on disability was also conducted in 2001 which produced a report with recommendations on increase mainstreaming of disability in the work of the department and informed the restructuring at the Department during the 2004-2005 financial year. This resulted in the creation of a Disability Desk under the Special Programmes Unit, which was later (2006-2007) elevated to a Directorate under the reviewed Gender, Disability, Youth and Children (GDYC) Chief Directorate. The GDYC mandate included spearheading the mainstreaming of disability within the Department and also within its state-owned enterprises (SOEs).

The development of a Strategy on disability was identified as a priority. This began with the Department, through the GDYC Chief Directorate, commissioning a study on a situational analysis of disability mainstreaming and integration within the Department and its state-owned enterprises, and the subsequent submission of a report. The Situational Analysis Report revealed a number of issues which, by and large, militated against or “did not reflect the attainment of disability objectives and outputs.” The report provided a number of recommendations that would have the impact of “mainstreaming and integrating a disability perspective across all planning, coordination and collaboration among the various stakeholders and DoC Business Units.

The Department of Communications, recognising the need for and importance of consultation for the successful implementation of its programmes, began to develop a Disability & ICT Strategy by organising a first and second consultative workshop with key stakeholders and state-owned enterprises, including organisations for people with disabilities, and government structures and departments. A number of recommendations emanating from these consultative workshops have formed the basis for the development of this Strategy.

4.1 Situational Analysis Report

During the 2006-2007 financial year the Department commissioned a situational analysis of disability mainstreaming and integration within the Department and its SOEs. The purpose of the situational analysis was to gather basic data on the progress of disability integration, as well as to identify shortcomings in policies, programmes and projects developed and implemented since the adoption of the White Paper on an Integrated National Disability Strategy (INDS) in November 1997.

The analysis was conducted by the consortium, Samaita Maita Development Services (SMDS). This consortium is owned and managed by People with Disabilities in partnership with Disabled People South Africa (DPSA) and was appointed to undertake the analysis



and to submit a report with findings and recommendations. The analysis represents the first phase in the process of developing a Disability & ICT Strategy for the Department, as noted in the Department's Medium-Term Strategy (2006-2009).

The Situational Analysis Report revealed a number of issues which, by and large, militated against or "did not reflect the attainment of disability objectives and outputs." The report provided a number of recommendations that would have the impact of "mainstreaming and integrating a disability perspective across all planning, coordination and collaboration among the various stakeholders and DoC Business Units.

Among other things, the analysis revealed the following:

- a. Although disability objectives and outputs have been articulated in some of the DoC's strategic plans over the past few years, a twin-track approach had not been utilised, and very limited objectives and outputs had been set. Related DoC annual reports do not reflect the attainment of the set disability objectives and outputs.
- b. The inclusion of disability in the DoC's strategic plans can be traced back to the 1999-2004 Medium-Term Expenditure Framework, when disability was integrated into the programme on community radio stations. *Ad hoc* activities were implemented, and good results had been achieved upon the implementation of these activities. For instance, the criteria for awarding tenders on disability and other disability-integrated projects reflect innovation and creativity. However, no evidence of the implementation of this policy was obtained from reports and documentation supplied by the Department for review by the service provider, and these tender guidelines had not been mainstreamed in DoC's procurement policies.
- c. The DoC currently employs 341 employees, only six of which have disabilities.
- d. No proactive and effective activities to mainstream disability were detected in the management of the SOEs - hence the lack of meaningful policy/strategic development across the board.
- e. Provisions in the Acts that seek to address issues of disability in areas, such as broadcasting, the postal services and telecommunications (as described above) do exist. However, these provisions are not specific concerning what needs to be provided to address the needs of disabled people. This shortcoming leaves a vacuum for the Regulator in terms of enforcement and for the SOEs and relevant ICT service providers to be obliged to comply fully with the provisions of the Acts. For example, a clear programme and/or checklist is required that will guide SoEs and other ICT service providers to develop and implement assistive devices and technologies to accommodate the needs of disabled people.
- f. Pieces of legislation that govern the work of the Department of Communications, its SOEs and the ICT sector contain sections that refer to the inclusion of people with disabilities. However, these sections are limited in scope and are not supported by regulations that provide mechanisms for implementation and enforcement;
- g. Although the SOEs that participated in the analysis seem to have embraced disability mainstreaming, much still needs to be done besides simply employing persons with disabilities: Disability must ultimately form part of their core business;



- h. Without a coherent Strategy and policy on disability and a commitment to allocating appropriate financial resources in each financial year, implementation remained sporadic, uncoordinated and lacking in monitoring and evaluation systems;
- i. The Department of Communications made an effort to implement the INDS. This implementation effort resulted in a number of achievements that include integrating disability within the sectors for community radio stations and defining an approach to procurement;
- j. The report further states that, despite such achievements, reports submitted to the Office on the Status of Disabled Persons (OSDP) during the period under review highlighted that key areas still needed to be addressed if the implementation process were to be effective. Such areas include the need for: a disability mainstreaming policy and Strategy, legislative amendments, dedicated personnel, education, raising awareness, access to information and others.
- k. Disability is mainstreamed in a number of sections in the ICT Charter, including those sections dealing with bonus points, which are aimed at providing incentives to enterprises to amplify the effect of their transformation programmes. On paper the ICT Charter reflects well-mainstreamed key disability priorities. However, to date no data or evidence on the implementation of these priorities could be obtained. No enforcement and monitoring mechanisms exist with which to track disability mainstreaming;
- l. It is clear from the evidence contained in reports and other reviewed documents that people with disabilities have not benefited substantially from the pieces of legislation and policies in the communications sector. The exceptions are the progress made by the DoC, TelkomSA with regard to employment equity, and the SABC with regard to programming. In the case of the DoC, a 1,7% attainment with regard to employment was achieved. However, we noted perceptions that the 2% target was viewed as a ceiling instead of as a minimum requirement. Furthermore, disabled persons are presently not receiving services and products related to the core business of each entity.

4.2 Situational Analysis Report Recommendations

The situational analysis report provided the following recommendations in order of priority:

- Developing an overarching mainstreaming Strategy for the DoC, SOEs and the ICT sector;
- Policy development and the amendment of existing policies within the ICT sector to incorporate disability mainstreaming;
- Implementing key aspects of legislation that benefit persons with disabilities, such as the Employment Equity Act and the Preferential Procurement Act;
- Designing and developing disability standards and guidelines on access standards for people with disabilities within the ICT sector, guided by the universal design principles;
- Implementing the Tunis Declaration on Disability;
- Budgeting for the communication and implementation of developed strategies within set time frames. (This Strategy will include, among others, developing a communication Strategy to increase disability awareness, policies, standards, guidelines, strategies and action plans in accessible formats.);



- Building capacity at soes to implement disability mainstreaming;
- Establishing disability focal points at each SOE, with a clearly defined role and mandate for each;
- Involving members of senior management, since their role is essential for the successful implementation of disability mainstreaming and since they are the key decision makers within institutions;
- Requiring all entities to allocate amounts in their budgets for disability mainstreaming interventions and projects;
- Coordinating training for focal points; and
- Conducting regular review exercises to monitor and evaluate implementation progress and the utilisation of budgets by employing developed action plans on disability mainstreaming. Such plans should clearly specify time frames to ensure effective progress monitoring and effective impact evaluation.

The DoC recognises the importance of mainstreaming and integrating disability perspectives into all planning, coordination and collaboration among the various stakeholders (DoC line functions, portfolio organisations and service providers, including organisations involved in the ICT and disability sector).

5. DISABILITY MAINSTREAMING AND ICT STRATEGY PRIORITY AREAS

Following a lengthy consultative process with disability sector representatives and the ICT sector, the accessibility of stakeholders has been identified as a priority in terms of the fundamental rights and freedoms to be afforded persons with disabilities. Accordingly, the Department has adopted a mainstreaming approach to dealing with disability to ensure a longer term solution to the problem of exclusion and discrimination. This will be achieved by building inclusive an accessible ICT services and facilities. The Department furthermore acknowledges that the implementation of the Strategy overlaps with the activities of other stakeholders, rendering it a multi-stakeholder responsibility that requires the proper coordination of activities.

Although mainstreaming is a critical component of the Strategy, the Department also acknowledges that other key interventions may be considered on a point-by-point basis, and be implemented to address identified problems. Such interventions will support longer term initiatives. Mainstreaming strategies identified include the following:

5.1 Improving Access to Information And Communication Technologies for Persons With Disabilities

The Department has completed the process of developing the Broadcasting Digital Migration(BDM) Strategy. One critical aspect of the Strategy is to influence the implementation of the BDM Strategy to ensure improved access to information for persons with disabilities. The latter will be achieved through recommendations and proposals on minimum standards of access for different types of disabilities. Access to information has become a priority issue for persons with disabilities. Efforts will be made to encourage role players in the industry to address these factors, specifically in the following areas:

- o Broadcasting services in line with the Digital Migration Strategy
- o Telecommunications equipment and services



- o Website design
- o New and existing products and services

5.2 Awareness Raising and Sensitization

Although the Department has successfully implemented a series of annual awareness and sensitization programmes, a need for sustained ICT and disability awareness and sensitization programmes still exists. The Department plans to mainstream disability in other awareness activities, including during the commemoration of international events, such as World Information Day, Women's Day, International Day of Persons with Disabilities and other important activities, to ensure the message cuts across all sectors and stakeholders. The Department's focus on awareness will be twofold: **Internally**, by targeting staff at various levels and **externally**, by targeting communities, including disabled people's organisations (DPOs), civil society, government departments and the ICT sector in general.

Heightened awareness and sensitization among the Department's management, staff and the general public by:

- conducting quarterly and annual sector-specific awareness campaigns and sensitization programmes aimed at internal staff members and those at the SOEs;
- encouraging and engaging the ICT sector to develop its own awareness campaigns and sensitization programmes, products and services that benefit persons with disabilities;
- establishing directory of services and projects for persons with disabilities and their organisations developed in collaboration with SOEs; and
- Commemorating International Day of Persons with Disabilities annually.

5.3 Mainstreaming Disability in Policy Formulation, Implementation, Monitoring and Evaluation

As a leading department in the development of ICT policy in the country, the department has produced some innovative policies that incorporate disability as a single, key priority. However, most of these policies do not indicate how disability issues will be addressed. Those policies that do, address disability, do so only in their objectives, while failing to mention any implementation strategies. With the coming into force of the Convention on the Rights of Persons with Disabilities on May 2008, there is a need to review ICT policies and to align them with the Convention's requirements, specifically concerning accessibility and universal design. As the implementing arm of the government, the Department of Communications is expected to report on the progress of implementing the Convention in its sphere of work in two years' time.

Accordingly, the Strategy will facilitate a process for reviewing policies and aligning them with the Convention's requirements, including the new definitions and language appropriate to the disability sector.

5.4 Skills Development

One of the critical areas addressed in the Department's medium-term Strategy which is also a Government priority, is skills development. Currently the Department is implementing



a number of skills programmes by way of several intervention strategies, including, among others, the following:

- International Computer Driver's License through 18 country-wide further education and training colleges
- e-Skills Institute
- Annual internship programme
- Short courses
- Bursaries (including reasonable accommodations)
- National Youth Service Programme coordinated in collaboration with the Presidency.

According to the Department of Labour, the target for disability skills development is four per cent of persons with disabilities. However, by arrangement the Department aims at a 10 per cent (10%) attendance of these programmes by persons who have disabilities. The Strategy will engage all the relevant stakeholders to ensure that disability targets within these programmes are achieved and monitored to ensure that at least 10% of persons with disabilities will benefit from the programmes and that their needs will be accommodated. Learners with disabilities will also be assisted through exit strategies upon completing their study programmes.

5.5 Employment and Human Resources

Although the Department has made progress with regard to the increased employment of persons with disabilities, it still fell short of the target of two per cent set by the Department of Labour. The Situational Analysis Report also alludes to the failure to achieve these targets. However, compared with other departments, the Department fared better concerning the employment of persons with disabilities. The Department ranks among the national departments that employ persons with disabilities at the level of Chief Director. The employment of persons with disabilities also significantly cascades to the senior management cadre of the Department.

In addition, the Department has established an Employment Equity Committee, and also has a human resources policy. Disability features prominently in both. The Strategy will support the efforts of the relevant directorates to increase the number of employees with disabilities employed in various occupational categories at the Department. All branches will be required to set targets for employing staff with disabilities in line with the relevant legislation.

5.6 Economic Empowerment

It is common knowledge that people with disabilities are among those affected by poverty. Poverty coupled with a lack of proper jobs among other things, thereby relegating such groups to dependence on social grants. Within the Broad-Based Black Economic Empowerment Strategy of the Department, the Strategy will influence the process to ensure that the targets are monitored and that consideration be given to companies and organisations that are managed and led by persons with disabilities. SOEs will be encouraged to consider persons with disabilities and their companies or organisations when inviting preferential tenders for services, such as printing business cards, developing



disability awareness campaigns and sensitization programmes, Braille services for documents in preparation for meetings, and other similar services.

Economic empowerment will also require the tender processes and structures are disability inclusive to ensure that entrepreneurs with disabilities benefit and increased number of tenders awarded to companies owned by persons with disabilities. Advice on key aspects of disability will also be provided to the Departmental Tender Committee.

5.7 Disability Mainstreaming at International Forums and Programmes

The Department is a signatory on behalf of the Government and has agreements with a number of influential International multilateral institutions. The Department's involvement in these institutions has caused it to play a key role in their ICT activities. These institutions include: the International Telecommunications Union (ITU) and its structures including the regional body the African Telecommunications Union (ATU), the Universal Postal Union (UPU) and the regional institution for Africa the Pan-African Postal Administration Union (PAPU) and other similar institutions under the United Nations including the United Nations Economic Commission for Africa (UNECA). All these institutions provide opportunities in the lives of people with disabilities. As a new, evolving issue, the disability dimension is overlooked in most of their agendas and programmes. The ITU hosted the World Summit on Information Society (WSIS) in 2003 and 2005. This was in recognition of the challenges and opportunities posed by the rapid technological advances and the need for harnessing all human potential in the bridging of the digital divide. ICTs have become an important tool for development and lack of access to information has resulted in the further marginalization and the general exclusion of communities including person with disabilities. WSIS also address the issue of disability inclusion and integration in the information society agenda which gave impetus to other UN resolutions, including Resolution 37/52, adopted by the UN General Assembly, 3rd December 1982, on the World Programme of Action Concerning Disabled Persons. One of the aims of the World Programme of Action is to ensure full participation and inclusion of the disabled in all aspects of life. In recognition of this objective, the Department of Communications in conjunction with SADC hosted a SADC Disability Conference in order to promote an inclusive Information Society, which eliminates cultural, social, technological and economic gaps as well as to ensure an inclusive Information Society that promotes empowerment amongst all people. The SADC Conference on building an inclusive information society, PAMJOA 2005 recognizes that people with disabilities are one of the most marginalised sectors of society and that there is a need as government, civil society and business to improve issues of access in line with the Standard Rules and WSIS objectives. The ITU has adopted a resolution on ICT Accessibility and Access to Telecommunication services for Person with Disabilities in October 2010.

The Strategy will seek to influence the mainstreaming of disability in all multilateral and bilateral forums and agreements to ensure that the core business of these institutions is disability inclusive. Furthermore, it is envisaged that, in order to promote the principle of self-representation in these activities, the Strategy will ensure that persons with disabilities attend and participate in such forums to gain exposure and to promote an understanding of this sector and its challenges. Such participation will allow the ICT sector to gain insight into the needs of persons with disabilities and to incorporate their needs in the design of



new products, strategies and services, rendering them accessible to and user-friendly for all. The Strategy will also facilitate a process on implementation of the various resolutions passed by the ITU and the other UN bodies related to Disability Mainstreaming and ICTs.

5.8 Ensure that the ICT Infrastructure is Accessible, Robust, Reliable and Affordable to Support a multiplicity of applications and Services

Improved access to information for persons with various types of disabilities via the broadcasting services by introducing minimum access standards in the following areas:

- o Broadcasting services in accordance with the Digital Migration Strategy
- o Radio programming
- o Telecommunications, facilities and services
- o Internet services
- o New and existing products and services
- o Postal services for the blind and partially sighted
- o All national DPOs are connected to the Internet (a website for the disability sector has been developed and handed over).

6. TOWARDS AN INTEGRATED DISABILITY & ICT STRATEGY

6.1 Facilitation of Disability Mainstreaming

The Strategy has outlined performance targets and indicators for each of the priority areas. Through the Disability Mainstreaming Directorate the Department will handle all aspects of coordinating and facilitating the implementation of the Strategy. This will be effected in collaboration with the structures to be created for this specific purpose. Through the GDYC Chief Directorate the Department will:

- Appoint the Disability Mainstreaming Directorate to serve as the secretariat for all the committees and structures;
- Provide contributions and advice to the Department on policy issues in respect of persons with disabilities;
- Coordinate the implementation of disability programmes, projects and policies, including overseeing the implementation of the Strategy;
- Facilitate the creation of institutional mechanisms/committees and forums to effect the implementation of the Strategy;
- Coordinate annual advocacy and sensitization programmes on disability issues;
- Engage the disability sector, SOEs and the ICT sector to mainstream the disability dimension in their programmes, policies and strategies, and submit quarterly updates to the Management of the Department on key issues arising from these interactions with stakeholders;



- Liaise with the Department for Women, Children and Persons with Disabilities on key implementation of the Strategy, prepare and submit progress reports in this regard; and will
- Represent the Department at disability forums and other disability activities, at local and international level.

In terms of these, reporting formats will be developed in consultation with all stakeholders. The implementation of the Strategy will adopt a collaborative approach to ensure that all stakeholders cooperate and participate in the process for the success of the Strategy. Internally, Branches and SOEs will be expected to submit quarterly reports via their focal points, as agreed between them and the GDYC Chief Directorate. The Disability Directorate will provide support to all Branches on the implementation of the Strategy and will also facilitate training and institutional capacity development to ensure effective implementation.

6.2 Roles and Responsibilities of Stakeholders

6.2.1 The Role of the Department of Communications

In order to fully implement the Disability & ICT Strategy, the DoC will develop a Monitoring and Evaluation system with clearly defined programmes that mainstream disability. This is of absolute importance for participating Branches within the DoC and within the Portfolio Organisations and ICT Sector companies so that the integration and mainstreaming of disability ICT programmes are given the consideration, attention and support needed to ensure that such programmes are successful and sustainable. The DoC will adopt a partnership approach where organisations give it the mandate to help them conceptualise, plan and implement programmes.

As is the case in all evaluation processes, DoC will develop the relevant monitoring and evaluation Indicators, Standards and Criteria in order to effectively evaluate the work done by the various stakeholders. The process must be in consultation with all stakeholders; should not be prescriptive but rather adopt a partnership approach.

The Monitoring and Evaluation of programmes could also be incorporated into the Performance Management System of stakeholder organizations and the Branches of the Department, with Key Priority Areas being clearly identified. The proposed Disability ICT Accessibility Forum would also assist in the monitoring, evaluation and review of programmes and projects implemented by the Department and all participating stakeholders including Portfolio Organisations.

6.2.2 The Role of the Regulator

In addition to establishing the Standards and Criteria for monitoring projects within DoC and the Portfolio Organisations, it has been suggested that the GDYC Chief Directorate should explore the possibility of ICASA the Regulator playing a role in this process and ensure the sustainability of projects.

The way forward that the Strategy suggests is for the Department and the GDYC Chief Directorate to immediately begin an exploration exercise with ICASA that



would eventually lead to the actualisation of this objective which is to ensure that ICTs are accessible, available and affordable for the persons with disability. Issues such as roles, responsibilities, infrastructure and finances would have to be discussed so that there is absolute clarity regarding the expectations of the Regulator.

Some of the measuring criteria that could be used are:

- Incorporation on persons with disabilities specific Technical Standards on Infrastructure development guided by the Universal Design Standards as adopted by Local Standard bodies;
- Evaluation of Universal Service Obligations being met in collaboration with USAASA.
- Evaluation of cost factors and looking at funding ways for new initiatives.
- Enforcement of the Code on the needs of persons with disabilities and all other related codes passed by the regulator

6.2.3 The Role of State Owned Enterprises

The State Owned Enterprises could, through their shareholder compacts, put in place or formulate individual strategic frameworks to promote awareness and policy support for accessible ICTs in their corporate environments. They would need to develop corporate approaches with their own specific standards and criteria for the equitable and sustainable availability of their individual product offerings and take into account the special needs persons with disabilities.

State-owned enterprises will be expected to play a role in implementing the Strategy by actively participating in the implementation process. They will be expected to develop their own individual strategies and implementation plans. The functions of the SOE's include:

- Developing internal disability policies and strategies and incorporating disability in the company's corporate business and annual reports;
- Setting up institutional arrangements, including setting up disability focal points at the CEO's offices of all SOE's;
- Setting up internal disability forums to ensure that disability issues are mainstreamed in all areas of the company;
- Conducting annual public awareness and advocacy programmes on disability and on the opportunities available in the company that benefit persons with disabilities, including amongst others, bursary schemes, funding models; facilities and products;
- Engaging the disability sector on key factors that impact on persons with disabilities;
- Improving accessibility to their programmes, facilities and new products;
- Participating in the department's disability ICT Forum activities;
- Allocating financial and other resources for the implementation of disability programmes; and;
- Submitting progress reports on the implementation of their programmes in support of the Strategy.



6.2.4 The Role of Other Government Departments and State Institutions

The promotion of the use of ICTs in the implementation of disability mainstreaming programmes is an achievable goal by other government departments. It would be beneficial to persons with disabilities for government departments to include basic computer literacy training in their development programmes especially their training components to heighten awareness and sensitization about disability matters. Government departments should also provide reasonable accommodation for the specific needs of employees with disabilities and support for exit opportunities for persons with disabilities and ICT related trainees to apply their newly acquired skills on a real work environment and absorption where possible.

6.2.5 The Role of the Private Sector

The private sector depending on their core businesses should provide support on amongst others;

- i. Resource support to promote access to higher and further education by persons with disabilities within the ICT field.
- ii. Assist in the implementation of the student support services programme as outlined in the Youth and ICT Strategy (including the provision of hardware and software).
- iii. Support for ICT disability development programmes implemented in rural communities.
- iv. Support for the implementation of the e-Cadre Programme as the NYS Flagship of the Department to enhance the employability of young people with disabilities within the ICT sector.
- v. Support for disability ICT SMMEs through the preferential procurement policies
- vi. Promote the increase of bursaries, learnerships and internships for learner with disabilities in the ICT sector to enable them to enter the labour market.

6.2.6 The Role of Funding Organisations

The challenges for disability development often exceed the available state resources. Funding for disability development programmes is always needed. Funding organisations are encouraged to partner with the department through the GDYC Chief Directorate to implement disability development programmes. Disability entrepreneurs need access to funding for them to be able to start or expand their businesses. The ICT enterprises are not always easily understood due to their complex technical nature. Support to entrepreneurship development will not only contribute positively to young people with disabilities participating in the economy but, it also stands to address one of the most critical issues for disability development-employment and jobs creation.

6.2.7 The Role of International Organisations and Embassies

The International Organisations and Embassies provide a gateway to programmes and development programmes of different countries. This provides an ideal platform for collaboration, sharing of best practices and offering of development aid where



possible.

The International Organisation and Embassies will also provide the GDYC Chief Directorate with information of, amongst others: forums, conferences, exchange programmes and other ICT development programmes that South Africans can benefit from. They can also facilitate opportunities for persons with disabilities through the offering of development support to Disabled Peoples Organisations (DPOs).

7. COORDINATION

Implementing the Strategy requires the creation of structures with clear mandates and responsibilities to support and augment the work of the Disability Directorate. The following institutional arrangements will be made in a bid to build institutional capacity so that policies that benefit people with disabilities can be implemented effectively:

7.1 Internal Disability Committee (IDC)

To ensure a sustainable internal advocacy, awareness campaigns and sensitization programmes, an internal forum will be set up comprising all the nominated disability focal points. The forum's terms of reference (ToR) will outline and provide guidelines on how it will champion and facilitate the mainstreaming of disability programmes of all the branches of the Department. All the heads of branches will be required to identify an official in each of their respective branches to represent their branch on disability activities and to coordinate the implementation of these activities within each branch. The ToR of this committee will need to be acknowledged and approved by the Department's senior management to ensure accountability. The performance agreements of all nominated officials will have to incorporate their duties in terms of disability activities.

7.2 Disability Focal Points

In accordance with the National Disability Policy Framework, all ministries are expected to allocate dedicated disability focal points that report to the Director-General. The purpose of these focal points is to provide access to decision-making officials and, in the process, to fast track the implementation of mainstreaming programmes. The Department has already established such a dedicated point in the form of the Disability Directorate, which provides, as its mandate, the support, coordination and monitoring of all aspects of implementing disability policies, programmes and projects.

All SOEs will be required to create focal points at their CEOs' offices and will be held directly accountable to their CEOs. The focal points will be responsible for mainstreaming and implementing disability programmes in the various areas served by the relevant branches within the Department and at SOEs.

7.3 Disability ICT Accessibility Forum

The Department of Communications works in collaboration with its State-Owned Enterprises. As the service-delivery arms of the government, SOEs have a specific role to play in improving service delivery to persons with disabilities, hence the need to establish and strengthen collaboration and partnerships in respect of disability-related matters.



It is in this context that the Department plans to set up a disability focal points preferably at the offices of CEO's to ensure proper accountability. These will then together become an ICT forum between state-owned enterprises and the Department. The forum will be responsible for entrenching the mainstreaming of disability into all aspects in the work of the various state-owned enterprises reporting to the Department.

The forum will also engage and influence suppliers and manufacturers of ICT equipment and facilities i.r.o. the design and production of products, facilities, equipment and services to ensure that these are user friendly for persons with disabilities. The Disability Directorate will provide secretarial services to all the structures. The forum will require the endorsement of the senior management of each state-owned enterprise and of the Department. All sectoral campaigns will be coordinated in consultation with this structure to ensure information sharing, exposure and capacity building. All SOEs will be approached to nominate representatives.

It is suggested that the responsibilities referred to above be incorporated in the performance agreements of all officials nominated in these structures in order to ensure accountability.

7.4. Disability High-Level Focus Group

The Department acknowledges the fact that some disability issues and aspects may require specialist groups or individuals to apply their expertise in specific areas to assist the Department in mainstreaming disability. Some of these issues may require attention and discussion prior to being finalised at open forums, where there are other (dissimilar) stakeholders. In this regard, a high-level disability focus group will be established and facilitated as a contact point for assistance on an Ad Hoc bases, participation and guidance on key disability aspects, including various technical matters.

8. MONITORING AND EVALUATION

To ensure that implementation is monitored and that progress is made in achieving targets, the Strategy outlines the following performance indicators:

8.1 Ensure that the ICT Infrastructure is Accessible, Reliable and Affordable to Support a multiplicity of applications and Services:

By the end of 2015 the number of persons with disabilities with access to information through various media, including television and radio, will be more than one million. At least eighty per cent of the total number of organisations for persons with disabilities will have been connected to the Internet. A directory of services benefiting persons with disabilities will be developed and disseminated to all DPOs and available in access points. Copies in other accessible formats will be available on request.

8.2 Accelerate the Socio-Economic Development of South Africans by increasing access to, as well as the uptake and utilisation of, ICTs through partnerships with business and civil society:

At least two hundred learners with disabilities will have graduated from various skills development programmes at various institutions. The two per cent target of employed persons with disabilities will have been achieved by 2015.



8.3 Enhance the role of the ICT's SOEs as the delivery arms of the Government:

All SOEs will have disability focal points (DFPs) located at their CEOs' offices, and training will have been provided to all focal points. A disability ICT forum will have been established. A disability awareness and sensitization workshop will have been held at each SOE.

8.4 Contribute to Building an Inclusive Global Information Society, while prioritising Africa's Development:

All multilateral and bilateral agreements will have included the disability dimension. Participation in all international conferences will have occurred, and annual inputs made to commemorations and/or discussions. Support in the participation and involvement of persons with disabilities will have been provided in at least eighty per cent of annual international and national events.

9. MARKETING AND COMMUNICATION

9.1 External Stakeholders

An external communication Strategy will be developed in collaboration with the Communications Chief Directorate to ensure that information on the Department's projects reaches the DPOs and people with disabilities in accessible formats. Reasonable efforts will be made to render information on departmental opportunities and projects available to people with disabilities and/or their representative provincial organisations. The Department will encourage collaboration and partnerships with local authorities to ensure that people with disabilities are able to access this information closer to home.

The Marketing and Communication Strategy will assist in integrating the work of the GDYC in respect of access to information and communication technologies, taking into account the specific needs of people with disabilities. The Strategy also implies entering into partnerships with organisations that provide services to people with disabilities thereby assisting the Department in improving access to information on programmes that benefit these designated groups.

The Marketing and Communication Strategy will also help to maintain a high rate of utilisation and enhance the Department's profile and image. A strong promotional campaign creates expectations, helps gain and maintain acceptance and assures the continued use of the Department's services in terms of promoting the interests of persons with disabilities.

9.2 Internal Stakeholders

The GDYC will seek to enhance information dissemination internally to promote an understanding of disability and the Department's work in improving access to its services and information. The measures include the Department's website, e-mails, presentations and discussions facilitated by the Internal Disability Committee. The purpose of these measures is to ensure that staff receive information on the work being done i.r.o. disability and that they are fully informed of the key messages that should be communicated to stakeholders concerning services, facilities and benefits to persons with disabilities. Such measures will be implemented in conjunction with the Communications Chief Directorate.



10. CONCLUSION

Developments in both the field of disability and the ICT sector necessitate a change of emphasis from a traditional approach to a new, people-centred and community-driven approach to service delivery. The shift in perspective from viewing disability as a medical model to that of a social model with a human rights approach places an obligation on all sectors of society and service providers. This paradigm shift thus calls for pragmatic approaches to achieve the goal of universal design and access to services for persons with disabilities.

Achieving such goals demands an innovative means of harnessing the latest technological advances to influence the manner in which companies conduct their normal business operations. Technological advancements have made it easier to reach various communities and to provide services to them at minimum cost. This document is one of the measures used in the implementation of the Department of Communication's medium-term Strategy to ensure that developments in the ICT sector take into account the needs of people with disabilities.

The Department of Communications is committed to addressing the needs of people with disabilities by partnering with them and the various stakeholders of the sector. A strategic document should be dynamic and flexible enough to embrace change, thereby rendering it a work in progress. Contributions from various stakeholders were considered and are welcome, since such contributions assist in continued development to ensure that people with disabilities have access to ICT facilities and infrastructure.







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