SkillsFuture Accessibility and Inclusion

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The Disabled People's Association (DPA) strongly acknowledges the importance of the SkillsFuture system, and the government's efforts, especially in recent years in intentionally developing and investing in the SkillsFuture system - such as the recent SkillsFuture Level Up Programme and the SkillsFuture Job Seeker Support Scheme.

SkillsFuture is a vital asset with much potential in establishing a system where Singaporeans can acquire new skills and capabilities in an ever-changing and volatile global economy. The SkillsFuture system must thus be optimally inclusive and accessible to the disability community, to ensure that persons with disabilities can benefit from initiatives around the SkillsFuture system and the overall SkillsFuture system itself on an equitable level to our non-disabled peers.

However, as it is currently, based on our research and conversations with persons with disabilities, DPA believes that there is significant room for improvement for the SkillsFuture system to be optimally inclusive of and accessible to persons with disabilities – especially around the provision of reasonable accommodations.

For example, there currently are no requirements for training providers to provide reasonable accommodations to learners with disabilities. Persons with disabilities have informed us that it is fairly common to encounter not only accessibility barriers in SkillsFuture courses, such as course materials not in accessible formats, but that it is also fairly common to come across training providers who are not willing to provide reasonable accommodations. In a number of particularly errant cases, the training provider would not even have a conversation with the person with disability to explore reasonable accommodation options despite the person with disability being willing to educate. Persons with disabilities have additionally noted issues such as lack of protocols in place to request reasonable accommodations – especially in important areas of the course such as exams.

Persons with disabilities have informed us that such access and attitudinal barriers often lead to them facing significant difficulty in completing or even participating in SkillsFuture courses.[i]

The Importance of an Accessible and Inclusive SkillsFuture System

While we acknowledge the efforts by the government to provide lifelong learning opportunities to persons with disabilities through the Enabling Academy – a separate learning hub designed solely for persons with disabilities, it is important that the SkillsFuture system itself be enhanced in terms of accessibility and inclusion to optimise participation of persons with disabilities in SkillsFuture courses and programming. Below are three reasons:

(1) Optimising lifelong learning opportunities and social integration of persons with disabilities in Singapore

Firstly, we at DPA believe that the opportunities and courses offered through the Enabling Academy are important and necessary especially in the short term. However, we also believe that to truly create an equitable landscape of lifelong learning in Singapore, we must also work towards a SkillsFuture system that is inclusive and accessible.

While the Enabling Academy is important and will provide much needed opportunities for persons with disabilities to engage in lifelong learning, our concern is that the Enabling Academy alone may not be sustainable in the long term in pursuance of creating equitable opportunities for persons with disabilities. For example, while the curation of over 700 courses at the Enabling Academy over the span of several years are

efforts that are commendable, this still is a small fraction (less than 5%) of the over 20,000 courses offered through the wider SkillsFuture system.[ii] Persons with disabilities should not feel restricted to just the courses offered at the Enabling Academy, but rather have access to as many courses offered through the wider SkillsFuture system as possible. Additionally, as alluded, courses through the Enabling Academy are also only available to persons with disabilities and thus focusing on optimising accessibility and inclusivity within the wider SkillsFuture system will better assist efforts in promoting social inclusion and integration within Singapore society between persons with and without disabilities.

(2) Enhancing economic prospects and reducing economic inequities for persons with disabilities in Singapore

Secondly, ensuring accessibility and inclusion in the wider SkillsFuture system is necessary to optimise the economic prospects and reduce economic inequity for persons with disabilities in Singapore. Currently, the employment rate of persons with disabilities is less than half that of the general public at 32.7% to 66.2% respectively.[iii] Additionally, according to the most recent national census in 2021, where disability-related data was included for the first time, persons with disabilities are over-represented in the lower-income brackets – with persons with disabilities comprising 6.93% of the total resident employed population aged 15 years and older, but comprising 12.03% of those who earn below $2,000/month.[iv] Additionally, according to our own DPA research, under-employment, whether time-related or skills-related under-employment, is one of the more common concerns expressed by persons with disabilities on the topic of employment.[v]

According to MOE statements, annual surveys on SkillsFuture work-study programmes consistently show that "more than 90% of the trainees were employed within six months after completing the programme. Their median salaries were also higher than what they received at the start of the programme".[vi] Therefore, if persons with disabilities had better access and assurance to reap the full benefits of the SkillsFuture ecosystem as much as possible to that of persons without disabilities, it will no doubt improve economic outcomes for the better for the disability community in Singapore.

(3) Bringing Singapore closer to international best standards of disability inclusion found in the UN CRPD

Thirdly, working to optimise accessibility and inclusion within the SkillsFuture system itself is important to bring Singapore closer to international best standards – especially those found in the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) – which Singapore is a state party to, having ratified the UN CRPD in 2013. In Article 27 of the UN CRPD, it notes that state parties are to provide "effective access to general technical and vocational guidance programmes, placement services and vocational and continuing training".[vii] When elaborating on this aspect of Article 27, the UN Committee on the Rights of Persons with Disabilities noted in their General Comment on Employment that realising effective access for persons with disabilities in vocational training needs to include services that promote "non-segregation", and that state parties should "take measures to ensure the certification of capacities and attainments on an equal basis with others, the explicit inclusion of persons with disabilities in legislation dealing with vocational training", and ensure "explicit references to persons with disabilities in general policies regulating vocational training", and "the accessibility of premises, information and materials".[viii]

DPA Recommendations
To work towards a SkillsFuture system that is optimally accessible and inclusive, DPA would like to put forth the following three recommendations:

Recommendation 1: The necessity of a mandatory protocol for the assessment and provision of reasonable accommodations

Reasonable accommodations, as outlined in its definition in the UN CRPD, are essential and necessary modifications or adjustments, not imposing an undue burden, in a given case or setting for persons with disabilities to participate equitably in settings including in lifelong education.[ix] The UN Committee on the Rights of Persons with Disabilities has issued guidelines such as through their General Comment on Equality and

Non-Discrimination on criteria that entities can use in assessing what is considered as "reasonable" so as to not produce an undue burden – criteria such as whether there is availability of technical and/or financial assistance to the provider of reasonable accommodation.[x]

For example, if an educational setting receives an accommodation request, such guidelines from the UN Committee on the Rights of Persons with Disabilities recommend a set of criteria or questions that can be put in place to assist such a setting in objectively determining whether or not the accommodation request is reasonable. Examples of such criteria/questions can include whether or not the accommodation request requires financing and if so, whether or not grants available to the provider of reasonable accommodation are sufficient to match such financial costs, whether or not there is technical assistance to the provider of reasonable accommodation in implementing the accommodation (especially if the provider is not familiar with implementation of the given accommodation), etc.

Through such criteria, reasonable accommodations by definition do not pose an undue burden, and simultaneously provide the modifications that are necessary for as many persons with disabilities to participate in a given setting as possible.

In the case of the SkillsFuture system, there should be strong protocols in place to ensure that the assessment and provision of reasonable accommodations are required to be objectively conducted as outlined and not be left to the complete discretion and potential implicit biases of individuals or individual training providers. To be clear, we are not calling for all accommodation requests by persons with disabilities to be granted, but rather we are calling for a mandatory protocol to be in place in the SkillsFuture system for accommodation requests to be assessed fairly and as objectively as possible, and for such a protocol to assist in the timely and fair provision of accommodations assessed or found to be reasonable.

In terms of what such a mandatory protocol in the SkillsFuture system could look like, below is an example:
- There should be a standardised accessible online channel in place in all SkillsFuture courses for persons with disabilities to indicate/submit accommodation requests
- There should be a clear template in place that outlines criteria for training providers to use in assessing whether such accommodation requests are reasonable. Such criteria should be based on standards as outlined in the UN CRPD Committee General Comment on Equality and Non-discrimination
- There should be a clear requirement in place that training providers must assess accommodation requests submitted, and that training providers must assess accommodation requests according to the afore-mentioned criteria based on standards found in the UN CRPD Committee General Comment on Equality and Non-discrimination. If the training provider should assess an accommodation request as unreasonable, the training provider should explain to the person requesting the accommodation why they have assessed the accommodation request as unreasonable according to the afore-mentioned criteria based on standards found in the UN CRPD Committee General Comment on Equality and Non-discrimination. The training provider should then engage with the person requesting the accommodation to discuss if a compromise can be reached again using criteria based on standards found in the UN CRPD Committee General Comment on Equality and Non-discrimination to guide the conversation
- There should be an independent body in place – which includes persons with disabilities - to assist or mediate in cases where there are disputes or disagreements between the training provider and person requesting the accommodation on whether the accommodation request is reasonable.
- There should be a clear requirement that training providers must provide accommodation requests assessed or found to be reasonable
- There should be an office within the SkillsFuture system that can provide technical assistance to training providers in the assessment of accommodation requests and/or the provision of accommodation requests assessed or found to be reasonable

Recommendation 2: Additional government funding in annual budgets to enhance capabilities of SkillsFuture accessibility and inclusion

Over the past year and a half, SkillsFuture accessibility and inclusion has been one of our key policy advocacy areas. We have highlighted this issue and various points raised in this document in our reports and blog articles on our website, writing into the Straits Times forum, and working with various members of Parliament (MPs) to raise this issue in various Parliament sittings.

We have also raised this issue and such points directly with SkillsFuture Singapore (SSG) and we must emphasise that they have been responsive and active in working with us to implement a few important changes. For example, we have worked with SSG on various resources, including a seminar for over 100 SSG training providers. We also understand that SSG has put in place a referral channel for training providers to contact SSG and entities such as SGEnable should training providers need assistance on the provision of reasonable accommodations. This is in addition to the Capabilities Development Grant (CDG) which provides funding for training providers to tap on should training providers require funds for the implementation of reasonable accommodations.

The CDG and such recent additions by SSG are important in providing necessary resources for accessibility and inclusion such as the provision of reasonable accommodations. However, without any firm requirement for reasonable accommodation protocols, it is still up to the training provider to tap on such resources. Without a clear protocol in place for training providers to assess accommodation requests objectively, and without a firm requirement for training providers to provide accommodation requests assessed to be reasonable, we are concerned that persons with disabilities will continue to face a lack of certainty and difficulty in attaining important reasonable accommodations, and hence still face access and inclusion barriers in the SkillsFuture system.

We thus recommend for a mandatory protocol as illustrated in Recommendation 1 above to be in place. We also recommend that the government can step in to assist in the establishment of such a protocol especially by dedicating funding to such objectives.

As the government makes preparations for Budget 2025, we recommend that the government can look to ensuring that intentional funding is set aside to improve the capabilities of SSG in the implementation of such a mandatory protocol (as exemplified/proposed above) to ensure the fair assessment and timely provision of reasonable accommodations. Such funding can go towards technical upgrades to the SkillsFuture system to ensure a clear online channel for persons with disabilities to submit accommodation requests, and the establishment of an office to provide technical assistance in the assessment and/or provision of reasonable accommodations. We recommend that such steps in the budget can and should be taken not only for Budget 2025, but also for subsequent annual budgets that involve enhancements to the SkillsFuture system.

Recommendation 3: Long-term planning for disability-inclusive policies in SkillsFuture from the get-go

Going forward and in the long-term, we recommend that the government develops protocols in and around SkillsFuture to ensure that the barriers faced by persons with disabilities are addressed and taken into consideration from the get-go in the planning, design, and/or implementation of upgrades, programmes, or initiatives surrounding or involving the SkillsFuture system. This is important to ensure that persons with disabilities can benefit from such upgrades, programmes, and initiatives surrounding or involving the SkillsFuture system as equitably as possible with our non-disabled peers.

For example, pertaining to upgrades, programmes, or initiatives surrounding the SkillsFuture system, as outlined, we note the government's efforts in recent years – whether it be the Job-Skill Integrators Programme or financial incentives such as SkillsFuture Level Up Programme and the SkillsFuture Job Seeker Support Scheme. We have previously (upon the announcements of such programmes and initiatives) commented on how such programmes and initiatives can be inclusive of the disability community.[xi] We hope that the government will take into consideration such recommendations.

Overall, for persons with disabilities to benefit as equitably as possible from such upgrades, programmes, and initiatives surrounding the SkillsFuture system, the SkillsFuture system itself must be as optimally accessible and inclusive as possible. Hence, in addition to our recommendation of a mandatory protocol to assist in the assessment and provision of reasonable accommodations, and the intentional setting aside of funding from the government to improve capabilities of the SkillsFuture system to assist in the implementation of such a mandatory protocol, we recommend that as a long-term goal, protocols be developed to look into addressing accessibility and inclusion as much as possible from the get-go in SkillsFuture courses and programming.

For example, in Recommendation 1, we have called for the establishment of an accessibility office within SkillsFuture to assist in providing technical assistance to training providers in the assessment of accommodation requests and the provision of accommodation requests assessed or found to be reasonable. As noted, we acknowledge the important work that has begun on this with SSG establishing a channel of contact for training providers to contact SSG should they need such assistance, and we call for this to be expanded into a larger accessibility office within SkillsFuture and for such an office to be part of a mandatory protocol as illustrated. However, going forward and in the long-term, we hope that such an office can not only provide technical assistance in the assessment and provision of reasonable accommodations, but also in the incorporation of accessibility and inclusion in SkillsFuture courses from the get-go. This could include ensuring that new courses developed follow particular basic guidelines on accessibility – such as the incorporation of alt-text on images and transcripts/captioning on videos in any course materials.

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As alluded, the points and recommendations raised in this document is a consolidation of publications and our advocacy work over the last year and a half around the issue of SkillsFuture accessibility and inclusion. We hope that the points and recommendations outlined in this document will assist in optimising accessibility and inclusion within the SkillsFuture system.

DPA welcomes further conversations and collaborations with new and existing partners on working together to address such objectives.

Endnotes

[i] For further examples of the access and attitudinal barriers faced by persons with disabilities in SkillsFuture courses and programming: Disabled People's Association (DPA) Singapore, 18 May 2023, "Ensuring Disability Inclusion in SkillsFuture Ecosystem is a Must as Singapore Looks to Refresh Its Social Compact," DPA.org.sg. https://dpa.org.sg/ensuring-disability-inclusion-in-skillsfuture-ecosystem-is-a-must-as-singapore-looks-to-refresh-its-social-compact/

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[iv] Department of Statistics, 2021, "Singapore Census of Population 2020, Statistical Release 2: Households, Geographic Distribution, Transport and Difficulty in Basic Activities," Singstat.gov.sg. https://www.singstat.gov.sg/publications/reference/cop2020/cop2020-sr2/census20_stat_release2

[v] Disabled People's Association (DPA) Singapore, March 2024, "Achieving Fairness in Employment for Persons with Disabilities in Singapore," DPA.org.sg. https://dpa.org.sg/wp-content/uploads/2024/04/Achieving-Fairness-in-Employment-for-Persons-with-Disabilities-in-Singapore.pdf

[vi] Ministry of Education, 28 February 2023, "MOE FY2023 Committee of Supply Debate Response by Minister of State for Education Gan Siow Huang," MOE.gov.sg. https://www.moe.gov.sg/news/speeches/20230228-moe-fy2023-committee-of-supply-debate-response-by-minister-of-state-for-education-gan-siow-huang#:~:text=Our%20annual%20survey%20on%20SkillsFuture,the%20start%20of%20the%20programme.

vii United Nations, "Article 27 | Convention on the Rights of Persons with Disabilities," https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-27-work-and-employment.html

viii United Nations Committee on the Rights of Persons with Disabilities, "CRPD/C/GC/8," United Nations. https://undocs.org/Home/Mobile?FinalSymbol=CRPD%2FC%2FGC%2F8&Language=E&DeviceType=Desktop&LangRequested=False

ix United Nations, "Article 2 | Convention on the Rights of Persons with Disabilities," https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-2-definitions.html

x United Nations Committee on the Rights of Persons with Disabilities, 26 April 2018, "General comment no. 6 (2018) on equality and non-discrimination," United Nations. https://digitallibrary.un.org/record/1626976

xi For an example of our previous commentaries: Disabled People's Association (DPA) Singapore, 15 February 2023, "DPA Statement on Budget 2023," DPA.org.sg. https://dpa.org.sg/dpas-statement-on-budget-2023/; Disabled People's association (DPA) Singapore, 21 August 2024, "DPA Recommendations on Announcements at NDR 2024," DPA.org.sg. https://dpa.org.sg/dpa-recommendations-on-announcements-at-ndr-2024/