

# A Commentary on the Singapore Government’s State Report to the Fourth UPR (a disability perspective)

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## (1) Introduction

The Singapore government (the government) recently went through their fourth Universal Periodic Review (UPR) – a process at the United Nations (UN) where countries have their human rights record peer reviewed every four – five years.

As part of the review, the country’s government under review – in this case, the Singapore government – submitted their state report – a submission to the UPR working group outlining the government’s take on the state of rights protections in the country.<sup>i</sup>

The UPR is thus an opportune time to assess the state of rights protections of a nation. Towards this purpose, and as an independent cross-disability advocacy group in Singapore, we at the Disabled People’s Association (DPA) take this opportunity to assess and respond to the government’s state report – especially from a disabled-led civil society organisation (CSO) perspective.

The purpose of the following is not to criticise, but to reinforce various points and recommendations we have made in our own submission to the fourth UPR.<sup>ii</sup> We hope that our submission to the fourth UPR, along with our analysis and commentary below, may also serve to deepen the dialogue around disability in the general public.

We acknowledge the work and efforts of the government and civil service, and we are appreciative that we have been able to share and engage in dialogue with them on a number of our recommendations.

As we note in our submission, our points of recommendation are not intended to disparage the efforts of the government nor of civil service, but to simply offer our independent assessment of the gaps that remain as we advocate for Singapore to be more aligned with best standards such as that found in the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

## **(2) Analysing the government’s overall approach to human rights**

The government opens their state report with several clauses outlining their overall approach to human rights. Following this, the state report contains various sections outlining the government’s policies and initiatives on various topical areas since its last UPR in 2021.

Before taking a look at the specific paragraphs in the government’s state report directly pertaining to disability, it is fitting to first briefly examine what the government has noted pertaining to how it approaches the topic of human rights.

In the opening paragraphs of their state report, the government outlines their approach to human rights. For instance, in paragraph 2, the government cites its ranking as one of the safest countries in the world as evidence for its “sustained commitment to the progress of human rights”.<sup>iii</sup> More specifically, in the endnotes of their state report, the government cites the 2024 Gallup Law and Order Index – where Singapore ranked second out of 140 countries.<sup>iv</sup> The 2024 Gallup Law and Order Index focuses on public safety and asks respondents on their experience with violent crime and theft, along with their confidence in local law enforcement and police.<sup>v</sup>

Indeed, public safety is an important aspect of rights protections, and should not be taken for granted. Yet, there are other aspects that need to be considered when assessing the state of human rights in a country. For example, other aspects include the absence or presence of structures to address discrimination in all its forms, how a country is promoting equal and equitable participation in everyday spaces, and how the laws of a country themselves do or do not conform to best international standards such as that found in the UN Conventions. These are aspects outlined in the Universal Declaration of Human Rights (UDHR) and in the UPR Working Group’s assessment based on key UN documents.<sup>vi</sup>

The government is correct to note in para. 4 of their state report for the need for an approach to human rights to be “outcomes-based”.<sup>vii</sup> However, such other aspects, according to international best practice, should be included as well in targeted outcomes.

The full implementation of certain rights protections under key UN conventions may require progressive realisation over time – particularly where economic capacity and different national circumstances affect the implementation of protections. However, while the implementation of rights

protections through laws and policies may be shaped by particular circumstances and contexts of a country, the UDHR affirms that the goal of rights protections is non-negotiable.

In other words, while national contexts may shape how rights are implemented, it should not be used to justify the indefinite delay or denial of rights protections. Governments must always aim towards the outcome and goal of rights protections especially how they are defined in important UN conventions.

For example, when assessing the state of the rights of persons with disabilities in Singapore, the implementation of protections should take into account national circumstances such as the economic capacity of a country. However, the standards set out in important conventions such as the UN Convention on the Rights of Persons with Disabilities (UNCRPD) should be benchmarks that countries - including Singapore - aim towards and utilise in evaluating the state of rights protections. This is especially so as the government has ratified the UNCRPD in 2013.

The standards of the UNCRPD are an important metric in assessing the state of disability inclusion and rights in Singapore. It is the metric to which we at DPA formulated our independent assessment in our submission to the fourth UPR. And it is an important metric to use when analysing the government's points in their report directly pertaining to disability.

### **(3) Analysing disability-specific paragraphs in the government's state report to the fourth UPR**

Section IV.D (para. 33 – 42) in the government's state report to the fourth UPR pertains specifically to persons with disabilities. Following a brief introduction, the state report covers six topical areas. We examine each one in the following.

#### **(a) Introduction (para. 33 – 34)**

Para. 33 notes the Enabling Masterplan 2030 (EMP2030), and how the Enabling Masterplans – including the current iteration of EMP2030 - coordinates the government's efforts in promoting disability inclusion.<sup>viii</sup>

EMP2030 sets out important goals and targets. However, as we briefly note in our submission to the fourth UPR, there are notable areas that EMP2030 does not address especially when analysed in the context of the standards of the UNCRPD.

In our submission, for instance, we note that while it is commendable that EMP2030 sets a 40% employment rate for persons with disabilities by 2030, there are other important aspects of employment outlined in Article 27 of the UNCRPD that need to be addressed – such as reasonable accommodation provision.<sup>ix</sup> Additionally, we note that while it is commendable that EMP2030 has set a target of 100% of all high-traffic government websites to be fully accessible by 2030, there are other important aspects of the digital world that EMP2030 does not address. This includes the need for accessibility standards for digital platforms (i.e. mobile applications and websites) run by the private sector.<sup>x</sup> Establishing such standards are important for Singapore to be aligned with Article 9 of the UNCRPD which does emphasise the need to “ensure” accessibility in services run by “private entities”.<sup>xi</sup>

Para. 34 notes the government's first meeting with the UN Committee on the Rights of Persons with Disabilities in 2022 as part of its obligations of ratifying the UNCRPD.<sup>xii</sup>

After the 2022 meeting, the UN Committee on the Rights of Persons with disabilities published a Concluding Observations report (CO) which provides important insight on areas for improvement needed in Singapore to achieve the standards of the UNCRPD.<sup>xiii</sup> We outline some of such areas in our submission to the fourth UPR and in this analysis.

### **(b) Lifted Singapore's reservation on Article 25(e) of the CRPD (para. 35)**

Para. 35 of the government's state report outlines their take on their reservation of Article 25(e) of the UNCRPD – which the government lifted in December 2025.<sup>xiv</sup>

When a country's government ratifies a UN Convention such as the UNCRPD, they have the opportunity to place what is known as "reservations" on particular clauses of the convention – essentially explicitly noting their opposition to a given clause(s). When the Singapore government ratified the UNCRPD in 2013, they placed three reservations, one of which was on Article 25(e) which notes that states must "prohibit discrimination against persons with disabilities in the provision of health insurance, and life insurance where such insurance is permitted by national law, which shall be provided in a fair and reasonable manner".<sup>xv</sup>

The government originally placed its reservations on Article 25(e) due to its intent to cater to the interests of private insurers.<sup>xvi</sup> However, it removed its reservation after the Monetary Authority of Singapore (MAS) revised their guidelines for insurers in 2024.<sup>xvii</sup>

The government removing its reservation on Article 25(e) should be celebrated – it is undoubtedly a positive step towards the goal of rights protections of persons with disabilities in Singapore.

However, the question remains of whether or not there are sufficient structures in Singapore to realise Article 25(e). In other words, are there significant laws and policies in place to prohibit discrimination in the provision of health insurance in Singapore?

It is difficult to answer this question in the affirmative. The guidelines that MAS enhanced in 2024 firstly remain as guidelines – not anti-discrimination legislation. Secondly, under the enhanced guidelines, private insurers simply have to provide a reason for why they are denying coverage. While the guidelines note that such reasons have to be based in objective criteria, the guidelines outline general principles insurers should follow rather than specific examples.

It is true that such criteria cannot be overly prescriptive due to the case-by-case nature of insurance provision. However, advocates have shared with us that the guidelines still leave too much discretion for private insurers to unilaterally define the perimeters of discrimination.

Several reports still show outcomes from assessments involving applicants with disabilities where the explanations for exclusion, higher premiums, or the need for additional assessments were unclear.<sup>xviii</sup>

In addition to general principles, clarifying and providing specific examples of utilising objective criteria in assessment will only enhance the process of accurately identifying cases of discrimination while reducing incidents of misunderstanding between insurer and client. More independent channels to oversee complaints in addition to MAS will also assist in identifying and clarifying incidents of discrimination. Legal professionals have also provided analysis that aims to shed light on Article 25(e) of the UNCRPD, which the guidelines can draw from.<sup>xix</sup>

While we celebrate the lifting of the government’s reservation of Article 25(e), we also need to note the much-needed room for improvement before discrimination on the basis of disability is truly prohibited in the provision of health insurance in Singapore.

### **(c) Legislative protection from discrimination (para. 36)**

Para. 36 of the government’s state report pertains to legislative protections from discrimination. It notes the Workplace Fairness Act (WFA) – Singapore’s first workplace anti-discrimination law codified in 2025. Para. 36 of the government’s state report notes that “The WFA now prohibits disability discrimination”.<sup>xx</sup>

However, as we highlighted in our submission to the fourth UPR, the WFA only pertains to the workplace and only prohibits direct discrimination on the basis of disability.<sup>xxi</sup> While a step in the right direction, there are many forms of discrimination that the WFA does not prohibit – i.e. indirect discrimination and denial of reasonable accommodations.<sup>xxii</sup> Yet, the UNCRPD General Comments on Equality and Non-discrimination and General Comments on Employment have noted that indirect discrimination and the denial of reasonable accommodations are forms of discrimination that must be prohibited.<sup>xxiii</sup>

Additionally, the definition of disability used by the WFA limits disability to physical disability, intellectual disability, sensory disability, and autism – potentially excluding disability types such as other forms of neurodivergence other than autism (i.e. ADHD, Tourette Syndrome, etc.).<sup>xxiv</sup>

Yet, there is a broader point that is important to analyse in this aspect of legislated protections. In para. 36, the government notes: “We regularly review our laws, policies, and measures to better implement our obligations under the CRPD across education, employment, and accessibility.”<sup>xxv</sup>

It is true that the government regularly reviews its laws and policies. However, what needs improvement is more information and clarity on how exactly the government is reviewing its laws and policies to ensure better alignment with the UNCRPD, as well as more intentionality in grounding law and policies in the UNCRPD.

For instance, political office holders (POHs) in Parliament rarely cite the UNCRPD in their speeches when outlining policy and legislation. Additionally, when asked about how the government is or is not meeting standards of the UNCRPD, explanations are usually lacking if not absent.

An example of this was during the second reading of the amendments to the Mental Health Care and Treatment Act (MHCTA) during a Parliament sitting in 2024.

As we noted in our submission to the fourth UPR, in 2024, Parliament passed a law to amend the MHCTA. As we outlined, the MHCTA as first codified in 2008 does not align with Article 14 of the UNCRPD.<sup>xxvi</sup> For example, under Section 7, the MHCTA authorises law enforcement to apprehend someone on the basis of a perceived impairment and who may be in danger to themselves or others. However, as noted by the guidelines on Article 14 by the Committee on the Rights of Persons with Disabilities, this practice is “incompatible with article 14 as interpreted by the jurisprudence of the CRPD committee. It is discriminatory in nature and amounts to arbitrary deprivation of liberty”.<sup>xxvii</sup>

Yet, in 2024, the amendments made to MHCTA placed the law further away from the principles of Article 14 of the UNCRPD. Under the new amendments, perceived danger due to perceived

impairment does not need to be imminent but only “reasonably likely” – with no clear specifications on what constitutes as “reasonably likely”.<sup>xxviii</sup>

Despite this, when asked in Parliament as to how the amendments to the MHCTA aligns with Singapore’s commitments and obligations under the UNCRPD, the government simply replied by stating “we can confirm that the MHCTA continues to be in compliance after the amendments” – but did not provide an explanation of how this is the case.<sup>xxix</sup>

To be clear, the government may have their arguments and reasons for their position. However, this is precisely an example of how processes, protocols, and methods that the government uses to review its laws and policies to better achieve the standards of the UNCRPD need to be significantly clearer, more intentionally articulated, and less opaque.

The reply from the government also illustrates how the discussion of law and policy itself need to be better grounded in UNCRPD principles - especially when such law and policy have significant implications on whether persons with disabilities will receive the needed legislative protections.

#### **(d) Employment (para. 37)**

Para. 37 of the government’s state report pertains to employment. It notes how several key outcomes of employment such as the employment rate and percentage of persons with disabilities working full time have increased in recent years.<sup>xxx</sup> It also notes that the incomes of persons with disabilities working full-time have increased as well.<sup>xxxi</sup>

These are definitely positive gains that should be well-noted as important progress in employment outcomes for the disability community.

However, as we have done for the previous items in this section, it is important to assess such outcomes in light of standards such as that of the UNCRPD.

One of the key principles of the UNCRPD as illustrated above, is the principle of equality, equity, and non-discrimination. While employment rate and increased participation in full-time employment are notable indicators, as we note in our submission to the fourth UPR, other indicators such as under-employment rates and employment retention rates, and how such rates compare and contrast to the general public, should be tracked to better monitor not only employment outcomes but also the presence or absence of equitable employment outcomes.<sup>xxxii</sup>

More importantly, as the UNCRPD emphasises the need to address barriers in society, more data is required to track such barriers over time. For example, according to a 2022 study by the Association of Women for Action and Research (AWARE), persons with disabilities on average experience discrimination 28 percentage points higher than the general public in Singapore.<sup>xxxiii</sup> More of such data is required to better assess if Singapore is making progress on addressing the barriers in society.

Additionally, while we are heartened by the current development of a Tripartite advisory on reasonable accommodations, as we note in our submission to the fourth UPR, an advisory is non-binding and is likely to not deter the denial of reasonable accommodations by errant employers.<sup>xxxiv</sup>

We thank the government for acknowledging in their state report that they “recognise that more can be done to improve employment outcomes for persons with disabilities”, and hope that such points as we outline will assist in achieving an employment landscape in Singapore that is aligned with the standards of the UNCRPD.

**(e) Inclusive education (para. 38 – 40)**

Para. 38 – 40 of the government’s state report focuses on inclusive education. Para. 38 notes the Inclusive Support Programme that aims to foster more frequent interaction between preschoolers with and without disabilities.<sup>xxxv</sup> This is a welcomed move, and it would be important for the government to provide more data and information on how best to scale up such programmes. Currently the Inclusive Support Programme is in only a small number of pre-schools.<sup>xxxvi</sup>

Para. 39 and 40 discuss the current state of education in primary and secondary schools in Singapore. It notes that currently 80% of students with disabilities or special education needs (SEN) are in mainstream schools.<sup>xxxvii</sup> While this is a fair percentage, as we note in our submission to the Fourth UPR, there is the need to not only monitor the percentage of students with SEN in mainstream schools, but also the quality of that integration.<sup>xxxviii</sup>

Firstly, while the state report notes that there are a “good spread of schools across the island with full barrier-free accessibility”, according to our calculations based on most recent publicly available data, a majority of mainstream primary and secondary schools still do not have the full barrier-free access for students who are wheelchair users.<sup>xxxix</sup> This limits educational opportunities and options for such students. There also are a limited number of mainstream schools fully equipped for students with sensory disabilities.<sup>xl</sup>

Additionally, as we have called for in our submission to the fourth UPR, the government should track other indicators other than percentage of students with SEN in mainstream schools.<sup>xli</sup> Current studies by CSOs show the need for significant improvement. Studies such as a 2025 report by EveryChild.SG show inconsistent and in a number of cases distressing experiences parents of SEN students face when navigating the mainstream school system.<sup>xlii</sup>

Recent annual budgets by the government also tend to focus on developing SPED schools – with few specifics or announcements on how mainstream schools will be developed for inclusivity. While SPED schools have their place and purpose, the UNCRPD is fairly clear – especially in its General Comments on Education – that segregated approaches are not synonymous with inclusive education, and that just as much of a focus needs to be on developing inclusivity of mainstream schools.<sup>xliii</sup>

It also is important to address a point in this area of education in the government’s state report. In para. 39, it notes that “We [the government] foster respect and empathy through Character and Citizenship Education [CCE]”.<sup>xliv</sup> As we note in our submission to the fourth UPR, it is at best very unclear how this is being done in a way that fosters an understanding of disability that is aligned with principles of the UNCRPD.<sup>xlv</sup> The government, when answering the question of how CCE teaches disability, even has used outdated terminology and phrasing that is antithetical to the UNCRPD – for instance, describing disability as “personal challenges” to be “overcome”.<sup>xlvi</sup>

Additionally, in our conversations through our advocacy work over the years, it is not uncommon to come across both persons with and without disabilities who will remark that they do not remember anything significant or anything at all being taught about disability concepts throughout their education.

Furthermore, as outlined in (3)(c), there is significant room for improvement for how government reviews and discusses policy and initiatives in the context of the UNCRPD. The CCE curriculum is an example of this.

In 2023, an MP filed a Parliamentary Question (PQ) enquiring as to whether there are plans to amend and enhance the current CCE to be aligned with the UNCRPD.<sup>xlvii</sup> However, in their reply, the government did not answer the question – i.e. the government’s reply does not even cite, summarise, or note any portion of the UNCRPD to explain how the CCE curriculum is or is not aligned with principles of the UNCRPD.<sup>xlviii</sup>

Additionally, the government stated in their reply: “the Enabling Masterplans, is substantively aligned with the social model of disability in the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)”.<sup>xlix</sup>

It is true that EMP2030 aims to address several social barriers in society. However, as we have outlined in our submission to the fourth UPR, within this commentary, and in previous publications, the Enabling Masterplans (EMPs), while containing several notable objectives, does not address a number of important areas of the UNCRPD. In terms of the CCE and the UNCRPD, it is worth noting that EMP2030 does not elaborate or specify of how the government plans to use the CCE curriculum to teach principles of the UNCRPD.

More importantly, the reply from the government shows how the discussion of CCE needs to be better grounded in UNCRPD principles and framing – especially in Parliament where important initiatives and policies are discussed.

In terms of the CCE itself, students with and without disabilities/SEN need to learn about important concepts such as reasonable accommodation, non-discrimination, and example of equitable outcomes – amongst many others. As outlined, it is unclear how the CCE is teaching such important principles.

#### **(f) Inclusive public spaces and transport (para. 41)**

Para. 41 of the government’s state report outlines their assessment of inclusive public spaces and transport in Singapore.

Singapore has definitely witnessed improvements to the accessibility of public transport and several public spaces. Public buses and the mass rapid transit (MRT) system, the Code on Accessibility in the Built Environment by the Building Construction Authority (BCA), along with several neighbourhoods across Singapore, have witnessed significant enhancements over the decades especially for wheelchair users given the government’s push to make amenities more accessible with Singapore’s aging population.

The majority of public spaces meeting basic accessibility standards as cited in the government’s state report is definitely notable.<sup>i</sup> Additionally, it is notable that a majority of persons with disabilities expressed satisfaction with Singapore’s public transport system. Although it is worth noting that the 74.2% cited in the state report is likely from the government’s 2024 Disability Trends report.<sup>ii</sup> If so, it is worth noting that the 74.2% is not of the total persons with disabilities in that study, but out of the number of persons with disabilities who took public transport in the past year.<sup>iii</sup> Adjusting for this, the percentage is closer to approximately 60% of persons with disabilities expressing satisfaction with the public transport system in Singapore.

60% of persons with disabilities citing satisfaction is a fair percentage. However, there are areas in Singapore’s overall transport landscape that can and needs to be further improved to meet the realities of persons with disabilities.

For example, while the MRT has witnessed considerable improvements in accessibility for wheelchair users since its launch in the late 1980s, there is room for improvement especially for persons with disabilities other than wheelchair users. For instance, persons with visual impairments have shared with us that last-mile accessibility is still fairly inconsistent depending on the station, and members of the deaf/hard-of-hearing community have shared with us that screens in MRT stations can be better used to present more comprehensive visual signage.

However, beyond the public transport system, when assessing the inclusivity of Singapore's public spaces and transport, it is important to not only ask for instance, "is Singapore public transport accessible?", but rather it is important to ask the question of "can persons with disabilities navigate Singapore as accessibly and affordably as possible?". This latter question is important because it is arguable that this is the purpose of public spaces and transport.

When this latter question is asked and assessed, one will find that there are further gaps that can and need to be addressed.

For instance, even if Singapore's public transport system, including last-mile access, was fully optimised for accessibility, there are persons with disabilities who occasionally or most of the time, will have no choice but to rely on private transport options – such as Taxi, Grab, or other point-to-point (p2p) private hire vehicle options.

For instance, times of disruption such as during poor weather or construction sites often can make a familiar accessible route inaccessible – leaving persons with disabilities having not much option but to take private transport such as taxis or Grab during such circumstances. Many blind/visually impaired people who can take public transport usually will only be able to do so after learning a new route several times with an orientation and mobility (O&M) specialist. This process often takes time depending on the complexity of the route. If there is thus the need to travel to an unfamiliar location via an unfamiliar route on a time-sensitive basis (which everyone occasionally faces), blind/visually impaired people often have no choice but to also take private transport options such as taxis or Grab. Additionally, there are persons with disabilities who travel with medical equipment and often have no choice but to travel either via accessible taxi or Grab, or via more costly specialised wheelchair transport options.<sup>liii</sup> All of such costs can and often does add up over time.

As we have called for, support structures must take into consideration such realities.<sup>liv</sup> However, currently in Singapore, there are only two financial concession assistance supports that target the cost of private transport options – the Enabling Transport Subsidy (ETS) and the Taxi Subsidy Scheme (TSS) - and both of them have rather rigid eligibility and means-testing requirements. For example, one can only use either support for very limited purposes – not covering purposes of travel such as medical appointments.<sup>lv</sup> They also do not account for such scenarios as above – i.e. one is only eligible for the TSS if one is "Certified as unable to take public transport and totally dependent on taxis for travel".<sup>lvi</sup> This means that disabled people such as blind/visually impaired people who can take public transport in the general sense, but who have no choice but to take taxis or Grab on regular occasion for reasons outlined, will not be eligible for any concessions under the ETS or the TSS.

Such improvements will be important for Singapore to be better aligned with Article 20 of the UNCRPD which emphasises optimising independence of choice and affordability in personal mobility.<sup>lvii</sup>

Pertaining to public spaces, it is true that accessibility of spaces under the government's management have improved over time. This is a significant area of progress that should be well noted.

However, when assessing the state of inclusivity of public spaces, an often-overlooked area are digital spaces run by the private sector but that are open and serving the public.

As we note in our submission to the fourth UPR [and in (3)(a)], currently Singapore, unlike a number of OECD jurisdictions, does not have legislated regulations to ensure basic accessibility of digital platforms (i.e. mobile applications and websites) run by the private sector.<sup>lviii</sup> As a result, it is not uncommon for persons with disabilities to share that accessing commonly-used platforms run by the private sector in Singapore (i.e. banking, food delivery, and e-commerce platforms) is inconsistent and at times even significantly difficult.<sup>lix</sup> This limits (and at times significantly limits) options for persons with disabilities in accessing basic amenities run by such commonly-used platforms in Singapore. This results in unequal and inequitable outcomes for persons with disabilities.

Such digital spaces have an impact not only on daily activity but on navigating Singapore. For instance, whether one can easily access ride-hailing or e-commerce and food delivery mobile applications will impact one's day-to-day activity and navigation.

Such aspects are important to consider when answering the question of whether persons with disabilities in Singapore can navigate the island nation as accessibly and affordably as possible.

#### (g) Retirement Adequacy (para. 42)

Para. 42 of the government's state report outlines recent developments in enhancing retirement adequacy for persons with disabilities in Singapore – namely noting the recent expansion of the Matched Retirement Savings Scheme (MRSS) to include persons with disabilities of all ages.<sup>lx</sup>

This is a definite welcomed expansion that will significantly assist in producing more equitable outcomes for a number of persons with disabilities in Singapore in retirement adequacy.

Under the expansion, persons with disabilities of all ages earning an average monthly income of no more than S\$4,000 qualify for the scheme. However, persons with disabilities typically have higher daily or monthly expenses – likely to spend more on costs for supports, therapy appointments, amongst others. This is commonly and colloquially known amongst advocates around the world as the “disability tax” – which makes it difficult for even those earning a decent wage to save for retirement.

Additionally, in Singapore, the median gross monthly income of full-time employed residents in 2025 stood at S\$5,775.<sup>lxi</sup>

Due to such factors, some advocates in Singapore have thus recommended that while the expansion of the MRSS is a greatly welcomed move, the government should consider eventually allowing persons with disabilities who earn between S\$4,000 and S\$6,000 to qualify for the MRSS, but to receive lower matching amounts compared to those earning a lower monthly income. This will ensure more persons with disabilities are assisted in achieving retirement adequacy, while prioritising and providing more assistance to those who are in greater need.

The MRSS was not the only financial assistance scheme to be enhanced. In 2025, the per capita household income (PCHI) cap for a number of disability-related financial supports schemes were raised significantly to be closer to, or in some cases, exceeding the median Singapore PCHI which stood around S\$4,100 last year.<sup>lxii</sup>

While we acknowledge such important enhancements to the MRSS and other financial assistance measures, such schemes do point to another gap that is important to highlight – which is the disabilities that are not recognised in Singapore's definition of disability.

As we outline in our submission to the fourth UPR, the definition of disability used by the Singapore government currently limits disability to physical, intellectual, sensory disability, and autism – excluding disabilities such as psychosocial disabilities and forms of neurodivergence other than autism.<sup>lxiii</sup> A number of financial supports that cater to persons with disabilities utilises this categorisation of disability – excluding persons with disabilities who may require such assistance.

This is one main reason why we have recommended for the government to update its definition to be more inclusive of the diversity of disabilities. Updating its definition of disability will also be important for Singapore to be more aligned with the UNCRPD – which describes disability to also include “mental” related conditions – hence the need to include psychosocial disabilities under the disability definition.

#### **(4) Other areas of the Singapore government’s state report**

As disability intersects with other issues and themes, it is worth briefly examining several broader issues highlighted in other areas of the government’s state report through a disability lens. Two examples in particular are worth noting especially in light of developments since Singapore’s last UPR in 2021.

##### **(a) Criminal justice**

Section V.C of the government’s state report pertains to criminal justice. It highlights several investments and legal developments since 2021. As briefly highlighted in the beginning of this analysis, implementation of the law is one important aspect – yet another is how well the laws and procedures themselves align with important standards and conventions such as the UNCRPD.

For example, as highlighted in (3)(c), there is a case to be made that the MHCTA – and the powers it provides law enforcement – is unaligned with Article 14 of the UNCRPD. In addition, as we highlighted in our 2022 Parallel Report to the UN Committee on the Rights of Persons with Disabilities, and note in our submission to the fourth UPR, case developments since the last UPR in 2021 does raise pertinent questions about the state of alignment of various aspects of the criminal justice system with UNCRPD principles.

For example, advocates have called for clarity and improvements on whether Singapore is fully adopting the International Principles and Guidelines on Access to Justice for Persons with Disabilities released by the UN Committee on the Rights of Persons with Disabilities, as well as for criminal justice procedures to adopt definitions of disability that is aligned with UNCRPD principles.<sup>lxiv</sup>

We note the recent development by the government of the Inclusive Justice Taskforce – and hope that the taskforce will examine and include such aspects as they develop their recommendations.

##### **(b) Inclusivity of investments in building a resilient Singapore**

Section VI and in particular, VI.A. of the government’s state report outlines their efforts in enhancing employment and skills upgrading opportunities in pursuance of building a more resilient Singapore.

This is arguably one of the larger investments in the last several years since 2021 – with each annual government budget allocating significant funding towards promoting lifelong learning opportunities through SkillsFuture Singapore (SSG) – recently merged into the Skills and Workforce Development Agency (SWDA).

Yet, as we highlighted in our submission to the fourth UPR, there is needed room for improvement on the inclusivity of lifelong learning opportunities.<sup>lxv</sup> For instance, there are no legislated regulations to ensure provision of reasonable accommodations in training development and lifelong learning courses - As a result, persons with disabilities have noted inconsistent if not difficult experiences in participating in such important opportunities.<sup>lxvi</sup>

While there have been important resources and grants developed to encourage reasonable accommodation provision, there have been few specifics on how the government plans to ensure reasonable accommodations other than an encouragement approach. As we note in our submission to the fourth UPR, the establishment of the Enabling Academy – a separate learning hub for persons with disabilities – has its place for those with higher support needs. However, the Enabling Academy is only available to persons with disabilities and contains a small fraction (less than 5% by the most generous of estimates) compared to the total number of courses available in the wider mainstream system.<sup>lxvii</sup> If the goal is equitable outcomes and wider integration according to UNCRPD principles, in the long term, a main focus on the Enabling Academy is likely an unsustainable approach, and one not aligned with the principles of the UNCRPD.<sup>lxviii</sup>

As the government has emphasised repeatedly, we currently live in an uncertain time – with ever-changing global trends. Historically-marginalised groups such as persons with disabilities are usually disproportionately affected during global shocks or transitions. Investments to foster and build a “resilient” nation must thus be inclusive from the get-go – both in design and implementation - to optimise equitable outcomes.

## **(5) A “pragmatic” approach**

Before concluding this analysis, it is important to further discuss a point mentioned in the beginning of the government’s state report pertaining to how the government approaches the topic of rights protections in Singapore.

In the opening of their state report to the fourth UPR, the government notes in paragraph 4 that it takes a “pragmatic” approach to human rights.<sup>lxix</sup> This is not a new sentiment from the government. The government has cited this approach of pragmatism in the previous UPRs, and emphasised this approach again not only in their state report but also in their interactive dialogue of the fourth UPR.

Yet, there are a number of instances pertaining to rights protections in Singapore where it is difficult to understand how the approach used may be practical for most of the parties and especially the more vulnerable members involved.

To illustrate this, we can return to the topic of assuring reasonable accommodations in the workplace – one of the key areas of our advocacy over the last few years.<sup>lxx</sup> As we highlighted in our submission to the fourth UPR [and in (3)(c) and (3)(d)], the WFA – Singapore’s first workplace anti-discrimination law – does not prohibit the denial of reasonable accommodations nor does it address reasonable accommodation provision.

In our conversations over the years, many of the issues faced by persons with disabilities in Singapore pertaining to employment can be traced to the denial of reasonable accommodation and/or the lack of reasonable accommodation policy in Singapore workplaces.<sup>lxxi</sup> This is not surprising given how reasonable accommodations, by definition, are essential for persons with disabilities to participate in the workplace.

Yet, the government has chosen an encouragement approach – where they are providing important guides and grants to encourage employers to provide reasonable accommodations, but unlike a number of OECD jurisdictions, have stopped short at requirement. This comes despite the fact that reasonable accommodations, by definition, pose no undue burden on employers, and despite the fact that there are concrete guidelines from entities such as the UN on how accommodations can be assessed to be reasonable for the provider of the accommodation.<sup>lxxii</sup>

However, an encouragement approach has notable practical limitations.

For instance, the more errant employers who are resistant to change are likely not to be influenced by a mere encouragement approach. Yet, the workplaces where persons with disabilities are experiencing the most difficulty in attaining reasonable accommodations are the same workplaces overseen by the more errant employers who are resistant to change.

These dynamics are similarly present in other settings such as lifelong education [see (4)(b)].

Putting aside concerns on rights protections, if one of the objectives is to target where the problem may be the most prevalent, it is difficult to conceive how a mere encouragement approach is an effective and for that matter a practical one.

Ultimately, pragmatism is a means to an end.

Pragmatism can be a tool to assist in prioritising competing needs and concerns. However, when not clearly defined, it leads to important questions that often remain unanswered such as

- Practical for what purpose?
- Practical for whom?
- Who gets to define what is considered “practical”?
- What costs should a society accept in the name of set pragmatism?

It is understandable if the government wants to take a practical approach to the topic of human rights, but if so, such questions need to be clearly answered in any discussion pertaining to rights protections.

## **(6) Conclusion**

As noted in the beginning of this commentary, regardless of the approach a country’s government takes, the UDHR and other important UN documents are clear that while context matters in terms of implementation, the goal of rights protections is non-negotiable. In the context of disability, having ratified the UNCRPD in 2013, the government should aim to root and discuss the goal of rights protections for persons with disabilities in key principles of the UNCRPD.

This is one of the key factors that needs improvement in the Singapore context as it pertains to rights protections.

Currently, discussions on disability in Singapore – whether in policy circles or in the media, unfortunately rarely mention important principles of the UNCRPD, and public awareness campaigns by a number of community organisations still rely on vague notions of empathy. This often leads to unstructured ways of discussing disability – at times even producing or reinforcing harmful stereotypes and perceptions of disability and disability inclusion that are antithetical to standards of the UNCRPD.

Singapore has made progress in various areas. However, significant gaps remain. As illustrated in this analysis and response, standards such as that found in the UNCRPD serve as an important metric in outlining what we as a nation should aim towards – and as a result, they serve as an important tool in assisting to better identify the gaps, along with clarifying what solutions are needed to address such gaps, barriers, and inequities that persons with disabilities face.

By better and more intentionally grounding discussions around law, policy, and public discourse in the principles and standards of the UNCRPD, Singapore will better solidify and concretise its vision of a fair society. It will better assist in defining what we as a society mean when we say that “Singapore should leave no one behind”. It will better enrich and clarify discussions around terms such as “inclusion”, “equality”, and “equity” – terms that otherwise are vague without proper definition. As a result, it will help in strengthening the coordination of efforts and collaborations – as such efforts are usually stronger when there is a clear and common understanding of shared goals. This is the kind of pragmatic approach to rights protections that we hope to witness in Singapore.

## Endnotes

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- <sup>i</sup> You can read the full Singapore government state report: Singapore National Report, 10 February 2026, <https://docs.un.org/en/A/HRC/WG.6/52/SGP/1>
- <sup>ii</sup> To read our full submission: Disabled People’s Association (DPA) Singapore, October 2025, “Submission to the Fourth Universal Periodic Review (UPR) of Singapore”, DPA.org.sg, <https://dpa.org.sg/wp-content/uploads/2026/05/DPA-Submission-for-Fourth-UPR-of-Singapore.pdf>
- <sup>iii</sup> Singapore National Report, para. 2
- <sup>iv</sup> Ibid, endnote 1
- <sup>v</sup> Gallup, 18 September 2025, "What is the Law and Order Index?" Gallup, <https://www.gallup.com/analytics/694904/what-is-law-order-index.aspx>
- <sup>vi</sup> United Nations, "The Universal Declaration of Human Rights" UN.org. <https://www.un.org/en/about-us/universal-declaration-of-human-rights>; For a compilation of recommendations based on UN documents: Working Group on the Universal Periodic Review, May 2026, “Compilation of information prepared by the Office of the United Nations High Commissioner for Human Rights” United Nations. <https://docs.un.org/en/A/HRC/WG.6/52/SGP/2>
- <sup>vii</sup> Singapore National Report, para. 4
- <sup>viii</sup> Singapore National Report, para. 33; To read the full Enabling Masterplan: Ministry of Social and Family Development (MSF), 2022, "Enabling Masterplan 2030" MSF.gov.sg. [https://www.msf.gov.sg/docs/default-source/enabling-masterplan/emp2030-report-\(final2\).pdf?sfvrsn=8032eb4d\\_3](https://www.msf.gov.sg/docs/default-source/enabling-masterplan/emp2030-report-(final2).pdf?sfvrsn=8032eb4d_3)
- <sup>ix</sup> DPA Singapore, October 2025, “Submission to the Fourth Universal Periodic Review (UPR) of Singapore”, para. 13 – 14; United Nations, "Article 27 - Work and Employment" <https://social.desa.un.org/issues/disability/crpd/article-27-work-and-employment>
- <sup>x</sup> DPA Singapore, October 2025, “Submission to the Fourth Universal Periodic Review (UPR) of Singapore”, para. 33 – 34.
- <sup>xi</sup> United Nations, “Article 9 – Accessibility” <https://social.desa.un.org/issues/disability/crpd/article-9-accessibility>
- <sup>xii</sup> Singapore National Report, para. 34
- <sup>xiii</sup> To read the full 2022 Concluding Observations by the UN Committee on the Rights of Persons with Disabilities: United Nations Committee on the Rights of Persons with Disabilities, 9 September 2022, "Concluding observations on the initial report of Singapore," United Nations. [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fSGP%2fC0%2f1&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fSGP%2fC0%2f1&Lang=en)
- <sup>xiv</sup> Singapore National Report, para. 35
- <sup>xv</sup> United Nations, “Article 25 – Health” <https://social.desa.un.org/issues/disability/crpd/article-25-health>
- <sup>xvi</sup> World Intellectual Property Organisation, "Treaties Collection" <https://www.wipo.int/wipolex/en/treaties/parties/remarks/SG/258?>
- <sup>xvii</sup> Monetary Authority of Singapore (MAS), 30 May 2024, "Guidelines on Fair Dealing - Board and Senior Management Responsibilities for Delivering Fair Dealing Outcomes to Customers" MAS.gov.sg. <https://www.mas.gov.sg/regulation/guidelines/guidelines-on-fair-dealing---board-and-senior-management-responsibilities-for-delivering-fair-dealing-outcomes-to-customers>
- <sup>xviii</sup> CNA, 26 February 2026, "Committee of Supply 2026 debate, Day 1: Rachel Ong on insurance for persons with disabilities" CNA.com <https://www.channelnewsasia.com/watch/committee-supply-2026-debate-day-1-rachel-ong-insurance-persons-disabilities-5955201>
- <sup>xix</sup> For an example, refer to: Daryl W.J. Yang, "Disability Discrimination in the Provision of Health Insurance: Article 25(e) of the UN Convention on the Rights of Persons with Disabilities" International Journal of Discrimination and the Law 24, nos. 1–2 (2024): 48–66).
- <sup>xx</sup> Singapore National Report, para. 36.
- <sup>xxi</sup> DPA Singapore, October 2025, “Submission to the Fourth Universal Periodic Review (UPR) of Singapore”, para. 8 - 12.
- <sup>xxii</sup> Ibid.
- <sup>xxiii</sup> To read the full UN CRPD General Comments on Employment: 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>; To read the full UN CRPD General Comments on Equality and Non-discrimination:

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>

<sup>xxiv</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 8 - 12.

<sup>xxv</sup> Singapore National Report, para. 36.

<sup>xxvi</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 38 - 39.

<sup>xxvii</sup> Ibid; United Nations Committee on the Rights of Persons with Disabilities, "Guidelines on Article 14 of the Convention on the Rights of Persons with Disabilities" (United Nations, September 2015).

<sup>xxviii</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 38 - 39.

<sup>xxix</sup> Ministry of Home Affairs (MHA), 2 April 2024, "Second Reading of the Law Enforcement and Other Matters Bill – Wrap-Up Speech by Mrs Josephine Teo, Minister for Communications and Information & Second Minister for Home Affairs" MHA.gov.sg. <https://www.mha.gov.sg/media-room/newsroom/second-reading-of-the-law-enforcement-and-other-matters-bill-wrap-up-speech-by-mrs-josephine-teo-minister-for-communications-and-information-second-minister-for-home-affairs/>

<sup>xxx</sup> Singapore National Report, para. 37.

<sup>xxxi</sup> Ibid.

<sup>xxxii</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 13 - 14.

<sup>xxxiii</sup> Association of Women for Action and Research (AWARE), 20 September 2022, "1 in 2 experienced workplace discrimination in Singapore over the past five years," AWARE. <https://www.aware.org.sg/2022/09/1-in-2-experienced-workplace-discrimination-aware-milieu-survey/>

<sup>xxxiv</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 10.

<sup>xxxv</sup> Singapore National Report, para. 38.

<sup>xxxvi</sup> Early Childhood Development Agency (ECDA), 21 April 2026, "Inclusive Support Programme (INSP)" ECDA.gov.sg. [https://www.ecda.gov.sg/parents/other-services/early-intervention-services/inclusive-support-programme-\(insp\)](https://www.ecda.gov.sg/parents/other-services/early-intervention-services/inclusive-support-programme-(insp))

<sup>xxxvii</sup> Singapore National Report, para. 39 – 40.

<sup>xxxviii</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 26 – 30, 32.

<sup>xxxix</sup> Disabled People's Association (DPA) Singapore, July 2022, "DPA 2022 Parallel Report," DPA.org.sg. <https://dpa.org.sg/wp-content/uploads/2022/11/DPA-2022-Parallel-Report.pdf>

<sup>xl</sup> Ibid.

<sup>xli</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 30, 32.

<sup>xlii</sup> Every Child SG, 20 November 2025, "Mind the Gap: Navigating SEN Diagnosis and Support" EveryChild.SG. [https://everychild.sg/wp-content/uploads/2025/11/Mind-the-Gap\\_-\\_SEN-Support-in-Singapores-Mainstream-Primary-Education.pdf](https://everychild.sg/wp-content/uploads/2025/11/Mind-the-Gap_-_SEN-Support-in-Singapores-Mainstream-Primary-Education.pdf)

<sup>xliii</sup> United Nations Committee on the Rights of Persons with Disabilities, 25 November 2016, "General comment No. 4 on Article 24 - the right to inclusive education" United Nations. <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-4-article-24-right-inclusive>

<sup>xliv</sup> Singapore National Report, para. 39.

<sup>xliv</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 31 - 32.

<sup>xlvi</sup> Ministry of Education (MOE), 11 February 2022, "Strengthening Disability Awareness and Understanding Requires Whole-Of-Society Approach" MOE.gov.sg. <https://www.moe.gov.sg/news/forum-letter-replies/20220211-strengthening-disability-awareness-and-understanding-requires-whole-of-society-approach>

<sup>xlvii</sup> Ministry of Education (MOE), 8 May 2023, "Social Disability Model and CCE Curriculum" MOE.gov.sg. <https://www.moe.gov.sg/news/parliamentary-replies/20230509-social-disability-model-and-cce-curriculum>

<sup>xlviii</sup> Ibid.

<sup>xlix</sup> Ibid.

<sup>l</sup> Singapore National Report, para. 41.

<sup>li</sup> Ministry of Social and Family Development (MSF), December 2024, "Disability Trends Report" MSF.gov.sg. [https://www.msf.gov.sg/docs/default-source/research-data/disability-trends-report-2024.pdf?sfvrsn=46eace93\\_2](https://www.msf.gov.sg/docs/default-source/research-data/disability-trends-report-2024.pdf?sfvrsn=46eace93_2)

<sup>lii</sup> Ibid.

<sup>liii</sup> Shalom Lim, 14 February 2025, "Empowering Mobility: The Role of Wheelchair Transport in Singapore" <https://medium.com/@shalom.lim/empowering-mobility-the-role-of-wheelchair-transport-in-singapore-d57ca0bd9199>

<sup>liv</sup> Disabled People's Association (DPA) Singapore, 24 March 2025, "Commentary on Budget and COS 2025" [DPA.org.sg](https://dpa.org.sg). <https://dpa.org.sg/commentary-on-budget-and-cos-2025/>

<sup>lv</sup> Ibid; SupportGoWhere, May 2026, "Taxi Subsidy Scheme" Accessed May 2026.

<https://supportgowhere.life.gov.sg/schemes/TSS/taxi-subsidy-scheme-tss>; SupportGoWhere, May 2026, "Enabling Transport Subsidy (ETS)" Accessed May 2026.

<https://supportgowhere.life.gov.sg/schemes/ETS/enabling-transport-subsidy-ets>

<sup>lvi</sup> Ibid.

<sup>lvii</sup> United Nations, "Article 20 – Personal Mobility" <https://social.desa.un.org/issues/disability/crpd/article-20-personal-mobility>

<sup>lviii</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 33 - 34.

<sup>lix</sup> Ibid.

<sup>lx</sup> Singapore National Report, para.42.

<sup>lxi</sup> Ministry of Manpower (MOM), 2026, "Summary Table - Income" [MOM.gov.sg](https://stats.mom.gov.sg/Pages/Income-Summary-Table.aspx).

<https://stats.mom.gov.sg/Pages/Income-Summary-Table.aspx>

<sup>lxii</sup> DPA Singapore, 24 March 2025, "Commentary on Budget and COS 2025"; Ang Hwee Min, 9 February 2026, CNA.com. <https://www.channelnewsasia.com/singapore/singapore-median-monthly-household-income-inflation-gini-coefficient-5917096>

<sup>lxiii</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 1 - 8.

<sup>lxiv</sup> For more, refer to our 2022 Parallel Report under the section pertaining to the case of Mr. Nagaenthran Dharmalingam: Disabled People's Association (DPA) Singapore, July 2022, "DPA 2022 Parallel Report," [DPA.org.sg](https://dpa.org.sg). <https://dpa.org.sg/wp-content/uploads/2022/11/DPA-2022-Parallel-Report.pdf>

<sup>lxv</sup> DPA Singapore, October 2025, "Submission to the Fourth Universal Periodic Review (UPR) of Singapore", para. 15 - 25.

<sup>lxvi</sup> Ibid.

<sup>lxvii</sup> Ibid.

<sup>lxviii</sup> Ibid.

<sup>lxix</sup> Singapore National Report, para. 4.

<sup>lxx</sup> For more on our advocacy and recommendations on reasonable accommodations in the workplace, refer to Section 1.1.1 of our 2024 report: 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). <https://dpa.org.sg/wp-content/uploads/2024/04/Achieving-Fairness-in-Employment-for-Persons-with-Disabilities-in-Singapore.pdf>

<sup>lxxi</sup> Ibid.

<sup>lxxii</sup> According to guidelines by the United Nations, there are practical ways to decipher if an accommodation requested is reasonable – such as taking into consideration presence or absence of grants and technical assistance to cover financial and implementation costs. Accommodation requests that exceed such costs are arguably not reasonable. Reasonable accommodations thus by definition pose no undue burden to the provider of the accommodation. For more: Ibid.