



ADD International Cambodia and CARE International Cambodia

Summary Report
Rapid Assessment on Inclusion Environment of
Persons with Disabilities in Selected Garment
Factories in Cambodia
March-May 2022

Prepared by Carol Strickler and Pou Sovann, Consultant Team
Phnom Penh, Cambodia
May 2022

This rapid assessment was commissioned by ADD International Cambodia and CARE International in Cambodia for the GIZ funded Strengthening the Economic Resilience of Garment Workers with disabilities during COVID19 and beyond project in Cambodia (1 December 2021-30 May 2022)

1. Introduction

According to The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), persons 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 in society on an equal basis with others.¹ The 2009 Cambodian Law on the Protection and Promotion of the Rights of Persons with Disabilities aims to protect the rights and freedoms of persons with disabilities, however inadequate implementation and lack of understanding of disability inclusion continues to hinder progress towards ensuring that persons with disabilities enjoy their full and equal rights in Cambodian society.

Persons with disabilities are among the most vulnerable in Cambodia and have been particularly disadvantaged by the socioeconomic impact of COVID-19 and the response to the pandemic. As part of the GIZ funded project “Strengthening the Economic Resilience of Garment Workers with disabilities during COVID-19 and beyond”, implemented by CARE International in Cambodia in partnership with ADD International Cambodia, a rapid assessment was conducted from March to May 2022. The purpose of the assessment was to assess garment factories’ current practice related to Gender Equality, Disability and Social Inclusion and to identify supportive aspects as well as access and inclusion issues related to employment situation of garment factory workers with disabilities.

The assessment focused on five key areas: a) Barrier free environment in the factory, b) Reasonable workplace adjustments, c) Recruitment of and return to work possibilities d) Due consideration of persons with disabilities in factory guidelines and e) Introduce a peer group for employees with disabilities.

The assessment used participatory multi-stakeholder rights-based approaches to gather qualitative information from 30 different stakeholders, including 16 garment workers with disabilities, 5 garment factory human resource managers as well as 9 representatives from government institutions, NGOs/CSOs, UN agencies and the private sector, supplemented by a literature review and dissemination workshop.

This rapid assessment is not intended to represent the views of all garment factories or garment workers with disabilities in Cambodia. The information collected is limited to a small sample of participating garment factories and currently employed garment factory workers with disabilities.

2. Key Findings

Only one of the five participating garment factories met the government criteria of employing at least one percent of workers with disabilities for businesses with over 100 employees. About two-thirds of the workers with disabilities interviewed self-identified as having at least some difficulty walking or climbing stairs (69 percent) or some difficulty in remembering or concentrating (63 percent), with half of the workers with disabilities indicating they had some difficulty in two or more functioning areas.

¹ UNCRPD 2006

Table 1: Type of Impairment (WG-SS)

Vision	Hearing	Mobility	Cognition	Self-care	Communication
44% (7)	19% (3)	69% (11)	63% (10)	6% (1)	25% (4)

2.1 Due consideration of workers with disabilities in factory guidelines

2.1.1 Disability Inclusion Policy and Non-discrimination

None of the five garment factories had official separate written disability inclusion policies for the workplace though three factory human resource managers indicated they had statements that addressed the inclusion of workers with disabilities at the workplace.

“I do not know if the company has a policy as they have never mentioned, explained or shared the policy with us.” (Interviews with female garment workers with disabilities, ages 32, 41, Factory C, D)

Almost all (over 90 percent) the workers with disabilities interviewed felt that they were treated fairly and equally by factory management, staff and co-workers just as other workers without disabilities. This includes equal pay for work of equal value, same benefits and entitlements, equal access to grievance processes, leisure and team building activities as well as career development opportunities.

“The company cares for us and helps the workers all the time. They will first check to see if we are fit for a certain position, and if not they will find another more suitable position for us.” (Interview with female garment worker with disability, age 32, Factory D)

2.2 Recruitment and Return to Work Possibilities

2.2.1 Recruitment and Orientation

The vast majority of both factory human resource managers and workers with disabilities agreed their company takes measures and ensures a fair process when recruiting candidates with disabilities. However only 40 percent of the workers with disabilities felt they were given the opportunity to communicate any specific needs during the recruitment process. Furthermore, less than half of the factory human resource managers and workers with disabilities said that disability inclusion awareness sessions were provided to employees and management.

Table 2: Recruitment

Statement: The Company/Factory ...	GF HR	GFW
1. Takes measures to recruit qualified persons with disabilities	80%	69%
2. Ensures a fair process when recruiting persons with disabilities	60%	77%
3. Provides opportunity to communicate specific needs during recruitment process	60%	40%
4. Provides disability inclusion awareness training/sessions to employees	40%	50%
5. Provides disability inclusion awareness training/sessions to management	40%	40%

“I was never given a proper orientation on disability rights. But I have learned that new employees have received an orientation on disability inclusion.” (Interviews with female garment workers with disability, ages 28,32,41, Factory A,C,E)

2.2.1 Return to Work Opportunities

The vast majority of workers with disabilities and all factory human resource managers agreed that the factory either makes an intervention or refers employees to appropriate services should they acquire a disability so they can return to work and provides opportunities to retrain or obtain experience in a different job.

“If employees have an accident or need health care treatment, the company allows us to take six months off from work, and they also reserve our position when we return to work.” (Interview with female garment worker with disability, age 36-45, Factory C)

However, only half of the workers with disabilities felt their company consults on adjustments needed so they can return to work and less than one-quarter said their company allows for a gradual return to duties if they acquired a disability. In contrast, four out of five factory human resource managers stated they both consulted with employees and allowed for a gradual return to work as needed.

Table 3: Return to work

Statement: The Company/Factory ...	GF HR	GFW
1. Makes an intervention or refers employees to appropriate services should they acquire a disability so they can return to work	100%	85%
2. Provides opportunities to retrain or obtain experience in a different job if cannot return to same job	100%	77%
3. Consults and supports with employees with disability on any adjustments needed so they can return to work	80%	54%
4. Allows for a gradual return to duties if they acquired a disability	80%	23%

2.3 Reasonable Workplace Adjustments

Most workers with disabilities said they did not ask for or did not require any special adjustments at their workplace to perform their tasks. While the majority (4 of 5) of factory human resource managers felt their company took measures or consulted on adjustments needed for employees with disabilities, only workers with disabilities from one factory (30 percent) agreed.

“While I do not have any special needs, I know that the factory assigned appropriate tasks such as handling clothes to workers with arm impairments.” (Interview with female garment worker with disability, age 28, Factory A)

The vast majority of workers with disabilities said they were assigned a supervisor, but only half of workers with disabilities said the factory made adaptations to tools and equipment, reviewed job tasks or adapted

job performance requirements. Just over one-third of workers with disabilities said the factory adjusted work schedules as necessary. The responses by the factory human resource managers varied significantly across the different factories and types of adaptations, with only one human resource manager indicating their factory made all necessary reasonable accommodations for employees with disabilities.

“I do not honestly know much about requirements for persons with disabilities, but I do know that what we have provided is not disability inclusive.” (KII with Factory HR managers, Factory A,C,E)

Table 4: Reasonable workplace adjustments

Statement: The Company/Factory ...	GF HR	GFW
1. Took measures or consulted with workers with disabilities on any adjustments needed at the workplace	80%	30%
2. Makes adaptations to workstations	20%	70%
3. Makes adaptations to tools and equipment	40%	50%
4. Assigns a supervisor or job coach if necessary	60%	70%
5. Reviews job descriptions as necessary	60%	50%
6. Makes adaptations to job performance requirements as necessary	40%	50%
7. Makes adaptations to work schedules as necessary	40%	30%
8. Provides transportation as necessary	0%	30%

For accessible infrastructure, only two factory human resource managers stated that their factory was equipped with some doors, ramps or pathways as well as toilets and washrooms accessible to persons with disabilities. No factory had safety precautions or emergency plans for assisting persons with disabilities. For information and communication, all garment factory human resource managers interviewed acknowledged that they did not have documents available in alternative formats that were accessible to persons with different types of disabilities.

Table 5: Accessibility

Statement: The Company/Factory ...	GF HR	GFW
1. Has some doors, ramps or pathways accessible to persons with disabilities	40%	66%
2. Has some toilets and washrooms accessible for persons with disabilities	40%	40%
3. Has sounds (bells, alarms, etc.) complimented with alternative devices for people with hearing impairments	0%	92%
4. Has emergency plans fit for safely evacuating persons with disabilities	0%	92%

“We know we need to invest in infrastructure improvements to comply with the regulations, but the company needs more time and money to achieve this.” (KII with Factory HR manager, Factory D)

The majority of other key stakeholders interviewed also stated that most garment factory sites did not comply with physical accessibility standards for persons with disabilities and companies would need to invest in improvements to conform with the government technical standards. With limited enforcement and penalties, there has been little incentive for companies to spend the additional resources.

2.4 Barriers to disability inclusive environment

The vast majority of workers with disabilities said they did not have any significant challenges in their work at the garment factory however other stakeholders including factory managers, government officials, NGO/CSO staff and private sector representatives did raise several obstacles faced by persons and workers with disabilities. The main challenges raised by stakeholders include but are not limited to:

- 1) **Inaccessible infrastructure** and physical environment for workers with disabilities at the factories,
- 2) **Travel, transportation and road safety issues,**
- 3) **Lack of in-depth understanding of disability inclusion rights** among factory staff, communities, and society at large

“Companies know they will face a lot of challenges to comply with the government regulations, so if the law is not enforced and regulations are not mandatory, there tends to be little compliance.” (KII with stakeholder)

- 4) **No clear system to identify or recruit persons with disabilities** to work in the garment industry
- 5) **The limited or mismatched skills sets** and few applicants of persons with disabilities interested to work in garment factories

“We have a lot of difficulties in finding and recruiting persons with disabilities with skills to work in our factory and need assistance from the government and NGOs to help us.” (KII with Factory HR managers, Factory A, B, E)

- 6) **The low self-confidence** of some persons with disabilities, as well as the
- 7) **Lack of collective voice of workers with disabilities** is viewed as contributing to a lack of empowerment among some persons with disabilities.

“It is important for persons with disabilities to build confidence in themselves and we must all support them. We need to see their abilities not just their disabilities.” (KII with stakeholder)

2.5 Peer Group of Workers with Disabilities

While all workers with disabilities agreed they had the right to join a trade union, only 60 percent were members. Most felt their interests and needs were adequately represented by the trade union, but at least one worker had some reservations about having her concerns addressed. Almost all workers with disabilities said they would be interested to join a special peer group of workers with disabilities.

“Maybe because I have a disability and am different from others, the trade union representatives do not always listen my concerns.” (Interview with female garment worker with disability, age 36-45, Factory C)

3. Conclusions

The vast majority of garment factory human resource managers and garment workers with disabilities interviewed felt workers with disabilities were treated equal as others and there was little discrimination at the workplace. All garment factory human resource managers interviewed have increased their understanding of disability rights and welcome formal disability inclusion policies, awareness-raising activities and systems to increase the number of workers with disabilities and provide reasonable accommodation. However all need additional support from factory management and owners, GMAC, NGOs and the government to ensure disability inclusion policies are implemented and they are complying with the government laws and regulations. Monitoring and enforcement of government laws and regulations was cited as important to ensure compliance.

Many key stakeholders interviewed observed that factories were not fully complying with non-discrimination standards or government regulations. The lack of written disability inclusion policies is contributing to inconsistent workplace regulations and different perceptions by factory staff and workers with disabilities of implementing work regulations and reasonable accommodations to enable workers to perform their tasks. Furthermore, most factories lack accessible infrastructure as well as an effective outreach system to identify and recruit skilled and unskilled persons with disabilities for the workforce. Finally, the collective voice of garment workers with disabilities to raise issues is missing, which can lead to feelings of isolation and disempowerment.

4. Recommendations

The following are a set of suggestions raised by stakeholders interviewed and as a result of the assessment findings on disability inclusive environment in garment factories, for consideration:

Garment Factories

1. With NGO and/or government support, assist garment factories to develop comprehensive disability inclusion policies, that are in line with local laws and international standards, encompassing concepts of non-discrimination, equal opportunity and treatment, right to reasonable accommodation and adjustments, etc. and ensure they are disseminated to all employees. The sample template provided by CARE International in Cambodia is an excellent start.
2. Garment factories should develop a simple action plan or strategy to implement the disability inclusion policy, including involving workers with disabilities in the formulation of the action plan and establishing a committee to oversee implementation and monitoring.
3. Garment factories, in collaboration with NGOs and government, should provide regular training on disability inclusion to all employees and workers, especially factory management and supervisors, and collaborate with NGOs on raising awareness on disability inclusion concepts to all employees.

4. Ensure that concepts of reasonable accommodation and workplace adjustments are put into action and are included as part of the garment factory recruitment and orientation processes. A simple questionnaire or checklist would ensure the appropriate questions are asked by factory staff of candidates and new workers with disabilities, so the burden for requesting or raising specific considerations is shifted from the worker to the factory staff as part of their job.
5. Garment factories, with support from NGOs, should utilize the UNDP and CDPO publication “Employing persons with disabilities in Cambodia: How to Create an Inclusive Workplace Culture, Practical Tips for Employers 2019, especially the Chapter II: How to recruit persons with disabilities, with the seven step approach and Chapter III: How to include persons with disability in the workplace, with suggestions on addressing common barriers.
6. Garment factories need to invest in infrastructure that is accessible to persons with disabilities, especially toilets/washrooms and ramps/pathways, and ensure safety and emergency regulations take into account the needs of persons with disabilities, in line with government standard regulations.

Government and Garment Factories

7. The relevant government institutions, including DAC and DRA/MoSVY, in collaboration with GMAC, should provide regular training and/or information sessions to garment factories and worker representatives on the government’s Technical Standards on Physical Accessibility Infrastructure for Persons with Disability (2018), as well as other relevant guidelines and standards, to insure infrastructure is accessible to persons with disabilities. The government should then monitor and publicize compliance or lack thereof.
8. In collaboration with NGOs, MoLVT and the National Employment Agency, GMAC and garment factories should consider conducting outreach and establishing links with networks of persons with disabilities for recruitment and hiring purposes. CDPO has a network of 75 organisations and 11 forums of persons with disabilities throughout the country and could facilitate outreach to persons with disabilities.
9. Invest in job and skills training for persons with disabilities that match the labour market of the garment industry, including establishing links with skills training centers and/or on the job skills training at garment factories for persons with disabilities.
10. As transportation and road safety are key aspects to safe, accessible employment at garment factories, the government should continue projects to increase safe transportation for garment factory workers and focus on road safety prevention as part of public health programs, employment conditions at factories and disability inclusion programs.
11. GMAC, in coordination with DAC and/or DRA of MoSVY, should continue to facilitate and organize workshops / awareness raising for their members on disability rights and disability inclusion at factories. This could include a targeted campaign on Awareness of Disability Inclusion and Disability Rights, with a “CAN DO” approach, combined with information on compliance with the law.

12. Consider utilizing the garment sector tripartite mechanism involving government representatives, employer representatives and worker representatives, with technical support from ILO and Better Factory Cambodia, to further promote awareness of disability inclusion and government regulations in the garment industry to reach more garment factories and buyers/companies. The tripartite mechanism and involvement of Better Factory Cambodia is a very good model.

CARE, ADD and NGOs

13. Further explore the possibility with factory human resource managers, workers with disabilities and trade unions in each factory of establishing an informal peer group of workers with disabilities to ensure their collective voice is represented to the factory management and by the trade union. CDPO is a valuable resource and could be approached to provide technical support and guidance. Time availability and interest by the workers with disability are critical to success.
14. CARE and ADD should use their platform as international NGOs to lobby international and local buyers and brands to influence garment factories owners and management on awareness and compliance with labour standards on disability rights and disability inclusion. It was noted that some international companies/buyers already have disability inclusion policies and are actively working with local garment factories on implementation and compliance with local and international laws.
15. CARE and ADD, in collaboration with DAC, DRA/MoSVY and GMAC, should consider developing a follow-up action plan and/or project based on the assessment findings to promote disability inclusion and disability rights in garment factories, including dissemination to a wider range of brands/companies involved in the garment industry in Cambodia.

ALL

16. To combat stigma and discrimination towards persons with disability in society, demystify the concept of disability at the community and family level, by demonstrating how workers with disabilities can and do contribute to families and communities, and do not only rely on social assistance.