

**From:** Marina Clarke  
**Sent:** Sunday, 26 November 2017 7:48 PM  
**To:** Nditsheni Hangwani;  
**Subject:** Draft Code for Persons with Disabilities 2017

Dear Nditsheni

Herewith the input of Epilepsy South Africa as requested in terms of notice 902 of 2017 published in Government Gazette No 41265 on 20 November 2017.

Definition of "disability": The definition of the term "disability" should be changed to reflect the definition contained in the White Paper on the Rights of Persons with Disability (WPRPD): *The UNCRPD does not attempt to define disability per se, but rather recognises disability as an evolving concept. Disability is imposed by society when a person with a physical, psychosocial, intellectual, neurological and/or sensory impairment is denied access to full participation in all aspects of life, and when society fails to uphold the rights and specific needs of individuals with impairments. Persons with disabilities experience three main types of interrelated barriers:*

- *Social (including high cost, lack of disability awareness, and communication difficulties);*
- *Psychological (such as fear for personal safety); and*
- *Structural (including infrastructures, operations and information).*

Basic standards for broadcasting service licensees

The current regulations focus exclusively on sensory disabilities (visual and hearing impairments). We would propose the addition of a requirement for licensees to include a warning of flashing lights for persons with photosensitive epilepsy.

Promotion of awareness and compliance

We request that collaboration with the disability sector should be compulsory and not optional - see 7(2).

Thank you for the opportunity to provide input.

Regards

**Marina Clarke**  
National Director



**National Office**