



दिल्ली बाल अधिकार संरक्षण आयोग

दिल्ली सरकार

DELHI COMMISSION FOR PROTECTION OF CHILD RIGHTS
GOVT. OF NCT OF DELHI

ANURAG KUNDU
CHAIRPERSON

D.O. No. F8/DCPCR/21-22/H&N/ PF-III/12365

Dated: 30th June 2023

Dear Sir

As you know, the Delhi Commission For Protection of Child Rights (DCPCR) has been constituted to monitor, and review the implementation of the rights and policies related to the children. I am sure you will appreciate the children with special needs constitute a vulnerable class requiring our greater attention, and support.

Pursuant to our statutory responsibility, I am writing to express the Commission's serious concern regarding the recent decision of the Statistics Division of Department of Health and Family Welfare in the Ministry. to drop disability-related questions from the National Family Health Survey-6 (henceforth called "NFHS-6") conducted by International Institute for Population Sciences (IIPS), Mumbai.

Upon reviewing the NFHS-6 questionnaire¹ recently published on the National Family Health Survey Website, the Commission observed a significant omission of the disability related questions which were earlier part of NFHS-5.

Therefore, the Commission feels compelled to highlight the potential implications of this omission. People with disabilities in India experience an average loss of 10-17 years in life expectancy and closing this gap for this vulnerable population requires access to comprehensive health data such as that on access to education, water and health services.

Such comprehensive data is currently not captured by existing surveys led by the Ministry of Statistics and Programme Implementation (India - Survey of Persons with Disabilities NSS 76th Round : July 2018 - December 2018) and the Ministry of Home Affairs (Census of India by Office of the Registrar General and Census Commissioner of India), which primarily focus on estimating the extent of disability in India. Inclusion of disability questions² in the NFHS-5 marked a progressive landmark in

¹http://rchiips.org/NFHS/NFHS6/Questionnaire/NFHS6_Household.pdf, accessed on 28 June 2023

²<http://rchiips.org/NFHS/NFHS5/schedules/NFHS-5Household.pdf> (Page7), accessed on 28 June 2023

India's commitment to empowerment of people experiencing disability, not only because it helped estimate the extent of disability, but also, and more importantly, because it helped draw interlinkages between disability and access to healthcare services. Specifically, it allowed for disability, like gender or caste, to be treated as a key demographic indicator and for assessing the coverage of key healthcare services for households with a disabled person.

The omission of these questions hampers the ability of state governments, district administrations, and commissions like National/State Commissioner for Disabilities and National/State Commission for Protection of Child Rights (SCPCR) level monitoring bodies such as DCPCR. Their capacity to design, implement, monitor and review the targeted interventions to address the unique challenges faced by individuals with disabilities and their families will now be compromised.

We understand that the key reason for dropping the questions is the concern around capturing inaccurate data on disability or undercounting¹ of disabled population in India. Capturing the full breadth of disabilities is complicated because it may require use of technical medical terminologies that are not easy to comprehend by all. This is an important concern indeed and must be addressed by consulting disability experts and disabled people while the survey is being designed, extensively training and sensitizing surveyors on disability (as in 2011 Census) and at least including all categories of disability that are covered in the Rights of Persons with Disabilities Act, 2016 (as in 2018 NSS).

Considering that NFHS surveys are able to successfully collect data on technical medical topics such as immunizations as well as on sensitive matters such as caste and domestic violence, we believe requisite strategies may be adapted to ensure collection of accurate data on disability as well. An altogether dropping of the questions on disability does not solve the concern on data quality, but further undermines our understanding of challenges faced by people experiencing different forms of disability and their access to key health services.

³ The NFHS-5 questions capture five types of disability--locomotor, visual, hearing, speech, mental--and an 'others' option, a step back from the eight counted in the 2011 census, and much lower than the 21 recognised by the Right Of Persons With Disabilities Act. Persons with intellectual and learning disabilities, and those with chronic neurological conditions and blood disorders, have not been mentioned as a separate category despite their specific needs and vulnerabilities.

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Therefore, we request the Ministry of Health and Family Welfare to reconsider this decision and reinstate disability-related questions in the NFHS-6.

Furthermore, I urge the Ministry to collaborate with relevant stakeholders, including disability rights organizations, experts, and advocates, to ensure the formulation of correct questions for the survey that gathers the existing services, diverse needs and challenges faced by individuals with disabilities.

We are confident that the Ministry of Health and Family Welfare shares our commitment to the welfare of all individuals, including those with disabilities, and will therefore take the cogent decision to restore the disability related questions.

We look forward to hearing from you.

Kind regards

Yours sincerely

Anurag Kundu
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(Anurag Kundu)
Chairperson

Sh. Rajesh Bhushan

Union Secretary (Health)

Govt. of India

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Copy for information to:

1. Chief Commissioner for Persons with Disabilities, Sarojini House, 6, Bhagwan Das Rd, Bhagwan Das Lane, Mandi House, New Delhi-110001
2. Chairperson, International Institute for Population Sciences, Room No.156-A, Nirman Bhawan, New Delhi-110108
3. Hon'ble Minister (Health), Govt. of NCT of Delhi, A-Wing, 7th Level, Delhi Secretariat, New Delhi-110002
4. Hon'ble Minister (Social Welfare), Govt. of NCT of Delhi, 7th Level, Delhi Secretariat, New Delhi-110002
5. State Commissioner for Persons with Disabilities, 25-D, Mata Sundari Road, Near Guru Nanak Eye Center, New Delhi-110002