ABSTRACT
A key innovation of the United Nations (UN) Convention on the Rights of Persons with Disabilities (CRPD) is its recognition of the critical importance of the principle of meaningful participation in realising the rights enshrined in the treaty document. Hence, the CRPD is the first human rights treaty to mandate the participation of civil society in the implementation and monitoring of the treaty. What happens, however, in a non-liberal society where human rights activism is potentially risky and lacks cultural resonance?

This article turns to Singapore as a case study and analyses how one particular cross-disability representative organisation participated in the CRPD monitoring process through the ritualistic mobilisation of disability rights. This mobilisation was enabled by the CRPD’s obligations of conduct, which provide a justification for their participation in the CRPD monitoring process. Hence, the usual risks associated with human rights activism in Singapore can be mitigated because these activists are technically assisting the Singapore government in fulfilling its obligations under the treaty. Such tactics of ritualistic mobilisation are aimed ultimately at the ritualisation of disability rights, which refers to the entrenchment of the human rights model of disability policy as the dominant political paradigm through which to approach disability issues.

In addition to demonstrating the impact of obligations of conduct enshrined in the CRPD on the mobilisation of disability rights, this article adds to the growing recognition in socio-legal and human rights scholarship that civil
society participation and rights mobilisation may take a variety of forms, not only the more explicit or confrontational modes that feature in Western liberal democracies. It also contributes to the growing literature on disability movements in East Asian developmental welfare states by attending to how disability rights and the CRPD are mobilised in the region to realise a more just and equal society for disabled people.

KEYWORDS
disability rights, activism, advocacy, non-liberal regimes, Singapore

Introduction
On 28 October 2021, the Singapore Prison Service issued a letter to the family of Nagaenthran K. Dharmalingam, informing them that Nagaenthran’s execution for the offence of trafficking 42.72 grams of diamorphine was scheduled for 10 November 2021. In response, human rights organisations, including the International Federation for Human Rights, Human Rights Watch, and Amnesty International, lobbied the Singaporean government to grant Nagaenthran clemency on the basis that he was intellectually disabled and the execution of a person with intellectual disability violates international human rights law.1 Though some Singaporean anti-death penalty activists echoed such calls, the disability community was conspicuously silent over Nagaenthran’s execution.

It was only after Nagaenthran had been executed that the Disabled People’s Association (DPA) – the only pan-disability advocacy group in Singapore – addressed his execution in its parallel report submitted for Singapore’s inaugural periodic review before the Committee on the Rights of Persons with Disabilities (CRPD Committee). Notably, the DPA did not address the use of the death penalty on persons with intellectual disabilities. Instead, it simply highlighted that Nagaenthran’s case “raise[d] concerns” with regard to Singapore’s compliance with article 13 of the CRPD regarding whether disabled persons are given sufficient procedural accommodations to ensure equal access to justice.2 Though there was another parallel report submitted by the Movement for the Intellectually Disabled of Singapore

(MINDS), a Social Service Agency (SSA) in Singapore that provides services and support for persons with intellectual disabilities and their families, it made no mention of Nagaenthran or the death penalty.

That disability groups in Singapore have remained silent on the issue of the death penalty – even when it was imposed upon a person with intellectual disability – is unsurprising considering the Singapore government’s stern rebuke of both local and international anti-death penalty advocates over the years, and its aversion to human rights activism in general. In particular, anti-death penalty activists and lawyers representing death row inmates have been investigated and even prosecuted for their activism, including participation in unlawful assembly and contempt of court. This is compounded by the fact that most disability groups in Singapore are service-oriented organisations that receive “state support in the form of benefits, funding, recognition” [but enjoy] “relatively little autonomy to pursue their own agendas”.

Though Singapore ratified the CRPD in 2013, it has not ratified the ICCPR or the International Convention on Economic, Social and Cultural Rights (ICESR). The country has enacted onerous laws that severely restrict the constitutional rights of freedom of speech, assembly and association. This is unsurprising given the People’s Action Party (PAP) government’s continued refusal to abolish arbitrary detention and the death penalty as well as its arsenal of laws that severely restrict the freedoms of speech, association and assembly. The ruling PAP – which has governed Singapore since its independence in 1965 – has historically been averse to human rights which it famously resisted as clashing with “Asian values”, and the

language of human rights lacks cultural resonance in Singaporean society.\(^9\) Specifically, in the context of disability, the individual model of disability remains pervasive in disability policy and attitudes towards disabled people are predominantly informed by the biomedical or charity approach.\(^10\)

Singapore presents a compelling research puzzle with regard to the implementation of the CRPD in non-liberal political environments: what happens to the CRPD's demand for disability participation in a society where first-generation civil-political rights – the freedom of speech, assembly and association – enshrined in the ICCPR are severely restricted? As the CRPD Committee observed, the participation of persons with disabilities in implementing and monitoring the Convention is “possible when such persons can exercise their rights to freedom of expression, peaceful assembly and association as enshrined in articles 19, 21, and 22 of the International Covenant on Civil and Political Rights (ICCPR”).\(^11\) This is unsurprising, considering that the CRPD is part of the “third generation” of human rights that calls attention to the denial of human rights to specific marginalised groups.\(^12\) What this means is that the CRPD does not create or recognise new human rights; instead, it addresses the historical denial of the human rights of disabled people because of their disability.\(^13\)

This article draws on Singapore as a case study to explore the question as to how the obligations of conduct enshrined in the CRPD are implemented in a socio-political environment that is unfriendly or even hostile to civil society activists and human rights defenders. While it is well established that social movements and the mobilisation of human rights necessarily differ in non-liberal contexts,\(^14\) the mobilisation of disability rights after the ratification of the CRPD remains understudied outside the

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Global North. Existing scholarship on these obligations of conduct, and in particular, the role of disabled people and civil society, have centred on their implementation in liberal democracies in Europe and North America.¹⁵

In analysing the publicly available documents in respect of the participation by the DPA, the only local representative organisation, in Singapore’s first periodic review before the CRPD Committee, this article attends to how it employed the ritualistic mobilisation of disability rights in its advocacy to advance its disability inclusion agenda. This is enabled by the CRPD’s obligations of conduct which provide a justification for their participation in the CRPD monitoring process and allow activists to engage with the CRPD. Hence, the common risks associated with human rights activism in Singapore can be mitigated because these activists are technically assisting the Singapore government in fulfilling its obligations under the treaty. Such tactics of ritualistic mobilisation are aimed ultimately at the ritualisation of disability rights, which refers to the entrenchment of the human rights model of disability policy as the dominant political paradigm through which to approach disability issues. This contrasts with more short-term objectives to achieve any immediate legal or policy change through participation in the CRPD monitoring process. The story of disability rights activism in Singapore thus reveals the potentially transformative (and unintentional) impact that such obligations of conduct may have in non-liberal societies, and offers insight into how civil society participation in the monitoring of the CRPD manifests across different contexts.

Theoretically, this article makes three key contributions. First, it adds to the growing recognition in socio-legal and human rights scholarship that civil society participation and rights mobilisation may take on different forms than the more explicit or confrontational modes that feature in Western liberal democracies. Contributing to the growing scholarship on the study of human rights through the

anthropological lens of rituals, this article develops the concept of ritualisation to fill a lacuna in the literature on rights mobilisation to explain why activists in non-liberal political environments might engage with the CRPD, notwithstanding the risk and potential ineffectiveness of human rights activism in their society. Ritualisation offers a novel answer to this question – which has not yet been explored in existing scholarship – as the strategy used by activists as they seek to increase cultural resonance and the political legitimacy of human rights through their formal participation in the monitoring process. Notably, the influence of the CRPD – particularly the obligations of conduct – on rights mobilisation has not yet received sufficient attention.

Second, from a regional perspective, the social, political, and cultural context in this region is particularly germane for exploring the socio-legal question presented in the foregoing paragraph. This paper contributes to the growing literature on disability movements in East Asian developmental welfare states by attending to how disability rights and the CRPD are mobilised in the region to realise a more just and equal society for disabled persons. A point of clarification is perhaps in order here. While Singapore is geographically part of Southeast Asia, it is also often considered an East Asian developmental welfare state by scholars of public policy and social welfare. From this perspective, this article suggests that it may be productive to study Singapore through the lens of East Asian disability studies insofar as the logics


of social policy has “a complex and sometimes-contradictory role in shaping the life conditions of disabled people and in (re)constructing the disability category”. 19 Culturally, Singapore has also been a leading proponent of “Asian values” alongside other Southeast Asian states and Confucian communitarianism alongside other East Asian states to resist the importation of so-called Western values and human rights. 20

Finally, this article contributes to the fledgling field of Singapore Disability Studies, which recently emerged with the publication of an edited volume which aims to “foreground the Singaporean experience in relation to disability [. . . and] bring new disability insights – emerging from the Singaporean context – that might actually have been missing from previous articulations of disability around the world”. 21 Singapore presents valuable insights as it relates to the CRPD, given the historical founding of the international disability rights movement in the country in 1981 and the election of Singaporean Ron Chandran-Dudley, who was blind, as its first chairperson. 22 Yet, despite this convergence between Singapore and the international disability rights movement, Singapore has pursued a different approach to disability policy, focusing on enabling access to inclusion rather than the enforcement of individual rights. 23 While some scholars have attended to the implementation of disability rights, particularly surrounding the CRPD, in Singapore, 24 this article focuses specifically on the CRPD monitoring process. Echoing Zhuang et al., in spotlighting the Singaporean experience with the CRPD, this article hopes to contribute to the broader “global disability discourse that seeks to understand the disability experience in ways that might be helpful to disabled people across the world”. 25

The next section sets the context for disability participation in Singapore with respect to the country’s restricted political space for civil society and weak human

23. Yang and others (n 10).
24. Wong and others (n 10); Meng Ee Wong, Jarn May Low and Paula Applehans, “Understanding CRPD Implementation in Singapore” in Derrick L Cogburn and Tina Kempin Reuter (eds), Making disability rights real in Southeast Asia: implementing the UN Convention on the Rights of Persons with Disabilities in ASEAN (Lexington Books 2017).
25. Zhuang, Meng Ee Wong, and Dan Goodley (n 21) 16.
Disability Participation in Non-Liberal Singapore

In a recent publication on civil society in Southeast Asia, political scientist Garry Rodan noted that Singapore “emphatically debunks any residual myths associated with modernisation theory: it has the most advanced capitalist economy in Southeast Asia and is among the countries with the least political space of civil society.”

By civil society, scholars in Singapore have largely relied on Michael Bernhard’s definition as “a competitive political space, structurally located between official public life and private life, in which a range of voluntary, autonomous organisations have asserted the right to influence public policy”. As Kwok Kian-woon argues, this definition calls attention to the “potential political role of voluntary associations that have a public interest in bringing about social change”.

This “potential political role” of civil society is however significantly restricted in Singapore. First, Singapore has developed a technocratic political culture which “is based on the assumption that there is a single objective solution to all the problems of government [and] rejects the notion that there are competing interests that vie for influence”. Second, Singapore has been ruled by the PAP since it gained independence from the British Empire in 1965. After coming to power, the PAP has sought to “neutralise any competing centre of power” and systematically disabled “and subjugated the power of the unions and student movements to achieve political hegemony”.

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28. Ibid., 6.
“very broad terms, making it easy for the state to step in pre-emptively the moment it feels that its legitimacy or credibility is being challenged by unelected members of civil society”.31

Though the PAP arguably has opened up the space for civil society in recent years, its strategic liberalisation has however only “allow[ed] more space for political activities that would not directly challenge the government [. . . and] was not meant to enhance independent advocacy” which may threaten the legitimacy or reputation of the PAP government.32 This explains why many civil society groups remain “deterred from engaging in advocacy [out of] fear that challenging the status quo may result in a loss of funding or favour, including deregistration as an [institution of public character], charity or society”.33

Specifically, in relation to human rights, a local scholar has suggested that the Singapore state’s relationship with human rights is not a “glad embrace” but a “cautious handshake”.34 In a 1993 speech at the Vienna World Conference on Human Rights, the then Minister for Foreign Affairs articulated Singapore’s “pragmatic approach to human rights” which aims to “balance between the rights of the individual and those of the community to which each individual must belong, and through which individuals must realise their rights”.35 This communitarian ideology is captured in a 1991 White Paper on “Shared Values”, which prioritises the community or national interest over the individual’s rights and distinguishes Asian societies like Singapore from the ostensibly individualistic values of Western societies.36

From an ideological perspective, human rights activism is frowned upon by the Singapore state for being based on such individualist values that are inconsistent with Singapore’s communitarian ideology. Singapore’s reticence towards human rights activism is also illustrated by the fact that the Societies Act 1966 confers automatic registration on voluntary welfare organisations engaged in social welfare and charity, but not groups focused on civil or political rights which are defined to include human rights, environmental rights and animal rights. It is no wonder then that activists generally avoid rights-based methods of advocacy given the lack of cul-

32. Ortmann (n 29) 17S.
33. Corinna Lim, Michelle Ng and Cheng Mun Chang, “Building a Vibrant and Diverse Civil Society – Limitations and Possibilities” in Carol Soon and Gillian Koh (eds), Civil society and the state in Singapore (World Scientific 2017) 175.
34. Thio (n 8) 327.
tural resonance and political legitimacy. Those who do – particularly activists focused on civil-political rights and the abolition of the death penalty – run the risk of potentially being criticised, investigated or even prosecuted for conspiring with foreign (Western) actors to improperly influence domestic politics. Such instances further stigmatise human rights activism as risky or dangerous; notably, there is anecdotal evidence to suggest that some civil society groups have secretly participated in UN human rights monitoring mechanisms to avoid potential state reprisal.

In the context of disability, it is not surprising then that Singapore has not embraced the human rights model of disability policy enshrined in the CRPD; instead, it has adopted what has been described as a “practical approach” to disability policy which is focused on promoting access to inclusion in different spheres of society rather than the realisation of the equal rights of disabled people. This has similarly been attributed to Singapore’s ideology of communitarianism, which demands that individuals put the community above themselves and the nation above all else. At the same time, disability policy in Singapore is animated by the idea of a “many helping hands” approach which contemplates shared responsibility between the government and the people, in particular families of disabled people, in providing social support to and promoting disability inclusion.

Though the CRPD was adopted by the UN General Assembly in December 2007, it did not receive much attention in Singapore until the First Cycle of Singapore’s Universal Periodic Review (UPR) in 2011. In response to calls from other UN Member States to ratify the majority of human rights treaties which Singapore has not acceded to, Singapore declared its intention to ratify the CRPD after clarifying its approach towards the accession of human rights treaties.

Singapore signed and ratified the CRPD on 30 November 2012 and 18 July 2013 respectively, and was the last Southeast Asian country to sign the CRPD. In accordance with its obligations, Singapore was due to submit its initial report within two years from ratification, i.e. by 2015. However, the initial report was received by the CRPD Committee only on 30 June 2016. The inaugural periodic review before the CRPD Committee was scheduled in October 2019 but subsequently postponed to August 2022 due to the emergence of the COVID-19 pandemic.

37. Koh and others (n 9); Chua, Mobilizing Gay Singapore (n 9).
39. Lim, Ng and Chang (n 33) 175.
40. Yang and others (n 10).
42. Zhuang, “At the Margins of Society” (n 22) 1815.
43. Yang and others (n 10) 155.
44. Ibid.
Notwithstanding Singapore’s ratification of the CRPD and the limited legal reforms that the PAP introduced to comply with the CRPD, the human rights model of disability remains peripheral in public discourse and policy-making. Instead, Singapore has charted its own path towards disability inclusion by promoting access to inclusion rather than enshrining enforceable rights in its laws. This departure from a strict adherence to the human rights model of disability is explicitly articulated in Singapore’s initial report to the CRPD Committee, which explained that while Singapore “fully subscribes to the principles enshrined in the Universal Declaration of Human Rights […] the manner in which all rights are attained and implemented must nevertheless take cognisance of specific national circumstances and aspirations”.

The initial report also points to what Singapore describes as a “multi-stakeholder approach” which involves the “collective effort of the public, people and private sectors to build such a society”. Specifically, the Singapore government has been guided by the Enabling Masterplan, a five-year roadmap to chart the development and implementation of programmes and services for persons with disabilities. Notably, the inaugural Enabling Masterplan was published in 2007, shortly after the CRPD was adopted by the UN General Assembly in December 2006. As another indication of Singapore’s departure from the human rights model of disability, there has been no references to the language or concept of disability rights and the CRPD is scarcely mentioned (if at all) in each of the four Enabling Masterplans.

While Singapore has invested significant state resources to empower and support disabled persons across various spheres of life including education, employment, public transport and physical accessibility, Victor Zhuang has observed that there remain limits placed on the lives of disabled people which restrict their autonomy and independence. Similarly, Yang et al have also highlighted that Singapore’s access-to-inclusion approach “circumscribes the transformative potential of the CRPD to engender a paradigmatic shift from the individual model of disability to the social model of disability”. In this context, and as the rest of this paper shows, the role of disability activists to mobilise the CRPD and monitor its implementation becomes all the more important.

The foregoing characteristics of Singapore’s approach to civil society, human rights and disability policy respectively present a double whammy in respect of the ability and desire of disabled people and disability organisations to participate in the implementation and monitoring of the CRPD. On one hand, Singapore’s ratification of the CRPD offers credible moral resources and an institutional avenue for

46. Wong, Low and Applehans (n 25).
47. Yang and others (n 10).
48. Singapore (n 45) para 55.
49. Ibid., 62.
50. Chua, “The Voluntary Sterilisation Act” (n 41) 6.
51. Zhuang, “Inclusion in Singapore” (n 10) 634.
52. Yang and others (n 10) 153.
advocacy. On the other hand, the political culture in Singapore means that rights mobilisation and participation in the treaty monitoring process may be ineffective and get one on the wrong side of the state. The next section examines how these two competing considerations have been balanced by those activists and groups that participated in Singapore’s inaugural review before the CRPD Committee.

**Meaningful Participation in the Implementation and Monitoring of the CRPD**

Increasingly, human rights research has found that while the ratification of a treaty itself does not necessarily lead to any significant changes in domestic law or policy,\(^53\) such change is more likely when there is strong domestic mobilisation by civil society actors.\(^54\) The role of civil society is similarly critical in relation to the effectiveness of monitoring mechanisms, where the decisions of international courts and committees monitoring international treaties have limited effect unless they are seized upon by domestic civil society actors to pressure the government to effect change.\(^55\)

It is against this backdrop that the obligations of conduct enshrined in the CRPD are remarkable. As Meredith Raley observed, the CRPD was drafted “during a time of reform within the UN [. . . and] frankly acknowledged the failures of the past, and attempted to improve the problems surrounding human rights treaties”.\(^56\) One such improvement is by expressly recognising the essential role of civil society, in particular disabled people themselves, in realising the CRPD’s promise of a more inclusive and equal world. This manifested in the participation of civil society, in particular disabled people’s organisations, in the treaty drafting process. Notably, it has been acknowledged that at least 80% of the final text of the CRPD came from the International Disability Caucus that coordinated the participation of the disability organisations in the Convention negotiating

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process.\textsuperscript{57} As the Finnish ambassador to the UN remarked after the CRPD was adopted by the UN General Assembly, “without [civil society’s] valuable input and their intimate knowledge of the life with disabilities, this Convention would not have as much value as it does now”.\textsuperscript{58}

From a disability studies perspective, this innovative aspect of the CRPD is also informed by the international disability movement’s clarion call, “nothing about us without us”, which encapsulates the principle of self-representation.\textsuperscript{59} As James Charlton put it, this principle “forces political-economic and cultural systems to incorporate people with disabilities into the decision-making process and to recognize that the experiential knowledge of these people is pivotal in making decisions that affect their lives”.\textsuperscript{60}

**Enshrining Meaningful Participation in the Text of the CRPD**

The CRPD enshrines the meaningful participation of disabled people in two particular articles of the treaty. On one hand, article 4(3) obliges state parties to “closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organisations” in the implementation of the CRPD. On the other hand, article 33(3) requires state parties to ensure that civil society, in particular persons with disabilities and their representative organisations, are involved and participate fully in monitoring the implementation of the CRPD.

In General Comment No. 7 (2018), the Committee on the Rights of Persons with Disabilities reiterated that “[t]he effective and meaningful participation of persons with disabilities, through their representative organizations, is [. . .] at the heart of the Convention”.\textsuperscript{61} The general comment sought to clarify state obligations under articles 4(3) and 33(3) and their implementation, due to what it observed to be

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\textsuperscript{57} Arlene S. Kanter, *The Development of Disability Rights Under International Law: From Charity to Human Rights* (Routledge 2014) 50. The International Disability Caucus was made up of representatives from non-governmental disability organisations that were invited to attend and participate in meetings of the Ad Hoc Committee on a Comprehensive and Integral International Convention to Promote and Protect the Rights and Dignity of Persons with Disabilities (the Ad Hoc Committee) after it was decided at the first meeting of the Ad Hoc Committee that representatives from non-governmental organisations could do so.


\textsuperscript{60} James I Charlton, *Nothing About Us Without Us: Disability Oppression and Empowerment* (University of California Press 2000) 17.

\textsuperscript{61} Committee on the Rights of Persons with Disabilities (n 11) para 1.
an important gap between the goals and the spirit of articles 4 (3) and 33 (3) and the degree to which they have been implemented [. . .] due, among other things, to the absence of meaningful consultation with and involvement of persons with disabilities, through their representative organizations, in the development and implementation of policies and programme.62

In particular, the CRPD Committee defined the meaning of representative organisations as referring to organisations of persons with disabilities. This is in contrast with organisations for persons with disabilities, which provide services and/or advocate on behalf of persons with disabilities, which, in practice, may result in a conflict of interests in which such organisations prioritise their purpose as private entities over the rights of persons with disabilities.63 Representative organisations are characterised by two defining features: first, they must be led, directed and governed by persons with disabilities and second, a clear majority of their membership should be recruited among persons with disabilities themselves.64

In respect of the state’s obligation to “closely consult with and actively involve” disabled people under article 4(3), the CRPD Committee explained that public authorities should give due consideration and priority to the opinions and views of organisations of persons with disabilities when addressing issues directly related to persons with disabilities.65 In particular, governments should

adopt legal and regulatory frameworks and procedures to ensure the full and equal involvement of persons with disabilities, through their representative organizations [. . . and] adopt provisions granting organizations of persons with disabilities seats on, for example, standing committees and/or temporary task forces by giving them the right to nominate working members to these bodies.66

As for article 33(3), the Committee suggests that governments should “support and fund the strengthening of capacity within civil society, in particular organizations of persons with disabilities, to ensure their effective participation in the processes of the independent monitoring frameworks”.67 The government should also “ensure that organizations of persons with disabilities have easy access to the focal points within government and/or the coordination mechanism [established under article 33(1)]”.68

The Mobilisation of Disability Rights on the Ground

Undoubtedly, from an international law perspective, these new obligations of conduct enshrined in the CRPD are innovative and build on the lessons learnt from earlier human rights treaties. However, from an institutionalist perspective, they

62. Ibid., 8.
63. Ibid., 13.
64. Ibid., 11.
65. Ibid., 23.
66. Ibid., 53.
67. Ibid., 39.
68. Ibid., 41.
appear to have been developed on two core assumptions that may not necessarily hold true across different societies: first, that there exists such a sector known as civil society in each country to play the role envisioned in the CRPD and second, that this sector is willing and able to participate in the implementation and monitoring of the CRPD.

However, as the previous section demonstrates, basic civil-political freedoms may be highly restricted in some countries, whether you are disabled or not, which constrains the ability and appetite of disability activists to participate in the implementation and monitoring of the CRPD. The concept of civil society is also highly fluid, and can refer to formal and informal groupings with varying missions and proximities to the state. For example, in Taiwan, disability rights organisations shifted their focus from advocacy to service provision following the country’s marketisation of social welfare policy. It is also not uncommon for disability organisations in non-liberal societies to be closely affiliated with the state, as is the case in both China and Russia.

Further, the CRPD itself was drafted not to create new human rights as it relates to disabled people but to address the failure of “existing human rights instruments [. . .] in their protection of the human rights and fundamental freedoms guaranteed to persons with disabilities”. Specifically, in relation to the obligations of conduct, it appears to have been taken for granted that the rights to freedom of expression, peaceful assembly and association as enshrined in the ICCPR are already available to the non-disabled person and what the CRPD aims to do only is to ensure that these rights are also made available to the disabled person.

Such socio-political realities across societies complicate the otherwise optimistic structural innovations of the CRPD to realise a more equal and inclusive world for disabled people. In authoritarian environments, activists may employ what Hank Johnston has coined the “repressive repertoire”, which refers to the “less public actions of dissident activists and more risk-averse ordinary citizens” and “ephemeral forms of network organization and oppositional identity that anchor those actors”. Instead of formal tactics such as courtroom litigation and participation in UN monitoring mechanisms, activists may adopt nonformal tactics that are informed by the “importance of recruitment, organizing, and consciousness-raising, which are grassroots activities essential to movement building”. Beyond the degree of formality, these tactics may also vary in the

70. Chang (n 17).
72. Kanter (n 57) 51.
73. Johnston (n 14) 629.
74. Chua, “Legal Mobilization and Authoritarianism” (n 14) 363.
degree of coordination and openness.\textsuperscript{75} The latter is particularly salient as it “contravenes conventional wisdom in socio-legal studies of politics of rights, which typically focus on open forms of mobilisation”.\textsuperscript{76}

Such covert and nonformal modes of rights mobilisation are more likely to feature in non-liberal societies where disabled activists and their representative organisations may not find it safe, useful or effective to engage in such formal strategies. For example, insofar as participation in the CRPD monitoring process involves civil society actors publicly criticising the state for its failings or shortcomings, this may pose a threat to the safety of individual activists and the continued operation of disability organisations (particularly if they rely on state funding). Instead, in contexts where human rights lack cultural resonance or political legitimacy, scholars have observed that activists would focus on “cultivat[ing] rights consciousness and relat[ing] repressive conditions to rights violations to persuade others to join them” through such strategies as vernacularisation and the vernacular mobilisation of human rights.\textsuperscript{77}

The foregoing discussion presents a research puzzle that has emerged in light of the obligations of conduct enshrined in the CRPD: why would and how do activists operating in non-liberal, or even authoritarian contexts formally mobilise disability rights by participating in the CRPD monitoring mechanism? After all, there is no obligation for disability activists or representative organisations to participate in the human rights mechanisms that the government has ratified; this is especially considering the potential risks and futility of such advocacy. To answer these questions, the next section turns to the case of Singapore and develops the concept of ritualisation to explain the DPA’s participation in the country’s inaugural periodic review before the CRPD Committee.

**The Ritualistic Mobilisation of the CRPD in Singapore**

Drawing on socio-legal scholarship on rights mobilisation in non-liberal societies,\textsuperscript{78} this section analyses publicly available documents in relation to Singapore’s inaugural periodic review before the CRPD Committee to theorise the *strategy of ritualisation* in explaining the DPA’s participation in the monitoring process. Informed by religious anthropologist Catherine Bell’s definition of ritualisation as “a way of acting that is designed and orchestrated to distinguish and privilege what is being done in


\textsuperscript{76} ibid.


\textsuperscript{78} See generally, Johnston (n 14); Chua, “Legal Mobilization and Authoritarianism” (n 14); Chua, *The Politics of Rights and Southeast Asia* (n 75).
comparison to other, usually quotidian, activities”, this article argues that ritualisation of disability rights is aimed at entrenching the human rights model of disability policy as the dominant political paradigm through which to approach disability issues, rather than to achieve any immediate legal or policy change through their participation in the CRPD monitoring process.

The strategy of ritualisation is characterised by tactics of ritualistic mobilisation, where activists participate in the CRPD periodic review in an ostensibly dispassionate manner not so much because they want to engender any social or legal change but because their participation is necessitated by the treaty document itself. Notably, in contrast to ritualism’s derogatory associations with ideas of inauthenticity, mindlessness and mechanical compliance, it is precisely these very qualities of ritualism that animate the possibility for activists to mobilise disability rights in hostile or challenging political environments by minimising the potential stigma and risk usually associated with human rights activism.

In theorising ritualisation as a novel form of rights mobilisation, this article contributes to the emergence of human rights scholarship that has analysed human rights through the anthropological lens of religious rituals. However, this article diverges in two ways. First, while the existing literature is concerned with how human rights can be understood as a form of ritual, ritualisation focuses instead on the process by which human rights become a ritual in society. Second, in terms of the object of study, other scholars have largely focused on analysing international human rights documents or mechanisms as linguistic or embodied rituals. In contrast, ritualisation is a concept developed in the socio-legal context of rights mobilisation.

As noted earlier, the possibility of ritualistic mobilisation is unique to the CRPD in that the obligations of conduct enshrined in the treaty document mandate civil society participation in the implementation and monitoring of the treaty itself. Yet, as the CRPD Committee noted in its concluding observations, disabled people, through their representative organisations remain “not sufficiently involved in monitoring the implementation of the Convention”. In fact, one of the CRPD

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80. “Where the concept of ritualism is related to that of ritual, it has distinct and generally negative connotations. It involves rituals that are hollow or ineffective and that lack vitality or resonance”. Benjamin Authers and others, “Introduction” (2018) 9 Humanity: An International Journal of Human Rights, Humanitarianism, and Development 63, 68.
Committee’s recommendations in relation to article 33 was for the Singapore government to “ensure that civil society, in particular a broad range of organizations of persons with disabilities, including organisations of persons with disabilities with sharply critical views of government policies relating to persons with disabilities, are involved and participate fully in monitoring the implementation of the Convention”.\footnote{Ibid., 62(b).}
The rest of this section reveals the context and impetus behind the CRPD Committee’s observations and recommendations on disability participation in the CRPD monitoring process in Singapore.

**Local Civil Society Participation in Singapore’s First Periodic Review Before the CRPD Committee**

In reflecting on the impact of Singapore’s ratification of the CRPD, Wong et al. observed:

> Even though rights have been declared, there is still inadequate agency to drive the realisation of those rights. Greater participation from disabled individuals is needed to shape social policy. This necessitates a shift from passive participation to active involvement and thus requires change from within the disability community.\footnote{Wong and others (n 10) 183.}

Yet, at the same time, many disability organisations are “in a vulnerable position for advocacy” because they depend on state funding to provide services to their disabled clients and must toe the line when it comes to advocating for the rights of disabled people.\footnote{Ibid.} Because of these structural constraints, some scholars have described such service-oriented organisations as “junior partners” of the state:\footnote{Lim, Ng and Chang (n 33) 157; Beng Huat Chua, “The Relative Autonomies of the State and Civil Society” in Gillian Koh and Giok Ling Ooi (eds), State-Society Relations in Singapore (Oxford University Press 2000).}

> Service-oriented groups tend to work closely with their target communities, “facilitating their access to services and coordinating the delivery of inputs from various agencies”. They do not usually pursue alternative policy agendas that diverge from those of the state, and may in fact be “co-opted” by the state. Co-option by the state may translate into state support in the form of benefits, funding, recognition and the taking on certain tasks delegated by the state, and at the same time, relatively little autonomy to pursue their own agendas.\footnote{Yeoh and Annadhurai (n 5) 556.}

In addition, there exists only a handful of disability groups, such as the Singapore Association for the Deaf, the Singapore Association of the Visually Handicapped and the Muscular Dystrophy Association, that qualify as representative organisations in Singapore. The rest of the disability sector in Singapore largely comprises service organisations that do not satisfy the definition of representative organisations set out...
in General Comment No. 7.\textsuperscript{89} Even then, as most representative organisations are recipients of government funding and also work closely with the state to provide services to disabled people, they are “in a vulnerable position for advocacy”.\textsuperscript{90} because they provide services that “fall within the state’s priorities and are fully or almost fully funded by the state” and risk losing their funding and charity registration if they fall into the state’s “bad books”.\textsuperscript{91}

One exception of a representative organisation that participates actively in policy advocacy is the DPA, which was founded in 1981 after Singapore hosted the First World Congress of Disabled People’s International (DPI). For the first few years of its existence, the DPA operated as an ad hoc group under DPI with no formal legal recognition in Singapore until it was registered in 1986. According to Chandran-Dudley, who founded and served as the founding president of the DPA, the DPA’s registration was rejected by the authorities because its constitution had included words like “social justice” and the “equalisation of opportunities” that the authorities considered to be “disturbing”.\textsuperscript{92} It was only after these words were taken out that the group was allowed to be registered. Presently, like most other disability organisations, the group is a registered charity and an institute of public character which allows it to receive tax-deductible donations to fund its operations.

Given the DPA’s mission to provide a platform for all disabled persons to speak up and ensure their voices are heard, it is not surprising that it was the only local representative organisation that participated in Singapore’s inaugural periodic review before the CRPD Committee. Though there were two other parallel reports submitted by local disability organisations, neither qualifies as a representative organisation because they are not led by or made up of a majority of disabled persons.\textsuperscript{93} In terms of timing, if the periodic review was not delayed from October 2019 to August 2022 due to the COVID-19 pandemic, the DPA would have been the only Singaporean organisation to submit a parallel report given that the two other reports mentioned above were not submitted by the stipulated deadline for the 2019 session.

A brief analysis of these two other reports affirms the CRPD’s emphasis on the role of representative organisations as these two parallel reports shed little light on the realisation of disability rights in Singapore and the Singapore government’s performance in implementing the CRPD. As noted in the introduction, one of the other reports was submitted by MINDS, which serves persons with intellectual dis-

\textsuperscript{89} Daryl W. J. Yang, “Realising a Radical Suggestion: Disability Rights and Self-Representation in Singapore”, \textit{Not Without Us: Perspectives on Disability and Inclusion in Singapore} (Ethos Books 2022).
\textsuperscript{90} Wong and others (n 10) 183.
\textsuperscript{91} Lim, Ng and Chang (n 33) 157.
\textsuperscript{92} Kuansong Victor Zhuang, “Enabling the Singapore Story: Writing a History of Disability” in Bruce Lockhart (last) and Tse Siang Lim (eds), \textit{Monograph 42: Studies in Malaysian & Singapore History: Mubin Sheppard Memorial Essays} (MBRAS 2010) 68.
\textsuperscript{93} For completeness, there was also a parallel report submitted by Autistic Minority International which was authored by Wesley Loh, a young autistic self-advocate and co-founder of the WhatsApp Autism Community Singapore (WACS).
abilities and their families. Generally, a parallel report provides a civil society perspective on the progress that the state party has made in implementing the relevant human rights treaty. MINDS’ report however focuses only on what it has done as an organisation and expressly states that it highlights the key initiatives that MINDS has launched in support of the above-mentioned articles [8, 9, 13, 21, 23, 24, 25, 27, 30, and 31] as well as how MINDS can continue to move forward as an organization to further impact the local disability landscape.94

The other report was submitted by a coalition of four service organisations based on a research study conducted by the coalition in collaboration with the Institute of Policy Studies (IPS) at the National University of Singapore (NUS).95 This report similarly does not address Singapore’s implementation of the rights enshrined in the CRPD; instead, it explicitly states that “[w]herever relevant, references are made to the principles encapsulated by the UN CRPD”.96 Ostensibly because of these organisations’ focus on service delivery, the report addresses a very narrow range of issues that touch on the services they provide, namely education, vocational training and caregiver support. While access to and the quality of services are important to enabling disabled people to enjoy their human rights, they are not sufficient in realising all of the rights enshrined in the CRPD.

In contrast, the DPA submitted two substantively much richer parallel reports on Singapore’s implementation of the CRPD, one in September 2019 and a follow-up report in July 2022 as Singapore’s participation in the periodic review was postponed by the onslaught of the COVID-19 pandemic.97 To participate in the CRPD periodic review, the DPA set up a Parallel Report Working Group, which was made up of 21 members with a diverse range of disabilities, to direct the organisation’s participation in the CRPD review process.

Guided by the principle of “nothing about us without us”, the contents and recommendations in the DPA’s parallel reports were “raised and approved entirely by people with disabilities”.98 This is not surprising, considering that the DPA is a representative organisation. It also contrasts with the parallel reports by the other local organisations; for example, the coalition report’s findings were based on focus group discussions with disabled people, caregivers, service providers and “other professionals and community partners interested in the needs of [disabled people]”.99 It does not appear that either

94. Movement for the Intellectually Disabled of Singapore (MINDS) (n 3) 3.
96. Ibid., 1.
98. Disabled People’s Association and CRPD Parallel Report Working Group (n 97) 3
99. APSN and others (n 95) 1.
the coalition report or the MINDS report had taken any steps to centre or prioritise the voices of disabled persons over the other stakeholders.

The DPA’s Participation in the CRPD Periodic Review

Given Singapore’s weak human rights culture, it is no surprise that the DPA was the only local representative organisation to participate in the CRPD review and its reports were the only submissions to critically address Singapore’s implementation of the CRPD. Yet, precisely because of Singapore’s weak human rights culture, the DPA must also carefully approach its participation in the CRPD review.

As a starting point, the DPA’s aim in participating in the CRPD review was not to effect any immediate policy change. Instead, as explained in its 2019 parallel report, the Working Group’s aim in putting together its parallel report was more forward-looking: (i) increasing interest from the disability community in the CRPD; (ii) highlighting the need for the disability community to take ownership of the CRPD and monitor the progress of CRPD implementation in Singapore; and (iii) demonstrating that the implementation of the CRPD and its monitoring is not the purview of the government alone but also that of the disability community. These goals are central to the strategy of ritualisation, which – as discussed below – is aimed at increasing the cultural resonance and political legitimacy of human rights generally and in this case, the CRPD specifically.

This is particularly critical in Singapore’s case because the CRPD represents a diametrically opposite conception of disability, what disability inclusion means and how it is to be achieved from Singapore’s “access-to-inclusion” approach. Clearly, it is not possible nor realistic for the Singapore state or public to adopt the human rights model of disability in Singapore’s very first review before the CRPD. Instead, the DPA’s participation in the CRPD review is aimed at ritualising disability rights in Singapore so that the human rights model of disability can eventually become the dominant paradigm in the country.

To this end, the Working Group organised CRPD trainings and focus group discussions for members of the CRPD Working Group to familiarise them with both the substantive content of the CRPD as well as the periodic review mechanism. Due to the lack of any local expertise in the CRPD, an international disability rights expert, Professor Nagase Osamu from Ritsumeikan University, was specifically flown in from abroad to run multiple workshops to train Working Group members in the CRPD review process. For example, in March 2018, Professor Osamu conducted a report-writing workshop to acquaint Working Group members with the expectations of the parallel report and the challenges that Working Group members may face in the report-writing process.100 This workshop kickstarted the drafting process of what would become the DPA’s 2019 parallel report. Subsequently, in December 2018,

Professor Osamu conducted a one-day training to introduce members to the CRPD monitoring process, including the key timelines, and how members can participate effectively in the interactive dialogues with both the CRPD Committee and the state representatives.\(^{101}\)

At the focus group discussions, participants were invited to share about their experiences with disability discrimination and reframe those experiences through the lens of the CRPD. As a matter of rights mobilisation, these events helped participants to adopt the language of disability rights and fostered a stronger consciousness of themselves as rights-holders in accordance with the human rights model of disability. This has also been referred to as the vernacular mobilisation of human rights, which helps to “cultivate oppositional consciousness and empowerment, and produce a sense of efficacy among participants, increasing their willingness to take up collective action despite difficult political conditions and risks”.\(^{102}\)

As a matter of human rights monitoring, these activities also helped the DPA to define the issues that its parallel report should focus on in terms of what particular rights enshrined in the CRPD have been violated by the Singapore government and needed to be raised to the CRPD Committee. At the same time, because of the weak human rights culture in Singapore, the DPA did not have free rein to simply call out the Singapore government for all of its rights violations, even if some of the Working Group members felt strongly about doing so. As noted above, the group is also a registered charity and institution of public character, which is critical to its ability to fundraise and sustain its operations in the long run. An overly confrontational approach may potentially threaten the group’s ability to renew those statuses. The DPA thus adopted various tactics of ritualistic mobilisation in the preparation of its parallel reports to minimise the risks associated with human rights activism in Singapore.

First, and as noted above, the DPA explained in its reports that its participation is not aimed at criticising the Singapore government for the shortcomings in its policies but to promote disability representation in the monitoring process and increase awareness about the CRPD. This line in the sand between criticism and awareness-raising informed the style and tone of the parallel reports, which had to strike a balance between criticism and compliment.

Generally, given the limited word count, parallel reports are “limited to highlighting the key issues and pointing out the principal concerns related to the implementation of the CRPD”.\(^{103}\) The DPA’s report however went into some detail on existing measures adopted by the Singapore government to recognise its efforts


\(^{102}\) Chua, “The Vernacular Mobilization of Human Rights in Myanmar’s Sexual Orientation and Gender Identity Movement” (n 77) 300.

\(^{103}\) Laura Thetayz-Bergman and Stefan Trömel, “Effective Use of International Human Rights Monitoring Mechanisms to Protect the Rights of Persons with Disabilities” (International Disability Alliance 2010) 57.
before offering its recommendations on areas for improvement. The following paragraph in the introductory section of the 2019 report summarises this two-step approach:

This report recognises the successes of the Singapore Government in making Singapore more accessible, especially with physical accessibility in the built environment, as well as transport infrastructure. However, there still remains work to be done in terms of employment of persons with disabilities, social and educational integration, as well as mainstreaming disability in recreational and community spaces.¹⁰⁴

The parallel report also does not explicitly state that the Singapore government has acted or omitted to act in violation of any rights enshrined in the CRPD. Instead, each recommendation is followed by a reference to the relevant provisions of the CRPD without providing an evaluation as to whether the Singapore government has acted in compliance or in violation of those provisions.

Some of the recommendations were also phrased in a more tentative manner rather than as steps that Singapore should take to comply with the CRPD. For example, in relation to article 28 on the right to an adequate standard of living and social protection, the DPA only urged the government to “reconsider the adequacy of its social security framework” and “review the sufficiency of subsidies in covering the medical, transportation and caregiving support services’ costs for persons with disabilities”.¹⁰⁵

Another stylistic feature of ritualistic mobilisation is the use of third-person language in relation to issues that are more controversial or risky. For example, in relation to issues of criminal justice, the DPA’s report did not directly highlight potential areas of non-compliance from its own perspective. Instead, it phrased those concerns as emanating from “disabled advocates” generally to create some distance between itself and those issues.¹⁰⁶ In this regard, it may also be possible to analyse the participation of MINDS and the disability organisations involved in the coalition report as a much more rudimentary form of ritualistic mobilisation because of their greater proximity to and dependence on the state. Notably, both reports do highlight some areas for improvement and offer some policy recommendations which are worded very generally and not directed to the state. For example, the MINDS report notes that while healthcare professionals in specialist clinics for children with intellectual disabilities may have been trained to work with these children, there remain barriers to accessibility and effective healthcare management in the mainstream public health system which most of these children would also access on a more regular basis.¹⁰⁷ Similarly, in relation to the introduction of new technologies like virtual platforms and contact tracing applications during the COVID-19 pandemic, the coalition report noted that efforts should be undertaken to ensure accessibility of those new technologies to prevent persons with disabilities from

¹⁰⁴. Disabled People’s Association and CRPD Parallel Report Working Group (n 97) 2.
¹⁰⁵. Ibid., 19.
¹⁰⁷. Movement for the Intellectually Disabled of Singapore (MINDS) (n 3) 24.
being left behind. In both cases, the role or responsibility of the state in addressing these issues is conspicuously left unaddressed.

Second, in terms of the substance of the parallel reports, the DPA was judicious about the issues that were raised in the parallel report. Rather than focus on what might be dismissed as ideological issues which lack public support or are of little interest to the general disability community, the parallel report emphasised bread-and-butter issues that would more likely be taken seriously by both the state and the public. Thus, the primary concern of the 2019 parallel report was the employment of disabled Singaporeans. As explained in the very first paragraph of the report:

[W]hile the various articles of the CRPD play an important role in the lives of people with disabilities, employment is particularly critical in increasing the independence of people with disabilities [...] is a gateway to accessing other important resources such as healthcare, transport, housing and engagement in social and recreational activities. Beyond that, the independence that employment affords many persons with disabilities can help to overturn assumptions about those with disabilities being dependent on their families, caregivers or the state.

While the 2022 parallel report also focused on issues of employment, it also expanded its scope to address the effects of the COVID-19 pandemic as well as the execution of Dharmalingam, the intellectually disabled man who was executed in April 2022 for drug trafficking offences. Notably, the DPA had omitted to address issues of criminal justice in its 2019 parallel report but was able to touch on this issue because Nagaenthran’s execution had generated such intense international attention on Singapore’s criminal legal system that it was no longer taboo for the DPA to address the issue. This issue was entirely unaddressed in the other local submissions.

Indeed, the DPA was one of the few, if not the only, Singaporean disability groups to raise concerns about Nagaenthran’s execution in public discourse. This contrasted with the significant international advocacy on the issue: human rights bodies and experts, including the Special Rapporteur on the rights of persons with disabilities, had called on the Singapore government to commute Nagaenthran’s death sentence to life imprisonment. Nevertheless, the DPA did not go so far as to call for the abolition of capital punishment, which is arguably a sacred cow in Singapore’s war on drugs. Instead, the report merely suggested that his case “raises concerns” as to Singapore’s compliance with article 13 of the CRPD, specifically whether disabled persons are given sufficient procedural accommodations to ensure equal access to justice.

108. APSN and others (n 95) 49.
109. Disabled People’s Association and CRPD Parallel Report Working Group (n 97) 1.
110. Disabled People’s Association, “Comment on the Case Surrounding Mr. Nagaenthran Dharmalingam” <https://www.facebook.com/DisabledPeoplesAssociation/posts/pfbid02nVrC2B-Js3k7QeWDbpgRhiBAyhvftQvYg3yaceXcIp7ojr1ehStQo8WdC7MwX954mlSl>
To a reader unfamiliar with rights mobilisation in non-liberal societies, the DPA’s participation in the CRPD periodic review might come across as half-hearted, deferential or even restrained. Such a reader might also wonder why an organisation like the DPA might even bother participating in the monitoring process, considering the low probability that its rights-based recommendations would be adopted by the Singapore government and the potential risks of human rights activism. Having demonstrated that the DPA’s participation should be understood through the lens of ritualistic mobilisation, this section reveals how the DPA’s tactics of rights mobilisation contribute to its long-term goal of ritualising disability rights in Singapore.

The DPA’s participation in the CRPD monitoring process also sends a signal to other activists and organisations that it is possible to engage with the CRPD without necessarily putting oneself or one’s organisation at risk. Indeed, the participation of MINDS and the disability organisations behind the coalition report may also help to encourage other service organisations to submit their own parallel reports in future iterations. Looking ahead, while the process of ritualisation is necessarily a drawn-out one, some of the indications of ritualisation in the coming years would include increased participation of disability organisations, particularly representative organisations, and disabled persons in the CRPD monitoring process as well as increased awareness of and interest in the CRPD among disabled persons.

**Conclusion**

This paper examined how the obligations of conduct in the CRPD have not only enshrined the disability rights movement’s principle of “nothing about us without us” but also carved out opportunities for activists in non-liberal environments where rights mobilisation is otherwise shunned to mobilise disability rights in a ritualistic manner. It also developed the concept of ritualisation to explain the longer-term goals of disability rights activism in societies with a weak human rights culture, where the DPA’s participation in the CRPD monitoring process is not necessarily to demand for immediate change but to gradually engender the dominance of the human rights model of disability in Singapore. This is a nuanced but important revelation that should not be dismissed or misunderstood just because it does not mirror the more direct or unreserved approach that characterises the mobilisation of human rights in Western liberal societies.

At the same time, as this paper has focused only on what is only the first chapter of the CRPD’s story in Singapore, follow-up research on the mobilisation and monitoring of the CRPD in Singapore is necessary to evaluate whether tactics of ritualistic mobilisation can indeed lead to the ritualisation of disability rights in Singapore. As it currently stands, it does not appear that the DPA has suffered any state reprisal for its participation. Yet, as a general observation, it is hypothetically possible under non-liberal, authoritarian conditions – where the state has a toolbox of coercive measures against civil society activists – that state actors may consider such ritualistic mobilisation to still be such a threat to its legitimacy or authority as to punish those organisations or activists who do participate in the CRPD review process. Ritualisation
as a process may thus ultimately be forestalled by the state, which can exploit its dominance – or even monopoly, depending on the specific political conditions – over the use of force and the media to mould public attitudes towards disability issues and disability activists alike.

In terms of future research directions, a follow-up study may be necessary to examine the effects of ritualistic mobilisation and whether disability rights have become ritualised in Singapore over time. From a socio-legal perspective, comparative case studies on civil society participation in the CRPD review process in other jurisdictions with similarly unfavourable political conditions may offer new insights and refine the concept of ritualisation. For example, it may disclose factors which increase or reduce the likelihood for activists to participate in the ritualisation of disability rights. From an international human rights law perspective, it may also be worth examining whether ritualisation is a process that is unique to the CRPD because of its obligations of conduct or if it may also be identified in relation to other human rights mechanisms.

Finally, this article’s discussion on the methods by the DPA to advocate for disability rights in Singapore is instructive to the global pursuit of disability rights in three ways. First, other disability activists in Singapore and similar non-liberal societies with a weak human rights culture can consider adopting similar tactics of ritualistic mobilisation to realise disability rights in their societies. Second, from the perspective of evaluation, it can assist funders and activists in developing a more clear and nuanced appreciation of how rights mobilisation can take place across contexts. Finally, from the perspective of drafting, it highlights the importance of the obligations of conduct enshrined in articles 4(3) and 33(3) of the CRPD that drafters of future human rights conventions should consider including to facilitate the ritualisation of human rights in non-liberal societies.