

# Australian Council for International Development

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Guidance for the Development of a Disability Inclusion Policy



AUSTRALIAN  
COUNCIL  
FOR  
INTERNATIONAL  
DEVELOPMENT

# Introduction

ACFID members are committed to the empowerment of persons with disabilities as per the ACFID Code of Conduct [Commitment 2.3](#). In addition, ACFID members are committed to respecting and protecting human rights ([Commitment 1.1](#)) and to respecting and responding to the needs, rights, and inclusion of those who are vulnerable and those who are affected by marginalisation and exclusion ([Commitment 1.2](#)).

Importantly, members are duty bearers committed to the United Nations Convention on the Rights of Persons with Disabilities (CRPD) which requires that: “...international cooperation, including international development programmes, is inclusive of and accessible to persons with disabilities.”<sup>i</sup> In line with this, persons with disabilities are no longer viewed as objects of charity, rather they are rights holders entitled to the full array of human rights, and are entitled to enjoy those rights on an equal basis with others.

Disability inclusion is also a cross cutting priority for Australia's international engagement in development, humanitarian action, and human rights. [Partnerships for Recovery: Australia's COVID-19 Development Response](#) reaffirms Australia's focus on those experiencing greatest vulnerability, including persons with disabilities. This is articulated in the Australian Department of Foreign Affairs and Trade's (DFAT) *Development for All 2015-2020: Strategy for strengthening disability inclusive development in Australia's aid program*<sup>ii</sup> (extended to 2021) and within requirements for Australian NGO Cooperation program (ANCP) Accreditation.<sup>iii</sup>

Developing a statement, guidance document or disability inclusion policy is an important foundational step for ACFID members to demonstrate organisational commitment to disability inclusion.

The guidance helps your organisation meet ACFID [Compliance Indicator 2.3.1](#), while also cross-referencing requirements for DFAT Accreditation, and supporting your organisation to implement its obligations as a duty bearer.

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Taulau of Savaii, Samoa, practices using her new prosthesis in her home with the help of two local service staff. Photo: Motivation Australia.

# Purpose of the Guidance

The **primary purpose** of this guidance is to provide practical tips to assist ACFID members to develop and implement a disability inclusion policy. This guidance will help meet your organisation's obligations under the ACFID Code of Conduct.

Under the ACFID Code of Conduct [Commitment 2.3](#) there are four Compliance Indicators. Each of these Compliance Indicators has a Verifier, which describes the evidence that members are required to have to comply. This guidance is focused on supporting members to comply with [Compliance Indicator 2.3.1](#):

A **secondary purpose** is to share examples of how diverse member agencies have gone about developing and implementing a disability inclusion policy. It is expected this will assist organisations to informally benchmark their own journey and promote continuous improvement. This will also help inform organisations who are wanting to improve their disability inclusive development practices and/or are seeking DFAT Accreditation.

## BOX 1: CODE REQUIREMENTS RELATED TO 2.3.1

Compliance indicator	Verifier
Members demonstrate an organisational commitment to the inclusion of people with disabilities.	Policy, statement, or guideline document that commits the member to the inclusion of people with disabilities.

This document provides guidance to ACFID's members to produce a policy document that:

- States the organisation's intent, position, and principles with regards to disability inclusion.
- Describes the organisation's expectations of staff, consultants, volunteers, and partners and other key stakeholders.
- Defines key terms.
- Outlines alignment with the CRPD, and other relevant internal and external policies and commitments; and
- Clarifies roles and responsibilities for policy implementation, monitoring, and review.

**NOTE:** This document predominately focuses on developing a policy, as compared with a statement or guidance document mentioned in the Verifier. A statement is typically brief in nature and often high-level, while a guidance document provides detailed and practical how-to advice. The [Resources section](#) provides useful references for organisations wanting to develop detailed guidance.

# Scope, Language and Disability Models

## SCOPE

Disability inclusion is an ongoing and evolving process for your organisation, not a destination. This is because organisations are constantly changing, as is the sector's thinking and learning around disability inclusion, and also the priorities of the Disability Movement. Given the intersecting nature of inclusion, and the transformative power of inclusion, embracing progress in disability inclusive practice has the potential to be a rewarding process for your organisation and your programming effectiveness. To experience this, however, disability inclusion needs to be embraced as an opportunity for reflection, learning and growth, rather than compliance.

To make the best use of this guidance, use it as a guide to gauge not only where your organisation is currently sitting in the ongoing process of disability inclusion, but also where you want to proceed to, and by when.

ACFID members are diverse and have different missions, commitments, and resourcing. The guidance will likely be most useful for smaller organisations, but the guidance captures diverse experiences to assist all ACFID members to develop, review and/or revise their disability inclusion policy and practices.

For those organisations seeking DFAT Accreditation, it is important to be aware of any additional or different requirements. This guidance has been commissioned by ACFID so will focus on ACFID compliance. However, cross-references are made to DFAT Accreditation requirements throughout.

A mapping of the ACFID and DFAT Accreditation requirements is provided in [Annex 1](#) to highlight the different expectations.

Disclaimer: This document does not provide comprehensive advice on how to comply with DFAT Accreditation requirements. DFAT's latest [ANCP Accreditation Manual](#) should be referred to. In addition, separate and tailored advice should be sought from DFAT and/or an independent expert, as needed. Please also refer to the [Resources section](#) for other useful references.

There is strong demand for advice and guidance from ACFID members across a broad range of topics including DFAT Accreditation requirements, and various programmatic, organisational, and thematic topics. This guidance is focused on developing and implementing a disability inclusion policy. Some resources have been provided at the end of the document for further reading, but this is not exhaustive.

## LANGUAGE

**BOX 2: NOTE** This section is not exhaustive. For a comprehensive list of terms please refer to the [CBM Disability Inclusive Development Toolkit](#) (pages 157-165) and other references in the [Resource section](#) of this guidance.

### Definition of disability

The United Nations Convention on the Rights of Persons with Disabilities (CRPD) does not define 'disability' per se but notes the following:

"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." (Article 1)

This is how disability is defined in the ACFID Code of Conduct



Figure 1: The interaction between impairment, barriers, and disability<sup>iv</sup>

Barriers prevent persons with disabilities from enjoying their rights. Barriers can be grouped into four categories: physical and transportation, communication, institutional, and attitudinal.

### BOX 3: TYPES OF BARRIERS

**Physical and transportation barriers:** buildings, schools, clinics, water pumps, public transport, roads, baths, etc.

**Information and communication barriers:** including information and communications technologies and systems. This also includes written and spoken information such as media, flyers, Internet, and community meetings.

**Institutional barriers:** including both legislation that discriminates against people with disabilities and/or an absence of legislation that might otherwise provide an enabling framework. It also includes the absence of policies and budgets that support access and inclusion.

**Attitudinal barriers:** including negative stereotyping of people with a disability, social stigma, harmful social norms, and other forms of overt discrimination.

NOTE: Persons with disabilities have diverse impairments and identities and live in different contexts. Therefore, they face different barriers and experience barriers differently. Conducting a Gender Equality, Disability, and Social Inclusion (GEDSI) analysis can uncover these differences. Please see later discussion on [GEDSI](#).

### Person with disabilities or disabled person

In line with the CRPD, 'persons with disabilities' is the terminology used in this guidance. This uses person-first language and is based on the importance of defining the person first, before the impairment or disability. It is suggested that organisations developing or revising a policy also use the 'persons with disabilities' phrasing.

However, once you have an established relationship with persons with disabilities or an Organisation for Persons with Disabilities (OPD), you should ask how they want to be referred to. In different cultural contexts, there are preferred phrases, and people with different impairments prefer different terms.

### BOX 4: RESOURCE – SUGGESTED TERMINOLOGY

[CBM's Disability Inclusive Development Toolkit](#) provides a useful list of common phrases to avoid and suggested alternatives (pages 28-29).

It is also important to understand how this phrasing will translate to the working language/s used by local partners and project participants. For example, translating "persons with disabilities" directly in some contexts may not make any sense. If you are unsure, a local OPD can provide advice on the appropriate language.

### Organisation of persons with disabilities or disabled people's organisation (DPO)

This guidance chooses to use OPD as this term is consistent with the above concept of using person-first language. The term is emerging, and it needs to be noted that it is an alternative term for a DPO, which is common terminology used in the sector.

### BOX 5: ROLES AND FUNCTIONS OF OPDs

Further information on the roles and functions of OPDs is available from the Special Rapporteur on Rights of Persons with Disabilities [Report on the Rights of Persons with Disabilities to Participate in Decision-Making](#).

OPDs are set up and led by persons with disabilities to represent and support their members. Some are impairment- or disability-specific while others are 'cross-disability' OPDs that represent a variety of members.<sup>v</sup>

OPDs also represent persons with disabilities with diverse identities like women with disabilities, youth with disabilities, LGBTQI<sup>vi</sup> persons with disabilities, indigenous persons with disabilities, and people of other identities.

### Gender equality, disability, and social inclusion (GEDSI)

Different organisations frame disability inclusion using different phrases, for example, Gender Equality and Social Inclusion (GESI) or Gender Equity and Diversity.

The ACFID Code of Conduct does not have a stance on which term is preferred, however this guidance suggests the use of Gender Equality, Disability, and Social Inclusion to specifically highlight disability inclusion. Persons with disabilities are the world's largest minority representing 15% of the population so it is important disability is not lost in these phrases.

Furthermore, "equality" is used as equality is the goal and equity are one pathway to that goal. Social inclusion is used to incorporate all persons of diverse identities.

## MODELS OF DISABILITY

There are four main models of disability:<sup>vii</sup>

The **charity model** focuses on the individual and tends to view persons with disabilities as victims, or objects of pity. It assumes that it is the community and society's responsibility to arrange all services for these vulnerable people.

The **medical model** also focuses on the individual and sees disability as a health condition, an impairment located in the individual. In this approach, a person with disability is primarily defined as a patient. Disability is seen as a disease or defect that needs to be fixed or cured.

The **social model** focuses on society and considers that the problem lies with society, and that due to barriers, persons with disabilities are excluded. This approach focuses on reforming society, removing barriers to participation, raising awareness, and changing attitudes, practice, and policies.

The **rights-based model** is based on the social model and shares the same premise that it is society that needs to change. This approach focuses on equity and rights and looks to include all people equally within society. It is founded on the principle that human rights for all human beings is an inalienable right and that all rights are applicable and indivisible. It takes the CRPD as its main reference point and prioritises ensuring that duty bearers at all levels meet their responsibilities. This approach sees persons with disabilities as the central actors in their own lives as decision makers, citizens and rights holders. As with the social model, it seeks to transform unjust systems and practice.

The first three focus on the source of the problem, whilst the last focuses on finding solutions and creating an enabling environment for all.

This guidance promotes the rights-based model.

# Approaches and Principles

## HUMAN RIGHTS BASED APPROACH

A Human Rights-Based Approach (HRBA) sees those in power – such as international non-government organisations (NGOs) and partner organisations – as duty bearers to ensure persons with disabilities enjoy their rights.

There are some underlying principles which are important in applying a HRBA, known as the PANEL Principles ([see Annex 2](#)).<sup>viii</sup> It is the responsibility of organisations in the international development sector to intentionally embody these principles in their work and organisational structures, with the aim of removing barriers that prevent persons with disabilities from accessing such rights.

In addition, the CRPD lists the following as elements of a rights-based approach with regard to persons with disabilities, some of which overlap with the PANEL principles:

- Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons.
- Non-discrimination.
- Full and effective participation and inclusion in society.
- Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity.
- Equality of opportunity.
- Accessibility.
- Equality between men and women<sup>ix</sup>.
- Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities.

### BOX 6: USE OF RIGHTS-BASED LANGUAGE

A rights-based approach can sometimes be considered a 'Western imposition' by actors in some countries. In other contexts, such as fragile states and post-conflict settings, use of rights-based language may even be considered counter-productive.

However, for the most part, many of the countries in which development and humanitarian programs are implemented, have signed and/or ratified the CRPD.

Therefore, in line with ACFID's commitment to a human rights-based approach, it is appropriate, where safe to do so, for members to use rights-based language and hold governments and other stakeholders to account for their disability inclusion commitments.

You can find a list of signatories and parties to the CRPD at the following links:

You can browse the [list of signatories to the CRPD](#) and the [list of signatories to the Optional Protocol to the CRPD](#)

## TWIN-TRACK APPROACH

This approach, which is also in line with DFAT's Development for All Strategy (2015-2020), recognises the need for:

**TARGETING** - providing disability-specific initiatives to support the empowerment of persons with disabilities (for example, a vocational skills project which specifically targets persons with disabilities); and

**MAINSTREAMING** - integrating disability-sensitive measures into the design, implementation, monitoring

and evaluation of all policies and programs (for example, mainstreaming disability in areas such as human resources and budgeting). The twin-track approach to inclusion can only lead to successful outcomes for persons with disabilities if emphasis is put on both tracks, as they complement each other. Please refer to the [Australian Disability and Development Consortium's website](#) for a further explanation and case studies.

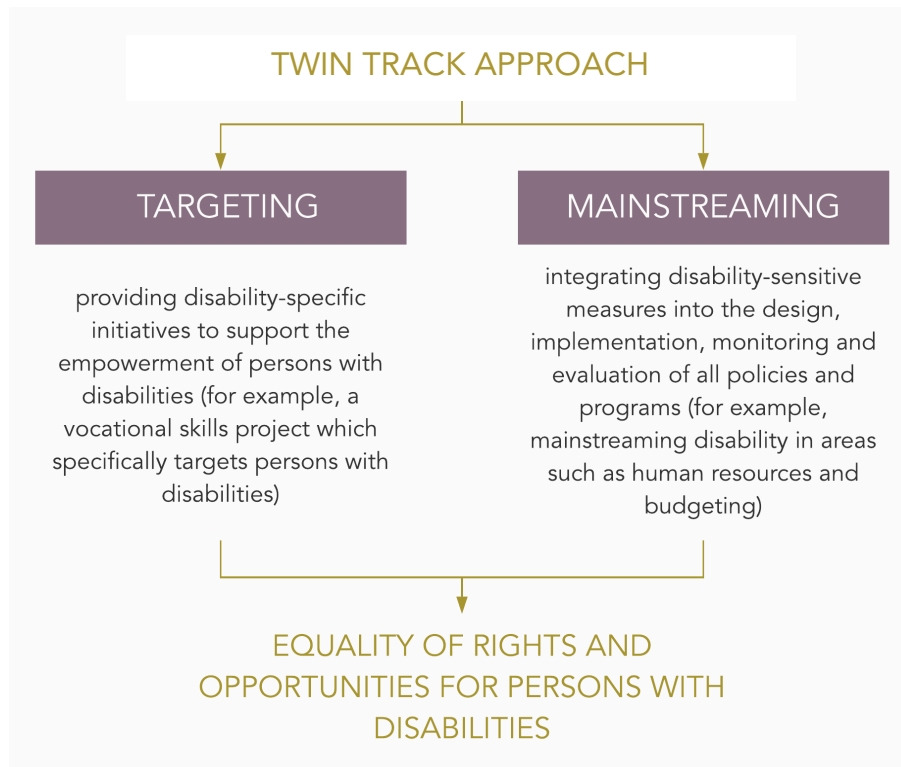


Figure 2: Twin Track Approach



Ndeto Mukwayu, aged 62, and living in rural Makueni County in Kenya, has always been cared for by his mother. ABM's partner, Anglican Development Services Eastern, conducts disability-inclusion awareness-raising in the local communities. This led to Ndeto linking to the Kenyan National Council of People Living with Disabilities and getting a beneficiary card. This card facilitates Ndeto's medical check-ups, and, during the COVID-19 lock-down he got government support of two thousand Kenya shillings for three months. The project also provided Ndeto with a galla goat to breed for ongoing income for himself and his mother, and as a food source. Photo: Anglican Board of Mission (Australia).

## GENDER EQUALITY, DISABILITY, AND SOCIAL INCLUSION (GEDSI)

Disability is not a homogenous experience. People with different identities and different impairments will experience very different types of barriers. For example, the lived experience of women with disabilities is different to people of other genders, and a deaf person will face different barriers to a person with a sight, physical, sensory, or psychosocial impairment.

Other factors can also affect the experiences and opportunities of persons with disabilities. They include, but are not limited to: age, gender identity, gender expression, sexual orientation, race, indigenous status, ethnicity, caste, HIV/AIDS status, whether the impairment was acquired at birth or later in life, education, social status, wealth, political awareness and where they live (rural/urban), or live in a developed or developing country.

Often, different identities can interact to further marginalise people, for example numerous studies have shown that women with disabilities are at greater risk of gender-based violence.<sup>x</sup> In addition, First Nations people are 2.1 times more likely to have a disability than the rest of the population.<sup>xi</sup>

A GEDSI analysis not only helps your organisation understand barriers for persons with disabilities of diverse identities, but it also helps identify opportunities to inform inclusive programming. For support in conducting this analysis, one resource is [CBM's Disability and Gender Equality Analysis Toolkit](#).

## CORE PRINCIPLES OF DISABILITY INCLUSIVE DEVELOPMENT<sup>xii</sup>

### Awareness

Persons with disabilities are often marginalised and do not have their voices heard, particularly within 'mainstream' settings, either through deliberate discrimination or due to other factors that mean they are not included or considered. As the CRPD (Article 8) notes, there is a need to: raise awareness throughout society to foster respect for the rights and dignity of persons with disabilities; to combat stereotypes, prejudices, and harmful practices; and to promote awareness of the capabilities and contributions of persons with disabilities, in the workplace, labour market, and society.

### Participation

The mantra of the disability community is 'Nothing About Us, Without Us' and this is reflected in how the CRPD conceptualises the involvement of persons with disabilities in all aspects of life. Persons with disabilities must be included in decisions about every aspect of their lives and every aspect of the country's development.

### Comprehensive accessibility

The CRPD (Article 9) notes:

"To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas."

A common misconception is that accessibility is only about physical access, however persons with disabilities have different access requirements, for example, for the deaf, or for persons with sight and other impairments.

Ultimately, by removing barriers and ensuring a society accessible for persons with disabilities, you are ensuring a society accessible to all.

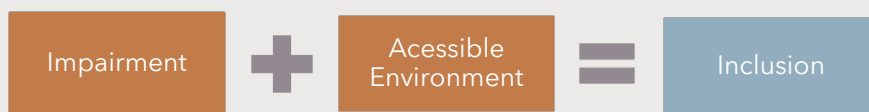


Figure 3: The interaction between impairment, accessible environment, and inclusion<sup>xiii</sup>

### Universal design

The CRPD (Article 2) notes:

“‘Universal design’ means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. ‘Universal design’ shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.”

Universal Design recognises that there is a wide spectrum of human abilities. Everyone passes through childhood, periods of temporary illness, injury and old age. By designing for this human diversity, it is possible to create things that will be easier for all people to use.<sup>xiv</sup> Further information on universal design can be found at [www.universaldesign.com](http://www.universaldesign.com).

### Reasonable accommodation

The CRPD (Article 2) defines this as:

“... necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms”.

# ACFID Disability Inclusion Policy Requirements

## CHOOSING YOUR FORMAT

ACFID's Code of Conduct allows members three options to express their commitment to disability inclusion: a statement, guidance document, or policy. The following table provides definitions of each option.

<p><b>STATEMENT</b></p>	<p>A statement is a clear and often brief expression of an organisation's commitment to disability inclusion. This is often included in a broader policy on diversity and inclusion, and/or anti-discrimination.</p> <p>An organisation is expected to behave in accordance with the statement, but it is often not formally monitored.</p> <p><b>Note:</b> Even if the statement is brief in length, for ACFID members other documents and frameworks are needed to ensure compliance with:</p> <p><a href="#">Indicator 2.3.2:</a> Members' planning process includes consultation with people with disabilities and contextual analysis of the barriers to social inclusion and participation.</p> <p><a href="#">Indicator 2.3.3:</a> Members promote opportunities for people with disabilities and/or their representative organisations to participate in decision-making.</p> <p><a href="#">Indicator 2.3.4:</a> Members monitor and evaluate their progress in promoting the empowerment of people with disabilities.</p>
<p><b>GUIDANCE DOCUMENT</b></p>	<p>A guidance document outlines an organisation's expectations for a given process; a guide for a course of action or activities that can include rules, checklists, plans, and procedures.</p> <p>A guidance document typically provides relevant statistics, how-to advice on implementing specific elements of disability inclusion at the organisational and program level, and further resources. It could detail the procedures which outline the step-by-step process that is expected to be followed by all staff. This could be for all aspects of disability inclusion or for certain aspects like data collection and consultation.</p> <p>An organisation is expected to behave in accordance with its guidance, but it is often not formally monitored.</p>
<p><b>POLICY</b></p>	<p>A policy outlines the organisation's principles, rules, and position to guide conduct and reach its long-term goals. It therefore lays out an organisation's intent on disability inclusion, to guide and determine decisions.</p> <p>This is often supported by a strategy, procedures, standards and/or action plan which detail the specific actions, and roles and responsibilities for operationalising the policy.</p> <p>An organisation is expected to behave in accordance with its policy, and this is usually monitored.</p>

Table 1: The differences between a statement, guidance document, and policy

The format in which your organisation expresses its commitment to disability inclusion will depend on a number of factors. Whilst ACFID does not stipulate which form members must choose, your chosen format needs to suit the size and nature of your organisation to ensure that implementation is realistic and appropriate. You will need to consider whether to have:

- A stand-alone policy on disability inclusion, or
- A combined policy on inclusion that may cover other factors such as gender and diversity (a 'GEDSI' approach), noting it does need to specifically address inclusion of people with disabilities, and/or
- A Guidance document, as described in [Table 1](#), and/or
- A Statement, as described in [Table 1](#), noting it is recommended that any such statement be made transparent on your organisation's website.

In order to make these decisions you might consider:

- Whether your organisation receives DFAT or other international donor funds and the need to comply with their disability inclusion requirements;
- The mission of your organisation. For example, an organisation which has a specific focus on disability-inclusive development in their mission, should have a standalone disability inclusion policy rather than a blended inclusion policy, and best practice for these organisations is to also have documented procedures/guidance in place;
- The size of your organisation. For example, it may be more appropriate for a larger organisation to have a stand-alone policy, and a smaller organisation to have either a combined policy or an alternative format such as Guidance or Statement.

## ELEMENTS TO SUPPORT YOUR POLICY

Alongside an organisational policy, there are other important elements that will help ensure organisations and programs are inclusive of, and accessible to, persons with disabilities.

### ANALYSIS

Consistent evidence of consultation with persons with disabilities and contextual analysis of the barriers to social inclusion and participation (see [Compliance Indicator 2.3.2](#)).

### DESIGN AND CONSULTATION

Consistent evidence of persons with disabilities and/or their representative organisations participating in decision-making about the initiatives that affect them (see [Compliance Indicator 2.3.3](#)).

### MONITORING, EVALUATION AND LEARNING

Consistent evidence of the assessment of progress in promoting the empowerment of persons with disabilities (see [Compliance Indicator 2.3.4](#)).

### ACCOUNTABILITY

A strategy, procedures, action plan or standards which clearly articulates how the organisation will implement the policy through its operations and programs. A strategy also clarifies the roles and responsibilities, specific targets and actions, measures of success, and the review period. This could be addressed inside a policy, or in a separate accompanying document.

A community consultation held in Vao, Vanuatu, to determine possible options to improve access to mobility device services. Photo: Motivation Australia.



# Steps to Develop and Implement a Disability Inclusion Policy

This section outlines the suggested steps to develop and implement a disability inclusion policy.

## 1. DESK REVIEW

As a starting point, it is important for your organisation to conduct a desk review of relevant documentation. This will help familiarise your organisation with international commitments, Australian legislative requirements, donor and ACFID expectations, peer experience, as well as sector standards and best practice. This includes, but is not limited to:

### International commitments and agreements

- United Nations Convention on the Rights of Persons with Disabilities
- Sustainable Development Goals (SDGs)
- Incheon Strategy
- Pacific Framework on the Rights of Persons with Disabilities (PFRPD) for organisations with programs in the Pacific
- Association of Southeast Asian Nations (ASEAN) Enabling Master Plan

#### BOX 7: TIP - CONDUCTING DISABILITY ANALYSIS IN DIFFERENT COUNTRY CONTEXTS

The CRPD and Universal Periodic Review (UPR) Country Reports are a very useful way to understand the local contexts in which you work.

CRPD reports can be found on the website of the [United Nations Office of the High Commission for Human Rights](#) (OHCHR). Go to the 'Human Rights by Country' menu tab, insert a country and then you have access to all the State reports for the CRPD and other Conventions.

UPR reports can be found on the [OHCHR website](#) 'Documentation by Country' page.

### Australian legislation

Many members include reference to Australian legislation in their disability inclusion policies. As an Australian-registered entity, your organisation has a range of legislative obligations including those that relate to disability inclusion. It is important that you

familiarise yourself with these obligations or refresh yourself on any amendments. The legislation includes, but is not limited to:

- Disability Discrimination Act 1992 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Age Discrimination Act 2004 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Fair Work Act 2009 (Cth)

There are also state laws which may apply to your organisation depending on your office locations, such as the Equal Opportunity Act 2010 (Victoria)

In addition, there are other regulatory documents and standards which should be reviewed:

- Disability (Access to Premises – Buildings) Standard 2010 (Cth). The Standards seek to ensure that persons with disabilities in Australia have dignified, equitable, cost-effective, and reasonable access to buildings, facilities, and services.
- The National Disability Strategy 2010-2020 may be useful, particularly for members who have programming in Australia. **Note:** at the time of writing, the next iteration of the strategy is due to be released in 2021. Therefore, if this is of interest, please monitor the Australian Department of Social Services website for updates.<sup>xv</sup>

Links to all of the above references can be found in the [Resources section](#).

If you only work on programs in one country (other than Australia) or are working with a local partner to develop a disability inclusion in their context, please consult the respective country's legislation and other reports as per Box 7.

### ACFID requirements

Please refer to the [previous section](#) and the ACFID Code of Conduct and [Good Practice Toolkit Commitment 2.3](#).

### Donor policies and expectations

DFAT is recognised as a global leader in disability inclusive development. DFAT's Development for All Strategy is the key donor policy for members. This strategy reaffirms that disability inclusive development is a priority for Australia's international engagement and for DFAT-funded development and humanitarian programming. Other relevant policy frameworks include [Partnerships for Recovery: Australia's COVID-19 Development Response](#) and the [Foreign Policy White Paper](#).

In addition, [Annex 1](#) maps ACFID requirements with DFAT Accreditation requirements for your reference.

### Peer policy examples

Peers can offer first-hand relevant experience in developing and implementing a disability inclusion policy.

It can also be useful to understand where your peers are to help benchmark your own disability inclusion journey. If you are 'behind' your peers, this can be leveraged to help gain leadership buy-in to advance the disability inclusion agenda.

If you already have some peer organisations in mind, search for their disability inclusion policy online. Most organisations have their policies on their websites which can provide examples and offer insights on areas to consider.

## 2. CONSULTATION WITH INTERNAL AND EXTERNAL STAKEHOLDERS

In terms of sequencing, it is suggested to conduct substantive consultations with external stakeholders first. This will help you understand the lived experiences of persons with disabilities, donor expectations, how your organisation compares to peer organisations, and what resources might be available to support you in developing or revising a policy. This can also be useful in your internal discussions and advocacy, as needed, with management.

Stakeholders include:

### Persons with lived experience of disabilities

As duty bearers, your organisation has an obligation to consult persons with disabilities and/or their representatives, including OPDs. This can be challenging in some contexts but should be overcome to ensure persons with disabilities can equitably participate in, and benefit from, your organisation's activities.

As a second option, meeting persons with disabilities in Australia can help you to understand some of the barriers they face in their daily lives. It can also help decision-makers increase their understanding of

disability inclusion, which is critical for leadership buy-in. Through gaining a 'disability lens' you can then work with partners and staff to apply this to your programs and organisation. You can also work to understand different cultural and contextual barriers and how they can be overcome.

### BOX 8: TIP – CONSULTING PERSONS WITH DISABILITIES

Contact a local OPD in-country or in Australia: There are often national umbrella OPDs in the countries or regions in which you work, and many have their own websites. You should clarify upfront with the OPD how much time you are asking them to commit, for what purpose, and ask what their expectation for remuneration is before you begin. If the OPD is expected to play an ongoing substantive role with your organisation, they should be engaged as a partner.

Consider who in your organisation or network has a disclosed disability and is willing to share their story: In the author's case, sharing an interview with her mother who had multiple impairments helped attract significant interest in disability inclusion among staff and management. Of course, in these cases you need to be aware of the privileges Australians hold (including the strong policy environment), and that persons with disabilities of diverse identities who live in different cultural contexts face different barriers. You also need to consider any real or perceived power dynamics between you and the person with disability to ensure they do not feel pressured to share their story.

### BOX 9: EXAMPLE – FEMILI PNG

When developing their Disability Inclusion policy, Femili PNG conducted consultations in Papua New Guinea with a range of stakeholders. This included OPDs, the Australian High Commission, and the Pacific Women Shaping Pacific Development (PWSPD) program through which they were receiving funding.

Through these consultations, Femili PNG was able to better understand the gender equality and social inclusion support available through PWSPD.

### Donor and intermediaries such as Managing Contractors or other NGOs

Several Managing Contractor-managed programs have a Gender Equality and Social Inclusion Advisor (or similar). Some even provide program-specific guidance, training, and peer-learning opportunities on disability inclusion and other topics. Consulting donors or other intermediaries can help your organisation understand their expectations and what tailored support might be available for free before contracting out support.

## Peer organisations

Besides conducting a desk review of policies, it can also be useful to contact peers directly. Peers who are of similar size and mission can be especially helpful in working through some of the specific challenges a particular organisation might face.

## Consultants and advisory groups

Depending on available resources, you can also seek the support of independent consultants and advisory groups to provide technical support, capacity development and other services. The [Resources section](#) is a helpful starting point. There are many independent consultants who can also provide disability inclusive development support.

## Other external suppliers

These suppliers include companies that support your organisation across a range of functions, including but not limited to: website, design, media, communications, fundraising (including face-to-face fundraising, newsletters and mailouts, appeals), shopfronts, customer support (including call centres), and event management.

### BOX 10: RESOURCE – CONNECT WITH THE AUSTRALIAN DISABILITY AND DEVELOPMENT CONSORTIUM

There are opportunities for peer support and input through the Australia Disability and Development Consortium (ADDC). ADDC provides networking opportunities including the Disability Focal Point Network where you can connect with disability leads at other international NGOs, learning and sharing events such as webinars, and monthly bulletins with the latest news in the disability inclusive development sector.

ADDC membership is free and you can sign up on [ADDC's website](#).

Scoping how your current suppliers can adapt their products and services to be more accessible, and the estimated costs is useful preparation for internal discussions. For example, some members seek to have websites which are compliant with [Web Content Accessibility Guidelines \(WCAG\) 2.2](#).<sup>xvi</sup> Having a basic understanding of what is involved and possible costs supports your engagement with colleagues.

## Internal stakeholders (staff, volunteers, partners, and Governing Body)

Organising a disability inclusion awareness session before formally consulting internal stakeholders will help ensure a common understanding of the evidence, definitions, and disability inclusive development principles. Where an organisation is conducting a

review of an existing policy, this session can be adapted to meet different needs and serve as a useful reminder for staff. [End the Cycle, DID4All](#), and the [Australian Disability and Development Consortium](#) website all have useful resources to support awareness raising sessions. This includes videos, case studies, fact sheets, training and facilitation guides and other resources.

### BOX 11: TIP – RESOURCING FOCAL POINT/S AND CONSULTING STAFF TO INFORM THE POLICY

Prior to developing or revising a disability inclusion policy, it is good practice to identify a disability inclusion focal point who is resourced to lead this. Ideally, multiple champions (such as a working group or informal collective) can also support the process.

In most contexts, persons with disabilities experience high levels of stigma and discrimination and their rights are not upheld or are even abused. Discriminatory attitudes are often also held by your staff, partners, and/or other key stakeholders. As a result, there may be some pushback and resistance to working with persons with disabilities. However, such resistance needs to be overcome to ensure persons with disabilities can enjoy their rights.

Having multiple internal focal points and champions can help your organisation take a proactive approach to supporting staff and partners through this change management process. Understanding your organisation and context, you can work with colleagues to anticipate some of the potential resistance: Who will you be talking to? What are their interests and what concerns may they have?

Often, it is helpful to have relevant statistics, information, and examples of disability inclusion, including from peer organisations where appropriate, to support your discussions. Inviting persons with disabilities to talk directly to staff, where it is safe to do so, can also be helpful to avoid “othering” and break down myths, stigma, and harmful social norms.

## 3. DRAFTING A POLICY

This section outlines the key steps for drafting the policy, including considering the authorship and resources available, conducting workshops, developing the policy, seeking feedback, and preparing for endorsement.

### Resources

Firstly, you need to consider what resources you have available to support the development of the policy. This will help determine the process.

- Do you have in-house expertise on disability inclusion or “critical friends” (such as peers, volunteers, members) who can support this process (voluntarily or paid)?
- Do you have the time to develop/review the policy internally considering your ambition?
- Do you have the resources (people, time, funding) to:
  - Conduct workshops?
  - Engage an external resource to lead the development and/or provide technical review of the policy?
  - Consult on the policy (in-country or remote)?
  - Publish the policy, for example, graphic design support (if relevant)?

### Authorship

The approach your organisation takes to authorship depends on the resources you have available and the ambition you have for the policy. If you intend it to be short and simple, particularly for a statement, you may prefer to draft it internally. However, if you do not have in-house expertise and/or want to develop a best practice policy or detailed guidance, you may have to seek external support.

Members have taken different approaches to authoring their policies, including:

- Drafted internally – a statement can be drafted internally without disability inclusion expertise as it is often brief and general in nature. However, for a guidance document or policy, this is normally led by staff with disability inclusion experience.
- Drafted internally and sought support from a third party, such as an independent consultant, to conduct a technical review. This has helped ensure internal buy-in while also ensuring alignment with the CRPD and other international commitments, DFAT and ANCP Accreditation requirements, and sector good practice.
- Drafted by a third party, such as an Independent Consultant, who led and guided the organisation through the process. There are many consultants doing this work.

### Workshops

To promote deep engagement among staff in the drafting of the policy, the awareness raising session mentioned in the previous section can be followed by a workshop to unpack:

- Why disability inclusion is important for your organisation;
- How disability inclusion aligns with the organisation’s vision, mission, and programming approach; and

- What commitment/s you would like to make as an organisation

The above workshop could then be built out to a “writeshop” where stakeholders work through the content of the policy heading-by-heading in a workshop format. This would help establish buy-in amongst staff which is critical for implementation.

### Drafting the policy content

This stage will depend on whether you are developing a statement, guidance document, or policy as defined earlier in this document.

You may also choose to combine a policy and guidance document (or strategy, action plan, procedures, or standard), as several members have done.

Please refer to the [Key Elements of a Disability Inclusion Policy](#) section for sample content and phrasing.

### Seeking feedback on the policy

The format of the consultation will differ depending on the size of your organisation, how extensive you want to consult, and resources available to support the process.

Generally, the policy, which is often predominately developed in headquarters, is shared with staff and partners in other offices through email for feedback. It can also be shared with a technical expert, such as an Independent Consultant or advisory group, as several members have chosen to do (please see box below). Additional consultations and workshops can be held in-country, if appropriate, to ensure the policy is feasible across different contexts.

#### BOX 12: TIP – SEEKING FEEDBACK ON THE POLICY

When seeking feedback on the policy, best practice is to share the policy in multiple formats to promote disability inclusion principles and staff engagement. For example:

- Email the policy for written feedback.
- Share the draft policy via Sharepoint, Google Docs or a similar platform so people can add comments and work on the same document at the same time. This can help with consolidating feedback.
- Organise group webinars/meetings to gain verbal feedback.
- Conduct one-on-one consultations with individuals where that is requested and/or more appropriate. For example, with staff with disabilities who may not want to raise their concerns in front of a group, with technical experts, or with key leaders in your organisation who are critical for getting the policy endorsed and implemented.

#### 4. ENDORSEMENT BY GOVERNING BODY

Policies are sometimes approved by Senior Management rather than a Governing Body, such as a Board.

However, it is critical the Governing Body endorses the policy for three reasons:

- The policy sets the organisation's direction and guides decision making so it is important the Governing Body is involved;
- The Governing Body is ultimately accountable for the implementation of policies so it is important they are aware of and endorse the policy; and
- Gaining Governing Body endorsement demonstrates your organisation's commitment to taking its responsibilities seriously.

#### 5. COMMUNICATING THE POLICY

Once endorsed, the policy should be communicated in multiple formats in line with disability inclusive communication principles and to engage stakeholders:

- **Emailed to all staff**, volunteers, and partners (as appropriate).
- **Saved on a share drive** for easy retrieval and accessibility.
- **Shared through a webinar** – to discuss the key policy commitments and what this means for individuals and/or teams. This can then inform team operational plans and individual work plans.
- **Discussed with partners one-on-one** – this can help understand partner needs and how your organisation will either support them to develop their own policy of an equivalent standard or implement your policy. This is particularly important if you have, or are seeking, DFAT Full Accreditation. Please refer to the [Implementing the Policy](#) section below.
- **Included in induction materials** to ensure new staff and volunteers are aware of the organisation's commitments.
- **Uploaded to organisational website** – to be transparent and publicly accountable to your donors and other stakeholders.

##### BOX 13: TIP – COMMUNICATING THE POLICY ON YOUR WEBSITE.

Make sure the policy on your website is the latest version and there is a process in place to update the website when the policy is updated.

#### 6. IMPLEMENTING THE POLICY

To implement the policy, it is important to:

- Develop supporting documentation to guide the shift from policy to practice;
- Implement disability inclusive practices at the corporate organisational level, including through recruitment processes and reasonable accommodation;
- Implement disability inclusive practices in your programming; and
- Implement accessible communications throughout all of your work, including fundraising and marketing.

##### Develop supporting documentation

The policy should be supported by a guidance document, strategy, action plan, procedures, and/or standards depending on your organisation. A policy can be combined with a strategy or guidance document. Whether it is combined or separate, it is important for your organisation to have clarity on the how the policy will be translated from policy to practice.

This supporting document should consider:

- What is the current external and internal context related to disability inclusion? This could include some key statistics, references to the CRPD, and other pertinent commitments and agreements.
- What are your organisation's key strategies or key performance indicators and how does disability inclusion align with this?
- What is your organisation's strategic objectives and priorities for a defined period in relation to disability inclusion? What specific actions will your organisation take, by when, by whom, and how will this be measured? **Note:** ensure corporate organisational level actions are included as well as programming, fundraising, and communication actions.
- What are your organisation's minimum standards for disability inclusive practice? What procedures are in place, or will be put in place, to ensure disability inclusive practice?
- How will the priorities and targets be achieved? What approaches will be employed? With what financial and technical resources?
- Who is responsible and accountable for implementing the policy? Who is responsible and accountable for monitoring practice within the organisation and with partners? **Note:** This latter point is critical for DFAT Full Accreditation.

- When will the strategy be reviewed and adjusted (as needed) to ensure continued alignment with the policy?

Other organisational policies and procedures should also integrate disability inclusive approaches and cross-reference each other where appropriate. For example, in relation a Reconciliation Action Plan, protection from sexual harassment, exploitation and abuse, child protection, and whistleblowing policies, and grievance mechanisms. Please refer to separate ACFID guidance on different thematic topics.

### Implement disability inclusive practice at the organisational level

As duty bearers committed to the CRPD, organisations should implement disability inclusive practices at the organisational level and be disability confident employers. It is critical that your organisation promotes an anti-discrimination culture.

Furthermore, modelling disability inclusive practice is important as an end in itself to fully include possible recruits, employees, donors, members of the public, and project participants. It is also important to be authentic in engaging with partners and participants at the program level.

#### BOX 14: RESOURCE – HOW TO BE A DISABILITY CONFIDENT EMPLOYER

Inclusive Futures' Disability Confident Employers Toolkit provides a portfolio of practical guides, checklists, case studies, and resources which make it easier for any employer to be 'disability confident.' For further information, visit the [Inclusive Futures website](#)

As DFAT commissioned research<sup>xvii</sup> found, there are four organisational-level practices which are key drivers of disability inclusive practice in NGOs: whole of organisation approach, professional development, leadership, and recruitment. Please refer to Box 15.

#### BOX 15: RESEARCH – DRIVERS OF DISABILITY INCLUSIVE PRACTICE OF NGOS

In 2014, DFAT-commissioned research on disability practice of Australian NGOs made the following recommendations:

- **Whole of organisation approach** – Address disability inclusion across all operations to ensure workplaces are inclusive and accessible to all;
- **Professional development** – Provide training in disability awareness and disability inclusive programming for staff;
- **Leadership** – Encourage senior leadership support and attract appropriately skilled people with a disability to serve on Boards; and
- **Recruitment** – Build skills and confidence of HR managers and wider staff to recruit and support, train, and mentor appropriately skilled people with disability as staff and volunteers.

In relation to recruitment, simple modifications and adaptations can enable persons with disabilities to work in your organisation. This is known as reasonable accommodation.

There are three types of reasonable accommodation in terms of employment:

- **Changes to the job application process:** For example, ensuring advertisements are in accessible formats (see box below), stating that you welcome applications from persons with disabilities, advertising with your local disability networks (in addition to standard development networks), and adapting the interview process depending on the applicant's identified disability.

- **Changes to the work environment, or the way the job is usually done.** Besides making the workplace accessible, there may be other adjustments required, for example, in relation to equipment and the physical space, technology or adapting work hours. For persons with disabilities, it is important to ask how their individual needs can be met to enable them to perform their work effectively.
- **Changes that enable an employee with a disability to enjoy equal benefits and privileges** of employment, benefits and professional development as fellow co-workers: Persons with disabilities may get stuck in certain stereotyped roles for many years. In addition, some persons with disabilities may have low expectations and not seek out professional development or promotion opportunities due to fear of losing their job. It is therefore important to proactively consider this through formal professional development processes.

**BOX 16: RESOURCE – FINANCIAL AND OTHER SUPPORT FOR REASONABLE ACCOMMODATION, INCLUDING WORKPLACE ADJUSTMENTS**

There are many support options available to assist employers to implement appropriate disability related accommodations in the workplace. For example:

- The Australian Government’s Employment Assistance Fund, administered through the JobAccess initiative, provides financial help to buy work-related modifications, equipment, Auslan services, and workplace assistance and support services.  
<https://www.jobaccess.gov.au/employment-assistance-fund-eaf>
- JobAccess also offers an advice line and various tools to support the full participation of persons with disabilities in the workplace. For further information, visit:  
<https://www.jobaccess.gov.au/employers>
- A range of consultancy services are available to conduct access audits on buildings. You can also make accessibility a requirement when your organisation next negotiates the lease for your premises.

**Implement disability inclusive practice in programming.**

ACFID’s Compliance Indicators outline three other critical elements to support implementation in programming:

- **Consultation and analysis:** Consistent evidence of consultation with persons with disabilities and contextual analysis of the barriers to social inclusion and participation (see [Compliance Indicator 2.3.2](#)). In relation to consultation and contextual analysis, it is important to acknowledge that organisations cannot address the underlying causes of poverty and vulnerability in a particular context, without conducting a GEDSI analysis to understand the lived experience of diverse persons with disabilities.

Persons with disabilities are the world’s largest minority group so often, if persons with disabilities are not intentionally being considered and consulted in program analysis, they are likely being unintentionally excluded.

- **Meaningful participation and empowerment:** Consistent evidence of persons with disabilities and/or their representative organisations participating in decision-making about the initiatives that affect them (see [Compliance Indicator 2.3.3](#)).
- **Monitoring, Evaluation and Learning:** Consistent evidence of the assessment of progress in promoting empowerment of persons with disabilities (see [Compliance Indicator 2.3.4](#)).

As part of this, it is critical you collect disability-disaggregated data to understand the extent to which you are reaching the most marginalised in your programming and the extent to which your policy is being applied at the programming and organisational level. Through this monitoring, you can understand progress, but also if you are inadvertently doing harm or unintentionally excluding persons with disabilities.

To monitor disability inclusion, one option is to include the Washington Group Short-Set of Questions<sup>xviii</sup> in project baselines and endlines, or as part of activity-level service delivery. It is important to note that these questions have some limitations and are not the only tool you can use (see Box 17).

You can also add a couple of disability-related questions to a mid-term review and evaluation terms of reference and collect quantitative and qualitative information to understand the lived experiences of persons with disabilities as well as community and societal-level changes.

## BOX 17: RESOURCE – COLLECTING DISABILITY-DISAGGREGATED DATA

### Washington Group Short-Set of Questions

These questions are often promoted as the minimum standard to collect data on function and prevalence of disability. The United Nations also promotes the use of these questions in all national censuses and household surveys to provide internationally comparable disability data.

However, there are some limitations which need to be considered and mitigated in collecting disability-disaggregated data. The questions:

- Do not include people with psychosocial disabilities;
- Do not measure inclusion;
- Do not measure how meaningful participation is; and
- Do not monitor societal level changes around barriers.

Additional information would be required to monitor inclusion related to the removal of barriers in line with a rights-based approach.

### Rapid Assessment of Disability

The Rapid Assessment of Disability is a survey tool which has questions designed to measure and compare individuals' inclusion and participation across different domains. This can assist in identifying barriers to participation experienced by persons with disabilities as part of a baseline investigation and contribute to evaluation of the impact of programs.

For further information on collecting data and different options, please refer to Bush A., Carroll A. and James K., 2015, [Practice note: collecting and using data on disability to inform inclusive development](#).

In addition, the [Good Practice Indicators](#) highlight other important elements which should be in place to ensure successful implementation of the policy:

- **Disability inclusion focal person** to coordinate the implementation of the policy. Ideally, multiple champions should also be identified to support the disability inclusion agenda.
- **Integrate disability inclusion into other policies and strategies:** The policy's content and intent need to be integrated into other relevant organisational policies, strategies, and procedures, for example, human resources, anti-discrimination and harassment, program quality framework, among other documentation. This is key to supporting implementation of your organisation's intent and is necessary if your organisation has, or is seeking, DFAT Full Accreditation requirements.

- **Conduct contextual analysis and budget for disability inclusion activities in organisational and project budgets:** This includes for reasonable accommodations, awareness raising, and adapting project activities where needed to ensure activities are inclusive of different impairments.
- **Conduct training for key personnel and partners:** This should cover, at a minimum, an overview of disability inclusion issues and the rights articulated in the CRPD. Training should form part of the personnel induction, and refresher training should be conducted annually.
- **Participate in relevant sector forums** to learn about latest approaches, guidance, and learnings, for example, ADDC. Wherever your organisation is on the disability inclusion journey, share your learning with other organisations in the sector through platforms like ADDC. This helps promote continuous improvement in sector policy and practice.
- **Identify other opportunities to promote disability inclusion** relevant to your context and resources. For example, promoting disability inclusion on International Day of Persons with Disabilities (3 December), having a thematic reflection session on disability inclusion, or through an internal Gender and Diversity Week to celebrate disability inclusion and other forms of diversity.

For other good disability inclusive practices, please refer to the ACFID [Good Practice Guidance, DID4All](#) and other references in the [Resources section](#).

### NOTE ON DFAT ACCREDITATION

For Full Accreditation, it is critical your organisation undertake periodic assessments of your own and your implementing partners' disability inclusion practice. This includes the degree to which your policy is being implemented and the ongoing quality of policy and practice. Please refer to Criteria B3.7 of the DFAT ANCP Accreditation Manual for further details.<sup>xix</sup>

### Implement accessible communications

Accessible communications meet persons with disabilities' right to communicate freely and without barriers. Steps to meeting accessible communications include:

- Having your website compliant with [Web Content Accessibility Guidelines 2.2](#);
- Reviewing call centre operations, newsletters, mail-outs and other forms of communications to be accessible to persons with disabilities;
- Reviewing software settings and other information, communication and technology systems to ensure these are accessibility enabled. For example, in

Microsoft 365, you can review the Accessibility Checker before finalising documents. It does not pick up all accessibility concerns but is a useful start. [Microsoft Support](#) also provides some practical tips;

- Reviewing how your organisation’s events (including internal meetings and interviews, and external events and meetings) are run to be accessible to persons with disabilities; and
- When publishing documents online, include a Word version as well as a PDF to ensure people using screen readers can access the documents. Another option is to include an email address which persons with disabilities can contact if they need particular accessibility features.

For further information and guidance, please refer to [Inclusive Futures’ A Basic Guide to Accessible Communications](#)

## 7. REVIEWING THE POLICY

It is important to monitor the implementation of your policy and related strategy, procedures or other form of documentation which supports the policy.

You could develop a checklist to ensure all areas of your organisation, including partners, are implementing the policy and related strategy and/or procedures as intended.

The policy and associated documents should be periodically reviewed to ensure continued relevance, effectiveness and consistency with evolving global standards and best practice.



Provision of healthcare assessment and healthcare service to children with disabilities, Ponsetti Program, Vanuatu 2018. Photo: Darren James / Royal Australian College of Surgeons.

# Key Elements of a Disability Inclusion Policy

This section outlines the critical and optional elements of a disability inclusion policy, depending on your organisational context and your ambition.

This section also provides examples from members on what is an ACFID minimum standard, what is good practice, and what is required to meet DFAT Accreditation requirements.

Finally, it highlights the difference between ACFID Code of Conduct and DFAT Accreditation requirements.

The examples from members policies are for illustrative purposes only. It is recommended that you review a sample of peer policies and draft content relevant to your organisation.

This document predominately focuses on developing a policy, as compared with a statement or guidance. See Box 18.

## CRITICAL ELEMENTS

The critical elements of a policy are those which all members regardless of size should have. They are:

1. Policy Title
2. Introduction
3. Scope
4. Definition of Terms
5. Guiding Principles
6. Policy Commitments
7. Roles and Responsibilities
8. Monitoring and Review
9. Endorsement
10. Revision History

### BOX 18: TIP – STATEMENT AND GUIDANCE DOCUMENT

A statement, at its core, only needs to include the 'Policy Commitments' as noted under the 'Critical Elements' heading. Other key elements such as the 'Review Process' and 'Endorsement' would likely be part of a broader Diversity, Anti-Discrimination, or other form of policy, in which the statement is situated.

A guidance document includes similar content to a policy but provides further information and practical how-to advice on implementing policy commitments. This draws on various sectoral resources, including toolkits, case studies, and training manuals.

In some organisations, the guidance document may also be combined with a strategy, procedures, standards, or action plan which details how the disability inclusion policy will be implemented.

## 1. POLICY TITLE

To clarify your organisation's intent and for clear alignment with ACFID Code of Conduct and DFAT Accreditation requirements, it is important the title accurately reflects the type of document.

It is suggested to avoid phrases like "disability inclusion framework". If a document combines a policy and guidance, call it "disability inclusion policy and guidance".

## 2. INTRODUCTION

Some members provide detailed context in their introductions while others are brief. As a minimum, it is suggested that an introduction should always include the following:

- Brief overview of the organisation’s understanding of disability inclusion and why it is important. This could include a statistic or two.
- Organisational commitment to disability inclusion in broad terms. This includes how disability inclusion aligns with the organisational vision and mission, and values. Some members also highlight how disability inclusion links with key organisational strategies, such as a global program strategy.

### BOX 19: EXAMPLE – ANGLICAN BOARD OF MISSION

Part of the introduction and context to the Anglican Board of Mission’s Disability and Development Policy notes:

“ABM(AID) is strongly committed to the principle of inclusiveness in its community development and emergency response work, as explained in ABM(AID)’s Community Participation and Inclusivity Policy...

“People with disabilities are the largest and most disadvantaged minority in the world. They make up 15 per cent of the global population (about one billion people), with most extended families including someone with a disability.”

ABM(AID) recognises, therefore, that disability is a development issue and can be both a cause and consequence of poverty. ABM(AID) believes that extreme poverty will not be eradicated without considering the needs and rights of persons with disabilities...”

- Organisational commitment to international human rights instruments with reference to the CRPD as a minimum. Some members also clarify their commitment to the Sustainable Development Goals (SDGs), other international commitments and agreements such as the Incheon Strategy, and relevant Australian legislation.

### BOX 20: EXAMPLE – MOTIVATION AUSTRALIA

A part of the introduction to Motivation Australia’s Disability Inclusion Policy notes:

“Motivation Australia recognises the inherent worth and dignity of all people and acknowledges the rights of people with disability to participate in all aspects of social, economic and political life on an equal basis with others. Motivation Australia endorses and upholds the United Nations Convention on the Rights of Persons with Disability (CRPD).”

Motivation Australia goes on to note their commitment to DFAT’s Development for All Strategy, the Incheon Strategy, and Pacific Regional Framework for the Rights of Persons with Disabilities.

## 3. SCOPE

There are two types of scope which should be clarified in this section:

- The stakeholders to whom the policy applies, for example, staff, volunteers, interns, consultants, partners, Governing Body members; and
- The functions or departments of the organisation to which the policy applies, for example, programming, operations, fundraising. **Note:** policies should apply to all functions of your organisation to ensure you are modelling disability-inclusive practice and can be authentic in your engagement with partners and participants.

### NOTE ON DFAT ACCREDITATION

DFAT’s first disability inclusive development strategy was launched in 2008. Given this, for DFAT Full Accreditation, it is expected that organisations have had time to create and/or adapt policies and procedures across the organisation’s functions. It is also expected that organisations can demonstrate a track record of disability inclusion practice and progress across the organisation and with implementing partners. This is reflected in the DFAT Accreditation criteria B3.7.

## 4. DEFINITION OF TERMS

In any policy, it is important to define and/or describe the terms used. For a disability inclusion policy this includes describing 'disability' in line with the CRPD, as a minimum. As a reminder, Article 1 of the CRPD notes:

"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." (Article 1)

### BOX 21: EXAMPLE – SAVE THE CHILDREN AUSTRALIA

Save the Children Australia chose to add 'episodic' to the CRPD definition of disability in line with the evolving concept of disability referred to CRPD preamble. As they note:

"This is particularly important for humanitarian organisations who are more likely to be exposed to situations that may lead to episodic disabilities, such as mental health conditions."

Some organisations adapt the CRPD description to make it more relevant to their context. Please refer to the example above.

Other terms or phrases should be defined such as "disability inclusive development," "rights-based approach," "twin-track approach," or "reasonable accommodations".

## 5. GUIDING PRINCIPLES

Guiding principles clarify your organisation's underpinning beliefs and guide your approach to disability inclusion.

Principles vary between organisations as they are often closely related to organisational missions. Please refer to examples in the box below.

### BOX 22: EXAMPLES – PRINCIPLES

Examples of the different approaches to guiding principles include:

For faith-based members, their principles are often underpinned by their respective religious teachings. In some cases, there are also clear linkages to the disability inclusive development principles. For example, Caritas Australia's principles are: respect, participation, empowerment, equality, and subsidiarity (devolving power, decisions and responsibility to the lowest level at which they can be exercised).

For secular members, there is wide diversity in organisational approaches but generally their principles are linked to the disability inclusive development principles and/or broader human rights, equality, and social justice agendas. For example, Femili PNG's guiding principles are: human rights, awareness, participation, comprehensive accessibility, and twin-track approach.

For disability inclusive development focused organisations like CBM and Motivation Australia, their principles align closely with disability inclusive development principles as disability inclusion is a central focus of their organisations' respective missions.

## 6. POLICY COMMITMENTS

A policy commitment is a pledge to do something. It signals – internally and externally – your organisation’s intent, that the organisation understands what is expected in relation to disability inclusion, and that it takes its responsibilities seriously.

It can come in the form of a short statement within a broader policy as described in the box below.

### BOX 23: EXAMPLE – SEE BEYOND BORDERS

In See Beyond Borders’ Development Policy (2020), they note the following policy commitment:

“Actively identify opportunities for the support and promotion of vulnerable or marginalised members of the community, including women, people with a disability, indigenous or ethnic minorities and people living with HIV/ AIDS.”

However, often an organisation’s policy commitments are expressed in a series of statements covering a diverse range of organisational dimensions.

Typically, policy commitments stipulate your organisation’s:

- Position on, and priorities for, disability inclusive practice – including a human rights-based approach.
- Expectations of staff, volunteers, interns, Governing Body members, partners, and other relevant parties, in relation to disability inclusion.
- Intent to integrate disability inclusion across organisational policies, procedures, and activities.

### NOTE ON DFAT ACCREDITATION

It is important for all organisations, but especially those with or seeking DFAT Full Accreditation, that you outline not only your own commitment to disability inclusion, but also how you will support partners to implement disability inclusive practice.

For DFAT Full Accreditation, there must also be clear evidence that the disability inclusion policy is not a standalone document. The policy and its intent must be reflected throughout other organisational policies and procedures.

Furthermore, in the policy commitment, it is important to clarify where your organisation may diverge from the norm in relation to disability-inclusive principles. Your organisation working in a particular context may take a slightly different and/or tailored approach. To demonstrate compliance for DFAT Full Accreditation, it is important you document your position and have evidence why this approach has been adopted.

### BOX 24: EXAMPLE – ROYAL AUSTRALASIAN COLLEGE OF SURGEONS

In their Disability Inclusiveness Policy, the Royal Australasian College of Surgeons Global Health Program has the following policy commitments:

Recognise that for development to reach all, inequalities relating to disability must be addressed, and will therefore commit to promoting equal access and creating awareness, where appropriate and reasonable, for both men and women of differing abilities across RACS Global Health Programs;

Ensure that the design, implementation, monitoring and evaluation of RACS Global Health programs is guided by the principle that all people are equal and endowed with inalienable rights, which form the basis of a free and dignified existence;

Ensure that disability inclusion is addressed as a cross-cutting issue in all programs and projects;

Incorporate disability assessment (analysis of local context and barriers to full participation) into all situation analyses and consult OPD’s in this process;

Ensure project-level risk assessments consider the risks facing PWDs [persons with disabilities], especially children with a disability;

Ensure program designs and proposals are reviewed/appraised to ensure disability inclusion has been adequately addressed;

Use disability inclusive monitoring evaluation and learning approaches (including data disaggregation and information about barriers to inclusion); and

Ensure any advocacy agendas not only empower but also protect and include the most vulnerable in a community.

## 7. ROLES AND RESPONSIBILITIES

It is critical for accountability purposes that your organisation clarifies:

- Who is responsible for implementing the policy;
- How the policy will be monitored, including any feedback mechanisms; and
- At what intervals the policy will be formally reviewed.

In relation to the first point, this is often left as the Chief Executive Officer or a leadership sponsor, however best practice is to highlight everyone's role and responsibilities, as per the example in Box 25.

### BOX 25: EXAMPLE – CARITAS AUSTRALIA

In their Diversity, Equity and Inclusion Policy, Caritas Australia has the following on their review process:

"We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at a minimum every three years to ensure it is working in practice and updated to accommodate changes in legislation or circumstance.

"Feedback on this and other policies is openly encouraged. We use this feedback, as well as emerging good practice and collaborative lessons learnt across the development sector, to strengthen this and related policies and procedures."

They note the Head of People and Culture is the Document Owner. However, they also outline everyone's roles and responsibilities in implementing the policy including:

- The Board of Directors
- The Leadership Team
- The Chief Executive Officer
- Workplace Equity Committee
- Personnel

## 8. MONITORING AND REVIEW

When reviewing the policy, it is suggested you:

- Consult persons with disabilities about how the policy has been implemented and how it has impacted their experience engaging with your organisation. Persons with disabilities could be project participants, donors, members of staff or partner organisation, or members of the public who receive mail-outs, for example.
- Ask for feedback from other key stakeholders including staff and partners.
- Review the latest evidence on disability inclusion for example, reviewing [DID4All](#) and [ADDC](#).
- Review peer organisations' policies to see if there is anything you would like to integrate in your policy. This could be particularly useful if your organisation is interested in benchmarking yourself against your peers.

When updating the policy, for transparency and accountability, it is important to not only include the issue or effective date, but clarify the frequency of review, and when the next review is due. For example, please see Box 26.

### BOX 26: EXAMPLE – WATER AID

In their Equality and Inclusion Policy, WaterAid has the following document control table. This table provides a transparent and easy-to-access overview of the status of the policy, the version, and when the next review is due.

Document Title:	
Scope:	
Version:	Authors:
Responsibility:	
Date Approved:	Document Status:
Effective Date:	Approved By:
Superseded version:	Date of Review:

For smaller organisations who have few staff and/or nascent policy processes and procedures in place, it is good practice to outline the policy amendment process step-by-step to ensure a consistent approach. Please refer to an example below.

### BOX 27: EXAMPLE – FEMILI PNG

Femili PNG’s Disability Inclusion Policy notes:

“Any changes or amendments involve the following steps:

- Updating the Document Version table at the top of this page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual e.g. shared drives, website (if applicable);
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.”

## 9. ENDORSEMENT

This is a brief statement about who ratified, approved, or endorsed the policy for implementation. This should be the Governing Body as noted in the [Steps to Develop and Implement a Disability Inclusion Policy](#) section.

## 10. REVISION HISTORY

A revision history promotes transparency, supports communications of the changes, and is good knowledge management practice.

It is important the changes do not only say “update” but provide a summary of the specific changes made as per the example below.

### BOX 28: EXAMPLE – WORLD VISION

In their Disability Inclusion Policy, World has a ‘Revisions History’ table at the end of their policy which clarifies the changes made:

Revision Date	
Revision no.	
Summary Description of revision(s) made	
Section(s) change	
Approved by:	

### NOTE ON DFAT ACCREDITATION

The revision history also demonstrates how the organisation is evolving its approach over time. This is useful evidence for DFAT Full Accreditation which assesses the “ongoing quality” of policy and practice.

## OPTIONAL ELEMENTS

Other optional, but recommended, elements for a disability inclusion policy include:

### Standards, procedures, and guidelines related to the policy

A disability inclusion statement or policy is typically accompanied by, a strategy, guidance, procedures, standards, or action plan which provide more detailed operational and practical how-to advice on how to practice disability inclusion:

- **Strategy:** A strategy can sit above or below the policy depending on the document hierarchy in your organisation. However, for the purposes of this guidance, a strategy is a comprehensive plan on how the organisation's disability inclusion goals will be achieved, and policy commitments will be met.
- **Guidance:** As described earlier in the document, this provides information and practical how-to advice with links to practitioner resources and further reading for self-study. Compliance is often expected but normally voluntary.
- **Procedures:** This is a formal document or series of documents which outline the step-by-step process that is expected to be followed by all staff.
- **Standards:** Standards clarify the organisation's specific expectations of what is required as a minimum and are often monitored and reported on.
- **Action plan:** This is typically in the form of a table or matrix which outlines the objectives, key actions or tasks, who is responsible, and when the task is due. The action plan can then inform annual operating plans for the organisation and team, and individual work plans to ensure follow-up.

### NOTE ON DFAT ACCREDITATION

Having a policy and clear standards on what disability inclusion looks like in your organisational context, along with periodic assessments of how this has been implemented, is critical for DFAT Full Accreditation.

### BOX 29: EXAMPLE - WATERAID

In their Equality and Inclusion Policy, WaterAid notes:

"WaterAid's framework: Equity and Inclusion: A rights-based approach (2010) sets out the minimum standards across four strategic aims at the global, regional and national levels. WaterAid Australia's 'Women's Empowerment and Gender Transformative' framework (2017) sets out key principles and practice guidance to country programs and partners to specifically address gender and power through WASH."

## PARTNERSHIPS

Several members have explicit sections on their commitment and approach to partnership. This is good practice and is in line with the intent of SDG 17 on partnership. For an example, please see Box 30.

### BOX 30: EXAMPLE – FRED HOLLOW'S FOUNDATION

In their Human Rights, Gender Equity and Disability Inclusion Policy, the Fred Hollows Foundation outlines their commitment to partnership, which in part is:

"...The Foundation's approach is to positively influence through our work and in partnership with agencies that support The Foundation's vision and employs a process of due diligence to ensure that appropriate partnerships are entered into. The Foundation recognises and encourages communication, transparency and accountability between partners as vital to ensuring that Human Rights are respected and protected within the programs supported by The Foundation and more broadly within the countries where we work. *All potential partners should have written policies, or a willingness to progress towards developing policies, on aspects of practice including Human Rights and Inclusive Practices (e.g. Gender and Disability).*" (Italics highlights are author's emphasis)

#### NOTE ON DFAT ACCREDITATION

For Full Accreditation, under indicator B3.7, DFAT requires NGOs to undertake periodic assessment of its own and implementing partners' disability inclusion practice, including the degree to which its policy is being implemented and the ongoing quality of its policy and practice.

A partnerships section should therefore be considered mandatory, or at least the content included elsewhere in the policy, for organisations who have are seeking DFAT Full Accreditation.

#### Communication

Depending on the scope of your policy and whether it applies to the whole organisation, it is good practice to include a communication section or the intent of this in the "Policy Commitments." Two examples are provided below.

#### BOX 31: EXAMPLES – COMMUNICATION

Two examples on how to include Communication in your policy are outlined below:

Anglican Board of Mission: "Photographs used by ABM to promote its work will portray Persons with Disabilities with dignity and respect (see ABM Communications Manual)."

Motivation Australia: "To promote disability inclusive development in our programmes, we will protect the dignity and privacy of people with disabilities (see also privacy policy & ethical use of images and stories policy). Within our organisation, we will ensure that all communication materials – electronic or otherwise – are accessible to people with disabilities to the extent possible."

#### Relevant policies

This is normally a simple bullet-point list of organisational policies, and a list of international commitments and frameworks (such as the CRPD), and Australian legislation that your organisation is committed to. For organisations with a single country focus, this may also include reference to legislation, strategies, or programs in a particular country context.

In relation to internal policies, this list will likely inform which policies may need to be reviewed and amended to ensure the intent of the disability inclusion policy is reflected.



This is Kyalo Kavaso showing his harvested mung beans. Kyalo is a member of Wendano wa Kyua Group in Machakos County in Kenya, comprising people with disabilities, which is part of a bigger livelihood improvement project. He says, "I now feel included in development. In our group we are able to discuss issues affecting us and get ideas on how to handle issues from each other". Photo: Anglican Board of Mission (Australia).

# Resources

## SECTORAL RESOURCES

Name	Description
ACFID Code of Conduct, Good Practice Toolkit, <a href="#">Commitment 2.3</a>	This outlines ACFID's requirements in relation to disability inclusion including the Commitments, Verifiers, Good Practice Indicators and other resources.
<a href="#">Australian Disability and Development Consortium</a>	ADDC is an Australian based, international network focusing attention, expertise and action on disability issues in developing countries; building on a human rights platform for disability advocacy. The website includes access to their bulletin, news and events, networking opportunities, resources.
Australian Government Department of Foreign Affairs and Trade, 2018, <a href="#">Australian NGO Accreditation Guidance Manual</a>	This manual detail the requirements for all Australian NGOs to meet DFAT Full and Base Accreditation.
Australian Government Department of Foreign Affairs and Trade, 2015, <a href="#">Development for All 2015-2020: Strategy for strengthening disability inclusive development in Australia's aid program</a>	The Development for All Strategy (2015-2020) outlines the Australian aid program's approach, principles, and priorities as they relate to disability inclusive development. Note: this has been extended to 2021.
Australian Government Department of Social Services, <a href="#">'Job Access'</a>	<p>Job Access is the national hub for workplace and employment information for people with disability, employers, and service providers.</p> <p>Created by the Australian Government, it brings together the information and resources that can 'drive disability employment', including an Employer Toolkit.</p> <p>It also provides links to other resources including the Employment Assistance Fund to support workplace modifications, and a telephone advice line among other resources.</p>
Australian Government Department of Social Services, <a href="#">'A New Disability Strategy'</a>	This website provides the latest information on the National Disability Strategy. As of March 2021, the National Disability Strategy was due to renewal.
Brown, S., and Scott-Parker, S., 2020, <a href="#">The disability-confident employers' toolkit</a> . Haywards Heath: Inclusive Futures,	A portfolio of practical guides, checklists, case studies and resources which make it easier for any employer to be 'disability confident'.
Bush A., Carroll A. and James K., 2015, <a href="#">Practice note: collecting and using data on disability to inform inclusive development</a> , Plan	This practice note provides useful guidance about data collection as a component of disability inclusive practice, and prompts agencies to consider how this can be integrated into a comprehensive organisational and programmatic approach to disability inclusion.

International Australia, CBM, and Nossal Institute for Global Health	
CBM, 2019, <a href="#">Disability and Gender Analysis Toolkit</a>	This toolkit steps through the process of planning and conducting a disability and gender analysis at different levels. It provides helpful tools to support this process including an individual self-assessment for staff and partners, an organisational assessment, and program/project assessment tools.
CBM, 2015, <a href="#">Disability Inclusive Development Toolkit</a>	This manual primarily targets CBM staff and partners, however, it also provides useful tips and resources for others. It includes a wide range of materials including but not limited to: facts and figures about disability; disability inclusive development principles; inclusive recruitment, retention and promotion of staff; managing change processes; and guidance on training and facilitation.
CBM, 2014, <a href="#">Australian NGO Cooperation Project: Research Project</a> (An analysis of ANCP partner organisations' engagement on disability inclusion and recommendations for future progress)	This 2014 research investigates the key drivers for disability inclusive practice among Australian ANCP NGOs.
CBM, 2012, <a href="#">Inclusion Made Easy Guide</a>	Some of the legislative and sectoral guidance has been superseded and, as of March 2021, CBM is working on a new version. However, in the meantime, it is an easy-to-use resource with background on why disability is relevant to the development sector, guiding principles, and how to put disability into practice in the project cycle and organisationally. For organisations starting out on the disability-inclusion journey, it remains one of the most practical and accessible resources.  It provides a number of checklists relating to accessible communications and various thematic areas including: advocacy, child protection, education, environment, health, HIV/AIDs, livelihoods, WASH, and gender equality.
DID4All, <a href="#">Disability Inclusive Development Resource</a>	DID4All has a wealth of disability inclusive development resources including many of the resources listed here.
<a href="#">End the Cycle</a> , an initiative of CBM	End the Cycle provides a range of downloadable resources which can be used in all sorts of activities and programs to powerfully portray the cycle of poverty of disability. This includes videos, case studies, and fact sheets.
<a href="#">First Peoples Disability Network</a>	FPDN is a national organisation of and for Australia's First Peoples with disability, their families and communities. The organisation is governed by First People with lived experience of disability
<a href="#">Global Action on Disability (GLAD) Network</a>	GLAD is a coordination body of bilateral and multilateral donors and agencies, the private sector and foundations working to enhance the inclusion of persons with disabilities in international development and humanitarian action.
<a href="#">Maven, Scope Global</a>	Maven is Scope Global's in-house disability and inclusion service which seeks to break down barriers while creating employment opportunities for persons with disability. Maven provides disability awareness training, accessibility reviews and recommendations, Disability Access and Inclusion Plans, and communities of practice.

<p><a href="#">Rapid Assessment of Disability</a>, Nossal Institute of Health, University of Melbourne</p>	<p>The Rapid Assessment of Disability is a survey tool which has questions designed to measure and compare individuals' inclusion and participation across different domains. This can assist in identifying barriers to participation experienced by persons with disabilities as part of a baseline investigation and contribute to evaluation of the impact of programs.</p>
<p>The Scottish Human Rights Commission, '<a href="#">Taking a Human Rights Based Approach</a>'</p>	<p>This website lists out the PANEL principles which underpin the HRBA.</p>
<p>United Nations Office of the High Commission for Human Rights, '<a href="#">SDG-CRPD Resource Package</a>'</p>	<p>This is a comprehensive resource with high-level policy guidelines across all the SDGs and thematic briefs on: hunger, water and sanitation; climate action; decent work, economic growth, and sustainable cities; industry, innovation, infrastructure, and partnerships.</p>
<p>Washington Group on Disability Statistics, <a href="#">Short Set of Questions on Disability</a></p>	<p>The recommended Short Set of Questions are often used by Australian NGOs to understand the impairments in a particular context, support disability-disaggregated data, and to inform programming. This is also promoted by DFAT. <u>Note:</u> this is not the only tool to assess the prevalence of disability. Please refer to <a href="#">DID4All</a> and other resources.</p>
<p><a href="#">Web Content Accessibility Guidelines 2.2</a></p>	<p>This covers a wide range of recommendations for making web content more accessible. Following these guidelines will make content more accessible to a wider range of persons with disabilities, including accommodations for blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these, and some accommodation for learning disabilities and cognitive limitations.</p>

## AUSTRALIAN LEGISLATION, REGULATORY FRAMEWORK, AND RESOURCES

### Legislation

- Age Discrimination Act 2004 (Cth), <https://www.legislation.gov.au/Details/C2020C00283>
- Australian Human Rights Commission Act 1986 (Cth), <https://www.legislation.gov.au/Details/C2019C00030>
- Disability Discrimination Act 1992 (Cth), <https://www.legislation.gov.au/Details/C2018C00125>
- Equal Opportunity Act 2010 (Victoria), <https://www.legislation.vic.gov.au/in-force/acts/equal-opportunity-act-2010/020>
- Fair Work Act 2009 (Cth), <https://www.legislation.gov.au/Details/C2020C00393>
- Racial Discrimination Act 1975 (Cth), <https://www.legislation.gov.au/Details/C2016C00089>
- Sex Discrimination Act 1984 (Cth), <https://www.legislation.gov.au/Details/C2018C00499>

### Standards

- Australian Government, 'Disability (Access to Premises – Buildings) Standards 2010,' compiled 30 September 2020, <https://www.legislation.gov.au/Details/F2020C00976>, accessed 10 January 2021 - The Standards seek to ensure that persons with disabilities in Australia have dignified, equitable, cost-effective, and reasonable access to buildings, facilities, and services.

## INTERNATIONAL LAW AND COMMITMENTS

Name	Description
Association of Southeast Asian Nations, 2018, <a href="#">ASEAN Enabling Masterplan 2025: Mainstreaming the Rights of Persons with Disabilities</a>	This seeks to concretise the ASEAN Community Vision 2025 in mainstreaming the rights of persons with disabilities and fosters Member States' commitment towards an inclusive community.
Pacific Islands Forum, 2016, <a href="#">Pacific Framework for the Rights of Persons with Disabilities 2016 – 2025</a> : A regional framework to support national government actions on inclusive development for the rights of persons with disabilities	The purpose of the PFRPD is to support Pacific governments to promote, protect and fulfil the rights of persons with disabilities as outlined in the CRPD; and provide a regional modality to strengthen coordination and collaboration in support of national initiatives.
<a href="#">United Nations Convention on the Rights of Persons with Disabilities</a> as adopted on 13 December 2006 and entering into force on 3 May 2008	The CRPD is the key reference document which articulates the rights of persons with disability and underpins disability-inclusive development.
United Nations, 2015, Transforming Our World: the 2030 Agenda on Sustainable Development, A/RES/70/1, <a href="#">Resolution adopted by the General Assembly on 25 September 2015</a>	This is the full legal text of the Sustainable Development Goals.
United Nations, 2015, <a href="#">Disability Inclusive Sustainable Development Goals</a> : 2030 Agenda for Sustainable Development	This infographic shows how disability inclusion is incorporated into the SDGs
United Nations Department of Economic and Social Affairs, no date, <a href="#">The 17 Goals</a>	This is a more accessible version of the SDGs with associated guidelines and resources.
United Nations Economic and Social Commission for Asia and the Pacific, 2012, <a href="#">Incheon Strategy to “Make the Right Real” for Persons with Disabilities in Asia and the Pacific</a>	The Incheon Strategy was the first set of regionally agreed disability-inclusive development goals. The Strategy outlines the goals and targets for the Asian and Pacific Decade of Persons with Disabilities for the period 2013 to 2022.
<a href="#">United Nations Office of the High Commissioner for Human Rights</a> , home page	This link will take you to the home page. Go to the 'Human Rights by Country' menu tab, insert a country and then you have access to all the State reports for CRPD and other conventions.
United Nations Office of the High Commissioner for Human Rights, <a href="#">Documentation by Country</a>	Universal Periodic Review reports of different countries can be found on this website. These reports provide useful context for disability analyses.

<p>United Nations Office of the High Commissioner for Human Rights, <a href="#">‘Annual thematic reports of the Special Rapporteur on the rights of persons with disabilities’</a></p>	<p>This resource provides more detail around various articles or themes of the CRPD, including disability inclusive development.</p>
<p>United Nations Office of the High Commissioner for Human Rights, <a href="#">‘Committee on the Rights of Persons with Disabilities – General Comments’</a></p>	<p>This resource includes General Comments from the Committee on the Rights of Persons with Disabilities in relation to the CRPD.</p>
<p><a href="#">United Nations Sendai Framework for Disaster Risk Reduction 2015 – 2030</a> as adopted by the Third United Nations World Conference on Disaster Risk Reduction in March 2015</p>	<p>The Sendai Framework is a global agreement to reduce and prevent disaster risks. It recognises that persons with disabilities and their organisations have a critical role to play at all stages of disaster risk reduction planning and requires all disaster risk reduction policies to integrate a disability perspective.</p>



Femili PNG outreach at the Disability home at the Papuan Compound in Lae, December 2020.  
 Photo: Jonica Jay / Femili PNG.

# Annex 1: Mapping ACFID and DFAT Accreditation Requirements (March 2021)

	ACFID		DFAT ACCREDITATION	
	COMPLIANCE INDICATORS	GOOD PRACTICE INDICATORS	BASE ACCREDITATION	FULL ACCREDITATION
<b>ORGANISATIONAL COMMITMENT</b>	<p>2.3.1 Members demonstrate an organisational commitment to the inclusion of people with disabilities.</p> <p>Verifier: Policy, statement or guideline document that commits the Member to the inclusion of people with disabilities.</p>	<p>Disability inclusion focal person in place.</p> <p>Training for key personnel and partners which covers disability inclusion issues and the rights articulated in the UN Convention on the Rights of Persons with Disabilities (CRPD) is provided.</p> <p>The principles of disability inclusivity are promoted in communications with the public/external stakeholders</p>	<p>A formal documented organisational commitment is not required – but is good practice given criteria B3.2 below.</p>	<p>B3.7 ANGO has a Disability Inclusion Policy and undertakes periodic assessments of its own and its implementing partners’ disability inclusion practice.</p> <p>ANGOs seeking Full accreditation should have a formal policy and procedures outlining its approach to promoting disability inclusive practice...</p>
<b>CONSULTATION AND CONTEXTUAL ANALYSIS</b>	<p>2.3.2 Members’ planning process includes consultation with people with disabilities and contextual analysis of the barriers to social inclusion and participation.</p>	<p>Activities that build the capacities of disabled people’s organisations (and other groups with disabilities) to advocate for the fulfilment of the rights articulated in the CRPD are supported.</p>	<p>B3.2 Australian NGO (ANGO) incorporates disability inclusive practices including contextual analysis of barriers for people with disability, opportunities to enable inclusion and targeted M&amp;E.</p> <p>ANGO should be able to demonstrate that it incorporates measures to understand the barriers to inclusion, and to promote disability inclusive practices throughout its programs. This includes</p>	

Verifier: Design or planning framework, tools, templates which require or approaches which consistently show evidence of consultation with people with disabilities and contextual analysis of the barriers to social inclusion and participation.

undertaking analysis which includes consultation with people with disability and contextual analysis of the barriers to social inclusion and participation. Findings from this analysis should be used to ensure at minimum that the initiative/program does no harm and does not reinforce inequalities and barriers to inclusion and that program designs promote inclusion of people with disability...

## PARTICIPATION

2.3.3 Members promote opportunities for people with disabilities and/or their representative organisations to participate in decision-making.

Verifier: Development and humanitarian initiatives consistently show evidence of people with disabilities and/or their representative organisations participating in decision-making about the initiatives that affect them.

Activities focused on the promotion of rights and inclusion of people with disabilities are supported.

B3.2 Australian NGO (ANGO) incorporates disability inclusive practices including contextual analysis of barriers for people with disability, opportunities to enable inclusion and targeted M&E.

... Monitoring and evaluation should demonstrate the assessment of progress in promoting the inclusion of people with disability.

B3.7 ANGO has a Disability Inclusion Policy and undertakes periodic assessments of its own and its implementing partners' disability inclusion practice.

... ANGOs should also undertake periodic assessments (perhaps every 3 years or so depending on the nature of the partner and program) of its own and its implementing partners' disability inclusion practice, including the degree to which its policy is being implemented and the ongoing quality of its policy and practices. This will strengthen the systematic nature, rigour, and quality with which the related indicator for Base and Full accreditation is implemented and monitored. The frequency of the assessments should be determined by the ANGO based on risk and other variables rather than prescribed by DFAT however it would be prudent to ensure assessments have been undertaken prior to accreditation.

**MONITORING AND EVALUATION**

2.3.4 Members monitor and evaluate their progress in promoting the empowerment of people with disabilities.

N/A

B3.2 as above

B3.7 as above.

Verifier: Monitoring and evaluation framework, tools, templates which require or approaches which consistently show evidence of the assessment of progress in promoting empowerment of people with disabilities.

---

# Annex 2: Human Right-Based Approach and the PANEL Principles

One way of understanding a human rights-based approach is to see our role as:

- Helping to build the ability of rights-holders to claim their rights; and
- Helping to build the capacity of duty bearers to fulfil the rights of their citizens.

A human rights approach will vary depending on the nature of the organisation concerned and the issues it deals with. Common principles, however, have been identified as the "PANEL" principles. The summary of these principles below is adapted from materials from the Scottish Human Rights Commission<sup>xx</sup>.

<b>P</b>	<b>PARTICIPATION</b>	Everyone has the right to participate in decisions that affect their human rights. Participation must be active, free, meaningful and give attention to issues of accessibility, including access to information in a form and a language which can be understood.
<b>A</b>	<b>ACCOUNTABILITY</b>	Accountability requires effective monitoring of human rights standards and effective remedies for human rights breaches. For accountability to be effective there must be appropriate laws, policies, institutions, administrative procedures, and mechanisms of redress in order to secure human rights.
<b>N</b>	<b>NON-DISCRIMINATION AND EQUALITY</b>	A HRBA means that all forms of discrimination in the realisation of rights must be prohibited, prevented and eliminated. It also requires the prioritisation of those in the most marginalised or vulnerable situations who face the biggest barriers to realising their rights.
<b>E</b>	<b>EMPOWERMENT OF RIGHTS HOLDERS</b>	Individuals and communities should understand their rights and be fully supported to participate in the development of policy and practices which affect their lives. Individuals and communities should be able to claim their rights.
<b>L</b>	<b>LEGALITY</b>	A HRBA requires the recognition of rights as legally enforceable entitlements and is linked to national and international human rights law.

Figure 4: The Panel Principles

# Acknowledgements

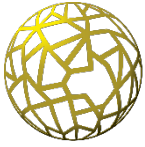
This guidance was prepared for ACFID by Teman Consulting. In its development, consultation was undertaken with a number of relevant stakeholders, including ACFID members, the Department of Foreign Affairs and Trade, the Australian Disability and Development Consortium, Organisations of Persons with Disabilities, and independent consultants.

Ului of Samoa is supported by her family and local service staff to practice using her new prosthesis outside her home. Photo: Motivation Australia.



# Endnotes

- <sup>i</sup> United Nations Convention on the Rights of Persons with Disabilities, 2006, accessed 6 January 2021, <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-32-international-cooperation.html>
- <sup>ii</sup> DFAT, 2015, Development for All 2015-2020: Strategy for strengthening disability inclusive development in Australia's aid program, <https://www.dfat.gov.au/about-us/publications/Pages/development-for-all-2015-2020>.
- <sup>iii</sup> DFAT, 2018, Australian NGO Accreditation Guidance Manual, <https://www.dfat.gov.au/sites/default/files/accreditation-guidance-manual-final.pdf>
- <sup>iv</sup> CBM, 2015, Disability Inclusive Development Toolkit, <https://www.cbmun.org.uk/wp-content/uploads/2016/05/CBM-DID-TOOLKIT-accessible.pdf>, page 13
- <sup>v</sup> CBM, 2012, Inclusion Made Easy Guide, [https://www.cbm.org/fileadmin/user\\_upload/Publications/cbm\\_inclusion\\_made\\_easy\\_a\\_quick\\_guide\\_to\\_disability\\_in\\_development.pdf](https://www.cbm.org/fileadmin/user_upload/Publications/cbm_inclusion_made_easy_a_quick_guide_to_disability_in_development.pdf)
- <sup>vi</sup> Lesbian, Gay, Bisexual, Trans, Queer, Intersex
- <sup>vii</sup> CBM, 2015, Disability Inclusive Development Toolkit, <https://www.cbmun.org.uk/wp-content/uploads/2016/05/CBM-DID-TOOLKIT-accessible.pdf>, page 13
- <sup>viii</sup> The Scottish Human Rights Commission, 'Taking a Human Rights Based Approach,' <http://eqhria.scottishhumanrights.com/eqhriatraininghrbaexplained.html>, accessed 4 March 2021
- <sup>ix</sup> Note: this guidance promote equality between people of all genders. The binary phrasing is retained in the text as it is directly referencing the CRPD which refers to the binary.
- <sup>x</sup> For example, Astbury, J. and Walji, F. Triple Jeopardy: Gender-based violence and human rights violations experienced by women with disabilities in Cambodia, AusAID Research Working Paper 1, International Women's Development Agency, [https://iwda.org.au/assets/files/20130204\\_TripleJeopardyReport.pdf](https://iwda.org.au/assets/files/20130204_TripleJeopardyReport.pdf)
- <sup>xi</sup> First Peoples Disability Network, 2019, Policy Platform Federal Election 2019, accessed 4 March 2021, [https://fpdn.org.au/wp-content/uploads/2019/02/Policy-Platform-Federal-Election-2019\\_3.pdf](https://fpdn.org.au/wp-content/uploads/2019/02/Policy-Platform-Federal-Election-2019_3.pdf)
- <sup>xii</sup> For further information, please refer to CBM, Disability Inclusive Development Toolkit, 2015, <https://www.cbmun.org.uk/wp-content/uploads/2016/05/CBM-DID-TOOLKIT-accessible.pdf>
- <sup>xiii</sup> CBM, 2015, Disability Inclusive Development Toolkit, <https://www.cbmun.org.uk/wp-content/uploads/2016/05/CBM-DID-TOOLKIT-accessible.pdf>, page 13
- <sup>xiv</sup> *ibid*, page 54
- <sup>xv</sup> Australian Department of Social Services: <https://www.dss.gov.au/disability-and-carers/a-new-national-disability-strategy>
- <sup>xvi</sup> Web Content Accessibility Guidelines 2.2, accessed 10 January 2021, <https://www.w3.org/TR/WCAG22/>
- <sup>xvii</sup> CBM, 2014, 'Australian NGO Cooperation Project: Research Project (An analysis of ANCP partner organisations' engagement on disability inclusion and recommendations for future progress),' accessed 16<sup>th</sup> January 2021, [https://acfid.asn.au/sites/site.acfid/files/resource\\_document/ANCP-Research-Project.pdf](https://acfid.asn.au/sites/site.acfid/files/resource_document/ANCP-Research-Project.pdf)
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- <sup>xix</sup> DFAT, 2018
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**Cover photo:** Posenai, a prosthetist orthotist for the National Health Service in Samoa, builds a custom transfemoral prosthesis. Photo: Motivation Australia

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