

Disability Inclusion Helpdesk Report No: 88

Query title	Disability Inclusion in the work of International Financial Institutions
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Query	1. What strategic focus do international financial institutions (IFIs) have on disability inclusion and how does this measure up against evidence and best practice? 2. How does the work of IFIs on disability inclusion relate to FCDO's Disability Strategy? 3. What opportunities are there to strengthen the work of IFIs on disability inclusion?
Enquirer	International Finance Department

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Overview and background

This paper compares disability inclusion policies of a selected number of International Finance Institutions (IFIs).

The purpose is to provide an overview of publicly available information on approaches to Disability Inclusion (DI), compared against the The Foreign, Commonwealth & Development Office (FCDO)'s Disability Inclusion and Rights Strategy 2022-2030 ([FCDO, 2022](#)).

The following institutions have been prioritised for this review:

- > World Bank
- > Asian Development Bank (ADB)
- > African Development Bank (AfDB)
- > European Bank for Reconstruction and Development (EBRD)
- > International Finance Corporation (IFC)
- > International Monetary Fund (IMF)

The paper seeks to answer three questions specifically:

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1. What strategic focus do international financial institutions (IFIs) have on disability inclusion and how does this measure up against evidence and best practice?
2. How does the work of IFIs on disability inclusion relate to FCDO's Disability Strategy?
3. What opportunities are there to strengthen the work of IFIs on disability inclusion?

For Question 1, which considers the strategic focus of IFIs, a set of simple criteria has been developed to assess each institution's approach to DI, as follows:

- > Does the IFI have a specific disability inclusion strategy?
- > If so, for how long have they had a dedicated strategy?
- > Does their literature and strategy reflect a rights-based¹ approach?
- > To what extent does the IFI focus on mainstreaming disability inclusion in its wider support or programming?
- > To what extent is data disaggregated in programmes, reports and statistics, including through the use of the Washington Group Questions?²

For question 2, the paper explores how the work of IFIs on disability inclusion relates to the priority intervention areas under the [FCDO's Disability Inclusion and Rights Strategy](#); Universal human rights, freedom and democracy, Inclusive education, Inclusive health, Inclusive social protection, Inclusive economic empowerment, Inclusive humanitarian action and Climate action. The section looks at whether each institution addressed priority areas directly (i.e. through a disability inclusion strategy or investments) or indirectly through a broader policy in inclusion.³

In response to question 3, the report closes with recommendations for fostering greater disability inclusion across the work of IFIs, focusing on the World Bank as a key partner.

Defining disability

People with disabilities are: '...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, [UN Convention on the Rights of Persons with Disabilities](#))

Impairments (e.g. physical, cognitive or sensory) become disabling when they interact with prevailing attitudes, behaviours and policies or physical spaces to effectively bar the individual(s) from participating fully and on an equal basis in society. For example, inaccessible signage or footpaths are environmental barriers that deny access to markets or workplaces for individuals with visual or physical impairments. Other types of barriers include attitudinal barriers such as stigma and discrimination, and institutional barriers such as discriminatory laws and policies. Impairments can also combine with other key factors and characteristics to compound the level of marginalisation, for example characteristics based on age, gender, ethnicity, socio-economic background, rural versus urban locations. People may also experience different levels of discrimination based on whether their

¹ See section on 'Defining disability' below for a definitions and models of Disability

² The Washington Group (WG) Questions are targeted questions on individual functioning intended to provide a quick and low-cost way to collect data, which allows disaggregation by disability status. See: <https://www.washingtongroup-disability.com/question-sets/wg-short-set-on-functioning-wg-ss/>

³ Please note this review is based on publicly available documents on Disability Inclusion or broader inclusion policies, but does not review each institution's investments.

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impairments are apparent or not. The experience of disability varies widely, with at least as much variation amongst people with disabilities as there is amongst those without disabilities.

Models of disability

The United Nations Convention on the Rights of Persons with Disabilities' (CRPD) human rights-based approach to disability inclusion places an emphasis on the accountability of governments, the private sector, and civil society for removing barriers that make impairments disabling.

The FCDO also adopts a person-centred and human rights-based approach to disability inclusion that is underpinned by the CRPD. The FCDO's human-rights based approach to disability is derived from OHCHR ([2010](#)) as follows:

"...seeks ways to respect, support and celebrate human diversity by creating the conditions that allow meaningful participation by persons with disabilities.

Protecting and promoting their rights is not only about providing disability-related services. It is about adopting measures to change attitudes and behaviours that stigmatize and marginalize persons with disabilities.' It is also about putting in place the policies, laws and programmes that remove barriers and guarantee the exercise of civil, cultural, economic, political and social rights by persons with disabilities"

This paper is framed according to this approach. In contrast, a 'medical model' approach to disability focuses upon 'fixing' the individual, not upon removing barriers external to the individual. A 'charity model' approach to disability typically positions people with disabilities as separate to mainstream society, with their needs met by others (e.g. housing people with disabilities within institutions).

Question 1: What strategic focus do IFIs have on disability inclusion and how does this measure up against evidence and best practice?

Overall approaches to disability inclusion

This section provides a summary of overall approaches to disability inclusion. Table 1 provides a comparative summary.

Disability inclusion specific strategies

Of the six institutions reviewed, only the **World Bank** and **ADB** were found to have specific Disability Inclusion policies – as either a strategy or a roadmap. Both **World Bank's** framework ([2018](#)) and **ADB's** roadmap ([2021](#)) include measures to mainstream disability inclusion; gather and publish data; build external partnerships; and grow organisational capacity on disability inclusion. Both documents also distinguish between interventions that address disability inclusion gaps, and mainstreaming across wider investments.

The **EBRD** addresses disability inclusion as part of its wider approach to social inclusion. The **EBRD** does not have a stand-alone disability inclusion strategy. Disability is mentioned in its 'Equality of Opportunity Strategy 2021 – 2025 (EoS) ([2021](#)) - which is the

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organisation's wider approach to inclusion. The EoS does not include specific measures on disability, only recognising disability as one of a number of intersecting characteristics that can lead to inequality of opportunities and inhibit economic participation. The EoS aims to provide an operational response to equality of opportunities at the level of investments and policy engagements, as well as a framework for impact.

The **AfDB** do not have any specific strategies relating to disability inclusion. Some guidance is available from the African Union on disability inclusion ([2020](#)) in relation to youth exchange programmes. The **AfDB** does address disability inclusion through its updated Integrated Safeguards System (ISS) ([2013](#)), a set of safeguard requirements that Bank clients are expected to meet when addressing social and environmental impacts and risks. Organisations of Persons with Disabilities (OPDs) and UNOCHR have however, highlighted that the **AfDB's** approach to people with disabilities as part of the ISS needs to be integrated, systematic, and consistent in its approach to the inclusion of marginalised groups, including persons with disabilities; outline detailed plans for staff capacity, budget, and training to implement the standards in relation to disability, and provide more detail on how persons with disability can access consultations and grievance mechanisms ([BIC 2022](#); [UNOCHR, 2022](#)).

Definitions of disability inclusion

Where disability was defined, all institutions adopt a rights-based approach to disability inclusion⁴ citing the CRPD definition specifically as a basis for their definitions. This applies to **World Bank** ([2018](#)), **ADB** ([2022](#)), **EBRD** ([2020](#)), and **IFC** ([2022](#)).

No materials were available for the **AfDB** or **IMF** to verify their definitions. However, UNOCHR recently highlighted that **AfDB's** language around persons with disabilities as part of their Integrated Safeguards System as being too focused on 'vulnerable groups' and in an inconsistent way. This suggests that disability is inherently tied to being vulnerable, which is not in line with a rights-based approach ([UNOCHR, 2022](#)).

Research and knowledge on disability inclusion

The **World Bank** ([WHO & World Bank, 2011](#)), **EBRD** ([2020](#)), and **IFC** ([2022](#)) have all published research on Disability Inclusion from the perspective of their institutions. The **World Bank** and **EBRD** research provides recommendations for their respective institutions, while the **IFC** research aims to build the case for inclusive banking and capture emerging trends. These do not constitute commitments or strategies, but, in the case of **EBRD** and **IFC**, which do not yet have a dedicated strategy, these publications are a first step towards establishing why disability inclusion matters and how each organisation can engage.

External engagement and influencing

The World Bank Group ([2018](#)) (which includes both **World Bank** and **IFC**), and **ADB** ([2018](#)) have both made a number of commitments at the Global Disability Summit hosted by DFID (now FDCO) in 2018. Both institutions have made commitments on Inclusive Education, and Data Disaggregation. The **World Bank** Group has also made further commitments on Technology and Innovation, Commitments on Women and Girls with Disabilities, and

⁴ Where institutions did not have specific strategies on disability inclusion, definitions were taken from research or publications from each institution.

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Commitments for people with disabilities in Humanitarian Contexts. The **ADB** has further commitments to eliminate Stigma and Discrimination, and Economic Empowerment.

The **World Bank**, **ADB**, and **EBRD** are also members of the Global Action on Disability (GLAD) Network ([GLAD, n.d.](#)). The GLAD network are a coordination body of bilateral and multilateral donors and agencies, public and private foundations as well as key coalitions of the disability movement with a common interest in achieving inclusive international development and humanitarian action.

Disability inclusion in safeguarding standards

Disability inclusion is also considered partially in safeguarding standards by IFIs. For example, the **IFC**'s Performance Standards ([2012](#)) require clients to not discriminate on the basis of disability as part of employment and labour procedures; or to identify the differentiated needs of 'vulnerable groups' in impact assessments. The Performance Standards also recommend the use of Universal Design⁵ in infrastructure investments. Similar standards can be found in **AfDB** ([2021](#)) and **EBRD**'s ([2019](#)) equivalent safeguarding standards.

Disability inclusion in corporate results

Tracking disability inclusion as part of corporate results is an important way to track impact on disability inclusion, as well as incentivising and catalysing institutions to think about how they are addressing the issue.

The **ADB** has a standalone tracking indicator on Disability Inclusive interventions ([ADB, 2022](#)). This means that project indicators can be assigned that track against disability inclusion – which is subsequently used to monitor the institution's progress against its broader corporate goals and strategic alignment. **ADB**'s Roadmap also proposes the use of Disability Inclusion markers to catalyse action and demonstrate impact across its portfolio.

The **EBRD** has a tracking indicator on clients introducing Equal Opportunity Actions Plans (EOAPs), which is disaggregated to include number of clients with EOAPs focused on disability ([EBRD, 2021](#)).

⁵ Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. It is considered good practice in infrastructure and urban design. See more here: <https://universaldesign.ie/what-is-universal-design>

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Table 1 Comparative overview of disability inclusion in selected institutions

	Specific Disability Inclusion Strategy?	Period covered by Strategy	Rights-based Approach for Disability inclusion?	Mainstreaming of Disability inclusion in wider programming?	Use of Washington Group questions?
World Bank	Disability Inclusion and Accountability Framework (2018)	2018 onwards	Yes – CPRD Definition	Yes – outlined in framework	Referenced in research but use not described in Framework.
ADB	Strengthening Disability-Inclusive Development: 2021–2025 Road Map	2021-2025	Yes – CPRD Definition	Yes – outlines in roadmap	Recommended in Roadmap – has been used in some projects. ⁶
AfDB	No	n/a	Repeated reference to people with disabilities in Integrated Safeguards as ‘vulnerable’	No	No
EBRD	No – but disability mentioned in Equality of Opportunity Strategy (2021-2025)	2021-2025	Yes – CPRD Definition	Indirectly – through Equality of Opportunity Strategy	No
IFC	No	n/a	Yes – CPRD Definition	No	No but recommended in research paper
IMF	No	n/a	Not defined	No	No

⁶ ADB used these questions in household surveys in a study of social services linked with social assistance in the PRC (under a technical assistance project) and a review of the situation of people with disabilities in Mongolia (under a project preparatory technical assistance project).

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Strategic focus around disability inclusion

Table 2 outlines thematic focus areas of IFIs and operational priorities in relation to disability inclusion as identified in their strategies or key documents relating to disability inclusion.

Table 2 Thematic and Operational Priorities for each institution

	Thematic Focus Areas in relation to Disability Inclusion	Operational Priorities
World Bank	Transport, urban development, disaster risk management, education, social protection, jobs and employment, information and communication technology, water sector operations, and health care.	<p>(1) apply a twin-track approach for recognizing persons with disabilities among the beneficiaries of all projects while also carrying out specific projects to address the main gaps to their inclusion;</p> <p>(2) adopt explicit references to disability in general policies, guidelines, and procedures that shape the Bank's activities;</p> <p>(3) identify focus areas for disability-inclusive projects and advisory services;</p> <p>(4) collect data to improve the evidence base on the situation of persons with disabilities;</p> <p>(5) build staff capacity and organizational knowledge on disability inclusion; and</p> <p>(6) develop external partnerships for implementing the disability inclusion agenda.</p> <p>See: (World Bank, 2018)</p>
ADB	<p>Component 4 of the Roadmap outlines objectives for addressing disability inclusion in the following sectors:</p> <ul style="list-style-type: none"> Infrastructure and urban development Education Health Finance Private Sector Social Development Social Protections Assistive technology and inclusive design 	<p>COMPONENT 1: Coordinate actions on disability inclusion across different departments and sectors of ADB and develop capacity within the organization.</p> <p>COMPONENT 2: Establish partnerships to leverage advocacy impact.</p> <p>COMPONENT 3: Establish a culture of data disaggregation and publishing disability-sensitive analysis.</p> <p>COMPONENT 4: Develop sector guidelines and gradually expand portfolio of disability-inclusive development interventions.</p> <p>COMPONENT 5: Strengthen disability inclusion standards in ADB workplaces, policies, and practices.</p> <p>See: (ADB, 2022)</p>
AfDB	Disability inclusion not addressed in strategy	Disability inclusion not addressed in strategy

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<p>EBRD</p>	<p>documents or research publications.</p> <p>The nexus of equality of opportunity and the megatrend of climate change and green economy transition.</p> <p>Digitalisation, Future of Work including a focus on Building Back Better post the COVID-19 pandemic.</p> <p>Inclusive regions with a focus on equal opportunities for underserved and periphery regions as well as well-managed migration.</p> <p>Gender Equality, Youth Inclusion, People with disabilities, ageing workforce, local communities and other groups including refugees and migrants.</p> <p>Scaling up the Bank’s policy dialogue response to unlock equality of opportunity for all.</p>	<p>documents or research publications.</p> <ol style="list-style-type: none"> 1. Broadening skills, employment and sustainable livelihoods that better reflect challenges and opportunities resulting from new forms of work (for example platform economies, new digital ways of working) and to tackle informality; 2. Building inclusive and gender-responsive financial systems and business environments with a focus on introducing a broader emphasis on financial inclusion and the development of inclusive financial system, and; 3. Creating inclusive and gender-responsive services and public goods that integrates a focus on broader public goods, including accessible infrastructure and an ability to use public realm and facilities in an equitable way that is open to all. <p>See: (EBRD, 2021)</p>
<p>IFC</p>	<p>No strategy or policies on DI, but a recently published research paper (2022) outlines following areas of relevance:</p> <p>Inclusive Banking – including:</p> <ul style="list-style-type: none"> • Increasing the share of persons with disabilities in the workforce • Creating inclusive leadership teams and workplaces • Driving the disability inclusion agenda in banking • Offering products and services that respond to the needs of persons with disabilities • Implementing commitments to disability inclusion in investment and procurement practices • Partnerships, community support, and outreach 	<p>n/a</p>
<p>IMF</p>	<p>No disability policies related to lending and programmes.</p> <p>IMF polices on disability focus on internal Diversity and Inclusion plans.</p>	<p>Relaunched a working group on disabilities and created an Employee Resource Group, THRIVE, to ensure that employees with a disability and those caring for dependents with disabilities have a voice in shaping our future work environment. (IMF, 2020)</p>

Question 2: How does the work of IFIs on disability inclusion relate to [FCDO’s Disability Inclusion and Rights Strategy](#)?

This section compares areas of activity of each institution reviewed to the priority intervention areas of the FCDO as outlined in its Disability Inclusion and Rights Strategy.

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These are:

- > Universal human rights, freedom and democracy
- > Inclusive education
- > Inclusive health
- > Inclusive social protection
- > Inclusive economic empowerment
- > Inclusive humanitarian action
- > Emerging area: Climate action.

In addition, the FCDO Strategy's enablers for inclusion, are used as further points for comparison between the disability inclusion strategy or programming focus of other IFIs.

- > Assistive technology,
- > Strengthening organisation of persons with disabilities and
- > Empowerment of people with disabilities

This comparison is based on material available in strategy documents or research papers on disability inclusion from each institution. It does not compare or review specific investments made by each institution, which may directly or indirectly contribute to disability inclusion. As such, it should not be treated as comprehensive. It should also be noted that due to an absence of documentation on disability inclusion from **AfDB** and **IMF**, the majority of this comparison refers to the **World Bank**, **ADB**, and research papers from **EBRD** and **IFC**. Table 3 provides an overview of engagement on specific intervention areas.

Table 3: Overview comparison against FCDO focus areas

FCDO Key Intervention Areas	World Bank	ADB	AfDB	EBRD	IFC	IMF
Universal human rights, freedom and democracy	Yes	Yes	Not found	Not found	Not found	Not found
Inclusive Education	Yes	Yes	Not found	Not found	Not found	Not found
Inclusive Health	Yes	Yes	Not found	Not found	Not found	Not found
Inclusive Social Protection	Yes	Yes	Not found	Not found	Not found	Not found
Inclusive Economic Empowerment	Yes	Indirectly	Not found	Not found	Not found	Not found
Inclusive Humanitarian action	Not found	Not found	Not found	Not found	Not found	Not found
Inclusive Climate Action	Yes	Indirectly	Not found	Indirectly	Not found	Not found
Assistive Technology	Not found	Yes	Not found	Not found	Not found	Not found
Strengthening organisation of persons with disabilities	Yes	Yes	Not found	Not found	Not found	Not found
Empowerment of people with disabilities	Yes	Yes	Not found	Indirectly	Indirectly	Not found

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Key:

- > **Yes** – Directly works on this area in near or equivalent terms defined by FCDO Strategy.
- > **Indirectly** – Indirectly contributes to disability inclusion in this area or cites its importance
- > **Not found** – No information found to show disability inclusion specific commitments, actions or investments in this area

Comparison to key intervention areas:

1. Universal human rights, freedom and democracy

The FCDO Strategy seeks to embed disability rights in rules and standards in the built environment; support diverse meaningful participation and leadership in political and public life; and tackle discriminatory beliefs, practices, structures and systems at all levels. As such, it positions itself with a stronger advocacy focus in comparison the IFIs reviewed.

The **World Bank** and **ADB**, by virtue of disability inclusion specific strategies, have explicit commitments around implementation of the CRPD and to advocate for disability rights at a global level – in line with the FCDO Strategy’s goal of shaping multilateral architecture and international rules to embed disability rights. The **World Bank**’s framework emphasises the need to strengthen its cooperation with key strategic partners to ‘promote a cohesive and collaborative approach to disability-inclusive development with reference to the SDGs, the New Urban Agenda, the Sendai Framework, and the CRPD.’ The framework notes that the **World Bank** can ‘use its convening power to bring development partners to the table, including philanthropic organizations and private foundations, and to facilitate knowledge sharing among them.’ Similarly, the **ADB** roadmap contains goals to engage with regional and global disability platforms and initiatives, and with civil society organisations, as well as to ‘bring new knowledge of regional challenges and progress in [CRPD](#) and [Incheon Strategy implementation](#) to the [The Global Action on Disability \(GLAD\) Network](#) and other platforms.’

In comparison to the FCDO’s strategy, however, there is greater emphasis in **World Bank** and **ADB** documents on expanding internal capacity and expertise on disability inclusion, so that they are able to provide stronger guidance and support to clients in implementing the CRPD and championing universal human rights.

The **AfDB** and **IFC**’s respective safeguarding and performance standards mention the need for clients to incorporate universal design standards. This is in line with FCDO’s own target on universal human rights, freedom and democracy and the promotion of building standards.

The **World Bank** and **ADB**’s strategy documents also contain actions relating to supporting diverse meaningful participation and leadership in political and public life. For example, the **World Bank** framework notes that consultations with end beneficiaries and their representative organisations throughout the project cycle are an important means of ensuring that projects address the needs of persons with disabilities and are shaped with their input..’, as well as emphasising the need for stronger links with disability advocates and OPDs to facilitate networking, strategic dialogue, and knowledge sharing. The **ADB** roadmap also emphasises notes the need for consultation with people with disabilities to be considered in the guidelines on sustainable procurement used in **ADB** sovereign operations. It recognises the need to encourage people with disabilities among the project beneficiaries to take part in project planning and poverty and social assessments, and the need for **ADB** operations to provide guidelines in support of this.

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The **EBRD** does not contain specific commitments under its Equality of Opportunity strategy on universal human rights, freedom and democracy. However, as part of a research paper published by **EBRD** on disability inclusion, recommendations are provided for **EBRD** to engage in policy dialogue in countries where the Bank invests to raise awareness of barriers to people with disabilities and of opportunities to strengthen their economic participation. This includes raising awareness of important legislative barriers, and promoting the adoption and progressive implementation of accessibility standards.

Inclusive education

The FCDO Strategy focuses on Increasing visibility of children with disabilities by contributing to the global evidence base and improving collection, analysis and use of disaggregated data; Ensuring children with disabilities in humanitarian and protracted crises are given an equal opportunity to learn in safe, inclusive, protective environments; and prioritising interventions that tackle the barriers children with disabilities. The FCDO also emphasises a focus on girls with disabilities and their experience in accessing quality education and learning.

As part of the **World Bank's** Ten Commitments on Disability Inclusion ([2018](#)), the Bank aims to ensure that all World Bank-financed education programs and projects are disability-inclusive by 2025. The **World Bank** framework outlines possible areas of intervention which include analytical work and evidence collection on gaps and barriers to inclusion, and policies and programmes to improve participation of students with disabilities; strengthening data collection on prevalence and barriers to education; improving inclusive approaches; technical support to clients; and accessibility in physical and virtual infrastructure for education funded by the **World Bank**.

The **ADB** roadmap contains actions on education that include identifying gaps in the existing education portfolio. This includes further supporting inclusion and innovations that will expand the quality and range of disability-inclusive education policies, public finance mechanisms, and practices from early childhood development programs through kindergarten and pre-school, and the primary and secondary levels. The **ADB** also aims to invest in accessible and disability-inclusive university degree courses, vocational training, and lifelong learning programs to ensure the inclusion of people with disabilities.

Inclusive health

FCDO's Strategy in this area focuses on influence disability inclusion through our bilateral, multilateral and partner engagement and diplomacy; supporting data research and evidence to shape inclusive health systems; and supporting advocacy, inclusion, and meaningful participation of people with disabilities.

The **World Bank** framework commits to initiatives to make health service coverage universal and inclusive for persons with disabilities, in alignment with Sustainable Development Goal 3 and the **World Bank's** Environmental and Social Framework. This includes analysis of barriers to accessing health services and collection of disability-disaggregated data; applying universal access and design approaches in health infrastructure projects; promoting disability-inclusive universal health coverage in health care reform projects; training programs for health professionals on the specific health needs and rights of persons with disabilities and the need to eradicate stigma against persons with disabilities; community-based approaches in mental health care that integrate prevention, treatment, and care services and promote deinstitutionalisation and alternatives to coercive

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care practices in mental health services.

The **ADB** roadmap aims to incorporate disability inclusion in universal health coverage strategies and in health sector reforms; and in the design of hospitals and health care facilities of the future. Measures that will expand national health insurance financing (and other types of government financing) for rehabilitation, mental health services, prosthetics, assistive devices, and technology promotion. The **ADB** also aims to support disability-inclusive post-COVID-19 response and recovery programs. It also recognises the need to enhance capacity of the health sector workforce for disability inclusion.

Inclusive social protection

The FCDO Strategy aims to strengthen social protection policies, strategies, programmes and systems and increase global and national focus on disability-inclusive social protection.

The **World Bank** has committed to ensuring that 75% of **World Bank**-financed social protection projects are disability-inclusive by 2025. The World Bank's framework notes that the Bank will strive to make social protection systems universal and inclusive for persons with disabilities - in alignment with the SDGs, the World Bank Environmental and Social Framework, and the recommendations of the World Report on Disability.

This includes ensuring that all social protection programs are disability-inclusive; analysis of the impact of social safety nets on persons with disabilities and means of including specific costs associated with disability in the design of the safety net programs; promoting disability-inclusive universal social protection systems in social protection reform projects to ensure that persons with disabilities can access mainstream schemes and disability-specific benefits; development of programs for disability benefits and support services that address disability-related needs and costs enabling persons with disabilities to access social and employment services; collection of disability-disaggregated administrative data to monitor disability inclusion in social protection systems; jointly with the WHO and other development partners, assist countries in improving disability measurement and collecting comprehensive data on disability experience that would enable development of evidence-based disability policies; and assisting in the development and implementation of disability assessment and evaluation methodologies for determining eligibility for disability-related social protection measures.

The **ADB** similarly commits to supporting disability-inclusive social protection, including as part of a forthcoming social protection strategic framework. **ADB**'s roadmap also notes the need to support COVID-19 recovery, gaps and design issues in social protection programs, increasing the coverage of specific vulnerable groups, such as persons with disabilities.

Inclusive economic empowerment

Out of the institutions reviewed, The **World Bank** was the only one to have specific commitments to inclusive economic empowerment. However, the **ADB** and **EBRD** indirectly address economic empowerment of persons with disabilities. In contrast, the FCDO strategy has a strong emphasis on inclusive economic empowerment, and highlights the FCDO's work spanning many sectors and approaches. There is a strong emphasis full and meaningful economic and social participation of people with disabilities; and on addressing systematic barriers to economic empowerment and increasing access to economic assets through disability-inclusive infrastructure.

The **World Bank** has specific action in its Framework to promote labour market

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participation, employment, income generation, and sustainable livelihoods for persons with disabilities. The Bank's framework aims to carry out analysis on employment and barriers to labour markets of persons with disabilities; review policies and interventions aimed at increasing labour market participation of persons with disabilities; develop strategies and operations to increase inclusion of persons with disabilities in jobs, skills development and training; improve accessibility and reasonable accommodation in projects promoting technology for jobs; promote disability inclusive income generation through labour and employment.

The **ADB**, while not having a specific component of its Roadmap dedicated to economic empowerment, does note the overall economic costs to society of excluded persons with disabilities. It also seeks to address economic empowerment through actions on urban development and infrastructure, which are important facilitators of economic inclusion. Similarly, transport, infrastructure, and urban development feature prominently as part of the **World Bank's** disability inclusion strategy. For example, the Bank commits to ensuring that all **World Bank**-financed urban mobility and rail projects that support public transport services are disability-inclusive by 2025. The **World Bank** notes that persons with disabilities experience significant transport disadvantage and transport-related social exclusion from economic activity, goods, and services – and outlines policies and practices to improve disability inclusive transport.

The **EBRD**, while not addressing disability inclusion in a standalone strategy, incorporates it as part of its Equality of Opportunity Strategy. This strategy ties closely to **EBRD's** strong private sector focus in contrast to other IFIs. The strategy overall aims to strengthen human capital and resilience through investments and policy engagement. Broadening skills, jobs and sustainable livelihoods is one of three focus areas of the strategy.

Inclusive humanitarian action

The FCDO's strategy commits to hold the international humanitarian system to account in ensuring disability inclusion is effectively integrated across humanitarian response through fulfilment of minimum standards by all actors. This includes data collection, capacity building, and holding partners to account for commitments made at the Global Disability Summit 2018, and where opportunities arise, to engage with networks of OPDs in humanitarian systems reform.

The IFIs reviewed as part of this study do not have a focus on disability inclusion in humanitarian action. However, the **World Bank** and **ADB** do incorporate disaster risk reduction and resilience (see below) as part of their disability inclusion approaches, which can influence the inclusion of persons with disabilities in humanitarian emergencies.

Emerging area: inclusive climate action

The FCDO strategy emphasises the disproportionate impact on persons with disabilities from Climate Change. The FCDO commits to focus on building more inclusive adaptation and resilience, sustainable and accessible physical environments, promoting locally-led developments and clean energy which is accessible to all; invest in more robust research and evidence on disability inclusive climate action; and work in partnership with key allies to accelerate global attention and action including through key funds, to institutionalise disability inclusion in their work.

World Bank and **ADB's** disability inclusion approaches focus more specially than the

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FCDO on disaster risk reduction and resilience, rather than mainstreaming disability inclusion more broadly across climate or climate finance. The World Bank Framework commits to ensuring that all projects financing public facilities in post-disaster reconstruction are disability-inclusive. The World Bank aims to make resilience and disaster risk management (DRM) operations disability-inclusive in alignment with the Sendai Framework for Disaster Risk Reduction 2015–2030, the SDGs, the New Urban Agenda, and the World Bank Environmental and Social Framework. Possible interventions focus on mainstreaming disability into DRM consultations, needs assessments, infrastructure development, services, management plans, and policies; ensuring that physical and virtual infrastructure related to disaster management and resilience are designed in line with accessibility standards; supporting clients to integrate the needs of persons with disabilities in resilience and disaster management; and promoting disability inclusion through accessibility standards and universal design when ‘building back better’ in post-disaster recovery. The **ADB** also note that ‘the needs of people with disabilities should be considered in communications, search-and-rescue, and temporary shelter strategies and guidelines.’

The **EBRD’s** strategy notes that climate change affects different parts of the EBRD region in differing ways, requiring a targeted approach to ensuring that people and communities – regardless of their circumstances – can benefit from the opportunities that a green economy transition can bring, and are empowered to take mitigation and adaptive measures. It does not however, go into any specific responses that pertain to disability inclusion.

The **IFC’s** research paper on inclusive banking notes that disability inclusion should be integrated into emerging investment strategies, including those related to climate change and green finance.

Enablers for inclusion:

Assistive technology

The FCDO Strategy notes that Appropriate accessible and affordable assistive technology (AT), including wheelchairs, prosthetics and orthotics, spectacles, hearing-aids and digital devices, is a key enabler for change. The Strategy also commits to bridge the disability divide through mobile and digital technologies that can link excluded people to education, jobs, finance and markets and create opportunities for marginalised voices to be heard.

The **ADB** roadmap aims to build understanding of assistive technology and inclusive design, and incorporate this in the development of sector guidelines for the Bank. This includes a knowledge base on assistive technology and inclusive design, including barriers, challenges, and innovative solutions in financing, policy development, manufacturing, and design and implementation – noting that it should be developed in partnership with Global Disability Innovation Hub and other specialists.

The **World Bank’s** framework does not have a specific focus on assistive technology, but looks more broadly at prioritising disability inclusive ICT and notes the role it can play in facilitating access. These actions are focused on accessible design standards in ICT, using ICT to address barriers faced by persons with disabilities in education, employment, social participation, and health; and policies and regulations to support adoption of accessible ICT.

IFC’s research paper also cites assistive technologies as a way to facilitate access to banking, providing case studies of how it is being successfully used by banks for their

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customers.

Strengthening organisation of persons with disabilities

The FCDO strategy states the need to enable active involvement of OPDs in FCDO's work in alignment with the CRPD, as well as support to build the organisational capacity of OPDs. While the IFIs reviewed acknowledge the importance of OPDs and the need to consult, partner, and collaborate, no strategies were found to commit to supporting the growth of these organisations as per FCDO's approach.

The **World Bank** outlines the need for teams need to consult, partner, and collaborate with persons with disabilities, OPDs, and other civil society organizations that work on disability issues in operational and analytical work.

The **ADB** Roadmap recognises the wealth of knowledge of disability inclusion among international and national nongovernment organizations (NGOs) and their experience in this matter, and commits to engaging with OPDs and civil society organizations experienced in disability inclusion, both through a reference group and in national and regional operations.

The **IFC** research paper on inclusive banking notes that partnerships with OPDs, think tanks, civil society, and community-based organisations, 'allow banks to strengthen their long-term commitment to disability inclusion.'

The **EBRD** research paper on economic inclusion of people with disabilities mentions the need to collaborate with international civil society organisations, such as the International Disability Alliance, and national organisations that represent the interests of people with disabilities, to understand the key needs of and barriers facing people with disabilities.

Empowerment of people with disabilities

The FCDO Strategy notes that the experience of people with disabilities differs dramatically due to the multiple and intersecting identities they experience, including their SOGIESC, age, ethnicity, race, location, socio-economic status, legal status and other factors. It commits to prioritising the inclusion and rights of marginalised and under-represented groups in disability inclusion.

The **ADB** and **World Bank** both similarly acknowledge the intersecting nature of exclusion that can impact persons with disabilities. **EBRD** highlights this in their research report with regards to disability inclusion, and more generally as part of its Equality of Opportunity Strategy.

The **ADB** roadmap notes that **ADB** should develop guidelines on gender and disability inclusion. However, beyond this reference from **ADB**, specific actions to look at the intersecting nature of exclusion as part of disability inclusion were minimal across the institutions reviewed.

Question 3: What opportunities are there to strengthen the work of IFIs on disability inclusion?

Recommendations for FCDO engagement on disability inclusion with the World Bank

> **Continue to champion Disability Inclusion with the World Bank.** FCDO can continue to

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engage with the World Bank as equal partners in terms of the importance placed on disability inclusion in development programming and outcomes.

- > **Leverage FCDO's position as a bi-lateral donor.** The FCDO can leverage its diplomatic influence and UK leadership to champion Universal human rights, freedom and democracy in ways that are complimentary to the World Bank's harder financing relationships with its clients. This includes a more 'outward' facing role in advocating for fulfilment of commitments to disability inclusion, particularly as the FCDO has a stronger emphasis on advocacy in its Strategy.
- > **Draw on World Bank's focus on urban development and infrastructure related experience in disability inclusion.** The World Bank's Disability Inclusion framework includes specific focus on Transport, Urban Development, Water, and Digital sectors – which is not addressed by the FCDO strategy. However, the FCDO also works in these sectors. The FCDO could benefit from partnership and knowledge from World Bank expertise to strengthen disability inclusion in its wider urban and infrastructure programming. The FCDO could also strengthen the links in its urban and infrastructure sectors to its Disability Strategy.
- > **Work with the World Bank to enhance focus on digital technology and disability inclusion.** The World Bank Framework outlines in detail a strategic focus on the ICT sector. The FCDO strategy could be strengthened and supported with collaboration in this area drawing on expertise and experience with the World Bank.

Recommendations for FCDO engagement on disability inclusion with other IFIs

- > **Support the development of disability inclusion specific strategies.** The AfDB, EBRD, IFC, and IMF still lack a dedicated Disability Inclusion strategy. These institutions could be supported to develop disability inclusion focused strategies that align with corporate objectives and other social inclusion initiatives (such as Gender Strategies). A specific strategy on disability inclusion goes beyond broader inclusion strategies and can provide clarity and specificity on disability inclusion issues.
- > **Hold partners to account through commitments made at the Global Disability Summits in 2018 and 2022.** As host for the 2018 GDS, the FCDO has convening power and can hold partner organisations to account for commitments made at the summits. These commitments could be used to catalyse action with the World Bank and ADB in line with the FCDO's own priority intervention areas.
- > **Foster more equitable and empowering relationships with OPDs through FCDO's convening power.** Most IFIs with disability inclusion focused strategies or research recognise the importance of OPDs in defining challenges and solutions with regards to disability inclusion. However, few IFIs commit to supporting the growth of these organisations in the same terms as the FCDO strategy. The FCDO could demonstrate more equitable partnerships and share experience of empowering OPDs, encouraging IFIs to set up more impactful partnerships.
- > **Support IFIs to adopt intersectional approaches to disability inclusion.** The FCDO Strategy outlines how people with disabilities who experience multiple, intersecting and compounding forms of discrimination are likely to be amongst the most left behind. While the ADB and World Bank acknowledge this intersectionality, the other IFIs lack any explicit

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mention of this. The FCDO could support wider incorporation of this approach, drawing on experience in programmes to identify specific actions and ways to address intersectionality.

- > **Support the development of Disability Inclusion measurement frameworks.** Measurement frameworks and indicators can be an effective tool to catalyse action and impact on disability inclusion. What gets measured is more likely to be implemented. Apart from the ADB, measurement frameworks on IFI impact for disability inclusion were not identified in this review. IFIs could be supported to strengthen this through the sharing of disability inclusion Theories of Change and Indicators that feed into corporate results.
- > **Support IFIs such as the World Bank and ADB to align disaster risk reduction and resilience of persons with disabilities with FCDO's ambitious on inclusive humanitarian action.** While IFIs do not engage directly in humanitarian aid, efforts could be made to align best practices in their disaster resilience investments with FCDO's objectives around humanitarian action. This could be done with the aim of reducing the impact of disaster on persons with disability, and enhancing their ability to recover.

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