Ms Satu Santala, Nordic Executive Director, World Bank

Your ref.: Our ref.: 21821/v1

Helsinki, Copenhagen, Stockholm, Oslo, 2015.05.11

Joint letter from Nordic disability and development organisations calling for disability inclusion in the World Bank Safeguards

As organisations working in the field of disability and development, we have noted the World Bank’s long-standing commitment to disability, and applaud the recent appointment of Charlotte McClain-Nhlapo as a Disability Advisor. However, there is still a great need for institutionalising disability inclusion and accessibility throughout World Bank operations. This process of updating the safeguards is a great opportunity to ensure such institutionalisation in the standards and set a global standard for disability inclusion in development operations.

We have taken part in the second round of consultations through direct participation as well as written submissions. We are aware that there is now a process of developing a 2nd draft of the Safeguards. Therefore, we want to take this opportunity to draw your attention to the need for a greater focus on disability inclusion in the next draft.

In particular, we call for the following:

- Persons with disabilities must be explicitly referenced in ESS 1 (Assessment and Management of Environmental and Social Risks and Impacts), and the assessment must look at the unique and specific impacts of projects on persons with disabilities, not on disadvantaged or vulnerable groups as a whole. This assessment must also look at inclusion\(^1\) and accessibility\(^2\) to ensure that there are no barriers to participation in Bank projects and all, including persons with disabilities, are able to benefit.
• Persons with disabilities must also be explicitly referenced in ESS 10 (Information Disclosure and Stakeholder Engagement) to ensure that consultations are inclusive and accessible and the grievance mechanism is also accessible to all, including persons with disabilities, so that people can seek redress. This will also help to ensure that persons with disabilities are involved at all stages of the World Bank project lifecycle—from concept and design to implementation to monitoring.

• Principles of universal access\(^3\) must be incorporated into all relevant standards to ensure full participation and benefits for all people.

• Vision statement of the standards must include a reference to the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and all language referencing disability must be in line with the CRPD.

• There must be systematic integration of disability across all relevant standards\(^4\), including Assessment and Management of Environmental and Social Risks and Impacts (Environmental and Social Standard 1); Labor and Working Conditions (Environmental and Social Standard 2); Community Health and Safety (Environmental and Social Standard 4); Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (Environmental and Social Standard 5); Indigenous Peoples (Environmental and Social Standard 7); Cultural Heritage (Environmental and Social Standard 8); and Information Disclosure and Stakeholder Engagement (Environmental and Social Standard 10).

We would also like to draw your attention to the following written submissions:

• The Red-Lined draft of ESS1 submitted by the Disability & World Bank Safeguards Campaign and endorsed by 235 disability and development organizations: 

• Joint submission from the International Disability & Development Consortium (IDDC) and the International Disability Alliance (IDA):
We would be very happy to have a meeting to discuss this further. Depending on your travel schedule, we are available for meetings in any of our Nordic capitals, or in Washington, DC through the Bank Information Centre which is coordinating the Disability & World Bank Safeguards Campaign.

If you would like to get in touch in order to organise a meeting, please contact:

- For meetings in the Nordic countries: Silje Vold, Plan Norway (silje.vold@plan-norge.no)
- For meetings in Washington: Rachel Burton, Bank Information Centre, Washington DC (rburton@bicusa.org)

We look forward to hear from you,

With warm regards,

Kjell Erik Øie, Secretary-General, Plan Norway

Arnt Holte, Chairman of the Board, Atlas-Alliance, Norway

Anja Malm, Executive Director, Disability Partnership Finland
Timo Kuoppala, Chairman of the Board, Disability Partnership Finland

Tiina Nummi-Södergren, Chairperson, MyRight (Sweden)

Marianne Fredriksen, Head of International Department, Danske Handicaporganisationer / Disabled People’s Organisations Denmark (DPOD)
Inclusion – This means empowering all stakeholders to participate in, and benefit from, the development process. Inclusion encompasses policies to promote equality of opportunity by improving the access of poor and disadvantaged people to such facilities and services as education, health, social protection, infrastructure, affordable energy, employment, financial services, and productive assets; and, it embraces action to remove social and environmental barriers against those who are often excluded, such as women, children, youth, persons with disabilities, and minorities, or individuals and groups defined by ethnicity, social and civic status, sexual orientation, gender identity or expression, or indigenous status; and, to ensure that the voice of all stakeholders can be heard and responded to through effective means of disclosure, consultation, and communication (see ESS10).

Accessibility – The freedom and ability of all stakeholders to attach meaning to person-to-person and person-to-community unions that are established through emotional and environmental connections. Accessibility ensures disadvantaged and vulnerable people are given the same opportunity as any other community member to develop the personal attachments and identity that evolve through access of being included in shared experiences and environmental surroundings with groups, neighborhoods, and communities. For persons with disabilities accessibility is more than a function of universal design which may be a part of but not all of the accessibility measures necessary to promote independent living through full participation on an equal basis to others for all aspects of life such as measures that create access to the built environment, infrastructure, transportation, information and communications, and other facilities and services open or provided to the public. The relationship of social and environmental accessibility and inclusion for all people ensures resilience and longevity of the community.

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Disability is not currently included in ESS 2, 4 (beyond universal access which is briefly mentioned), 5, 7, or 8.