



Brussels, 5th January, 2015

RE: written contribution from the International Disability Alliance and the International Disability and Development Consortium regarding the World Bank's proposed Environmental and Social Framework

The International Disability Alliance is a global network of seven global and four regional organisations of persons with disabilities and their families, representing one billion persons with disabilities worldwide. A network of networks, the 11 members of the Alliance have regional, national and local members of their own. Together, we advocate for the rights of persons with disabilities in over 180 countries across the globe. The International Disability Alliance represents all persons with disabilities from both the Global South and Global North, and is the largest collective voice of civil society organisations run by persons with disabilities for persons with disabilities.

The International Disability and Development Consortium is a global consortium of 25 disability and development non-governmental organisations (NGOs), mainstream development NGOs and disabled people's organisations (DPOs) supporting disability and development work in more than 100 countries around the world. The aim of IDDC is to promote inclusive development internationally, with a special focus on promoting the full and effective enjoyment of human rights by all persons with disabilities living in economically poor communities in lower and middle-income countries.

As such, we would like to provide input regarding the review process of the World Bank's Safeguard Policies, specifically in order to raise the importance of disability inclusion and accessibility in programs supported by the Bank. The World Bank has in many areas provided a global lead on disability inclusion, in particular with the World Report on Disability from 2011 and the recent appointment of Charlotte McClain-Nhlapo as a Disability Advisor. This process of updating the safeguards is an opportunity to ensure better institutionalisation of disability inclusion and accessibility across World Bank operations, and by that set a global standard.

Overall, we welcome the mention of disability in several chapters, and the non-discrimination principles that are guiding this safeguards process. We also appreciate the inclusion of disability as a theme among the focus groups organized during the 2012-2013 round of consultations. However, we still think there is a need for clearer and stronger guidance on disability inclusion and accessibility throughout the documents.



We would like to suggest the following:

- Use the definition of « persons with disabilities », as well as the language outlined in the UN Convention on the Rights of Persons with Disabilities (UNCRPD) throughout the standards
- Ensure systematic, cross-cutting integration of disability throughout all safeguards/standards. For examples of how this can be done in practice, we refer to a submission by the Bank Information Centre (BIC) to which we have contributed¹. This submission includes a draft of ESS1 and ESS10 which makes practical suggestions of how and where disability inclusion and accessibility can be included in the document.
- Ensure that environmental and social assessments will be based on data disaggregated between different groups within the community, including persons with disabilities. That way the unique impacts upon persons with disabilities can be identified and assessed.
- Meaningfully include persons with disabilities and their organisations throughout the life cycle of World Bank projects, from initial consultation, through implementation, to review. To enable meaningful inclusion, it is crucial to identify and address potential barriers to access for persons with disabilities.
- Make efforts to ensure an accessible and inclusive grievance process, where possible barriers to the access of persons with disabilities are identified and addressed.
- Include a Universal Accessibility and Inclusion Plan as further annex to ESS 1, as suggested in the submission by the Bank Information Centre (BIC) mentioned above. This plan would be part of the ECP and ESMP, and would be specifically designed to ensure that disadvantaged or vulnerable groups are not excluded from World Bank projects and processes.

We hope these suggestions will be taken into account, and look forward to continue providing input into this consultation process.

With regards,

A handwritten signature in blue ink that reads "M Diamond".

Maryanne Diamond
Chairperson
International Disability Alliance

A handwritten signature in blue ink that reads "Johannes Trimmel".

Johannes Trimmel
on behalf of the Board
International Disability and Development Consortium

¹ This has already been suggested and presented to the World Bank during meeting with the Bank Information Centre. An updated and improved version will be submitted from BIC to the World Bank by February 2015. IDDC is providing input into this through our membership in BIC's steering committee for the campaign on disability.