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World Bank Safeguards Team

Oslo, 18.11.2014

Written submission from Plan Norway regarding World Bank safeguards consultation

We greatly appreciate the opportunity to provide feedback into the safeguard review process. The safeguards are an essential mechanism for ensuring accountability in World Bank operations.

In addition to supporting the joint letter from Norwegian CSOs presented at the consultations in Oslo 12.11.2014, Plan Norway would like to raise specifically the importance of disability inclusion and accessibility.

We are aware that the World Bank has a 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 and set a global standard for disability inclusion in development operations.

We have the following specific suggestions:

- **Include** persons with disabilities and their organisations in an accessible safeguard review consultation process
- **Define** “persons with disabilities” using the definition outlined in the CRPD
- **Assess** the unique and differentiated impacts of Bank projects on persons with disabilities rather than assessing a project’s impact on what the Bank is calling “disadvantaged or vulnerable populations” which includes a wide range of groups differently impacted by projects

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- **Ensure systematic, cross-cutting integration** of disability throughout all safeguards/standards,
- **Define “accessibility”** to include full participation of persons with disabilities in the World Bank project lifecycle, modeled after CRPD Article 9, and budget for its implementation
- Include a **Universal Accessibility and Inclusion Plan** as an annex to ESS 1

Finally, we would like to draw your attention to the attached red-lined draft of ESS 1 and 10, which makes practical suggestions of how and where disability inclusion and accessibility can be included in the document. It also includes a suggestion for a Universal Accessibility and Inclusion Plan as an annex to ESS1. This red-lined draft is developed by the Bank Information Centre (BIC) World Bank Safeguards Campaign on Disability, to which we have provided input.

With regards,

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