

A new International Disability Equity and Rights Strategy

Palladium submission

15 December 2023

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1. Executive summary

Palladium welcomes the opportunity to contribute to the development of Australia's new International Disability Equity and Rights Strategy. We are a global company which works with governments, businesses and investors to solve the world's most pressing development challenges. Australia's International Development Policy (August 2023) has a strong focus on partnerships and locally led development, with a renewed focus on disability equity. The policy emphasises that for development to be effective, people with disabilities must be partners on an equal basis. As the successor to the *Development for All* strategy, the new Disability, Equity and Rights Strategy needs to ensure that Australia continues to be a leader for disability equity and rights.

Palladium is a leading implementer and influencer for disability access and inclusion. This is evident through our Maven Disability Access and Inclusion Service which was designed by Palladium staff with lived experience of disability. Our Disability Access and Inclusion Service's goal is to change how society views people with disability, not because it feels good, or helps tick-boxes, but because we know that there is significant value in seeing, hearing and listening to the diverse perspectives of the human experience.

Palladium also considers disability as part of our cross-cutting social inclusion approach which recognises that disability intersects with other social, cultural and economic inequities. We envisage a world that leaves *no one behind* and where universal access to opportunities are upheld, safety and security are guaranteed and all individuals are treated fairly and equitably in their homes and communities.

Our key recommendations for Australia's International Disability, Equity and Rights Strategy are that the Australian Government:

1. Continues focussed investment and resourcing for disability inclusive and accessible primary, secondary, tertiary and skills development programs;
2. Increases investment in disability data collection tools, processes and reporting, including working with (and influencing) partner governments to improve baseline data for disability; and
3. Increases accountability requirements for development partners so that there are mandatory thresholds required for disability equity and rights. This should emphasize mainstreaming disability equity across development sectors with specific focus on climate resilience, humanitarian relief, infrastructure, and assistive technology.

We appreciate the opportunity to provide this submission and look forward to continuing to work with the Australian Government and its agencies in the future implementation of the Disability Equity and Rights Strategy under the new International Development Policy.

Yours sincerely,



Bernadette Howlett
Executive Officer

15 December 2023

2. Discussion

One in every six people in the world lives with a disability, making them the largest minority group in the world. Some 80% of people with disabilities live in developing countries including at least 700 million people in the Indo-Pacific region. It is estimated that 22% of people in the poorest communities in low-income countries have a disability.¹ Women, men, girls and boys with disabilities are often among the most marginalised in any community and are typically not included in development processes due to barriers that they face.² This can be further exacerbated when people with disabilities are displaced due to disasters, when they are geographically isolated and in conflict-affected communities.

In addition, each person's experience of disability is impacted by many intersectional factors, such as their age, sex, type of impairment, level of education, ethnic and religious background, place of residence and their cultural context. Disability and poverty reinforce and perpetuate one another.

Palladium's commitment to disability inclusive practices is evident through our Maven Disability Access and Inclusion Service which was established in 2019 as a service model that provides flexible and open employment to people with disability. The team of people with disability design, implement and evaluate Palladium's disability access and inclusion work at both an organisational and program level. Since its inception, our Disability Access and Inclusion Service has employed more than 20 people with a diverse range of disabilities and Palladium has provided the necessary reasonable adjustments to ensure their full participation in work life at Palladium. Over the past four years, the team has assisted more than 35 external organisations and multiple Palladium managed international development programs to fulfil their access and inclusion goals.

3. International disability equity and rights priorities

In early December 2023, Palladium hosted a disability roundtable discussion in Canberra with stakeholders in the disability sector to discuss enablers and barriers for disability access and inclusion in development programs. Key priorities identified from this roundtable are included in our recommendations below.

Meaningful partnerships with people with disabilities that represent the diversity that exists to enable co-design and maximise positive impact. It is critical that we truly understand the experiences of people with disabilities at the local level. Addressing barriers to the inclusion of people with disabilities requires intersectional analysis and meaningful engagement with diverse people with disabilities in all the communities we work. Partnerships with **organisations of persons with disabilities (OPDs)** is a critical priority to ensuring equity is being reflected as it is understood in the local context. There must be **clear, well-resourced and long-term partnerships with OPDs** to ensure that they can be a part of development program design, implementation and evaluation. Partnerships should aim not just to support DFAT funded development programs, but also to support OPDs to build and deliver on their own strategic direction and internal capacity, at their own pace. DFAT can also play an active role in supporting the **networking and connection of OPDs** to other

¹ World Health Organisation (WHO). 2011. *World Report on Disability*. Geneva, Switzerland: WHO and World Bank.

² CBM. 2012. *Inclusion made easy*. Retrieved from https://www.cbm.org/fileadmin/user_upload/Publications/cbm_inclusion_made_easy_a_quick_guide_to_disability_in_development.pdf.

disability led organisations and movements so that the sector can work more collaboratively towards shared goals.

Improve mainstreaming of disability equity and rights in climate resilience, humanitarian relief, disasters and conflict, infrastructure and technology. Solutions must be forward thinking to recognise what the world will look like in 20 years. It will be vital to capture lessons learned in mainstreaming of disability equity and rights across sectors, particularly climate resilience, as we are learning what inclusive climate resilience programs look like. There needs to be a greater emphasis on the role technology plays, as a key enabler in improving access for people with disabilities across all development investments, including the design phase (and early implementation) of development programs. DFAT must promote a greater uptake of new technologies to improve digital accessibility and set mandatory requirements for all development programs to have digital content that adheres to Web Content Accessibility 2.2 AA standards.

Commit to long-term reform for inclusive educational settings. While many gains have been made with inclusive education, children with disabilities remain as being less likely to complete education compared to children without disabilities and they comprise 15% of all out-of-school children.³ Teacher training, accessible infrastructure, adequate funding, access to assistive devices and professionals and updating assessment processes will be key in the reform process. This commitment to re-form needs to continue to tertiary and skills development programs to ensure people with disabilities can develop skills and gain qualifications to gain employment and/or start a business. DFAT-funded and Palladium managed, Australia Awards South Asia and Mongolia (AASAM) program has established an Alumni Disability Advisory Group (ADAG) which includes people with disability who have returned to their home country after completing their AASAM scholarship in Australia. ADAG provides specific advice to the AASAM in-country teams to reduce barriers that are inhibiting people with disabilities from accessing the scholarship opportunities. Changes that ADAG have implemented include upskilling English Language Trainer Providers so that they can provide English training to people with disabilities, providing information sessions to OPDs and mentoring people with disabilities with their application and interview process.

Evidence based programming and adequate disability data collection. People with disabilities being excluded from development programs has often been underpinned by the lack of reliable data about disability. Data collection should include both the collection of specific data on disability, such as disability prevalence, restrictions to participation and the barriers to inclusion that people with disabilities face, as well as how context affects data collection and which methods are most appropriate for individual contexts.³ Using the Washington Group (WG) Questions to identify disability in a culturally sensitive way is useful, but there is a need for more guidance in how to interpret and use the answers to the WG Questions. DFAT's Pathways Program, managed by Palladium in Philippines, has created a Disability Information Management System (DIMS) to ensure adequate collection of disability disaggregated data and measure impact of quality-of-life outcomes for participants with disability. The DIMS has enabled program staff to continuously learn and adapt their access and inclusion processes. DFAT must support national government systems to be able to understand and implement new methods and processes for disability data analysis and reporting.

Mandate minimum standards and earmarked funding for disability equity. All in-country development programs with a \$3 million investment or over, should include end of program outcomes that have a disability equity and rights objective. Furthermore, 80% of development programs must

³ Global Education Monitoring Report Team (2020). Global Education Monitoring Report, 2020: Inclusion and education: all means all, Paris: UNESCO.

effectively address disability equity. By enhancing the accountability of development programs, development partners will have to include adequate resourcing for disability and increase their engagement and employment of people with disabilities. By creating these accountability measures, the international development program will be aligned to key recommendations from the Australian Disability Royal Commission (2023) particularly around open employment for people with disability and assist Australia to fulfil its National Disability Strategy (2021-2031).

Including people with disabilities within development programs is significantly more cost effective than the long-term economic impact of exclusion. According to the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee Disability Policy Marker, 10% of Australia's Official Development Assistance (ODA) should be allocated to initiatives with disability equity as a principal objective by 2030.⁴ This would require DFAT to increase its central disability allocation to \$20m per annum with annual increases in line with overall budget increases. Project funding for disability must consider different disabilities to ensure that any reasonable adjustments or accommodations can be provided to enable their equitable participation. This can be achieved by having a dedicated percentage of a program budget allocated for reasonable adjustments – e.g., at least 2% on an overall program budget.

Capacity building of DFAT staff and development actors in both disability equity and rights and pragmatic approaches to inclusion will improve the knowledge and skills of development partners to achieve disability equity within the programs they manage. DFAT can advocate for inclusivity at the diplomatic level and offer support and investment to partner governments to also employ people with disabilities within their ministry departments, as well influencing their national disability action plans and strategies and mainstreaming disability to all policies and strategies. A key enabler for this is inclusive recruitment within DFAT and Post and to have people with disabilities represented as DFAT staff. Adopting, socialising and training DFAT and development partners on the **preconditions for inclusion** as identified by the Pacific Disability Forum, across all development programs, regardless of sector, will also create a foundation for successful mainstreaming of disability equity work.

4. Effective approaches for achieving disability equity and rights globally

Approaches to disability are important to consider when designing and implementing disability inclusion strategies and actions. In the past, some approaches to disability inclusion have included the medical and charity model which focused on 'fixing' a person's impairment and conceptualises people with disabilities as passive recipients of care. Aligned to the CRPD, the **social and rights-based approach**, rather, identifies and focusses interventions on the barriers that exist in society. Using this approach can result in the fulfilment of people with disabilities to access their rights in society on an equal basis with others.

Disability inclusion within development programs should be **considered both a process and an outcome**. The process is about ensuring that people with disabilities participate fully and are co-design partners, and the outcome is that the benefits of the program are the same for people with disabilities as anyone else who accesses the program. This can be achieved by adopting the **twin-**

⁴ Commonwealth of Australia, DFAT, Australia's Official Development Assistance, Statistical Summary, 2020—21. Published by the Department of Foreign Affairs and Trade, Canberra, February 2022. Accessed here: [Official development assistance \(ODA\) - OECD](#).

track approach. The twin-track approach promotes concurrent action across two broad set of initiatives:

- Disability specific activities that are targeted directly for people with disability; and
- Disability inclusive ‘mainstreaming’ activities that ensure all development programs include a disability perspective and are fully accessibility to all people with disabilities (disability is cross-cutting).

Considering disability from an **intersectional approach** is also critical in recognising the multiple and layered identities that people with disability have. Using an intersectional approach enables DFAT and development partners to acknowledge that people can be members of more than one community and have more than one identity at any one time. The new strategy must include other forms of diversity that exists within the disability community, **such as gender, LGBTIQA-plus and ethnicity**. There must be careful consideration of equity for people with disabilities both as part of and separate to overall Gender, Disability and Social Inclusion (GEDSI) approaches.

Australia’s approach to disability inclusion should be **aligned across all levels of foreign and domestic policy** and implemented at all levels with partner governments. A way to perhaps better coordinate Australia’s work in disability inclusion would be to create a focal point at the country level who acts as a facilitation mechanism between government agencies and disability organisation. DFAT-funded and Palladium managed, Sri Lanka Skills for Inclusive Growth Program (S4IG), has worked collaboratively with Sri Lanka’s Tertiary and Vocational Education Commission (TVEC), to ensure that people with disabilities receive fair and equal treatment during training and assessment. This has resulted in systemic change to the TVEC Circular that now requires all public and private training providers to provide reasonable adjustments for people with disabilities.

5. Opportunities for advancing disability equity and rights

There remains a challenge of disability being absorbed within the overarching GEDSI model and to a lack of resourcing for disability specific skillsets within DFAT and development partners. While disability is intrinsically linked to gender and other areas of social inclusion, it does require its own specialised skillsets. Development programs should include specialists that represent all areas of social inclusion, rather than just one overarching ‘GEDSI’ specialist, whilst ensuring that the siloed approach of the past is minimised.

The 2030 new universal Agenda⁵ and the ambition to achieve sustainable development could lead to rushed and expensive mistakes, such as people with disabilities not being included in mainstreaming initiatives and nonadherence to the ‘do no harm’ approach. The opportunity exists now to ensure that people with disability are at the forefront of climate resilience, infrastructure, humanitarian relief and technology decisions and solutions. This could set the gold standard globally and be adopted by development agencies across the world.

⁵ [Transforming our world: the 2030 Agenda for Sustainable Development | Department of Economic and Social Affairs \(un.org\)](https://www.un.org/sustainabledevelopment/)