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## Guidance

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# Disability Inclusion Guidance for Companies



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## About the authors

This guidance note was developed by Social Development Direct, a leading provider of high-quality, innovative and expert social development assistance and research services. We work to build inclusive societies in which people in all of their diversity are valued and empowered to make choices about their own development. The authors are Jessie Meaney-Davis (Social Development Direct); Mostafa Attia (Independent Consultant); Sue Coe (Independent Consultant); Erika Fraser (Social Development Direct); and Richard Scott (Independent Consultant). The following people provided valuable contributions: Shashaank Awasthi (V-Shesh); Simon Brown (Sightsavers International); Kazem Hemeida (Humanity and Inclusion); Asha Hans (Shanta Memorial Rehabilitation Centre); Maha Helali (Advance Organisation for People with Autism); Lizzie Kiama (This Ability); Francesca Randazzo (Humanity and Inclusion).

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## Disability Inclusion Guidance for Companies

This guidance note is designed to help companies familiarise themselves with the topic of disability inclusion and provide some key steps to become more disability inclusive. It is not intended to be a detailed technical guidance document. Further technical guidance can be found under the list of reference materials at the end of the disability inclusion [topic note](#). This note begins with a brief introduction to disability inclusion, before outlining the core elements of a disability-inclusive company. The note also provides examples of barriers to disability inclusion and some ways to address them. It shares case studies of the journeys of two CDC investee companies in addressing disability inclusion and a notable example from one of CDC's markets.

### Who are people with disabilities?

- There are more than [one billion](#) people with disabilities worldwide.
- [80 per cent](#) of people with disabilities live in low- and middle-income countries.
- People with disabilities are people who have long-term physical, mental, intellectual or sensory impairments and who experience societal barriers that hinder their full, equal and effective participation in society ([UNCRPD, 2006](#)).
- People with disabilities, especially women with disabilities, are [less likely to be employed](#) than people without disabilities, due to various barriers to their inclusion that society creates. People with disabilities from other socially excluded groups are also likely to experience further discrimination.
- Products and services are often not designed to include people with disabilities as customers, which can limit people with disabilities' full and equal participation in all aspects of life and limit a company's profitability and sustainability by not reaching a [growing segment of customers](#).
- Excluding people with disabilities from the labour force in low- and middle-income countries is estimated to result in [GDP losses of between 3 to 7 per cent](#).

### Why address disability inclusion?

- People with disabilities have the right to work and participate fully in all aspects of life on an equal basis with others.
- The [United Nations Convention on the Rights of Persons with Disabilities](#) (UNCRPD) prohibits discrimination against people with disabilities, and many countries have legislation that prohibits discrimination against people with disabilities, enforces employment quotas and regulates accessibility.
- People with disabilities and their families are an overlooked market segment. Their number is [dramatically increasing](#) as populations age and medical advances reduce mortality rates of previously life-ending conditions.
- As employees and managers, people with disabilities can bring valuable skills, experience and perspectives to a company and [increase company productivity](#).
- Making products and services accessible to and inclusive of people with disabilities can broaden a company's customer base and drive innovative product and service design.
- Including people with disabilities across a company's operations can improve brand reputation, improve staff wellbeing (many disabilities are invisible), minimise legal and operational risks, and improve sustainability.

### Important points to remember when addressing disability inclusion:

- People with disabilities are a very diverse group of individuals with varying impairments, experiences, and intersecting identities with gender, age, ethnicity and sexuality.
- Companies should, as a minimum, operate in compliance with national policies and legal frameworks relating to people with disabilities, employment, and accessibility as relevant to their operations, but preferably aim for 'good practice'.
- Many companies are innovating and adapting their operations to become disability-inclusive, and they often share what they have learned through [National Business and Disability Networks](#), organisations of persons with disabilities (OPDs, sometimes called DPOs), employer federations and other disability inclusion networks around the world. Ongoing engagement with people with disabilities, their representative organisations, and disability inclusion networks to assess, adapt and improve disability inclusion practices, is therefore important.

## Core elements of a disability-inclusive company

Commitment to disability inclusion from a company's board of directors and senior management is crucial for creating a supportive and inclusive organisational culture. Mandatory reporting on disability inclusion to the company's board can embed this leadership commitment.

Disability inclusion requires budgeting – though often not as much as many expect. Reasonable adjustment for employees, and universal design for customers, needs resourcing. Ideally, this budget should be managed by the senior leadership or board.



These should include commitments and actions for:

- All disability inclusion legislation that requires compliance: anti-discrimination laws, quota regulations, accessibility regulations, rehabilitation and return-to-work regulations.
- Disability accessibility measures and provisions for the company's operations, products, services and communications.
- Promotion of the inclusion of people with disabilities as equal and valued employees, customers, and service users.
- Prevention and response to discrimination, exploitation, abuse, harassment and violence against people with disabilities in company operations.
- Measurement and reporting on disability inclusion to company senior management and board.

This should be provided for all staff. Key topics to include in training are:

- Addressing conscious and unconscious discriminatory attitudes held by company employees towards persons with disabilities.
- The importance of anti-discrimination and associated laws and regulations, including quota regulations and accessibility regulations.
- Budgeting for disability inclusion and reasonable adjustment.
- Recruiting, managing, retaining and career development for people with disabilities.
- Accessibility and universal design, including accessible communications and digital accessibility.

## Barriers to disability inclusion

People with disabilities commonly experience many different types of barriers to their full and equal participation in society, including attitudinal barriers such as discrimination and stigma; institutional barriers such as discriminatory policies or a lack of staff understanding of disability inclusion; and environmental barriers such as physically inaccessible infrastructure or communications. It is the responsibility of governments, the private sector and civil society to reduce and remove the barriers that hinder people with disabilities' equal participation in society. Actively removing these barriers can lead to the inclusion and empowerment of people with disabilities in society and benefit companies.

### Examples of barriers that people with disabilities experience when interacting with companies

#### Attitudinal barriers



- Negative and discriminatory attitudes towards people with disabilities (both conscious and unconscious) by staff, management, customers and the general public.
- False assumptions about people with disabilities' wants and needs as employees, customers and service users.
- Negative assumptions about the capabilities of people with disabilities.
- Abuse, exploitation, harassment and violence against people with disabilities in the company's operations.
- Increased risks of sexual exploitation, abuse and harassment of women with disabilities, and people with disabilities from other socially excluded groups.
- Lower engagement with employment opportunities by people with disabilities, stemming from isolation, limited social networks and/or low self-confidence/self-esteem.
- Lack of trust by people with disabilities and/or their families that companies will accommodate them and keep them safe as employees or when using the company's products and services.

#### Institutional barriers



- Company staff, contractors and suppliers do not know how to adjust their work to be disability-inclusive or do not feel confident to recruit or engage with people with disabilities.
- Lack of inclusive education, vocational training or career development for some people with disabilities, especially women with disabilities, and likely people with disabilities from other socially excluded groups.
- Discriminatory, exploitative and/or absent company policies and procedures.
- Lack of data from people with disabilities to inform company operations and product or service design.
- Lack of procedures protecting confidentiality of people with disabilities' information.
- Lack of financial inclusion of people with disabilities, including limited access to bank accounts, financial services and insurance.

#### Environmental barriers



- The company's workplace, products and/or service facilities are inaccessible to people with different impairment types.
- The company's recruitment processes are inaccessible to people with different impairment types.
- Internal and external communications (including digital communications) are inaccessible to people with sensory and/or intellectual disabilities.
- Transport and public infrastructure are inaccessible and/or unsafe, especially for women with disabilities.

## Conducting a barrier analysis: an important early step for companies

Companies should identify the barriers to disability inclusion in their business operations, then plan and act to address these barriers, and regularly assess progress against their plans. Below are some examples of initial priority actions that should then be repeated and/or updated periodically, ongoing measures companies can take, and further ambitions for when the company has made some progress towards disability inclusion. The table below is an example only – your company's barrier analysis should be based on your local, social, corporate and legal context, and be completed together with people with disabilities (including employees and customers) and OPDs. The analysis must consider all types of barriers including attitudinal, environmental, and institutional barriers. Once the company has completed a barrier analysis, in a company disability inclusion strategy or action plan, it can prioritise which actions it will take, by when, who will implement them, and with what financial and technical resources. Progress against the strategy or plan should be regularly reviewed.



*A representative of the Uganda National Association of the Deaf speaking to an audience in sign language.  
Image credit: Robin Prime/Sightsavers*

## An example of a barrier analysis:

	<b>Measures to address attitudinal barriers</b>	<b>For example, negative attitudes, false assumptions, discrimination, exploitation, and abuse</b>
<b>Initial actions</b>	<ul style="list-style-type: none"> <li>– Senior managers communicate and role-model the company’s disability inclusion policy and stance on non-discrimination, internally and externally.</li> <li>– Provide disability inclusion training to key staff, leaders and line managers. Training should: challenge assumptions and negative attitudes towards people with disabilities; include information on national laws and company policies for disability inclusion; and provide guidance on <a href="#">accessibility</a> and <a href="#">universal design</a>. OPDs or other disability-focused organisations sometimes offer this training.</li> <li>– To prevent and address discrimination, exploitation and abuse, provide specific training for managers, and specific safeguarding support and training for employees who work in close proximity and/or have unsupervised time with people with disabilities.</li> <li>– Clearly base the company <a href="#">disability inclusion human resources (HR) procedures</a> on anti-discriminatory, inclusive, rights-based principles. Include commitments to people with disabilities receiving equal rates of pay and access to benefits, and adjusted benefits where necessary, for example adjusted health insurance and/or parental leave. Check that insurance providers do not have blanket or general policies of refusing to provide insurance or only providing insurance on certain terms to people with disabilities.</li> <li>– <a href="#">Define procedures</a> for negotiating reasonable adjustments for employees with disabilities.</li> <li>– Ask employees with disabilities about their experiences of inclusion and/or exclusion in the company.</li> <li>– Work with employees with disabilities, OPDs and organisations of women with disabilities to inform and check that safeguarding and grievance mechanisms are <a href="#">safe and accessible</a> to people with disabilities, and identify networks that can support people with disabilities in complaints and investigations. Ensure people with disabilities know how to report concerns about safeguarding.</li> </ul>	
<b>Ongoing efforts</b>	<ul style="list-style-type: none"> <li>– Regularly engage with people with disabilities and OPDs to increase staff exposure to, and awareness of, people with disabilities, train staff, help recruit and retain people with disabilities, and share job advertisements.</li> <li>– Provide disability inclusion training to all staff. Training should: challenge assumptions and negative attitudes towards people with disabilities; include information on national laws and company policies for disability inclusion; and provide guidance on <a href="#">accessibility</a> and <a href="#">universal design</a>. OPDs or other disability-focused organisations sometimes offer this training.</li> <li>– During recruitment, focus on candidate skills and abilities. Do not assume that a person with a disability cannot do a job. Include disability as a positive selection factor in recruitment criteria.</li> <li>– Include a standard statement in all job advertisements encouraging people with disabilities to apply.</li> <li>– Conduct market research with people with disabilities to understand what they want and need from products and services, rather than assuming products and services are appropriate for everyone.</li> </ul>	
<b>Further ambition</b>	<ul style="list-style-type: none"> <li>– Make people with disabilities highly visible in internal and external communications as valued colleagues, customers, and citizens.</li> <li>– Provide disability inclusion training to contractors and suppliers. Training should: challenge assumptions and negative attitudes towards people with disabilities; include information on national laws and company policies for disability inclusion; and provide guidance on <a href="#">accessibility</a> and <a href="#">universal design</a>. OPDs or other disability-focused organisations sometimes offer this training.</li> </ul>	





## Measures to address institutional barriers

For example, discriminatory, exploitative and/or absent company policies and procedures; a lack of understanding of or confidence in disability inclusion; a lack of inclusive education, training, and career development opportunities

### Initial actions

- Regularly assess company compliance with all national disability legislation, including anti-discrimination laws, [quota regulations](#), accessibility regulations and rehabilitation and return-to-work regulations, and assess adherence to company disability inclusion policies and procedures.
- Ensure all health and safety procedures and evacuation plans are accessible to people with disabilities, that information about them is provided in [accessible formats](#), and that they are understood by all employees with disabilities.
- Train managers on [recruiting, managing and career development](#) for employees with disabilities.
- Include procedures for ensuring confidentiality of a person’s diagnoses and health status in the company’s HR and disability inclusion policies.
- Commit to ethically collecting and storing disability-disaggregated data in workplace and marketplace data collection.
- Allow accessibility provisions in contracts awarded to contractors and suppliers to enable them to employ persons with disabilities and/or provide accessible products and services without financial penalty.

### Ongoing efforts

- Regularly engage with people with disabilities, OPDs, [National Business and Disability Networks](#) and/or other disability inclusion networks to build staff’s understanding of disability inclusion, to assess and update the company’s policies and procedures, and to develop a [disability-confident employer](#) strategy.
- Implement return-to-work policies or programmes for employees who acquire a disability while at work.
- Support flexible working arrangements (e.g., working from home, adjusted hours) for all staff, including people with disabilities.

### Further ambition

- Commit to [providing professional coaching, mentoring, job shadowing, work experience programmes and customised training](#) for employees with disabilities.
- Partner with education and vocational training institutes to promote opportunities for people with disabilities to develop skills for employment.
- Keep contractors, suppliers and buyers informed of the company’s policies, procedures, and ambitions for disability inclusion, and introduce them to disability inclusion partners and networks.
- Collaborate with governments, [National Business and Disability Networks](#), OPDs and other disability inclusion networks to collate and analyse disability-disaggregated data.



## Measures to address environmental barriers

For example, physically inaccessible workplaces, products, services and communications

<b>Initial actions</b>	<ul style="list-style-type: none"><li>– Work with people with disabilities, OPDs and/or disability inclusion networks to conduct regular <a href="#">accessibility audits</a>, develop action plans, and monitor and evaluate progress.</li><li>– Provide some <a href="#">accessible working space</a> including work areas, toilet(s), work break areas, meeting room(s). Commit to making all working environments and rest areas accessible as budget and phasing allows.</li><li>– Establish a central budget for accessibility, reasonable adjustments and universal design of products and services.</li><li>– Commit to all products, services, <a href="#">events</a>, and internal and external communications being accessible to people with disabilities. Include this commitment in the company disability inclusion policy and define procedures.</li><li>– Where possible, use contractors with expertise in <a href="#">accessibility, including accessible information and communication technologies</a>.</li><li>– Consider providing transportation to/from work for staff with disabilities and other staff, where public transport is not feasible and/or safe for people with disabilities, women, and other employees. This can be funded through the company's central disability inclusion budget or a broader diversity and inclusion budget.</li></ul>
<b>Ongoing efforts</b>	<ul style="list-style-type: none"><li>– As standard preparation for all recruitment, training, events and market research, explain the process for the activity, ask all participants if they have any accessibility requirements and provide for these requirements.</li><li>– Keep updated lists of relevant accessibility suppliers, e.g., sign language interpreters, accessible equipment suppliers.</li><li>– Always involve individual employees with disabilities in identifying their specific <a href="#">reasonable adjustments</a>. Also consult with workers' representatives and co-workers on any substantial adjustments to be made.</li></ul>
<b>Further ambition</b>	<ul style="list-style-type: none"><li>– Expand and maintain lists of relevant accessibility suppliers.</li><li>– Build internal expertise in <a href="#">accessible information and communication technologies</a>.</li></ul>



A woman with a visual impairment navigating her local environment.  
Image credit: Dominique Cotton/Sightsavers

## Three companies' journeys towards disability inclusion

### Infinity and Phoenix Energy's, solar energy project construction, Egypt

#### Proactive disability inclusion strengthens relationships between construction company and local communities

The Egyptian government legally requires 5 per cent of all company employees to be people with disabilities. But many companies do not comply with this law and instead elect to pay the regulatory fine, thereby denying the rights of people with disabilities. In contrast, Infinity has strived to be an equal opportunity employer, routinely employing people with disabilities as part of its company culture.

Benban Solar Park near Aswan, Egypt – made up of 32 solar power plants – was one of the largest solar projects in the world at the time of its construction. In 2017, CDC financed nine of these power plants – one of these being Phoenix Power 1, which is owned by Infinity and Phoenix Energy.

When one of the subcontractors for Phoenix Power 1 expressed its desire to ensure that people with disabilities from the local communities surrounding the project were part of their construction workforce, Infinity was delighted to support them. Phoenix Power 1 was keen to ensure good quality, supportive relationships with local communities in this remote part of Egypt. A disability-inclusive workforce was an important part of its approach to achieve this, especially as job opportunities were very limited for members of the four villages living near the project location.

Phoenix Power 1 and its contractors worked with the local Government Labour Office to identify and proactively recruit people with disabilities, including people with intellectual and physical impairments.

Phoenix Power 1's contractor thoughtfully implemented a range of measures to include persons with disabilities it employed, including:

- Adapted work task selection, induction, and supervision processes to suit the skills and capacities of the employees with disabilities. Care was taken to ensure they understood their tasks (mainly solar panel and component assembly carried out on site) and quality standard expected of their work.
- Employees with disabilities were located close to the site management office, working in a shaded area to be more comfortable in the heat and allow them greater access to supervision and support.
- Access to ground level toilet facilities in the site management offices.
- Provision of free transportation from their homes to the construction site – a benefit offered to employees without disabilities too.
- Placing employees with disabilities on the same pay scales as employees without disabilities for fair and equitable remuneration.

The employment of local people with disabilities helped in strengthening the relationship between Phoenix Power 1 and the local community. Both Phoenix Energy and Infinity are pleased with the process and outcome. Infinity felt that the experience of taking steps to be more disability-inclusive reflected its wider company culture of offering equal opportunities. Infinity already employed persons with disabilities within its management team – a very positive experience for them.

## Safaricom, Kenya

### Engaging with people with disabilities to make products and services accessible

Safaricom is not currently a CDC investee company, however it is a major technology company in Kenya, a key market for CDC, and a great example of a company taking a proactive approach to disability inclusion. Safaricom decided to work towards disability inclusion to boost innovation in accessible products and help advance the United Nations' Sustainable Development Goals, recognising that people with disabilities are disproportionately affected by poverty. The company seeks to include people with disabilities as employees, customers and service users.

In 2017, Safaricom conducted an audit of all its products and services to understand the extent to which they were being used by people with disabilities, and it found that people with visual impairments were particularly excluded from the benefits of technology. Only 5 per cent of all published works are available in formats accessible to people with visual impairments, according to the UN World Intellectual Property Organisation. Safaricom conducted research with people with visual impairments to understand the barriers and how they interacted with their mobile money service. It found that the service was inaccessible, which left people with visual impairments at risk of being defrauded, spending more than necessary on transactions, and unable to use the service without assistance.

Safaricom decided to integrate an interactive voice response into the product, which 3,000 customers access daily. The Safaricom website was one of the first in Kenya to be fully accessible to people with disabilities. The product also includes mechanisms that allow Safaricom to know if a customer calling has a disability or accessibility requirement, and staff members interact with them according to their accessibility requirements, for example a section of staff use Kenyan Sign Language. Safaricom accommodates for staff with disabilities with accessible workstations, bathrooms and assistive equipment required for them to perform their work, as well as providing support for training and career development.

Safaricom has also made people with disabilities visible in its external communications and promoted the inclusion of people with disabilities in society more broadly by supporting an initiative called "Open Your Eyes Kenya", which aims to raise awareness of the challenges and barriers that people with visual impairments experience.

## BigBasket, national online groceries provider, India

### Employing people with disabilities fits BigBasket's company ethos and helps it meet staffing needs

BigBasket is India's largest online grocery store stocking over 18,000 products across more than 1,000 brands, delivering to customers nationwide. It prides itself on selling high quality goods and delivering them on time to their customers. CDC invested a total of USD 41.78 million in Big Basket in 2019 and 2020.

BigBasket has strong people-driven values in its business model. Disability inclusion is a natural part of this ethos. Commitment to disability inclusion by senior management is an important underpinning principle – they expect it to happen. Disability inclusion also helps in diversifying the workforce and enables access to a larger talent pool.

As of December 2020, BigBasket employs 460 staff with disabilities in its business teams across India, representing just over 2 per cent of the total workforce. BigBasket plan to increase numbers of staff with disabilities in the future.

BigBasket started its disability inclusion journey by considering the most appropriate areas of its business to increase staff members with disabilities.

Successfully recruited candidates with disabilities are placed into adjusted induction processes to suit their impairment needs. Examples of adaptations include longer induction timeframes (12 days instead of the usual five days), adjusted content, user-paced learning and regular monitoring from link-support Human Resource (HR) staff, usually the same staff that have provided the induction

Support to staff with disabilities does not end at completion of the induction process. The handover to operations from training is carefully carried out, with HR managers communicating key issues so staff with disabilities receive continuous support. Ongoing communication and support to staff with disabilities by BigBasket HR staff ensures their impairment and other employee needs are met and supported by the business. Social needs of employees are considered as well – ensuring integration of staff with disabilities into the company's social activities such as the regular "fun Fridays" for all staff. This helps remove barriers between staff with and without disabilities, and also helps reduce isolation that could be felt by staff with disabilities.

As a result, BigBasket generally enjoys high staff retention rates from its employees with disabilities – in keeping with a general high staff retention rate throughout the business.

BigBasket happily recommends its experience of employing people with disabilities to others. It recommends that other companies:

- ensure they have leadership support for disability inclusion;
- set up a framework for recruiting and retaining staff with disabilities;
- sensitise existing employees about disability inclusion;
- ensure there is ongoing support for employees with disabilities; and
- develop a conducive environment to help them succeed in their roles.

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## Glossary of key disability inclusion terms:

### **Accessibility**

The extent to which people with disabilities can access products, services, facilities, information, communications, and/or environments, on an equal basis with others.

### **Impairment**

A physical or mental condition that causes or is likely to cause a loss or difference of a physiological or psychological function.

### **OPDs or DPOs**

Organisations of People with Disabilities, which are run by and for people with disabilities. Sometimes referred to as Disabled People's Organisations.

### **People with disabilities**

People 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.

### **Reasonable accommodation/adjustment**

Necessary and appropriate modifications or adjustments that do not impose a disproportionate or undue burden, where they are needed in a particular case, to ensure people with disabilities' participation and benefit on an equal basis with others.

### **Universal design**

The design of products, environments, programmes, and services to be usable by all people to the greatest extent possible, without the need for adaptation or specialised design.

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## Acronyms

<b>DFAT</b>	Department of Foreign Affairs and Trade, Australia
<b>DPO</b>	Disabled People's Organisation
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labour Organisation
<b>OPD</b>	Organisation of People with Disabilities
<b>UNCRPD</b>	The United Nations Convention on the Rights of Persons with Disabilities, which is an international, legally binding instrument for the human rights of people with disabilities.
<b>WCAG</b>	Web Content Accessibility Guidelines



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