Pacific Disability Forum Submission
to Australia's International Disability Equity & Rights Strategy

January 2024

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'Inclusion can ensure we have a seat at the table, but it is equity that will transform and reconfigure that table to guarantee our full, effective and meaningful participation.' – Setareki Macanawai, CEO, Pacific Disability Forum.

Introduction

Disability inclusion has been on the agenda for our region since 2009. Since that time, we have seen progress in many areas. Many mainstream development donors and investments now have disability inclusion policies or strategies. We congratulate and thank the Australian Government for leading the way in this area since its first *Development for All* strategy, and its successor, and are pleased to have this opportunity to provide our recommendations to strengthen the direction of DFAT's new International Disability Equity and Rights Strategy (IDEARS).

There have been **pockets of success** for disability inclusion over the past decade and a half, in areas such as inclusive education, inclusive WASH, the emergence and strengthening of Organisations of Persons with Disabilities (OPDs), disaster risk reduction and the ratification of the CRPD by now 14[1] Pacific Island Country (PIC) governments. However, **we are not on track to achieving the Sustainable Development Goals or the Convention on the Rights of Persons with Disabilities (CRPD)** for people with disabilities in our region.

Success has come where **disability is explicitly targeted** as an area requiring specialised attention, technical advice, and investment. There have been many good practices in this regard, including DFAT's dedicated partnerships and commitment to disability-specific research, evidence, and technical expertise as well as capacity development for organisation of persons with disabilities (OPDs). We are concerned, though, that the development sectors' **increasing shift towards broader 'GEDSI' will blunt the cutting edge of DFAT's dedicated focus to disability**. If the unique barriers and disadvantages faced by people with disabilities are only considered superficially, amongst a myriad of competing interests, then the deeper, substantive change required to achieve equity and rights for such persons will not progress.

There has also been success where **the twin track approach** has been consistently applied both within **programming** (programs that include both mainstream and disability specific activities, such as reasonable accommodations and engagement with OPDs), as well as on the **national / regional scale** (ensuring investment within mainstream policies and initiatives

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[1] Australia, Cook Island, Fiji, Federated States of Micronesia, Kiribati, Marshall Islands, Nauru, New Zealand, Palau, Papua New Guinea, Samoa, Solomon Island, Tuvalu, Vanuatu

as well as disability-specific efforts).[2] There is more visible uptake of disability-specific actions at a programming level. While progress on a national level is commendable there are considerable gaps. These can be seen particularly in relation to the four disability-specific aspects of national/regional policy that the Special Rapporteur for Disability names as 'prerequisites' for PICs: **accessibility,[3] assistive devices, support services and non-discrimination.** We have added to these two further aspects that are essential for people with disabilities to be able to access services and participate in everyday life: **social protection payments**, including particularly disability-specific payments to cover the additional costs of disability; and **community based inclusive development**, to ensure access and connection to essential services particularly given the unique geographical spread of PICs. We call these six aspects the preconditions for inclusion.

The **precondition for inclusion** provides an essential policy framework that should be applied across the IDEAR strategy and wider DFAT program**. We believe that this, rather than a sectoral approach, is the best way to build on the progress made by DFAT over the last fifteen years and ensure a much stronger foundation for achieving equity and rights.**

This systemic approach, catalysing and nurturing institutional change, is a key way forward from hereon. For example, disaggregated data collection efforts have been strengthened considerably through DFAT support and programming. As with the preconditions, the opportunity now is to ensure that **this translates across to national government** and supports them to do the same through national censuses and also beyond – investing in in health information management systems, household surveys, labour force survey etc., to understand better the gaps and challenges for the participation of people with disabilities. Similarly, with resourcing we look to DFAT not only to fund disability inclusive investments, but to help our national governments improve their financial management systems, allocation processes and transparency to facilitate disability rights in national government budgets. These are crucial, systemic changes that will increase national level independence and sustainability for both government and the disability movement. Of particular noting is DFAT's budget support to PICS to ensure that it has specific disability indicators.

An area that has seen much development in recent years is **organisational strengthening for OPDs**. While DFAT's investment in this is exciting, we also want to ensure that this can be delivered in a way that is **sustainable for the OPDs, fit for purpose,** and overall achieves equity and rights. The disability community is diverse and complex, serving a broad range of purpose and people from very wide-ranging backgrounds and experiences. More targeted focus is needed to ensure that **underrepresented groups within the disability community** are specifically supported and meaningfully engaged in decision-making processes. This includes the Deaf community, people with intellectual disabilities and psychosocial disabilities, and people with multiple disabilities and high support needs. While the disability movement has grown considerably in the last decade, and there is improved representation of those more marginalised, considerable work remains in this regard. **We are particularly concerned that increased focus on a blanket GEDSI approach will erase some of the gains** made in recent years and further marginalise those needing a specific focus to realise their rights.

As with many other aspects, the solution to this is **retaining a strong and specialised focus on disability, both within mainstream and targeted investments**. We urge DFAT to ensure the IDEARS makes it clear that DFAT is dedicated to achieving disability equity

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[2] Examples of this include DFAT's focus on OPD strengthening, built environment accessibility guidelines and CRPD harmonisation initiatives.

[3] There has been good progress in guidelines for accessibility of the built environment, but less so in the adaptation, implementation, and resourcing of these on national levels. There is also much work to go on accessibility for ICT and transport.

and rights, not just as a phrase, but as a meaningful outcome for people with disabilities in the Pacific.

How to ensure Disability Equity and Rights

We welcome DFAT's shift from the language of disability inclusion to Disability Equity and Rights within this upcoming strategy. We see this as a meaningful change as it speaks to DFAT's commitment to **achieving justice for all people with disabilities**. We want to see this translate **beyond words** to **tangible actions and outcomes** that lead to a robust strategy with a higher standard of **accountability** for progress made towards realising our rights and achieving **specific and measurable change.**

In our view, while disability inclusion is important, by itself it does not lead to transformative and sustainable outcomes for all people with disabilities. This is because:

- **Disability inclusion can at times be tokenistic**, including people with disabilities in processes such as consultations but not meaningfully taking on board our participation and contributions. This means that our needs and experiences do not meaningfully inform programs and policies, although duty-bearers will treat and evaluate their investments as if they do because people with disabilities have been 'consulted'.

- **Disability inclusion often only includes a partial representation of people with disabilities**. Many groups of people with disabilities experience higher levels of discrimination and exclusion, such as people with psychosocial and intellectual disabilities and deaf people. There are also people with disabilities who experience exclusion through other forms of disadvantage on top of their disability, such as women and children with disabilities, those who live in rural and remote areas and persons with disabilities with intersecting identities such as LGBTQI and indigenous. Disability inclusion processes may be seen to succeed where it includes many people with disabilities, yet those most at risk of exclusion may continue to fall through cracks due to the higher systemic disadvantages they face.

- **Disability inclusion processes can focus on individual inclusive programs and investments, without considering how inclusion in these depends upon an inclusive and equitable context and environment**. For example, a fully inclusive primary school will only be accessible to children with disabilities if they also have access to other factors such as (depending on the child): assistive devices, support services and workers, sign language interpreters, disability social protection benefits to pay for the additional costs of their medication or accessible transport to school, CBID to facilitate their early identification, assessment and referrals, an accessible town and infrastructure so that they can travel to school, and non-discrimination law and awareness raising to ensure they can access reasonable accommodations in the school and their right to education, and to counter stigma and negative attitudes by peers and staff.

Core Elements of Disability Equity and Rights

Equity goes further than inclusion, to ensure we examine:

- **Resourcing** and whether or not this is available, appropriate, and sufficient to achieve justice for people with disabilities.

- **Coverage** and whether or not this is adequately reaching those facing the highest and multiple layers of exclusion.

- **Reach** and whether or not this is sufficiently meeting the unique needs of different individuals of people with disabilities – including those with under-represented impairment types, or those with high support needs.

- **Data,** that looks beyond quantitative outputs of inclusion, and examines whether or not there are indications that outcomes of equity and access to rights are meaningfully being achieved for all people with disabilities.

- **The full picture** and whether or not there are underlying drivers of exclusion that call for broader, systemic change to enable access to rights rather than siloed efforts for inclusion.

Disability inclusion may raise these questions, but equity insists they be adequately answered.

Recommendations and Discussion

1. Preconditions for Inclusion

Overarching recommendation: DFAT should follow a disability inclusive policy framework approach along the lines first proposed by the Special Rapporteur for People with Disability and meaningfully embed 'preconditions to inclusion' as a central structure of the IDEARS.

The pre-condition for inclusion provides a policy framework that must be systemically addressed to achieve disability equity. They are indispensable to the inclusion and participation of people with disabilities. It is important to understand that these elements are **not** a list of sectors or programming areas, rather, they are aspects that must be addressed through **national and regional policy structures and frameworks**. Together, they are the **'first steps'** that must be taken to ensure that people with disabilities can **access and participate in all aspects of everyday life,** and **across all sectoral areas.**

While good progress has been made in many areas of disability inclusive development over the past five years people with disabilities continue to face disadvantage and barriers in all aspects of life. We urge that this is, at least in part, because disability mainstreaming has not been **matched with adequate attention to the necessary and specific prerequisites for inclusion** which would *enable* people with disabilities to participate more easily in inclusive mainstream programs.

The IDEARS cannot continue this pattern. We strongly recommend that **DFAT follow the disability-inclusive policy framework approach and meaningfully embed 'preconditions to inclusion' as central to the structure of the IDEARS**. This would involve recognising the importance of establishing frameworks for the preconditions to inclusion as a first step to all further programming and service delivery.

DFAT also has a strong opportunity to leverage policy dialogue with partner governments and multilateral partners to emphasise the significance of adopting the preconditions as a conceptual framework and actively addressing them for real and substantial change. Australia can take a galvanising role by **harnessing international support for the preconditions.**

Critical areas for the inclusion and participation of people with disabilities such as accessibility to ICT, transport and the build environment, availability and affordability of quality assistive products and technology, health, deinstitutionalisation, and

rethinking support services, including innovative models, are all opportunities for Australia to show thought and regional leadership.

There are also specific opportunities for Australia to make change under each of the preconditions, as follows:

Accessibility

1.1 Recommend the official endorsement of the Regional Accessibility Standards on the Built Environment by PIF, and support PICS to adopt these within national regulatory frameworks.

1.2 Train national delegations of professionals, OPDs, and government representatives (particularly at the sub-national level) on how to use and monitor the Regional Accessibility Standards on the Built Environment.

1.3 Develop a regional process for monitoring the implementation of the Regional Accessibility Standards on the Built Environment by PICs, involving OPD representatives, government, and other key stakeholders.

1.4 Establish a regional taskforce to identify and mobilise action on strategic opportunities for accelerating accessible transport and infrastructure in the Pacific, building upon the analysis and recommendations in the Pacific Regional Infrastructure Facility report, *Improving Accessibility in Transport Infrastructure Projects in the Pacific Islands.*

1.5 Commission a report to undertake a situational analysis and outline regional Information and Communications Technology (ICT) accessibility standards for the Pacific, which could then be tailored by countries when developing their own national standards.

Assistive Products and Technology

1.6 Review existing tax regulations and promote exemptions or concessions for assistive products and technology across the region.

1.7 Establish a regional procurement facility, in line with the recommendations of the WHO *Assistive Technology Procurement Study*, to address shortage of quality and affordable assistive products and technology across the region.

1.8 Develop support from national governments and partners for training for multi-disciplinary personnel in relation to assistive products and technology, and integrated health and rehabilitation services, to ensure improved access and safe and appropriate use by people with disabilities.

Support Services

1.9 Recognising the extensive lack of support services in the region, commission a regional report to provide a situational analysis regarding what support services across the Pacific, what currently exist and what they need to involve to enable daily living and inclusion for people with disabilities and provide clear recommendations for next steps to deliver concrete and systemic changes required to progress this sector.

1.10 Invest in a pilot program that can be scalable to implement the recommendations of this regional support services report.

Community-Based Inclusive Development

1.11 Support an initiative to identify a new action plan and budget commitment to continue strengthening CBID in the Pacific, focused on particular barriers such as resourcing, improving coordination between government ministries, accessing regional and remote areas, and workforce planning.

Non-Discrimination

1.12 Programming efforts to ensure disability is mainstreamed into all other sectoral laws, particularly anti-discrimination legislation and policies.

1.13 Include non-discrimination terms and provisions in partner/donor funding arrangements, including adequate provisions to address reasonable accommodations.

1.14 Convene and support stakeholders in the region – including national governments as well as multilateral and non-governmental partners - to mobilise efforts towards deinstitutionalisation, in accordance with the recommendations and guidance within *Guidelines on Deinstitutionalisation including in emergencies*.

Social Protection

1.15 Support all countries in the region to adopt disability-specific support benefits and allowances based on good practices in the region, including protecting the right to work, and to embed these in relevant policies, legislation, and budgets.

1.16 Implement disability-inclusive mainstream social protection schemes, which protect the right to access specific disability support benefits and necessary family benefits.

1.17 Develop social protection schemes that support children with disabilities and their families.

1.18 Establish schemes that enable people with disabilities to access social welfare assistance automatically in the event of natural disasters, without having to provide evidence of hardship.

2. Supporting equitable and rights-based allocation of resources

The IDEARS should include a focus on assisting Australia's partner governments in their allocation of public resources, to ensure that this is done in an equitable and CRPD compliant way.

This would involve Australia embedding commitments within IDEARS to:

2.1 **Support partner governments to improve public finance management budget reporting to allow disability-focused expenditure analysis and outcome reporting**. This would cover aspects such as disaggregation of data, thematic reporting, and disability-related indicators within their budget documents. It would include supporting ministries and local authorities to develop costed plans to make their services and programs disability inclusive.

2.2 **Foster dialogue and support to partner governments to allocate adequate public resources to disability equity and CRPD-compliant expenditure**.

2.3 Incorporate **non-discrimination and accessibility requirements in DFAT's public procurement processes** for all infrastructure, goods, and services at a national and local level, including for ODA-funded programs. Disability equity within public procurement is a **real opportunity for Australia to show leadership and innovation** and use its **bilateral relationships to influence partner governments' practices** towards the achievement of disability equity and rights.

2.4 Build upon and continue the investment in training of government **focal point, in-particular CRPD training at national level for government ministries in partnership with the OPDs, training around disability inclusion and budgets,**

and of course consulting meaningfully with OPDs in decisions related to public resource allocations, and support for their budget advocacy work.

2.5 **Maintain and increase levels of Australian aid investment in disability equity and rights comparable with the OECD disability marker**. The IDEARS should be used to continue fostering relationships with non-government stakeholders, including multilateral partnerships (such as UN agencies, PIFs, ADB), and INGOs, including through ongoing partnerships and resource allocation to them. Moreover, progress towards disability equity and rights will be achieved through broader investments, such as those classed as economic growth or GEDSI.

3. Monitoring & Evaluation that ensures <u>equity</u> not only <u>inclusion</u>

It is imperative that <u>all</u> DFAT funding and investments include strong **indicators that monitor and evaluate <u>outcomes</u> for disability equity**. Too often we see donors and even governments monitoring only activities or outputs. This can track performance of disability inclusion to some extent **but is not adequate to evaluate whether disability equity and rights are being achieved for all people with disabilities**. Measuring disability equity requires data showing the extent to which people with disabilities are accessing outcomes on an equal basis with others, as well as analysis of the distribution of those outcomes across the diversity of people with disabilities, including those who are under-represented or more marginalised.

To address this, we call for the IDEARS to include a commitment from DFAT to:

3.1 Develop a **robust MEL framework** for the IDEARS, that applies at the **level of investments, partnerships, and strategy implementation.** Ensure that indicators for **disability equity and rights outcomes (**not only outputs or activities) **are incorporated throughout all of DFAT's investments and development partnership plans.** These should include specific indicators relating to disability equity and rights outcomes, not just general GEDSI-related indicators. Similarly, performance against all indicators should be monitored through data disaggregated by disability in particular, and not grouping people with disabilities together with 'marginalised groups.

3.2 **Appoint an independent organisation with specialisation in disability playing a watchdog role within DFAT** to monitor and evaluate these outcomes (regarding whole of DFAT outcomes and/or IDEARS implementation in particular) and ensure accountability. Representation of people with lived experience within this is essential.

3.3 **Ensuring good practice and internal capacity of DFAT and partners regarding monitoring and evaluation, including data collection required to support this. This entails adequate resourcing for technical assistance and capacity building** of staff and partners working on the overall disability equity and rights performance framework, as well as those responsible for investment-specific M&E and data.

4. Strengthening data

Ongoing advocacy and partnerships between OPDs, national PIC governments and donors, including DFAT, has seen **strong progress in national disability data over recent years**. For example, the Washington Group Short Set question set has been used in national censuses, Household Income and Expenditure Surveys (HIES) and Multi Indicator Cluster Survey (MICS) in at least **eleven PICs in recent years**. Further challenges still exist for Pacific OPDs, governments and others, including:

- **Analysing data from a disability equity and rights perspective to inform policies.** The support that UNICEF and SPC have provided PICS to produce disability monographs has been an example of partnerships that can address this.

- **Technical capacity** e.g. enumerator skills in data collection.

- Strategies for **engaging with and collecting data regarding the most marginalised people with disabilities**, e.g. people with very high support needs, people with intellectual and psychosocial disabilities, and people with disabilities in regional and remote areas.

- **Systemic processes within governments to capture disability data throughout administrative data systems** such as Health and Education Information Management Systems, and vital technical expertise and capacity building to support effective development of and interlinkages between these systems.

- The need for a specific survey to **assess the level of education of people with disabilities** by utilising the WG/UNICEF Inclusive Education Module as well as **assessing the employment and unemployment status of people with disabilities** by utilising the WG/ILO Disability Module for Labour Force Survey

DFAT has been a leader in disability inclusive data, including partnerships with the Washington Group on Disability Statistics of the United Nations Statistics Division and UNICEF. The IDEARS is a prime opportunity to further this.

The IDEARS should show DFAT's commitment to robust data collection **that captures evidence on the experiences, situations, barriers, and support requirements of diverse people with disabilities**, both within Australia's aid program and within our partner governments.

This could include using the IDEARS to show commitment to:

4.1 **Extending multilateral partnerships and initiatives** around disability data, for example with the United Nations Statistics Division.

4.2 Providing support to **strengthen partner governments' disability data collection, management, analysis, and utilisation** capabilities.

4.3 **Building OPDs' capacity around data**, including their understanding of various disability data collection tools and analysis methods and processes to strengthen their use of data for advocacy.

5. Australian Leadership

We are proud to be in the same region as Australia, globally recognised for its leadership in disability inclusion. We are excited to that, that Australia taking the lead in championing for a new, higher standard centred on 'disability equity and rights.' For credible leadership this standard must be seen not just in words but in action. This starts with being a **strong funder globally and in the region.**

Leadership also requires a dynamic mobilisation within the international stage. **The IDEARS is the opportunity for Australia to play a role that galvanises and brings in other donors through activities and investments that focus on** networking, sharing resources, research, harnessing collective resources (both financial and non-financial) and leveraging each other for the purpose of more effective and scaled action for disability equity and rights. **The regional mechanism had this vision as a multi-donor platform that Australian could lead and leverage to <u>spark action and collaboration from players across the</u>**

world stage. To retain its leadership, Australia also needs to retain a singular focus on disability equity and rights, and not only address this via a broader GEDSI approach.

We recommend that the IDEARS confirm a commitment to:

5.1 **Commit to the flexible Pacific Regional Funding Mechanism beyond the initial co-design phase.**

5.2 **Commit to working with other donors to engage with and provide support through the flexible Pacific Regional Funding Mechanism –** therefore re-invigorating and **confirming the Pacific Regional Mechanism's <u>original purpose as a multi-donor platform</u> as to maximise mobilisation and impact** for people with disabilities across the region. Such a commitment is important to prevent the risk that the vision will lessen into the Mechanism becoming regarded by stakeholders across the region as only a one-donor facility.

5.2 **Pursuing research and thought leadership**, **furthering specialised technical expertise, and building an evidence base regarding disability equity and rights together with partners (including OPDs).** This should relate to key and emerging issues such as climate change, preconditions to inclusion, and inclusion of underrepresented groups and further marginalised people with disabilities, such as those with psychosocial and cognitive disabilities, and those with high support needs.

6. Equity for underrepresented groups and those facing intersectional discrimination

There are many people with disabilities who face **higher levels of barriers or risk**. This may be because there are higher levels of exclusion or discrimination associated with their particular impairment such as those with intellectual or psychosocial disability, Deaf people, or people with high support needs (regardless of impairment type).

There are also people with disabilities who **experience further marginalisation due to intersecting forms of exclusion and discrimination** on the basis of, for example, gender, age, ethnicity, remote location, etc. It is therefore critical that IDEARS pays attention to how individual experiences of equity and rights play out within and across already marginalised or underrepresented groups of people with disabilities, and develop **specific, intentional strategies to combat these intersectional sources of exclusion.**

The 2023 Pacific Regional Conference on Disability held side events with representatives with lived experiences in relation to **Indigenous Persons with Disabilities, Persons with Psychosocial Disabilities, and Persons with Cognitive and Intellectual Disabilities, Older Persons with Disabilities, Youth and Women with Disabilities**. We refer the IDEARS drafting committee to the recommendations of the Outcome Statements of each of these when finalising the IDEARS to ensure the voice of these underrepresented groups are incorporated.

The IDEARS should include a commitment to:

6.1 Creating **safe spaces for engagement with people with disabilities from underrepresented groups to understand how individuals experience differs**. Ensure this information then **translates to equitable and inclusive policy making and programming**, targeted use of existing resources, and genuine, collaborative partnerships across the region.

6.2 **Considering and addressing the ways in which existing power structures and inequalities** (social and political structures and norms, power relations, economic

systems) **particularly exclude the most marginalised** people with disabilities and **developing dedicated strategies to overcome these.**

6.3 **Enacting the specific recommendations of the Outcome Statements** of the Indigenous Persons with Disabilities, Persons with Psychosocial Disabilities, and Persons with Cognitive and Intellectual Disabilities, Older Persons with Disabilities, Youth with Disabilities.

7. Appropriately recognise and resource disability, and intersectionality, within GEDSI framing

While we appreciate and welcome the need for streamlining and consolidation, we are **concerned about the increasing trends towards GEDSI within the sector**, including within DFAT. We are concerned that:

- Current GEDSI approaches generally focus on **discrete identities, primarily gender, and disability is often lost** within this.

- Even where disability is well-considered within GEDSI frameworks, because the emphasis is on streamlining inclusion, **the focus still tends to be on aspects of gender equality and disability inclusion that run in parallel** – thereby tending to marginalise people with disabilities' needs that are **unique from gender** (e.g. support services, assistive technology, or inclusive education, as opposed to self-representative groups, rights awareness, or data collection).

- GEDSI approaches tend to **silo stakeholders and resources into categories, for example, gender being separated from disability**. The reality is that many people exist at the intersection of these categories, such as women with disabilities, or others face higher risk of being excluded within these categories (such as those with intellectual disabilities). The GEDSI approach can inadvertently tend to **overlook the experiences of these people** in the way it categorises people and groups. While aiming for efficiency, a **siloed GEDSI approach is therefore counterproductive** and perpetuates if not exacerbates the exclusion of those most marginalised from development policy and programming.

Intersectionality, when applied well, addresses many of these concerns by recognising the **multiple intersecting sources of identities, power and oppression** that exist in a particular context and looking to the **address these sources.** We are concerned that in practice; however, we often see **intersectionality is confined to just multiple categories of identity** (e.g. women with disabilities, Indigenous people with disabilities, LGBTIQ people with disabilities). With this perception and interpretation,, we are increasingly concerned about 'intersectionality' being **overwhelming for already time-poor development practitioners** when it only results in them being presented with essentially longer and **longer checklists without the context or tools regarding how to address the sources** of these groups' marginalisation. Moreover, we have spent many years advocating to bring the experiences of women with psychosocial disabilities, Deaf children, people with intellectual disabilities, and people with high support needs to the forefront, and **are concerned that they could get 'lost' within a poorly or incorrectly defined intersectionality** approach that leads to a longer identity checklist. We are concerned that our barriers through the impairment is watered down through the intersectionality lens as it is being applied.

Put another way, we are concerned that what is being applied is a superficial approach to intersectionality which **hides the structural and attitudinal barriers faced by traditionally underrepresented groups** – meaning they will continue to be missed and inequalities exacerbated with the real risk of being left further behind. Tokenistic language and

approaches to intersectionality and GEDSI is not enough to meaningfully achieve equity and rights for *all* marginalised groups of people with disabilities.

With this context, we recommend that the IDEARS must:

7.1 **Recognise disability as a specialised area** in terms of:

- **Resourcing,** e.g. the need for dedicated funding for reasonable accommodations, and for supporting underrepresented groups.

- **Technical expertise**. i.e. not relying only on gender or GEDSI-specialists, but recognising that disability inclusion requires unique specialisations, including input of those with lived experience; and

- **Programming,** through disability specific programs such as OPD capacity building alongside mainstream programs.

7.2 **Articulate how disability will be specifically addressed and resourced as part of DFAT's wider GEDSI approaches.** This should include a commitment to development of disability-specific guidance, and training to ensure disability is embedded in GEDSI frameworks.

7.3 **Define, embed, and provide guidance on a transformative understanding of intersectionality in the context of disability equity and rights.** This should avoid identity-based approaches, and rather focus on exploring the relationships, social and economic norms, and impact, and how these can be addressed to empower and achieve rights for all.

8. Rights-based OPD engagement and organisational strengthening

Despite growing recognition of the importance of OPD engagement in decision-making forums, considerable gaps remain in ensuring that this engagement is meaningful. The International Disability Alliance (IDA) Global Survey found that, **while OPDs are increasingly participating in policies and programming that affects them, their contributions are not sufficiently taken into account**. OPDs reported feeling like they are being invited to 'legitimise a process, without their views being adequately considered,'[4] and had limited roles to meaningful shape donor policies.[5] This aligns with the anecdotal experiences we hear from members across the region, with often development investments undertaking quite tokenistic engagement with OPDs, the same sentiment with some of the experience of the OPDs with partners 'consulting' them for disability inclusion in their program but are in practice then very poor in the feedback loop back to the OPDs, as well as resourcing of the OPDs as part of the inclusion efforts . This all **draws heavily on OPDs' limited time** but often fails to provide them with meaningful opportunities to influence investment decision-making or strategic direction. **OPDs' participation may legitimise the process and align with donor reporting requirements focused on 'if' OPDs participate, not 'how' they do.** OPD's often feel that partners consult and draw on their experience to **secure the necessary investment for disability inclusion in their program** but are often **left out in the implementation and resourcing** of the OPDs to deliver on the disability inclusion aspect**.** It does not necessarily ensure effective engagement or more equitable outcomes for people with disabilities. Tokenistic engagement will likely persist – an inefficient

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[4] IDA, 2020, p. 9.

[5] The Development for All policy was explicitly noted as an exception to this – see IDA, 2020, p. 64.

use of both OPDs' and investments' resources and opportunities – **unless donors change their guidelines, requirements, and reporting criteria**.

Organisational strengthening for OPDs is also essential for the realisation of disability equity and rights and we welcome the benefits that DFAT's new IDP Tier 2 indicator in relation to capacity building support to ODPs could bring. We note, however, that activities delivered through organisational strengthening programs should be designed on a case-by-case basis. **Funding should be responsive to the individual OPDs' needs, their own priorities, their capacity to absorb growth and development, needs for reasonable accommodation and the pace at which it is sustainable for them to do so.** Funding should also be reflective of OPDs' unique role as an advocacy-focused CSO and their capacity supported to be effective in this role, **rather than a traditional service-delivery program partner**. It should be cognizant of the fact that the majority of OPD staff themselves have lived experience of disability which is often highly associated with systemic discrimination, stigma, and disadvantage. This may have impacted their access to education and their lived experience may continue to affect their lives in other ways. To sustainably grow OPDs, funding and programming **must be delivered across the broad spectrum of organisational capacity development and strengthening support.** This includes, for example: providing leadership skills and professional development opportunities to staff members in parallel to funding activities for due diligence and compliance; providing capacity development on climate change impact in parallel as part of a climate change project etc. Doing so will ensure that OPDs have the knowledge and understanding to marry their lived experiences with the science around them and implement the project effectively.

Furthermore, instead of mandating that OPDs meet the standard compliance expected of all program partners, flexibility should be considered. **Investments and programs should examine their capacity to support OPDs in achieving compliance, by reducing their own requirements so they are proportionate and mindful of the unique scale and profile of OPDs**. PDF is currently undertaking a compliance assessment of all OPDs and will produce individual OPD profile, this should provide the basis of engagement and to understand support requirement for OPD. We were encouraged to note the Australian Government's new International Development Policy commitment to reducing barriers faced by local partners (including OPDs) by increasing program flexibility. **We look forward to working with Australia's development program to identify ways to reduce such barriers for OPDs**.

We therefore recommend that DFAT should leverage IDEARS to:

8.1 **Recognise OPDs as lived experience experts and leaders** of disability equity and rights.

8.2 **Commit to engaging OPDs within strategic and decision-making roles** within investments, policies, and key groups, not merely as participants in consultations.

8.3 **Reframe reporting on OPD engagement by examining the quality of engagement**, not only counting the number of engagements. Quality should be assessed following rights-based principles and involvement of people with disabilities as leaders in decision-making roles.

8.4 **Commit to appropriate resourcing for all of the above**, including reasonable accommodations.

8.5 **Commit to fostering the leadership growth of diverse people with disabilities** within the movement, by implementing a leadership program and network (modelled after the one facilitated through the Australian Awards program in the early 2010s).

8.6 **Commit to continue organisational strengthening of OPDs across the Asia and Pacific regions.** This should include dedicated efforts to strengthen the organisational capacity and support for:

8.6.1 **Regional umbrella/federation OPDs**, which are crucial for representing regional issues at international and multilateral forums, providing high level policy analysis and insight, and providing support, capacity development and relationship brokering to member OPDs – particularly emerging OPDs new to dealing with donors and governments.

8.6.2 **Commit to support crossing learning of OPDs across the Pacific and in Asia as part of capacity development and mentoring.**

8.6.3 **OPDs representing under-represented groups**, including those of people with intellectual and psychosocial disabilities, Deaf people, people in remote and rural areas; and

8.6.4 **Building capacity of OPDs to include the most marginalised people with disabilities** (including the above disability groups, as well as those with high support needs, multiple disabilities, women with disabilities, youth with disabilities, LGBTI people with disabilities and indigenous people with disabilities).

8.7 Articulate that **such organisational strengthening should be for the purposes and at the pace that will be sustainable and beneficial to the OPDs, recognising OPDs' unique organisation profile and history**.

8.8 **Commit to developing innovative ways** to providing organisational strengthening to OPDs that addresses these needs and is centred on 'do no harm' principles.

END.