Good Practice Note

Environment & Social Framework for IPF Operations

Non-Discrimination and Disability

THE WORLD BANK
IBRD • IDA

First Edition
Published June 2018

Abbreviations

CRPD   United Nations Convention on the Rights of Persons with Disabilities

ESA   Environmental and Social Assessment

ESCP   Environmental and Social Commitment Plan

ESF   Environmental and Social Framework

ESP   Environmental and Social Policy

ESS   Environmental and Social Standards (ESS1–10)

GPN   Good Practice Notes

ICT   information and communications technology

SEP   Stakeholder Engagement Plan

TORs   Terms of Reference

UN CRPD   United Nations Convention on the Rights of Persons with Disabilities (2006)

Glossary

Accessibility: The degree to which the physical environment, transportation, information and communications, and other facilities and services open or provided to the public are accessible to all persons, including those with disability.

Disability: The United Nations Convention on the Rights of Persons with Disabilities (CRPD) defines persons with disabilities as including "those 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."

Discrimination: The CRPD defines discrimination on the basis of disability as "any distinction, exclusion or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field."

Mitigation hierarchy: Anticipate and avoid impacts, minimize residual impacts, offset or compensate.

Reasonable accommodation: The CRPD defines reasonable accommodation as "necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms."

Universal access: Unimpeded access for people of all ages and abilities, which should be incorporated into project design for new facilities and reviewed for existing facilities.

World Bank Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

Contents

1. Introduction

Environmental and Social Framework

Under the World Bank's Environmental and Social Framework (ESF), the Bank has strengthened its commitment to working against prejudice and discrimination toward project-affected individuals, groups, and workers, and to enhancing development opportunities, specifically for disadvantaged or vulnerable individuals or groups.

World Bank Good Practice Notes (GPN) accompany the ESF to support its implementation. This Note focuses on investment project financing issues relating to discrimination based on disability. The GPNs have been developed in partnership with specialist advisers from inside and outside the Bank and are designed to be reviewed and updated periodically, when appropriate. The Note should be read in conjunction with the ESF, including the Policy, the Environmental and Social Standards (ESS1-10), and the accompanying Guidance Notes. Issues related to disability are specifically recognized in the Policy and all Environmental and Social Standards.

" Social development and inclusion are critical for all of the World Bank's development interventions and for achieving sustainable development... inclusion means empowering all people to participate in, and benefit from, the development process. Inclusion encompasses policies to promote equality and nondiscrimination..."

Box 1: UN Convention

- The UN Convention on the Rights of Persons with Disabilities (CRPD) understands persons with disability to be individuals "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" (CRPD, Article 1).

- The World Bank includes persons with disabilities as a category of vulnerable and disadvantaged people. The World Bank *Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups* defines disadvantaged or vulnerable individuals as those individuals who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a projects benefits.

Discrimination on the basis of disability means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person with disability from being on an equal basis with others, thereby potentially enhancing the negative impacts of the project or limiting project benefits or being able to voice comments or concerns during stakeholder engagement.

Discrimination can be direct or indirect. An example of direct discrimination could be to exclude a child who is blind from attending school. Indirect discrimination refers to nonintentional discrimination arising from practices that are not designed to exclude, but result in that outcome, such as holding a stakeholder consultation at an inaccessible meeting venue, which results in preventing physically disabled

individuals from participating. Indirect discrimination is often embedded in institutional policies, norms, and standards.

The ***ESF strengthens the Bank's commitment to identify vulnerable or disadvantaged individuals and groups, including persons with physical or mental disability, and assessing and preventing potential risks and negative impacts that could affect them disproportionately, as well as barriers to accessing project benefits.***

Project identification, appraisal, and monitoring may all play a role in implementing the commitments at the project level under five specific mechanisms:

    a. the Terms of Reference for the ESA

    b. the Environmental and Social Assessment itself

    c. the Environmental and Social Commitment Plan (ESCP), and

    d. through adaptive risk management and monitoring and evaluation during implementation.

In addition, the Stakeholder Engagement Plan (SEP) identifies stakeholders with specific needs and explains how the information disclosed and engagement will be designed to be meaningful.

Non-discrimination and disability in environmental and social management

> The ESA should be initiated as early as possible in order to identify issues and influence project design.

The analysis of the inclusion of disability issues in an Environmental and Social Assessment (ESA) is guided by three principles underlying the ESF:

    a. the potential for increased vulnerability of persons with disabilities to be adversely affected by the project needs to be avoided and mitigated

    b. their ability to take advantage of project benefits, including employment where skill sets are appropriate and reasonable accommodation can be provided, and

    c. the need to include vulnerable and disadvantaged stakeholders in the information disclosure and consultation process in a meaningful way.

The ESA should identify opportunities to include accessibility measures in project design, where financially and technically feasible, if disability risks and impacts have been identified as part of potential project impacts.

Sound mitigation measures can result in not only an inclusive project, but demonstrate good international practice, and can raise awareness on disability issues and accommodating needs of vulnerable groups. These measures, while designed for persons with disabilities, often benefit other groups of society, as well. For example, low-level buses and inclined curbing on street intersections or pedestrian walkways also benefit parents with small children in strollers.

> **Box 2: Accessibility**
>
> Accessibility refers to the degree to which the physical environment, transportation, information and communications, and other facilities and services open or provided to the public are accessible to all persons, including those with disability.

Mitigation of disability risks and impacts may include differentiated measures for persons with disabilities in the application of project requirements or systems. The aim of preventing discrimination and providing reasonable accommodation, if needed, is to limit negative impacts from the project and enable persons with disabilities to increase their ability to benefit from development projects.

2. Scoping

Scoping phase

The Scoping Phase allows for an initial understanding of potential project environmental and social risks and impacts that are typical for the type of project, location, and context.

Scoping plays several roles with regard to disability. First, it identifies relevant project issues and affected stakeholders, including vulnerable individuals or groups. It may also begin to identify potential barriers that need to be assessed, such as attitudes, norms, communication limitations, legal restrictions or failure to implement legal safeguards, or physical barriers that may result in the exclusion of persons with disabilities from benefiting from the project or that could make them more vulnerable to adverse impacts from the project. Through an understanding of the project context and the institutional and legal frameworks, the ESA can review whether the project area is one where persons with disabilities face a high risk of discrimination.

Disability is a cross-cutting issue and is characteristically addressed in a fragmented way across legal frameworks. This is the case even where a national disability law and/or national disability policy or action plan exist. Therefore, the ESA will need to identify and take into consideration laws and regulations relevant to the project and its workforce, including non-discrimination legislation, disability protection, building codes, family law, labor laws, and housing regulations. The World Bank requirements should reinforce existing rights and requirements, and identify gaps for supplemental protection, where they exist.

Disability is a general term that covers many different issues and limitations; specific needs and mitigation measures relevant to the project area will need to be identified and differentiated in the ESA. There are many types of disability, and impacts and mitigation measures cannot be generalized. For example, if there are a significant number of persons with vision disability in the project area, the Borrower may consider printing some project information in large print or Braille, or having someone meet with a group to discuss the project, impacts, and mitigation. At the same time, a school for the deaf that is located along the project transport route may need written information about transport schedules, and contractors/drivers may provide warning lights on their vehicles. Impacts may be very different for different types of disability, and they should not all be grouped together.

Key questions

The Scoping process asks key questions to identify what risks and opportunities are associated with the project. Examples of questions regarding disability include:

a. What are the potential social impacts? Are there impacts that would disproportionately affect persons with disabilities?

b. What measures would need to be taken to ensure that persons with disabilities have full access to project benefits?

c. How can the Borrower ensure non-discriminatory hiring and employment?

d. What health and safety hazards posed by project activities could disproportionately impact persons with disabilities?

e. What strategy should the Borrower implement to ensure that persons with disabilities are included and meaningfully consulted in stakeholder engagement activities and that they can equally access project-related grievance mechanisms?

f. How can the Borrower ensure full and effective participation of persons with disabilities throughout implementation?

Terms of Reference

Scoping results in detailed Terms of Reference (TORs) for the ESA. The Bank supports the process by providing good practice examples and advice to result in TORs that achieve the following with regard to disability:

> Where vulnerable or disadvantaged stakeholders are identified, the TORs should specify, where possible and feasible, that an expert social development specialist is part of the team preparing the ESA to assess vulnerability and advise on mitigation.

a. Identification of disadvantaged or vulnerable individuals or groups in the project according to the environmental and social context and sector, including persons with disabilities;

b. Assessment of specific risks and impacts to disadvantaged or vulnerable individuals or groups and Identification of differentiated mitigation measures as needed; and

c. Identification of any specific needs or support to allow vulnerable groups/individuals to access information about the project and to participate in the stakeholder engagement process.

Stakeholder mapping

Stakeholder mapping should be sensitive to those who may experience societal barriers on the basis of disability within the project area, even if they may not self-identify as disabled. Individuals may face stigma and discrimination with regard to the term "disabled" and prefer not to be labelled as such.

The Stakeholder Engagement Plan should identify those who need additional support to participate in consultation, without categorizing them, where this is a sensitive issue. The important thing is to identify vulnerable individuals and groups who may be affected by the project and to assess the impacts and mitigate them in accordance with the ESS requirements.

When mapping stakeholders with disability, attention should also be given to family members and/or caregivers providing support for a household with a disabled person. They are often unable to participate in stakeholder engagement because of their caregiving responsibilities. Caregivers may have different impacts; for example, when a disabled person must be resettled, this may create a disproportionate impact if their caregiver is not included in the resettlement plan, even if they are outside the boundary of the resettlement area. Discussions with caregivers and organizations, however, do not replace the importance of consultation directly with persons with disabilities.

Some project sectors that are financed by the Bank have traditionally been associated with higher risks of discrimination regarding persons with disabilities. Annex 2 provides an overview of sectors and highlights selected key questions to understand potential risks of discrimination for persons with disability; however, every project is unique, and has a project-specific context that may differ.

Scoping should identify the presence of persons with disabilities and the potential differentiated risks from project impacts, the proportionate nature of these risks, the community's social acceptance, and

overall public perception. Scoping these issues may include a combination of social mapping, stakeholder analysis, and a preliminary understanding of the community characteristics. The ESA should assess risks and impacts as well as opportunities related to disability and discrimination on two levels: the project investment level, to provide accessible infrastructure or services; and the institutional level, to identify country needs that would make it more inclusive.

Scoping may involve an analysis of secondary data, existing research, key informant interviews, and the prior experience of the implementing agency. A review of community characteristics can identify the sociocultural and political context (that is, formal *and* informal organizations that influence decision making, social conflict, and societal behavior).

Understanding the attitudes of mainstream or predominant groups toward persons with disabilities is important to understand how stigma could affect their ability to participate in project benefits, consultations, or raising concerns or grievances. This analysis can be combined with analyses of other aspects of vulnerability.

Data

When assessing the context of disability within a country, it may be difficult to obtain or rely on the accuracy of quantitative data. Some individuals with disability may be reluctant to self-identify as someone with a disability. Likewise, many types of disability are "hidden" (such as developmental disability, disability that has not been diagnosed or treated, and many types of psychosocial disability), and the determination of disability cannot be ascertained through simple observation. The 2011 World Health Organization-World Bank *World Report on Disability*[1] puts the global estimate of persons with disabilities at 15 percent. The ESA should try to identify potentially vulnerable people, and mitigation should be built into the project, where appropriate.

Despite these limitations, quantitative data derived from specific disability indicators, such as prevalence in education, accessible schools, employment, accessible public spaces, and transport are a good starting point to understand data availability and progress in disability inclusion. To overcome the challenges of data quality, early engagement with local or national organizations comprising persons with disabilities or acting on behalf of persons with disabilities can complement the analysis. Early engagement

Box 3: Mental Disability

1. Identifying persons or groups with disability should not focus only on physical disability, but on all types of disability, including mental disability. Persons with mental disability are often excluded and may be more reluctant to identify their needs than persons with other types of disability.

2. In addition to existing mental disability in an area, projects that result in significant changes to communities (for example, large-scale infrastructure projects or projects that change social norms) can increase the psychosocial stress in a community, and this can present itself in increased substance abuse, domestic violence, community unrest, and other impacts that may affect mental health.

3. Mental disability issues may be difficult to identify, and there may not be as many organizations supporting persons with mental disability as other types of disability. Identify community-based mental health programs, or other sources of information, and work with the social specialists to identify potential stresses to which the project may contribute and appropriate mitigation and consultation needed.

---

[1] http://www.who.int/disabilities/world_report/2011/en/.

with local or national disability organizations, especially representative organizations governed by persons with disabilities, can complement the analysis. Stakeholder engagement strategies can help identify organizations to advise on groups of people with specific needs and how best to understand the impacts and concerns that may be related to the project.

At the end of the Scoping Phase, the Bank provides an initial classification of the social risks of the project (High, Substantial, Moderate, or Low), which includes specific risks to vulnerable individuals or groups, including persons with disabilities, and highlights any needs for institutional strengthening, capacity-building measures, and data gaps that should be further assessed.

3. Assessment

Assessment phase

The assessment phase expands on the issues identified in scoping, including institutional and legal analysis, identifying in further detail potentially affected persons and groups, and assessing the potential direct and indirect social impacts. The ESF outlines specific non-discrimination measures to address discrimination of disadvantaged or vulnerable individuals or groups, which include persons with disabilities.

Non-discrimination includes the need to reasonably accommodate project design and engagement where discrimination has been raised as a potential issue, and to apply principles of universal access, where technically and financially feasible. Table 1 summarizes the main provisions across the environmental and social standards that can help guide the assessment of potential social risks and impacts to persons with disabilities.

Table 1: Examples of Entry Points for Assessing Disability in ESS 1–10
ESS1. Assessment and Management of Environmental and Social Risks and Impacts
• Undertake an Environmental and Social Assessment to identify persons with disabilities among disadvantaged or vulnerable individuals or groups. • Assess potential differentiated impacts, barriers to participating in project benefits, including employment (see ESS2), and identify how these can be addressed in the project design or through reasonable accommodation. • Review the institutional and legal framework, including identifying potential for discrimination and exclusion based on disability and recognizing the cross-cutting and often fragmented nature of disability laws and institutional frameworks. • Identify indicators to monitor and obligations to incorporate in Environmental and Social Commitment Plan and Management of Contractors, recognizing the need for disaggregation of data on the basis of disability.
ESS2. Labor and Working Conditions
• Clarify legal requirements for employment and disability, including reasonable accommodation of the workplace. • Identify labor management procedures, strategies, non-discrimination policies, code of conduct, confidentiality of personnel records that might include disability or medical information, and recruitment requirements. • Identify practices that could discriminate against workers with medical conditions, such as forced testing or treatment. • Review worker grievance mechanism for issues of harassment, discrimination, and its accessibility for disabled workers.

- Assess whether workplace policies are family friendly (that is, to care for family members with disabilities).

- Establish policies to accommodate workers with disabilities or long-term illnesses including HIV/AIDS.

- Identify barriers within the project (for example, access to buildings, transport) and measures to reasonably accommodate the needs of workers with disabilities.

- Identify whether there is an antidiscrimination policy or equal opportunity policy in place, and whether disability is included in its definitions.

- Clarify hiring and firing practices and whether training of decision makers supports employment of persons with disabilities.

- Introduce measures regarding non-discrimination and equal opportunity, and commitment to reasonable accommodation in the workplace, including in recruitment and hiring, compensation and promotion, termination or retirement, working conditions and terms of employment, and job assignment. Such accommodation may include job sharing, time away from the workplace for medical appointments, and so forth, as well as removal of physical barriers (such as providing workspace on the ground floor for someone who cannot climb stairs).

- Identify occupational health and safety measures to prevent workplace illnesses or accidents for all workers, including workers with disabilities. Special attention should be paid to evacuation and emergency response for workers with disabilities, including those who cannot hear alarms, or people who cannot descend a staircase.

ESS3. Resource Efficiency and Pollution Prevention

- Identify differentiated impacts of pollution or disruptions in services provisions on persons with disabilities. For example, breaks in power or water supply can be more hazardous to people who depend on these services for health reasons. Roads that may be affected by construction traffic may become impassible for persons with mobility disability.

- Identify opportunities created for barrier removal in resource efficiency interventions.

ESS4. Community Health and Safety

- Apply principles of universal access for new buildings and structures into project design.

- Recognize differentiated health and security hazards for persons with disabilities, in each project phase.

- Introduce differentiated measures in emergency response and preparedness plans for persons with disabilities and vulnerable groups.

- Identify disproportionate project impacts on persons with disabilities, and identify mitigation measures, including traffic and road safety measures, differentiated measures in emergency response, and preparedness procedures.

- Assess potentially higher risks of labor-influx-related impacts.

ESS5. Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

- Assess needs of persons with disabilities with regard to resettlement, including the principle of universal access and accessibility measures for new housing.

- The baseline socioeconomic surveys conducted in Resettlement Action Plans (RAPs) should identify individuals who might experience disproportionate impacts of the project. Persons with disabilities are often more likely to be economically and socially marginalized. The determination of the compensation and assistance measures need to take into consideration that restoring their livelihoods might be harder for persons with disabilities in terms of access to goods and services, proximity to medical treatment, and so forth. This should be taken into account in designing the resettlement process and may include additional support for the transition period and moving allowance and consideration of their situation in the design of housing or prioritization of location.

ESS 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources

- Identify differentiated impacts of biodiversity loss or loss of access on persons with disabilities. They may rely on traditional medicines and access may be affected by the project during some of the phases.

- Project influx or location of project facilities may affect inflation and lower quality of food resources available to persons with marginal incomes, resulting in further impacts to health.

ESS7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

- Recognize and introduce measures to mitigate increased discrimination on the basis of disability.

- Identify cultural differences with regard to disability, including language and conceptual frameworks, and rephrase issues and impacts where needed, so that discussion is meaningful.

- Identify culturally appropriate inclusion of persons with disabilities in the assessment and consultation stages, including concepts of universal access and specific limitations identified.

- As part of the ESA, the social assessment should document the complex relationships indigenous persons with disabilities have, both within their own community and with mainstream society. The nature of collective decision making and other cultural characteristics of the indigenous or traditional local community need to be taken into account in the consultation process.

ESS8. Cultural Heritage

- Identify any cultural impacts that might affect persons with disabilities and include specific measures to provide or enable them to access sites of cultural importance, and have input into changes required by the project, such as changing locations of cemeteries.

ESS9. Financial Intermediaries

- Develop and implement policies consistent with non-discrimination on the basis of disability and the need to provide reasonable accommodation where technically and financially feasible, both in the financial intermediary and in its subprojects.

ESS10. Stakeholder Engagement and Information Disclosure

- Require specific measures and/or assistance to facilitate the meaningful participation of stakeholders with disabilities in consultations (for example, means of participation, information in accessible formats prior to discussion or consultation events, accessibility of venues) to be incorporated into the Stakeholder Engagement Plan to enable preparation and meaningful participation.

- Identify organizations, authorities, and service providers (for example, medical providers, where organizations cannot be found) who can help identify persons with disabilities and their representative organizations. All of these stakeholders have a role to play in clarifying issues and communication methods.

- Discuss issues directly with persons with disabilities, not only with organizations that work on their behalf. Persons with disabilities and their representative organizations are often left out of the conversation.

- Apply measures to facilitate the participation of stakeholders with disabilities, and if significant numbers of persons with disabilities are affected by the project.

Baseline indicators

Baseline indicators on disability in the project area should include a set of quantitative indicators against which project impacts can be compared in future and data that can inform project design. They should also include qualitative information, which may be more recent and provide more clarity on impacts and opportunities, particularly if quantitative data are dated or incomplete. If the project is likely to cause differentiated impacts to persons with disabilities and there is a lack of national-level data on disability, primary data collection might be needed to understand needs, identify possible harms, and ensure appropriate inclusion. Examples of such data include disability prevalence, types of disability, participation restrictions (in law, policy, and practice), and barriers to inclusion experienced by persons with disabilities.

Fragile and conflict areas

Special Attention in Fragile and Conflict Areas. In areas that have undergone social unrest and conflict, or are post-conflict or otherwise categorized as fragile, the percentage of persons with disabilities within

the population may be a significantly higher percentage than in countries that have not experienced these events.

Not only may the percentage of the population experiencing temporary or permanent disability be higher, but the average ages of persons with disabilities may dramatically differ from other locations. In areas that have not been characterized as fragile, conflict or post-conflict, the number of people, particularly young men in their 20s and 30s, would be a strong economic force, but in these conflict areas, they may be more likely to become disabled in military action. Moreover, the civilian impacts of these conflicts may result in many more children, women, and people of all ages experiencing significant physical disability and mental health impacts, such as psychosocial stress, than would be found in a comparable area that has not undergone these impacts.

In addition to the increased numbers and ranges of persons with disabilities, the economic and political cost of conflict or fragility makes it more likely that resources needed for supporting persons with disabilities will be under significant stress or minimal, where priority attention may be focused on water, electricity, food security, and emergency medical treatment.

Box 4: Universal Access

As defined in the Environmental and Social Framework, the term "universal access" means "unimpeded access for people of all ages and abilities in different situations and under various circumstances." The concept of universal access should be applied in the ESA and project design when it applies to new facilities and is technically and financially feasible. Refurbishment of existing facilities should be reviewed for accessibility, but it can be more problematic to accommodate universal access in existing structures.

The concept of universal access is viewed primarily as accessibility of the built environment, which includes housing and private buildings, as well as public spaces or buildings, and to the social environment, particularly in services and government offices.

Universal access can also relate to geographic accessibility for persons with limited mobility, as well as access to information and communication through channels and in formats that persons with disabilities can participate in stakeholder engagement. The principles of universal access look at a number of design and communication issues. Universal access should:

- consider diverse abilities while avoiding segregation or stigmatizing users.
- ensure privacy, security, and safety—avoid and remove hazards.
- promote independent usage, where possible.
- be easy to understand, independent of literacy, language skills, and concentration levels.
- communicate information in an effective manner, both for impacted persons as well as for other potential users of the design (for example, mothers with baby strollers can use low-floor public transport, designed for wheelchair users).

It may be useful to benchmark the project against similar projects that incorporated universal access principles, through interviews with experts and inputs from stakeholders. If universal design cannot be accommodated, because of financial or technical reasons, the project information should reflect this, as well as the rationale.

For projects in these areas, specific attention needs to be paid to identifying vulnerable groups, such as persons with disabilities, and mitigation built into the project. Grievance processes become critical to understanding when project components or mitigation are not working, and adaptive management is

likely to be necessary to tailor the mitigation to the needs of those affected so that already vulnerable groups are not disproportionately affected by the project.

Ethical and safety recommendations

Data collection needs to take into consideration ethical and safety recommendations to protect the confidentiality of the data shared. There may be cases where families may hide members of the household with disability if they fear forced institutionalization, stigmatization by the community, or further exclusion of the individual or family. As with other social data collection, persons with disabilities and their families and caregivers should have the right not to participate, to provide anonymous information or through a third party, such as a community-based organization, and they should be told how their information will be used.

When the ESA is drafted, the assessment should consider the project in an integrated manner considering the scope, scale, complexity, and type of project, as well as the nature and significance of social impacts. The Borrower should also analyze the institutional capacity and the complexity of institutional arrangements, including quality and quantity of human resources; and any track record of similar project implementation. Contextual issues that could impact the implementation of the project should also be taken into consideration (that is, proposed changes in legislation, social unrest, regional instability). Some contextual issues affect social impacts and may be beyond the scope of the project to address completely.

Mitigation hierarchy

The ESF adopts a mitigation hierarchy approach that aims to avoid risks and impacts, particularly when they fall disproportionately on disadvantaged or vulnerable individuals or groups. Table 2 shows some of the elements of assessing and mitigating disability impacts in accordance with the Mitigation Hierarchy, recognizing that the position of the mitigation measures in the Mitigation Hierarchy may vary depending on project context.

Table 2: Applying the Mitigation Hierarchy to Disability Impacts	
Mitigation Hierarchy	**Disability Impacts/Measures**
Anticipate & Avoid Risks and Impacts to Persons with Disabilities	• Identify stakeholders with disabilities and design information disclosure and engagement processes to include them in a meaningful way, including identification of project impacts that can be anticipated and avoided. • Identify potential hazards or inaccessible design dimensions that may put persons with disabilities at risk or subject to adverse impacts. • Build the concept of Universal Access into project design, avoiding impacts to persons with disabilities. • Identify people who need additional support to participate in the consultation process, such as facilitating discussions in local areas or households, not requiring travel to remote meetings.

	• Consult with disability organizations, including representative organizations of persons with disabilities.
Minimize or Reduce	• Identify options to reduce or minimize project impacts for persons with disabilities.
	• Improve education about project risks and safety issues associated with the project sites and facilities, and road safety, paying particular attention to vulnerable groups, such as children, the elderly, and disabled, as well as their families and caregivers.
	• Consult with organizations for persons with disabilities about how to minimize impacts.
Mitigate	• Introduce safety measures/accessibility options for residual impacts issues than cannot be avoided or minimized further.
	• Provide information about the project in different ways, such as in print, on the radio, and on the internet.
	• Provide specific measures to mitigate impacts to households.
	• Provide and communicate easy-to-follow grievance procedures for workers and community members with disabilities. Allow anonymous complaints and protect confidentiality of complainants.
Offset or Compensate	• Provide resources to compensate for loss, such as temporary transportation for disabled people during the construction period.
	• In the resettlement of persons with disabilities, provide equipment or accessibility measures in accordance with the principles of universal access. Monitor effectiveness and adjust as needed.

Differentiated measures

The ESA should highlight differentiated measures to be included in the project design to enable persons with disabilities to benefit from the project and mitigation measures. When assessing the measures to include, the ESA should consider:

a. *Timing:* Incorporating avoidance and mitigation measures into the project design at an early stage can help with the project costs, and outreach and consultation methodologies, and can make a significant difference in the inclusiveness of the project. The costs of building accessibility into a project design are often significantly lower than anticipated (for example, less than 1 percent of overall project cost). The cost of adapting a facility when this is addressed later is typically higher and may limit options.

b. *Complexity:* The causes of discrimination are complex and often tightly woven into the culture. Many issues cannot be easily addressed by an individual project. However, this presents an opportunity for the project to demonstrate the benefits of addressing issues relating to discrimination and disability from the outset. By communicating throughout the scoping and assessment process, stakeholders will be able to help identify practical actions that can be taken and to weigh priorities when alternatives are identified.

c. *Feasibility:* Measures to incorporate universal access in the project design and to provide reasonable accommodation for persons with disabilities in the workplace should be assessed both technically and financially. Technical feasibility assesses the ability of the project to incorporate the design elements related to universal access into the project. This is likely to be different for new building projects than it is for the refurbishment of existing facilities. Financial feasibility considers the incremental cost in relation to the project's costs and the benefit of the outcome in relation to the impact.

The recommendations of the ESA are discussed with the Borrower and a summary of the findings are included in the Environmental and Social Commitment Plan (ESCP). The ESCP sets out time-bound measures and actions required for the project to achieve compliance. The ESCP and management tools should include desired outcomes that are specific, measurable, achievable, realistic, and timely. When there is residual risk of exclusion from project benefits to persons with disabilities, the project documents should outline the efforts taken to manage these impacts and limitations experienced, and describe the potential long-term impacts in the appropriate context. The draft ESCP should be disclosed according to the agreements set forth in the Stakeholder Engagement Plan.

4. Implementation, monitoring and evaluation

Implementation

The project is monitored throughout its lifetime through reporting, site visits, and information from third parties, such as through grievances and civil society. Communication with vulnerable stakeholders, such as persons with disabilities, is important during project implementation and monitoring to understand whether the assessment was correct in its prediction of project impacts and whether the mitigation measures and agreed actions have worked as planned.

To the extent possible, monitoring indicators should be disaggregated to track differentiated impacts, such as those on persons with disabilities. Disaggregated indicators might not always be feasible, or might not be desirable if their collection could put the population at risk of further exclusion or stigma. When this is the case and baseline data are not available, there are other alternatives to monitor progress such as surveys, assessing project grievances, independent monitoring, and informal discussions with organizations that work with persons with disabilities.

If surveys are used, the same issues of confidentiality or anonymity used during Scoping and Assessment should be offered to protect the identity of the interviewees. Creative ways of obtaining feedback have been used, such as radio call-in programs where anonymity is protected.

In addition, grievances received through the project's grievance mechanism and worker grievance mechanisms provide rich data about issues of concern and how they were handled. Interviews with workers may provide more information, as even if anonymity is ensured, workers with disabilities may be reluctant to raise formal complaints.

Monitoring

Based on the results of the monitoring, amendments may be made to management plans or commitments to the Bank. Adaptive management recognizes the dynamic nature of the project development and implementation process, as well as the rapidly changing environments in which the Bank operates. In addition to reflecting changing needs that arise as part of the monitoring process, changes in project design, unforeseen events, or regulatory or political changes might require a change in the original environmental or social approach, including those regarding disability impacts and non-discrimination.

Role of the Project Management Unit/Project Implementation Unit (PMU/PIU). The PMU/PIU assesses environmental and social risks, including identification of vulnerable individuals and groups, such as those with disability. The Borrower, via the PMU/PIU, is responsible for implementing the ESSs and engaging with stakeholders, and this continues throughout project implementation.

The continued engagement with stakeholders will help to identify additional issues or mitigation as the project is implemented. In accordance with the Guidance Note for ESS1, the PMU/PIU will apply appropriate social development skills to these tasks, for example, the use of specialists, proportionate to the level of risks.

Evaluation

Monitoring and Evaluation. As part of the environmental and social assessment process, the project should plan the monitoring and evaluation of project performance and commitments. If the project is assessed to have a significant impact on persons with disabilities, this should be taken into account in designing the monitoring and evaluation plan.

Reporting. Reporting to the Bank on the implementation of the project's environmental and social performance should pay particular attention to vulnerable groups, including persons with disabilities, and confirming whether the impacts and planned mitigation measures were adequate or whether adjustments are needed to meet the overall objectives of the project and the agreed environmental and social commitments.

5. Stakeholder engagement and information disclosure

Monitoring

The Bank recognizes the importance of open, transparent, continuous, and inclusive engagement between the Borrower and project stakeholders as an essential element of good international practice and effective and sustainable project design and implementation.

Stakeholders are valuable sources of information on local environmental and social conditions and can highlight their priorities regarding impacts and project benefits. They can also be important partners and help determine the success of project outcomes. This is particularly important when assessing impacts on sensitive topics such as discriminatory practices.

Planning stakeholder engagement

In planning the stakeholder engagement process, and as part of the stakeholder mapping exercise, the Stakeholder Engagement Plan should document vulnerable groups and individuals and describe how they will be provided information and consulted in a meaningful way.

Providing persons with disabilities the access to stakeholder engagement events, such as public meetings, can have the additional benefit of raising their profile as people who may be affected by a project and whose concerns and ideas should be taken into account. However, if this is not possible, due to venue constraints, alternative opportunities should be provided for smaller meetings in locations where people have disabilities, such as in homes for the elderly or medical facilities frequented by people requiring treatment.

In addition to the main disclosure and consultation process, there should be clear information for persons with specific needs to contact the relevant project manager, and the project's grievance mechanism, to clarify restrictions on information or access to consultation processes. Where appropriate, alternative consultation can be quite effective and can give persons with disabilities a voice.

Box 5: Accessibility considerations for stakeholder engagement

- Where persons with disabilities are part of the stakeholder engagement process, consult closely with disability organizations and medical providers to identify accessibility requirements. Whenever possible, consult directly with the person(s) participating in the activity to ensure that their particular requirements are met. The following general considerations should be taken into account.

- Materials should be made available in the formats and languages that are needed for meaningful participation–for example, documents in electronic format, Braille, large print, and easy-to-read-and-understand formats at an appropriate level of technical detail. Consider oral presentations for vision-impaired stakeholders.

Box 5 (cont.): Accessibility considerations for stakeholder engagement

- When using slide presentations, photographs, maps, and other visual aids, consider needs of stakeholder who are blind or have other vision disability. A separate meeting could be held to go through the materials by verbally describing graphics and other visual elements during presentations with these stakeholders, so that they can ask additional questions and get clarification.

- In conducting face-to-face and telephone meetings or training sessions, ensure that adequate time is allocated, and that persons with disabilities understand what is being said by others and can communicate their own ideas, through arranging for sign-language interpretation, real-time captioning, or communications assistants, as needed. Communication with stakeholders with disabilities prior to a meeting can allow them to provide questions in advance that can be raised and addressed during the meeting.

- In selecting venues for meetings, training sessions, or other events, criteria for venue selection should include:

- Choose a venue that does not require going up stairs or through narrow passages, and that has rooms with sufficient space and adequate facilities for those with mobility disability.

- Participants should be able to reach the venue using cost-effective and accessible, safe transport.

- In many cases, persons with disabilities may be reluctant to raise specific issues in a large venue or meeting. In many cases, the issues are more specific to their impacts and needs, and a smaller meeting is more constructive to understand their concerns.

Disability community is not homogeneous

The disability community is not homogeneous—there are many different types, degrees, and individual experiences of disability. A representative process of consultation is therefore challenging, as several persons with vision disability or mobility disability, for example, cannot speak on behalf of all people with these disabilities. Stakeholder processes should try to reach as broad a range of persons with disabilities as possible. The relationship of disability with other and multiple factors that can increase vulnerability, such as poverty, gender, age, and disability (intersectionality), should also be addressed to the extent possible. For example, persons with disabilities living in rural areas may be particularly isolated.

Stakeholder consultation with persons with disabilities often requires multiple communication methods. Persons with disabilities and organizations and providers that support them should be consulted about their communication needs or preferences.

Despite the best efforts in project design and implementation, grievances will be raised, and managing these grievances in a respectful and timely way is important. The project is required to have a grievance mechanism for workers and one for project-affected people. The task team must communicate these to the relevant audiences and report on their implementation. The grievance mechanism should be accessible and inclusive. Persons with disabilities may be reluctant to raise concerns, both in the workplace and in the public mechanism. There should be multiple ways to raise concerns, including confidentially.

Addressing grievances of stakeholders with disabilities means taking into account the possible need for reasonable accommodations. This could mean, for instance, taking measures to ensure that persons with disabilities can communicate information about their concerns in their own language, such as sign language, and/or through the use of auxiliary aids and services. This also applies to accessibility in relation to the information provided in the response. Grievance mechanisms should account for the fact that not all persons impacted by a development project can read print, and may require large print or Braille, or a meeting to explain the results of an investigation.

Box 6: Accessibility considerations for stakeholder engagement

- Identify key actors, at both the governmental and civil society level.
- Involve organizations that represent men, women, and children of cross-disability type, including groups representing persons with a single disability, advocacy groups, and umbrella organizations, and those in remote and rural areas, to enable consultations to be representative.
- Facilitate the participation of persons with disabilities who may be marginalized in their own communities, such as women and children with disabilities, persons with mental or intellectual disabilities, persons from ethnic minorities with disabilities, and refugees with disabilities, or other characteristics that may increase exclusion, such as poverty level, sexual identify or orientation, rural or urban location, and so forth.
- Provide support, reasonable accommodation of the venue, and consultation material and capacity building to facilitate the participation of persons with all types of disabilities in consultation and decision-making processes.
- Promote the participation of representative organizations of persons with disabilities in wider civil society consultations.

ANNEX 1: Resources

Conventions and Treaties

- UN Convention on the Rights of Persons with Disabilities (CRPD) adopted on 13 December 2006 and entered into force on 3 May 2008. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html

- Marrakesh Treaty to Facilitate Access to Published Works by Visually Impaired Persons and Persons with Print Disabilities, adopted on 28 June 2013 and entered into force on 30 September 2016. http://www.wipo.int/treaties/en/text.jsp?file_id=301016

Guidance

- United Nations Development Group, Including the rights of persons with disabilities in United Nations programming at country level: A Guidance Note for Unite UN CRPD, art. 9d Nations Country Teams and Implementing Partners. http://www.un.org/disabilities/documents/iasg/undg_guidance_note_final.pdf

- Amate, E. Alicia, and Armando J. Vasquez, eds. 2006. *Discapacidad: Lo que todos debemos saber*. Washington, DC: Organización Panamericana de la Salud. http://apps.who.int/iris/bitstream/handle/10665/166080/9275316163.pdf;jsessionid=0DEE311BFC1AE33822878B27C0D186FA?sequence=1

- International Finance Corporation Environmental, Health, and Safety (EHS) Guidelines 2.1 regarding occupational health and safety and design of workplace. http://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES

Publications/Links

- Webpage on disability: http://www.worldbank.org/en/topic/disability

- Webpage on integrating disability into projects: http://www.worldbank.org/en/topic/disability/brief/integrating-disability-into-world-bank-operations

- World Bank. 2013. *Inclusion Matters: The Foundation for Shared Prosperity* (Advance Edition). Washington, DC: World Bank.

- World Bank. 2008. *Design for All: Implications for Bank Operations*. Washington, DC: World Bank. http://siteresources.worldbank.org/DISABILITY/Resources/Universal_Design.pdf

- World Bank. 2016. "Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups. World Bank, Washington, DC, August 4. https://policies.worldbank.org/sites/ppf3/PPFDocuments/e5562765a5534ea0b7877e1e775f29d5.pdf

- Design for All Foundation: http://designforall.org/

- ONCE Foundation: http://www.once.es/new/otras-webs/english/ONCEfundation

Tools

- UN's Washington Group on Disability Statistics and the Washington Group Questions. http://www.washingtongroup-disability.com/
- Australian Information Matrix. https://www.and.org.au/
- UNHCR Heightened Risk Identification Tool: https://emergency.unhcr.org/entry/124731/identifying-persons-with-specific-needs-pwsn

Education

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are there discriminatory practices in enrolment and participation of students with disability?
- Is the curriculum tailored for all to participate (that is, academic courses, social events, school trips)?
- Are school infrastructure and services universally accessible (that is, safety procedures, play areas, hygiene and sanitation, laboratories, extracurricular activities)?
- Is transportation to school accessible (that is, buses, access roads, and pathways)?
- Are educational materials accessible? Or are there auxiliary aids to support the student?
- Is special education a separate program? Is this justified/desirable? Does special education provide a curriculum that is relevant to the labor market or to higher education?
- Are teachers and school administrators qualified to teach students with disabilities?
- Are there cases of bullying, harassment, and victimization to students with disabilities?
- Are parents expected to spend overwhelming resources to allow children with disabilities to participate in school? Is there any support from the government or other organizations?
- How are tests performed and used to qualify a student as having a disability? What measures are in place to respect the confidentiality of the results? Is the person that performs the test qualified?
- Are the hiring practices of faculty and administrators inclusive?

Information and Communication Technology (ICT)

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- How accessible is ICT to persons with disabilities and what roles does it play in the lives of persons with disabilities? Is there a digital divide that can further create an uneven distribution of benefits through technology adaptation?
- Are the technical standards in the country on a par with universal accessibility requirements? Are there requirements to promote interoperability with assistive technologies?
- If developing a new ICT system, do the licensing conditions include accessibility clauses/requirements? Do public procurement rules mandate accessibility?
- Are stakeholders aware of the scope of accessible ICT solutions and qualified to use the ICT to further promote disability inclusion?
- Are ICT solutions available in local languages (that is, local language text-to-speech and voice recognition software)?
- Is the project's website accessible?

Health, Nutrition, and Population

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are there procedures in place to ensure that patients give consent before major medical procedures?
- Are facilities accessible including diagnostic tools, examination tables, medical equipment, hygiene and sanitation, and physical therapy and treatment centers? Is there accessible transportation to

clinics and rehabilitation centers? Is the distance to these health centers reasonable? Is there a central location for all specialties or is it cumbersome to get integral health care?

- Is information relating to health (including diagnosis and treatment) accessible (that is, large print, materials in Braille, large print, simple language, sign language interpreters)? Are there any legal or administrative constraints that do not allow persons with disabilities to make or participate in decisions about their treatment and care?

- Do the administrative procedures recognize the potential need of additional time for the care and attention for persons with disabilities?

- What procedures exist to protect confidentiality of data—particularly given that personal assistants or sign language interpreters might be present?

- Do persons with disabilities utilize to the same extent preventive services (including prenatal and postnatal care, dental hygiene, screenings for chronic diseases and health check-ups, etc.)?

- Is there a non-discrimination policy for access to services? Are health care professionals and community workers sensitized and trained?

- Are there barriers to health literacy? Do public health promotion awareness and prevention campaigns (that is, vaccination, free HIV testing, sex education programs, obesity prevention activities, etc.) take into consideration the differentiated needs of persons with disabilities (that is, accessibility of venues, not waiting in lines for hours, outreach)?

- Are there self-help groups to provide a social support system?

- Are mental health services accessible?

- Are there protocols regarding the safety of patients with disabilities against sexual and gender-based violence and physical abuse?

- Are there any options that reduce or remove out-of-pocket payments for persons with disabilities who cannot afford health care services?

- Are there alternative service delivery models (that is, community-based rehabilitation, in-house visits, mobile clinics, targeted services to persons with disabilities)?

- Is health care surveillance data disaggregated on the basis of disability?

- Is medical assistance and long-term rehabilitation available for postoperative patients to avoid or reduce long-term impairment?

- Is the quality of pre-, peri-, and postnatal care adequate to prevent disabilities?

- Is bad nutrition a potential risk for increasing the prevalence of disabilities?

- Are medical treatments (that is, antiretroviral therapy) prioritized for persons without disabilities?

- Are the differentiated nutritional needs of persons with disabilities considered in nutrition programs?

Transport

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are bus drivers, taxi drivers, station agents, and other transport staff trained to address the needs of passengers with disabilities?

- Is there a mandate for accessibility of public transportation infrastructure and services (that is, raised boarding platforms, wheelchair anchoring, measurement of platform gaps, adequate visual

environments)? Is there accessibility throughout the travel chain (that is, pedestrian access, vehicles, transfer stations)?

- Are there special transport services for persons with disabilities?

- Is there an estimate of the additional spending that persons with disabilities need to incur to access transportation? Is there subsidized access to transport?

- Are parking facilities accessible?

- Is information accessible (that is, timetable information, disruption of services, changes in routing, safety alerts)?

- Is the pedestrian environment accessible, particularly in the immediate surroundings of stations (that is, pavements are well maintained, overpasses and underpasses are fully accessible, hazards have been removed for people with visual disabilities, and attention is given to traffic patterns and behaviors that pose risk).

- Are operating procedures and rules working against the need to assist persons with disabilities (that is, the need to keep to a strict and rigid schedule that might lead to not stopping at a bus stop for a passenger with a disability or not using the accessibility features; regulations regarding overcrowding buses)?

- Are road safety measures robust to prevent accidents that could lead to a person becoming disabled?

Water

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are water and sanitation facilities and services accessible (that is, smaller-sized water containers; ramps, rails, and guide ropes to water points; latrine doors are wide and space large enough to accommodate a wheelchair and a caregiver to assist; low-level hand-washing facilities; water points are not far away)?

- Is the accessibility of water resources (including drinking, sanitation, hygiene, and irrigation) dependent upon others and thus increases risks of sexual and financial exploitation and deterioration of health and hygiene practices?

- Are there administrative measures to ensure accessibility (that is, separate queues or accelerated access) to minimize wait times or bringing the distribution points closer (that is, through outreach or community-based volunteer services)?

- Is there consideration of the quantity of water for those who might have increased water needs (that is, to manage a particular health condition)?

- Are there measures to protect against sexual and gender-based violence as part of the design of the water and sanitation facilities?

- Do persons with disabilities need to pay disproportionately more out-of-pocket for structural modifications and adapted equipment to access water resources?

- Are staff qualified to conduct infrastructure accessibility and safety audits?

Governance

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are there infrastructural barriers that impair the ability to access governance processes and government services?

- What are the barriers to achieving financial inclusion? Are there administrative barriers that stem from the misperception of the inability of persons with disabilities to handle personal finances?
- Can ICT be used to reduce access barriers (that is, inaccessible physical locations, distance, increase in privacy)?

Poverty and Equity

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Is there a risk that persons with disabilities will be hidden due to stigma during a census or survey?
- Are the questions for a census or survey appropriate to avoid underreporting a disability? Do the questions focus on functionality and avoid terminology that is culturally insensitive?
- Are enumerators and administrative personnel sensitized to ensure they are respectful, courteous, and understand the diversity of disabilities?

Social Protection and Labor

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are persons with disabilities overrepresented in the informal sector? Is there occupational segregation that might lead them to work in lower-paying jobs or high-risk environments?
- Is there a wage gap between persons with disabilities and their peers? And within this, is there a gender gap?
- Is the lack of accessible water, sanitation, and hygiene facilities a barrier to employment?
- Are social protection systems creating a perverse incentive for persons with disabilities to leave the workplace?
- Are there physical barriers (that is, work setting, job interview location, social events, travel requirements, hygiene and sanitation facilities, transportation)? Is the information provided accessible and/or are employees given reasonable accommodations?
- Are there internal biases and/or external misconceptions about the ability of some persons with disabilities to perform a job? This could particularly apply for persons with mental disabilities (for example, schizophrenia).
- Is there overprotection in labor laws that puts employees with disabilities at a disadvantage (that is, shorter working days, more rest periods, longer paid leave, and higher severance payment independent of an assessment of their need)?
- Are there quotas that mandate the hiring of persons with disabilities?
- Are there sheltered employment or employment agencies that support the hiring of persons with disabilities?
- Are mainstream vocational guidance and training programs accessible to persons with disabilities?
- Is the distribution of subsidies or cash support programs done in an accessible venue (that is, physically accessible, without long lines)? Are there outreach programs to target persons with disabilities?
- Are there rehabilitation programs that support returning to work after becoming disabled?
- Are supervisors and human resource personnel qualified to address the needs of employees with disabilities (including in providing reasonable accommodations and non-discriminatory practices)?

- Is there a risk that persons with disabilities will be hidden due to stigma during a registration program for obtaining benefits and/or a program to provide ID cards?

- Are there disability-targeted transfers? If not, is it advisable/feasible in the context?

- Is there a process to register as a person with a disability? Is the certification inclusive of different types of disabilities? Is the process accessible?

Social, Urban, Rural, and Resilience

SCOPING AND ASSESSMENT QUESTIONS TO UNDERSTAND BARRIERS

- Are sirens and alerts (that is, during flooding or earthquake) accompanied by other means to alert those with hearing disabilities (for example, text message alerts)? Is signage in a format that would not allow those with visual disabilities to navigate new surroundings?

- Are there physical, institutional, or attitudinal barriers to access basic services (that is, camps, food distribution points, shelter, toilets, showers, tents, temporary emergency shelters)?

- Are there specialized services (including community-based services) for those with specific needs?

- Are resettlement options considerate of the differentiated needs of persons with disabilities (that is, accessible housing that allows independent living, considerations for loss of networks, proximity to rehabilitation or other health services, specialized care to handle the transportation of medical equipment; decision should be made by the person affected with the support/advice from caregivers)?

- Are the differentiated nutritional needs of persons with disabilities considered in food relief programs?

- Do building codes incorporate accessibility requirements? Are these followed in urban planning and public works programs?

- Are the means of delivery of in-kind support appropriate for persons with disabilities (for example, large and heavy items to carry for persons with mobility constraints)?

- Are outreach social safety net programs designed to reach persons with disabilities?