



A New Financial Access Frontier: A Framework for Disability Inclusion

Implementation Guidelines for Microfinance
Institutions Seeking to Close the Financial
Inclusion Gap for Persons with Disabilities

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Preface

This Disability Inclusion Framework is intended to help microfinance institutions (MFIs) and other providers of financial services at the base of the pyramid to address a dramatic inclusion shortfall: persons with disabilities (PWD). It is based on the white paper “A New Financial Access Frontier: People with Disabilities,” which puts forth an inclusion roadmap developed with guidance from leaders in both the microfinance and disability inclusion communities. The white paper identifies and explains the major areas financial institutions serving the base of the pyramid need to address to achieve PWD inclusion. This framework, is a companion piece designed for organizations that have made a commitment to disability inclusion and seek guidance on how to achieve it. The framework integrates our research findings into six pragmatic implementation categories. Additionally, the framework includes first-hand reflections from Fundación Paraguaya, our project implementation partner, on how they have carried out each step.

While by some estimates, PWD make up 15 percent of the developing world’s population, it is estimated that they represent only 0.5 percent of current MFI clients. While some PWD have challenges so severe that economic participation is not feasible, the vast majority (80–85 percent) have the capacity to use and benefit from financial services. Hundreds of millions of PWD who could become viable microfinance clients are unserved. The impact we seek at the base of the pyramid is impossible unless we reach and empower this vital and talented customer segment.

The economic case is compelling. MFIs seeking economically sustainable scale can ill afford to leave so many potentially excellent clients untapped. In addition, up

to 40 percent of current MFI clients are projected to acquire a disability by age 65. Therefore, augmenting disability inclusion capabilities is critical to any MFI’s growth and retention strategy.

This framework has been developed to help MFIs close this inclusion gap and thereby embrace a profound dual-bottom-line opportunity. Our work has been inspired and informed by pioneering analysis and implementation efforts by trailblazing organizations that deserve our recognition and gratitude. They include Handicap International, the Ecuadorian MFI D-MIRO, and the Association of Microfinance Institutions of Uganda. We celebrate their work and provide links to it later in this document. To date, a standard model and toolkit to guide MFIs through the entire disability inclusion process has been missing. This framework reflects emerging good practices from around the world and has been further validated in the field by our implementation partner, the award-winning MFI Fundación Paraguaya.

Field Implementation: The Framework “Stress Test”

Creating a good practices framework is one thing. Being confident that it is ready to share with the wider financial inclusion community is quite another. This is why we reached out to the highly regarded and innovative MFI, Fundación Paraguaya, to help us distinguish between what works in theory and what holds up in the field. This partnership is in its second year, and we still have much to accomplish. However, we now feel ready to share our learning to date and solicit feedback from industry stakeholders.

Our fundamental takeaway is that while disability inclusion is challenging, it

While disability inclusion is challenging, it is also achievable. We have also confirmed that it cannot be approached solely as a traditional project with a start and end date. While deliverables and timeframes are crucial, authentic and sustainable success requires integrating disability inclusion principles and practices into an institution's mission, goals, and ongoing operations.

is also achievable. We have also confirmed that it cannot be approached solely as a traditional project with a start and end date. While deliverables and timeframes are crucial, authentic and sustainable success requires integrating disability inclusion principles and practices into an institution's mission, goals, and ongoing operations. If this feels daunting, it shouldn't. We have also learned how powerful and effective an incremental approach to inclusion can be. Installing the first handicap access ramp at headquarters, directly involving the disability community in your planning process, or featuring current PWD clients in promotional materials can all have real impact and help build momentum for further progress. For more details on the Fundación Paraguaya project please see our latest project updates in the boxes below or contact us directly. We would love to hear from you.

Project Status and Next Steps

Our initiative in Paraguay is still a work in progress, but we are excited about the process model, tools and trainings that we have developed and think they can play a role in helping other MFIs around the world gain traction in disability inclusion. All of these tools are available at the Smart Campaign's Website for free download in English, Spanish, and French. For example, Handicap International has developed and delivered a world-class disability inclusion training program for MFI staff.

We are also delighted about the partnership we have established with the industry-wide Smart Campaign. This global initiative is committed to ensuring that the widely-endorsed Client Protection Principles are adhered to throughout the microfinance

industry. The Campaign has already incorporated disability inclusion language into its non-discrimination policies.

We are in the process of building a consulting and services network to help MFIs make the transition to full inclusion. Our strategic partnership with Handicap International is the cornerstone of this program, and other talented partners include technology experts F123 and G3ict, physical accessibility specialists Libre Acceso and, in India, v-shesh, which provides support services for persons with disabilities. We have worked directly with all the organizations in our resources network and can vouch for their professionalism and the outstanding quality of their work.

Our next phase involves expanding the number of MFIs we are working with around the world. On this front, we recently launched disability inclusion programs with three MFIs in India. We encourage you to reach out and consider joining us as we continue to scale up this program. We have taken some important steps forward in the last several years thanks to the dedication and insights of our strategic partners. But now we need for more MFIs and disability community stakeholders to become involved—to test out this model in their local markets, share their experiences, help us make this framework better and thereby advance financial inclusion for persons with disabilities throughout the world.

Six Steps to Disability Inclusion

The six main sections of this document provide implementation details for each of the six main categories of action financial institutions need to take to become welcoming to PWD. They outline the goals, success criteria, resources, and deliverables. In addition, a bibliography at the end of each section highlights related information and resources. This document is intended to serve as a touchstone for the initial project planning that an institution must undertake. Final project scope and resource requirements can only be determined after all initiative partners have had input and provide a formal sign off. This will differ from among countries and institution to institution but we hope this template will serve as a practical guide for getting started.

This framework introduction was guided and inspired by the research and organizations highlighted below. The document Appendix provides a more comprehensive listing of sources.

Ensuring Successful Implementation

The box below highlights the most essential ingredients that need to be assembled prior to launching any MFI disability inclusion program. Many of these points represent the kind of preparation needed to ensure the success of any organizational change project. We find them especially salient for projects involving PWD, call on the organization to consider a wide range of diverse changes (ranging from physical changes to attitudinal change to process change) across multiple organizational areas. The points do not reflect everything required, but it does put your project on a firm foundation. Having this in place is critical to addressing every Framework category discussed in the remainder of this document.

As the boxes in the sections below emphasize, the Fundación Paraguaya has been our implementation partner for this Framework. Fundación Paraguaya has done its best to make progress on each of the Framework Categories, but it is important to realize that it may not be feasible to target all the categories and deliverables at once. Part of the process is determining the highest priorities and being honest about resource limitations. A realistic plan and process can then unfold.

Steps to Disability Inclusion

1. Universal Design and Reasonable Accommodation
2. Partnership with Disability Organizations
3. Human Resources Policy, Practices and Disability Inclusion Staff Training
4. Legal Framework
5. Technology-Enabled Inclusion
6. Financial Capabilities

This document is intended to serve as a touchstone for the initial project planning that an institution must undertake. Final project scope and resource requirements can only be determined after all initiative partners have had input and provide a formal sign off. This will differ from among countries and institution to institution but we hope this template will serve as a practical guide for getting started.

Related Documents

- ✘ Roy Mersland, Nakabuye Bwire, and George Mukasa, “To Mainstream Microfinance Services for Persons with Disabilities—Lessons Learned from Uganda,” *Disability Studies Quarterly* Vol. 29 (1). 2009.
- ✘ Handicap International, “Good Practices for the Economic Inclusion of Persons with Disabilities” (2006).
- ✘ United Nations, “Convention on the Rights of Persons with Disabilities.”
- ✘ Center for Financial Inclusion at Accion, “A New Access Frontier: Persons with Disabilities,” (2010).

Organizations We Work with to Advance Financial Inclusion for PWD

- ✘ Center for Financial Inclusion at Accion
- ✘ Center for Financial Inclusion Disability Program
- ✘ AMFIU
- ✘ D-Miro
- ✘ G3ict
- ✘ Trickle up
- ✘ Fundación Paraguaya
- ✘ Hándicap International
- ✘ Smart Campaign

Disability Inclusion Key Project Success Factors

- 1. Secure senior management buy-in.** This must include having statement of commitment from the MFI and a champion within the organization who is vocal about commitment to this initiative.
- 2. Have the right project manager on board from the very beginning**—and make sure the manager has enough time to dedicate to disability inclusion.
- 3. Find experienced and respected disability organization partners who are willing to invest significant time and energy to make this work.** Industry peers and government agencies can play a role too.
- 4. Make sure all internal and external stakeholders are on the same page regarding resource requirements, scope, and timeframes.** This will require a detailed project plan and regular progress updates.
- 5. Bring in specialized consulting resources when the required expertise is not in-house.**
- 6. Get PWD directly involved in the project**—and look to your current PWD clients and staff first.
- 7. Do not try to do too much at once and celebrate every small step.** Be totally honest when things are not going according to plan, and focus on fixing any problem not assigning blame.
- 8. Make sure the changes you enact are sustainable and scalable,** not just quick fixes that will not stand the test of time.

Universal Design and Reasonable Accommodation

In the past 20 years, a wide variety of pragmatic design and physical space modifications have emerged to make workplaces more disability-accessible. Today the biggest disability inclusion opportunity involves sharing these universal design and reasonable accommodation principles and practices throughout the developing world. Below is a list of specific steps that need to be taken to realize universal design and reasonable accommodation¹ objectives.

This action plan should be customized by each MFI and their partners to suit local needs and circumstances. Closing the digital divide, so persons with disabilities have full access to online and mobile resources, is critical and is discussed in Framework Category 5: Technology Enabled Inclusion.

Ultimate Goal

PWD have full and complete access to MFIs, including their built environments, and product delivery channels.

Project Objectives for this Framework Category

- ▣ PWD physical barriers are understood and addressed or are in the process of being addressed.
- ▣ Disability inclusion best practices are being integrated into the design of all MFI facilities, products, and services in accordance with reasonable accommodation and universal design criteria.

Universal Design and Reasonable Accommodation Implementation Task List

MFIs should require that all new buildings (e.g., bank branches) be designed in accordance with universal design principles (and that leased office space be accessible.) Using universal design from the start is often quite inexpensive, especially in comparison to retrofitting a facility after the fact.

When it comes to retrofitting, universal design solutions to overcome access barriers must encompass a wide range of disability including mobility impairments, sight, and hearing disabilities. The installation of ramps and remodeling of lavatory facilities is a necessity for people with special mobility needs. Making information available in Braille is important for the blind and having other alternative formats such as video with closed captions and delivery facilities. Low-cost solutions that answer the needs of large numbers of potential clients should be the first to be implemented.

Reasonable accommodation for staff means, for example, making adjustable desks available to those who need them and providing screen readers to blind employees, as long as cost to do this are reasonable not prohibitive.

- 1) The first step will be a disability access audit, which is a specialized inspection of the built environment at head office and representative branches and outlets.

Specialized resources required: Universal design expert, to lead the audit and subsequently support design and implementation.

¹ **Universal design** is commonly understood to mean designing all products and the built environment to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life. **Reasonable accommodations** means 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.



2) Pilot audit at home office and/or at a single branch office and incorporate lessons into final audit design.

3) Conduct accessibility audit at remaining branches.

4) Identify and prioritize accessibility gaps for the home office and branch network based on the audits and identify actions that would correct gaps.

5) Develop an accessibility retrofit implementation plan, including prioritization, timeline and budget for all existing branches and facilities. Begin with highest priority and lowest cost retrofits.

Specialized resources required: Contractors to eliminate or mitigate physical access barriers.

6) Develop and launch a universal design and reasonable accommodation training program for headquarters HR staff and then roll out to other appropriate staff members. Staff should be aware of the things they can do to create an accessible workplace even when major changes to the built environment may be too costly.

7) Develop and adopt universal design standards and specifications for all new branches and facilities. Ensure that universal design is given high priority in office space leases and/or construction blueprints.

8) Identify and complete all high priority MFI facilities retrofits.

9) Conduct follow-up accessibility audit to evaluate program success and shortfalls.

Related Documents

- The Americans with Disabilities Act.
- The ADA checklist for Readily Achievable Barrier Removal.
- Libre Acceso, “Assessment of accessibility and recommendations in buildings occupied by Fundación Paraguaya.”
- United Nations, “Convention on the Rights of Persons with Disabilities” (in particular Article 9–12).
- Commonwealth Bank, “Disability Action Plan.”
- U.S. Department of Labor, “Business Strategies that Work” (2012).
- Nasscom Foundation, “Inclusivity at the Workplace.”

Support Organizations

- Libre Acceso
- Institute for Human Centered Design

In the past 20 years, a wide variety of pragmatic design and physical space modifications have emerged to make workplaces more disability-accessible. Today the biggest disability inclusion opportunity involves sharing these universal design and reasonable accommodation principles and practices throughout the developing world.



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Implementation Insights from Fundación Paraguaya:

- ❑ Disability Inclusion is not reached overnight. It is a long process that requires awareness raising, a better understating of disability barriers, financial investment, and more. It is important to understand that reasonable accommodation may simply start with the willingness and ability of a cashier to step outside the box when a person in a wheelchair cannot reach the window because it is too high, or a guard or loan officer helping a client access an office when there is no ramp. Once attitudes are changed, many physical barriers become less significant.
- ❑ Building a first ramp can be an important sign of commitment to staff and the disability community, as it proved to be at FP.
- ❑ External consultants are needed to explain universal design/reasonable accommodation standards, conduct accessibility audits, and help set reasonable project goals. At Fundación Paraguaya, an architect from Libre Acceso A.C. (a Mexican organization that promotes the elimination of physical, social, and cultural barriers to people with disabilities) audited four offices and made basic recommendations to reach the minimum standards of accessibility. Fundación Paraguaya's meeting rooms, restrooms, work spaces and other facilities were deemed inaccessible, and some recommendations were made to the effect of making the spaces more adequate for PWDs, such as secondary access ramps, restroom adaptation and reconfiguration of work spaces and public facilities. View the "Libre Acceso" report.
- ❑ As much as possible, it is important to involve local institutions because it promotes and expands social awareness on disability. Fundación Paraguaya partnered with the School of Architecture at the National University of Asunción. Students from the course "Inclusive Design" conducted accessibility audits in two offices and are in the process of developing retrofit plans.

Partnership with Disability Organizations

Partnering with quality disability organizations is vital to successfully integrate PWD into existing microfinance programs because these organizations offer entrée into the disability community. They may also provide training that strengthens the business capacity of potential clients.

Finding local Disabled Persons Organizations (DPOs)² to work with is one of the first steps to take. DPOs can teach other organizations how to approach disability inclusion in a culturally sensitive way, how to market successfully to the PWD community, how to make an organization welcoming to PWD, and how to identify PWD who have the highest potential to be successful clients. These partnerships are also the best way to honor the international PWD rallying cry “Nothing about us without us.” When implementing each Framework Category, DPOs should be deeply involved. It is a win-win for all stakeholders.

Ultimate Goal

Close working relationships are forged with key disability organizations that advance all aspects of an institution’s disability action plan, from design to implementation to monitoring. These partnerships thrive beyond the project timeline and foster disability inclusion on an ongoing basis.

Project Objectives for this Framework Category

Strong partnerships with a number of leading DPOs support the MFI in the following ways:

- ✦ Understanding disability needs and barriers related to financial inclusion.
 - ✦ Awareness raising and training on disability issues.
 - ✦ Understanding how local laws and customs affect PWD.
 - ✦ Referring people with disabilities who could become clients of the financial institution.
 - ✦ Adaptation of existing financial and educational materials for PWD.
 - ✦ Development of disability-friendly marketing and recruiting materials.
 - ✦ Reviewing processes and procedures from a PWD perspective.
 - ✦ Understanding the differences in providing financial services to persons with different types of disabilities.
 - ✦ Capacity building for local disability organizations related to financial inclusion.
- Implementation Planning:

² In this document, when we use the term Disabled Persons Organization we mean any disability organization, whether membership-based or not.

Tips for Selecting the Right DPO partner:

1. Make sure the organization is well managed.
2. Engage organizations that are oriented towards PWD rights instead of charity/medical assistance work and that are comfortable with an approach that is businesslike and does not require ongoing subsidy.
3. Understand whether the organization has connections to the target market (rural populations/urban poor).
4. Inquire with various stakeholders whether the organization is representative of their membership or has a track record for advocating PWD causes.
5. Understand the financial health of the organization.

A non-comprehensive list of NGOs and UN agencies assisting persons with disabilities can be found here.

5. Develop a market study to understand the current suite of financial products that are the most valuable to the local disability community—e.g. loans, savings, or insurance products.

6. Study whether there is a market for loans for wheelchairs, hearing aids, or other specialized equipment.

7. Identify members of the DPO community who would make good clients now and implement an outreach campaign to attract them.

8. MFIs and DPOs should jointly develop and roll out education programs that address the topic of microfinance and client fit, e.g. create PWD client profiles that define who are (and are not) a likely fit for microfinance products and services.

9. In collaboration with disability organization representatives, design a marketing strategy to reach PWD that includes accessible formats (for more information of accessible formats go to R Category 6).

10. Pilot PWD marketing materials to test effectiveness. Tests to include PWD client surveys and focus groups.

11. Roll out validated PWD marketing materials.

12. Explore creating a national prize with the marketing department to recognize PWD clients who have been particularly successful.

Specialized resources required: Government official or business leader that oversees disability policy to award prize.

DPO Partnership Implementation Task List

1. Appoint a MFI relationship manager as liaison with key disability organization partners.
2. Identify local DPO partner candidates; include rehabilitation centers and organizations that advocate for people aged 60 and older.
3. Establish partnerships with two or three DPOs who will join the project planning team and support accessibility audits, inclusion gap analysis, and the implementation process.
4. DPOs may help the MFI better size the potential PWD microfinance market by sharing or analyzing available research data.

Special Resources Required: Market analysis and segmentation expertise

Related Documents

- ✘ Handicap International, “Good Practices for the Economic Inclusion of Persons with Disabilities” (2006).
- ✘ Washington Group on Disability Statistics, “Understanding and Interpreting Disability as Measured using the WG Short Set of Questions” (2009).
- ✘ World Health Organization, “Community Based Rehabilitation.”
- ✘ Cheryl Frankiewicz and Craig Churchill, *Making Microfinance Work: Managing Product Diversification* (Geneva: International Labor Organization, 2011).
- ✘ Mobility International USA, *Building an Inclusive Development Community* (Washington, DC: Mobility International, 2004).
- ✘ U.S. International Council on Disabilities, “Global Disability Rights Library.”

Support Organization

- ✘ Disability Rights Fund

Implementation Insights from Fundación Paraguaya:

- ✘ Establishing a dialogue between the MFI and DPO sectors is of utmost importance. Financial institutions need outside support to better understand disability and the importance of financial inclusion for PWD. DPOs often lack financial services expertise and are unaware of opportunities for PWD clients.
- ✘ Local organizations are key for long-term support, referral of clients, understanding disability in the local context and the laws that affect PWD. Alliances can improve an institution's ability to work with PWD. Relationships with government leaders are also very important.
- ✘ International organizations like Handicap International can also play a vital role, e.g. in raising awareness, assessing current inclusion levels, and developing training materials for branch staff and senior management.
- ✘ Fundación Paraguaya signed a cooperation agreement with SENADIS, the National Secretariat for the Rights of Persons with Disabilities, a government agency, to provide entrepreneurial education training on business plans, personal and family budgets, and entrepreneurship to a group of 10 women so they could promote new village banks in their communities. As a pilot project, this may provide benefits for how the Fundación Paraguaya engages other PWD as future clients.
- ✘ FP has developed working relationships with several other organizations working in the disability sector. Many of them have participated in awareness training, informational and referral sessions. They include: Fundación Saraki, Fundación Solidaridad, Asociación de Sordos Del Paraguay, Agora Paraguay, Centro de Sordos del Paraguay, ADISSAN, Centro Luis Guanella, APAQUIPEX. The relationships with these DOPs are in their infancy and Fundación Paraguaya will continue to liaise with them as their portfolio of PWD activities is strengthened.
- ✘ Managerial Staff at Fundación Paraguaya participated in a three-day workshop for training in order to hone their skills in the identification of physical disabilities, including the appropriate measurements and evaluation required for wheelchair recipients.

Human Resources Policy and Practices; Disability Inclusion Staff Training

Successful disability inclusion requires staff who know how to be disability inclusive and welcoming to bankable but underserved populations, and leadership in this area must arise from the human resources department. A particularly important way for HR departments to create change is to become proactive in recruiting qualified PWD as staff members. This sends a strong signal to staff as well as the disability community that an MFI is committed to disability inclusion.

Ultimate Goal

The entire MFI staff understands and is committed to supporting the rights and economic viability of PWD. This results in sustained and skillful efforts to reach this market segment and ultimately a significant increase in number of PWD clients and staff.

Project Objectives for this Framework Category

- ▣ Non-discriminatory and disability inclusive language is incorporated into the Code of Ethics and other MFI key policies or documents—consistent with the Smart Campaign’s Client Protection Principles.
- ▣ The MFI staff is trained in disability inclusion best practices and its implications, such that they have general knowledge and awareness.
- ▣ Some MFI staff are able to conduct trainings themselves and raise awareness among peers.
- ▣ As a result of sensitivity training, MFI staff is committed to including PWD as clients.
- ▣ MFI has a clear definition of disability, and an efficient tool to track the number of clients with disabilities and their progress.
- ▣ Hiring standards and policies make way to PWD as staff.

Human Resources/Inclusion Training Implementation Task List

- 1.** Conduct a survey of MFI staff and board attitudes toward disability inclusion at headquarters and all branches—this is critical for developing effective sensitivity training and provides a baseline.
 - Collect and distill current PWD-related HR and training best practices being used at local institutions and from around the world. Use these materials to develop a disability inclusion staff training program.
- 2.** Conduct disability inclusion training with the board and senior management in order to secure management buy-in.
- 3.** Modify existing HR policies such as the code of conduct, the staff book of rules, and current job descriptions that may be creating barriers for PWD inclusion.
- 4.** Promote the importance of PWD inclusion to staff by conducting sensitivity trainings to change negative perceptions or attitudes staff may have towards PWD.



Accion Microfinance Bank, Nigeria

5. Review relevant HR manuals and code of conduct policies to ensure they emphasize non-discrimination related to PWD in clear language, in accordance with Smart Campaign principle on responsible treatment of clients.

Specialized resources required: Review of Smart Campaign performance standards for this principle.

6. Ensure that non-discriminatory language about PWD, people over age 60, and other vulnerable populations is included in new employee orientation materials and refresher training. In addition, make sure disability friendly practices are emphasized in training programs themselves.

7. Develop a “train the trainer” program on disability inclusion and sensitivity training that ensures that training can reach all staff and that capability to train is internalized in the organization.

8. Roll out a disability inclusion training program to all staff.

9. Pilot an internship program for PWD to work at your MFI. Consult with disability organizations and universities to source great candidates.

10. Develop and launch a recruitment strategy to increase the number of employees at all levels who are qualified persons with disabilities.

11. Conduct second-round disability attitudes and practices survey to assess the impact of awareness raising and training efforts.

Related Documents

- ✘ The Smart Campaign, “Nondiscrimination Policy of Fundación Paraguaya.”
- ✘ United Nations, “Convention on the Rights of Persons with Disabilities” (in particular Articles 5.7 and 27).
- ✘ Fundación Paraguaya, “Code of Ethics.”
- ✘ Australian Human Rights Commission, “Developing an Effective Action Plan.”
- ✘ The Smart Campaign, “Smart Note: Hiring Persons with Disability at AccessBank Azerbaijan.”

Support Organizations

- ✘ The Smart Campaign
- ✘ EARN
- ✘ Australian Human Rights Commission
- ✘ Global Partnership on Disability and Development³

³ Subscribe to their weekly digest to learn about employment opportunities and consultants and weekly developments in the disability world by emailing GPDD@LISTSERV.SYR.EDU

Implementation Insights from Fundación Paraguaya:

- ✘ It is advisable to benchmark your MFI's current state and attitudes toward disability inclusion before developing implementation efforts.
- ✘ Spreading the word internally is important. All employees must participate in the training in order to create awareness and a sense of commitment.
- ✘ Most MFIs will already be working with clients with disabilities “by accident” or through front line staff who favored disability inclusion prior to project implementation. Examples of such clients make a big difference in making the case for inclusion and illustrating practices that address the needs of PWD clients.
- ✘ It is important, as part of the awareness raising training, to help staff better identify clients and potential clients with disabilities. Not all disabilities are obvious e.g. persons with psychosocial disorders. Presently, the only way to track the number of PWD Fundación Paraguaya serves is through an inconsistently answered survey sent to branch managers. The inconsistency may be a result of the criteria used by the different loan officers/staff involve which could differ based on their understanding and perception of PWD. Fundación Paraguaya will strive to have consistent criteria for all office managers to identify and measure the number of PWDs it serves.
- ✘ Financial institutions generally have branches spread around the country, and bringing employees together can be a difficult task. For this reason, and to ensure long term continuity, designating key individuals who can train their co-workers and serve as resources for disability inclusion issues is necessary.
- ✘ Handicap International conducted an assessment of disability inclusion at Fundación Paraguaya, delivered awareness training for all managers, and conducted “train the trainer” sessions for key staff members on identifying PWD. They also conducted training focused on human resources and the inclusion of PWD as employees. The following materials resulted from this work:
 - ✘ A guidebook to help staff identify people with disabilities
 - ✘ Focus group guidebook
 - ✘ Revised sensitivity training guidebook
 - ✘ A guidebook to help MFIs establish a disability policy
 - ✘ Recommendations for adapting Fundación Paraguaya's procedures manual and a handbook for decision-makers
 - ✘ HR training modules and a handbook for recruiting PWD
 - ✘ Field manager training modules and
 - ✘ A handbook for recruiting and incorporating PWD in the workplace
- ✘ The plan is for designated staff members to become our core disability inclusion resources who will conduct awareness training sessions and help front line staff to identify PWD.

Legal Framework

FRAMEWORK CATEGORY

4

Understanding the legal context within which an MFI operates internationally, nationally, and locally is a necessary step in disability inclusion. The Convention on the Rights of Persons with Disabilities (CRPD) provides a basic framework. The UN CRPD has been signed by 155 countries and ratified by 130 countries.⁴ Has the country signed and ratified the Convention? Has the country begun to harmonize its local laws with the provisions of the CRPD? If so, what are the legal requirements for compliance? Financial institutions need to know, for example, the laws governing legal capacity. For example, do PWD have the right to open bank accounts? Do social welfare laws discourage PWD from using financial services because they may lose social welfare benefits? Changes in the law need to be monitored by legal counsel. Countries that have not yet harmonized local laws with CRPD treaty obligations may soon do so. Partner DPOs will have a good idea of the current laws for PWD, and can advise on implementation. If laws are problematic, institutions may even want to connect with authorities to suggest changes.

Ultimate Goal

All international and local legal requirements related to disability inclusion and economic citizenship for PWD are understood and fully reflected in the organization's operations. Significant gaps in legal protections and supports for PWD financial inclusion have been identified. Where possible, the organization engages in dialogue to promote changes.

Project Objectives for this Framework Category

- ✦ Active compliance with international and local laws and government policies related to disability inclusion in general and as they pertain to financial services.
- ✦ The MFI is ready to support efforts by the disability community to achieve equality before the law in the financial sector, such as achieving “legal capacity” for PWD as it pertains to financial inclusion.

Legal Framework Implementation Task List

1. Assign an MFI staff member(s), such as in-house, to be responsible for staying abreast of legal requirements and for organizational compliance. This will require literacy in international and national disability requirements.
2. Produce or obtain an analysis of your country's laws and government policies related to PWD with a focus on identifying what is necessary to be in compliance. It should shed light on the following specific issues:
 - a. Determine ways in which current laws may undermine progress towards PWD inclusion.
 - b. Identify major gaps between current MFI practices to PWD and what is mandated by law—and what this means to financial institutions and how they can use law and public policy to support their efforts at addressing current existing shortcomings to become more disability inclusive.

⁴ Click here to see a list of countries who have signed and ratified the convention.

c. Understand social welfare benefit guidelines and how they apply to PWD. In some countries, for example, disability benefits are taken away if self-employment opportunities are pursued.

d. Understand local laws related to “legal capacity” to ensure that PWD are entitled to manage their own affairs, including entering into formal financial arrangements.

e. Assess the laws and policies toward providing financial services to people over age 60 (many of whom may have a disability or may develop a disability).

Specialized resource requirements:

Representative of senior citizen rights and support organizations

3. Implement any necessary changes in internal policies to ensure full compliance with existing local and international laws, regulations and treaty obligations.

4. Support disability organizations in the development of training modules for their constituents related to PWD rights under local disability law and the Convention on the Rights of Persons with Disability regarding work and employment issues. *[Optional for organizations that want to go one step ahead]*

5. Develop and implement an advocacy plan with disability organization partners or support the plans of others to seek enhanced enforcement of the country’s disability laws and/or their improvement—both as they relate to financial inclusion and discrimination more broadly in accordance with CRPD. *[Optional for organizations that want to go one step ahead]*

6. Forge a relationship with government authorities charged with monitoring enforcement of the CRPD and its optional protocol.

Related Documents

✘ United Nations, “Convention on the Rights of Persons with Disabilities” (in particular Articles 12, 13, and 14.

✘ Michael Fembek, Thomas H. Butcher, Ingrid Heindorf, and Caroline Wallner-Mikl, *Zero Project Report 2013* (Austria: Zero Project, 2013).

Support Organizations

- ✘ Blue Law International
- ✘ Harvard Law School Project on Disability
- ✘ Disability Rights Fund
- ✘ Disability Rights International
- ✘ Zero Project

Implementation Insights from Fundación Paraguaya:

In Paraguay, the legal community’s literacy level on disability is low, making it challenging to institutionalize the CRPD. Although much progress has been made through advocacy, the CRPD is not fully implemented. All signatories to the CRPD, including Paraguay, made a commitment to the requirements of the convention, but how its demands are operationalized varies country by country. One size does not fit all—every country has different legal structures and processes.

To date, some challenges faced by Fundación Paraguaya have included:

✘ Determining a definition of PWD that allows a loan officer or other employee to accurately identify PWD. In Paraguay, a disability card is not issued for PWD as it is in some other nations. A certificate issued by SENADIS is given to those who take an examination to seek employment. However, availability of such certificates is concentrated in the capital city Asunción and does not reach many other areas.

Technology-Enabled Inclusion

People without access to technology have different life outcomes on a number of important dimensions—and PWD are particularly at risk of being left behind if technology products are not designed with accessibility in mind. It is much less expensive to design a product to be accessible than having to retrofit it once it has been developed. The good news is that many technologies used for ordinary business, including the delivery of financial services, make inclusion of PWD easier, and costs are coming down on assistive technology tools like screen readers, and many low-cost alternative technologies already exist. Some technology firms are assuming leadership positions related to accessibility and therefore more phones and ATMs have assistive functionality. Even if technology utilization in your country is still relatively low—it won't be for much longer.

Ultimate Goal

PWD seeking to be clients or staff can use the MFI's technologies to receive services or perform their duties, and this result is achieved cost-effectively.

Project Objectives for this Framework Category

- ☑ Disability inclusion is seamlessly integrated into your MFI's technology strategy.
- ☑ Disability inclusion technology requirements are operationalized in day-to-day decisions related to procurement and product selection.
- ☑ All new technologies and delivery channels adopted by MFIs are designed to address the needs of clients with disabilities, so far as feasible.

Technology-Enabled Inclusion Implementation Task List

The implementation of processes does not depend on a single individual or program, but must be taken up holistically by the MFI, as discussed by Fernando Botelho in "Inclusion of Persons with Disabilities in Microfinance through Organizational Learning and the Strategic Use of Low-cost Technologies." An MFI must do an assessment of the various technologies both hardware and software that are available to use either under license or through freeware to facilitate disability inclusion.

In addition, G3ict's book *The Accessibility Imperative* presents the challenges and opportunities of implementing the Convention on the Rights of Persons with Disabilities in matters of accessibility to information and communication technologies. It should be consulted by IT developers and systems managers to understand the needs of PWD.

1. Identify internal technology inclusion champion in the IT department to drive increases in PWD accessibility.
2. Conduct a disability inclusion technology audit at MFI offices.

Specialized resource requirements: Consult with specialists in assistive technologies (those with knowledge of accessible websites, screen readers and adjustable desks) to support plan implementation on how to adapt technology to design financial products that will maximize outreach to the PWD population, including the deaf and the blind.

Assistive Technology Options:

- ▣ Computer Access Aids such as screen Readers for staff
- ▣ TTY Technology
- ▣ Accessible ATMs

For a full list of Examples of Assistive Technology, please go [here](#).

Implementation Insights from Fundación Paraguaya:

- ▣ Very few in-house MFI technology teams, including Fundación Paraguaya's, have experience with disability issues or understand how technology can be used to increase inclusion. Outside help can make all the difference in gaining traction.
- ▣ Fundación Paraguaya received a visit from Fernando Botelho, the founder of F123 and a Brazilian specialist in inclusive technologies. Fernando led an in-depth analysis of FP's technology environment and a series of recommendations to take advantage of technology to facilitate inclusion. His report highlighted necessary modifications to our institutional processes and criteria to facilitate people with disabilities becoming part of the institution as clients or employees.
- ▣ FP already has a very promising IT infrastructure from the point of view of versatility, low cost, and accessibility. Its use of LibreOffice internally, gives the organization the ability to hire people that might use Windows or Linux-based workstations. FP's use of MySQL and other free and open source software (FOSS) in its servers makes its systems more versatile in terms of making that information available via SMS messages to the cell phones of clients. In fact, FOSS solutions such as Asterisk or FreeSwitch can assist FP in automating phone-based interactions that gather needed data from FP's internal database and make it available via simple SMS messages, which can be helpful to a large number of persons including those who are deaf or hard of hearing, as well as synthesized or pre-recorded audio, also helpful to a wide variety of clients, including the blind. Read the report.

3. Partner with disability experts and organizations equipped to help prioritize the most urgently needed and achievable technological enhancements.

4. Develop a one year plan to upgrade systems to make your MFI more disability friendly for both staff and clients based on the technology audit above. Identify and act on straightforward and inexpensive improvements first.

5. Implement IT procurement standards that guide ordering new equipment to ensure they comply with universal design standards.

6. Ensure that all delivery channels are as inclusive as is affordable. This will greatly vary by region and availability of technologies.

Related Documents

- ▣ Fernando Botelho, "Making Microfinance Institutions Disability Accessible," F123.
- ▣ G3ict, *The Accessibility Imperative*.

Support Organizations

- ▣ The Global Initiative for Inclusive ICTs
- ▣ F123 Technology
- ▣ Information Policy and Access Center
- ▣ IBM Human Ability and Accessibility Center
- ▣ Decque
- ▣ GAATES
- ▣ Accessibility Tech
- ▣ G3ict

Client Financial Capability

FRAMEWORK
CATEGORY

6

The literacy rate (let alone the financial literacy rate) among PWD is much lower than the average among the population. This includes all PWD, not just the blind and the deaf. While it is not always the mandate of microfinance organizations to provide these services, financial education and capability training can enhance the economic citizenship of the clients they serve, improving their capacity to make informed decisions about financial products. High quality financial literacy and business education tools exist and are often available online, but are almost never in accessible formats. The lack of accessible websites makes the problem even worse. As Fundación Paraguaya's example suggests, materials need not be altered substantially to cater to PWD, but accessibility needs must be taken into account.

In addition, to successfully market to PWD, MFI advertising and promotional materials must be offered in accessible formats. This section provides the guidelines needed to start down the road to more inclusive client outreach.

Ultimate Goal

All PWD who are current or prospective clients have the have the financial education they need from MFIs, disability organizations, or other educational providers, to use financial products wisely.

Project Objectives for this Framework Category

- ✎ When available to the MFI, financial education material and business training modules are modified, if necessary, to be useful to clients whose disability does not allow them to use existing materials.
- ✎ MFIs proactively market their financial services (using accessible formats) to the disability community with guidance from disability organizations and educational institutions.

Nicolas Axelrod/Handicap International



While it is not always the mandate of microfinance organizations to provide these services, financial education and capability training can enhance the economic citizenship of the clients they serve, improving their capacity to make informed decisions about financial products. High quality financial literacy and business education tools exist and are often available online, but are almost never in accessible formats.

Financial Capability Implementation Task List

1. The MFI should understand the financial literacy needs of PWD in their community. An accessibility audit can be done in partnership with disability organizations in order to appreciate local market priorities and constraints. Current PWD clients can help MFIs to develop ways in which they can be better served.
2. Identify relevant educational content that can be leveraged for this initiative by reviewing current non-PWD accessible training materials, which may include materials designed for staff as well as clients and materials available locally or globally.
3. Reach out to local educational and disability institutions to better understand their PWD-related priorities and explore how you might work together to address common goals.
4. Develop a PWD-accessible suite of financial and business literacy modules. These educational tools can be delivered by the MFI, disability organizations, and/or educational institutions.
5. Pilot these new PWD business training modules with small groups and leverage client feedback to enhance them.
6. Roll out these training modules more broadly after incorporating pilot session feedback.
7. Develop a “train the trainer” program to ensure this program can scale and outlive the pilot stage.
8. Explore creating an annual award for a PWD client who completes your business training and then establishes a successful business.

Implementation Insights from Fundación Paraguaya:

After signing a cooperation agreement with SENADIS, Fundación Paraguaya conducted financial education training for a group of women who in this case did not need any special assistive devices to use the available Financial Education training materials successfully. Fundación Paraguaya will make sure that future clients who need financial education materials are able to obtain them in accessible formats to fit their needs.

Related Documents

- ▣ Dan Kadlec, “Bold New Rule: Students in the U.K. Must Study Personal Finance,” *Time Magazine* (February 14, 2013).
- ▣ Accion International Dialogue on Business Program.

Support Organizations

- ▣ Child and Youth Finance International
- ▣ Making Cents International
- ▣ Aflatoun
- ▣ Paralife Foundation
- ▣ The Solutions Marketing Group

Appendix

Below are links to organizations that have made significant contributions to disability inclusion and are actively promoting the importance of disability inclusion to the building healthy communities. This list can serve as a useful starting point to a more comprehensive literature review. CFI, Smart Campaign, FP collateral, and other relevant documents are also enumerated below.

Related Documents

- ✘ International Labor Organization, *ILO Global Business and Disability Network Annual Report* (Geneva: ILO, 2011).
- ✘ Commonwealth Bank, “Disability Action Plan.”
- ✘ Joshua Goldstein, Keynote Address, Binational Forum about Human Rights of Persons with Disabilities, September 19–21, 2012, Tijuana and Ensenada, Mexico.
- ✘ Joshua Goldstein, Remarks at the United Nations Sixth Session of the Conference of States Parties to the Convention on the Rights of Persons with Disabilities, July 17–19, 2013.
- ✘ Making it Work, “Making it Work Toolkits.”
- ✘ WHO, *World Report on Disability* (Geneva: WHO, 2011).
- ✘ Smart Campaign, “Guidance Document on Non-Discrimination.”
- ✘ Smart Campaign, “How to Develop a Code of Ethics.”

Support Organizations

- ✘ Australian Network on Disability
- ✘ Banco D-Miro
- ✘ Council of Canadians with Disabilities
- ✘ International Disability Alliance
- ✘ Christian Blind Mission
- ✘ Commonwealth Bank
- ✘ Leonard Cheshire International (Edamat)
- ✘ Mobility International USA
- ✘ National Council on Disability
- ✘ Trickle Up
- ✘ Center for Financial Inclusion
- ✘ Making it Work
- ✘ World Institute on Disability
- ✘ Inter-American Development Bank. Beyond Banking Program on Global Sustainability

The Center for Financial Inclusion at Accion (CFI) is an action-oriented think tank working toward full global financial inclusion. Constructing a financial inclusion sector that reaches everyone with quality services will require the combined efforts of many actors. CFI contributes to full inclusion by collaborating with sector participants to tackle challenges beyond the scope of any one actor, using tools that include research, convening, capacity building, and communications.

www.centerforfinancialinclusion.org

www.cfi-blog.org

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