CBM Policy on Accessibility

**Approved by ILT on
15th November 2018**

ACRONYMS

CRPD Convention on the Rights of Persons with Disabilities
DID Disability-Inclusive Development
DPO Disabled People Organisation
HR Human Resources
LCDF Legally Contracted Designated Funding
ILT International Leadership Team

DEFINITIONS

The following definitions are based on **CRPD Article 2**, except for definition on 'Accessibility' which is based on **CRPD Article 9**.

Accessibility means taking appropriate measures to ensure access to persons with disabilities, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

b) Information, communications and other services, including electronic services and emergency services.

Communication includes languages, display of text, Braille, tactile communication, large print, accessible multimedia as well as written, audio, plain-language, human-reader and augmentative and alternative modes, means and formats of communication, including accessible information and communication technology.

Reasonable accommodation 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.

Universal design means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. 'Universal design' shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.

Contents

Foreword

'Accessibility is everyone's responsibility and benefits us all. We all have a key role to play in breaking down unnecessary barriers and exclusions in a manner that benefits all including people with physical, sensory, psychosocial and intellectual disabilities.'

Accessibility is a fundamental human right and fundamental for people with disabilities. It is a precondition to ensuring the inclusion and participation of women, men, girls and boys with disabilities in society on an equal basis with others. It is also an essential condition to realising humanitarian and development frameworks including the **Agenda 2030** Sustainable Development Goals (**SDGs**), the **Sendai Framework for Disaster Risk Reduction 2015-2030** and the **New Urban Agenda** under the core commitment and clear mandate of leaving no one behind.

2018 marks the 10th year of the **Convention on the Rights of Persons with Disabilities (CRPD)** entry into international law – heralding the vision of an inclusive world for all people with disabilities. To mark this occasion, I am delighted to share CBM's updated accessibility policy which is a Federation-wide policy. As an international development organisation with over 100 years' experience supporting and promoting the rights of people with disabilities, CBM is committed to ensuring equal access and participation of all women, men, girls and boys with

disabilities. CBM embraces this updated accessibility policy as a means to demonstrate our accountability to people with disabilities and to reaffirm CBM's responsibility to ensure and promote accessibility based on the principles of universal design in all spheres of our work, in line with the CRPD.

The updated policy has evolved from a period of internal reflection about how CBM can ensure we are meeting the standards set down by the CRPD on accessibility and how we are ensuring accountability to people with disabilities. The policy has been widely consulted upon, drawing in feedback from all parts of the federation.

As CBM, we want this policy to positively inspire change and to give confidence and clarity to our staff and partners in how to deliver high quality work. This policy also might inspire our alliance and mainstream partners to join us in promoting the full and effective participation of all people with disabilities to actively contribute to every aspect of the social, cultural, economic and political life of their communities.

Dr. William Rowland
Chairperson Supervisory Assembly
CBM International

1
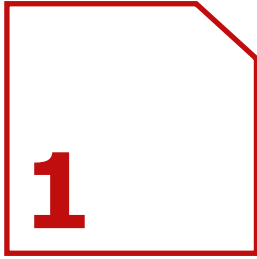
Rationale

It has been ten years since CBM issued its first accessibility policy along with guidelines for promoting access to the built environment and guidelines for accessible communication and information.

This updated policy demonstrates our continued commitment to model accessibility across all functions and levels of the organisation and to promote it amongst our partners. It will help CBM and our partners to further develop the quality of our work to succeed in modelling good practice in line with the CRPD.

With the CRPD, there is a clear expectation from international development agencies leading in Disability-Inclusive Development to promote the rights of persons with disabilities and model accessibility in line with **CRPD article 9**. As a non-state actor and in receipt of funding from government agencies, CBM is expected to comply with **CRPD Article 32 on international cooperation**, stipulating that international cooperation has to be inclusive of and accessible to persons with disabilities. This also applies to the field of humanitarian action where CBM needs to address accessibility and inclusion of persons with disabilities in line with **CRPD Article 11 on situations of risk and humanitarian emergencies**, including the promotion of Disability Inclusive Disaster Risk Reduction (DIDRR) to ensure resilient and inclusive communities.

This policy is also working alongside CBM's **Inclusive Employment Framework**, adopted in February 2017, to ensure participation of our own staff with disabilities and promote inclusion across all our human resource practices: recruitment, retention and professional development of all staff.

The impetus for this policy is that over the past ten years, since the adoption of the CRPD, much has changed within the development and humanitarian sectors. As an organisation, CBM operates in a legal and policy framework which recognises that accessibility is a prerequisite for addressing the full and effective participation of women, men, girls and boys with disabilities to exercise their social, cultural, economic and political rights on an equal basis with others.

The adoption of **Agenda 2030**, with the strap line of 'leaving no one behind' demands that women, men, girls and boys with disabilities must equally be able to access and enjoy the full range of development opportunities alongside peers. Equally, the launch of the **Charter on Inclusion of Persons with Disabilities in Humanitarian Action** at the first

World Humanitarian Summit (Istanbul 2016), and the **Sendai Framework for Disaster Risk Reduction** recognise that humanitarian action must be accessible for all persons with disabilities, engaged as critical stakeholders to the success of emergency response and disaster risk reduction management programmes in every community. Furthermore, the **New Urban Agenda** calls for actions to ensure that cities, towns and villages are inclusive of and accessible to persons with disabilities.

Building on this, CBM has consulted staff and partners, including Disabled People's Organisations, to review our practices in line with the CRPD. This has resulted in the development of this policy based on our joint learning, especially on identification of gaps that need to be addressed to provide accessibility standards and clearer accountability mechanisms for improved compliance of CBM's work in line with **CRPD Article 9** on accessibility and its further guidance in the **CRPD general comment number 2 on accessibility (2014)**.

Building on learnings from the previous policy, CBM wants to succeed within the next five to ten years to ensure that our core systems, practices and programmes are consistently demonstrating good accessibility practice and addressing the different access requirements, needs and preferences of persons with disabilities.

Longer term, the policy aims to address more systemically the need for the effective promotion of **Universal Design**. Addressing Universal Design will effectively place CBM in a position to influence and contribute to more systemic long term change and achieving the vision of accessible and inclusive environments, services, programmes, technologies and products that are equitable and non-discriminatory, healthy and safe, resilient and sustainable, and autonomously usable by all within communities, to the widest extent possible. This will ultimately create the most cost-effective and inclusive planning for sustainable environments for all, in line with Agenda 2030.

As an organisation, CBM operates in a legal and policy framework which recognises that accessibility is a prerequisite for addressing the full and effective participation of women, men, girls and boys with disabilities to exercise their social, cultural, economic and political rights on an equal basis with others.
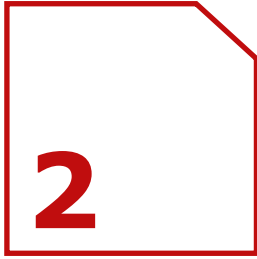
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Purpose

This accessibility policy aims at providing a framework for CBM with a governance and accountability mechanism to monitor and improve our practice on accessibility across all areas of our work: from internal systems and practices to support of partners in delivery of accessible development and humanitarian programmes. This policy guides the delivery of CBM's programme standard on accessibility and universal design, detailed in CBM's Programme Quality Framework (PQF).

This accessibility policy aims to ensure that CBM promotes accessibility in line with the CRPD and that we have credibility as an international development agency working towards Disability-Inclusive Development.
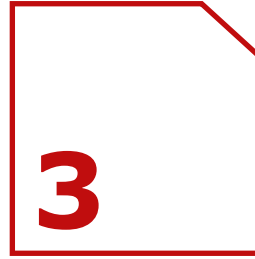
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Scope

CBM's accessibility policy is a Federation wide policy. The policy is applicable to the entire remit of CBM International's work covering:

1. All roles and functions in CBM International including staff across finance and operations, programmes, communications, initiatives, regional hubs and country offices;

2. CBM partners, consultants, contractors and any other third party providing products, goods, services, systems or facilities on behalf of CBM International or as part of programmes funded via CBM International.

The policy is applicable to CBM Member Associations. However, it is understood some Member Associations may need to adapt this policy to meet higher national standards which may be legally binding.

CBM International and Member Associations are jointly expected to promote the policy and support implementation with partner organisations.

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4

CBM's accessibility statement and commitments

CBM's accessibility statement

CBM is committed to promoting equal access and participation of all women, men, girls and boys with disabilities in the countries in which we work. It is CBM's responsibility, in line with the Convention on the Rights of Persons with Disabilities, to ensure and promote accessibility based on the Principles of Universal Design in all spheres of our work. We will do this by meeting seven core commitments.

CBM's seven accessibility commitments

1 Our international, regional and country offices and premises are accessible to all persons with disabilities.

2 Our information and communications, including systems and technologies are accessible to all persons with disabilities.

3 Our procurement of goods, services and facilities include consideration of accessibility criteria and standards.

4 Our staff, partners, consultants, contractors and volunteers are aware of CBM's accessibility policy and receive appropriate support and trainings on accessibility where relevant.

5 Our programmes and services are non-discriminatory and accessible to all persons with disabilities in their communities regardless of age, gender, faith, ethnicity or any other identity characteristic.

6 Our meetings and events are accessible to all persons with disabilities.

7 Our workplaces promote an inclusive and accessible environment that supports all staff to thrive with provision of reasonable accommodation for employees with disabilities, where needed.

5

Contextualising accessibility standards

TAKING INTO ACCOUNT CONTEXT REALITIES

CBM undertakes to meet accessibility standards in recognition of the following context realities:

1. Accessibility is local-environment specific and may not be transferable from one area, region or country to another. However, regardless of context and the varying resources available, the Principles of Universal Design should be applied (**See Annex 1**).

2. There are very different contexts within which CBM works. In each, the highest standards of accessibility should be sought within locally available resources, supporting local economies and enhancing environmentally sustainable development approaches.

CBM recognises that improving practices and achieving quality standards on accessibility cannot be achieved overnight and will be incremental. This will be based on findings of assessments undertaken, working to key priorities according to availability of funding. This is understood as 'progressive realisation' in line with the CRPD. However, it is important to note that where accessibility is not possible, CBM as an employer, has a responsibility to ensure an accessible work environment for all staff with disabilities through provision of reasonable accommodation in response to an individual request. Please see CBM's staff handbook.

WORKING TO IMPROVE NATIONAL ACCESSIBILITY STANDARDS

It is understood that the different contexts within which CBM operates have different national regulations and standards which CBM has to comply with as a registered NGO. CBM commits to comply with minimum national accessibility requirements and exceed these where possible in order to meet CBM's seven commitments in this policy.

National accessibility standards should be measured against the **CRPD Article 9** and **CRPD General Comment number 2** which should be used as the main reference where no adequate national standards are in place.

Where national accessibility standards do not exist, are poor and not in compliance with

CRPD, in the core countries in which CBM works, CBM commits to working with DPOs to advocate change including development and adoption of national accessibility standards and policies.

In situations of risk and humanitarian emergency minimum accessibility standards should be met in line with the **Charter on Inclusion of Persons with Disabilities in Humanitarian Action**. This is in line with **CRPD Article 11** on situations of risk and humanitarian emergencies.

PROMOTION OF INTERNATIONAL ACCESSIBILITY STANDARDS

Where possible CBM will promote adherence with the international accessibility standards listed below:

For the built environment: ISO 21542 Building construction – Accessibility and usability of the built environment.

For digital accessibility: ISO/IEC 40500 (Web Content Accessibility Guidelines **(WCAG) 2.0**) and **European standard EN301 549.**

6
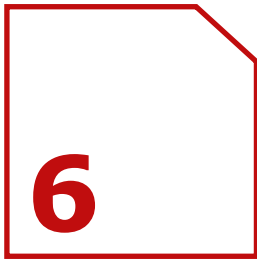
Governance and accountability for the CBM accessibility policy

ADOPTION

- This policy is valid from the date of approval by the International Leadership Team and remains valid until such time as an updated policy is approved to replace it.
- On approval of the policy, the International Leadership Team (ILT) will mandate the International Management Team (IMT) to establish an Accessibility Policy Committee (APC) to oversee delivery of the policy and to support the development and review of the accessibility action plans.

POLICY IMPLEMENTATION

Three-step process of policy implementation

Delivery of the accessibility policy requires offices to follow a three-step process:

1. Accessibility assessment of CBM offices and practices.

2. Development of a three-year accessibility action plan setting realistic targets with budget requests and an agreed responsible focal point person.

3. Regular monitoring, learning and review of action plans.

Three-step process of policy implementation

1 Accessibility assessment of CBM offices and practices

2 Development of a three-year accessibility action plan

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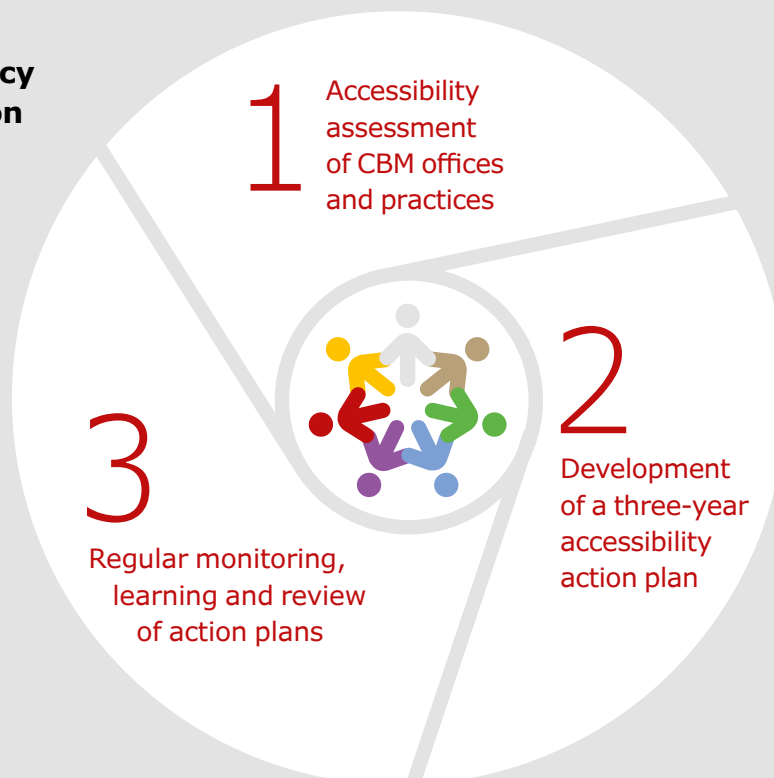
The accessibility action plans will address each of the seven commitments defined in CBM's accessibility statement (see **section 4**) and will be supported with technical guidance from DID advisors and a companion guide, which helps to clarify how to implement the three-step process and what each of the seven commitments requires.

Roll out of policy

The roll out of the policy across CBM International will be undertaken in two phases overseen by the Accessibility Policy Committee:

- An initial phase from 2018-2019 will consist of working with a select number of country and regional hub offices to undertake the three-step process. This will allow troubleshooting of any implementation issues and provide opportunities to learn, build capacity of the advisory support team and refine the companion guide to this policy.
- A second phase from 2020 onwards will see roll out in remaining country, regional and other offices under CBM International.

Member Associations will be expected to take on the review of their offices and practice against the seven commitments, but working to their own time frames and processes. Given that Member Associations do not sit within the CBM International budget system, it is expected that they will use their own annual planning and review systems to take implementation forward. However, it is expected that they will share learning and progress with the APC on an annual basis.

SUPPORT AVAILABLE FOR POLICY IMPLEMENTATION

Technical support

The DID initiative will provide technical oversight to support the delivery of this policy. Global, regional and, where available, local DID advisors will give technical support to offices in development, costing and review of their accessibility action plans.

In the absence of a CBM DID advisor in a given location, the CBM Technical Advisor for Accessibility or other DID initiative team members will provide technical support, or provide links to competent practitioners or partners that can provide this support.

In addition, a companion guide to this policy will be available to provide guidance, practical steps and tools to support implementation.

CBM International's IT team are available to support, troubleshoot and monitor issues that need to be resolved regarding digital accessibility. They can be contacted at CBM's IT help desk: **helpdesk@cbm.de**.

Member Associations can also call upon the DID Initiative for referrals and advice on DPOs and technical partners that can support with the implementation of the accessibility policy if needed.

Resourcing the accessibility policy

Each office will be responsible for costing up their three-year accessibility action plan and submitting a budget to the annual budget cycle.

The Accessibility Policy Committee (APC) will be ready to support CBM International

management and offices on how to prioritise actions when budget availability is reduced. The APC will also advise on how best to schedule implementation of the policy in line with availability of DID technical resources.

Finance and Operations are responsible to verify and ensure that every CBM office has an accessibility budget allocation. This will vary considerably and not be uniform given its dependence on the specific action plan and context realities.

It is understood that CBM will need to prioritise interventions based on: the availability of funding, technical resources and findings of the assessments undertaken.

REVIEW AND MONITORING POLICY

The Accessibility Policy Committee will be in charge of the overall monitoring of the implementation of the CBM Accessibility Policy, including baselining and overall progress of achievements toward the seven commitments.

The Committee will report the progress on an annual basis to the International Management Team and will advise when amendments may be required to the policy based on learning and latest developments.

Each office is responsible for reporting and lodging their three-year accessibility action plan with the Accessibility Policy Committee who will review them prior to annual budget approval and support with prioritisation of actions as needed.

Each office should send to the Accessibility Policy Committee an annual progress report on implementation of their accessibility action plan, including challenges and lessons learned related to the agreed accessibility action plan and any changes in delegation of work, including of focal point person. Templates for this will be available in the accessibility companion guide.

EVALUATING THE POLICY

The Accessibility Policy Committee is responsible for commissioning an evaluation of this policy within five years of adoption.

Findings, recommendations and learning from this evaluation will inform subsequent policy revisions that will in turn be submitted to the ILT for approval.

COMPLAINTS MECHANISM

CBM regular mechanisms for feedback and complaints should be used by staff or partners for any concerns. These are:

- For serious complaints by staff, or for systemic non-compliance, the HR dispute resolution process should be used.
- For regular staff concerns these should be communicated through the line management system.
- For complaints by partners/ external agencies regarding CBM's accessibility, CBM's main complaints mechanisms should be used. These are detailed on **CBM's website** under the accountability and reporting page.

The Principles of Universal Design

Universal Design

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

The authors, a working group of architects, product designers, engineers and environmental design researchers, collaborated to establish the following Principles of Universal Design to guide a wide range of design disciplines, including environments, products, and communications. These seven principles may be applied to evaluate existing designs, guide the design process and educate both designers and consumers about the characteristics of more usable products and environments.

The Principles of Universal Design are presented here, in the following format: name of the principle, intended to be a concise and easily remembered statement of the key concept embodied in the principle; definition of the principle, a brief description of the principle's primary directive for design; and guidelines, a list of the key elements that should be present in a design which adheres to the principle. (Note: all guidelines may not be relevant to all designs.)

Principles of Universal Design are available in **other languages** as provided on other websites, including: Dutch, Italian, French, German, Japanese, Portuguese, Spanish, Swedish.

The Center for Universal Design had no involvement in the translation of the Principles of Universal Design© into other languages. These links are solely provided as a service. If you are aware that the Principles of Universal Design© are available in other languages on the internet, or in the existence of a more 'definitive' version than the one listed, please contact the Center at **cud@ncsu.edu**.

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PRINCIPLE

1

Equitable Use

The design is useful and marketable to people with diverse abilities.

Guidelines:

- Provide the same means of use for all users: identical whenever possible; equivalent when not.

- Avoid segregating or stigmatizing any users.

- Provisions for privacy, security, and safety should be equally available to all users.

- Make the design appealing to all users.

PRINCIPLE

2

Flexibility in Use

The design accommodates a wide range of individual preferences and abilities.

Guidelines:

- Provide choice in methods of use.

- Accommodate right- or left-handed access and use.

- Facilitate the user's accuracy and precision.

- Provide adaptability to the user's pace.

PRINCIPLE

3

Simple and Intuitive Use

Use of the design is easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level.

Guidelines:

- Eliminate unnecessary complexity.

- Be consistent with user expectations and intuition.

- Accommodate a wide range of literacy and language skills.

- Arrange information consistent with its importance.

- Provide effective prompting and feedback during and after task completion.

PRINCIPLE

4

Perceptible Information

The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.

Guidelines:

- Use different modes (pictorial, verbal, tactile) for redundant presentation of essential information.

- Provide adequate contrast between essential information and its surroundings.

- Maximize 'legibility' of essential information.

- Differentiate elements in ways that can be described (i.e., make it easy to give instructions or directions).

- Provide compatibility with a variety of techniques or devices used by people with sensory limitations.

PRINCIPLE

5

Tolerance for Error

The design minimizes hazards and the adverse consequences of accidental or unintended actions.

Guidelines:

- Arrange elements to minimize hazards and errors: most used elements, most accessible; hazardous elements eliminated, isolated, or shielded.

- Provide warnings of hazards and errors.

- Provide fail-safe features.

- Discourage unconscious action in tasks that require vigilance.

PRINCIPLE

6

Low Physical Effort

The design can be used efficiently and comfortably and with a minimum of fatigue.

Guidelines:

- Allow user to maintain a neutral body position.

- Use reasonable operating forces.

- Minimize repetitive actions.

- Minimize sustained physical effort.

PRINCIPLE

7

Size and Space for Approach and Use

Appropriate size and space is provided for approach, reach, manipulation, and use regardless of user's body size, posture, or mobility.

Guidelines:

- Provide a clear line of sight to important elements for any seated or standing user.

- Make reach to all components comfortable for any seated or standing user.

- Accommodate variations in hand and grip size.

- Provide adequate space for the use of assistive devices or personal assistance.

Please note that the Principles of Universal Design address only universally usable design, while the practice of design involves more than consideration for usability. Designers must also incorporate other considerations such as economic, engineering, cultural, gender, and environmental concerns in their design processes. These Principles offer designers guidance to better integrate features that meet the needs of as many users as possible.

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