

Alternative Response to
Switzerland's Official Response to the List of Issues in
relation to Swiss international cooperation and
humanitarian action

Submission by the Swiss Disability and Development
Consortium (SDDC¹)

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¹ The Swiss Disability and Development Consortium (SDDC) was formerly the "Swiss Coalition for the Rights of Persons with Disabilities in International Cooperation". The SDDC includes CBM Switzerland, FAIRMED, Handicap International Switzerland and the International Disability Alliance.

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1. Update and Recommendations for Concluding Observations

This submission by the Swiss Disability and Development Consortium (SDDC) provides an alternative view on the official response by the Swiss Government on the List of Issues submitted on 25 September 2020. It highlights some key gaps where CRPD implementation in Swiss international cooperation and humanitarian action is still lacking. While this submission focuses on the CRPD in relation to its implementation within Switzerland's international cooperation, it takes into consideration the CRPD in its entirety.

Since the last report, the Swiss Agency for Development and Cooperation (SDC) has continued to take positive steps towards making their development and humanitarian work more inclusive of persons with disabilities². This includes:

- First steps taken to develop an action plan for the implementation of the SDDC's 2021 - 2023 roadmap³ to render the SDC's efforts inclusive of persons with disabilities both at institutional and field level.
- Application of the OECD DAC Policy Marker on Disability for 2018 and 2019 data⁴.
- Switzerland joined the Global Action on Disability (GLAD) Network
- Switzerland signed the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action
- Financial support of different NGO programs on disability-inclusive development, notably the SDC's annual programme contribution to the CBM-FAIRMED Alliance "Leave No One Behind" and SDC funds to HI's humanitarian aid and development projects.

We welcome this progress, but caution that these are only initial steps and that significant progress still needs to be made for Switzerland to meet its obligations under the CRPD.

A recently published Factsheet on the disability inclusiveness of Swiss development and humanitarian aid⁵, raises some key concerns on CRPD implementation in Switzerland's international cooperation. It found that:

- there is no consistent approach to disability across Switzerland's work internationally;
- there are isolated projects on disability inclusion, but not a comprehensive approach to ensure all international programmes are disability inclusive;
- there is no requirement for disability disaggregated data.

² By persons with disabilities, we always mean women, girls, men, boys, transgender, intersex and non-binary persons with disabilities

³ SDDC. June 2021. [Roadmap 2021-2023 for the inclusion of persons with disabilities in Swiss international cooperation.](#)

⁴ SDDC. December 2021. [Factsheet: OECD DAC Disability Policy Marker and its application in Switzerland's ODA reporting](#)

⁵ Polly Meeks. September 2021. [Factsheet on CRPD implementation in SWITZERLAND, with a focus on disability inclusiveness of development and humanitarian aid.](#)

In general, there is little evidence of meaningful participation of OPDs in the design, implementation, and monitoring of the CRPD in Swiss international cooperation. This is particularly concerning since the CRPD Committee adopted in 2018 General Comment No. 7 on the participation of persons with disabilities.

According to the OECD DAC disability marker, which Switzerland has started applying to project data since 2018, most Swiss projects don't have any objectives yet on disability inclusion. In 2019, only 2.7% of projects had at least one objective on disability inclusion.

The SDDC's analysis and alternative responses to a selected number of List of Issues, highlight some of these remaining gaps. Each analysis section includes a set of overarching recommendations.

The SDDC has summarized these recommendations in the **following five proposed Concluding Observations for consideration by the CRPD Committee in its Review of Switzerland.**

On Art. 6

- Actively support organizations of women with disabilities, to engage in all Swiss international cooperation and humanitarian initiatives to promote gender equality and ensure their effective participation in the development and review of strategies, policies and programmes for gender equality, including an urgent review of the 2017 Strategy on Gender Equality and Women's Rights of the Federal Department of Foreign Affairs, in line with the Committee's General Comments No. 3 and 7.

On Art. 11

- Adopt an action plan to implement the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action with clear and measurable objectives and indicators including for Disaster Risk Reduction, in close collaboration with and active participation of persons with disabilities and their representative organizations, and in line with the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action.

On Art. 31

- Collect and disaggregate data on disability in all of Switzerland's humanitarian and development programmes, to track their quality and impact and to make sure persons with disabilities in general and specific groups of persons with disabilities are not left behind.

On Art. 32

- Adopt a set of guidelines to inform Switzerland's work on the inclusion of persons with disabilities in its international cooperation work, in line with the CRPD and the 2020 Report of the Special Rapporteur on the rights of persons with disabilities in international cooperation⁶, ensuring the guidelines have measurable and tangible targets and indicators in both

⁶ United Nations General Assembly A/75/186. July 2020. [Report of the Special Rapporteur on the rights of persons with disabilities, Catalina Devandas-Aguilar.](#)

mainstreaming the concerns of persons with disabilities and targeting their needs specifically.

- Adopt measures to ensure the full and effective participation of persons with disabilities and their representative organizations, throughout all strategy, policy, and programme cycle processes regarding Switzerland's international cooperation as well as the 2030 Agenda for Sustainable Development, in line with the Committee's General Comment No. 7.

A comprehensive overview of the SDDC's overarching and more detailed recommendations can be found in [Annex I](#).

2. SDDC analysis on selected Articles related to international cooperation and humanitarian action, in response to the official answer of the Swiss government to the LoI

Purpose and general obligations (arts. 1–4)

1. Please provide information on:

(b) Mechanisms established and the human and financial resources available at the federal cantonal and municipal levels for meaningful consultation with persons with disabilities including persons with disabilities with diverse sexual orientations and gender identities and intersex persons with disabilities through their representative organizations regarding the design and monitoring of legislation and policies aimed at implementing the Convention;

Switzerland's Response

The public consultation procedure allows civil society to express its views on the legislative reforms under way. This is the preliminary phase of the legislative procedure during which the drafts are put for comments to the cantons, the main political parties, the umbrella associations of the municipalities, towns and mountain regions, the umbrella associations for businesses and other interested parties. Anyone, whether invited to or not, can comment on the drafts under consultation. Recently, associations of lesbian, gay, bisexual, transgender and intersex persons and persons with disabilities have expressed their views on the draft revision of the Civil Code aimed at opening civil marriage to all, as well as on the government bill transmitted to Parliament on 6 December 2019 concerning change of sex on the civil register; they will also be able to express their views on the Arslan and Ruiz postulates, which call for the introduction of a third sex category. Under the "Autonomy" programme, the Confederation and the cantons are looking at ways of enhancing the inclusion of persons with disabilities and their organizations in the procedures for drafting and monitoring the implementation of laws.

SDDC Analysis

Switzerland's response makes no mention of how the participation of persons with disabilities and their representative organizations is ensured in the realm of international cooperation. Switzerland's response only refers to mechanisms at the national level, for internal affairs.

However, meaningful participation of persons with disabilities as a guiding principle and main objective of the CRPD should take place across all departments and all agencies of the Swiss government, which at the federal level also includes the Swiss Agency for Development and Cooperation (SDC) and therefore also for external affairs.

SDC, however, does not yet consult in a meaningful way with persons with disabilities and their representative organizations, nor ensure their full and active participation, neither for the development of strategies and policies nor in the development, implementation, monitoring and evaluation of programmes and projects. Direct participation is essential both by Swiss OPDs and OPDs in SDC

project countries, as persons with disabilities are the experts on matters affecting them. In line with General Comment No. 7, it is also key to provide capacity-building, funding and reasonable accommodation to organizations of persons with disabilities so that they can meaningfully participate in such consultations.

Our Recommendation

- Meaningfully consult with persons with disabilities and their representative organizations and actively involve them throughout all strategy, policy and programme processes regarding Switzerland's international cooperation as well as the 2030 Agenda for Sustainable Development.

(See [Annex I](#): SDDC Recommendation Number 3)

1. Please provide information on:

(c) Measures taken to ensure that the process of implementation of the 2030 Agenda for Sustainable Development in and by the State party is inclusive of persons with disabilities;

Switzerland's Response

The rights of persons with disabilities are defined as objectives in the "equal opportunities" thematic area of the 2020–2030 Sustainable Development Strategy, which is currently under development. Public consultation is part of that process and will give a voice to organizations of persons with disabilities.

SDDC Analysis

Switzerland adopted its new Strategy on Sustainable Development 2030 (SSD) as well as the first action plan (2021-2023)⁷ in June 2021. Unfortunately, the rights of persons with disabilities are only treated in the thematic area "equal opportunities and social cohesion", instead of considering them as a cross-cutting and intersectional issues within the entire SSD. Moreover, the action plan does not contain any new measures on the inclusion of persons with disabilities.

On a positive note, the current action plan entails a measure to establish a national human rights institution (NHRI). It is crucial that in its mandate, the NHRI addresses and evaluates the rights of persons with disabilities in its entirety and in an intersectional manner, including with regards to Swiss international cooperation. Furthermore, sufficient human and financial resources need to be provided for the NHRI to carry out its mandate.

The principle of the 2030 Agenda, to Leave No One Behind, is incorporated in the guiding principles of the new SSD and is also explicitly mentioned in one subchapter on "equal opportunities and social cohesion". This needs to be translated into action and monitored respectively. However, the current monitoring does not allow tracking on whether persons with disabilities are included on an equal basis with others, as disaggregation of data along disability is not a

⁷ Swiss Confederation. June 2021. [Strategy on Sustainable Development 2030 and Action Plan 2021-2023](#).

requirement (see also our analysis under Art. 31), nor is there an ex-ante assessment to make sure no one is left behind.

For the implementation of the 2030 Agenda, Switzerland set up an advisory group consisting of representatives from civil society, the private sector as well as science, but still does not include persons with disabilities and their representative organizations in this group. By directly including persons with disabilities in this group, their rights and specific requirements can be addressed and mainstreamed throughout the 2030 Agenda implementation process to ensure no one is left behind, as persons with disabilities are the experts on matters affecting them.

Our Recommendation

- Ensure that the implementation of the 2030 Agenda for Sustainable Development in and by Switzerland respects and promotes the rights of persons with disabilities as a cross-cutting issue and ensures that persons with disabilities and their representative organizations are meaningfully consulted and involved, including by their inclusion in the SDG advisory group.

(See [Annex I](#): SDDC Recommendations 3 and 4)

Women with disabilities (art. 6)

3. Please provide information on the strategies and measures taken to mainstream the rights of women and girls with disabilities, including in international cooperation, and to ensure that all policies and programmes adhere to the Convention and take into account the Committee's general comment No. 3 (2016) on women and girls with disabilities, and the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention).

Switzerland's Response

In force since 1 January 2020, the Ordinance on Combating Violence against Women and Domestic Violence has created the basis for the implementation and financing by the Confederation of measures to prevent and combat the forms of violence covered by the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention). Financial assistance of CHF 3 million could be granted from 2021 onwards in the context of measures to prevent violence against women and domestic violence. The needs of particularly vulnerable persons are taken into account in the priority programmes of the Federal Bureau for the Equality of Persons with Disabilities.

SDDC Analysis

The response by the Swiss Government does not mention efforts in international cooperation, even though this is specified in the Committee's question. The 2017 Federal Department of Foreign Affairs Strategy on Gender Equality and Women's Rights⁸ does not include the rights of women and girls with disabilities and should

⁸ Federal Department of Foreign Affairs (FDFA) Switzerland. 2017. [FDFA Strategy on Gender equality and Women's rights](#).

be reviewed as soon as possible to rectify this omission, to ensure no one is left behind. Also, Switzerland's new International Cooperation Strategy 2021-2024⁹ lacks an intersectional approach.

Women's rights must be viewed and addressed in an intersectional and multidimensional way, acknowledging that women with disabilities are not a homogenous group and rather have multidimensional layers of identities, statuses, and life circumstances.

To ensure an intersectional approach, the SDC should create more synergies between the focal points working on gender and disability.

Furthermore, to ensure the thorough and consistent mainstreaming of the rights of women and girls with disabilities, the SDDC strongly recommends the development of guidelines for the inclusion of persons with disabilities in Switzerland's international development and humanitarian action.

Our Recommendations

- Review the 2017 Strategy on Gender Equality and Women's rights and ensure the inclusion and mainstreaming of the rights of women and girls with disabilities.
- Develop a set of publicly available guidelines to inform Swiss international cooperation's work on the inclusion of persons with disabilities, including women and girls with disabilities. Mainstream their rights across all other strategies in international cooperation, adopting a twin-track approach ensuring that Switzerland's international cooperation efforts reach all persons including women and girls with disabilities both by mainstreaming their concerns and by targeting them.
- Meaningfully consult with persons with disabilities and their representative organizations, especially organizations of women with disabilities and actively involve them throughout all strategy, policy and programme processes regarding Switzerland's international cooperation and provide capacity-building, funding and reasonable accommodation to organizations of women with disabilities so they can meaningfully participate in such consultations.

(See [Annex I](#): SDDC Recommendations 1, 2 and 3)

Situations of risk and humanitarian emergencies (art. 11)

8. Please provide information on measures taken to ensure:

(a) That the disaster risk reduction plan and strategies at the federal, cantonal and municipal levels explicitly provide for accessibility and inclusion of all persons with disabilities in all situations of risk, to adhere to the Convention and in line with the Sendai Framework for Disaster Risk Reduction;

⁹ Swiss Confederation. 2021. [Switzerland's International Cooperation Strategy 2021-2024](#).

Switzerland's Response

On 19 June 2020, the Government decided that Switzerland should sign the Charter on Inclusion of Persons with Disabilities in Humanitarian Action. In accordance with paragraph 1.6 of the Charter, Switzerland supports the implementation of the Sendai Framework on Disaster Risk Reduction and highlights the inclusion of persons with disabilities in disaster risk reduction. [...]

SDDC Analysis

Switzerland has signed the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action, but to date no plan for implementation has been presented. Furthermore, it is unclear to what extent Switzerland's Disaster Risk Reduction (DRR) programmes are inclusive of persons with disabilities and in line with the CRPD. An analysis of Switzerland's allocable Official Development Assistance (ODA) spending using the OECD DRR and disability markers shows that in 2019, 6% of all projects that had DRR as an objective aimed to be disability inclusive.

The implementation of the Charter must have clear and measurable objectives and indicators, including for DRR, and be adequately resourced with personnel and budget. This implementation plan should be guided by the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action.

Our Recommendation

- Implement the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action with clear and measurable objectives and indicators and, in compliance with the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action.

(See [Annex I](#): SDDC Recommendation Number 7)

8. Please provide information on measures taken to ensure:

(b) Inclusion of persons with disabilities in humanitarian action and cooperation, and that all policies and programmes for asylum seekers and refugees are also accessible to asylum seekers and refugees with disabilities, including accessible housing and the provision to learn sign languages.

Switzerland's Response

The 2019 policy paper by the Swiss Agency for Development and Cooperation aimed at "leaving no one behind" highlights disability as a factor of exclusion in its analysis of poverty and exclusion. It details the important aspects of project cycle management that is aimed at leaving no one behind and ensuring inclusion and access to programmes and projects for the most vulnerable groups, including persons with disabilities.

The State Secretariat for Migration is committed to providing assistance for asylum seekers and refugees with disabilities. As part of the country's integration agenda, a competence assessment is carried out for temporarily admitted persons and refugees. The state of health of the person concerned is taken into account in

deciding on the integration plan and the objectives set in it. Within the framework of the cantonal integration programmes for the migrant population, the State Secretariat defines areas of support and strategic objectives. The cantons implement integration measures to achieve these objectives.

SDDC Analysis

In its response, Switzerland solely refers to the SDC guidance note on 'Leave No One Behind'. However, a more concrete plan is required to demonstrate how the signing of the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action will be implemented. These measures need to take place on a policy level and be operationalized on the ground. This should include concrete and measurable objectives and indicators, to ensure the inclusion of persons with disabilities, including for DRR.

Our Recommendation

- Implement the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action with clear and measurable objectives and indicators and in compliance with the IASC guidelines.

(See [Annex I](#): SDDC Recommendation Number 7)

Statistics and data collection (art. 31)

25. Please provide information on:

(b) Mechanisms in place to collect disaggregated data, including in relation to age, sex, disability, ethnic and national origin, migration status, geographic location, place of residence and socioeconomic status;

Switzerland's Response

The Federal Statistics Office is the main body responsible for collecting and disseminating public statistics on the population and households. It has defined a set of characteristics measured in a systematic and standardized way, which is regularly improved and adapted, allowing the statistics to be broken down according to many of the criteria mentioned. Switzerland ensures that many of its surveys are coordinated with those of the European Union or international bodies, particularly with regard to the choice of sociodemographic and socioeconomic variables used and the way in which they are collected and constructed. This is the case for the variables concerning age, sex, migration status, geographic location and place of residence. Disability status is mainly collected through the Minimum European Health Module, which is used in social surveys of persons and households according to the needs and international obligations of each survey. The Global Activity Limitation Indicator developed by Eurostat is thus widely available. Other public bodies collect data on disability, in particular for the purpose of steering social insurance or planning care needs.

SDDC Analysis

Switzerland's response makes no mention of the measures taken on data disaggregation in international cooperation. The SDC guidance on 'Leave No One Behind' highlights the importance of collecting disaggregated data, however, it does not make any clear recommendations or requirements on disability data. It states that context determines the criteria for disaggregation.

The SDC Guidance on results indicators¹⁰ linked to the new Swiss International Cooperation Strategy does not make it mandatory to disaggregate all data by disability. Disaggregation is required for gender and at least one vulnerable/left behind population group. The choice of the latter depends on the context.

All programmes and projects in international cooperation, in all contexts, must collect data on disability and disaggregate along disability in order to track their quality and impact, and to make sure persons with disabilities in general and specific groups of persons with disabilities are not left behind.

We recommend using the human rights indicators of the Office of the United Nations High Commissioner for Human Rights (OHCHR) to design, track and report on the implementation of the CRPD and the 2030 Agenda for Sustainable Development. Furthermore, as a minimum standard, the Washington Group Short Set of Questions and the Washington Group/UNICEF Child functioning model should be used to assess whether persons with disabilities access all services and programmes on an equal basis with others.

Our Recommendation

- Systematically collect and disaggregate data on disability by using as a minimum standard the Washington Group Short Set of Questions and the Washington Group/UNICEF Child functioning model to ensure that persons with disabilities access all services and programmes on an equal basis with others.

(See [Annex I](#): SDDC Recommendation 5)

International cooperation (art. 32)

26. Please provide information on measures to:

(a) Ensure that international development programmes recognize the cross-cutting nature of disability and are inclusive of and accessible to persons with disabilities, including the proportion of international aid budgets allocated to disability-inclusive development;

Switzerland's Response

The new policy of the Swiss Agency for Development and Cooperation on human rights in development and cooperation, adopted in 2019, emphasizes the importance of greater inclusion of persons with disabilities in international cooperation. The Agency pursues a twin-track approach, supporting specific

¹⁰ Swiss Agency for Development and Cooperation. April 2020. [SDC Guidance on Results Indicators](#).

projects and measures for persons with disabilities and helping the institutions and authorities responsible to meet their obligations towards such persons. It takes a multisectoral, cross-cutting and systematic approach in all its strategies, programmes and projects. The Agency became a member of the Global Action on Disability Network in December 2019. In the area of rehabilitation, it supports the Programme for Humanitarian Impact Investment of the International Committee of the Red Cross. Since 2018, the Agency has been funding a pilot project run by CBM in Pakistan and will contribute a total of CHF 30.6 million to the 2021–2024 programme of the CBM-Fairmed disability alliance. Through its contributions to international organizations, Switzerland also participates at multilateral level in strengthening the rights and equality of persons with disabilities. For example, it supports the United Nations Development Programme, which promotes the rights of persons with disabilities and plays a key role in the implementation of the Convention on the Rights of Persons with Disabilities.

SDDC Analysis

Switzerland has certainly taken some steps in the right direction when it comes to persons with disabilities and international cooperation. However, Switzerland's efforts on ensuring that its international cooperation is inclusive need to be framed by an overarching set of guidelines for the inclusion of persons with disabilities in international cooperation. There are currently no disability inclusion guidelines, and no adequate financial and human resources that would allow for a comprehensive approach.

The one and only focal person on disability in the SDC sits within the department on institutional partnerships whose primary task is the promotion of partnerships and SDC's institutional dialogue with Swiss organizations. Given the cross-cutting nature of disability, the focal person, and an associated team on the inclusion of persons with disabilities in international cooperation should sit centrally within the SDC Secretariat - similar to other thematic focal points - to be able to work with and towards all departments, to ensure a transversal approach.

The lack of such a cross-cutting approach becomes evident when new strategies are being published, not considering the rights of persons with disabilities, such as, for example, Switzerland's recently published Digital Foreign Policy Strategy 2021–2024¹¹, which does not touch upon accessibility issues. New technologies offer great opportunities for inclusion and participation, especially for persons with disabilities, but also risks and barriers if equal access to these is not guaranteed.

Furthermore, Switzerland's international cooperation strategy 2021-2024¹² does not effectively and holistically integrate the concept of 'inclusion' and the rights of persons with disabilities as a cross-cutting theme throughout and in line with the CRPD. However, this type of approach is essential to ensure that no one is left behind.

¹¹ Swiss Federal Council. November 2020. [Digital Foreign Policy Strategy 2021–2024 \(German only\)](#).

¹² Swiss Confederation. 2021. [Switzerland's International Cooperation Strategy 2021-2024](#).

With regards to the proportion of international aid budget allocated to disability-inclusive development, Switzerland does not respond to this specifically although first data using the OECD DAC marker on disability have been published. Data was released on Switzerland's 2018 and 2019 development spending using the OECD DAC Policy Marker on Disability. This is indeed a positive step; however, it is only the beginning. The disability marker must be applied systematically from the early phases of project design.

A first analysis of data from 2019 using the disability marker, shows that only 2.1% of Switzerland's allocable ODA financial spending aims to be disability inclusive¹³. All SDC budgets, including funds going to NGOs, the private sector, and multilateral agencies, need to be compliant with the CRPD and uphold the principles of equality, non-discrimination, and participation.

Furthermore, the consistency in the marking of projects using the DAC disability marker must be improved. In 2019, only 13% of all projects from allocable funding were marked using the disability marker. SDC must invest in capacity building for staff members for the proper and quality marking of projects for disability inclusion. According to 2019 data, only 3% of all projects (calculated via total number of projects) aimed to be disability inclusive. There is also inconsistency in the marking of projects between the federal and the cantonal level, suggesting a review needs to take place on whether the criteria for marking the projects are interpreted the same and correctly across the SDC and cantons.

Our Recommendation

- Develop guidelines for the inclusion of persons with disabilities and mainstream their rights across all other strategies in international cooperation, ensuring that a twin-track approach is adopted so that Switzerland's international cooperation efforts reach persons with disabilities both by targeting them and by mainstreaming their concerns.

(See [Annex I](#): SDDC Recommendations 1 and 2)

- Consistently apply the OECD DAC disability marker in all of Switzerland's humanitarian and development projects and ensure staff is trained in its proper application.

(See [Annex I](#): SDDC Recommendation 6)

- Make all budgets compliant with the CRPD, including funds to NGOs, the private sector and multilateral agencies like the UNDP, upholding the principles of equality, non-discrimination and participation.

(See [Annex I](#): SDDC Recommendation 8)

¹³ SDDC. December 2021. [Factsheet: OECD DAC Disability Policy Marker and its application in Switzerland's ODA reporting](#)

26. Please provide information on measures to:

(b) Mainstream the rights of women and girls with disabilities into the 2017 Strategy on Gender Equality and Women's Rights of the Federal Department of Foreign Affairs;

Switzerland's Response

The gender equality and women's rights strategy of the Federal Department of Foreign Affairs is based on, inter alia, the Convention on the Elimination of All Forms of Discrimination against Women. Combatting discrimination is thus one of the main objectives of the strategy. The Department is committed to promoting the economic empowerment and real participation of women, combatting all forms of gender-based violence and upholding sexual and reproductive health rights. The strategy is currently being monitored in view of its possible adaptation, including in the area of multiple and intersectional discrimination.

SDDC Analysis

The 2017 Strategy on Gender Equality and Women's Rights neither entails the rights and inclusion of women and girls with disabilities nor addresses any intersectional discrimination. The strategy was supposed to be reviewed in a participatory process, however, to our understanding no steps have been undertaken so far.

Furthermore, the new International Cooperation Strategy 2021-2024 lacks an intersectional approach regarding women's rights while defining the term inclusion in very restricted terms applying to women only and not including women with disabilities specifically and persons with disabilities more generally.

Our Recommendations

- Develop guidelines for the inclusion of persons with disabilities, including women and girls with disabilities, and mainstream their rights across all strategies, policies and programming in international cooperation, adopting a twin-track approach ensuring that Switzerland's international cooperation efforts reach persons, and especially women and girls with disabilities both by mainstreaming their concerns and by targeting them.

(See [Annex I](#): SDDC Recommendations 1 and 2)

26. Please provide information on measures to:

(c) Closely consult and actively involve organizations of persons with disabilities in the design and implementation of international cooperation initiatives, including in developing the strategy for the dispatch on international cooperation by Switzerland for the period 2021–2024;

Switzerland's Response

The Swiss Agency for Development and Cooperation works closely with the Swiss Coalition for the Rights of Persons with Disabilities in International Development Cooperation (CBM Switzerland, Handicap International, Fairmed and the

International Disability Alliance) and will formalize this work through an agreement. The concept is currently being developed in collaboration with CBM.

SDDC Analysis

The SDDC very much welcomes the close collaboration with the SDC. However, more must be done to directly consult persons with disabilities and their representative organizations in and outside of Switzerland in the countries where SDC is active or is planning and implementing projects, programmes, strategies or policies. The SDDC is a consortium working for persons with disabilities but is not a consortium of persons with disabilities.

The agreement mentioned in Switzerland's response seems to refer to a mandate between CBM and SDC consisting of capacity-building measures for SDC staff. This also includes a project to strengthen the quality and accountability of Swiss development cooperation and humanitarian aid, including recipient agencies, to meet their obligations in line with the CRPD, by strengthening the capacities of Swiss organizations of persons with disabilities as well as supporting stronger cooperation and solidarity between disability movements in the Global North and South.

Regarding the consultation and involvement of OPDs in the development of strategies; official public consultations, such as for the development of the international cooperation strategy 2021-2024, are not enough. Switzerland should engage diverse OPDs directly (via focus group discussions or other), even before the start of the drafting of its strategies and policies in the field of international cooperation, including for the upcoming drafting of the next international cooperation strategy 2025-2028.

Our Recommendation

- Meaningfully consult with persons with disabilities and their representative organizations both in Switzerland and abroad, and actively involve them throughout all strategy, policy and programme processes regarding Switzerland's international cooperation as well as the implementation of the 2030 Agenda for Sustainable Development, including by their inclusion in the SDG advisory group.
- Ensure that the implementation of the 2030 Agenda for Sustainable Development in and by Switzerland respects and promotes the rights of persons with disabilities as a cross-cutting issue.

(See [Annex I](#): SDDC Recommendation Number 3 and 4)

26. Please provide information on measures to:

(d) Endorse the Charter on Inclusion of Persons with Disabilities in Humanitarian Action.

Switzerland's Response

On 19 June 2020, the Government decided that Switzerland should sign the Charter on Inclusion of Persons with Disabilities in Humanitarian Action.

SDDC Analysis

The SDDC very much welcomes Switzerland's signing of the Charter. However, so far, no implementation plan has been presented. The implementation of the Charter must have clear and measurable objectives and indicators, including for DRR, and be adequately resourced with personnel and budget. This implementation plan should be guided by the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action.

Our Recommendation

- Implement the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action with clear and measurable objectives and indicators, and in compliance with the IASC guidelines.

(See [Annex I](#): SDDC Recommendation Number 7)

Detailed recommendations of the Swiss Disability and Development Consortium for Switzerland's implementation of the CRPD regarding international cooperation and humanitarian action

Develop guidelines for the inclusion of persons with disabilities and mainstream their rights across all other strategies in international cooperation

1. Develop guidelines for the inclusion of persons with disabilities in Switzerland's international development and humanitarian action by June 2022. This should include DRR and consider the disproportionate consequences of COVID-19 on persons with disabilities. The guidelines should translate into a plan of action with measurable and tangible targets and be mainstreamed across all other strategies in Switzerland's international cooperation. The guidelines must also be adequately resourced with personnel and budget, be regularly monitored and reported on in SDC's annual reports and effectiveness reports and should be both internal and external facing. A twin-track approach must be adopted to ensure that Switzerland's international cooperation efforts reach persons with disabilities both by targeting them and by mainstreaming their concerns. Special focus should be placed on those persons with disabilities that are most marginalized and underrepresented, including but not limited to: women, girls, boys, men, gender non-conforming persons, youth, elderly, LGBTIQ+, refugees, internally displaced, indigenous, persons with psychosocial disabilities, intellectual disabilities and deaf blindness.

2. Ensure that in line with the CRPD, the rights of persons with disabilities are mainstreamed into all newly developed or revised strategies of the Federal Department of Foreign Affairs on international cooperation and humanitarian aid.

Consult and actively involve persons with disabilities

3. Meaningfully consult with persons with disabilities and their representative organizations and actively involve them throughout all strategy, policy and programme processes (including planning, implementation, monitoring and evaluation) regarding Switzerland's international cooperation as well as the 2030 Agenda for Sustainable Development (i.e. participation in the Agenda 2030 advisory group). This is to ensure their effective participation in decisions affecting them, in line with Art. 4.3 CRPD and General Comment No. 7. Provide capacity-building, funding and reasonable accommodation to organizations of persons with disabilities so that they can meaningfully participate in such consultations (General Comment No. 7). Whenever consulting OPDs, ensure that they are being paid for their time and expertise.

¹⁴ For more information on the SDDC's work and recommendations, please visit www.leave-no-one-behind.ch

Ensure a disability-inclusive implementation of the 2030 Agenda

4. Ensure that the implementation of the 2030 Agenda for Sustainable Development in and by Switzerland respects and promotes the rights of persons with disabilities, through the Swiss Sustainable Development Strategy 2020-2030 as well as its quadrennial action plans. The "Leave No One Behind" principle should be prioritized while considering the disproportionate consequences of COVID-19 on persons with disabilities.

Collect and disaggregate data on disability

5. Systematically collect and disaggregate data on disability, including for all COVID-19 relief, protection and recovery measures, by using as a minimum standard the Washington Group Short Set of Questions and the Washington Group/UNICEF Child functioning model to ensure that persons with disabilities access all services and programmes on an equal basis with others. This must include the collection of data on the situation of persons with disabilities living in institutions. At the same time, we recommend using the human rights indicators of the Office of the United Nations High Commissioner for Human Rights (OHCHR) to track and report on the implementation of the CRPD and the 2030 Agenda for Sustainable Development, as well as the COVID-19 response.

6. Consistently apply the OECD DAC disability marker in all of Switzerland's humanitarian and development projects and ensure staff is trained in its proper application. To allow for the measuring of the impact of projects marked as targeting disability, Switzerland should include in their project monitoring frameworks appropriate indicators to monitor the results of disability inclusion.

Implement the Charter on the Inclusion of Persons with Disabilities in Humanitarian Action

7. Fully implement the Charter as well as the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action and therefore render Swiss humanitarian action inclusive of persons with disabilities by lifting barriers persons with disabilities face in accessing information, relief, protection and recovery support, such as during the COVID-19 crisis.

Make all budgets compliant with the CRPD

8. Provide for CRPD compliant budgeting by applying the twin-track approach to the inclusion of persons with disabilities. This includes but is not restricted to reserving funds for reasonable accommodation (at least 2% of each budget) to enable participation of persons with disabilities to access mainstream development and humanitarian programmes; as well as specific programmes that are addressing systemic historical discrimination faced by persons with disabilities. Funds to NGOs, the private sector and multilateral agencies must as well be in line with the CRPD, upholding the principles of equality, non-discrimination and participation. Consequently, current financial support to programmes or partners not in line with the CRPD need to be either re-aligned with the CRPD or to be stopped.