



Swiss Disability and Development  
Consortium (SDDC)  
CBM Switzerland (Secretariat)  
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Ms. Director Patricia Danzi  
Ms. Christine Schneeberger  
Ms. Stephanie Guha  
Swiss Agency for Development  
and Cooperation (SDC)  
Freiburgstrasse 130  
3003 Bern

15 June 2023

### **SDC's position on the Roadmap 2023-2024 for the inclusion of persons with disabilities in Swiss international cooperation**

Dear Ms. Director Danzi,  
Dear Ms. Schneeberger,  
Dear Ms. Guha,

The Swiss Disability and Development Consortium (SDDC) is pleased that the Swiss Agency for Development and Cooperation (SDC) approved our Roadmap 2023-2024 for a more disability-inclusive Swiss international cooperation and considers most of the recommendations to be implementable.

While welcoming SDC's positive response, we would like to draw your attention to the following critical points:

- **Structural embedding:** We would like to reiterate the importance of dedicating within SDC significant personal resources with expertise in disability-inclusive development (DiD). Embedding DiD within the portfolio of the Policy Advisor on Social Equality is a very positive development but as mentioned in your own analysis, the position is missing both enough resources and expertise. Hiring persons with disabilities as part of the SDC, not exclusively but also within the thematic department Peace, Governance and Equality, is key in achieving DiD and we therefore urge the SDC and the relevant federal authorities such as the Directorate for Resources, the federal personnel office as well as the FDFA Equal Opportunities Section to take the appropriate measures.



- **Externally mandated evaluation:** We strongly welcome evaluating the Moldavian country office and programs and showcasing their experience in DiD. In our opinion, it will be important to make sure these learnings are shared with and implemented in other countries and regions. The Policy Advisor on Social Equality will play a critical role in this.
- **DiD Guidelines:** We regret that SDC considers DID Guidelines as not purposeful and effective. Also the Committee on the Rights of Persons with Disabilities recommends the SDC to “adopt guidelines to ensure that all international cooperation programs are disability-inclusive and harmonized with the Convention, and do not result in the segregation of persons with disabilities” (Concluding Observation 62a, 2022). Such guidelines would provide a vision and strategic direction for SDC around disability inclusion, help establish accountability and buy-in from the organization and staff. At a broader level, it would ensure a holistic approach to disability inclusion at both institutional and field level that is still missing. Other donor countries such as the United Kingdom and Australia are leading the way with their DiD strategies. We would also like to highlight the importance of mainstreaming disability-inclusion into all other strategies and sector specific guidelines including the upcoming International Cooperation Strategy 2025-2028, the new Foreign Policy Strategy, the FDFA Strategy on Gender Equality and Women’s rights to name only a few.  
As to the Action Plan to implement the Charter for the inclusion of Persons with disabilities in humanitarian Action, we regret that no internal coordination and discussion seems to have taken place with the competence center humanitarian aid. Given the Humanitarian-Development Nexus approach and SDC’s reorganization to take this into account, we strongly encourage internal discussions on how to move inclusive humanitarian action forward and ensure alignment between humanitarian aid and development. Only by doing so, disability inclusion can be achieved in a sustainable and comprehensive manner.
- **Partnership and collaboration with OPDs:** We strongly welcome that the SDC supports the participation of Organizations of Persons with Disabilities (OPDs). Meaningful participation and consultation need to happen in every phase of the project cycle management as well as in the development and monitoring of strategies and guidelines at country and Swiss level such as the strategies mentioned above. We would also like to remind the SDC that for meaningful participation, accessibility, reasonable accommodation, capacity-building and funding to OPDs are key.
- **Data disaggregation and spending on disability inclusion:** Only by collecting and disaggregating data on disability and identifying the barriers persons with disabilities face, the SDC can track whether persons with



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disabilities are included and not left behind. It is therefore critical, that collecting and disaggregating data on disability becomes mandatory such as the collection and disaggregation on gender. This is also a recommendation by the Committee on the Rights of Persons with Disabilities (Concluding Observation 60c, 2022). Further, the new digital Results Data Management System should allow entering multiple disaggregation criteria within one project to ensure intersectional discrimination is duly considered. To disaggregate along disability, we strongly recommend using as a minimum standard the Washington Group Short Set of Questions and the Washington Group/UNICEF Child functioning model. 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 for the OECD DAC Disability Marker, we welcome that the SDC now screens 100% of its projects. However, it is critical to ensure quality marking of projects. For this to happen, training on the OECD DAC Disability Marker has to be regularly provided. This is also reflected in the Concluding Observation 62c by the Committee on the Rights of Persons with Disabilities and could happen within action 3 "capacity-building on DiD" that the SDC considers as feasible.

We thank you for taking our considerations into account when implementing the Roadmap 2023-2024 and stand ready to advise the SDC in this regard. We look forward to our continuing collaboration.

In the name of the Consortium, sincerely,

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