



## Disability Equity & Rights Policy

Policy & Procedure Owner	CEO Office	
Approved by	ERF Board of Directors	
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### Abbreviations

ACFID	Australian Council for International Development
AIDS	Acquired Immune Deficiency Syndrome
CEO	Chief Executive Officer
CRPD	United Nations Convention on the Rights of Persons with Disability
ERF	Edmund Rice Foundation
GEDSI	Gender Equality, disability and social inclusion
OPDs	Organisations of persons with disabilities
UDHR	Universal Declaration of Human Rights

### Definitions

ACFID Member	A not-for-profit organisation that has obtained accreditation with ACFID
Board Members	Voluntary directors of ERF's Board of Directors
Donor	Any individual, group, organisation, or institution that provides financial or in-kind contributions to ERF
Partner	Any organisation which has an MOU or contract with ERF
Primary Stakeholder (beneficiary)	Children and adults who participate in and are directly impacted by ERF partner projects
Program	Programs are overarching development approaches and initiatives that set priorities and guide project outcomes, results and activities. Programs can comprise ministries or entities
Project	Projects are the development activities of a Program
Representatives	Collectively refers to all Staff, Board Members, Volunteers, and Third Parties (as separately defined) who act for, on behalf of, or under the authority of ERF
Staff	Individuals formally engaged by ERF on a paid basis who work under ERF's direct supervision and are subject to its policies and procedures, including without limitation employees, apprentices, trainees, work experience students
Stakeholder	Any individual, group or organisation that has an interest in, is affected by, or has the ability to influence ERF's operations, Programs or Partnerships. This includes, but is not limited to, ERF Staff, contractors, volunteers, Board Members, implementing Partners, suppliers, Program beneficiaries, and relevant governmental or international actors
Third Parties	Individuals or entities who perform work for, or have access to, ERF funds, resources, or Programs but are not formally employed by ERF, including without limitation contractors, subcontractors, outworkers, consultants, suppliers, implementing Partners and any other person or entity entrusted with ERF funds or assets

Volunteers	Individuals who freely offer their time and services to ERF on an unpaid and voluntary basis, who work under ERF's direct supervision and are subject to its policies and procedures
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## **1.0 Policy statement**

ERF is committed to advancing disability equity and rights in all areas of its work. We recognise disability as a human rights issue and are guided by the principle that persons with disabilities have the right to participate fully and equally in society, including social, economic and political life, free from discrimination, exclusion and harm.

ERF takes a rights-based, inclusive development approach that identifies and removes barriers to participation, promotes access and reasonable accommodation, supports meaningful consultation with persons with disabilities, and responds to intersecting forms of disadvantage. ERF also seeks to strengthen the participation and leadership of persons with disabilities in our operations, partnerships and programs.

ERF expects all Representatives and Partners to uphold the principles and commitments in this Policy and to actively contribute to creating an organisation and programs that are accessible, equitable, respectful and inclusive of persons with disabilities.

## **2.0 Purpose**

The purpose of this Policy is to set out ERF's commitments to disability equity and rights and to guide how these commitments are applied across ERF's operations, partnerships and programs.

ERF recognises that disability is a human rights issue and that inclusive development requires the meaningful participation of persons with disabilities. ERF also recognises that disability may intersect with other forms of disadvantage, including gender, race and socio-economic status, and that women and girls with disabilities may face heightened risks of discrimination, abuse and violence. ERF is committed to addressing these intersecting barriers through its organisational practice, programming and partner engagement.

## **3.0 Commitments**

To give effect to this Policy, ERF Representatives and overseas partner Program Staff will:

- promote the rights, dignity, participation and inclusion of persons with disabilities in accordance with the UN Convention of the Rights of Persons with Disabilities (CRPD) and Universal Declaration of Human Rights (UDHR);
- adopt and apply a rights-based approach to disability equity;
- support persons with disabilities to realise their rights and influence decision-making, recognising that people with intersecting characteristics may experience heightened barriers;
- ensure reasonable accommodation, accessible participation, and equitable access to, control over, and benefit from resources, services and opportunities;
- integrate disability equity into project identification, design, implementation, monitoring and evaluation;
- strengthen the participation and leadership of persons with disabilities and organisations of persons with disabilities (OPDs);
- require processes and systems that help protect persons with disabilities from unintended harm;
- provide disability equity and rights training for all project personnel; and
- ensure language and imagery are culturally sensitive and promote dignity and inclusion.

## **4.0 Scope**

ERF is committed to embedding and promoting disability equity and rights within the organisation, through our policies, strategy, operations and programming. As such, this Policy applies to:

- all Representatives and Board members of ERF;
- all operations and Programs, both in Australia and overseas; and
- all Partner organisations and Partner Staff.

Where necessary, this Policy makes a distinction between internal processes that concern ERF Staff and external processes that concern ERF's implementing Partners.

## **5.0 Definitions**

The following definitions apply throughout this Policy:

### **5.1 Disability**

For the purposes of this Policy, disability includes any physical, mental, intellectual, sensory, neurological or psychiatric impairment, whether the disability presently exists, previously existed, or may exist in the future. This includes conditions that limit a person's ability to participate fully and equally in society. This definition is consistent with both the CRPD and the *Disability Discrimination Act 1992* (Cth).

### **5.2 Disability-inclusive development**

Disability-inclusive development promotes effective development by recognising that, like all members of a population, persons with disabilities are both beneficiaries and agents of development. An inclusive approach seeks to identify and address the barriers that prevent persons with disabilities from participating in and benefiting from development. The inclusion of persons with disabilities as active participants in development processes leads to broader benefits for families and communities, reduces the impacts of poverty, and positively contributes to a country's economic growth.

### **5.3 Disability-specific support**

Disability-specific support involves targeted interventions and reasonable accommodations provided to individual persons with disabilities to ensure they can actively participate in, and equally benefit from, Program activities. Disability-specific support complements mainstreaming by addressing barriers that universal approaches alone cannot remove.

### **5.4 Intersectionality**

Intersectionality refers to the ways in which aspects of a person's identity, including gender, disability, race, ethnicity, indigeneity, age, socioeconomic status, sexual orientation, displacement, religion, and health status, intersect and compound one another to produce distinct overlapping experiences of marginalisation and exclusion that cannot be understood or addressed by examining any single factor alone.

### **5.5 Mainstreaming**

Mainstreaming involves integrating disability inclusion into the objectives and activities of a Program (e.g. by taking action to identify and remove barriers and making Program activities as accessible as possible). Mainstreaming does not include the provision of disability-specific support or targeted interventions for individual persons with disabilities.

### **5.6 Reasonable accommodation**

Reasonable accommodation means making necessary and appropriate modifications and adjustments, not imposing a disproportionate or undue burden, when needed in a specific situation so that persons with disabilities can enjoy or exercise all human rights and freedoms equally with others.

### **5.7 Social model of disability**

The social model of disability holds that people are disabled by barriers in society, rather than by their impairments. These barriers may be attitudinal, environmental, institutional or communication-related (for example, the absence of an access ramp or accessible toilets would be recognised as environmental barriers). The social model recognises barriers that persons with disabilities experience, and how removing these barriers creates equality and offers more independence, choice

and control. The social model was developed by persons with disabilities in response to the medical model, where a PWD is seen as having health condition and in need of being fixed or cured.

### **5.8 Twin Track approach**

The 'Twin Track approach' to disability inclusion involves a combination of mainstreaming (5.5) and Disability-specific Support (5.3) to ensure persons with disabilities can actively participate in and equally benefit from Program activities. The two tracks are complementary and mutually reinforcing, with mainstreaming creating an inclusive environment for all, while disability-specific support ensures individual needs are met where universal approaches are insufficient.

## **6.0 Guiding principles and strategy**

Further guiding principles of the Disability Equity & Rights Policy include:

- all people have the right to equal and meaningful participation;
- disability rights are human rights;
- persons with disabilities are valued members of every community;
- recognising that disability is understood differently across cultures, including among First Nations Australians and Indigenous peoples internationally, where community participation and collective wellbeing are often centred over individual impairment. ERF's approach to disability equity is therefore contextual and community-centred across all countries of operation, drawing on local and Indigenous knowledge;
- inclusive development requires primary stakeholders, specifically those a part of marginalised groups, to take an active role in consultation and decision making;
- recognising and actively addressing intersecting drivers of marginalisation and exclusion, including but not limited to socio-economic status, poverty, class, age, race, ethnicity, indigeneity, displacement, caste, gender, gender identity, sexuality, sexual orientation, marital status, physical and intellectual ability, disability, political affiliation, religious affiliation and other characteristics of uniqueness;
- embedding of the social model of disability via mandatory disability equity training;
- a 'do no harm' approach; and
- 'nothing without us', a call from the disability rights movement for the participation and contribution of persons with disabilities to be listened to, to participate and to contribute at all stages of policy and program development across all sectors.

### **6.1 International Conventions and Legislation**

ERF's Disability Equity & Rights Policy adheres to the following international conventions and legislation:

- *The Universal Declaration of Human Rights* (UDHR);
- *United Nations Convention on the Rights of Persons with Disabilities* (CRPD);
- Australia's International Disability Equity and Rights Strategy (IDEARS, 2024);
- *United Nations Sustainable Development Goals* (SDGs); and
- Domestic disability legislation and regulatory frameworks applicable in each country of operation, as updated from time to time.

### **6.2 Australian Policy and Legislation**

ERF's Disability Equity & Rights Policy adheres to the following Australian strategy, policy and legislation:

- Department of Foreign Affairs and Trade (2024), *Australia's International Disability Equity and Rights Strategy*, Commonwealth of Australia, Canberra;
- *ACFID Code of Conduct* (2023);
- *Disability Discrimination Act 1992* (Cth);
- *Australian Human Rights Commission Act 1986* (Cth); and
- *Fair Work Act 2009* (Cth).

## **7.0 Policy in practice**

### **7.1 Application in operations**

Within the organisation, ERF commits to:

- having a disability equity and rights focal point who is nominated by the CEO and whose responsibilities are set out in this Policy below in section 9.4;
- ensuring dedicated members of Staff reviews all policies and procedures against disability equity principles as part of the policy review cycle and as required in response to updates in sector standards or applicable legislation;
- developing Representative capacity to work in a disability sensitive and equitable manner via the provision of mandatory disability equity training, recorded in ERF's training register;
- having dedicated members of Staff assess the organisation's disability capacity as part of its effectiveness framework and development effectiveness framework [annually], with findings reported to the CEO and Board;
- ensuring that equal opportunity exists in all areas of employment and recruitment, consistent with the Disability Discrimination Act 1992 (Cth) and ERF's Human Resources Policy;
- providing any reasonable accommodations necessary to employ and/or engage with persons with disabilities, with requests made to the CEO and assessed on a case-by-case basis in accordance with ERF's Human Resources Policy;
- the provision of employment conditions and opportunities for professional development without discrimination, consistent with the Fair Work Act 2009 (Cth), Disability Discrimination Act 1992 (Cth), and ERF's Human Resources Policy, with the CEO responsible for ensuring professional development is equitably accessible to all Staff;
- the provision of a working environment free from discrimination, bullying, sexual harassment, and racial and religious vilification, upheld through ERF's Code of Conduct, Workplace Health and Safety Policy, and Complaints Handling Policy, with all Representatives required to report conduct inconsistent with this commitment through ERF's complaints handling procedures;
- the provision of reasonable flexibility in working arrangements to accommodate for employees' family and carer responsibilities, disability, religion and culture and work/life balance, with requests considered by the CEO in accordance with the Fair Work Act 2009 (Cth) and ERF's Human Resources Policy;
- the participation of people who have lived experience of disabilities to engage with the Board of Directors;
- accessible communication materials to the extent possible;
- capacity development of Board Members and Staff to deliver inclusive development through training, professional development and other avenues (recorded in ERF's training register); and
- monitoring and evaluating ERF's disability equity practice regularly against the commitments in this Policy, with reports made to the CEO and Board as part of ERF's compliance reporting, and corrective actions documented.

### **7.2 Application in programming**

ERF requires prospective Partners to demonstrate how their proposed Project contributes to disability equity and inclusion through the submission of formal tools and applications. Disability analysis is not limited to the design stage; it is required at every stage of the Project cycle, from initial application through to monitoring, evaluation and reporting. These tools and applications include:

- the International Project Application Form;
- the Project Risk Management Framework; and
- the vulnerability and disability analysis process described in ERF's GEDSI Framework.

Partners are required to demonstrate how persons with disabilities have been engaged in the Project design and delivery, and identify the number of persons with disabilities participants.

If the disability lens of a Project is deemed insufficient, ERF will engage in a process of mutual consultation with the Partner to build the capacity of disability equity activities.

### **7.3 International Project Application Form**

Prospective ERF Partners are required to address their policies towards disability equity and rights in the ERF International Partnership and Funding Application. The applicant must:

- explain how they are addressing disability equity;
- identify how the Project scores (Principal, Significant, Not targeted) on the Organisation for Economic Co-operation and Development ([OECD Development Assistance Committee \(DAC\) disability inclusion policy marker](#));
- if the Project is rated as 'Significant' to identify specific indicators (qualitative and quantitative) in the Project's logical framework ('logframe') to support ongoing monitoring and evaluation;
- identify if the Project is applying a Twin Track or Mainstreaming approach (where applicable);
- forecast the number of beneficiaries they intend to reach with their Project, separated by demographic categories including disability and age;
- explain how persons with disabilities and OPDs were directly consulted in the design, implementation, monitoring and evaluation of the project;
- explain what reasonable accommodations will be implemented if the Project has direct participants with a disability;
- ensure Project processes are designed to prevent marginalised and excluded participants, including persons with disabilities, from experiencing unintended harm;
- provide a copy of their Project's Disability Equity Policy or statement; and
- provide evidence of training sessions in disability equity and inclusion extended to staff.

For Projects that do not have disability equity as their core purpose, ERF encourages Partners to conduct additional, separate consultation sessions with persons with disabilities. ERF believes that dedicated consultation sessions with persons with disabilities are more likely to reveal unique disability-specific needs and priorities.

ERF will work to build the capacity of Partners whose Project design is considered inadequate in advancing disability equity. Inadequate Project design may be identified through a Partner's formal application submission and related tools, including the International Project Application, the Project Risk Management Framework and the GEDSI framework. Inadequacies may also be identified through informal discussion between ERF and Project Partners.

### **7.4 Project Risk Management Framework**

The Project Risk Management Framework is a tool administered by Partners to establish procedures for risk prevention, and in cases where risks cannot be reasonably prevented, effective risk mitigation. To be eligible for funding, Partners must have a Risk Management Framework (RMF) in place that they review on a regular basis. In addition to an overarching Program RMF, a Partner should maintain a specific RMF for each of its Projects. One of the risk categories Partners are required to report on is cross-cutting policies, which include disability equity and rights.

### **7.5 GEDSI Framework**

ERF's commitment to disability equity is a core dimension of ERF's Gender Equality, Disability and Social Inclusion ('GEDSI') framework, an intersectional approach that recognises gender equality, disability equity, and social inclusion as interconnected and mutually reinforcing dimensions of rights-based development. ERF's GEDSI framework is not a standalone operational instrument; it is a transparency and accountability document that makes visible how ERF incorporates GEDSI analysis into its funding application, partner assessment, and vulnerability analysis processes.

ERF's GEDSI framework documents and makes transparent this embedded approach, providing a coherent, publicly accessible account of how disability equity analysis is applied across the application, vulnerability assessment, monitoring, and evaluation processes.

## **8.0 Project monitoring and evaluation**

### **8.1 Quarterly acquittal forms**

With each quarterly acquittal submission, Partners are required to indicate whether Staff training in cross-cutting policies was delivered. This includes training in disability equity and rights by appropriately qualified Staff. Partners are required to share their training materials with ERF to ensure that the training reflects the current research of sustainable development and to identify and address any cultural biases in content.

### **8.2 Project evaluation forms**

Partners are required to submit acquittal forms throughout the funding cycle (annual acquittal, mid-term acquittal, and end-term acquittal as applicable) to account for the outcomes of their Project.

ERF asks Partners to respond to the following questions at the mid- and end-term project acquittals:

- Did you implement a disability equity strategy/lens to your work?
- What percentage of Project participants identified as persons with disabilities? (This is auto calculated from participant numbers)
- What actions did you take to actively incorporate disability equity at a Project level and within the organisation?
- Have there been any challenges or unexpected barriers (specific to disability equity) throughout the Project? If yes, how did you address these?
- Upon reflection, what strategies could have been used to ensure greater participation of persons with disabilities in your Project?
- Requiring Partners to evidence how persons with disabilities and OPDs have meaningfully participated in monitoring and evaluation.

These questions are in addition to Partners reporting against their logframes, which contain specific indicators and outcomes related to disability equity (dependent on the type of Project).

ERF also requires Partners to indicate the number of their Staff separated by categories of gender and disability.

## **9.0 Roles and Responsibilities**

### **9.1 Board of Directors**

The Board of Directors are responsible for:

- Ultimate accountability for this Policy;
- approving this Policy and holding the CEO accountable to how effective this Policy is implemented; and
- actively articulating and championing ERF's commitment to disability equity and rights, ensuring this commitment is embedded in organisational values, reflected in strategic priorities, and modelled in governance practice.

### **9.2 CEO**

The CEO is responsible for:

- ensuring this Policy is upheld;
- integrating disability equity considerations into all organisational decision-making processes;
- overseeing the development and delivery of training and ongoing disability equity capacity building for Staff at all levels;

- actively articulating and championing disability equity in internal and external communications;
- ensuring reasonable adjustments processes are in place and functioning across all offices;
- ensuring all Staff and Stakeholders are aware of and understand their respective roles and responsibilities in advancing ERF's disability equity and rights commitments; and
- informing the Board of any concerns relating to the commitments and principles outlined in this policy

### **9.3 ERF Staff**

ERF Staff are responsible for:

- Reading, understanding and complying with this Policy and related procedures;
- completing mandatory disability equity training and induction requirements;
- applying disability equity principles in all aspects of their work including but not limited to Program design, implementation and Stakeholder engagement; and
- ensuring that their actions are in line and reflect the guiding principles and Policy commitments above.

### **9.4 Nominated focal point**

ERF designates a nominated Disability Equity and Rights Focal Point (Nominated Focal Point) at the organisational level. The Focal Point reports to the CEO and serves as the primary internal contact for disability equity matters across ERF's operations and Programs. The nominated disability equity focal point is responsible for:

- serving as the primary contact for disability equity concerns, queries, and complaints from Board Members, Representatives, Partners and Stakeholders;
- ensuring that ERF policy and processes are updated to reflect best practice and changes in the sector;
- Provide training to ERF Staff, Board Members, Partners and others as required; and
- Conducting periodic assessment of ERF's approach and implementation of disability equity in ERF's operations and programming.

## **10.0 Related ERF policies and documents**

ERF policies and processes are regularly updated. For the most up to date policies, refer to ERF's website available at [www.erf.org.au/policies](http://www.erf.org.au/policies).

### **10.1 Related policies**

- Complaints Handling Policy
- Gender Equality & Female Empowerment Policy
- Human Resource Policy
- Occupational Health & Safety Policy
- Project Design, Funding & Management Policy
- Staff Code of Conduct
- Travel & Immersion Policy & Framework

### **10.2 Related documents**

- International Project Partnership and Funding Application Form
- Project Risk Management Framework
- GEDSI Framework