

Disability Inclusion Guide for Financial Services Providers (FSPs)

ANNEX 1: Integrating Disability Inclusion in Social Performance Management Frameworks



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ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
ADHD	Attention-deficit/hyperactivity disorder
AI	Artificial intelligence
ATM	Automated teller machine
CEO	Chief Executive Officer
CFI	Center for Financial Inclusion at Accion
DEI	Diversity, equity, and inclusion
EAA	European Accessibility Act (2019)
EU	European Union
FSP	Financial services provider
GBV	Gender-based violence
GEDSI	Gender equality, disability, and social inclusion
HIV/AIDS	Human immunodeficiency virus / Acquired immunodeficiency syndrome
HR	Human resources
ICT	Information and communications technology
ILO	International Labour Organization
ISO	International Standards Organization
IT	Information technology
IVR	Interactive voice response
MFI	Microfinance institution
MIS	Management information system
NGO	Non-governmental organization
OPD	Organization of persons with disabilities
PEEP	Personal emergency evacuation plan
PIN	Personal identification number
SDGs	Sustainable Development Goals
SMART	Specific, measurable, attainable, relevant, and time-bound
SMS	Short message service
ToT	Training of trainers
TRS	Text-based relay services

Acronym	Meaning
UK	United Kingdom of Great Britain and Northern Ireland
UN	United Nations
UNCRPD	UN Convention on the Rights of Persons with Disabilities
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund
UNICEF	United Nations Children's Fund
USA	United States of America
USSEPM	Universal Standards for Social and Environmental Performance Management
VRS	Video relay services
W3C	World Wide Web Consortium
WCAG	Web Content Accessibility Guidelines
WGSS	Washington Group Short Set on Functioning
WHS	Workplace health and safety

ANNEX 1: INTEGRATING DISABILITY INCLUSION IN SOCIAL PERFORMANCE MANAGEMENT FRAMEWORKS

5.1 Introduction

Cerise+SPTF and the Barrier-Free Finance Initiative (BFFI) have collaborated to develop guidelines and resources for FSPs to promote the inclusion of persons with disabilities in financial services.

1. The '**Disability Inclusion Guide for FSPs**' produced by BFFI (**this guide**) is aimed at supporting FSPs to design, implement and monitor disability inclusion strategies across their operations, with practical examples and step-by-step guidance. It can be used by:
 - **all FSPs** seeking to advance disability inclusion within their organization, as a stand-alone guide and reference manual.
 - **FSPs using Cerise+SPTF's 'SEPM Guide – Disability Inclusion Focus'** to integrate disability inclusion within their social performance management systems, as a complementary resource.
2. The '**SEPM Guide – Disability Inclusion Focus**' produced by Cerise+SPTF is designed to support FSPs to understand where and how disability inclusion can be integrated within the framework of [Cerise+SPTF's Universal Standards](#) and [tools and resources](#) for Social and Environmental Performance Management (SEPM). It can be used by:
 - organizations already familiar with the Universal Standards
 - organizations that use or plan to use SPI Online assessment tools and resources

The '**SEPM Guide – Disability Inclusion Focus**' includes **a suite of disability inclusion indicators** aligned to the dimensions, standards and essential practices of Universal Standards. These are designed to support FSPs to assess their disability inclusion practices as part of their ongoing social performance assessment, improvement, reporting and learning process.

The majority of these disability inclusion indicators are incorporated within the '**SPI5 Entry**' tool, with a small number of additional indicators included in the '**SPI5 Full**' tool.

5.2 Disability inclusion indicators within the USSEPM

The **disability inclusion indicators** included in the '**SEPM Guide – Disability Inclusion Focus**' are listed below with **references to relevant sections in this guide**, where users can find more detailed information and guidance to support their assessment, and help them to develop action plans for improvement.

5.2.1 Disability inclusion indicators: SPI5 Entry

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 1. Social Strategy	
Standard 1A. The provider has a strategy to achieve its social goals	
Essential Practice 1.A.1 The strategy specifies the provider's target clients, social goals, and how the provider will achieve those goals	
1.A.1.1 Social strategy and goals specifically mention equitable inclusion of persons with disabilities, either as target clients, or as a subset within its target client groups	Strategy & goals
1.A.1.2 The strategy identifies the benefits that the provider seeks to create for clients with disabilities, and describes how the provider's products and services create positive change for clients, aligned to its social goals.	Strategy & goals
1.A.1.4 The provider defines a “do no harm” strategy that articulates how it will mitigate the social risks associated with the exclusion of persons with disabilities, and heightened risks experienced by persons with disabilities connected to the use of financial products and services.	Transparency, fair treatment & safeguarding
Essential Practice 1.A.2 The strategy defines indicators and targets to measure the provider's progress toward social goals.	
1.A.2.1 The provider has at least one measurable indicator on disability inclusion and at least one measurable output and/or outcome target for its disability inclusion goals.	Strategy & goals
Standard 1B. The provider collects, analyzes, and reports data that are specific to its social goals.	
Essential practice 1.B.1 The provider collects data on outcomes for clients and their households.	
1.B.1.1 Social performance data collection modalities are accessible and enable fair representation and participation of persons with different types of impairments.	Data & MIS
1.B.1.2 Employees in relevant positions receive specific training on social performance data collection and entry, including accessibility and inclusion, inclusive data collection, and inclusive interaction and communication with persons with disabilities.	Staff engagement, awareness & training
1.B.1.3 The provider collects data on an ongoing basis to measure whether it is achieving its social goals, including data on clients' disability status (preferably using a methodology aligned to the Washington Group Short Set questions).	Data & MIS

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 1.B.3 The provider reports social performance data internally and externally	
1.B.3.1 The provider's social audits cover assessment of measures to prevent discrimination or exclusion of persons with disabilities and ensure accessibility, as well as practices related to any specific social goals the provider has identified related to disability inclusion.	Planning & performance management systems
1.B.3.2 The provider reports on disability inclusion within its published social performance reporting	Strategy & goals
Dimension 2. Committed Leadership	
Standard 2A. Members of the board of directors hold management accountable for achieving the provider's social goals.	
Essential Practice 2.A.1 Board composition reflects the provider's social strategy and sound governance practices.	
2.A.1.2 At least one active board member has experience with disability inclusion from partnering with OPDs. Alternatively, the provider may partner with OPDs or other specialized organisations to ensure appropriate consultation and technical expertise.	Leadership commitment Partnerships with OPDs
Essential Practice 2.A.2 The provider trains board members on their social performance management responsibilities.	
2.A.2.1 Training for board members on social performance management responsibilities includes specific training on disability rights and inclusion related to the provider's social goals, including compliance with the UNCRPD and local legislation and regulation.	Leadership commitment
Essential Practice 2.A.3 The board makes strategic decisions based on social and financial data.	
2.A.3.2 The data used by the board to monitor the providers' social strategy should include applicable disability-related data, for instance: <ul style="list-style-type: none"> • Outcomes data for clients with disabilities • Social audit data related to measures to prevent discrimination or exclusion of persons with disabilities and ensure accessibility 	Leadership commitment
2.A.3.3 The board uses the following data, provided by management, to monitor decent working conditions for employees (with the listed minimum frequency): <ul style="list-style-type: none"> • Employee turnover rate, by gender and disability status. Minimum frequency: annually. • Analysis of employee satisfaction surveys, disaggregated by gender and disability status. Minimum frequency: every two years. 	Leadership commitment

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 2B. Senior management is responsible for implementing the provider’s strategy for achieving its social goals.	
Essential Practice 2.B.1 The provider includes social goals in its operational plan and the CEO/Managing Director holds senior managers accountable for achieving social targets.	
2.B.1.1 The provider integrates targets and actions to ensure inclusion of persons with disabilities within its business or operational plan, as a target segment and / or as sub-segments within target segments, aligned to its social goals and targets	Planning & performance management systems
Essential Practice 2.B.2 Management makes strategic and operational decisions based on social and financial data.	
2.B.2.1 Senior management analyzes the following data and assesses risks (Minimum frequency: annually) <ul style="list-style-type: none"> • Analysis of client protection risks and client outcomes should take into account specific vulnerabilities of clients with disabilities, and disability inclusion. • Analysis of decent work conditions (health and safety, compensation and benefits, working conditions, accessibility and reasonable accommodations when required) 	Leadership commitment

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 3. Client-centered Products and Services	
Standard 3A. The provider collects and analyzes data to understand clients' needs.	
Essential Practice 3.A.1 The provider conducts market research and pilot testing.	
<p>3.A.1.1 Before introducing new products, services, or delivery channels, the provider conducts market research that includes gathering the following data about its target clients:</p> <ul style="list-style-type: none"> • Analysis of market share, market saturation, and potential market • Client profile data, including gender, age, disability status, location (urban/rural), and poverty/income level • Data on clients' needs, goals, and any obstacles to using financial services • Accessibility analysis of the new products, services, or delivery channels. <p>In addition, the provider includes persons with different socioeconomic and demographic characteristics, including persons with different types of impairments (physical, mental, intellectual or sensory impairments), in the design and pilot testing of new products or significant product changes, and seeks feedback on both appropriateness and accessibility.</p>	Inclusive design processes
Essential Practice 3.A.2 The provider uses data to identify patterns of financial behavior by client segment.	
3.A.2.1 The provider analyzes transactional data (PAR, average loan size, loan repayments, savings deposits and withdrawals by demographic and socioeconomic segments of its clients, including gender, age and disability status	Data & MIS
3.A.2.2 The provider analyzes product and service use (types and frequency) by persons with disabilities within its client base	Data & MIS
Essential Practice 3.A.3 Collect client feedback on their experiences using products and services.	
3.A.3.1 The provider conducts client satisfaction surveys with clients with disabilities using accessible channels. Minimum frequency: every other year.	Inclusive design processes
3.A.3.2 The provider conducts interviews with dormant and/or exiting clients with disabilities to look for evidence of product design failures.	Inclusive design processes

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 3B. The provider’s products, services, and channels benefit clients.	
Essential Practice 3.B.1 The provider uses insights from client data to design products, services, and delivery channels.	
3.B.1.1 The provider designs new products, services (financial and non-financial), and delivery channels using insights from market and pilot studies, including disability-inclusive research, client feedback mechanisms, and client outcomes data, including for clients with disabilities. The provider also dedicates resources (funds and employee time) to ensure accessibility and continuous improvement of these products, services, and delivery channels.	Inclusive design processes
3.B.1.2 The provider modifies its existing products and services in response to the needs, feedback, and outcomes of persons with different types of impairments, where required. (e.g. specific requirements of persons with disabilities for emergency loans, insurances; financing assistive devices etc.). The provider also dedicates resources (funds and employee time) to ongoing improvements in accessibility of products, services, and delivery channels.	Inclusive products
Essential Practice 3.B.2 The provider removes barriers that prevent access to financial products and services.	
3.B.2.2 The provider offers delivery channels (physical and digital) that are accessible for persons with different types of impairments (physical, mental, intellectual or sensory impairments).	Inclusive service delivery Physical accessibility Digital accessibility
Essential Practice 3.B.4 The provider's products and services help clients reduce their vulnerability to shock and smooth consumption.	
3.B.4.1 The provider offers products and services for basic needs, such as housing, energy, and education, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery
3.B.4.2 The provider offers products and services that help clients maintain stable levels of expenditure despite income fluctuations that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 3.B.5 The provider's products and services help clients achieve their goals.	
3.B.5.2 The provider offers products/services such as business loans for start-up, working capital, and investment. that enable clients to invest in economic opportunities, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery
3.B.5.3 The provider offers products/services for major life events such as weddings, maternity care/child birth, housing, higher education, and funerals, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery
Dimension 4. Client Protection	
Standard 4A. The provider does not overindebt clients.	
Essential Practice 4.A.1 The provider makes loan decisions based on a client's repayment capacity.	
4.A.1.1 The provider’s loan approval policies prohibit discrimination against persons with disabilities, and do not include requirements or eligibility criteria that directly or indirectly discriminate against or exclude persons with disabilities.	Loan approval and decisioning
Standard 4B. The provider gives clients clear and timely information to support client decision making.	
Essential Practice 4.B.1 The provider is transparent about product terms, conditions, and pricing.	
4.B.1.1 The provider gives a Key Facts Summary Document for borrowers in accessible and alternative formats for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats) before they sign a contract.	Transparency, fair treatment & safeguarding Accessible information & communication formats

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
<p>4.B.1.4-The provider communicates product information in ways that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).</p> <ul style="list-style-type: none"> • Loan contracts, savings documentation, transaction information, and insurance-related information (including policy information at enrollment and during the claims process) are provided in accessible and alternative formats for clients with different types of impairments (e.g. easy-read, large print, braille, audio formats, accessible digital formats). • Client-facing staff are trained in accessibility, inclusion and communication with clients with different types of impairments, to support informed decision making by clients with disabilities 	<p>Transparency, fair treatment & safeguarding</p> <p>Accessible information & communication formats</p>
<p>Essential Practice 4.B.2 The provider communicates with clients at appropriate times and through appropriate channels.</p>	
<p>4.B.2.1 The provider offers multiple channels for clients to ask questions or receive additional information prior to signing contract, including channels accessible to persons with different types of impairments (physical, mental, intellectual or sensory impairments).</p>	<p>Transparency, fair treatment & safeguarding</p> <p>Inclusive service delivery</p>
<p>4.B.2.2-The provider offers alternative mechanisms for registering client consent to a contract for clients who are unable to provide a signature.</p> <ul style="list-style-type: none"> • The provider makes a completed, signed copy of the contract available to clients with disabilities in accessible channels and formats (including online or physical documents). 	<p>Identification, authorization & verification</p>
<p>4.B.2.3 The provider gives clients with disabilities clear and accurate balance information in accessible channels and formats (including online or physical documents and messages).</p>	<p>Transparency, fair treatment & safeguarding</p> <p>Inclusive service delivery</p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 4C. The provider enforces fair and respectful treatment of clients.	
Essential Practice 4.C.1 The provider's code of conduct requires fair and respectful treatment of clients.	
<p>4.C.1.2 The provider’s policies prohibit discrimination against persons with disabilities (including by denial of reasonable accommodations to access products and services).</p> <ul style="list-style-type: none"> The provider provides information about the prohibited behaviors in its code of conduct in formats that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). Client-facing staff are trained in accessibility, inclusion and communication with clients with different types of impairments 	<p>Transparency, fair treatment & safeguarding</p> <p>Accessible information & communication formats</p>
Standard 4D. The provider secures client data and informs clients about their data rights.	
Essential Practice 4.D.2 The provider informs clients about data privacy and data rights.	
<p>4.D.2.1 When requesting consent, the provider explains in simple, local language (written or oral) how client data will be used, and ensures accessibility for clients with different types of impairments.</p> <ul style="list-style-type: none"> The provider trains clients on the importance of protecting their personal information (including Personal Identification Numbers (PINs), savings account balances, and information on repayment issues), ensuring that training is accessible and inclusive for clients with different types of impairments and provides appropriate adaptations where needed. The provider gives clients the right to withdraw their permission to use data and clearly explains any consequences of withdrawal, in accessible formats and with communication adapted for clients with different types of impairments. Client-facing staff are trained in accessible communication and interaction with clients with different types of impairments (physical, mental, intellectual, or sensory impairments), particularly in relation to data use, consent, and privacy. 	<p>Equitable access & risk mitigation</p> <p>Accessible information & communication formats</p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 4E. The provider receives and resolves client complaints.	
Essential Practice 4.E.1 The provider has a complaints mechanism that is easily accessible to clients and adapted to their needs.	
<p>4.E.1.2 The provider has at least two complaints channels that are free of charge and accessible, including to clients with different types of impairments (physical, mental, intellectual or sensory impairments).</p> <ul style="list-style-type: none"> If the complaint mechanism initially handles complaints through automated means, the provider makes a channel with live, human interaction available to clients, ensuring accessibility for clients with different types of impairments. <ul style="list-style-type: none"> Staff interacting with clients to handle complaints are trained in accessibility, inclusion, and communication with clients with different types of impairments. The provider ensures that clients with disabilities receive confirmation of receipt of their complaints and a notification when the complaint has been resolved in accessible formats (e.g. easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). 	<p>Transparency, fair treatment & safeguarding</p>
<p>4.E.1.3 The provider provides information to clients on how to submit a complaint in formats that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).</p>	<p>Transparency, fair treatment & safeguarding</p> <p>Accessible information & communication formats</p>
Dimension 5. Responsible Human Resource Development	
Standard 5A. The provider creates a safe and equitable work environment.	
Essential Practice 5.A.1 A written Human Resources policy is available to all employees that explains and protects their rights.	
<p>5.A.1.1 The provider’s Human Resource policy explains employees’ rights and responsibilities related to the following:</p> <p>5.A.1.1.7 Workplace accessibility and the provision of reasonable accommodations in the workplace, to enable persons with disabilities to participate in the workforce on an equal basis with others</p> <p>5.A.1.1.8. A zero-tolerance policy toward discrimination based on all Protected Categories including sex, disability, race, or religion.</p> <ul style="list-style-type: none"> The provider provides the Human Resources policy in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels) 	<p>HR management & development</p> <p>Accessible information & communication formats</p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
5.A.1.3 The provider’s non-discrimination policy towards employees covers persons with disabilities, and includes the requirement to provide reasonable accommodations to enable persons with disabilities to participate in the workforce on an equal basis with others	Policies & procedures
5.A.1.4 The provider analyzes employee data by gender and disability status and job position to check that men and women are equally represented at different levels of the organization, including men and women with disabilities.	HR management & development
Essential Practice 5.A.2 Employee compensation is equitable and adequate.	
5.A.2.3 The provider analyzes salary data to check that men and women, including men and women with disabilities, receive equal pay for equal work and have equal opportunities for pay increase/promotion.	HR management & development
Essential Practice 5.A.3 The provider has a safety and health management system.	
5.A.3.1 The provider assesses specific health and safety risks faced by employees with disabilities as part of its assessments	Workplace health & safety
5.A.3.3 The provider provides accommodations to ensure the health and safety of employees with disabilities, and includes measures to ensure the safety of employees with disabilities within emergency/disaster response plans.	Workplace health & safety
Standard 5B. The provider’s Human Resource Development system is designed to attract and maintain a qualified and motivated workforce	
Essential Practice 5.B.1 The provider gives employees complete employment documentation and training to understand their job requirements.	
5.B.1.1 The provider provides individual employment contracts and terms in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).	HR management & development Accessible information & communication formats
5.B.1.4 Men and women receive equal opportunities for training and skill development, and these opportunities are accessible and inclusive to employees with disabilities, including through the provision of reasonable accommodations. <ul style="list-style-type: none"> • All new employees receive orientation and job-specific training that is accessible and inclusive to employees with disabilities, including through the provision of reasonable accommodations. • The provider makes professional development opportunities available to employees at every level in an accessible and inclusive way for employees with disabilities, including through the provision of reasonable accommodations. 	HR management & development

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 5.B.2 The provider gives employees formal opportunities to communicate with management.	
5.B.2.2 Grievance mechanisms include channels that are accessible to allow employees with different types of impairments to raise workplace concerns in a confidential manner (e.g. audio formats, accessible digital channels).	HR management & development
Standard 5C. The provider’s Human Resource Development system supports its social strategy.	
Essential Practice 5.C.1 During the recruitment and hiring process, the provider assesses each candidate’s commitment to achieving the provider’s social goals and serving its target clients.	
5.C.1.4 The provider provides the Code of Conduct in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).	Accessible information & communication formats Recruitment & onboarding
Essential Practice 5.C.2 The provider trains all employees on its social goals and on client protection.	
5.C.2.2 The provider's training for employees includes training on specific client protection considerations for clients with disabilities	Staff engagement, awareness & training Transparency, fair treatment & safeguarding

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 6. Responsible Growth and Returns	
Standard 6A. The provider manages growth in a way that promotes its social goals and mitigates risks to clients.	
Essential Practice 6.A.1 The provider's strategic and/or business plan establishes responsible growth targets.	
6.A.1.3 The provider allocates funds and human resources to reinforce internal capacities for disability inclusion, such as: <ul style="list-style-type: none"> • inclusive hiring and employment practices including provision of reasonable accommodations; • training employees and partners on disability inclusion and accessibility; • integrating disability-related data in management information systems. 	Leadership commitment
Dimension 7. Environmental Performance Management	
Standard 7A. The provider has an environmental strategy and systems in place to implement it.	
Essential Practice 7.A.2 The provider collects, analyzes, and reports data that are specific to its environmental goals.	
7.A.2.1 The provider collects, analyzes and reports data on clients' vulnerability to climate change disaggregated by gender, age and disability status. The provider collects, analyzes and reports data on client outcomes related to its green products and services disaggregated by gender, age and disability status.	Data & MIS Inclusive design processes
Standard 7B. The provider identifies and manages environmental risks and opportunities.	
Essential Practice 7.B.2 The provider identifies and manages client-level environmental risks.	
7.B.2.1 The provider identifies specific vulnerabilities of clients with disabilities to climate change and environmental degradation	Inclusive design processes
7.B.2.3 The provider's risk mitigation policies and processes respond to the identified vulnerabilities of persons with disabilities to climate change and environmental degradation.	Inclusive design processes

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 7C. The provider offers financial and non-financial products and services to achieve its environmental goals	
Essential Practice 7.C.1 The provider offers financial products and services to achieve its environmental goals.	
7.C.1.1 The provider offers financial products or services to help clients cope with climate shocks that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products
7.C.1.2 The provider offers loans that allow its clients to implement or maintain green practices and technologies that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products
Essential Practice 7.C.2 The provider offers non-financial services to achieve its environmental goals.	
7.C.2.1-Information provided to raise clients' awareness of their climate-change vulnerability and environmental impacts in formats that are accessible to clients with different types of impairments (e.g. Easy-read, large print, Braille, audio formats, oral information, sign language, accessible digital channels). <ul style="list-style-type: none"> Awareness raising events or activities are accessible and inclusive for clients with disabilities. Staff carrying out awareness-raising talks and events are trained in accessibility, inclusion and communication with clients with different types of impairments. 	Client training & capacity building Accessible information & communication formats
7.C.2.2 Capacity-building activities to help clients reduce their climate-change vulnerability and environmental impacts are accessible and inclusive for clients with disabilities. <ul style="list-style-type: none"> Staff delivering capacity building activities are trained in accessibility, inclusion and communication with clients with different types of impairments. 	Client training & capacity building

5.2.2 Additional disability inclusion indicators: SPI5 Full

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Dimension 1. Social Strategy	
Standard 1B. The provider collects, analyzes, and reports data that are specific to its social goals.	
Essential Practice 1.B.2 The provider analyzes outcomes data by client segment.	
1.B.2.2 The provider analyzes outcomes for according to their client profile by: gender; age; disability status, location (urban/rural); poverty/income level	Data & MIS
Dimension 2. Committed Leadership	
Standard 2A. Members of the board of directors hold management accountable for achieving the provider’s social goals.	
Essential Practice 2.A.1 Board composition reflects the provider’s social strategy and sound governance practices.	
2.A.1.4. The board includes members representative of the provider’s target clients, including persons with disabilities, aligned to its social strategy. Alternatively, the provider may partner with OPDs to ensure appropriate representation of the perspectives of persons with disabilities.	Leadership commitment Partnerships with OPDs
Dimension 3. Client-centered Products and Services	
Standard 3A. The provider collects and analyzes data to understand clients' needs.	
Essential Practice 3.A.3 Collect client feedback on their experiences using products and services.	
3.A.3.3 The provider investigates whether particular stresses for households which include members with disabilities make it more difficult for persons with disabilities and / or their families / support persons to use its products and services	Inclusive design processes
Standard 3B. The provider’s products, services, and channels benefit clients.	
Essential Practice 3.B.3 The provider's products, services, and channels protect clients from harm.	
3.B.3.3 The provider accepts alternative forms of collateral from clients whose gender, disability status or age creates barriers to access in the local context.	Inclusive products
3.B.3.7 If the provider uses agents, it should have procedures to ensure agents comply with its client protection policies, including specific client protection measures related to clients with disabilities, and that services provided by agents are accessible for clients with disabilities.	Transparency, fair treatment & safeguarding

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Essential Practice 3.B.5 The provider's products and services help clients achieve their goals.	
3.B.5.1 The provider offers training to clients in areas where they have skill gaps that prevent them from achieving their goals, using training modalities, format, content and delivery that are accessible to and inclusive of persons with disabilities. -Staff carrying out training to clients are trained in accessibility, inclusion and communication with clients with different types of impairments.	Client training & capacity building Inclusive outreach
Dimension 4. Client Protection	
Standard 4A. The provider does not overindebt clients.	
Essential Practice 4.A.1 The provider makes loan decisions based on a client's repayment capacity.	
4.A.1.4 The provider's development processes and reviews of its algorithms include mitigation of bias against persons with different types of impairments.	Loan approval and decisioning
Standard 4B. The provider gives clients clear and timely information to support client decision making.	
Essential Practice 4.B.1 The provider is transparent about product terms, conditions, and pricing.	
4.B.1.5 If the provider uses agents, it verifies that agents provide sufficient documentation in accessible and alternative formats for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, accessible digital formats)	Transparency, fair treatment & safeguarding Accessible information & communication formats
Essential Practice 4.B.2 The provider communicates with clients at appropriate times and through appropriate channels.	
4.B.2.4 The provider gives clients with disabilities loan repayment reminders in accessible channels and formats (including online or physical documents).	Transparency, fair treatment & safeguarding Accessible information & communication formats

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Standard 4C. The provider enforces fair and respectful treatment of clients.	
Essential Practice 4.C.1 The provider's code of conduct requires fair and respectful treatment of clients.	
4.C.1.4 If the provider partners with third parties, it reviews the third party's code of conduct prior to signing a contract to check for commitment to fair and respectful treatment of clients, including clients with disabilities.	Transparency, fair treatment & safeguarding
Standard 4D. The provider secures client data and informs clients about their data rights.	
Essential Practice 4.D.1 The provider maintains the security and confidentiality of client data.	
4.D.1.1 The provider's policies should include measures that enable clients with different types of impairments to access its products and services, prioritizing independent access, while mitigating risks to the client and safeguarding the security of the client's data.	Equitable access & risk mitigation
Dimension 5. Responsible Human Resource Development	
Standard 5A. The provider creates a safe and equitable work environment.	
Essential Practice 5.A.3 The provider has a safety and health management system.	
5.A.3.2 The provider documents and reports to management all occupational accidents, injuries, and illnesses, disaggregated by gender and disability status and by position: Minimum frequency: annually.	Workplace health & safety
Standard 5B. The provider's Human Resource Development system is designed to attract and maintain a qualified and motivated workforce	
Essential Practice 5.B.2 The provider gives employees formal opportunities to communicate with management.	
5.B.2.3 The provider measures satisfaction and concerns of employees with disabilities with employment conditions, both in general and related to their specific needs.	HR management & development

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Standard 5C. The provider’s Human Resource Development system supports its social strategy.	
Essential Practice 5.C.1 During the recruitment and hiring process, the provider assesses each candidate’s commitment to achieving the provider’s social goals and serving its target clients.	
5.C.1.3 New employee orientation and induction training for client-facing staff includes checking and strengthening capacities for: <ul style="list-style-type: none"> -understanding and serving the needs and priorities of clients with disabilities within target segments -accessibility and inclusion, and -communicating clearly and respectfully with clients with different types of impairments (physical, mental, intellectual or sensory impairments) 	Recruitment & onboarding Staff engagement, awareness & training
Essential Practice 5.C.2 The provider trains all employees on its social goals and on client protection.	
5.C.2.1 The provider trains all employees on disability awareness and inclusion and how they can contribute in their role to ensure inclusion of persons with disabilities	Staff engagement, awareness & training
Dimension 7. Environmental Performance Management	
Standard 7B. The provider identifies and manages environmental risks and opportunities.	
Essential Practice 7.B.1 The provider identifies and manages its own environmental risks at headquarters and branch level.	
7.B.1.2 The provider provides accommodations to ensure the health and safety of employees with disabilities, and includes measures to ensure the safety of employees with disabilities within emergency/disaster response plans. <ul style="list-style-type: none"> - The provider's disaster contingency plan is provided in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). 	Workplace health & safety Accessible information & communication formats
Essential Practice 7.B.3 The provider identifies opportunities to finance green practices and technologies.	
7.B.3.3 Market research modalities for assessment of demand for green practices and related financial needs of target clients are accessible and enable fair representation and participation of persons with different types of impairments.	Data & MIS Inclusive design processes

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