

Disability Inclusion Guide for Financial Services Providers (FSPs)

CHAPTER 1: Overview of Disability Inclusion For FSPs



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TABLE OF CONTENTS

ACKNOWLEDGEMENTS	3
ACRONYMS AND ABBREVIATIONS	4
CHAPTER 1: OVERVIEW OF DISABILITY INCLUSION FOR FSPs	6
1.1 Context	6
1.2 Why disability inclusion matters for FSPs	6
1.3 Building blocks of disability inclusion for FSPs	7
1.4 The disability inclusion journey	9
1.5 Getting started	11
1.6 Resources and case studies	13

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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

CHAPTER 1: OVERVIEW OF DISABILITY INCLUSION FOR FSPs

1.1 Context

An estimated **1.3 billion people - around 16% of the global population - live with a disability**, yet they remain disproportionately excluded from economic opportunities and financial systems. Globally, persons with disabilities are more likely to experience poverty as a result of **systemic exclusion** from access to education, employment, healthcare, and essential services. **Women with disabilities** experience particular marginalization, arising from both their gender and their disability.

These structural inequalities are not caused by a lack of inherent capability, but by **social and environmental barriers**. The UN Convention on the Rights of Persons with Disabilities (UNCRPD) recognizes that disability arises from the interaction between **physical, mental, intellectual or sensory impairments** experienced by individuals, and **barriers in society**, such as inaccessible infrastructure, communication barriers, negative attitudes and discrimination. Persons with disabilities are a diverse group; individuals with **different types of impairments** face different barriers, requiring different solutions.

Disability inclusion means **identifying and removing these barriers**, so that persons with disabilities can exercise their right to participate fully in all areas of life. This requires **active engagement** with persons with disabilities and their representative organizations of persons with disabilities (OPDs) to develop solutions that meet their needs. Further information on disability and key disability inclusion concepts is provided in **Chapter 2** of this guide.

1.2 Why disability inclusion matters for FSPs

Despite rapid advances in financial inclusion globally, persons with disabilities continue to face **multiple barriers to accessing and using financial services**. As a result, many persons with disabilities are forced to rely on informal financial mechanisms, or remain excluded from financial services entirely.

Persons with disabilities experience **systemic barriers to financial inclusion** linked to higher rates of informal and self-employment, lower or irregular incomes, and lower levels of financial and digital literacy. **Barriers at the FSP level** include inaccessible infrastructure in branches, ATMs and digital channels; lack of information in accessible formats; discriminatory attitudes and policies, barriers in product and service design; and lack of staff trained to serve clients with disabilities. These barriers are **reinforced at sector level** by low awareness of disability inclusion, limited enabling regulatory frameworks, and a lack of disability-related data.

For financial services providers (FSPs), addressing these barriers is both a **social responsibility and a business opportunity**. Persons with disabilities are present in **every population subgroup**- whichever client segments you serve, it is highly likely that there are persons with disabilities within these, and they are often amongst the most marginalized members. Taking action to include persons with disabilities within your activities **extends your impact** for your target segments – while failing to address barriers that prevent their participation risks reinforcing their marginalization.

Furthermore, persons with disabilities represent a **large, growing and underserved market segment**, providing a significant **economic opportunity**. Evidence shows persons with disabilities can be profitable clients and successful entrepreneurs when barriers to access are addressed.

Implementing disability inclusion brings wider business benefits by **fostering innovation** and user-centered approaches. Measures to improve accessibility also benefit other groups, such as older persons, and **enhance the user experience** for all clients, driving improved satisfaction and retention. Employing persons with disabilities gives access to an **untapped talent pool**, bringing new skills and perspectives, and enhances teamwork and staff engagement.

Many countries have legal frameworks enforcing non-discrimination and equal access for persons with disabilities. A proactive approach to disability inclusion not only **mitigates compliance risk**, but also **enhances brand reputation**, contributing to **long-term sustainability**.

These topics are explored more fully in **Chapter 3** of this guide.

1.3 Building blocks of disability inclusion for FSPs

Disability inclusion requires an **enterprise-wide approach**, with active involvement of operational and technical teams, and cross-functional collaboration. This guide presents a framework of **seven essential building blocks** for FSPs to integrate disability inclusion across their strategy, operations, products and services.



This table shows how these **seven building blocks** contribute to disability inclusion outcomes, **key components** within them, and the **organizational functions and teams** typically involved in delivery.

Table 1 Building blocks for disability inclusion

Building blocks	Inclusion outcomes	Components	Organizational functions
1. Strategy and Culture	An organizational commitment to disability inclusion goals, championed by top leadership and shared by manager and staff.	<ul style="list-style-type: none"> • Strategy and goals • Leadership commitment • Staff engagement, awareness and training 	Board, leadership team; DEI / GEDSI leads; strategy & planning, staff training; internal & external communications.
2. Management Frameworks	Disability inclusion strategies are operationalized through organizational planning, management and monitoring frameworks.	<ul style="list-style-type: none"> • Planning and performance management systems • Policies and procedures • Data and MIS 	Leadership team; business planning and budgeting; IT and Information systems; market research; risk and compliance.
3. Accessibility	Workplaces, service points and information can be accessed and used by persons with disabilities on an equal basis with others.	<ul style="list-style-type: none"> • Physical accessibility • Digital accessibility • Accessible information and communication formats 	Premises management, procurement, branch operations, channel managers, IT developers, marketing and communications.
4. Inclusive Products and Services	Persons with disabilities can access and use products and services appropriate to their needs to achieve beneficial outcomes.	<ul style="list-style-type: none"> • Inclusive design processes • Inclusive products • Inclusive service delivery • Inclusive outreach • Client trainings and capacity building 	Market research; product and service design; channel and product managers; client servicing; staff training; marketing and outreach.

Building blocks	Inclusion outcomes	Components	Organizational functions
5. Client Protection	Clients with disabilities do not experience adverse consequences from using the FSP’s products and services.	<ul style="list-style-type: none"> • Transparency, fair treatment and safeguarding • Loan decisioning and approval processes • Equitable access and risk mitigation • Identification, authorization and verification 	Client protection; risk & compliance; channel and product managers; client servicing; staff training.
6. Inclusive Employment	An inclusive workplace where persons with disabilities have equal opportunities to participate and thrive throughout the employment cycle.	<ul style="list-style-type: none"> • Recruitment and onboarding • HR management and development • Workplace health and safety 	Human resources management; line managers; workplace health & safety representatives; staff training.
7. Partnerships	Disability inclusion strategies are designed and implemented in collaboration with persons with disabilities and apply best practices.	<ul style="list-style-type: none"> • Partnerships with OPDs • Other partnerships and networks 	Leadership teams; marketing and outreach; partnership managers.

Chapter 4 of this guide provides a toolkit for each of these building blocks and components, giving an overview of disability inclusion practices, action points, case-study examples, and links to more detailed resources for implementation.

1.4 The disability inclusion journey

Disability is not achieved through one project, or good intentions alone. Instead, it is realized **progressively over time**, through a series of **planned, intentional actions** driven by a shared organizational commitment.

The framework below illustrates **progressive levels of disability inclusion** as a journey of continuous improvement, with examples of benchmarks at each level. These are intended to be illustrative rather than prescriptive – your individual journey may be different, depending on your overall strategy and operating model, the context in which you operate, and your resources and capabilities.

- **Level 1: Foundational:** Initial accessibility measures and service adaptations in place, with pilot initiatives to serve and learn from persons with disabilities.
- **Level 2: Integrating:** Disability inclusion is integrated into systems, policies and practices, extending access to inclusive products, services and employment opportunities.
- **Level 3: Embedded:** Disability inclusion is part of the core business strategy, embedded in organizational culture, operations, products and services.

Table 2 Illustrative benchmarks for disability inclusion

Building blocks	Level 1: Foundational	Level 2: Integrating	Level 3: Embedded
1. Strategy and Culture	Leadership sensitized; organizational goal established; disability inclusion champion appointed; selected staff trained.	Targets and indicators monitored; staff induction includes awareness training; role-specific training for client-facing and HR staff.	Disability inclusion is a core part of business strategy; comprehensive staff training programs; promoting inclusion internally and externally.
2. Management Frameworks	Non-discrimination policy covers disability; initial actions assigned; disability data collected in client onboarding.	Disability inclusion reflected in operating plans; client and HR policies updated; disability-disaggregated data collected.	Disability inclusion embedded in planning, performance management, policy frameworks and MIS.
3. Accessibility	Basic accessibility improvements in selected locations and channels; accessible document protocols.	Accessibility standards applied in new premises and digital channels; key client information in accessible formats.	Majority of facilities and digital channels accessible; information available in accessible formats across all channels.
4. Inclusive Products and Services	Initial needs assessment conducted; basic product and service adaptations piloted; initial outreach through OPDs.	Inclusive research and disability-disaggregated data inform product, service and channel design; accessible servicing channels expanded; accessible client trainings.	Inclusive design processes embedded; flexible servicing options across all channels; systematic outreach and engagement; inclusive and tailored client trainings.

Building blocks	Level 1: Foundational	Level 2: Integrating	Level 3: Embedded
5. Client Protection	Staff trained to communicate client protection information accessibly; accessible complaints mechanisms available; no discriminatory eligibility criteria.	Client protection policies address risks of exploitation and discrimination; alternative authentication and supported decision-making options available.	Safeguarding framework implemented to prevent abuse or exploitation; risk mitigation within product design; inclusive loan decisioning processes.
6. Inclusive Employment	Job advertisements encourage persons with disabilities to apply; accommodations available; workplace safety assessed on a case-by-case basis.	Inclusive recruitment processes and workplace accommodation procedures implemented; disability-sensitive grievance and workplace health and safety mechanisms in place.	Proactive recruitment of persons with disabilities; inclusive career development pathways; disaggregated workforce metrics monitored to promote equity.
7. Partnerships	Initial engagement with Organizations of persons with disabilities (OPDs) to support needs assessment and outreach.	Regular collaboration with OPDs on outreach, training and program design; working with disability organizations to build capabilities.	Strategic long-term partnerships with OPDs; co-design of programs and services; sector leadership, knowledge sharing and promotion of inclusion.

1.5 Getting started

Many FSPs recognize disability inclusion as the ‘right thing to do’, but don’t know how to start with implementation, or feel it is too costly, or requires specialized expertise. However, you can start to improve accessibility and inclusion by **piloting simple solutions** that need no technical expertise and little resources, and gradually extending these over time.

It is important from the outset to gain **commitment from top leadership** and **engage with OPDs** to support **needs assessment** and **outreach**. Carry out an **internal assessment** to identify and prioritize key barriers to address. Use these insights to **design and implement pilot interventions**, and start **collecting disability data** to monitor and refine strategies.

The information box below outlines a **simple process and steps to start your disability inclusion journey** using this approach. Within this, specific actions can be adapted to your situation – for example, rather than pilots in branches, a digital financial services provider could train key staff to conduct an initial digital accessibility assessment, and pilot “quick fixes” to its apps through user-testing with OPDs. The **case studies** in **section 1.6** below provide examples of approaches taken by different FSPs to advance disability inclusion.

Info box: First steps

Step 1: Awareness and commitment

- **Hold sensitization workshops** with the Board and leadership team to build a common understanding of disability inclusion principles, and the rationale for disability inclusion.
- **Investigate applicable legal and policy frameworks** for accessibility and inclusion.
- **Agree a high-level goal** for disability inclusion, aligned to your mission and values.
- **Establish a non-discrimination policy** that prohibits discrimination on the basis of disability.

Step 2: Engagement and needs assessment

- **Identify and engage** with potential OPDs partners.
- **Gather information from persons with disabilities** in your target communities, through dialogue with OPDs / research / feedback from existing clients with disabilities.
- **Assess the needs of persons with disabilities** and the extent to which your products, services and channels meet these.

Step 3: Internal assessment and planning

- **Conduct baseline assessment** of disability inclusion practices and capabilities (see assessment tools in the resources list below).
- **Identify gaps** and prioritize short-, medium- and long-term actions.
- **Design initial adaptations required** to start serving persons with disabilities as clients.

Step 4: Piloting & learning

- **Select locations / channels / applications** for initial pilots.
- **Make initial accessibility improvements**, focusing on low-cost solutions with greatest impact for clients (e.g. install ramps or use provide portable ramps at entrances; create client servicing area on ground floor).
- **Apply simple products and servicing adaptations** (e.g. flexible KYC processes; priority servicing at branches; provide alternatives such as digital onboarding or home visits).
- **Train staff at pilot locations** on serving clients with disabilities.
- **Start outreach through OPDs** (e.g. hold information sessions and trainings; arrange branch visits; provide hands-on support to access and use products and services).
- **Introduce procedures to collect disability data** from clients during onboarding.
- **Analyze data and collect feedback** from persons with disabilities to inform future strategies.

Use the learnings from these pilot interventions to develop **protocols, guidelines and tools** to implement accessibility improvements and servicing adaptations your networks and channels, and roll out **staff training**. Extend **disability data collection and analysis** and **deepen your collaboration with OPDs** to design further product and service enhancements. As you progress, build objectives and targets for disability inclusion into your **operating plans**, and start to integrate disability-inclusive practices within your **client servicing, client protection and HR policies and procedures**.

As you continue your journey, conduct **periodic assessments** to monitor your progress and refine your strategies through a process of ongoing improvement- **section 1.6** below includes **tools for self-assessment** and gap analysis. Use the **toolkits in chapter 4 of this guide** to develop action plans at each stage in your journey, and resources to support implementation.

1.6 Resources and case studies

Self-assessment tools:

- **Disability inclusion indicators aligned to Cerise+SPTF's Universal Standards for Social and Environmental Performance Management (USSEPM)**. Use these indicators to assess your disability inclusion practices to identify areas for improvement and monitor progress as part of your social performance management.
- **Asian Development Bank (2025), 'Making Progress: A Self-Assessment Tool'**: a free online disability inclusion self-assessment tool for FSPs. Uses a multiple-choice survey on practices across four domains (Culture, Employment, Partnerships, Customer Services) to generate a comprehensive dashboard report with suggested actions.
- **ILO Global Business and Disability Network (GBDN), 'ILO GBDN Self-Assessment Tool'**: a free online disability inclusion self-assessment for companies in general, with a focus on inclusive employment. Uses a multiple-choice survey on practices in four areas (Fundamentals, Culture, Customer, Allyship) to generate a status report.

Case studies and examples:

- Goldstein, J. et al (2014), '[A New Financial Access Frontier: A Framework for Disability Inclusion](#)', **CFI at ACCION**: Outlines a framework for disability inclusion for FSPs developed through a pilot implementation with Fundación Paraguaya, covering: Universal Design; accessibility; reasonable accommodation; partnerships; legal frameworks, HR policy; staff training; technology solutions and client trainings.
- **Microfinance and Disability-Project in Uganda**, implemented by the Association of Microfinance Institutions of Uganda (AMFIU) with the National Union of Disabled Persons in Uganda (NUDIPU), supported by the Norwegian Association of Disabled (NAD). This pilot project found that:
 - MFIs increased the number of persons with disabilities they served without providing 'special' products or conditions for persons with disabilities.
 - This was achieved mostly through **simple and low-cost interventions**, for example, a 90-minute disability awareness and inclusion training for credit officers.

- The most important barriers to start by addressing relate to low self-esteem of persons with disabilities, and attitudes of MFI staff and management.

(Source: Bwire, F., Mukasa, G. and Mersland R. (2009), '[Access to Mainstream Microfinance Services for Persons with Disabilities; Lessons Learned from Uganda](#)', *Disability Studies Quarterly*, Vol. 29, No. 1)

- **Opportunity Bank of Uganda (OBUL)** extended its commitment to inclusive finance through the 'Mainstreaming finance for people with disability' initiative, with an initial focus on:
 - **Branch accessibility**, including ramps, lowered counters, and sign language support.
 - **Training frontline staff** to serve clients with diverse abilities.
 - **Data-driven strategies**, collecting and analyzing disaggregated data to target outreach and drive inclusive servicing improvements.
 - **Community engagement** to raise awareness, build trust, and promote financial literacy among persons with disabilities.

OBUL now serves more than 30,000 clients with disabilities, from a start-point of 200. It continues to expand its disability inclusion strategy by **scaling inclusive practices** across the branch network; **digital innovation** to reach underserved clients, **partnerships** to co-design and deliver inclusive services; and **staff development** to embed a culture of inclusion.

(Source: Opportunity International (2025), '[Using the Washington Group Short Set \(WGSS\) in Inclusive Finance: Cheat Sheet](#)')

- **Fundación Paraguaya** embarked on its journey to **embed disability inclusion** within its financial and social programs in 2012.
 - Fundación Paraguaya's approach is centered on belief in the commercial viability of clients with disabilities, with a focus on:
 - Building an inclusive culture across the organization, reinforced by awareness training for staff, and strong engagement with the disability community.
 - Building lasting partnerships with OPDs and leveraging the expertise of disability support organizations and networks.
 - Enabling persons with disabilities and their family members to access mainstream products and services through proactive outreach, accessible servicing and accommodations, rather than offering 'special' products or preferential credit conditions.
 - Developing cost-effective methodologies to integrate disability inclusion throughout its existing operations.
 - Fundación Paraguaya has seen institutional benefits through strengthened organizational culture and staff engagement, increased capabilities in inclusive design practices, and enhanced brand and reputation, as well as acquiring new customers.

(Source: Barrier-Free Finance Initiative (2025), '[From pilot to mainstream: Fundación Paraguaya's journey to serve people with disabilities \(PWD\) \(2012– 2025\)](#)')

- **Chamroeun Microfinance Plc and Good Return** implemented a joint project from 2019-2023 using a **twin-track approach** to advance access to finance for micro-entrepreneurs with disabilities in Cambodia.
 - They partnered with OPDs through all stages of project design and implementation, and collaborated with disability support organizations for capacity building support.
 - They conducted a comprehensive needs assessment with persons with disabilities to shape a targeted intervention, combining accessible financial literacy coaching and a tailored loan product.
 - In parallel, Chamroeun completed a Disability Inclusion Scorecard assessment to create a disability inclusion mainstreaming plan. This included piloting and rolling-out disability inclusion training for all staff, a branch accessibility assessment and adaptation program, and inclusive recruitment practices.
 - To ensure sustainability at the end of the project, Chamroeun incorporated the accessibility features of the tailored loan into its standard loan product, and Good Return continued to support OPD partners to provide financial coaching for persons with disabilities.

(Source: Good Return and Chamroeun Microfinance Plc (2023), [‘Finance for All: A practical guide to Disability Inclusion for Financial services Providers in Cambodia’](#), Disability Action Council of Cambodia & ACCESS Program)

- **CFI at Accion and v-shesh Learning Services** implemented a project with three partner MFIs in India, to increase outreach and inclusion of persons with disabilities. Key activities included:
 - Conducting research with clients with disabilities and FSP staff.
 - Sensitization workshops for FSP board and leadership teams, and training for FSP staff through a training of trainers (ToT) approach.
 - Partnerships with OPDs, providing capacity-building training, and targeted outreach.
 - Collecting disability data from clients, and incorporating this in application forms and MIS systems.
 - Including the number of clients with disabilities in branch and MFI performance dashboards.
 - Accessibility audits in sample FSP branches and offices
 - Developing accessibility solutions, accommodations, and process improvements using Universal Design principles.
 - Providing key client documents in accessible formats and channels, training front-line staff in sign-language, and making all client workshops, trainings and group meetings inclusive.
 - Creating policies and procedures for recruitment of persons with disabilities.
 - Creating checklists, manuals and tools for FSP staff to sustain disability inclusion measures.

(Source: Access Development Services and UNDP (2014), [‘Financial Inclusion of Excluded Segments - Learning from Experience Delivery of Financial Services to People with Disabilities’](#))

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