



BARN OCH KVINNOR ORGANISATION

Children & Women Organisation

Faith · Action · Results

DISABILITY INCLUSION & ACCESSIBILITY POLICY

Ensuring Every Child and Person with a Disability is Seen, Valued, Included and Empowered

Policy Owner	Board of Directors
Approved By	Founder & President, on behalf of the Board of Directors
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Policy Commitment

Barn Och Kvinnor Organisation ("BOK", "the Organisation") is committed to the full inclusion, dignity, rights, safety, participation and empowerment of every child and person living with a disability. Children with disabilities are not a footnote in our programmes they are central to our mission. The Organisation regards disability inclusion as a matter of rights, justice and human dignity, consistent with international and European legal standards, and not as an act of discretionary charity.

Barn Och Kvinnor Organisation *herein after* BOK is committed to removing the legal, physical, communicational, economic and attitudinal barriers that prevent persons with disabilities from participating equally in education, healthcare, livelihoods, community life, legal protection, decision-making and organisational activities. The Organisation further recognises the particular barriers faced by women and girls with disabilities, and by the families and caregivers who support children with disabilities.

1. Purpose

This Policy sets out the principles, legal commitments and operational practices through which Barn Och Kvinnor Organisation achieves meaningful disability inclusion and accessibility across its programmes, partnerships, communications and internal governance.

This document is issued as a donor- and partner-facing statement. It demonstrates to institutional donors, foundations, grant-making bodies, partner organisations and regulatory authorities — including those based in the European Union and the European Economic Area — that disability inclusion is embedded within BOK's programme cycle, governance, budgeting, safeguarding, data protection, monitoring and organisational culture, and is administered in a manner consistent with applicable European and international legal standards.

2. Scope

This Policy applies to:

- All programmes, projects and activities delivered by BOK in Uganda and Kenya, and any future countries of operation.
- All Board members, employees, volunteers, interns, consultants and individuals acting on behalf of BOK.
- All partner organisations, implementing partners, sub-grantees and contracted service providers.
- All communications, publications, donor reports, funding applications, social media content and public engagement associated with BOK.
- BOK's governance, organisational culture, recruitment, meetings, events and internal operations.
- Programme planning, budgeting, procurement, implementation, monitoring, evaluation and learning.
- The processing of personal data relating to children and persons with disabilities by BOK or on BOK's behalf, wherever that processing occurs.

3. Legal and Regulatory Framework

Barn Och Kvinnor Organisation is a not-for-profit entity constituted and registered in Sweden (Reg. No. 802511-3658), and additionally registered to operate in Uganda (Reg. No. 80020003906032) and, through partnership

arrangements, in Kenya. As a Swedish-registered organisation operating internationally, BOK aligns its disability inclusion practice with the following legal and regulatory instruments:

3.1 European and Swedish Legal Framework

- **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD, 2006):** ratified by the European Union as a regional integration organisation in 2010, and by Sweden in 2008, establishing binding obligations on States Parties and EU institutions to promote the rights of persons with disabilities.
- **Charter of Fundamental Rights of the European Union:** in particular Article 21 (non-discrimination) and Article 26 (integration of persons with disabilities), which inform BOK's internal governance standards and its expectations of European partners and donors.
- **European Accessibility Act (Directive (EU) 2019/882):** referenced as a benchmark of good practice for the accessibility of information, digital communications and services provided to European stakeholders, including donors and supporters with disabilities.
- **Regulation (EU) 2016/679 (General Data Protection Regulation — “GDPR”):** applied by BOK as its baseline standard for the lawful, fair and transparent processing of personal data — including special category data concerning health and disability — relating to children, beneficiaries, donors and staff, irrespective of where such data is processed.
- **Swedish Discrimination Act (Diskrimineringslagen, SFS 2008:567):** and the Swedish Act on Associations and Foundations, which inform BOK's internal anti-discrimination standards and governance obligations as a Swedish legal entity.

3.2 International and Regional Frameworks

- United Nations Convention on the Rights of the Child (UNCRC, 1989).
- African Charter on the Rights and Welfare of the Child (1990).
- United Nations Sustainable Development Goals, in particular Goal 4 (Quality Education), Goal 5 (Gender Equality), Goal 8 (Decent Work and Economic Growth), Goal 10 (Reduced Inequalities) and Goal 16 (Peace, Justice and Strong Institutions).

3.3 National Legislation — Uganda and Kenya

- Persons with Disabilities Act 2020 (Uganda) and the National Policy on Disability in Uganda.
- Children Act (Cap 59) (Uganda).
- Persons with Disabilities Act 2003 (Kenya), as amended, and applicable Kenyan child protection legislation.

Where the standards set out in this Policy exceed the minimum requirements of applicable national law, BOK applies the higher standard. Where a conflict arises between this Policy and mandatory local law, BOK will comply with local law while seeking, through advocacy and partnership, to uphold the underlying rights this Policy protects.

4. Our Operating Context

BOK's disability inclusion work is rooted in direct engagement with children and families experiencing barriers related to disability, poverty, gender and geographic access. In Wakiso District, Uganda, and through relevant partnerships in Mombasa, Kenya, children with disabilities may face physical inaccessibility, social stigma, exclusion from education and healthcare, limited access to rehabilitation and assistive equipment, and substantial financial and caregiving burdens on their families.

Girls and women with disabilities experience intersecting forms of discrimination and heightened risk of violence, exclusion and poverty. Caregivers, who are predominantly women, may face significant economic and psychosocial

pressure as a result. BOK accordingly addresses disability inclusion in conjunction with child protection, gender equality, economic empowerment, health, education, legal advocacy and, where necessary, humanitarian assistance.

5. Definitions

Disability	A physical, intellectual, sensory, neurological or developmental condition that, in interaction with attitudinal, environmental and institutional barriers, limits a person's full and equal participation in society, consistent with Article 1 UNCRPD.
Social Model of Disability	The recognition that disability is shaped not only by impairment but by physical, attitudinal, cultural, legal and institutional barriers. Inclusion therefore requires changes to environments, systems and attitudes, in addition to appropriate individual support.
Child with a Disability	Any person under the age of 18 whose participation in family, community, educational or social life is restricted by the interaction of an impairment with environmental or attitudinal barriers.
Reasonable Accommodation	Practical modifications or adjustments, not imposing a disproportionate or undue burden, that enable a person with a disability to participate on an equal basis with others.
Assistive Technology and Equipment	Devices and tools that support independence and participation, including wheelchairs, walkers, standing frames, hearing aids, communication devices and other appropriate assistive products.
Inclusive Programming	Programme design and delivery that proactively identifies and addresses barriers to participation, ensuring that persons with disabilities are engaged as participants and rights-holders rather than passive beneficiaries.
Special Category Data	Personal data revealing health status or disability, defined under Article 9 GDPR as requiring enhanced protection and a specific lawful basis for processing.

6. Policy Statement

BOK holds the foundational conviction that every child, regardless of the nature or severity of their disability, possesses inherent dignity and an unconditional right to protection, inclusion, care, education, participation and the opportunity to live a full and meaningful life.

This conviction is given legal expression through BOK's alignment with the UNCRPD, the UNCRC, the African Charter on the Rights and Welfare of the Child, the Charter of Fundamental Rights of the European Union, and applicable national legislation in Sweden, Uganda and Kenya, as detailed in Section 3.

BOK recognises that disability inclusion cannot be reduced to the provision of equipment or material assistance. Genuine inclusion requires addressing stigma, inaccessible environments, unequal systems and barriers to participation, while placing children, persons with disabilities and their families at the centre of decisions that affect them.

7. Core Principles

- **Rights-Based Approach:** persons with disabilities are rights-holders, not objects of charity; every action under this Policy is grounded in justice, not generosity.
- **Nothing About Them Without Them:** children and persons with disabilities, families and caregivers are meaningfully involved in decisions affecting them.
- **Non-Discrimination and Equality:** BOK does not tolerate discrimination on grounds of disability, consistent with Article 21 of the EU Charter of Fundamental Rights.
- **Dignity and Do No Harm:** all activities and communications must protect the dignity, privacy and safety of the individuals concerned.
- **Accessibility:** BOK identifies and progressively removes physical, communication, financial, informational and attitudinal barriers.
- **Intersectionality:** disability is considered together with gender, age, poverty and geographic location.
- **Participation and Empowerment:** BOK seeks to strengthen the agency, voice and decision-making capacity of persons with disabilities.
- **Safeguarding:** children and adults with disabilities receive protection appropriate to their heightened vulnerability to abuse, exploitation and neglect.
- **Data Protection by Design:** the processing of personal and special category data relating to disability is minimised, secured and lawfully justified at every stage.
- **Sustainability:** programmes seek lasting benefit and local capacity rather than unnecessary dependency.
- **Accountability and Transparency:** BOK commits to honest reporting of achievements, challenges, learning and use of resources to its donors and the public.

8. Accessibility Commitment

BOK will progressively improve accessibility across its programmes and organisational activities, applying the European Accessibility Act as a reference standard of good practice, and recognising that accessibility is an ongoing process that must reflect the practical needs of the people the Organisation serves.

- Programme venues will be selected or adapted to improve physical access wherever reasonably possible.
- Information will be communicated in formats appropriate to participants' needs, including simple language and alternative formats where feasible.
- Reasonable accommodation will be considered for meetings, training, consultations and events.
- Communication support, including sign-language or other appropriate assistance, will be considered where required and resources permit.
- Digital communications, including donor-facing materials, will be developed with accessibility in mind, including readable layouts, clear language and alternative text for important images.
- Transport and distance barriers will be considered when planning outreach and service delivery.
- BOK will identify accessibility barriers through consultation with persons with disabilities and caregivers.

9. Programme Integration

Disability inclusion is integrated across the full programme cycle rather than treated as a discrete activity.

9.1 Needs Assessment

Community assessments consider disability-specific barriers, including physical access, stigma, communication, education, healthcare, transport, economic constraints and caregiver needs.

9.2 Programme Design and Beneficiary Selection

Programmes are designed from the outset to include persons with disabilities. Eligibility and selection criteria are reviewed to avoid the inadvertent exclusion of children with disabilities, women with disabilities or caregivers.

9.3 Implementation, Monitoring and Reporting

Activities are delivered in locations, formats and timeframes that enable meaningful participation. Monitoring frameworks include disability-disaggregated data and indicators relating to participation, access, outputs and outcomes. Donor and programme reports include relevant disability inclusion results, challenges, adaptations and lessons learned.

10. Key Programme Commitments

- **Assistive Equipment:** BOK sources, transports and delivers appropriate assistive equipment such as wheelchairs, walkers, standing frames and related devices, accompanied where appropriate by family orientation, referral and follow-up.
- **Rehabilitation and Therapy:** BOK facilitates access to rehabilitation and therapy support, including through specialist professionals and referral partnerships, subject to available resources.
- **Education:** BOK supports efforts to reduce barriers to education and advocates for inclusive educational opportunities.
- **Nutrition and Humanitarian Assistance:** targeted nutritional or humanitarian assistance is provided where disability, poverty or crisis creates heightened vulnerability.
- **Outreach and Identification:** outreach identifies children who are isolated, hidden or unable to access services, and connects them with appropriate support and referrals.
- **Caregiver Support:** BOK recognises caregiver wellbeing as integral to child wellbeing and supports referrals, peer networks, psychosocial support and economic empowerment opportunities.
- **Women's Economic Empowerment:** women with disabilities and women caring for children with disabilities are considered within BOK's economic empowerment, skills development and livelihood programmes.
- **Legal Advocacy and Protection:** BOK promotes access to legal information, protection and advocacy for vulnerable children, women and persons with disabilities, including in relation to discrimination and violence.

11. Disability-Inclusive Budgeting and Financial Accountability

BOK recognises that meaningful inclusion requires dedicated resources. Disability inclusion considerations are incorporated into programme budgets and funding proposals where relevant, covering:

- Assistive equipment and associated maintenance or follow-up needs.
- Transport and outreach costs.

- Accessibility adaptations.
- Communication and reasonable accommodation.
- Training and disability-awareness activities.
- Rehabilitation, therapy and referral support where included in programme design.
- Monitoring, data collection and accountability activities.

BOK seeks appropriate donor funding for disability inclusion costs and reports relevant expenditure and results transparently, in accordance with applicable donor requirements and, where relevant, Swedish accounting and non-profit governance standards.

12. Participation and Representation

- Children with disabilities are given safe, age-appropriate opportunities to express their views.
- Parents and caregivers are consulted on matters affecting children, while respecting the child's evolving capacity and rights.
- Persons with disabilities and representative organisations are engaged as consultation and partnership resources.
- Programme design and evaluation incorporate feedback from participants.
- BOK progressively strengthens opportunities for persons with disabilities to contribute to organisational learning and decision-making.

13. Safeguarding and Child Protection

Children with disabilities may face heightened risk of abuse, neglect, exploitation and violence. All activities involving children with disabilities must comply with BOK's Safeguarding Policy.

- Personnel working directly with children must comply with safeguarding requirements and relevant codes of conduct, and sign BOK's Safeguarding Commitment Declaration.
- Home visits and outreach use appropriate safety procedures, including two-person visits where feasible, and are documented.
- Informed consent is obtained before interventions, data collection or photography, subject to safeguarding and legal requirements.
- Children are never portrayed in degrading, sensationalised or exploitative ways in any communication or fundraising material.
- Safeguarding concerns are reported immediately through BOK's established reporting procedures to the Safeguarding Lead.
- Risks relating to caregivers, service providers, community members and staff are considered in safeguarding risk assessments.
- BOK does not tolerate sexual exploitation, abuse, harassment, financial exploitation, neglect, or retaliation against any person who raises a concern in good faith.

14. Data Protection and Privacy

BOK applies the principles of the General Data Protection Regulation (EU) 2016/679 as its baseline global standard for the processing of personal data, including data concerning European donors, and extends equivalent protection to beneficiary, staff and partner data processed in Uganda and Kenya.

- Data concerning disability or health status is treated as special category data and is processed only on an appropriate lawful basis, with heightened confidentiality and security safeguards.
- Data is collected only for specified, legitimate programme, safeguarding, reporting or fundraising purposes, and is not processed in a manner incompatible with those purposes.
- Data collection is proportionate, and retention is limited to what is necessary for the stated purpose.
- Parental or guardian consent is sought for the processing of a child's personal data, including photography and public identification, without prejudice to BOK's independent safeguarding responsibilities.
- Donors and data subjects may contact BOK at admin@barnochkvinnor.org to exercise applicable rights of access, rectification or erasure in relation to their personal data.
- Sensitive disability, health or family information is handled confidentially and shared only for legitimate programme, safeguarding or reporting purposes, including with donors under confidentiality-appropriate reporting arrangements.

15. Partnerships and Due Diligence

- Prospective partners are assessed for their commitment to inclusion, safeguarding and rights as part of BOK's due diligence process.
- Partnership agreements include relevant expectations on disability inclusion, safeguarding and data protection, where appropriate.
- BOK collaborates with local government, health and education authorities, disability organisations, community-based organisations and specialist professionals.
- Partnerships are reviewed periodically to assess quality, safeguarding, inclusion and learning.
- Partners working directly with children must meet BOK's applicable safeguarding expectations as a condition of partnership.

16. Community Engagement and Attitudinal Change

- Awareness activities address stigma, discrimination and harmful beliefs about disability.
- Community leaders, local authorities, teachers, health workers, faith leaders and caregivers are engaged as appropriate.
- Families receive information and referrals that support inclusion and protection.
- Community engagement promotes the rights, dignity and capabilities of persons with disabilities.

17. Monitoring, Evaluation and Learning

Where appropriate and lawful, BOK collects and uses disability-disaggregated data to understand reach, participation and outcomes. Data collection is proportionate, confidential and subject to appropriate consent and data protection safeguards, as described in Section 14.

- Number of children and persons with disabilities reached.
- Age, sex, location and relevant disability information, where appropriate and safely collected.

- Type of intervention or support received, and access to education, therapy, assistive equipment, nutrition, protection or livelihood support.
- Participation and satisfaction of beneficiaries and caregivers.
- Accessibility barriers identified and addressed, and programme outcomes, challenges and lessons learned.

BOK distinguishes between outputs (what was delivered) and outcomes (what changed), recognising that meaningful inclusion requires evidence of participation, access, wellbeing and empowerment rather than beneficiary numbers alone.

18. Accountability, Complaints and Feedback

- Feedback channels are accessible to people with low literacy or limited mobility, so far as practicable.
- Complaints are treated seriously, confidentially and fairly.
- Safeguarding complaints are handled under BOK's Safeguarding Policy and relevant procedures.
- No person suffers retaliation for raising a concern in good faith.
- Complaint trends and feedback are reviewed by the Board to identify improvements.
- Where appropriate, BOK communicates the actions taken in response to recurring concerns to donors and partners.

19. Governance and Responsibilities

- **Board of Directors:** approves this Policy, provides oversight, promotes organisational accountability and ensures adequate resources are allocated to disability inclusion.
- **Founder & President / Senior Leadership:** provides strategic leadership and ensures disability inclusion is reflected in organisational priorities, partnerships and donor engagement.
- **Impact Director / Programme Leadership:** coordinates implementation, develops indicators, oversees monitoring and reporting, and supports programme teams and partners.
- **Staff and Volunteers:** must understand and uphold this Policy, complete relevant induction or training, and report concerns through established channels.
- **Partners:** are expected to uphold disability inclusion, safeguarding and accountability standards agreed with BOK as a condition of partnership.

20. Training and Capacity Building

BOK strengthens staff, volunteer and partner capacity on:

- Disability awareness and rights.
- Safeguarding risks affecting children with disabilities.
- Communication and respectful, dignity-affirming language.
- Identification of accessibility barriers.
- Inclusive programme design and participation.
- Data protection and responsible storytelling.

21. Risk Management

Disability-related risks are considered within BOK's programme and organisational risk management, including risks of exclusion, safeguarding concerns, inaccessible venues, transport barriers, stigma, privacy breaches, inappropriate equipment, inadequate referrals and dependency. Where risks are identified, BOK takes proportionate measures to prevent, reduce or manage them, and documents significant incidents and learning in accordance with its policies.

22. Donor Accountability and Transparency

- Programme budgets identify relevant disability inclusion costs where appropriate.
- Donor restrictions and grant agreements are respected.
- Financial and programme reporting is accurate and supported by appropriate records.
- Beneficiary figures and impact claims are based on available evidence.
- Challenges, delays or significant changes affecting disability-related activities are communicated to donors in accordance with applicable reporting requirements.
- BOK does not knowingly exaggerate impact or use misleading images or narratives to solicit donations, consistent with recognised European fundraising codes of practice.

23. Sustainability and Local Capacity

- Strengthening caregiver knowledge and support networks.
- Working with local leaders and service providers, and developing referral pathways.
- Building partnerships with relevant specialists.
- Promoting community ownership and advocating for inclusion within existing public systems.

24. Review and Continuous Improvement

This Policy is formally reviewed by the Board of Directors at least every two years, or sooner where there is a significant change in BOK's operating context, the applicable legal or regulatory framework, its programme model, or the evidence base for disability inclusion practice.

Feedback from beneficiaries, caregivers, staff, partners and donors may inform revisions. Substantive amendments are approved through BOK's governance procedures and communicated to relevant personnel, partners and donors.

25. Related Policies and Documents

- Barn Och Kvinnor Organisation Constitution
- Safeguarding Policy (2025)
- Partnership Policy (2025)
- Anti-Corruption and Corruption Prevention Policy (2025)
- Operational Policy (2025)
- Relevant donor agreements and programme procedures

26. Reference Frameworks

European and International

- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD, 2006) — ratified by the European Union (2010) and Sweden (2008).
- Charter of Fundamental Rights of the European Union, Articles 21 and 26.
- European Accessibility Act (Directive (EU) 2019/882).
- General Data Protection Regulation (EU) 2016/679.
- Swedish Discrimination Act (SFS 2008:567).
- United Nations Convention on the Rights of the Child (UNCRC, 1989).
- African Charter on the Rights and Welfare of the Child (1990).
- United Nations Sustainable Development Goals — Goals 4, 5, 8, 10 and 16.

National Legislation — Uganda and Kenya

- Persons with Disabilities Act 2020 and National Policy on Disability in Uganda (2006).
- Children Act (Cap 59) (Uganda).
- Persons with Disabilities Act 2003 (Kenya), as amended.

27. Approval and Sign-Off

This Disability Inclusion & Accessibility Policy is adopted as a binding governance document of Barn Och Kvinnor Organisation and is effective from the date of approval below.

Daphne Leeser
Founder & President

Signature:



Date:

2025-05-25

Flavia Kakaire
Co-Founder & Vice President

Signature:



Date:

2025-05-25

Esther Kisembo
Co-Founder & Impact Director

Signature:



Date:

2025-05-25

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