Beyond Recognition: Making Climate Finance Accountable to Persons with Disabilities

A Policy Brief for Climate Fund Boards, Donor Governments and National Climate Finance Leaders



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Summary of the Research Key Findings

Disability inclusive climate finance is both a governance and an accountability concern.

1

Donor requirements are critical to driving inclusion.

Because donor requirements shape inceptives throughout climate finance systems, they play a critical role in determining whether disability inclusion becomes optional practice or standard practice. Making requirements binding at the design and approval stages for ensuring the inclusion of persons with disabilities and their representative organizations in climate financing is essential.

2

For global funds, disability remains largely invisible within climate-finance systems.

None of the global funds reviewed require disability outcome indicators, test disability inclusion capacity during accreditation, or systematically track whether finance reaches persons with disabilities. Disability remains largely treated as a safeguard issue rather than a development outcome. Without disability-disaggregated monitoring and reporting, persons with disabilities remain largely invisible in funding flows, outcomes and accountability systems. The CRPD Article 31 obliges governments to collect data on implementation and Article 33(3) to ensure OPDs and civil society can participate in monitoring. There is very little or no data available on climate finance that is disability inclusive.

3

At national level, the central challenge is not a lack of policy commitments, but the absence of accountability mechanisms that turn policy into delivery and impact.

Across the three countries analysed, none of the five conditions for disability-inclusive climate finance were rated as Required. This means that none of the conditions were embedded in eligibility, approval or reporting requirements in a way that would affect a financing decision.

The problem is institutional priority, plus gaps in disability-specific capability.

4 Governments and climate-finance institutions already use budget tags, markers, assessments and accountability mechanisms for gender. This demonstrates that the administrative machinery needed to operationalise a cross-cutting priority exists. However, these systems require adaptation, disability-specific expertise, OPD partnership, accessible data and adequate resourcing if they are to deliver meaningful disability inclusion.

Capacity gaps exist on both sides of the financing pathway.

5 Fund managers, accredited entities and government institutions may need disability-specific expertise to translate commitments into appraisal criteria, budgets, indicators and accessible delivery arrangements. OPDs may need funded organisational readiness support to meet application and compliance requirements. Addressing only one side will not create an accessible pathway.

No direct pathway to disability-led organisations was found.

6 Across the three countries studied, the research found no evidence that climate finance from the GCF, GEF or Adaptation Fund reached an OPD directly. Where OPDs accessed resources, it was typically through donor-supported intermediary arrangements rather than through climate-finance systems themselves. The absence of direct pathways means that persons with disabilities are often expected to benefit from climate finance without having meaningful control over how it is designed, governed or distributed.

Locally led climate finance is not automatically inclusive climate finance.

7 Devolving resources to local actors does not guarantee that persons with disabilities or OPDs participate in decision-making or control resources. Without deliberate inclusion measures, **local-decision-making structures can reproduce existing social inequalities and exclusion.**

The context

Climate finance is expanding rapidly. New financing commitments, locally led adaptation mechanisms and emerging climate funds create an unprecedented opportunity to ensure that climate action reaches those most affected by climate change. Yet there is little evidence that climate finance is equitably reaching persons with disabilities, or organisations representing persons with disabilities (OPDs). Or that OPDs are meaningfully participating in decisions on how climate resources are allocated.



Why does disability inclusive climate finance matter?

Evidence from the IPCC, the UN Special Rapporteur on Human Rights and Climate Change, and other civil society organisations including CBM Global's own research all point to the fact that persons who already experience social, economic and political inequalities often bear disproportionate climate impacts despite contributing the least to the drivers of climate change.

Persons with disabilities living in countries bearing the brunt of the climate crisis often face disproportionate impacts, not because of impairments or conditions themselves, but because barriers to information, infrastructure, services and decision-making increase exposure to climate risks and limit adaptive capacity.

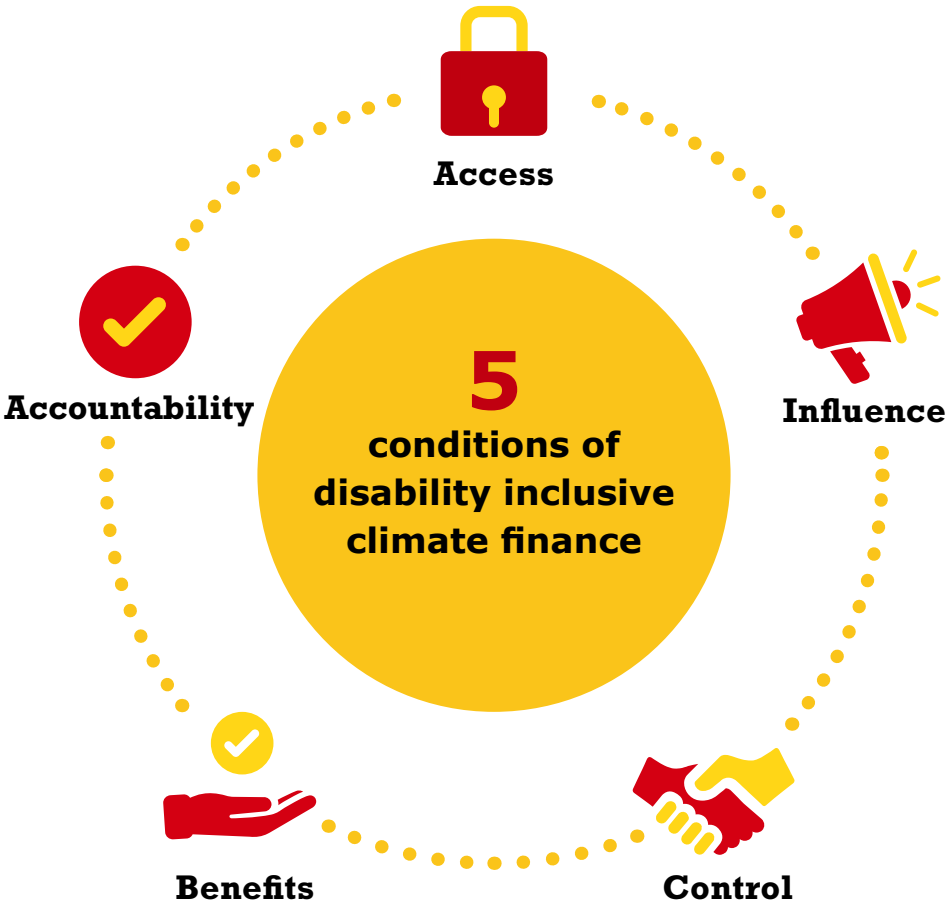
Access to climate finance therefore is essential because communities on the front lines of climate change need resources to adapt, recover and thrive. Persons with disabilities, including women and girls with disabilities and local communities, are rights-holders, climate leaders and agents of change whose knowledge, lived experience and leadership are essential to effective and equitable climate action. But they are often excluded from funding opportunities. Investing in these groups helps ensure climate action is more inclusive, effective and sustainable.

What the research set out to achieve

The research asked a simple question: Where do persons with disabilities and their representative organisations (OPDs) gain or lose access, influence and decision-making power as climate finance moves through systems?

To answer it, a sample of global and national climate funds was assessed. The Global fund assessment looked at how disability was incorporated into fund performance systems. 3 countries, Indonesia, Kenya and Nepal were then assessed against **five conditions of Disability-Inclusive Climate Finance derived from existing legal and policy commitments,** including the Principles for Locally Led Adaptation and the Global Climate Funds' Locally Led Climate Action (LLCA) Framework. These were then cross-referenced with the rights and participation requirements contained in the Convention on the Rights of Persons with Disabilities, particularly Articles 4(3), 11, 31, 32 and 33(3), providing a practical framework for evaluating whether climate finance is truly inclusive.

Building on these pre-existing commitments, climate finance for the purposes of the report was defined as disability-inclusive when **persons with disabilities and their representative organisations could access finance, influence decisions about it, control a share of its resources, benefit from its outcomes, and hold institutions accountable for each.**



What the research found

Disability inclusive approaches become least visible precisely where power over resources is exercised in financing decisions, resource allocation and results monitoring.

The research drew on analysis of the Green Climate Fund (GCF), Global Environment Facility (GEF) and Adaptation Fund (AF), together with analysis of national and local climate action case studies in Kenya, Indonesia and Nepal. The evidence synthesised in this policy brief highlights similar trends across the global funds assessed and how they include disability inclusion in their systems and how that flows to national level. At national level it highlights how the funds fared against the five disability inclusive conditions. The full research report which was carried out for us by MicroSave Consulting, can be found here.

Findings on Global Funds

All three funds primarily address disability related considerations through safeguards and risk-management arrangements rather than results and performance systems. None of the three funds has a disability-specific results indicator or tests disability-inclusion capacity as a distinct accreditation criterion.

Each fund reaches communities only through a national gatekeeper and an accredited entity. This is how the climate finance system operates. The GCF and AF allow direct access through accredited or implementing entities, while the GEF works through GEF agencies. However, its Small Grants Programme (SGP) provides the shortest route from any of the three funds to reach community organisations.

Recognition also varies across the funds. The GEF and AF explicitly refer to persons with disabilities in their safeguards, while the GCF recognises them through the International Finance Corporation (IFC) Performance Standards, which it has adopted as its interim safeguards.

Findings at National level

Exclusion occurs at different points in different systems.

Across the three countries, Indonesia, Kenya and Nepal, disability is most visible in policies, NDCs, and safeguards. It is less consistently reflected in the rules applied, for example, through proposal approval by ministries, partner selection by fund managers, and budget decisions by subnational governments. OPDs may be consulted, but consultation does not necessarily translate into influence, decision-making authority or control over resources.

Level	Indonesia	Nepal	Kenya
Macro level	Ministries and funds	Ministries	Treasury and national agencies
↓ **Macro-to-meso link**	**Blocked.** Capability requirements are assessed at selection, while readiness support arrives later.	**Connected.** Ministries check the fund size and procedure, but not disability.	**Connected.** Counties get a formal climate-budget transfer.
↓ **Meso level**	Fund managers and accredited entities	Accredited entities	Counties
↓ **Meso-to-micro link**	**Weak.** No qualified local partner at this scale.	**Weak.** Inclusion is left to each entity's discretion.	**Weak.** No route from county funds to OPDs.
↓ **Micro level**	OPDs and CSOs	Local plans and OPDs	Wards and OPDs

Breaks:

- **Indonesia:** Macro-to-meso
- **Nepal:** Within meso
- **Kenya:** Meso-to-micro



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In each of the countries, the chain breaks at different points:



Indonesia: access breaks down because there is fiduciary, compliance, and funding-threshold requirements that OPDs cannot meet. Because these capabilities are generally required at the point of selection, while readiness support is limited or provided only after selection, many organizations are excluded before they can become viable partners.



Nepal: disability is recognised in policy, but whether OPDs can access climate finance depends on the discretion of the intermediaries.



Kenya: persons with disabilities and OPDs are not systematically represented in the ward and county structures that set priorities, allocate resources and monitor results, and no mechanism moves finance from the county to OPDs.

In each context, exclusion occurs where policy commitments fail to become binding requirements for approval, allocation or reporting.

What needs to change

We do not need parallel or new systems to be developed for disability inclusion.

The research evidence points towards a practical reform agenda rather than the creation of new systems. Across Nepal, Indonesia and Kenya, the evidence points to several practices that could be adapted to strengthen disability-inclusive climate finance. These are not presented as complete models, but as current finance, governance and delivery features with potential transferability to disability inclusion. A consistent pattern: disability inclusion advances when it is built into the administrative and financial systems that already govern climate investment, rather than added as a separate layer.

Donors, global funds, accredited entities and intermediaries, and national governments all have a key role to play to ensure better governance and accountability that ensure that climate finance reaches communities facing the greatest barriers to participation, resilience and access to resources. This can be achieved through practical reforms to existing systems.

Rules and capability must change together. Binding requirements create the incentive for action, but institutions also need the expertise, partnerships, data and resources to implement them. Technical support may therefore be needed to adapt appraisal and tracking systems, develop costed inclusion plans, engage OPDs meaningfully and monitor disability-related outcomes. At the same time, OPDs require funded readiness support before selection, combined with proportionate access requirements and paid roles as technical, delivery and accountability partners.

Our Recommendations

For Donors

Use your funding and governance bodies to make disability inclusion measurable, costed and compulsory in climate finance.

- Make disability requirements binding at design and approval stages, establish country-level disability reporting, and define measurable criteria for "performing effectively" on inclusion.
- Fund readiness support before partner selection and reform the requirements that exclude OPDs. Resource OPDs as programme partners, technical contributors and accountability actors, and combine organisational support with proportionate due diligence, accessible application processes and realistic funding thresholds. Pay for OPD readiness support, name OPDs in programme consortia, budget for organisational capacity investments alongside programme delivery, and restore sub-grants to local organisations, including OPDs, as soon as conditions allow.
- Link disability-sector and climate funding and funding streams, and establish accessibility as a standard eligible cost, covering interpretation, transport, accessible venues, personal assistance – so that the cost of meaningful participation does not fall on participants.

For Global Funds

Put disability into the rules: require disability-disaggregated indicators, costed inclusion plans, OPD participation and disability capacity in accreditation.

- Embed disability as a performance indicator, not a safeguard
- Require disability-differentiated analysis at concept and full-proposal stages, covering access barriers, additional disability-related costs, plus accessibility and reasonable accommodation requirements.
- Require accredited entities to demonstrate, through a costed disability inclusion plan, how they will access disability expertise, involve OPDs, identify and budget for accessibility requirements, and monitor disability-related participation and outcomes.
- Require meaningful OPD participation in project design and governance. Introduce proportionate access pathways with simplified windows for small locally led actors and reimbursable application costs.

For Accredited Entities and Intermediaries

Make disability inclusion part of how climate finance is designed, accessed, delivered and measured, with accessible and proportionate routes for OPDs to participate and receive funding.

- Convert references to disability inclusion into binding, scored, and reported requirements.
- Use the projects now being shaped to write disability inclusion plans in at design
- Formalise OPDs as implementing and knowledge partners across the programme cycle, not only as consultees or beneficiary representatives at the end of it. Apply disability-inclusive sub-granting criteria and proportionate due diligence paired with organisational support, so that readiness is built before selection.
- Ensure reliable access to disability-specific technical expertise and assign clear responsibility for disability inclusion, supported by an adequate budget for accessibility and reasonable accommodation. This expertise may sit within the institution, be provided through an OPD or specialist partner, or be commissioned for particular proposals and programmes, but it should not be assumed to be covered automatically by a broad gender or social-inclusion role.

For National and Local Governments

Count people with disabilities, give OPDs a formal seat in climate-finance decisions, and create direct routes for resources to reach them.

- Extend existing gender tracking tools to carry disability across all three countries.
- Institutionalise the principals of participation/ ‘nothing about us without us” by ensuring OPDs have formal, resources, and ongoing participation in climate-finance governance and decision-making .
- Build local disability data from the Census and OPD mapping.
- Ring-fence a budget share and make accessibility an eligible cost at local level.

For OPDs and Civil Society

Close the gap between the climate and disability movements by making OPDs co-designers, partners, grant recipients and accountability actors.

- Build funding readiness as a precondition for direct climate access, covering financial governance, proposal writing and fund management.
- Claim formal standing roles and use OPD-held data as institutional leverage.
- Enter climate and environmental networks before programme proposals are designed, not after.
- Systematically document disability-led climate action to shift institutional perceptions of persons with disabilities from beneficiaries of climate action to leaders, partners and rights-holders within climate governance.