

Evaluation Report

Evaluation of UNICEF's Reasonable Accommodation Fund

Evaluation Office
January 2024



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Evaluation of UNICEF's Reasonable Accommodation Fund Evaluation Report

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New York, New York 10017

January 2024

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Please cite the work as follows: UNICEF (2024), Evaluation of UNICEF's Reasonable Accommodation Fund. UNICEF Evaluation Office, New York.

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Preface

UNICEF works to promote the rights and well-being of every child, everywhere. Among the most marginalized children UNICEF advocates for are the 240 million children with disabilities, who represent some 10 per cent of the world's children. Arguably no other organization knows as much about the effect of disability on a child's future – or has documented these effects as rigorously. Children with disabilities are less likely to have access to pre-school, primary school, secondary- or upper-secondary education, and this likelihood declines significantly further when combined with factors such as poverty, female gender or rural location.

What does any of this have to do with an internal evaluation of how UNICEF accommodates its own employees with disabilities – and more specifically, how the organization provides reasonable accommodation to those staff members who request it? Put simply: everything.

Any organization of value and credibility must lead by example. It must be UNICEF's clear ambition and obligation to actively model the inclusion of persons with disabilities in order to credibly exemplify its ideals to the children it serves. However, UNICEF's own disability demographics still fall short: the results of its most recent Global Staff Survey, conducted in 2022, indicated that out of 14,747 respondents, only 308 – or 2.1 per cent – self-identified as persons with disabilities. A further 3.8 per cent said they preferred not to say whether they were a person with disability, perhaps because they feared the consequences of self-identifying.

UNICEF is aware of these challenges and has made the inclusion of persons with disabilities a priority both for its programmatic work and within the organization more broadly. This is demonstrated by its commitments to disability inclusion in the current Strategic Plan 2022-2025 and by the development of its first ever Disability Inclusion Policy and Strategy (DIPAS) 2022-2030. As one of its benchmarks, the DIPAS calls for UNICEF to gradually increase the number of employees with disabilities across all offices by at least 2 per cent by 2025, with the aim of reaching 7 per cent by 2030.

Reasonable accommodation is a key factor in achieving disability inclusion, playing a vital role in levelling the playing field for staff with disabilities. At UNICEF, this function is carried out by the organization's Reasonable Accommodation Fund. UNICEF's Culture and Diversity team, which manages the Fund, requested this evaluation to inform the Fund's future design and approach. The evaluation concludes that the Fund has been effective in providing reasonable accommodation, that it contributes significantly to an equitable and enabling work environment, and that its approach aligns with international standards. The evaluation also identifies opportunities for improvement, such as raising staff awareness of disability and reasonable accommodation, improving the related application and procurement processes, and reviewing the composition of the Fund's Advisory Committee. The evaluation also suggests considering another model beyond a fund to provide reasonable accommodation in order to make the approach more holistic.

I would like to commend the Culture and Diversity team for requesting this evaluation as part of its commitment to the continual process of learning and improving and to thank them for their active and constructive interaction with the Evaluation Office throughout the process. As we look forward to the management response to this evaluation, I trust that its findings and recommendations will make a valuable contribution to strengthening the crucial role of reasonable accommodation and, more broadly, to helping UNICEF fulfil its commitment to disability inclusion and leading by example.



Robert McCouch
Director of Evaluation, UNICEF

Acknowledgements

This evaluation has been made possible by the collaboration of a number of stakeholders who have generously given of their time, knowledge and experience. The insights provided by UNICEF colleagues, representatives of other United Nations organizations, and external experts were invaluable and contributed to the quality and usefulness of the evaluation.

The evaluation was commissioned by the UNICEF Evaluation Office and managed by Simon Bettighofer, with the support of Xin Xin Yang, Sergio Riaga, and oversight by Erica Mattellone. We would like to thank the team of independent external experts who carried out this evaluation and who had to face many challenges along the way: Amy Farkas Karageorgos, who acted as evaluation expert, and Ilene Zeitzer, who served as technical advisor. Our thanks also go to the focal points from UNICEF's Culture and Diversity team, Sreerupa Mitra and Victor Arita, for their consistently constructive and dedicated support to this evaluation.

We would also like to thank the members of the Evaluation Reference Group for their unwavering commitment and invaluable input throughout the evaluation process: Adrian Shikwe (UNICEF), Alberto Vásquez Encalada (Center for Inclusive Policy, CIP), Alexandre Cote (UNICEF), Anna Burlyayeva (UNICEF), Catalina Devandas Aguilar (Disability Rights Fund), Claudia Cappa (UNICEF), Facundo Chavez Penillas (Office of the High Commissioner for Human Rights, OHCHR), Fernando Botelho (UNICEF), Kristen Elsby (UNICEF), Lemuel Fyodor Villamar (UNICEF), Nora Shabani (UNICEF), Vladimir Cuk (International Disability Alliance), Yetneberesh Nigussie Molla (UNICEF), Zarqaa Chohan (UNICEF), and Zoe Elizabeth Hua Eng Gan (UNICEF).

Special thanks go to Shirin Kiani and Marcos Mendez Sanguos, who previously worked with UNICEF's Reasonable Accommodation Fund and who provided extensive inputs to the evaluation team.

We are also grateful to the external technical experts, researchers and representatives of organizations of persons with disabilities, the Committee on the Rights of Persons with Disabilities (CRPD) and the private sector who provided input to this evaluation. They represented the International Disability Alliance, Beyond Impact, Business Disability International, Disability:IN, Disability Rights Fund, Center for Inclusive Policy, Purple Space, Cornell University, Lakeshore Foundation, Leeds University, and Trinity College London. From the private sector, the evaluation is grateful for the insights provided by AT&T, Expedia, GSK, Microsoft, Salesforce, TCS, and UnitedHealth Group.

A heartfelt thank you goes to the dozens of UNICEF employees with disabilities, including international professionals, national officers, general service staff, UN Volunteers and consultants from headquarters, regional and country offices, who shared their personal experiences. Without their willingness to share their stories and make suggestions for improving the process, this evaluation would be severely limited in its findings and impact.

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Acronyms and abbreviations

ADA	Americans with Disabilities Act
CART	Communication Access Realtime Translation
CRPD	Convention on the Rights of Persons with Disabilities
CSO	Civil Society Organization
DCO	Development Coordination Office
DEI	Diversity, Equity and Inclusion
DFAM	Division of Financial and Administrative Management
DHR	Division of Human Resources
DIPAS	Disability Inclusion Policy and Strategy
EEOC	Equal Employment Opportunity Commission
EFAAT	Environmental Footprint and Accessibility Assessment Tool
ERG	Employee Resource Group
EU	European Union
FWA	Flexible Working Arrangement
GEROS	Global Evaluation Reports Oversight System
GMT	Global Management Team
GrAF	Greening and Accessibility Fund
GSS	Global Staff Survey
HQNY	Headquarters in New York
HR	Human Resources
ICT	Information and communication technology
ILO	International Labour Organization
IOM	International Organization for Migration
JAN	Job Accommodation Network
JAWS	Job Access With Speech
JPO	Junior Professional Officer
LBG	Lloyds Banking Group
OECD	Organisation for Economic Cooperation and Development
OED	Office of the Executive Director
OHCHR	Office of the High Commissioner for Human Rights
OPD	Organizations of Persons with Disabilities
PA	Personal Assistant/Personal Attendant
RA	Reasonable Accommodation
SDGs	Sustainable Development Goals
UN	United Nations
UNDIS	United Nations Disability Inclusion Strategy
UNDP	United Nations Development Programme
UNDS	United Nations Development System
UNEG	United Nations Evaluation Group
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNV	United Nations Volunteers
WFP	World Food Programme

Glossary

To facilitate the reading of this document, this glossary explains some of the key concepts related to reasonable accommodation. The majority of these definitions are based on the [Convention on the Rights of Persons with Disabilities](#) (CRPD) and the UNICEF Glossary of Terms related to Diversity, Equity and Inclusion.

Persons with Disabilities

According to the CRPD, persons with disabilities include those who have long-term physical, mental, intellectual, or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis.¹

Convention on the Rights of Persons with Disabilities

The CRPD is an international human rights treaty of the United Nations intended to promote and protect the rights and dignity of persons with disabilities. It is the first legally binding international instrument requiring states that have ratified it to pay specific attention to ensuring that persons with disabilities have access to the same rights and opportunities as everybody else. It covers many areas where obstacles can arise, such as discriminatory hiring practices, or physical access to buildings or access to information.² The CRPD is based on a human rights-based approach with a goal towards promoting full inclusion of persons with disabilities in all aspects of life. As of April 2022, 186³ countries have ratified the CRPD.

Models of Disability

The medical, social and human rights models of disability are contrasting perspectives used to understand and approach disability. They offer different ways of conceptualizing the causes of disability and how society should respond to it.⁴

Medical Model: The medical model views disability primarily as a result of an individual's physical or cognitive impairments or medical conditions. It places the emphasis on the person's limitations, deficits and medical needs. In this model, the focus is on diagnosing, treating and rehabilitating the individual to minimize the impact of their disability on their life.

Social Model: The social model of disability shifts the focus from the individual's impairments to the barriers and attitudes present in society that create disability. It recognizes that disability is not solely a result of an individual's physical or cognitive differences but is also influenced by societal norms, structures and attitudes.

Human Rights Model: The human rights model takes disability a step further by framing it as a matter of equal rights and social justice. It emphasizes that disabled individuals have the same inherent rights as everyone else and that they should not be excluded, discriminated against, or marginalized due to their disabilities.

In recent years, there has been a significant shift towards adopting the social and human rights models of disability, as they promote inclusivity, empowerment and a focus on dismantling systemic barriers. These models challenge traditional perspectives that often treated disability as solely a medical issue and highlight the importance of creating a more inclusive and equitable society for all.

¹ CRPD, [Article 1 – Purpose](#)

² WHO (2020), [Disability: The Convention on the Rights of Persons with Disabilities](#)

³ This includes 185 countries that have ratified the CRPD and the European Union.

⁴ Lisa Waddington and Mark Priestley (2020), [A human rights approach to disability assessment](#)

Discrimination on the basis of disability

Under the CRPD, discrimination means any distinction, exclusion or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. It includes all forms of discrimination, including denial of reasonable accommodation.

Reasonable Accommodation

Under the CRPD, reasonable accommodation means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.

The United States was the first country to use the term Reasonable Accommodation.⁵ The Equal Employment Opportunity Commission (EEOC) in the United States under the General Principles section of the EEOC document defines reasonableness as:

“A modification or adjustment is ‘reasonable’ if it ‘seems reasonable on its face, i.e., ordinarily or in the run of cases;’ this means it is ‘reasonable’ if it appears to be ‘feasible’ or ‘plausible.’ An accommodation also must be effective in meeting the needs of the individual. In the context of job performance, this means that a reasonable accommodation enables the individual to perform the essential functions of the position. Similarly, a reasonable accommodation enables an applicant with a disability to have an equal opportunity to participate in the application process and to be considered for a job. Finally, a reasonable accommodation allows an employee with a disability an equal opportunity to enjoy the benefits and privileges of employment that employees without disabilities enjoy.”⁶

Undue burden/hardship

Undue burden, or undue hardship, as it is called in some national legislation, means significant difficulty or expense and focuses on the resources and circumstances of the particular employer in relationship to the cost or difficulty of providing a specific accommodation. Undue hardship refers not only to financial difficulty, but to reasonable accommodations that are unduly extensive, substantial or disruptive, or those that would fundamentally alter the nature or operation of the business/organization. An employer must assess on a case-by-case basis whether a particular reasonable accommodation would cause undue hardship. An employer is generally not required to make reasonable accommodations that would constitute an undue hardship. At the same time, however, the burden of proof is also on the employer to demonstrate that an adjustment would constitute an undue hardship.⁷

⁵ The concept of reasonable accommodation was first applied to the disability context in the United States Rehabilitation Act of 1973.

⁶ See [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#). For a deeper analysis of what the EEOC means, refer to the [commentary from Matthew McCord](#), Senior Consultant of the JAN Network

⁷ U.S. Equal Employment Opportunity Commission (2002), [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#)

EXECUTIVE SUMMARY

Introduction

Persons with disabilities often face significant difficulties in the workplace. They are only half as likely to be employed as persons without disabilities⁸ and workplace environments are often not tailored to their needs and requirements, presenting barriers to their equal participation.

UNICEF has made the inclusion of persons with disabilities a priority. The organization's Reasonable Accommodation Fund (hereafter referred to as 'the Fund' or 'RA Fund') plays a central role in this regard. The Fund is administered through UNICEF's Division of Human Resources (DHR) and its request and decision-making process is managed by the organization's Culture and Diversity team in the Office of the Executive Director (OED).⁹

UNICEF's Culture and Diversity team, which manages the Fund, requested an evaluation to inform the Fund's future design and approach. This document presents the results of that evaluation, which was commissioned by the UNICEF Evaluation Office and carried out by a team of two external experts between January and November 2023.

The purpose of this evaluation was to assess if the Fund meets the needs and expectations of all UNICEF personnel that require its support, while being in line with the Convention on the Rights of Persons with Disabilities (CRPD) and the UN Disability Inclusion Strategy (UNDIS). The evaluation assessed the extent to which the Fund complies with relevant guidelines and good and proven practices; its relevance within the organization and coherence with other related tools and policies; whether it is clearly and consistently organized and communicated; and what its main achievements have been to date.

The evaluation was intended to determine the extent to which the current model is suitable to meet objectives and requirements set out in UNICEF's Disability Inclusion Policy and Strategy (DIPAS) 2022-2030 and to inform the future design and approach of the RA Fund and of related elements in its broader context. In this way, the evaluation aimed to contribute to the successful inclusion of persons with disabilities in UNICEF, and to provide an evidence-based contribution to the current UN-wide efforts and discussions aimed at strengthening the inclusion of persons with disabilities, including the provision of reasonable accommodation.

Scope and methodology

The scope of the evaluation included all aspects related to UNICEF's RA Fund from its inception in 2011 to 2022, with a particular focus on 2020 to 2022, when there was an increase in funding, awareness and utilization, and a more structured application process. The RA Fund covers only accommodations that have a cost (e.g., purchasing software or hiring a personal assistant). Accommodations that do not have a cost (e.g., changes to working hours or location) were considered in this evaluation in terms of how coherent and complementary the RA Fund is with other related tools and policies.

⁸ ILO (2022), [New ILO Database highlights labour market challenges of persons with disabilities](#)

⁹ Requests for accommodations under US\$2,500 are reviewed by the Culture and Diversity team, whereas accommodations over US\$2,500 are reviewed by a Reasonable Accommodation Committee.

The methodology for this evaluation was based on the use of mixed methods for data collection and analysis. Data was collected through 96 key informant interviews; an online survey for UNICEF personnel with disabilities, which received 142 responses; and a document and literature review. Data sources were analysed and triangulated, leading to the distillation of findings, conclusions, and recommendations, which were discussed in validation workshops and commented on by key stakeholders and experts who formed the Evaluation Reference Group.

The approach relied on an analytical framework that encompassed three perspectives: The Fund was assessed (i) in the sense of a *policy* designed and offered by the organization; (ii) regarding the implementation of the related *processes*; and (iii) in terms of its effectiveness in achieving *results*, both from the perspective of the organization as a whole and, most importantly, from the perspective of its actual and potential future users. The evaluation was guided by a human rights-based and gender-sensitive approach and by the principles of accessibility, transparency, meaningful participation and ownership.

Key Findings

Alignment with relevant guidelines and good and proven practices

The current RA Fund approach is in line with the guiding principles of the CRPD and with the objectives outlined in the UNDIS. UNICEF is recognized as one of the more advanced UN organizations in terms of experience and expertise in the area of reasonable accommodation.

Over time, the RA Fund has adopted several good and proven practices from the private and public sectors, notably: a centralized fund; a self-referral pathway (which means that individuals can make their own request without a sign-off needed by their supervisor); and an online application form. However, there are other important, well-documented practices that have yet to be adopted, such as a centralized one-stop shop for RA support; a standard form for attestation/verification of disability when disability is not obvious; continuous follow up with requesters and on the fulfilment of the accommodation; an ICT catalogue for fast-track procurement and conducting regular communication campaigns and ongoing internal communication messages to change attitudes around disability inclusion and disclosure.

Relevance and coherence with other related tools and policies

The RA Fund complements other internal funds and accessibility mechanisms (such as the Greening and Accessibility Fund, the Global Accessibility Helpdesk, and Flexible Work Arrangements), creating a more comprehensive approach to promoting an inclusive environment for persons with disabilities. Nevertheless, coherence among these systems is unclear and should be streamlined.

While the scope and timeline for this evaluation did not allow for an in-depth analysis of the broader policy context, it emerged that there does not appear to be a link between the responsibilities of the RA Fund, Occupational Health and Safety, and UN Medical, which determines who is fit for service. According to the experience of some interviewees, this lack of coordination has led to potential violations of reasonable accommodation when an employee with an existing or newly acquired disability was denied a post, without any consideration of whether a reasonable accommodation would have allowed them to do the essential functions of the job.

Quality of operationalization and internal awareness

Information about the RA Fund is presented consistently in key internal documents that are fairly easy to find. However, the understanding of disability and reasonable accommodation, including what it is and who can request it, varies widely across the organization. There have been ongoing efforts and targeted activities (such as SharePoint sites, webinars and training) led by the Division of Human Resources and the Culture and Diversity team, to raise internal awareness about the Fund, but overall there is still low awareness of the Fund across the organization, including a knowledge gap among managers and operations focal points, which impacts the provision of accommodations. In addition, processes related to the recruitment and onboarding for new employees appear to provide limited or inconsistent information on reasonable accommodation, particularly for consultants and interns.

The application and decision-making processes are mostly perceived as clear and transparent. There is an online form and guidance that discusses how to apply and how decisions are made. At the same time, there are some issues to be addressed, mainly related to elements of the application form (e.g., some questions are difficult for applicants to complete) and the information provided to applicants once a decision has been made (e.g., written notices do not include details on the time period a staff member has to raise and issue or file a complaint if they do not agree with the decision made).

Results achieved

The Fund has been effective in providing both low- and high-cost accommodations, regardless of employee category or geographic region. Overall, the users consulted felt that the Fund was helpful and that its administrators were supportive. The time taken by the RA Fund to process requests is, for the most part, in line with the international best practice standard of 20 days or less. Yet, in approximately one-quarter of all RA requests processed, it took considerably longer to procure and have the accommodation in place.

Once a request is approved, there appears to be a lack of consistency in how an accommodation is provided or procured, which has resulted in cases where requestors have been left to navigate the system with little to no support. In addition, at least six staff interviewed reported they were required to provide medical proof or details of their disability at the local office level in order to receive the requested accommodation. They reported that their personal and medical information had been emailed to other colleagues in the office during the procurement process without their permission, which is against employees' right to privacy and a breach of confidentiality. In line with this, the main concerns shared by users of the Fund were a lack of understanding of RA among colleagues outside the Fund's administration, leading to inappropriate disclosure of personal and medical information. Those staff were also concerned about the lack of a clearly articulated complaint process.¹⁰

Employees with more apparent disabilities made more requests to the RA Fund, which is expected based on the types of impairments that are more visible and the types of accommodations they may request. At the same time, employees who could potentially benefit from RA with or without a cost, and who chose not to request accommodation(s), did so because they were unsure whether they qualified. Other employees simply did not know what they needed in terms of RA.

¹⁰ Formally UNICEF has a 'complaint mechanism' that exists for any decision in the organization through what is called a 'management evaluation.'. However, interviewees were not aware of this. A simpler and dedicated process for appealing RA requests would be appropriate.

Despite the existence of a long-term agreement with a company to provide assistive technology to staff with disabilities and a catalogue of options, there is very little awareness of this beyond UNICEF's Supply Division. UNICEF does not have a standard operating procedure for the procurement of assistive technology, including for subscription-based assistive software.

Suitability to meet related objectives and requirements

Several key elements of the RA Fund model and within UNICEF systems and procedures are in place to foster a more inclusive work environment. At the same time, there are factors that can hinder the effectiveness or efficiency of the provision of RA and thus the achievement of the organization's goal of employing more persons with disabilities. These factors include:

- Limited awareness of the provision of RA among both staff in general and staff with disabilities
- Information on who is eligible for RA is vague (i.e., current internal guidance does not clearly specify what constitutes a long-term disability)
- Lack of staff in each office who are trained on RA and could therefore ensure a smooth process (e.g., operations personnel, IT)
- Lack of a comprehensive set of monitoring and evaluation tools and practices for continuous learning and refinement (e.g., user satisfaction surveys)
- A budget that is set yearly and does not have a clearly defined mechanism to increase the amount if demand exceeds the budget available
- Current culture in the organization has led to some employees with disabilities not feeling comfortable disclosing their disability status and therefore not applying for RA.

Disability Connect, UNICEF's Global Network of Employees with Disabilities, is a useful platform for peer-to-peer support and information sharing on RA. However, its ability to play a supporting role is hampered by a lack of resources to ensure that its communications and activities are accessible.

Conclusions

The evaluation found that the provision of reasonable accommodation is essential to enable persons with disabilities to apply for jobs and perform essential job functions. With the RA Fund, UNICEF has made significant efforts to provide costed reasonable accommodations to employees with disabilities. The Fund has been effective in the provision of RA, contributing significantly to an equitable and enabling work environment. Its approach aligns with international standards and incorporates some effective practices while having potential to adopt further beneficial practices.

"Essentially reasonable accommodation allows me to approach work in a way that works for me."

UNICEF Employee with Disability

The Fund complements other internal funds and accessibility mechanisms. At the same time, UNICEF would benefit from an in-depth study of how RA relates to occupational health and safety and UN Medical when it comes to the hiring, support and retention of persons with various types of health conditions, whether temporary, episodic or long-term impairments.

Improvements are needed in staff awareness of disability, RA in general, and how to apply for it. While there is a well-established process to apply for RA, inconsistencies in the quality of requesters' experience after approval indicate that clearer procedures and a written operations

manual are needed, particularly for procurement at the country and regional levels. Some of the questions on the online RA application form should be revised to make them clearer for users.

While the current RA Fund budget is sufficient to cover the present-day requests, the existing amount and budgeting approach may not be sufficient to meet the DIPAS goals. To continue to meet the needs of staff with disabilities and the goal to hire more persons with disabilities, UNICEF also needs to ensure the right composition of the RA Advisory Committee. Disability Connect can continue to be a helpful platform for peer-to-peer support and information sharing about RA but requires the right resources to ensure accessible communications.

While the scope of the evaluation focused on the Fund, which handles accommodations with a cost, research shows that the majority of accommodations do not have a cost. A comprehensive approach to RA would therefore require a holistic approach that considers accommodations both with and without costs, in line with the practices of progressive organizations.

Despite the Fund's achievements, the evaluation concludes that calling it an RA Fund sends the wrong message. As a "fund," it denotes a finite amount of money and does not convey the organization's interest and obligation to provide every employee with disability what they need to do their job. Moving to a centralized accommodation programme or 'one-stop shop' model would enable UNICEF to ensure every employee with disability has what they need to perform the essential functions of their job to the same extent as their non-disabled peers. A one-stop shop would issue 'accommodation passports' for all types of accommodations, including those with and without a cost.

Recommendations

The evaluation makes a total of eight recommendations, which relate both to the Fund and to the wider context. These recommendations are summarized below in order of priority, while further details, including specific actions proposed, are provided in the [relevant section of the report](#).

Recommendation 1: UNICEF should **transition from an RA Fund to an RA Office**, with accountability to senior leadership and dedicated staff to manage it. The RA Office should act as a 'one-stop shop' (single point of entry for the provision of services), using a case management approach, with the authority to issue 'accommodation passports' that would facilitate and advise on RA for employees with disabilities, while ensuring that personal information is stored appropriately, and key communication is in the applicant's preferred UN language, if requested.

Priority/timeframe: Very high/high, to be addressed within 6-12 months

Cost implications: Largely neutral, but additional financial and human resources may be required for individual measures and the staffing of the future office

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 2: To **ensure that employees and applicants are aware of and can access reasonable accommodation**, UNICEF should strengthen its internal and external measures to effectively communicate the organization's commitment to provide RA and how to request it.

Priority/timeframe: High, to be addressed within six months and ongoing

Cost implications: Neutral

Responsible units: Senior leadership/Office of the Executive Director, Culture and Diversity team, Division of Human Resources

Recommendation 3: UNICEF should **strengthen organization-wide strategies, training, and communication activities** towards achieving a truly disability-inclusive and accessible workplace. This is necessary to support the provision of RA and to work towards the goals of the DIPAS, particularly the target of 7 per cent of employees being persons with disabilities by 2030.

Priority/timeframe: High, to be addressed within 6-12 months and ongoing

Cost implications: Partly neutral, partly financial resources may be required

Responsible units: Culture and Diversity team, Division of Human Resources, Division of Global Communication & Advocacy

Recommendation 4: UNICEF should continue to **approve all RA requests that meet the criteria and ensure their consistent and effective provision** across the organization in line with international best practices, while addressing existing issues in RA guidance and procedures.

Priority/timeframe: Very high, to be addressed within 6-12 months

Cost implications: Largely neutral, possibly cost-saving for the Fund

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 5: To **ensure quality assurance and user satisfaction**, UNICEF's RA Fund/Office should use an appropriate set of tools and practices to monitor and evaluate the provision of RA to employees and applicants across the organization.

Priority/timeframe: Very high/high, to be addressed within 6-12 months

Cost implications: Neutral if measures are carried out by internal staff

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 6: UNICEF should **regularly review RA expenditure and recruitment activities** (i.e., hiring persons with disabilities and any targeted recruitment) to ensure that additional funds can be quickly allocated to RA as needed to support personnel with disabilities.

Priority/timeframe: High, to be addressed within 6-12 months and ongoing

Cost implications: Neutral, additional financial resources may be required if an increase in budget is necessary

Responsible unit: Culture and Diversity team, Division of Human Resources

Recommendation 7: UNICEF should **review the composition of the RA Committee**, which decides on requests over US\$2,500, to ensure broad representation and appropriate expertise and avoid potential conflicts of interest if committee members are also in positions to advise personnel with disabilities, for example through Disability Connect.

Priority/timeframe: High, to be addressed within six months

Cost implications: Neutral

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 8: UNICEF should continue to **share knowledge and experience on reasonable accommodation with other UN organizations** to promote collaboration and learning in this area and the effective inclusion and non-discrimination of persons with disabilities.

Priority/timeframe: High, to be addressed within six months

Cost implications: Neutral

Responsible units: Deputy Executive Director Management, Culture and Diversity team

1. INTRODUCTION

Over the past 15 years, UNICEF has strengthened its efforts to promote the inclusion of persons with disabilities in both programmes and operations. This is evidenced with the adoption of the Disability Inclusion Policy and Strategy (DIPAS). The organization's Reasonable Accommodation Fund (hereafter referred to as 'the Fund' or 'RA Fund') plays a central role in this context. The RA Fund is just one component of UNICEF's efforts to advance the inclusion of employees with disabilities within the organization and to provide accommodations to remove workplace barriers that prevent applicants and employees with disabilities from enjoying equal employment opportunities.

UNICEF's Culture and Diversity team, which is managing the Fund, has requested an evaluation to inform its future design and approach. UNICEF's Evaluation Office commissioned this independent evaluation, which covers the period from the Fund's inception in 2011 to 2022. This evaluation has a particular emphasis on the period from 2020 to 2022 when there was an increase in both funding and communication activities to promote the Fund's use more widely across the organization, as well as a more sophisticated mechanism to track its use.

The purpose of the evaluation was to determine if the RA Fund meets the needs and expectations of all of UNICEF's personnel who require its support, while being in line with the Convention on the Rights of Persons with Disabilities (CRPD)¹¹ and relevant UN-specific guidelines (e.g., UN Disability Inclusion Strategy). It also intended to inform the future design and approach of the RA Fund in line with the organizational goals addressing disability inclusion and, more broadly, pertaining to diversity, equity, and inclusion (DEI), including the DIPAS.

The evaluation was implemented by a team of two independent external experts: an evaluation expert and a technical advisor. Focal points from UNICEF's Culture and Diversity team served as points of contact for coordinating matters related to the implementation of the evaluation, such as providing access to information and key informants and supporting the coordination of data collection. An Evaluation Reference Group, which consisted of UNICEF colleagues from all organizational levels and external experts, supported the evaluation in an advisory capacity, providing feedback and technical input throughout the process.

This report is organized in seven sections. Following this introduction, Section 2 provides background and key elements of the RA Fund. Section 3 presents the purpose, objectives and scope of the evaluation as well as the questions to be answered. Section 4 outlines the methodology used. Section 5 provides the findings for each of the main evaluation questions. Section 6 presents the conclusions derived on the basis of the findings. Section 7 contains the recommendations of this evaluation. This report is also supplemented by six annexes with supporting documentation and material, which are included in a separate document.

¹¹ UN (2006), [Convention on the Rights of Persons with Disabilities](#)

2. BACKGROUND

Diversity, equity and inclusion (DEI) is an umbrella term that refers to values, policies or practices that promote the representation, participation and support of people from diverse backgrounds and identities. Diversity, equity and inclusion are pillars of a successful, modern workplace. This claim is supported by broad evidence: According to a 2019 global report from the International Labour Organization, companies with inclusive business cultures and policies have a higher probability of increased profitability and productivity, an enhanced ability to attract and retain talent, and a higher degree of creativity, innovation and openness.¹² Many other studies come to similar conclusions, demonstrating that having a diverse and inclusive workforce greatly improves innovation, performance and talent attraction.¹³

Despite efforts to strengthen diversity and equity, persons with disabilities often still face significant difficulties in the workplace. Approximately 16 per cent of the world's population, (an estimated 1.3 billion people), are persons with disabilities, which is why they are sometimes referred to as 'the world's largest minority'¹⁴ and represent a large pool of untapped talent. Data from the United Nations Department of Economic and Social Affairs show that, on average, 36 per cent of persons with disabilities are employed compared with 60 per cent of other persons.¹⁵ Women with disabilities are more excluded from employment than men.¹⁶

Persons with disabilities often face a workplace environment that is not tailored to their needs and requirements and presents barriers to their equal participation in the workplace.¹⁷ This is also influenced by the traditional notion of what an ideal, typical or universal worker should be (i.e., productive and able-bodied) and how systems and organizations have been built on a foundation of 'ableist' norms.

While most people think of persons with disabilities as those with visible or apparent disabilities, such as people who use mobility devices (e.g., wheelchair), the majority of persons with disabilities are actually those with non-visible¹⁸ or not apparent disabilities (e.g., psycho-social disability, neurodivergence, visual and auditory disabilities and someone with a chronic illness may need RA). Discrimination can take many forms and is experienced differently by different groups of persons with disabilities depending on the type of their disability and barriers experienced – physical, informational, communication and attitudinal.

¹² ILO (2019), [The business case for change](#), p. 21

¹³ Forbes (2022), [The Importance Of Diversity And Inclusion For Today's Companies](#); Harvard Business Review (2018), [How and Where Diversity Drives Financial Performance](#)

¹⁴ Thom Dennis and Jane Hatton (2021), [Diversity, Inclusion and Disability](#)

¹⁵ UN (2018), [Disability and Development Report](#), p.152

¹⁶ Ibid., p.108

¹⁷ Debra Ruh (2021), [Creating A More Accessible And Inclusive Workplace For People With Disabilities](#)

¹⁸ The term 'non-visible disability' is used in this report. Other terms are used in this context, including 'invisible disability,' 'less visible disability,' and 'hidden disability.' The terms 'hidden disability' and 'invisible' are avoided by some stakeholders as they may imply a person is deliberately hiding their impairment or condition.

The Convention on the Rights of Persons with Disabilities

While the right to work is recognized in several international and regional legal instruments, the Convention on the Rights of Persons with Disabilities (CRPD), adopted by State Parties in 2006, goes the furthest to clarify the principles and standards of the rights of persons with disabilities. In the CRPD preamble, the definition of disability stems from a human rights perspective and therefore is a social construct wherein: “persons with disabilities are not seen as ‘objects’ of charity, medical treatment, and social protection” but instead, persons with disabilities are viewed as “‘subjects’ with rights, who are capable of claiming those rights and making decisions for their lives based on their free and informed consent as well as being active members of society.” Thus, the CRPD turns away from the medical model of disability, which relies heavily on diagnosis as the criterion for everything else and is grounded in the social and human rights models of disability.¹⁹

According to the CRPD, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis.²⁰ Article 27 of the CRPD clarifies the right of persons with disabilities to work on an equal basis with others and was the first international legal instrument to mention reasonable accommodation.²¹ Accordingly, successfully addressing the aforementioned barriers in the workplace would mean that employees with disabilities and applicants with disabilities for job vacancies have an equal opportunity to work, bring their skills and grow their careers.

The concept of reasonable accommodation

A key element in the inclusion of people with disabilities in the workplace is the provision of reasonable accommodation.²² A reasonable accommodation is what an employer does for an employee or applicant with disability to remove a workplace barrier.

The CRPD defines reasonable accommodation as:

“Necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.”²³

While the majority of countries (80 per cent) prohibit disability-based employment discrimination either broadly or in at least one dimension of work, these non-discrimination provisions are not always accompanied by guarantees of reasonable accommodation. Just slightly more than half of countries globally (52 per cent) guarantee reasonable accommodation to workers with disabilities.

¹⁹ See glossary entry for ‘[Models of Disability](#)’

²⁰ CRPD, [Article 1 – Purpose](#)

²¹ CRPD, [Article 27 – Work And Employment](#)

²² Which, in some countries, are also called *reasonable adjustments; adaptations or measures; effective or suitable modifications*, see UN Department of Economic and Social Affairs (2005): [The concept of reasonable accommodation in selected national disability legislation](#)

²³ CRPD, [Article 2 – Definitions](#)

Figure 1. Overview of countries in which employers are required to guarantee reasonable accommodation to workers with disabilities²⁴



Some good international practices in defining reasonable accommodation can be found in the US and EU legislations. In the United States, under the Americans with Disabilities Act, a reasonable accommodation is a modification or adjustment to a job, the work environment, or the way things are usually done during the hiring process. These modifications enable an individual with a disability to have an equal opportunity not only to get a job, but to successfully perform their job tasks to the same extent as people without disabilities.²⁵ Under EU rules, employers must provide reasonable accommodation to employees with disabilities. Reasonable accommodation is any change to a job or a work environment that is needed to enable a person with disability to apply, perform and advance in job functions, or undertake training.²⁶

Reasonable accommodation usually works on a case-by-case basis and refers to the needs of an individual person who may request modifications and/or forms of support in specific circumstances. RA is a negotiation and is meant to enable persons with disabilities to exercise their rights on an equal basis with others. It can be a one-time adjustment, such as ensuring an accessible workspace, paying for a personal assistant to accompany an employee on a trip, providing assistive devices, or reorganization of the job. Or it may require an ongoing adjustment, such as sign language interpretation or personal assistance at work.

²⁴ Jody Heymann, Elizabeth Wong, and Willetta Waisath, [A Comparative Overview of Disability-Related Employment Laws and Policies in 193 Countries](#), Volume 33, Issue 1, Journal of Disability Policy Studies, 2021.

²⁵ The Americans with Disabilities Act (ADA) is a federal civil rights law in the United States that prohibits discrimination against people with disabilities in everyday activities. The ADA requires reasonable accommodations as they relate to three aspects of employment: 1) ensuring equal opportunity in the application process; 2) enabling a qualified individual with a disability to perform the essential functions of a job; and 3) making it possible for an employee with a disability to enjoy equal benefits and privileges of employment. Accommodations are sometimes referred to as 'productivity enhancers.' Reasonable accommodation should not be viewed as 'special treatment,' and they often benefit all employees. Source: U.S. Department of Labor (2023), [Accommodations](#)

²⁶ Under EU rules, employers must provide reasonable accommodation to employees with disabilities. Any changes, and the related costs, must be realistic and not impose a disproportionate burden on the business. Reasonable accommodation is aimed at any employee with a disability. The right to reasonable accommodation extends to all work-related activities covered by EU law, from the job application process through termination. It also extends to working conditions and fringe benefits. Source: European Union (2023), [Reasonable accommodation](#)

Accessibility and reasonable accommodation are linked. Accessibility standards can be implemented incrementally and with more permanent features that anticipate related reasonable accommodation requests in the future. Reasonable accommodation can help improve accessibility, and the more accessible and inclusive an organization is, the less reasonable accommodation will be needed.²⁷

Two aspects are of particular importance towards a more comprehensive understanding of reasonable accommodation and are important concepts in deciding whether a reasonable accommodation request shall be granted: *reasonableness* and *undue burden/undue hardship*. Accommodations are considered reasonable if they justifiably remove the barrier experienced by the person²⁸ and do not create an undue burden/hardship.²⁹

***Undue burden* means significant difficulty or expense and focuses on the resources and circumstances of the particular employer in relation to the cost or difficulty of providing a specific accommodation.** Undue hardship refers not only to financial difficulty, but to reasonable accommodations that are unduly extensive, substantial, or disruptive, or those that would fundamentally alter the nature or operation of the business/organization. An employer must assess on a case-by-case basis whether a particular reasonable accommodation would cause undue hardship. An employer is generally not required to make reasonable accommodations that would constitute an undue hardship. At the same time, however, the burden of proof is also on the employer to demonstrate that an adjustment would constitute an undue hardship.³⁰

The CRPD does not provide guidance on how undue burden should be decided, as it is likely to vary greatly in each individual situation.³¹ The assessment of whether it is an undue burden changes based on the context, including the resources available. Furthermore, undue burden is usually aligned with other considerations for an organization such as the duty to provide due diligence to ensure that expenditures or application of rules are fairly and equally administered.

The Job Accommodation Network (JAN) In the United States maintains an [A to Z of Disabilities and Accommodations website](#) which provides sample accommodations by disability, by limitation, by work-related function (e.g., safety standards), by topic (e.g., testing accommodations) and by accommodation (e.g., job restructuring). In the US (and beyond) it is considered the most extensive database available and the primary resource for individuals to see what they may need.

Disability inclusion efforts in UNICEF

At the level of the UN system, a [United Nations Disability Inclusion Strategy \(UNDIS\)](#) was launched in 2019 to improve standards and performance on disability inclusion across all pillars of its work. The UNDIS enables the UN system to support the implementation of the CRPD. It includes a system-wide policy, an accountability framework with 15 common-system indicators that UN entities report on, and other implementation modalities.

²⁷ UN WOMEN (2023), [Accessibility and reasonable accommodation](#), p. 2

²⁸ CRPD (2018), [General comment No.6 on equality and non-discrimination](#)

²⁹ ADA National Network (2024), [Reasonable Accommodations in the Workplace](#). Key definitions.

³⁰ U.S. Equal Employment Opportunity Commission (2002), [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#)

³¹ Katja Karjalainen and Marjo Ylhäinen (2021), [On the obligation to make reasonable accommodation for an employee with a disability](#)

Reasonable accommodation is required by all UN entities, including UNICEF, as per indicator 7 of the UNDIS,³² which is reported annually to the UN Secretary-General. The UN Secretary-General has also made it clear that the UN wants to be an employer of choice for persons with disabilities.³³

At UNICEF, each component of the term diversity, equity and inclusion describes a distinct aspect. Diversity represents the wide variety of personal characteristics, both visible or less visible, that make us similar to and different from one another, such as ethnicity or disability. Equity is the act of ensuring fair treatment and access, so that no one is left behind. And inclusion comes through actions taken to understand, embrace and leverage all individual' unique identities and perspectives so that all feel welcomed, valued and supported.³⁴ Efforts to promote diversity, equity and inclusion also often mean taking action to improve the lives of people who have been historically excluded or marginalized.³⁵

UNICEF has made the inclusion of people with disabilities a priority both for its programmatic work and within the organization. The organization's current Strategic Plan includes programming on disability rights as a cross-cutting dimension.³⁶ In early 2022, UNICEF published a report on the well-being of children with disabilities, of which there are 240 million worldwide, representing 10 per cent of the world's children.³⁷ To support the organization's commitment to inclusive programming, UNICEF has a Disability Team in the Programme Group that provides technical support through developing tools and guidance and supporting country offices. The Disability Team is also responsible for global leadership, advocacy and innovation, establishing partnerships and securing funding.

UNICEF's Strategic Plan (2022-2025) identifies 'Dynamic and inclusive people and culture' as an organizational performance enabler and states that "inclusion and representation will be prioritized, so that every member of the UNICEF workforce can count on feeling safe, respected and valued. A key part of this is ensuring adequate representation of marginalized groups across all functional areas."³⁸ The successful inclusion of employees with disabilities is expected to also inform and benefit the organization's programmatic work to effectively support children with disabilities. Moreover, related efforts are a direct response to demands of colleagues with disabilities to adequately address their needs and shape the organization into a truly inclusive workplace.³⁹

Different resources and initiatives aim to support the inclusion of persons with disabilities at UNICEF. For example, the organization's intranet has dedicated pages to disability inclusion in UNICEF programmes and operations with technical resources, publications and reports. UNICEF has a procedure on disability-inclusive human resources management, a guide on inclusive employment related to disability and its intersections,⁴⁰ and there is a global network of employees with disabilities (called *Disability Connect*) and another employee resource group of UNICEF employees with dependants with disabilities.

³² UN (2019), [United Nations Disability Inclusion Strategy](#), see p. 7, 15

³³ UN (2020), [Press Release, United Nations Aims to be Employer of Choice for World's 1 Billion People with Disabilities](#)

³⁴ UNICEF (2022), Glossary of terms related to diversity, equity and inclusion, p.11-12 (Internal document)

³⁵ Gallup (2022), [Advancing DEI Initiatives: A Guide for Organizational Leaders](#), p. 6

³⁶ UNICEF (2021), [UNICEF Strategic Plan, 2022-2025](#) (Executive Board Document), p. 9

³⁷ UNICEF (2022), [Seen, Counted, Included. Using data to shed light on the well-being of children with disabilities](#)

³⁸ UNICEF (2021), [UNICEF Strategic Plan, 2022-2025](#) (Executive Board Document), p. 20-21

³⁹ UNICEF (2020), [UNICEF is striving to be a disability-inclusive employer](#) (Video)

⁴⁰ UNICEF (2021), Inclusive Employment Guide. Disability and its intersections. (Internal document)

The Culture and Diversity team in the Office of the Executive Director (OED) includes a dedicated focal point for disability inclusion. The team coordinates and aligns organizational culture and diversity, equity and inclusion approaches across offices and all areas of UNICEF's work. The team was officially established in January 2022 and resulted from a merge between the previous Diversity & Inclusion team (located in the Division of Human Resources) and the Organizational Culture Team (located in the Office of the Executive Director). The team leads several organizational initiatives, such as Pulse Check on Workplace Culture, the Diversity Dashboard, the implementation of the UN System-wide Strategy on Gender Parity and the UN Disability Inclusion Strategy.

While UNICEF is putting policies and procedures in place to advance disability inclusion, it does not currently have a formal mechanism or platform to determine the overall number of personnel with disabilities. UNICEF's Global Staff Survey (GSS) is a formal mechanism to collect data on employee diversity and experience, based on voluntary self-disclosure. UNICEF has also undertaken dedicated disability surveys from time to time. Internal data of UNICEF's last GSS conducted in 2022 indicated that 308 out of 14,747 respondents self-identified as persons with disabilities, which corresponds to a share of 2.1 per cent. Another 558, or 3.8 per cent, stated they preferred not to state whether they were a person with disability.⁴¹ While initiatives that provide persons with disabilities the opportunity to self-disclose should be encouraged, they need to be accompanied by sound data privacy protection systems and processes, aligned with UNICEF Policy on Personal Data Protection and the UN internal policy on data protection,⁴² as well as organizational culture efforts that value diversity, tackling stigma in the workforce and building psychological safety and trust.

To advance and outline UNICEF's commitment to disability inclusion, UNICEF developed and endorsed its first ever [Disability Inclusion Policy and Strategy \(DIPAS\) 2022-2030](#). The DIPAS builds on the foundation of the UNICEF Strategic Plan, 2022–2025, and is intended to guide UNICEF's work on programmes, operations, and culture towards disability inclusion. It provides strategic direction and a framework for accelerating disability-inclusive programming and operations to achieve results at scale, based on evidence, lessons learned and good practices. It also includes a roadmap for the organization to strengthen cross-sectoral work for disability inclusion, as it works towards the achievement of the 2030 Agenda for Sustainable Development, implementation of the CRPD and UNDIS.

The DIPAS clearly states that UNICEF aims “to become a model for an inclusive, diverse workplace and a global leader for disability inclusion.”⁴³ The DIPAS clarifies that this will require multiple and overlapping strategies: on the one hand within and across UNICEF's programmatic work, and on the other hand regarding its operations, systems and structures. Accordingly, the DIPAS outlines a number of concrete goals, cross-sectoral strategic priorities and programmatic and organizational strategies supported by key enablers.

As one of its goals, the DIPAS calls for UNICEF to gradually increase the number of employees with disabilities across all offices by at least 2 per cent by 2025, with the aim of reaching 7 per cent by 2030.⁴⁴ As it currently stands, this will be determined by self-declaration of disability status, which may influence accuracy of the statistics and achieving these targets. In this context, it can be assumed that the organization's provisions for

⁴¹ UNICEF (2022), Global Staff Survey. (Internal document)

⁴² [A/HRC/49/60 \(undocs.org\)](#)

⁴³ UNICEF (2022), [Disability Inclusion Policy and Strategy \(DIPAS\) 2022-2030](#), p. 4

⁴⁴ Ibid.

reasonable accommodation will play a central role, as well as the various efforts to make UNICEF more disability inclusive, because the more the organization's culture shifts towards positive, universal inclusion, the more people will share their disability status.

'Accessibility and reasonable accommodation' is identified as one of five organizational strategies in the DIPAS.⁴⁵ The DIPAS states that "reasonable accommodation forms part of the rights of all employees with disabilities, ensuring they function at their maximum capacity."⁴⁶ The RA Fund is explicitly mentioned as a means to support disability-inclusive employment and to provide specific accommodations needed by job candidates and employees (staff and non-staff) with disabilities. The DIPAS also indicates that UNICEF is expected to commit to increasing the level of resources available in the Fund as the number of staff with disabilities in the organization increases. Moreover, it specifies that the availability of reasonable accommodations through the Fund must be upheld and promoted by all UNICEF managers and human resources practitioners globally, to ensure employees with disabilities are aware of its existence and can request it, if and when needed.⁴⁷

Overview of UNICEF's Reasonable Accommodation Fund

UNICEF first made a formal commitment to provide reasonable accommodation for employees and applicants with disabilities in 2011 with the signing of an Executive Directive by Anthony Lake, UNICEF's Executive Director at the time. Subsequently a fund was set up and the first requests were processed in 2012, with more formal efforts by senior leadership to publicize the RA Fund in 2013.

The purpose of UNICEF's RA Fund is to provide the necessary and appropriate modification and adjustments to ensure applicants and employees with disabilities enjoy and exercise all human rights and fundamental freedoms on an equal basis with others⁴⁸ in line with the definition used in the CRPD.⁴⁹

Initially the RA Fund covered all types of accommodations, from making buildings accessible to providing specific work equipment and offering flexible working or special travel arrangements. In the initial years of the RA Fund there were only a few requests from two to three people per year.⁵⁰ In 2020, the RA Fund was significantly increased (from US\$50,000 to US\$300,000 annually), accompanied by a new *Guide for RA Requests* and scaling up of strategic communications across the organization to increase awareness that the RA Fund exists. The reasonable accommodation request process was automated and streamlined so that all UNICEF employees (staff and non-staff, the latter including consultants, interns, and UN Volunteers) could directly request reasonable accommodation through UNICEF's internal Service Gateway. Job applicants were able to do so through HR focal points or hiring managers.

Over time UNICEF also established standard operating procedures and other funding mechanisms to address related areas which apply to all staff, not just individual staff with disabilities. For example, the Greening and Accessibility Fund was established in 2016

⁴⁵ UNICEF (2022), [Disability Inclusion Policy and Strategy \(DIPAS\) 2022-2030](#), pp. 70-78. The other four are: institutional architecture and capacity; information and communication; supply; and communications and advocacy.

⁴⁶ Ibid., p. 72

⁴⁷ Ibid., pp. 72-23

⁴⁸ UNICEF (2020), *Guide for Reasonable Accommodation Requests*. (Internal document)

⁴⁹ CRPD, [Article 2 – Definitions](#)

⁵⁰ UNICEF (2020), *Guide for Reasonable Accommodation Requests*, p. 6. (Internal document)

to support country offices in improving facility or office accessibility (e.g., installing a ramp or elevator, adding braille to signage) for persons with disabilities. In this context, it is important to keep in mind that accessibility and reasonable accommodation are two related but distinct concepts of equality law. Generally, accessibility refers to groups, while reasonable accommodation is individualized and usually benefits only the person requesting the accommodation. **As such, the RA Fund is only one part of UNICEF's overall approach to provide accommodations for employees with disabilities.**

The RA Fund is administered through UNICEF's Division of Human Resources (DHR) and its request and decision-making process is managed by the organization's Culture and Diversity team in the Office of the Executive Director (OED). Numerous teams within UNICEF (i.e., DHR's Operations team, OED's Culture and Diversity team, Programme Group's Disability team, ICTD, Division of Financial and Administrative Management, Division of Global Communications and Advocacy, Supply Division) have worked in consultation with employees with disabilities to make the RA Fund operational and inform employees, applicants, human resource colleagues and managers about the RA Fund and how to support requests, including with procurement of relevant goods and services.

Currently, the RA Fund model is designed to cover reasonable accommodations for individual employees and applicants. This includes staff, interns, UN volunteers, consultants, JPOs and individuals applying to work for the organization. All requests for reasonable accommodation should be submitted to the RA Fund through the online platform. Requests for accommodations under US\$2,500 are reviewed by the Culture and Diversity Team, whereas accommodations over US\$2,500 are reviewed by a Reasonable Accommodation Committee. There may also be instances where accommodations are provided at the office level without a cost, and therefore are not handled through the RA Fund. UNICEF also provides offices with US\$500 for accommodations provided as part of a recruitment process. The offices can request reimbursement by submitting an RA request through Service Gateway.

3. PURPOSE, OBJECTIVES AND SCOPE

The purpose of this evaluation was to assess whether UNICEF's RA Fund meets the needs and expectations of all of UNICEF's personnel that require its support; whether it is in line with relevant international and UN-specific guidelines; and to provide evidence-based insights and recommendations to inform the organization's future model for the Fund and related decision-making processes. The evaluation was mainly forward-looking and formative in character, based on the assessment of past results and experiences.

The specific objectives of this evaluation were as follows:

- **Conformity with relevant guidelines:** To assess the extent to which the current RA Fund model is compliant with CRPD principles and UNDIS requirements
- **Benchmarking with good and proven practices:** To compare the current model with good and proven practices on reasonable accommodation in literature and among other organizations
- **Internal relevance and coherence:** To clarify the extent to which use of the RA Fund is implemented consistently within the organization; the extent to which it is aligned with other relevant organizational policies; and its relevance for employees with disabilities in the context of broader HR tools and policies, health insurance, wellbeing, and occupational health provisions
- **Quality of operationalization:** To determine the extent to which the use of the RA Fund is regulated by rules that are transparent, clear, and easy to understand for all involved; and understand the quality of operationalization in terms of existing procurement processes, as well as barriers and enablers in this context
- **Use and results achieved:** To determine the extent to which the RA Fund has achieved satisfactory results in that its use has met related reasonable accommodation requirements and facilitated the mitigation of barriers in relation to essential job functions and to create an equitable work environment
- **Overall readiness and suitability:** To identify the extent to which the current model meets the requirements for an effective, efficient and sustainable future provision of reasonable accommodation while allowing it to deliver on the recently established DI-PAS successfully and in line with the CRPD and the requirements of the UNDIS.

The evaluation is expected to inform the future design and approach of the RA Fund and of related elements in its broader context. In this way, the evaluation aims to contribute to the successful inclusion of persons with disabilities in UNICEF. The evaluation comes at a time when there are strong UN-wide efforts and related inter-agency discussions aimed at strengthening the inclusion of persons with disabilities, including the provision of reasonable accommodation. Therefore, the evaluation will enable UNICEF to make a valuable and evidence-based contribution to this discussion.

The primary intended users of this evaluation are UNICEF colleagues involved in the provision of reasonable accommodation and disability inclusion (primarily DHR and the Culture and Diversity Team); managers within UNICEF that may be involved with RA requests; current or future UNICEF colleagues or applicants that require reasonable accommodation; and UNICEF Senior leadership responsible for promoting and fostering an inclusive organization.

Secondary intended users of this evaluation include UN colleagues involved in inter-agency discussions on this topic; and the global community of researchers, consultants and experts working to advance the knowledge, understanding and provision of RA.

Scope

The scope of this evaluation encompassed all aspects related to UNICEF's RA Fund from its inception in 2011 with the signing of the Executive Directive to the end of 2022 and its use across the various organizational levels (global, regional and country levels).

This evaluation focused on the RA Fund. There are many other means by which UNICEF as an organization and employer provides reasonable accommodation for persons with disabilities that were not within the scope of this evaluation. The evaluation shows how the RA Fund relates to other policies and procedures that address accessibility and accommodations, such as the Procedure on Flexible Working Arrangements or the Greening and Accessibility Fund for improvements in office accessibility and staff well-being and occupational health and safety processes.

While the evaluation did not directly evaluate how UNICEF addresses accommodations that do not have an associated cost, it considered them in terms of how relevant and complementary the RA Fund is in the context of broader HR tools and policies.

Evaluation questions

To achieve its objectives, the evaluation addressed five key evaluation questions:

- 1. To what extent is the current model in line with relevant guidelines and good and proven practices?**
- 2. How relevant is the Fund within the organization and how coherent is it with other related tools and policies?**
- 3. To what extent is the Fund's model clearly and consistently defined, organized and communicated?**
- 4. What have been the main results achieved so far?**
- 5. To what extent is the current model suitable to meet related objectives and requirements?**

These questions were developed together with the key stakeholders during the design of the evaluation. Apart from minor wording adjustments, there have been no deviations in the evaluation questions from the original Terms of Reference. The evaluation framework in Annex 1 provides more details on the sub-questions under each of these questions and shows how the different data collection methods and sources contributed to answering them.

4. METHODOLOGY

The evaluation was based on a mixed-methods approach, using different types and sources of data, and was guided by three specific lines of inquiry, an analytical framework, and a set of principles, which are explained in more detail below.

Approach

UNICEF's RA Fund is not based on an explicit logic model. During the exploratory phase of this evaluation, the evaluation team began to develop a logic model to underpin the assessment. However, this was later discarded as the added value was not evident, particularly as the related assumptions, pathways and intended outcomes of providing reasonable accommodation are already well established and supported by numerous studies and experiences.

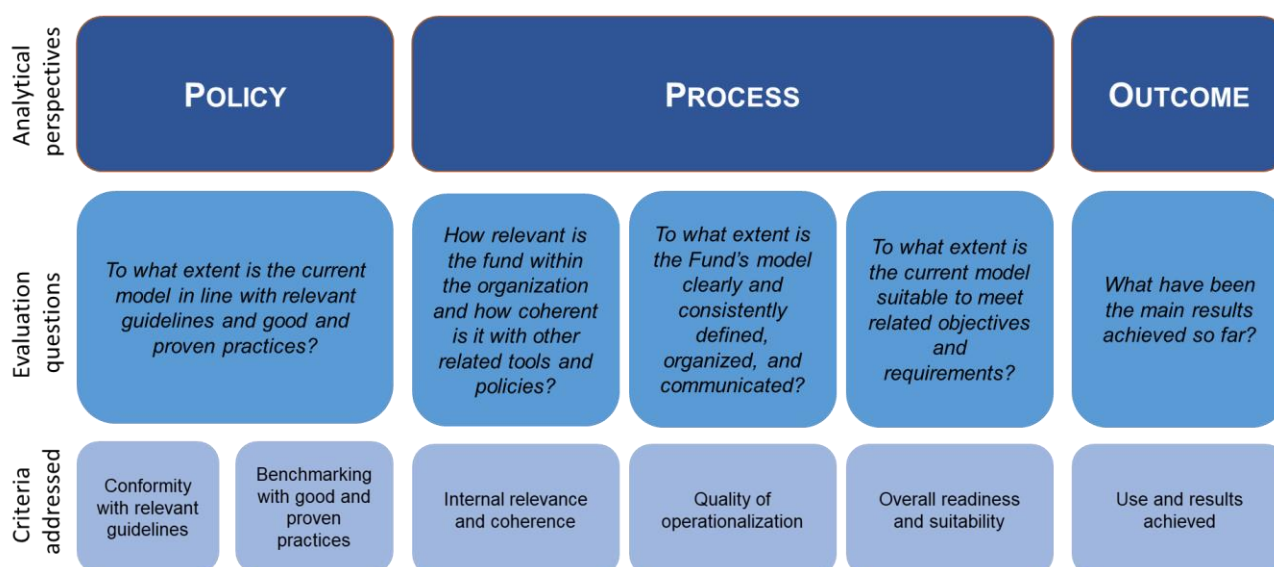
Instead of a theory of change, the evaluation was guided by the specific lines of inquiry addressed by the evaluation questions it sought to answer. These resulted in three distinct perspectives incorporating elements of **policy**, **process** and **outcome evaluation**:

- The evaluation assessed the RA Fund's model in the sense of a policy⁵¹ designed and offered by the employer/organization, including elements such as its alignment with relevant guidelines and good practices or its coherence with other related tools and policies (*policy evaluation*).
- The evaluation also assessed how reasonable accommodation provided through the Fund has been operationalized, reviewing the efficiency of its governance and processes, and the consistency of its use across the organization (*process evaluation*).
- The evaluation examined the effectiveness of the Fund in the sense of an intervention intended to produce change, by reviewing results achieved regarding the Fund's contribution to providing an equitable working environment (*outcome evaluation*).

The specific objectives and key questions of this evaluation were addressed through three lines of inquiry (see Figure 2. *Methodological approach*). This approach allowed the evaluation team to frame conclusions in the areas of **policy** strengthening, **process** improvement, and increasing effectiveness at **outcome** level addressing the most salient criteria in each of these areas. The recommendations of this evaluation have been shaped accordingly building on these conclusions (but were then reorganized in the further course of reporting, validation and co-creation of recommendations with key stakeholders).

⁵¹ Whereby *policy* is understood as a deliberate system of guidelines for decision-making to achieve specific outcomes.

Figure 2. Methodological approach



To assess the extent to which the current model is in line with relevant guidelines and good and proven practices (the *policy* component), the evaluation team reviewed the RA Fund’s approach against the requirements of the CRPD and the UNDIS. It also applied a benchmarking approach, comparing the Fund’s model with those of other organizations, including other UN entities,⁵² as well as the private and public sectors. The evaluation team also reviewed numerous reports and documents from private sector entities and interviewed seven representatives from different companies to gather information about best practices and lessons learned that could be adapted to UNICEF’s needs and internal procedures.

In the *process* component (what is the internal coherence of UNICEF’s model and how can it be improved to fit its purpose), the evaluation prioritized key informant interviews along with documentation reviews as the combined methodological strategy to reveal bottlenecks or gaps between what people with disabilities needed for their work and what the different systems in UNICEF were capable of coordinating and offering to them.

To measure the level of effectiveness of UNICEF’s RA Fund model, (the *outcome* component), the main paths to gather both quantitative and qualitative evidence were internal data (in particular, records of requests and responses made to and by the RA Fund), key informant interviews, and an online survey for UNICEF personnel with disabilities. This line of inquiry focused most importantly on the perceived performance of UNICEF’s model, including how past and current users feel that it enabled them to have equal employment opportunities and whether the Fund contributes to an equitable working environment.⁵³

⁵² The evaluation team reviewed policies and procedures of 10 other UN agencies, namely DCO, ILO, IOM, OHCHR, UNCHR, UNDP, UNFPA, UN Women, WHO, WFP. For all but one of the agencies, interviews were also conducted with representatives of the agencies to obtain further details.

⁵³ The evaluation questions and associated criteria overlap strongly with the [OECD DAC evaluation criteria](#) (a normative framework that is commonly used to guide evaluations): *Relevance* and *coherence* are explicitly addressed while *effectiveness* is mainly covered by ‘Use and results achieved’, *efficiency* by ‘Quality of operationalization’ and *sustainability* by ‘Overall readiness and suitability.’

Evaluation principles

The evaluation was guided by the following principles:

Human rights-based approach: This evaluation acknowledged the human rights-based approach to disability and the broader context in which this evaluation was conducted. This means respecting the inherent dignity, individual autonomy, including the freedom to make one's own choices, and independence of persons with disabilities.⁵⁴ Since this evaluation explored people's experiences and opinions of the RA Fund, both positive and negative, particular attention was paid to creating a supportive environment where participants could end interviews at any time without explanation. This evaluation put in first place the difference and acceptance of persons with disabilities as part of human diversity and humanity, as well as the equality of opportunity between men, women and gender non-binary.

This evaluation was gender-sensitive, meaning it considered the unique needs of females, valuing their perspectives and respecting their experiences. This characteristic, along with age, disability and geographic location to the extent possible, were explicitly considered to define major target groups⁵⁵ of the primary data collection activities.

Accessibility: The evaluation undertook the following measures to ensure activities and communications related to the evaluation were fully accessible:

- The evaluation terms of reference and inception report were shared in both Word and PDF formats to accommodate user needs and preferences -- the Word document was verified as accessible by using Microsoft's Accessibility Checker.
- When inviting individuals for key informant interviews, the evaluation team asked if interviewees needed any accommodations for the interview (e.g., sign language, a specific meeting platform that is more accessible for them, a specific time of day, providing the interview questions in advance) and accommodations were provided whenever they were requested.
- The survey platform used (Microsoft Forms) was accessible for JAWS and NVDA, two of the most commonly used screen readers.
- Techniques were incorporated into documents to make them easier to read, such as using bullet points, bold words and phrases, and ensuring tables and graphs had alternative text descriptions.
- All presentations and the final report were shared as accessible documents.

Transparency, meaningful participation and ownership: The evaluation took concrete steps to foster strong engagement and ownership of the evaluation process and outputs among the primary intended users. All participants were selected based on their knowledge or experience in relation to RA. The evaluation selected individuals that had managed RA efforts, been a recipient of RA, conducted research on RA or were viewed nationally or internationally as a leader on RA.

Uphold maximum confidentiality and minimize risks: In line with the *do no harm principle*, the evaluation took steps to minimize risks to and burdens on people participating in the evaluation. The evaluation took steps to try to prevent participants from facing stigma or

⁵⁴ UN (2006), [Convention on the Rights of Persons with Disabilities](#), Article 3 – General Principles

⁵⁵ For example, UNICEF employees with disabilities, users of the Fund, public and private sector experts, academia, organizations of persons with disabilities, and other UN agencies and entities

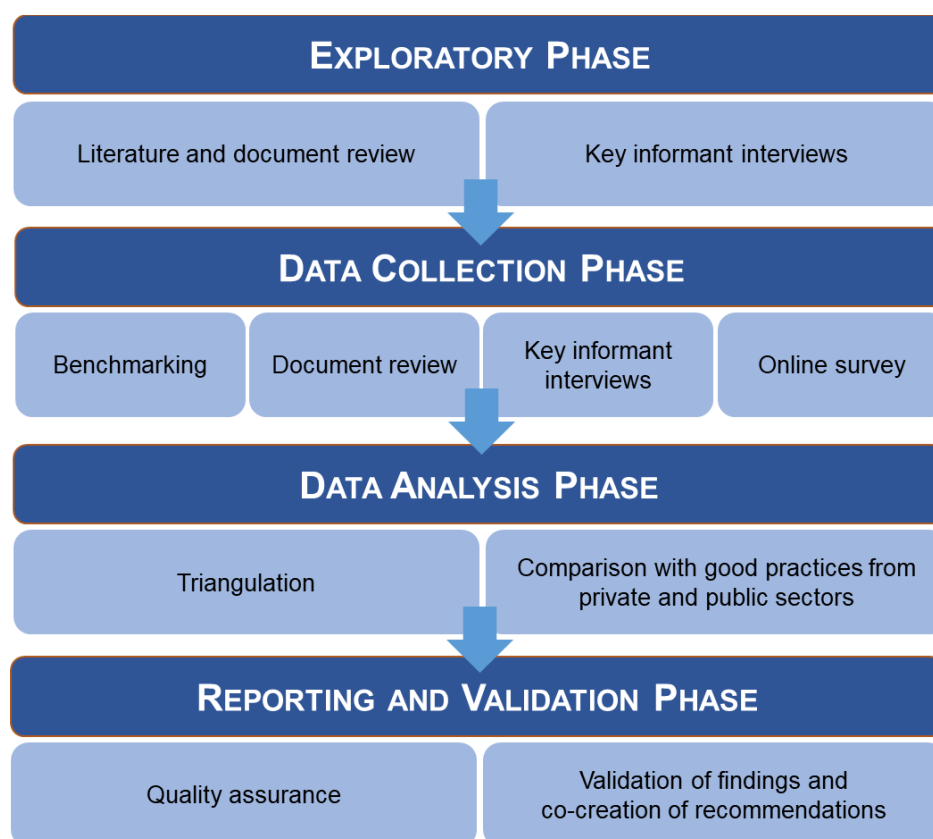
discrimination due to their participation in the evaluation on the basis of disability or any other factor. Respecting and ensuring participants' right to privacy was of utmost importance. Interviewees were clearly informed of the confidentiality measures being taken in data collection and the final report, and the importance of anonymity was emphasized.

Adhere to values and standards of good practice in evaluation: This evaluation was conducted in accordance with the values of the United Nations, as expressed in the UN Staff Rules and Regulations and Standards of Conduct for the International Civil Servant, as well as international human rights and UN policies (e.g., UNDIS). It followed and was guided by the [UNEG Norms and Standards for Evaluation](#) and the [UNEG Ethical Guidelines for Evaluation](#). Key informant interviews were undertaken based on agreement that details would not be attributed to a specific person or organization. Notes from the interviews and discussions were kept digitally in secure online storage.

Evaluation process

The evaluation process followed four main phases that evolved in an 'adaptive' process that took into account the sensitivity of the issues addressed as well as the challenges that arose during the evaluation in terms of data availability, its confidentiality and the different perspectives that had to be considered and harmonized to achieve objectivity and transparency.

Figure 3. Evaluation process



The evaluation started with an exploratory phase, which entailed a review of literature and key internal documents, along with preliminary discussions with key stakeholders, within and outside UNICEF. The main data collection then took place, relying on various methods and sources of information (more details are provided in the section on data sources below).

In answering the evaluation questions, the assessment relied on triangulation (i.e., to draw on different data sources and collection techniques to gather different perspectives and test the consistency of information). Data collected was analysed through both normative and conceptual lenses on disability inclusion and reasonable accommodation and contrasted with recent evidence of good practice and experiences from the private and public sectors.

Data collection and analysis were guided by an evaluation framework (see Annex 1). The framework established direct linkages between the five main evaluation questions, their 16 sub-questions, and the most suitable indicators and associated data sources to answer them. Any findings or perceptions from a particular source or group of respondents were duly indicated as such in the report.

The final report produced by the evaluation team was quality assured by the UNICEF Evaluation Office. Recommendations were derived from the findings and conclusions of the evaluation and discussed and co-created in validation workshops as well as commented on by key stakeholders and experts, both those of the Evaluation Reference Group and beyond.

Data sources

The evaluation included a document and literature review, key informant interviews, focus group discussion, and an online survey. A diverse group of individuals was consulted as part of this evaluation. This included diversity in terms of disability, age, gender, geographic locations, and level and role within the organization.

Document and literature review

The evaluation team reviewed more than 80 internal UNICEF documents and external literature. The documents were identified by UNICEF colleagues and through online searches through academic databases and libraries, search engines, and based on recommendations from colleagues working in this area. Peer-reviewed publications were prioritized when available. A detailed list of the documents reviewed is available in Annex 2. The evaluation team also reviewed three key sources of secondary data: 1) the RA requests made through UNICEF's Service Gateway; 2) general and disability-specific data from the global staff surveys, specifically from the latest survey (2022), and from the survey dedicated to disability in 2017; and 3) the financial ledger for the RA Fund from 2011 to 2022.

Key informant interviews

As shown in the table below, the evaluation team interviewed 96 key informants remotely and in a semi-structured manner, using video communication services (*Microsoft Teams* or *Google Meet*). The interviews were transcribed using a speech to text transcription application (*Otter.ai*) and combined into a consolidated document with more than 900 pages. Data analysis involved a content analysis of interview notes and identification of common or recurring views and aspects.

Table 1. Overview of key informant interviews

Phases	Organizations/Sectors	Female	Male	Total
Inception Phase	UNICEF	3	4	7
	Other UN organizations	1	2	3
	Technical experts	2	1	3
	Private sector	1	0	1
Data collection Phase	UNICEF Staff responsible for RA and disability inclusion	14	8	22
	UNICEF Operations and HR focal points at country, regional and HQ levels	3	3	6
	Employees with disabilities	9	7	16
	External researchers and technical experts	10	2	12
	Bilaterals and Multilaterals	9	4	13
	Private sector	7	1	8
	CSOs	1	2	3
	Organization of persons with disabilities	0	1	1
	CPRD Committee members	1	0	1
Total		61	35	96

The full list of key informants interviewed is provided in Annex 3. Annex 4 outlines the guiding structure for KIIs, which was adjusted depending on the interviewee and the context of the conversation.

Focus group discussions

The evaluation team attempted to conduct a focus group discussion with members from Disability Connect, UNICEF’s global network of employees with disabilities. However, only two members were available to discuss their experience with the RA Fund, even after multiple efforts to try to reschedule the session. As a result, the participation of those two staff members was more appropriately counted under the category of key informant interviews.

Online survey

One online survey with past, current and potential users of the RA Fund was conducted to provide critical insights into the extent to which the current model is clearly and consistently defined, organized and communicated. The intention was to gain information about the results achieved so far and capture data on the user experience. The survey announcement was disseminated through global staff communications and Disability Connect. The Culture and Diversity team managing the RA Fund also emailed the survey link to all employees who had made requests through the online case management system since 2021.

The survey reached individuals across all of UNICEF’s regions and was conducted in English, French and Spanish, using *Microsoft Forms*, which was accessible to commonly used screen readers. It was designed in line with the UNEG Guidance on Integrating Disability Inclusion

in Evaluations and Reporting on the UNDIS Entity Accountability Framework Evaluation Indicator.⁵⁶ Quantitative data collected through surveys was cleaned and analysed using descriptive statistics, summaries, graphs and tables to find relevant insights, trends and patterns.

A total of 142 individuals within UNICEF completed the survey, of which 75 identified as women, 57 as men, 2 said they are gender diverse/gender non-confirming, and 4 preferred not to say. Additional results and breakdown by age, geographic location, type of contract, number of years with UNICEF, type of impairment or disability, and whether their disability is always present or episodic are provided in the findings section of this report and in Annex 5.⁵⁷

Limitations and mitigation measures

On scope

The evaluation team interviewed 16 UNICEF employees with disabilities. The majority were RA Fund users. They only represented 2 to 4 per cent of the estimated number of UNICEF employees with disabilities, based on recent Global Staff Survey results. Information gathered through interviews was then triangulated with information from the online survey, completed by 142 employees with disabilities, as well as interviews with 28 individuals working for UNICEF on RA or in relevant areas.

It was particularly challenging to forecast how much UNICEF should put aside for RA funding each year and in the lead up to 2030, when UNICEF aims to have at least seven per cent employees with disabilities. While some accommodations have predictable costs (e.g., purchasing a JAWS license), others do not (e.g., costs for personal assistants, travel costs for PAs). It is also impossible to predict what types of disabilities employees will have and thus what accommodations to budget for.

The data provided from the RA Fund administrators in DHR on how the money was spent from 2011-2023 provided the internal labels⁵⁸ and dates the items were paid but did not provide enough data on what each purchase was for (e.g., which accommodation) and who it was for, making it difficult to analyse that information.

Another limitation was that the evaluation team was not able to interview persons with disabilities who had applied for a position with UNICEF but were not selected. This was due to two main factors: a concern regarding contacting unsuccessful candidates with disabilities as they are not asked for consent to such contact during the recruitment process and the risk of UNICEF human resources being perceived as not respecting confidentiality standards of the recruitment process.

This evaluation focuses on the RA Fund. There are many other means by which UNICEF as an organization and employer provides reasonable accommodation for persons with

⁵⁶ UNEG (2022), [Guidance on Integrating Disability Inclusion in Evaluations and Reporting on the UNDIS Entity Accountability Framework Evaluation Indicator](#).

⁵⁷ Initially, a second survey was envisioned to collect information from colleagues involved in a supporting role with RA requests (HR focal points, operations/finance colleagues, and managers at all levels of the organization). However, the evaluation team and UNICEF Evaluation Office colleagues determined the interviews were sufficient in providing information required for this evaluation.

⁵⁸ This data was also available from the Service Gateway data shared from the online RA system (Sept 2021 to Dec 2022) by types of requests, job category, type of disability, approval status, etc. The spending from the DHR data should have helped verify the expenditures. However, identification data of individuals cannot be shared without consent.

disabilities that are not within the scope of this evaluation. This evaluation is limited by not formally considering accommodations without a cost.

On availability of information

The evaluation faced some gaps in essential information. Some requests required multiple contacts to UNICEF staff, who in some cases were not able to provide clear answers without doing their own research. For example, following multiple interviews and emails with UNICEF's ICT⁵⁹ and Supply Divisions, there was still no answer as to whether the long-term agreement with a company to provide assistive technology for employees with disabilities had been extended and if it was still available. Another issue where insufficient information was available was the extent to which RA is included in onboarding processes and information.

It is also worth noting that within UNICEF, information on RA was not fully centralized until the online request portal in Service Gateway was launched in September 2021. The organization only published one annual report since the Fund was established. This meant that the evaluation team had to devote much effort and time to gather relevant information that was dispersed. According to key informants that information will soon be centralized.

Reasonable accommodation is a newer area for the UN in terms of experience and available data, which meant that the evaluation team had to do an extensive literature search for relevant information that was applicable to the UN context. For example, regarding the questions 'who should be eligible or qualify to receive reasonable accommodation' and 'to what extent does the current model meet the principles of the CRPD and UNDIS,' the evaluation team had to interview numerous individuals, study national and international case law and consult multiple times with CRPD legal experts. While there is some agreement among the experts as to who should be able to receive RA, it remains a complicated topic and one that has not been tested much in case law by the UN Dispute Tribunal, so there is still room for interpretation by the CRPD Committee.

Sensitivities

The topic of RA can be highly sensitive and touches on far more than simply if an individual receives an accommodation and how long it takes for them to obtain it. As the evaluation advanced, it became apparent that more attention needed to be given to the organizational culture of UNICEF, as it plays an important role in whether employees feel comfortable (or, perhaps more frequently, uncomfortable) disclosing their disabilities and requesting the accommodation they may need. This contributed to the decision to interview more staff members than was originally anticipated, to document how and why there were breaches in sharing personal information in the procurement of accommodations at the local level.

⁵⁹ Information and Communication Technology

5. FINDINGS

To what extent is the current model in line with relevant guidelines and good and proven practices?

Finding #1: Alignment with the CRPD

The current RA Fund approach is in line with the guiding principles of the CRPD.

The evaluation finds that the Fund's current approach is in line with the eight guiding principles that underlie the CRPD.⁶⁰

- 1) Respect for inherent dignity, individual autonomy, including the freedom to make one's own choices, and independence of persons
- 2) Non-discrimination
- 3) Full and effective participation and inclusion in society
- 4) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity
- 5) Equality of opportunity
- 6) Accessibility
- 7) Equality between men and women
- 8) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities

The provision of reasonable accommodation is an anti-discrimination measure (in line with the second guiding principle), and discrimination based on disability is very broadly defined in the CRPD.⁶¹ The following text from *UNICEF's Guide for Reasonable Accommodation Requests, Inclusive Employment Guide, and Procedure on Disability-Inclusive Human Resources Management* clarifies what UNICEF's approach is to RA and who can apply for accommodations, using the same language as the CRPD:

- *"Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others."*⁶²
- *"Reasonable accommodation means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms."*⁶³

In this context, it can be challenging to define when a temporary disability may become long-term. To this effect, the online RA request form does state: "For the purposes of this form, accommodations for temporary disabilities may also be considered." While occupational health and safety has a responsibility to support individuals with temporary disabilities, the evaluation did not find there was a clearly stated path for individuals with a new impairment

⁶⁰ CRPD, [Article 3 – Guiding Principles of the Convention](#)

⁶¹ And more specifically outlined in CRPD (2018), [General comment No.6 on equality and non-discrimination](#)

⁶² CRPD, [Article 1 – Purpose](#)

⁶³ CRPD, [Article 2 – Definitions](#)

or health condition to receive accommodations to continue their work or to know when they would transition to receive accommodations from the RA Fund.

Finding #2: Alignment with UNDIS and relative position in the UN system

UNICEF's RA Fund model is aligned with the UNDIS and UNICEF is recognized as one of the more advanced UN organizations in terms of experience and expertise in this area.

The current RA Fund model aligns with the objectives outlined in the UNDIS. The UNDIS includes an accountability framework with 15 common-system indicators that UN entities report on, and other implementation modalities. Reasonable accommodation is required by all UN entities, including UNICEF, as per indicator 7, which is reported annually to the UN Secretary-General. UNICEF currently 'meets requirements' for the indicator on RA and fulfils most of its components, which include the existence of a RA policy/strategy that has been implemented with an adequately funded mechanism.

UNICEF already covers elements required and could easily move to 'exceeds requirements' by establishing a system to track and measure the level of satisfaction among users. To date, the organization has not conducted a dedicated survey to assess user satisfaction among RA Fund requesters and recipients. This is in contrast to common practice, for example in the private sector, where anonymous surveys can be filled at any time, or a survey is usually sent out automatically one month and six months after an accommodation is provided (e.g., GSK).

While RA is a relatively new and evolving area for UN entities, UNICEF is widely and constantly recognized as one of the UN's more advanced organizations in terms of experience and know-how. While UNICEF was not the first to establish a policy or procedure for RA (see table below), in 2011 it was one of the first to develop a more sophisticated approach; and one that entailed a centralized fund. As such, HR and disability inclusion focal points from other UN organizations stated in interviews that they were drawing from UNICEF's policy and experience when developing or reviewing their own (notably, DCO, ILO, IOM, OHCHR, WFP, and UNHCR.)

The following table outlines the status of reasonable accommodation policies and disability inclusion focal points from 11 UN organizations reviewed as part of a benchmarking exercise for this evaluation.

Table 2. Status of reasonable accommodation policies and disability inclusion focal points in selected UN organizations

UN organization	Policy, SOP, or guidance notes in place (at least one)	Year of adoption	RA Fund or centralized funding in place	Disability inclusion focal point	Notes
DCO (part of UN Secretariat)	Yes	2022	Yes	Yes	Reasonable Accommodation Process
ILO	Yes	2005	Yes	Yes	Employment policy (2005); information Note about RA reserve (2009)
UNICEF	Yes	2011	Yes	Yes	Executive Directive (2011); Guide for Reasonable Accommodation (2020); Inclusive Employment Guide (2021)
UNDP	Yes	Not available	No information	Yes	Guidance Note on Reasonable Accommodation
UNFPA	Yes	2019	In parts	Yes	Policy on the Employment of Persons with Disabilities (2019)
UNHCR	Yes	2008	Yes	Yes	Policy on the Employment of Persons with Disabilities
UN Women	Yes	2020	No information	Yes	Disability Inclusion Policy 2020 mentions RA
OHCHR	Yes	2018	Yes	Yes	UN Human Rights RA Policy (2018); RA Request User Manual (2021); UN Human Rights Disability Rights Policy (2021)
WHO	Yes	2022	Yes	Yes	Processing and reviewing reasonable accommodation requests WHO eManual
WFP	Yes	2022	Yes	Yes	Executive Director's Circular

Finding #3: Alignment with best practices

UNICEF has incorporated several best practices in the provision of RA into its internal systems and procedures. However, there are other important, well-documented practices that have yet to be adopted.

The RA Fund has adopted several good and proven practices from the private and public sectors, notably a centralized fund, a self-referral pathway (which means that individuals can make their own request without a sign-off needed by their supervisor),⁶⁴ and an online

⁶⁴ Lloyds Banking Group case study conducted by Business Disability Forum in 2014 noted one of the critical success factors to replicate LBG's success is to enable self-referral to a help-desk of expert case advisers (in the case of LBG it was the company Microlink).

application form.⁶⁵ Outside the RA Fund process, but complementary to it, UNICEF has adopted an organization-wide flexible working arrangement procedure⁶⁶ and decision-making of non-costed accommodations at the local/managerial level.⁶⁷

At the same time, the RA Fund could adopt other good and proven practices recommended by Business Disability International, the Jobs Accommodation Network in the US, and other RA experts interviewed. They include:

- A centralized one-stop shop for RA support (also known as a centralized accommodation programme) or single point of entry
- A standard form for attestation/verification of disability when disability is not obvious, enhancing confidentiality by issuing ‘accommodation passport’
- Continuous follow up on all aspects of the request (e.g., procurement and with the requestor) while it is being processed and following implementation of the accommodation
- Having an ICT catalogue for fast-track procurement, and
- Conducting regular communication campaigns and delivering continuous internal communication messages to change attitudes around disability inclusion and disclosure.

Below are descriptions and implications of these good practices to clarify if UNICEF is closer to or further from what has been learned and recognized in academia, the public and private sectors.

The **Centralized accommodation programme (CAP)**, one-stop shop, or workplace accommodation/adjustment service – as it is often called in the private sector⁶⁸ – is viewed as the most efficient and effective mechanism to consolidate subject matter expertise necessary to assess, evaluate and provide guidance on effective and meaningful accommodations.⁶⁹ Case studies regularly point to the fact that it is important to have a “well-published single point of entry (expert help desk) which drives a straightforward, simple process for managers and people requiring adjustments (a ‘one-stop shop’).” The Business Disability Forum recommends to “provide a service which does not require managers to diagnose what is needed nor to order the adjustments or drive the process.”⁷⁰

⁶⁵ At least 10 technical experts and representatives of the private sector interviewed noted this as a best practice.

⁶⁶ A new study from Lancaster University’s Work Foundation think-tank in the UK explored the experiences of employees with disabilities in remote and hybrid working before and during the pandemic. Dr. Paula Holland from Lancaster University, a co-researcher on the study, said, “Our findings bring into sharp focus the benefits that having more autonomy over a work environment has brought so many disabled people in the UK. And, while more than 65 per cent of respondents want to work remotely for the majority of the time, there are around 10 per cent who don’t want to predominantly work from home – what suits one, won’t suit all. What is abundantly clear, however, is that when disabled workers are able to control their working environment, they manage their conditions more easily – they feel healthier and more productive.”

⁶⁷ JAN says managers should be trained to refer any employee requesting accommodation to the designated HR representative. Having one person or unit responsible for handling accommodations is the best way to ensure consistency and legal compliance. See SHRM (2017), [How to Create a Robust Reasonable Accommodation Process](#)

⁶⁸ Business Disability International’s, “Designing Effective & Efficient Workplace Adjustment Services: The 12 Critical Success Factors” (a [box outlining these success factors](#) is also provided further below)

⁶⁹ EARN (2019), [Increasing Disability Inclusion: Centralized Accommodation Programs as a Best Practice](#). The Employer Assistance and Resource Network on Disability Inclusion (EARN) is a resource for employers seeking to recruit, hire, retain and advance qualified employees with disabilities. It is funded by the U.S. Department of Labor’s Office of Disability Employment Policy under a cooperative agreement with Cornell University.

⁷⁰ Business Disability Forum (2014), [Moving from Ad Hoc to Streamlined Efficiency: The Lloyds Banking Group Case Study](#), p. 5

Evidence is clear on why a company or organization should adopt a centralized accommodation programme⁷¹ as it:

- 1) Ensures that requests for reasonable accommodations by applicants and employees are addressed in the most consistent, streamlined, legal and cost-effective manner;
 - 2) Increases the likelihood that hiring managers will comply with their legal obligation to hire the most qualified person, irrespective of an applicant's or employee's disability and need for an accommodation, by removing or reducing concerns about management and administrative burdens, lack of expertise and/or extra costs (recognizing that, according to the Job Accommodation Network, almost half of all accommodations cost nothing, while the remainder had a typical cost of only US\$500);
 - 3) Establishes a single line of responsibility and accountability for the development and implementation of a reasonable accommodation policy (including tracking and addressing cross-cutting, strategic issues such as privacy and security); and
- Helps establish a corporate culture in which employees with disabilities know they can ask for accommodations, which in many cases is a significant decision, without fear or worry.

An important point of reference that has been widely established in various organizations, both private and public, is **a standard form for attestation/verification of disability when disability is not obvious**.

While the RA Fund approved all requests that met the existing criteria, the evaluation team found through interviews that the organizational culture may not be fully aligned with best practices of the private sector,⁷² the International Disability Alliance and the US public sector, which believe the employee knows best what they need to do the essential functions of the job and as result local offices procure the item without further discussion.

Further evidence collected in this evaluation showed there is room to minimize the unnecessary sharing of personal information about one's disability. Consulted country offices, along with HR, operations and programme personnel, often question the requested or approved accommodation, leading requesters to need to share personal information about their disability in order to get the accommodation. A case study done by the Business Disability Forum points out that a critical success factor would be to "trust [your employees] and do not require colleagues to somehow 'prove' they have a disability to qualify for a service which makes it easier to do their job."⁷³

⁷¹ An [online white paper](#) by Disability:IN recommends a Centralized Accommodations Fund as "an enterprise-wide general fund to either partially cover or entirely cover reasonable accommodations for employees with disabilities [which] is considered a corporate best practice. With a centralized reasonable accommodations fund, hiring managers and supervisors do not need to worry about how the cost of these products and services may impact their unit/department budget". The paper also provides a number of best practice examples from various companies. As another example, the US Department of State's Office of Accessibility & Accommodations (OAA) uses a centralized case management and has an internal unit of four reasonable accommodation specialists and two assistive technology specialists that manage reasonable accommodation requests that are submitted by employees and applicants with disabilities. See U.S. Department of State (2021), [Equal Employment Opportunity Commission \(EEOC\) Program Status Report, p. 123](#).

⁷² Lloyds Banking Group case study conducted by Business Disability Forum in 2014 noted one of the critical success factors to replicate LBG's success is to enable self-referral to a helpdesk of expert case advisers (in the case of LBG it was the company Microlink).

⁷³ Business Disability Forum (2014), [Moving from Ad Hoc to Streamlined Efficiency: The Lloyds Banking Group Case Study](#), p. 5

“We trust our people. [By providing RA,] we are just making it easier for them to do their jobs.”

Mark Fisher, Former Lloyds Banking Group
Director of Group Operations

Good practice from the private sector in this area shows the importance of:

- Minimizing referrals to occupational health, thus minimizing the delays and additional costs triggered by unnecessary referrals;
- A first point of contact (helpdesk) to provide triage using experienced workplace adjustment/RA case handlers, removing the need for standardized front-end computer assessments, and the subsequent, almost inevitable, referrals to formal and costly assessments;
- ‘Fast track’ adjustments for colleagues who either know what their needs are or whose needs can be determined by the expert case handler at triage, thus avoiding unnecessary assessments.⁷⁴

In some cases, the disability and need for accommodation will be obvious or otherwise already known to the RA Administrator. Based on good practices, in these cases, further medical information should not be sought. However, when the disability and/or need for reasonable accommodation is not obvious or not otherwise known to the RA Administrator, the organization may require the individual to provide reasonable documentation from a doctor about their functional limitations or disability in relation to their essential job functions. In that case, the RA Administrator should make a request for the individual to complete a standard form.⁷⁵

“The trend is moving away from the medical model – it’s a very ‘ableist’ approach that consumes a lot of time, yet there is a low level of fraud. It is often why people do not disclose – they fear the consequences.”

John D. Kemp, Disability rights lawyer, advocate, author and leader

The accommodation passport helps maintain a separate confidential file for the accommodation process rather than including the information in the employee’s personnel file, which all of HR can access.⁷⁶ This ensures employee privacy.⁷⁷ An explanation of how such a passport works can be found in the box below.

⁷⁴ Business Disability Forum (2014), [Moving from Ad Hoc to Streamlined Efficiency: The Lloyds Banking Group Case Study](#), p. 6

⁷⁵ For examples of such forms see [US Department of State](#) or [Alcorn State University](#)

⁷⁶ Business Disability International (undated), *Designing Effective & Efficient Workplace Adjustment Services: The 12 Critical Success Factors* (see [box further below](#))

⁷⁷ Employers for Change (2023), [Reasonable Accommodation Passport Scheme](#)

Reasonable Accommodation Passport

As the name implies, the construct of this passport is to grant Reasonable Accommodation to an employee (including all contract types) who needs some type(s) of adjustment owing to a disability, impairment, health condition, mental health issue or long-term injury. The Passport does **not** list the health condition or impairment, rather just the accommodations to be provided.

A Centralized Accommodations Office is the issuer of the Passport, and in so doing, they attest to the validity of the request. For example, the requestor might say they need active noise-cancelling headphones because of attention/concentration issues or voice-recognition software because of issues with typing. The RA Office then issues the Accommodation Passport to the employee to share with their manager or any other colleagues, where relevant.

The RA Office retains the number and validity period and any other notations as appropriate. If the Passport needs to be adjusted to reflect new barriers, the requestor returns to the RA Office to have the Passport notated for any changes. All country offices, supervisory personnel, and travel offices must accept the Passport as legitimate proof of the need for the accommodation(s) and no challenges should be made to the employee to provide evidence or further explanation.⁷⁸ This is particularly relevant if they go on stretch assignment or change duty stations, to ensure continuity of the accommodation.

Another good practice is **continuous follow up** or periodic check-ins with users. The U.S. Jobs Accommodation Network advises here that “even after a request is approved and the accommodation is implemented, follow up regularly to ensure that the changes are working for everyone involved. Set a regular schedule for follow-up during the first year and make an accommodations check-in part of the annual performance evaluation process going forward. Document all follow-up activities as they occur.”⁷⁹ It is also recommended to conduct periodic check-ins with users and satisfaction surveys. An expert interview by the Society for Human Resource Management (SHRM) notes here that “an accommodation request is never closed. Even after the change is approved and implemented, check in with the employee and manager regularly to see how the accommodation is working out. Don’t assume everything is fine just because no one is complaining to HR.”⁸⁰

Business Disability International (BDI) noted that a best practice for RA Administrator(s) would be to capture in an internal system whether an RA request is being done on a trial basis or requires follow-up, to trigger more targeted and ongoing case management.⁸¹

Annual performance reviews are also a good opportunity to discuss where changes or issues are happening with accommodation(s) and further adjustments are needed. However, no evidence was found that RA is discussed in UNICEF as part of annual performance reviews by managers/supervisors of staff with accommodations within the non-discrimination and inclusion standard output.

⁷⁸ Employers for Change (2023), [Reasonable Accommodation Passport Scheme](#)

⁷⁹ SHRM (2017), [How to Create a Robust Reasonable Accommodation Process](#)

⁸⁰ The interviewee continues, “saying ‘the employee never raised an issue’ doesn’t mean the employee can’t raise the issue later. A follow-up schedule can lengthen over time. For example, it may make sense to check in with the worker and the manager a few weeks after initial implementation, followed by quarterly meetings during the first year. Going forward, an accommodation check-in should become part of the person’s annual performance review.”

⁸¹ Baroness Jane Campbell DBE noted in her publication, “Secrets & Big News” that anonymous surveys are often the best ways to encourage persons with disability to share information, with a markedly higher return rate. See Kate Nash OBE (2014), [Secrets & Big News: Enabling people to be themselves at work](#), p. 10

Today, most companies providing RA maintain a **catalogue for fast-track procurement**. Experts are advising entities to include both soft (i.e., non-tangible, such as flexible working arrangement) and hard (i.e., tangible items such as noise-cancelling headphones) accommodations. Business Disability Forum highlighted the importance of a catalogue for fast-track procurement, as part of the Lloyd's Banking Group (LBG) Workplace Adjustment Case Study. The report recommended compiling a catalogue that enables expert case handlers and assessors (or an RA Office) to recommend items that have already been pre-approved, removing the need for time consuming approval processes, improving consistency of accommodations and enabling the organization or a third party assisting the entity with accommodations to negotiate economies of scale of suppliers on behalf of the company or organization.⁸² UNICEF has such a catalogue, but it is still not clear if it is currently available for colleagues to use. Considering there is little to no awareness of it, UNICEF is still distant from implementing the best practice.

Another company that is well known for having a readily available accommodations catalogue is JP Morgan Chase, which started productizing accommodations. In practical terms this means "I can't see well, I need...X accommodation," which is in line with the Washington Group on Disability Statistics approach to disability assessment. It removes the need to justify eligibility for RA by disclosing information about one's disability.

Finally, **communication campaigns** to change attitudes among personnel around disability inclusion and disclosure are a common good practice that UNICEF could do more of. The following are examples of campaigns deemed as good practices by RA experts:

- In 2013, a bank started the 'This is Me' campaign to encourage colleagues to tell their personal stories, changing perceptions of disability, mental health and neurodiversity in the workplace. 'This is Me' was built on sharing authentic stories that capture the whole person. The bank provided the support and resources to help everyone to become more disability and mental health confident. In 2016, they shared their experience with the City of London's Lord Mayor's Appeal, which led to more than 400 organizations taking part, with the potential to reach more than 3 million employees.⁸³
- Northrop Grumman, named a 2022 Best Place to Work for Disability Inclusion by Disability:IN and American Association of People with Disabilities for the eighth consecutive year, conducted a self-identification campaign in 2014 called 'Inclusion Begins With You.' The campaign provided information to personnel on self-ID, how to request an accommodation, and disability awareness. It was sent to all employees with an e-mail from the CEO and a video message from the Corporate Vice President-Global Corporate Responsibility. A second self-identification campaign launched in 2016 called 'Count Me In' was comprised of a series of inclusion campaign videos containing employee testimonials distributed to all employees via an e-mail from the Corporate Vice President-Global Corporate Responsibility stressing the importance of self-identification and ability to request accommodations from the centralized budget.

Business Disability International, a prominent organization advancing research and guidance on RA in the private sector, developed a list of 12 Critical Success Factors (see box below).

⁸² Business Disability Forum (2014), [Moving from Ad Hoc to Streamlined Efficiency: The Lloyds Banking Group Case Study](#), p. 6

⁸³ Barclays (2023): [This is Me](#) [company website]

Designing Effective & Efficient Workplace Adjustment Services: The 12 Critical Success Factors

- *A named senior executive is responsible for ensuring the service meets explicit performance standards and drives continuous improvement*
- *A named service manager is responsible for ensuring that the Workplace Adjustment (WPA) service, end to end, meets these standards.*
- *There is a well-publicized single 'door' of entry to the service.*
- *There is a 'real' speed of delivery standard – case studies show that it is reasonable to set a standard that states it will take no more than 14-20 days from when adjustments are first requested to when they are delivered and operational.*
- *The line manager does not pay and does not drive the service for their team member/s.*
- *Employees are trusted to self-refer and are not routinely required to prove they have a disability in order to get the tools, accessibility or flexibility that they require.*
- *There is a well-publicized central catalogue of approved 'hard' adjustments, i.e., technology, assistive devices, furniture.*
- *There is a well-publicized catalogue of approved 'soft' adjustments, i.e. flexitime, rest breaks, medical appointments, disability related absence, etc.*
- *Passports or Workplace Adjustment Agreements capture what has been agreed and delivered for the employee, so they need not renegotiate with a new manager.*
- *Procurement requires key suppliers, including Facilities Management and IT Support, to meet the adjustment and accessibility related performance standards, which enable the 'end to end service' to deliver promptly and effectively.*
- *The impact of the service is routinely documented, including the cost benefit associated with reducing absenteeism, enhancing productivity and employee engagement, reducing management and legal costs associated with grievances and litigation.*
- *Adjustments are clearly positioned as a managerial, not a medical, responsibility: medical interventions are kept to a minimum.*

The following box highlights efforts undertaken by Lloyds Banking Group (LGB) between 2010-2014. It is an example of how one company made advancements in the provision of RA through targeted research and by incorporating many of the good practices mentioned above.

The case of Lloyds Banking Group (LGB)

In 2014, Business Disability Forum (BDF) published a case study on Lloyds Banking Group (LGB) outlining how they underwent a fundamental transformation to ensure their working environment best met the needs of all their employees. In doing so, LBG demonstrated that being 'disability smart' also means being 'business smart'.

According to BDF, LBG reengineered their ad hoc 'reasonable adjustment process' to create a carefully designed 'workplace adjustment service.' There was a change of ethos to supporting employees to meet their needs and to optimize their contribution at work rather than compliance with legislation. The substantially different approach included, but was not limited to: appointing a business manager as process owner (not HR or occupational health); centralizing funding; empowering colleagues to self-refer, removing the reliance on a line manager to initiate a request; establishing a single, well publicized point of entry staffed by experienced people and geared to provide adjustments as 'straight through orders' when possible, thus eliminating unnecessary assessments; creating a catalogue of

pre-approved IT and other physical adjustments; creating a policy on non-physical adjustments to improve understanding among colleagues managers and assessors what is possible and 'reasonable;' and ensuring effective management accountability for speed and effectiveness of the entire end to end process.

Over the course of four years (2010-2014) LGB saw:

- The average assessment and service cost decrease from £750 to £500, which is a decrease of 34 per cent.*
- The average case cost dropped from £1500 to £700, a decrease of 53 per cent.*
- The numbers needing formal assessments after triage (now known as initial consultation or first contact) dropped from 80 per cent to 43 per cent in 3 months following a process improvement change in December 2013, generating cost savings of more than £125,000.*
- 62 per cent of colleagues (and 63 per cent of their managers) using the service reported a reduction in absence levels. For every day where sickness absence was reduced among the cohort that benefited from the workplace adjustment service, there was a productivity gain of £1,193,000.*
- 85 per cent of employees using the service reported a significant improvement in performance, while 77 per cent of line managers using the service reported a dramatic improvement in performance.*
- 100 per cent of line managers and colleagues using the service would tell any company to do the same.*
- Average case duration was reduced from 2-6 months in 2009 to 14 days as of September 2014.*

How relevant is the fund within the organization and how coherent is it with other related tools and policies?

Finding #4: Internal coherence

The RA Fund complements other internal funds and accessibility mechanisms, creating a more comprehensive approach to promote an inclusive environment for persons with disabilities. Nevertheless, coherence among these systems is unclear and should be streamlined.

While the RA Fund is the only mechanism in UNICEF that provides funding for reasonable accommodations with a cost element for applicants and employees with disabilities, it is complementary to the Greening and Accessibility Fund, and the newly established Global Accessibility Helpdesk (covering both digital and physical accessibility).

The Fund also complements UNICEF's Flexible Work Arrangements (FWA) Procedure. FWA is a common type of reasonable accommodation. However, since it does not have a cost, FWA is not considered part of UNICEF's RA Fund and was therefore not considered as part of this evaluation.

The Greening and Accessibility Fund was launched in 2016 to support country offices in implementing greening and accessibility projects that contribute to reducing the environmental impact and improving the physical accessibility of offices/physical premises. The Global Accessibility Helpdesk was launched in 2023 to support UNICEF to become more accessible in the digital and physical environments.

While the accessibility of physical premises and digital environments are addressed as stated above, there is a notable gap in terms of expectations as to when and how UNICEF meetings and events are made accessible (e.g., provide sign language or CART⁸⁴ services). This is evident in the apparent case-by-case approval and allocation of some RA Fund money to make meetings accessible (e.g., Disability Connect meetings),⁸⁵ when these costs should be mainstreamed in the organization (e.g., the section or employee resource group hosting the meeting should allocate the appropriate funding). The inaccessibility of internal and external documents leads some persons with disabilities to request additional RA funding to cover the hours of a personal assistant.

For some employees with disabilities, the FWA procedure, which is a common type of accommodation for persons with disabilities, was not functioning as intended. About half of the employees with disabilities interviewed reported negative experiences when making requests and, in some cases, managers refusing to agree to what the employee requested because they did not understand how the disability impacted the employee's job functioning. Without a clear mechanism in place to raise issues, interviewees said they felt isolated when an issue developed with their manager. More specifically, employees without apparent disabilities noted during interviews how frustrating it was when they requested FWA because they were asked to disclose extensive details about their disability to justify the request, and even then, the full request may not have been granted. To clarify, the standard FWA process does not require a staff member to disclose the reasons for a request, but in these cases the manager felt the requests were above the permitted amount and thus requested more details on their disability.

When triangulating interviews conducted at the global, regional and country office levels, there appears to be a difference between how FWA are approved in HQNY and what is approved in the field (country and regional offices), with the latter often being less flexible. Part of this may be because of the type of work, for example some positions require more in-person interactions with external counterparts. However, interviews also showed a common trend where, outside HQ, there appears to be still less acceptance of disability and limited reliance on an individual's knowledge of what is best for them.

It is still unclear how the RA Fund aligns with and/or complements the organization's approach to occupational health and procedures related to sick leave, disability allowance, the process to determine disability pension, mobility and hardship, rotation procedures, and compensation for service-incurred accidents, as well as organization-wide mental health strategies. More research would be necessary to assess the exact nature of measures needed to facilitate the full alignment and simplification required.

⁸⁴ CART stands for 'Communication Access Real-Time Translation' and is most easily described as subtitles for live discussions. Spoken language is translated instantaneously into text and displayed in various forms such as on a computer.

⁸⁵ Examples of approved RA Fund requests that covered costs associated with meeting accessibility (e.g., sign language, captioning):

- US\$9,900 was approved to cover the cost of sign language interpretation for meetings in 2021. OED intern made this request; however, no details are available on which meetings it covered.
- US\$9,995 was approved in November 2020 to cover captioning for meetings organized by OED, UNICEF Board, DOC, DHR and Disability Connect in 2021.
- US\$9,995 was approved in November 2020 to cover sign language interpretation for global meetings organized by OED, UNICEF board, DHR and DOC in 2021.
- US\$9,203 was approved for CART service for five Disability Connect meetings in 2022.
- US\$20,000 was approved to cover the cost of sign language and CART for events facilitated and co-facilitated by the Disability Team in HQNY between April and December 2022.

Finding #5: Coherence between the RA Fund and UN Medical

When looking at the broader policy context, there appears to be no link between the responsibilities of the RA Fund, occupational health and safety, and UN Medical, meaning they operate in silos.

According to some interviewees, the lack of coordination between the RA Fund and UN Medical resulted in potential violations of reasonable accommodation when an employee with an existing or newly acquired disability was denied a posting, without any consideration of whether a reasonable accommodation would have allowed them to do the essential functions of the job. Four employees with disabilities interviewed mentioned that they were not approved for new posts in other countries because of their disabilities, while they believed they could have worked in those posts with RA. At present, UN Medical does not regularly need to consult or coordinate with the RA Fund in the interests of the employee.

“The medical clearance process and the RA Fund don’t mix well.”

UNICEF Employee with Disability

To what extent is the Fund’s model clearly and consistently defined, organized and communicated?

Finding #6: On access to and understanding of information about the RA Fund

Information about the RA Fund is presented consistently in key internal documents that are fairly easy to find. However, the level of understanding of disability and reasonable accommodation, including what it is and who can request it, varies widely across the organization. Processes related to the recruitment and onboarding of new employees appear to provide limited or inconsistent information on reasonable accommodation.

The document review showed that information about the RA Fund and who can apply is presented consistently in relevant internal documents, including the Guide for Reasonable Accommodation Requests, the Inclusive Employment Guide, and the Procedure on Disability-Inclusive Human Resources Management.

However, there are major differences in the understanding of what constitutes disability and reasonable accommodation, including what it is and who can request it. In all 16 key informant interviews with employees with disabilities and more than 20 interviews with UNICEF staff administering RA or related policies or processes, there was a wide variation in the understanding of what constitutes disability and RA. For example, some staff believe RA is for employees with short-term and temporary disabilities, while others think it is only for employees with longer-term disabilities. Other employees with disabilities simply do not know what RA would be helpful, either because their disability is more recent, or because they have never worked for the UN. Another area with broad variations in understanding is whether individuals with mental health conditions are eligible for temporary and/or long-term RA.

“I actually still don’t know what [the RA Fund] can do for me, because I haven’t fully recovered.”

UNICEF Employee with Disability

While the current RA Fund guidance states that RA is for persons with disabilities as conceptualized in the CRPD, some employees with disabilities did not understand whether they were eligible in relation to their impairment or employment status, or due to a lack of understanding about the rights-based approach to disability⁸⁶ as outlined in the CRPD.

For example, one employee with an obvious disability found out about the RA Fund when information about this evaluation was emailed to the Disability Connect network. After going through the information provided on the dedicated SharePoint site about the RA Fund, they were still unsure if they were eligible, especially as they had been hired as a consultant. Another individual interviewed only needed some additional equipment that would not cost much, but was reluctant to request the items because their contract extension was not guaranteed, and they were afraid that the additional costs of the equipment could affect the possibility of another contract in the future.

The evaluation team also noted that there appears to be limited information about reasonable accommodation and Disability Connect provided as part of the onboarding process for new staff with disabilities. Despite the online onboarding portal having information on RA, at least five staff interviewed mentioned that they could not easily find the information. The portal briefly mentions that employees who identify as having a disability and need accommodations that require financial resources for their work tasks can submit a request for RA. It also provides a link to another document that has more details on how to apply and an email address for any questions. Despite information about RA being part of the GSSC personalized onboarding portal, HR staff interviewed, including high-level representatives from HQ in New York, were unaware of the material.

The evaluation team also found that there is a lack of distinct messaging about RA on [UNICEF’s career website](#) and inconsistent messaging on RA in recruitment and job descriptions/Terms of Reference (TORs). This is complicated by the fact that the writing and approving of the TORs is done at the hiring office’s level.

The online form to apply for UNICEF’s Disability Inclusion Consultancy Roster lays out how the CRPD defines persons with disabilities and then asks the person if they identify as a person with disability according to the definition. While it is appropriate that the question is optional, this approach also assumes that the CRPD definition is easily understandable by applicants with disabilities, which is not always the case.

There does not appear to be consistent information on RA in the recruitment and onboarding of consultants and interns and there does not appear to be a system for tracking or benchmarking recruitment activities and accommodations during the recruitment phase.

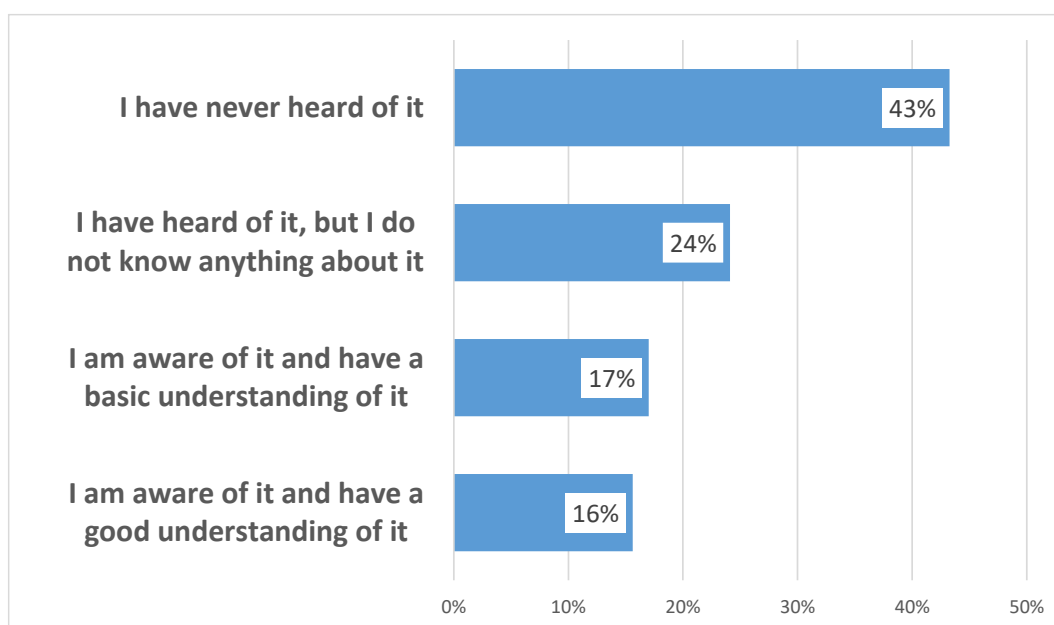
⁸⁶ More information on the medical, social, and human rights models of disability is provided in the [glossary](#).

Finding #7: On internal awareness of the RA Fund

There is limited awareness of the RA Fund internally at all levels, despite dissemination mechanisms such as SharePoint sites, webinars and training.

In the Global Staff Survey in 2022, only 34 per cent of survey respondents (approximately 5,000 of the 14,747 employees who filled out the survey) said they knew about the RA Fund.⁸⁷ The online survey for employees with disabilities conducted as part of this evaluation showed that a stark majority of colleagues who completed the survey did not know what the Fund is or what it offers (see Figure 4).

Figure 4. 'What is your level of awareness of the Reasonable Accommodation Fund?'
(online survey responses, n=141)

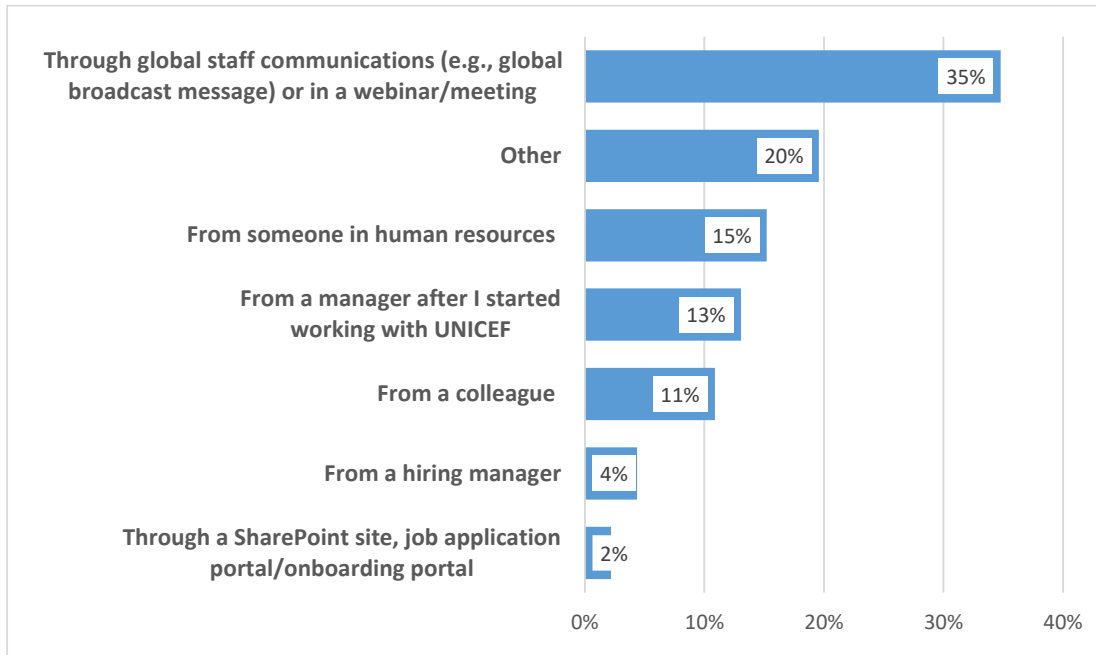


While there are two detailed dedicated sites on RA on UNICEF's intranet/SharePoint site (one from [Diversity & Inclusion](#); [DHR](#)), just over half (57 per cent, or 26 out of 46 respondents) of the employees with disabilities that answered the relevant question in the online evaluation survey said they knew there was a dedicated SharePoint site; and 24 per cent (11 out of 46 respondents) said they had visited the site.

The online survey also indicated the most common way employees with disabilities heard about the Fund was through global staff communications, followed by 'other.' and hearing about it from someone in human resources (see Figure 5).

⁸⁷ UNICEF (2022), Global Staff Survey. (Internal document)

Figure 5. ‘How did you first hear of the Reasonable Accommodation Fund?’
 (Source: online survey, n=46)



Only two people said they knew about the Fund through their hiring manager, and just one person said they were aware of it through an internal portal. However, respondents already knew about, for instance, the SharePoint site on UNICEF’s Reasonable Accommodation Fund (at least 26 people knew the site, of which 11 had visited it). Senior leadership in various key positions (e.g., UNICEF Representatives and Hiring Managers) confirmed during interviews that they did not know about the Fund until they had a staff member with disability who required RA, or before they worked at headquarters in New York.⁸⁸

“There is a huge gap between what the organization offers and what employees are aware of.”
 UNICEF Employee

“I think people are not aware [of the Fund]. I think it comes down to even HR is not aware, even though we talk about it from time to time, and it comes up in the HR sphere every now and then. But if you ask around, people don’t know. It [RA Fund] should be something that everyone is aware of, as much as for example, filing an investigation related to gender and racial discrimination.

We [UNICEF] advocated so much on that that now everyone knows what to do and feels comfortable speaking up. There should be the same awareness about RA to create a similar atmosphere where people feel comfortable speaking up.”
 UNICEF HR Colleague

“The Country and Regional Office Operations staff are not aware of the Reasonable Accommodation Fund and needs of staff members with disability. It took two months, with several follow ups to get things sorted out and the [RA] item procured.”
 UNICEF Employee with Disability

⁸⁸ An employee with an obvious disability stated in an interview that the Disability Connect email about this evaluation was the first time they had heard about the RA Fund. Therefore, the individual reached out to the evaluation team to be interviewed.

The low level of awareness, although slowly increasing, may be exacerbated by the fact that UNICEF does not have a full network of focal points in key positions, such as operations and HR, who provide support at the country office level. This is especially relevant with the adequate and timely procurement of RA. There is no standardized disability awareness training module for those most likely to manage or work with employees with disabilities and/or reasonable accommodation. There is no mandatory disability awareness training module for colleagues in HR, operations or managers, or a RA communication strategy.

In 2020, the Diversity and Inclusion Team of DHR held 12 webinars in five languages on RA in all seven regions where UNICEF works. The regular turnover of employees and the rotation of international professionals may contribute to a fading awareness of RA in UNICEF, requiring more frequent and systematic awareness raising. UNICEF does not have a mechanism to track who was trained and where they are currently working.

“Currently, it depends all on the individuals and also on the awareness of that individual if you're lucky because people are not aware and UNICEF as one of the leading organizations in the world when it comes to disability and its programming is lagging tremendously behind when it comes to looking at its inner workforce and structures.”

UNICEF HR Colleague

A lack of dedicated support for RA (e.g., disability focal points from operations or HR) at the country level and in some regional offices creates challenges for the local staff in the onboarding of persons with disabilities. For example, programme and administrative staff, who may not have knowledge about disability, were nevertheless put into a position of assisting with the onboarding of employees with disabilities, which they felt was not their responsibility.

“We are in a very unfortunate situation, because there is an assumption from UNICEF HQ, that the current Representative, the Deputy Representative and HR have the capacity to understand and help a staff member with a disability.”

UNICEF Employee with Disability

Finding #8: On the Fund’s application and decision-making process

The application and decision-making processes are mostly perceived as clear and transparent. However, there are some outstanding issues, mainly related to elements of the application form and the information provided to applicants once a decision has been made.

The results of the online survey showed a broadly positive perception about the overall process. Approximately two-thirds of respondents agreed that the application process was clear and straightforward (70 per cent agreed or strongly agreed) and that the decision-making process was transparent (65 per cent agreed or strongly agreed).

Nonetheless, interviews and a document review by the evaluation team revealed some outstanding issues with the **application process** and form including:

- *Service Gateway*, the online system where employees make RA requests, does not clearly state what RA is or who should be completing the form (e.g., an individual with

disability or a programme assistant or hiring manager filling it out on behalf of an applicant or employee). If an employee receives the direct link, they may not have all the information they need before filling out the form. While there is a helpful explanatory video on the main RA webpage on how to fill out the form, there is no link to the video on the form.

- The form uses one-word questions versus complete questions. For example, it says 'email' rather than 'What is the email address of the person completing this form?'
- For some questions, there is an option to get more information by clicking on a question mark, but that is not available for every question.
- The form asks for the total cost of the request. However, at least three staff interviewed said it was challenging to come up with costs directly upon being hired. For example, employees requesting personal assistants did not know what UNICEF pays for such services, and they did not know upfront how many hours they would need support since they had not yet started the job.
- The form also has a mandatory question asking for the name of an HR focal point. While the intention may be to identify someone that can help procure an accommodation for new staff, employees with invisible disabilities stated in interviews that it can be frightening to have to speak with someone in the office about their disability and ask them to be the focal point for their request. Concerns mentioned include: 1) "I don't want to be seen as a bother," 2) what if the HR focal point does not think the employee should get the accommodation, 3) what if the HR focal point shares the employee's personal or medical information with other colleagues in HR, and 4) what if the employee with disability is treated negatively, as others in the office had been treated when they disclosed their disability.⁸⁹

Based on interviews and a review of related documents, the evaluation team found that there is a straightforward and transparent **decision-making process** for requests under US\$2,500 (also considered for fast-track approvals) and for requests over US\$2,500 that must be reviewed by the Reasonable Accommodation Committee (RA Committee) established in 2020.

The current makeup of the RA Committee includes representatives from the Disability Team in Programme Group, Disability Connect, and the Culture and Diversity Team in OED. The fact that the Committee also includes representatives of Disability Connect may lead to potential conflicts of interest. Interviews with multiple private sector companies indicated that employee resource groups, such as Disability Connect, need to operate in an advisory and peer-to-peer capacity. Since the Disability Connect co-chairs are part of the RA Committee that makes decisions about costed accommodations, they are potentially put in a position of having to both advise and then decide on requests for accommodation.

⁸⁹ The evaluation was able to confirm that in some cases, employees knew what accommodation they needed, but did not want to have to explain their disability to someone in HR. They figured they could provide relevant documentation directly to the RA Fund Administrators for their review. Since the question about the HR focal point is a mandatory field, and the employee might not feel comfortable telling HR about their disability, especially after seeing how other people in the office were treated, they will have to include their name as the HR focal point, exposing people to other issues with the process later on. One interviewee shared their experience as follows: "I remember I was going through the procedures on SharePoint, and I did not expect to have to include the name of an HR focal point. Although I openly disclosed that I have a disability in the interview, I didn't want to go around the office saying, 'Hey guys, I'm here. You know, I need this.' That was not my intention."

Service Gateway generates a notification of the decision (i.e., approval, referred to another unit or denial) to the requester. Often the administrator is in direct contact with the requester before and after a decision is made (especially if the request was not approved). However, there is no evidence that requesters are informed about the decision with a corresponding explanation in writing, which is deemed necessary from UNICEF's legal team, also to initiate a timeframe by which the requester could file a complaint.

What have been the main results achieved so far?

Finding #9: On requests to the RA Fund⁹⁰

The RA Fund has been effective in the provision of low- and high-cost accommodations, regardless of employee category or geographic region.

Based on available information regarding requests made to the RA Fund between 2020-2022,⁹¹ 90 per cent of all requests were approved⁹² and those not approved were declined because they were considered within the scope of broader occupational health measures. In those cases, the Fund Administrator advised the staff member to reach out to other relevant divisions (e.g., ICTD, DFAM) or health insurance.

In early 2020, there was a six-fold increase in the RA Fund, from US\$50,000 to US\$300,000. As a result, between January and December 2020, UNICEF was able to support 11 RA requests for different purposes (some individual requests and some to address organization objectives). This included requests from six individuals for individual accommodations and five requests that enhanced the accessibility of meetings and events at the regional and global levels. Such requests could be considered beyond the function of the RA Fund, as they involve a broader accessibility issue. The increase in funding fortunately happened in conjunction with a positive increase (60 per cent) in the number of recipients of the RA Fund.

Forty-six requests were approved between September 2021 and December 2022, with one case in which the request was partially approved. Four of the requests covered costs of sign language and CART for UNICEF meetings, including Disability Connect. In one case, the applicant withdrew the request because they did not have a disability. Five requests were rejected as they were deemed not within the scope of the RA Fund and in all these cases the RA Fund Administrator followed up with the employees.⁹³

Data showed that 28 of the 51 requests made between September 2021 and December 2022 through the online portal were for more than US\$2,500 and should have been reviewed by the RA Committee (the evaluation team was not able to verify if this happened in all instances).

⁹⁰ As previously noted, this report presents findings based on information available regarding requests between 2011-2019 submitted via email to a focal point in DHR, from January to December 2021 submitted to a dedicated consultant working for DHR, and from September 2021 to December 2022 submitted through an online form via SharePoint.

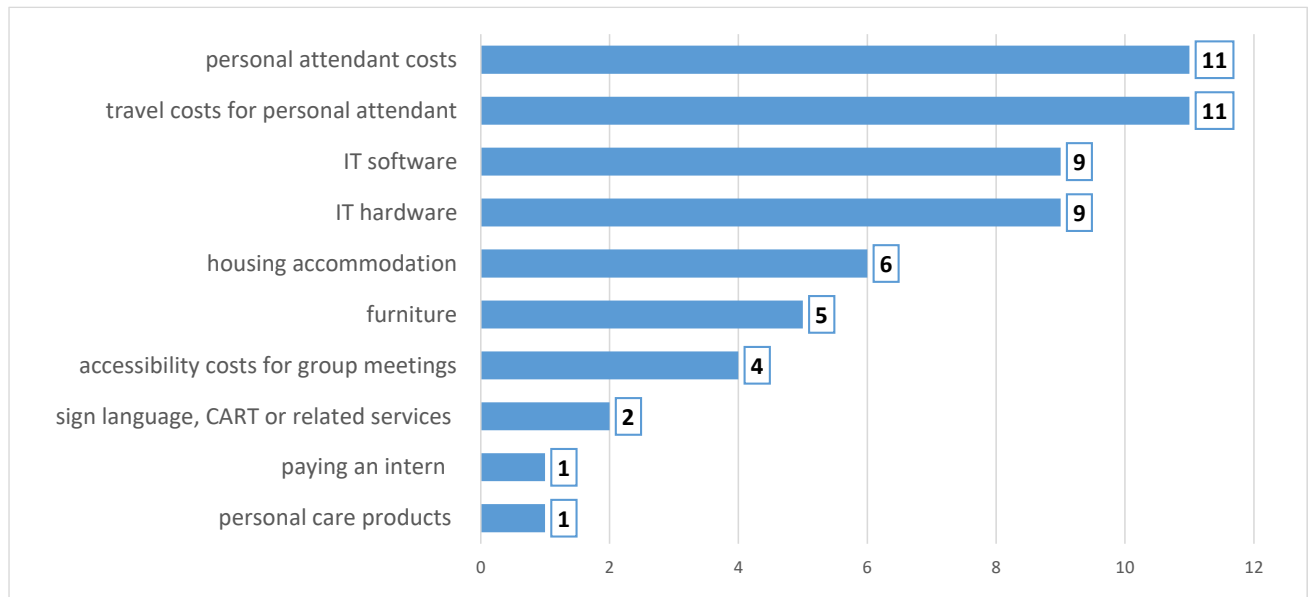
⁹¹ This covers January to December 2020 and September 2021 to December 2022.

⁹² Forty-six out of 51 requests were approved between 2020 and 2022

⁹³ Three of the requests pertained to the provision of ergonomic furniture, which were submitted by individuals with short-term or temporary conditions (such as back pain). The offices where they worked already had the provisioning of ergonomic desks, so the RA Fund Administrator made calls and sent follow-up emails to the HR focal points in those offices to ask them to prioritize the provision for the requesters. The fourth case entailed the provision of an alternate mouse and keyboard. The employee was referred to IT for provisioning. The fifth request denied involved a replacement part for a medical device. According to the Culture and Diversity team, the employee was advised to check with the health insurance to cover the costs, and should it not be covered, to revert to the RA Fund.

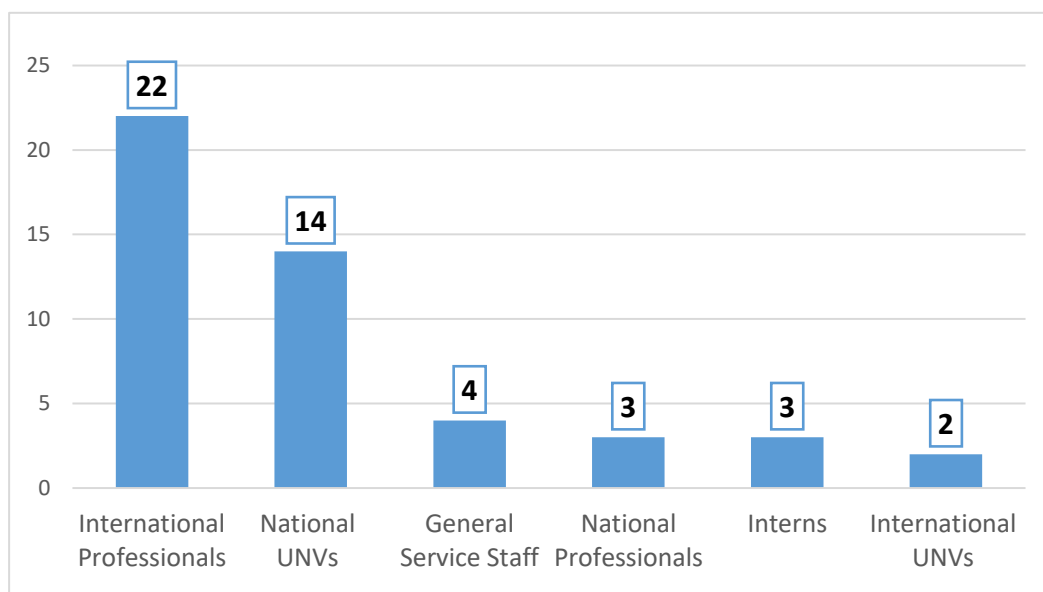
Available data on RA Fund expenditures between 2011 and 2022 shows that the majority of funds were used for personal assistants, either to provide support in the work environment or to accompany employees with disabilities on travel. Figure 6 shows this more specifically for September 2021 to December 2022. The largest number of requests were for costs related to personal attendants, followed by assistive software and hardware.

Figure 6. Breakdown of requests by type, from September 2021 to December 2022⁹⁴
 (Source: internal data on RA Fund requests, n=59)



Between 2021-2022, the personnel category with the largest number of requests was overwhelmingly international professionals, followed by national UNVs, general service staff, national professionals, interns, and international UNVs (see Figure 7).

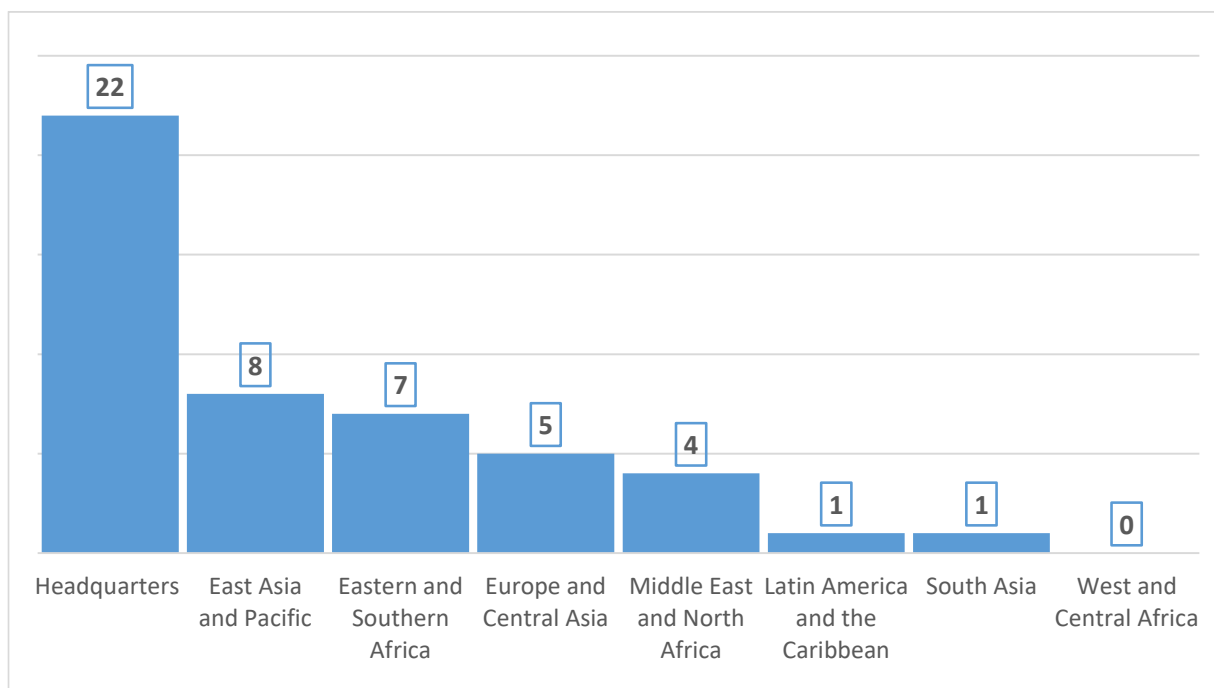
Figure 7. Requests by personnel category
 (Source: internal data on RA Fund requests, n=48)



⁹⁴ These numbers do not represent the number of individuals that made requests as some individuals requested more than one item.

When disaggregated by the region where the request came from (see Figure 8), between 2021-2022, most of the approved requests came from headquarters, followed by requests from East Asia and the Pacific Region, Eastern and Southern Africa Region, Europe and Central Asia Region, Middle East and North Africa Region, Latin America and the Caribbean Region, and South Asia Region.

Figure 8. Total of requests, by origin site⁹⁵
 (Source: internal data on RA Fund requests, n=48)



Finding #10: Perceived usefulness of the RA Fund and accommodations

Overall, users consulted felt that the RA Fund is helpful and that the RA Fund Administrators are supportive.

“Very happy that this Fund was created. I had needed the accommodation and prior to the Fund it was going to be difficult if not impossible to get the needed accommodation/support. The Fund addressed all of this and helped make work life much more comfortable and helped ensure I could be productive throughout. Without the accommodation, I would have continued to be in pain.”

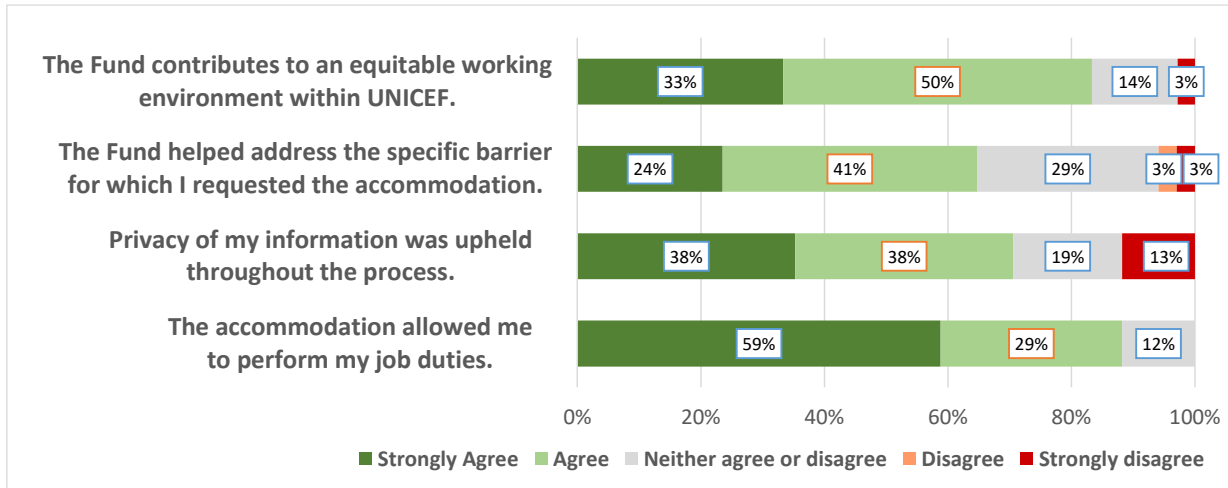
UNICEF Employee with Disability

The survey respondents rated the effectiveness of the Fund as satisfactory overall (see Figure 9). Eighty-three per cent of respondents agreed or strongly agreed that the Fund contributes to an equitable working environment within the organization. Sixty-five per cent agreed that the Fund helped address the specific barrier for which they requested the accommodation. Most users of the Fund (76 per cent) considered that privacy was respected, and approximately two thirds (65 per cent) viewed the Fund as an effective way to address barriers in accessing accommodations. The vast majority (88 per cent) felt that the accommodation provided allowed them to perform their job duties.

⁹⁵ Note again that these numbers do not represent the number of individuals that made requests as some individuals requested more than one item.

Figure 9. Perception of the Fund regarding effectiveness and privacy

(Source: online survey)



Interviews conducted confirmed this positive picture. The majority of employees with disabilities interviewed found the fund administration helpful in clarifying what the Fund would cover and how to apply.

“The colleagues from the diversity and inclusion unit are very supportive; they take the time to explain the possibilities of support to the staff concerned (material, financial or psychological) and to guide them. The staff really feels confident and supported after discussion with them.”
 UNICEF Employee with Disability

Finding #11: On processing requests

The time taken by the RA Fund to process requests is, for the most part, in line with the international best practice standard of 20 days or less. Yet, in approximately one-quarter of all RA requests processed, it took considerably longer to procure and have the RA in place.

The current RA Fund criteria for the approval or denial of an accommodation request considers whether the request is required for the employee to perform essential job functions or would impose a disproportionate or undue hardship/burden (in other words, requiring excessive resources), as addressed in General Comment 6 of the Convention on the Rights of Persons with Disabilities.⁹⁶

As mentioned in the [glossary](#), ‘undue hardship’ means significant difficulty or expense and focuses on the resources and circumstances of the employer in relation to the cost or difficulty of providing a specific accommodation. Undue hardship refers not only to financial difficulty but to reasonable accommodations that are unduly extensive, substantial, or disruptive, or those that would fundamentally alter the nature or operation of the business. An employer must assess on a case-by-case basis whether a particular reasonable accommodation would cause undue hardship.⁹⁷

⁹⁶ CRPD (2018), [General comment No.6 on equality and non-discrimination](#)

⁹⁷ U.S. Equal Employment Opportunity Commission (2002), [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#)

UNICEF says it tracks the time it takes to approve or deny a request for RA through Service Gateway. However, the evaluation team was not provided with those details. The actual time for an individual to receive the accommodation is not closely monitored. Twenty days is considered as the international best practice standard among RA experts.⁹⁸ In interviews with 16 RA Fund users, about half of them stated that a decision on their request was taken in less than 20 days. For the other half it appeared to require longer time frames, which did not appear to be entirely because they were more complicated requests. Three users interviewed said they had to wait two to four months to receive their accommodations. The evaluation team identified at least two requests that were not complicated cases and thus could have been fulfilled in less time. One case involved the hiring of a personal assistant (PA), which typically takes more than 20 days to hire, but should not take three to four months. The long wait for a PA meant the employee had to perform their job duties for three to four months without the appropriate support.

The RA Fund covered all reasonable accommodation costs for UNVs with disabilities that were recruited and placed by UNICEF, including those part of the UNV Fully Funded programme (i.e., a dedicated programme to recruit and place UNVs with disabilities paid 100 per cent by donor countries). Donors of the fully funded programme earmarked US\$5,000 for each UNV with disability placed to assist with RA costs. UNV received the money from the donors. However, based on information obtained during the evaluation team's interviews, it appears UNICEF did not request, or thus receive, the money. It appears that in 2022, for example, when UNICEF placed 19 UNVs with disabilities as part of this programme, UNICEF could have received US\$95,000 to put towards reasonable accommodation.

Finding #12: On procurement

Once a request is approved, there appears to be a lack of consistency in how an accommodation is provided or procured, which has resulted in cases where requestors have been left to navigate the system with little to no support. There were also instances where employees were asked to provide personal and medical information which was later shared among the office colleagues, which is against employee's rights to privacy and a breach in confidentiality.

At least six staff interviewed reported they were required to provide medical proof or details of their disability at the local office level in order to receive the requested accommodation. They reported having their personal and medical information shared via email to other colleagues in the office without their permission during the procurement process, which is against employee's rights to privacy and a breach in confidentiality.

The RA request database and interviews showed inconsistencies in the procedures for the procurement of accommodations - notably how items were procured, by what office or who within the office gets involved - and as a result people with the same type of request had differing experiences and outcomes. UNICEF does not have a written operating procedure on how to procure accommodations (all types, including the hiring of PAs), who should be involved, who should have access to confidential information, and appropriate follow up.

⁹⁸ The US Government, for instance, calls for requests for reasonable accommodations to be processed and a decision made to approve or deny within 20 business days of the initial request, unless there are extenuating circumstances warranting extensions of time frames and/or additional medical documentation needed. See EPA (2023), [Frequent Questions about Reasonable Accommodation](#)

For example, staff that requested the same accommodation (e.g., noise cancelling headphones) had differing experiences in procuring the item depending on the office and circumstances. For the same item, the procurement of the item would in some cases be handled by a programme assistant and in others it was an HR focal point or IT specialist. In some cases, the person requesting the accommodation also needed to defend and reveal to a local procurement colleague or supervisor the reason they could not use the standard item, for example, the regularly provided headphones or the standard office chair on wheels.

“I would like to [share information about my disability and accommodations] on my terms... often people see my wheelchair and they don't see or think about anything else. It's not like some big secret that I'm a wheelchair user, but I don't want to go into detail about everything with everyone all the time. I just don't really think that's necessary. It is not comfortable.”

UNICEF Employee with Disability

In a few cases, the lack of a clear point of contact for procurement of accommodations led to breaches in confidentiality of personal information for users. In other cases, in which employees with disabilities requested accommodations directly from their managers, they had long wait times (cited by four employees with disabilities interviewed). There was at least one case prior to 2020 where the request took more than six months to process, so the employee left the office before a decision was made.⁹⁹ In addition to inconsistencies in procuring an item, at least four RA users interviewed were told to purchase the accommodation and be reimbursed. In one case it was for travel costs for a personal assistant, which was quite expensive.¹⁰⁰ In all four cases, the employee was not comfortable with the arrangement but felt there was no other option to get the accommodation.

In some cases where the Fund felt (rightly so) that it was another office's responsibility, they directed the requestor to ask for it themselves, and even after it was agreed by the RA Fund that it was something the requestor could use, the requestor was told to buy it and seek reimbursement. In the cases where the RA Fund Administrator informed requesters they should get the accommodation from another department or health insurance (with support provided by the RA Fund), the requesters had to spend considerable time advocating with the new section or health insurance for the accommodation, thus duplicating their efforts.¹⁰¹

⁹⁹ A request was made by an employee with a non-visible disability in late 2018/early 2019 to have additional microphones installed in an office conference room. What was a simple request was passed around to different departments. The primary question was who should pay for them. After more than 10 months, the employee rotated to another office and the request was not made for that individual.

¹⁰⁰ Personal assistants for employees with disabilities are hired on consultancy contracts in UNICEF. According to the internal procedure for consultants, the cost for all their anticipated duty travel must be included in the total contract value. For unanticipated travel, where specific travel requirements are unclear or subject to change at the time of contracting, offices may choose to include general travel requirements in the terms of reference, in which case the actual travel costs will be covered separately by UNICEF and not included in the lump sum fee. In such cases, consultants need to make their own travel arrangements and will be reimbursed for travel costs and subsistence allowance. It was reported that further policy guidance for personal assistants for persons with disabilities, including in relation to unanticipated travel, is being explored. In the meantime, when a dedicated travel support request for personal assistants for mission-related personal assistance has been submitted to the RA Fund, RA administrators have asked offices to consider paying for the travel in advance as an exception.

¹⁰¹ For example, one individual needed a stationary chair that was not on wheels like the typical one at UNICEF provides. They were told it would not be covered by the RA Fund and they should get it from DFAM. When they approached DFAM, they had to repeatedly explain why they needed a replacement for the standard item and what their disability was, even if it was apparent. In the end, the chair arrived but was delivered to the wrong location, and the requestor was never informed of its arrival.

Nine RA Fund users interviewed mentioned that irrespective of the cost and whether the accommodation was covered by the Fund, there was a lack of standard procedure for follow-up from the RA Fund Administrators with the local office on procurement and delivery of the accommodation.

While there is a sample TOR for PAs in the organization, there is no standard operating procedure for hiring PAs and what rates to pay them. PAs that are not on contract with the organization for regular work were not compensated for the time they assisted an employee while travelling. In those cases, PAs only received Daily Subsistence Allowance (DSA). In some cases, they received the full DSA and in other cases only partial, depending on whether they were sharing a room with the employee they were assisting. It was confirmed through interviews with employees with disabilities and the RA Fund Administrators that UNICEF has not paid for the time PAs work while travelling, which is common practice among the private and public sectors.

Furniture, equipment, software, or hardware that replaces a commonly used item (e.g., noise cancelling headphones) are being considered as a reasonable accommodation or 'special' and are using RA funds, when they could be considered a replacement for standard equipment provided to employees, without repeatedly discussing why they needed the specific equipment, even though their disability was obvious. Any request that is treated as 'special' or out of the ordinary, when it is an accommodation for the person to do essential functions of their job, cannot be considered inclusion. A substitution test (see box below) should be applied because people who use regular type desks do not need to ask for them. It is expected and accepted that they need them to carry out their job.

Substitution Inclusion Strategy

After receiving a request, a RA Office will use a substitution test to determine whether something being requested is merely an item that replaces something a non-disabled person would receive routinely without special treatment.

As such, the substitution construct recognizes that employees routinely receive a variety of IT equipment such as keyboards, a mouse, headphones, monitors, dictation software, etc. Hence, any requested item that is in place of those that will allow an employee with disability to carry out the essential job function will be approved by the RA Office but will be paid for by the employee's office. The same construct will apply to office furniture because a standing desk is just a substitute for a regular desk, an ergonomic chair for a standard office chair, etc. Equally, all software that the requestor needs to do their job will be approved but paid for by the unit.

The RA Office will consider a request as auxiliary only when it exceeds the test of substituting for usually provided goods or services, such as the need to pay for a PA. In addition, while IT should pay for most software because it is a substitution, exceptions could be made where the RA Office pays because the equipment is supplementary. One example is eye-tracking (also called eye gaze) software that allows a person with little functional use of their hands or voice to use their computer.

In the operationalization of reasonable accommodation, the evaluation team also found at least six reports from employees that personal, health and rehabilitation information was shared at the local office level without the employee's consent, which is not in alignment with

CRPD Article 22 on Respect for Privacy¹⁰² and the UN System Chief Executives Board for Coordination Personal Data Protection and Privacy policy. Privacy of information appeared to be upheld by the RA Fund Administrators. The breaches of confidentiality happened at the local level once the approved RA request was to be procured or when RA, such as flexible work arrangements, was requested.¹⁰³

Finding #13: On access to assistive technologies

Despite the existence of a long-term agreement with a company to provide assistive technology to staff with disabilities, and a catalogue of options, there is very little awareness of this beyond UNICEF's Supply Division. Furthermore, UNICEF does not have a standard operating procedure for subscription-based assistive software.

Even though all related requests for screen reading software¹⁰⁴ and speech to text software¹⁰⁵ were provided, UNICEF does not have a standard operating procedure for subscription-based assistive software. There is a long-term agreement with a company to provide assistive technologies to employees with disabilities and a catalogue of options, but there is practically no awareness of this beyond Supply Division.¹⁰⁶

Some users even mentioned in interviews that obtaining the license for screen reading software was challenging. They said it took extensive time and energy to figure out with their programme assistant (or equivalent) if they should purchase an individual license or if UNICEF had a group license, and the best way to pay for it. Licenses were purchased on an individual basis and required a credit card. It is not clear if there is a possibility for UNICEF to get reduced rates for licenses if more than one person at UNICEF has a license.

Finding #14: Concerns with the RA Fund

The main concerns shared by RA Fund users were related to a lack of understanding about RA among colleagues outside the Fund's Administration, which led to the inappropriate sharing of personal and medical information. Users also expressed concerns about the lack of a clearly articulated complaint process.

Approximately half of the employees with disabilities interviewed (9 of 16) stated that confidential information about their disability was shared inappropriately in the local office due to a lack of understanding about RA and disability at the local level among HR, Operations, IT and programme assistants. This does not conform with CRPD Article 22 on Respect for Privacy and plays a role in whether some staff feel comfortable requesting RA, as noted further below (see also Figure 9 above).

Approximately half of the 16 employees interviewed stated they did not know where to report issues with the process, as there was no clear feedback loop or formal complaint mechanism. The evaluation team confirmed the lack of systems in place through interviews with the RA

¹⁰² CRPD, [Article 22 - Respect For Privacy](#)

¹⁰³ It should be noted that flexible working arrangements do not fall within the scope of the Fund. However, these examples were emphasized by interviewees in the wider context of reasonable accommodation.

¹⁰⁴ There were a total of six requests to the RA Fund between 2020-2022 for screen reading software.

¹⁰⁵ There were a total of five requests to the RA Fund between 2020-2022 for speech to text software (e.g., Otter.ai, Dragon).

¹⁰⁶ The catalogue is available to view at UNICEF Assistive Technology Catalogue for Employees with Disabilities, and there is also an [Accessibility Centre](#) at UN Headquarters in New York (in the basement of the UN Secretariat's main building) which could be helpful for local employees to try out assistive information and communication technology.

Fund Administration and other colleagues from human resources and legal affairs within the organization.¹⁰⁷

Finding #15: Who makes more requests and why

Employees with more apparent disabilities made more requests to the RA Fund, which is expected based on the types of impairments that are more visible and the types of accommodations they may request. Employees who could potentially benefit from RA with and without a cost and chose not to request accommodation(s) did so because they were unsure whether they qualified. Other employees simply did not know what they needed in terms of RA.

Based on the RA Fund data from 2020-2022, people with more apparent or visible disabilities (e.g., persons that use mobility devices such as wheelchairs or who are clearly blind because they use a white cane or have a guide) made more requests with a cost, which is expected.¹⁰⁸ This is due to the fact that persons with mobility and sensory impairments need more costed accommodations.

In contrast, interviews confirmed what research shows, that people with non-visible disabilities have concerns over requesting accommodations due to disbelief, stigma, or confidentiality,¹⁰⁹ although their requests have little or no cost on average. According to the 2021 National Disability Survey in the UK, “lack of understanding and stigma from others creates consistent barriers in the lives of people with invisible disabilities.”¹¹⁰ “Those with invisible disabilities may also experience attitudes of disregard and disbelief because they defy stereotypes of what people perceive disability to look like.”¹¹¹ According to Santuzzi et al., “Disclosure may open an employee to cruel behaviour from peers based on stigma or a false belief that accommodations are an attempt to receive unneeded special treatment.”¹¹²

Employees with disabilities who could benefit from RA stated in interviews that they did not make requests because of one or more of the following reasons: i) they did not know the fund existed; ii) they did not know how the fund could help them; iii) they did not know whether they were eligible; iv) they did not know what accommodations they needed; or v) they were concerned that it might negatively affect their likelihood of getting another contract with the organization.

¹⁰⁷ Formally UNICEF has a ‘complaint mechanism’ that exists for any decision in the organization through what is called a ‘management evaluation.’. However, interviewees were not aware of this and instead a simpler and dedicated process for appealing RA requests would be appropriate. A document outlining the procedure of a management evaluation is available on the organization’s intranet (UNICEF, 2020, UNICEF Procedure on Appeals).

¹⁰⁸ In 2020, it appears four of six approved requests were from individuals with more visible disabilities. In 2021-2022, 26 of 42 approved requests were from individuals with more visible disabilities. Some were repeat requests (12 individuals made the 26 requests). If the assumptions about whether the disability is visible based on the information provided in the requests is accurate, then this is more than the number of individuals with non-visible disabilities that made and received requests.

¹⁰⁹ See for example: Chronic Illness Inclusion UK et al. (2021). [Removing societal barriers for disabled people with energy-limiting conditions.](#); Hidden Disabilities Sunflower (2023), [What is a hidden disability?](#); Santuzzi, A. M. et al. (2014). [Invisible disabilities: Unique challenges for employees and organizations.](#) Industrial and Organizational Psychology, Vol 7, p. 204–219.

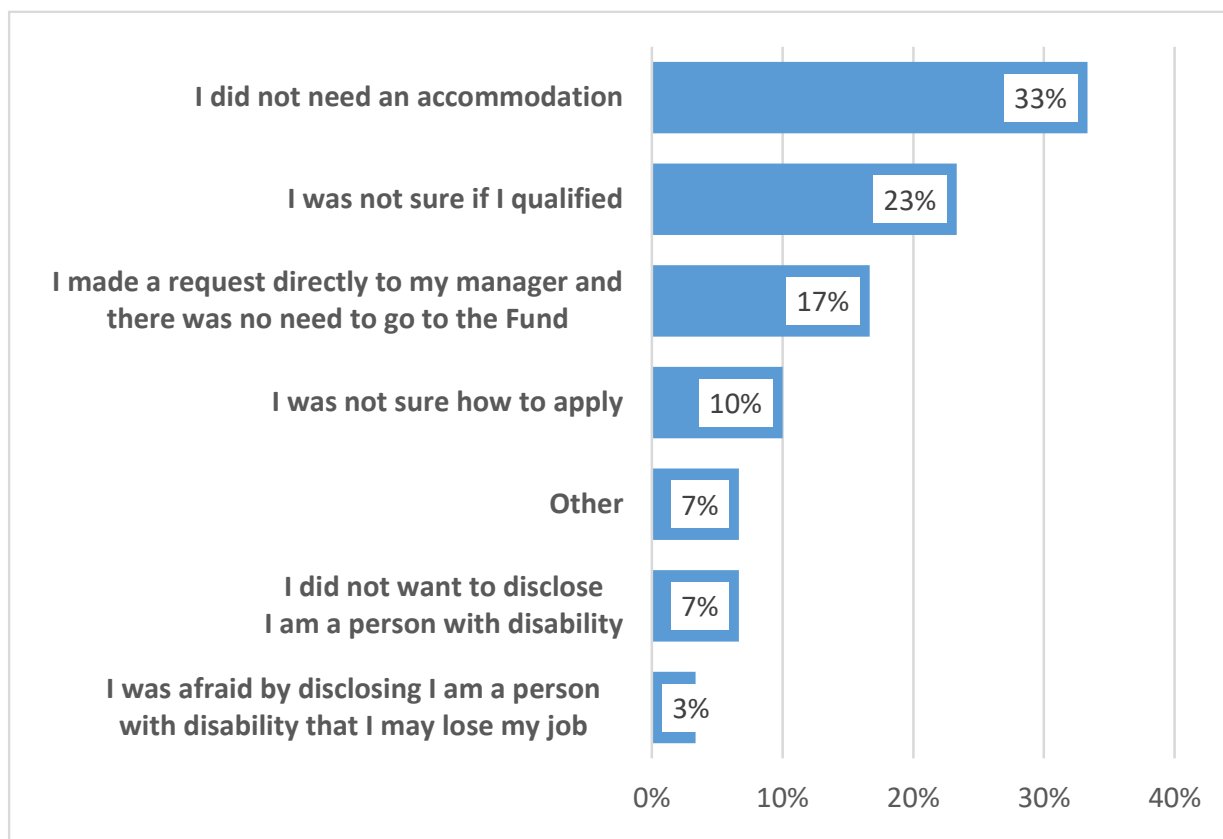
¹¹⁰ Disability Unit (2021). [UK Disability Survey research report](#), June 2021.

¹¹¹ Disability Unit (2020). [Living with non-visible disabilities](#); Vlad, A. (2021). [Let’s talk about the elephant in the room: invisible disabilities - Accessibility in government.](#)

¹¹² Alecia M. Santuzzi et al. (2019), [Identity Management Strategies for Workers with Concealable Disabilities: Antecedents and Consequences](#), Journal of Social Issues 75, no. 3

The evaluation team also spoke to HR colleagues at regional and country level who confirmed these observations based on their interactions with staff. The online survey also supports these findings. Figure 10 shows the reasons indicated for not making a request to the Fund.

Figure 10. 'What was the primary reason you chose not to make a request for accommodation?'
(Source: online survey, n=46)



Fifty per cent of the people declared not making a request to the Fund, either because they did not need it (33 per cent) or handled their personal request with their manager (17 per cent), which may indicate an inclusive culture in the team or office. The other half did not make a request directly because they were not sure if they were eligible (23 per cent); did not want to disclose their condition (7 per cent); were afraid of losing their job (3 per cent); or were not sure how to apply (10 per cent). Sixty-seven per cent of employees with disabilities who completed the online survey (95 out of 141) did not know anything about the RA Fund.

Two employees with less visible or not apparent disabilities stated that they hesitated to request RA because: i) they see stigma towards persons with disability within the organization; ii) their own initial RA experience was negative; or iii) they were aware of a negative experience another colleague had when requesting RA.

“There are many people we lose because they are not aware of reasonable accommodation, especially those that go through burnout. Let’s face it, burnout is something that occurs quite often in UNICEF without us acknowledging it. There is a lot of stigma around it.”
UNICEF HR Specialist and Employee with Disability

Some employees with disabilities, especially those with newly acquired disabilities or new to UNICEF, did not know what accommodations they might need. Two UNVs interviewed said they were asked what accommodations they needed upon being hired, but they did not know what to ask for. Working with UNICEF was their first job following their studies, and they did not understand what the job would entail or how the organization operated, so it was difficult for them to know what to ask for. In some cases, interviewees said they made additional requests after working with UNICEF for a period.

One colleague interviewed had a stroke. Even after rehabilitation and consultations with UNICEF internal and external medical and rehabilitation professionals, the employee was not sure what kind of assistive devices would be helpful.

Another colleague with complete hearing loss and who can speak graduated from university studying under a mainstream education system with hearing students. Only after joining UNICEF did they learn about technological solutions for communication, such as closed captions for virtual meetings and mobile applications that generate captions for spoken language English. These solutions later helped the individual to consider following online education modalities for further studies. When they first started at UNICEF, they found it challenging to know what the best way was to communicate in the work environment. With support from the hiring manager and operations focal point, they were introduced to the RA Fund and started using speech-to-text transcribing software and a sign language interpreter based on their specific needs. The most significant challenge was how long it took to identify the best tools to support the employee and put them in place. They did not know how best to communicate with colleagues until their needs were fully identified, and recognized, and the RA Fund approved their request, after passing through some lengthy bureaucratic issues. The procurement process also took an extended amount of time.

To what extent is the current model suitable to meet related objectives and requirements?

Finding #16: On identified needs to guarantee the RA Fund model is fit-for-purpose

Several key elements of the RA Fund model and within UNICEF systems and procedures are in place to foster a more inclusive work environment. However, there are still factors that can impede the effectiveness or efficiency of the provision of RA.

As the findings presented earlier show, UNICEF already has many systems and procedures in place to promote a more inclusive work environment, while it can benefit from adopting additional good practices. At the same time, there are factors that can hinder the effectiveness or efficiency of the provision of RA and thus the achievement of the organization's goal of employing more persons with disabilities. Some key factors in this regard are explained in more detail below.

Limited awareness of the provision of RA among both staff in general and staff with disabilities

In line with finding 7, the limited awareness of the RA Fund, and in line with interviews with employees with disabilities, there is generally low awareness about the provision of RA across the organization. Therefore, if someone acquires a disability or their need for RA changes, they may not know what support is available.

“Awareness of RA and the Fund is just not there.”
UNICEF HR Specialist
at the country level

Information on who is eligible for RA is vague (i.e., current internal guidance does not clearly specify what constitutes a long-term disability)

In line with finding 1, the current guidance on RA includes a definition of persons with disabilities from the CRPD but does not go further to explain more practically how to determine what is long-term according to the CRPD. Some employees with disabilities interviewed stated that even with the CRPD definition it was not clear if they were eligible. Three staff directly involved with the RA Fund also felt there was a need to clearly articulate the RA eligibility criteria, so that as the organization moves towards the seven per cent goal, there is existing clarity around approval for incoming staff with disabilities.

Lack of staff in each office who are trained on RA and could therefore ensure a smooth process (e.g., operations personnel, IT)

As mentioned in early findings such as finding 6, the absence of personnel trained on RA can impede the provision of RA. In some cases, not having personnel with dedicated knowledge or training led to breaches of personal confidential information and in a few cases employees with disabilities did not receive the support they needed when they arrived at their new post or office. In other cases, new employees with disabilities received support from whoever in the office saw the gap and decided to find a way to support, even though they did not have formal training providing knowledge of how to support someone with disability.

Lack of a comprehensive set of monitoring and evaluation tools and practices for continuous learning and refinement (e.g., user satisfaction surveys)

Consultations with external experts and internal stakeholders brought to the surface the lack of a comprehensive set of monitoring and evaluation tools (e.g., user satisfaction survey) and practices (e.g., routine follow-up with users) within UNICEF's RA Fund, constraining UNICEF's ability to identify and address issues, such as employee satisfaction (as outlined in finding 3 as a good practice to be adopted), the usefulness of the accommodation, or any changes needed. These will be necessary to ensure accountability, learning and quality assurance.

A budget that is set yearly and does not have a clearly defined mechanism to increase the amount if demand exceeds the budget available

While the current RA Fund budget of US\$300,000 is sufficient to cover the present-day requests, the existing amount and budgeting approach are likely insufficient to meet the DIPAS goal to go from the current self-disclosure rate to the target of 7 per cent of employees with disabilities by 2030.

Based on the data that a typical cost of an accommodation is US\$500, and UNICEF maintains approximately 14,000 employees, it could budget US\$490,000 for the target of 7 per cent of employees with disabilities. However, research shows that approximately 50 per cent of accommodations (both soft and hard) do not incur a cost. Given the nature of UNICEF's work, a large amount of RA funding is spent on costs related to hiring of personal assistants and costs incurred when PAs travel with an employee with disability. The amount needed for travel fluctuates greatly from year to year. Therefore, UNICEF could aim to increase the RA funding by US\$30,000 each year, aiming for US\$500,000 in 2030, with the caveat that every six months usage would be reviewed to ensure additional funds are available as staffing needs change.

The following box explains the data on typical costs for accommodations.

Typical Costs for Accommodations

A 2020 survey report prepared by the Job Accommodation Network (JAN) for the Department of Labor's Office of Disability Employment Policy showed that 56 per cent of workplace accommodations for employees cost absolutely nothing to execute. The remaining ones typically cost just US\$500. The JAN survey covered 3,369 employers, of which 1,029 companies were able to provide data related to their actual costs of accommodations. As many as 571 employers (56 per cent) said that they incurred no cost for making accommodations for their employees. Another 403 employers (39 per cent) reported incurring a one-time cost. Only 46 employers (4 per cent) said that they experienced an ongoing, annual cost for the accommodation, while 9 employers (1 per cent) said that they incurred a combination of one-time and annual costs of accommodation. The median one-time cost among the employers who reported it was US\$500. The survey participants were also asked how much they paid for an accommodation beyond what they would have paid a worker without disability who was in the same position. The median response was US\$20.

There will also be savings for the RA Fund if the items that are substitutions for commonly procured items (e.g., noise cancelling headsets for typical headsets) are paid for by the standard budget, whether it be the office (e.g., Disability Team), section (e.g. Programme Group) or budget holder such as ICTD or DFAM.

The following box highlights one approach to budgeting for RA from Mobility International (MIUSA), a US-based disability organization.

MIUSA Budgeting Approach for RA

MIUSA recommends adding a 'disability-related accommodations' line-item to programme and administrative budgets and incorporating RA costs into the total request. MIUSA suggests requesting three to five per cent of total programme costs for mainstream programmes (i.e., a programme that is geared to the general population, which includes persons with and without disabilities) and two to three per cent of the total administrative costs for organizational investments (e.g., disability accommodations for staff).

Current culture in the organization has led to some employees with disabilities not feeling comfortable disclosing their disability status and therefore not applying for RA

As noted in findings 14 and 15, the current culture plays a major role in whether employees feel comfortable disclosing their disability status to apply for RA and whether there may be any negative consequences of doing so. More than two dozen internal key informants with backgrounds in disability inclusion, reasonable accommodation or living with disability mentioned they had observed a low level of disability awareness, inclusion and etiquette in the organization that led them or their peers with disabilities not to feel comfortable disclosing their disability status.

Finding #17: Role and Support to Disability Connect

Disability Connect is a helpful platform for peer-to-peer support and sharing information about RA with employees with disabilities. The group's ability to play a crucial role is hindered by not having sufficient resources to ensure its communications and activities are accessible.

UNICEF's employee resource group (ERG) for persons with disabilities, called Disability Connect, was perceived by interviewees as a helpful platform for peer-to-peer support and to provide new hires guidance on the availability and process to request RA.

In private sector companies, ERGs are the link between employees with disabilities and management concerning issues around disability inclusion. Depending on the company, they may be used as a type of advisory committee or less formally as a welcoming aspect of company inclusion efforts.¹¹³ They often support human resources with onboarding staff to ensure new hires understand what services and benefits are available and how to access peer support. Currently, Disability Connect is not being supported with the necessary resources to ensure its communications and meetings are accessible.¹¹⁴

¹¹³ "ERGs need to be strong and visible. Most ERGs have a role in sourcing the views of the community to the company but move away from any responsibility the organization should be responsible for." - Brendan Roach from Purple Space

¹¹⁴ It has been highlighted in this context that none of UNICEF's employee resource groups currently receive funding.

6. CONCLUSIONS

As explained in the methodological section, this evaluation assessed the RA Fund's model i) in the sense of a *policy* designed and offered by the organization, ii) the implementation of related *processes*, and iii) its effectiveness in achieving *outcomes*; not only from the perspective of the organization (e.g., administrators of the Fund), but most importantly, for its actual users and potential future recipients. The following conclusions are broadly organized along these strategic points of view.

The RA Fund from a policy dimension

Overall, UNICEF made a significant effort to provide costed accommodations to employees with disabilities. The Fund has been administered in good faith and in a spirit of inclusiveness and has mostly made decisions in favour of all those who could benefit from RA. The Fund's approach meets international standards, and it adopted some good and proven practices, while it could benefit from adopting others.

The evaluation showed that the provision of reasonable accommodation is essential to enable persons with disabilities to apply for jobs and perform essential job functions. In this way, RA contributes significantly to an equitable and enabling work environment. UNICEF is arguably one of the most advanced UN organizations in terms of RA experience and expertise. Its Disability Inclusion Policy and Strategy (DIPAS), which addresses RA, is a progressive framework to which other UN organizations can look.

The RA Fund is complementary to other internal funds (e.g., Greening and Accessibility Fund) and accessibility mechanisms (e.g., Accessibility Help Desks). At the same time, UNICEF would benefit from a deeper study into how RA is linked with occupational health and safety and UN Medical when it pertains to the hiring, support and retention of persons with various types of health conditions, whether temporary, episodic, or long-term impairments.

The evaluation was limited in scope as it only looked at the Fund, which processes accommodations with a cost, while research shows that the majority of accommodations do not have a cost. The best way to tackle this area effectively is therefore to look at accommodations holistically, both with and without costs, as progressive organizations are already doing.

Despite its achievements, calling it an RA Fund is sending the wrong message. As a 'fund,' it denotes a finite amount of money and does not convey the organization's interest and obligation to provide every employee with disability what they need to do their job. Moving to a centralized accommodation programme or 'one-stop shop' model would enable UNICEF to ensure every employee with disability has what they need to perform essential job functions to the same extent as their non-disabled peers. A one-stop shop would issue 'accommodation passports' for all types of accommodation, including those with and without a cost.

"The word fund makes you feel like that you are owing something, or that you need to apply for something that you shouldn't be applying for."

UNICEF Employee with Disability

“The one-stop shop is an excellent idea. It should [...] already be in place [and] will only be a win-win situation for everyone. It will help us recruit and retain employees.”

UNICEF HR Specialist

Quality of operationalization and internal awareness

While efforts were made to raise awareness on disability and RA through targeted webinars and all-staff communications, more needs to be done to ensure all staff members are aware of RA and know how to submit and support requests. Varying levels of disability awareness, understanding and etiquette across the organization, compounded by a historically ‘ableist’ culture, has resulted in: i) inconsistent experiences of RA users; ii) employees with disabilities not knowing that RA was available; iii) employees not knowing what they could request or needed; and iv) employees feeling uncomfortable disclosing their disability.

Although UNICEF has a well-established process to request RA, the inconsistent quality of requesters’ experiences once a request has been made deserves particular attention. The lack of established procedures and a written operations manual result in inconsistent and complicated procedures, for example in relation to the procurement of accommodations at the country and regional level. An operations manual would also address other issues raised throughout this report, including information on how to procure accommodations (e.g., assistive technology), guidance on how to handle personal information, and how a requester would raise issues or complaints. A clearer process also might help individuals who were previously hesitant to request accommodations feel more comfortable. While the RA online application form in Service Gateway is easy to locate, some of the questions need to be revised to be clearly understandable.

UNICEF is missing a comprehensive set of monitoring and evaluation tools and practices for the Fund (e.g., tracking of the time taken between initial request and actual delivery, user satisfaction surveys, or routine follow-ups). This shortcoming limits UNICEF's ability to identify and address issues and tackling it will help to ensure the organization is fully meeting CRPD and UNDIS obligations.

Results achieved

The Fund has been effective in the provision of accommodations. The vast majority of RA requests made to the Fund between 2020-2022 were approved, regardless of employee category or geographic region. The time taken to process requests was, for the most part, in line with the international best practice standard. Users found the Fund helpful, its administrators were commended for their support, and the accommodations provided have been rated as highly satisfactory.

Looking ahead: Is the current model suitable to meet related objectives and requirements

While the current RA Fund budget is sufficient to cover the present-day requests, the existing amount and budgeting approach may not be sufficient to meet the DIPAS goals. Some savings can be attained if the RA Fund does not cover the costs of accommodations that should be mainstreamed within the organization. This will allow the RA budget to

cover more of the higher cost requests (i.e., PAs and PA travel) that are not direct substitutes for similar items that staff already receive (e.g., noise cancelling headphones, ergonomic furniture, sit/stand desks, ergonomic chairs, keyboards, mice).

To continue to meet the needs of staff with disabilities and the goal of hiring more persons with disabilities, UNICEF needs to ensure the right staffing and composition of the advisory committee. The membership of the current RA Committee should be reviewed to ensure it has members from diverse but relevant backgrounds and there is no potential conflict of interest among the members. The Committee includes representatives of Disability Connect, where there is a potential conflict of interest as they may be in a position of advising members on RA, then being asked to decide if the request should be approved.

With the right resources to ensure accessible communications Disability Connect can continue to be a helpful platform for peer-to-peer support and sharing information about RA with employees with disabilities.

7. RECOMMENDATIONS

The following recommendations build on the findings and conclusions of this evaluation and are presented in order of priority. They have been discussed and co-created in validation workshops as well as commented on by key stakeholders and experts, both within the Evaluation Reference Group and beyond.

Recommendation 1:

UNICEF should **transition from an RA Fund to an RA Office**, with accountability to senior leadership and dedicated staff to manage it. The RA Office should act as a ‘one-stop shop’ (single point of entry for the provision of services), using a case management approach, with the authority to issue ‘accommodation passports’ that would facilitate and advise on RA for employees with disabilities, while ensuring that personal information is stored appropriately, and key communication is in the applicant’s preferred UN language, if requested.

Suggested actions:

1. *Prepare a plan for the transition from an RA Fund to an Office/one-stop shop.*
2. *Maintain/establish an administrator of the RA process at HQ, with RA expertise, within the RA Office.*
3. *Gather examples of best practices and formalize a standard form for attestation/verification of disability when an employee’s disability is not apparent.*
4. *Create a system for issuing accommodation passports and develop and implement a plan to issue them to existing RA users.¹¹⁵*
5. *Formalize an ICT catalogue for fast-track procurement.*
6. *Review existing arbitration/complaint mechanisms, and if there are none already covering RA, they should be established.*
7. *Communicate via relevant channels what steps an employee or job applicant should take if they have a concern or negative experience in requesting RA.*
8. *Develop an if/then yes/no flowchart/algorithm (that could be online and automated) to guide staff on the process. This would be helpful for both the applicant, manager, and HR to gain a better understanding of the process.*
9. *Conduct a detailed mapping to provide further clarity on how RA aligns and/or complements broader HR tools and policies, for example health insurance, wellbeing, and occupational health provisions and provide better guidance and information on the substitution test (see [box on Substitution Inclusion Strategy](#) for more details) and where and how to get RA.*
10. *Create a dialogue/sensitization between UNICEF’s Division of Human Resources/RA Office and UN Medical Services to clarify processes, when UN Medical should refer someone for RA, and ways to work together to ensure personnel with disabilities are hired and retained. No employee should be denied employment based on disability without UN Medical asking the employee if they would like to consult the RA Office first to see what they suggest.*

Priority/timeframe: Very high/high, to be addressed within 6-12 months

Cost implications: Largely neutral, but additional financial and human resources may be required for individual measures and the staffing of the future office

Responsible units: Culture and Diversity team, Division of Human Resources

¹¹⁵ RA should only pay for disability-related accommodations that are in addition to what a non-disabled person would receive. For example, the hiring of a personal assistant, costs associated with a personal assistant to travel with an employee, or sign language interpretation.

Recommendation 2:

To ensure that employees and applicants are aware of and can access reasonable accommodation, UNICEF should strengthen its internal and external measures to effectively communicate the organization's commitment to provide RA and how to request it.

Suggested actions:

1. *Senior leadership to send out a letter to all UNICEF staff promoting the DIPAS and specifically the operations-related goals and targets, reiterating the importance of maintaining confidentiality about someone's disability and reminding them what RA is and that it is for individuals with both obvious and not obvious disabilities.*
2. *RA Fund/Office to publish information about RA in U-Message (or other appropriate channels) at least twice a year, describing what RA is, the different types of RA, and how to request and receive it.*
3. *Ensure the availability of RA is clearly included in every vacancy announcement published by UNICEF.*

Priority/timeframe: High, to be addressed within six months and ongoing

Cost implications: Neutral

Responsible units: Senior leadership/Office of the Executive Director, Culture and Diversity team, Division of Human Resources

Recommendation 3:

UNICEF should **strengthen organization-wide strategies, training, and communication activities** towards achieving a truly disability-inclusive and accessible workplace. This is necessary to support the provision of RA and to work towards the goals of the DIPAS, particularly the target of 7 per cent of employees being persons with disabilities by 2030.

Suggested actions:

1. *Review and update the UNICEF Procedure on Disability-Inclusive Communications to address unresolved issues (e.g., criteria to determine when sign language should be part of a UNICEF event or meeting; ensuring all word documents that are created by UNICEF are accessible for screen readers).*
2. *Noting the key role that employee resource groups on disability can play in advising new staff with disabilities as they enter the organization, ensure that they have essential support required, such as sufficient budget to ensure meetings and communications are fully accessible; or by ensuring that colleagues in key roles have the opportunity to allocate an explicit percentage of their time to their commitment.*
3. *Provide mandatory specialized training for all managers and HR/Operations colleagues on disability inclusion, RA and related measures and processes that fall within their area of responsibility (this could be done through the DEI module currently being developed, with a sub-module on disability inclusion and RA).*
4. *Set up a network of focal points dedicated to disability-inclusive operations.*
5. *Add a disability inclusion component with a mention of RA to performance plans and reviews for managers.*
6. *Conduct regular communication/behaviour change campaigns; and deliver continuous internal communication messages to change attitudes around disability inclusion and disclosure particularly in the workplace.*

Priority/timeframe: High, to be addressed within 6-12 months and ongoing

Cost implications: Partly neutral, partly financial resources may be required

Responsible units: Culture and Diversity team, Division of Human Resources, Division of Global Communication & Advocacy

Recommendation 4:

UNICEF should continue **to approve all RA requests that meet the criteria and ensure their consistent and effective provision** across the organization in line with international best practices, while addressing existing issues in RA guidance and procedures.

Suggested actions:

1. *Update all RA guidance documents and relevant procedures to ensure the first criteria is whether the request would remove or mitigate a barrier encountered by the employee in performing an essential job function and the second would be if it imposes a disproportionate or undue burden to the organization. Ensure the decision regarding the RA request is provided in writing to prove specifically how it is an undue burden on the organization and start the official timeframe that personnel have to file a complaint.*
2. *Review and revise the questions in the online request form to ensure they make sense to individuals filling it out (e.g., HR managers or employees).*
3. *RA Fund/Office Administrator to follow up to ensure accommodations that should be covered by another unit within UNICEF are provided when they are appropriate and would be covered for employees without disabilities (e.g., a standing desk in place of a traditional desk). RA policy should pay for only disability-related accommodations that are in addition to what a person without disabilities would receive (for example, the hiring of personal assistants, costs associated with PAs to travel with employees on mission, and sign language interpretation).¹¹⁶*
4. *Develop an RA operations manual that outlines how the RA Fund/Office, HR and Operations colleagues, and direct managers should respond to and handle various types of requests, including ones that are not costed and/or require liaison with other internal offices concerning who will pay.*

Priority/timeframe: Very high, to be addressed within 6-12 months

Cost implications: Largely neutral, possibly cost-saving for the Fund

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 5:

To **ensure quality assurance and user satisfaction**, UNICEF's RA Fund/Office should use an appropriate set of tools and practices to monitor and evaluate the provision of RA to employees and applicants across the organization.

Suggested actions:

1. *Establish an automatic user survey to reach requesters/users one month and six months after an RA request is made.*
2. *Use Service Gateway to do an analysis of how long it takes for RA Fund/Office administrator(s) to respond to a request.*
3. *Track how long it takes for the accommodation to be in place with the requester.¹¹⁷*
4. *Conduct annual surveys to assess the effectiveness of RA provision.*
5. *Write an annual report highlighting type of requests, what accommodations were provided, how/who procured the accommodation, any issues that came up, etc.*

Priority/timeframe: Very high/high, to be addressed within 6-12 months

Cost implications: Neutral if measures are carried out by internal staff

Responsible units: Culture and Diversity team, Division of Human Resources

¹¹⁶ In this context, a detailed explanation of the Substitution Inclusion Strategy is [available here](#).

¹¹⁷ Sample tracking form/Accommodation Checklist for Administrators are available [herehttps://askjan.org/Forms/upload/Reed-Group-accommodation-checklist-June-2014.pdf](https://askjan.org/Forms/upload/Reed-Group-accommodation-checklist-June-2014.pdf) on the Job Accommodation Network.

Recommendation 6:

UNICEF should **regularly review RA expenditure and recruitment activities** (e.g., hiring persons with disabilities and any targeted recruitment) to ensure that additional funds can be quickly allocated to RA as needed to support personnel with disabilities.

Suggested actions:

1. *Review the current annual budgeting process to incorporate mid-year adjustments (approval for additional funding should be obtained when the RA budget line is 80 per cent spent) and yearly forecasting of RA costs based on current staff support and any positions that are likely to be filled by persons with disabilities.*
2. *Review the mid-and long-term forecasted budget annually and adjust accordingly. Approval for additional funding should be obtained when the Fund is 80 per cent spent.*

Priority/timeframe: High, to be addressed within 6-12 months and ongoing

Cost implications: Neutral, additional financial resources may be required if an increase in budget is necessary

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 7:

UNICEF should **review the composition of the RA Committee**, which decides on requests over US\$2,500, to ensure broad representation and appropriate expertise and avoid potential conflicts of interest if committee members are also in positions to advise personnel with disabilities, for example through Disability Connect.

Suggested actions:

1. *Continue to ensure that the core RA Committee membership includes representatives of the RA Fund/Office administration and the Programme Group Disability Team but complement them with an Advisory Panel comprised of experts in occupational health, mental health, assistive technology, and medical services (ideally global and local representatives), to support the RA Committee with technical advice on RA requests as needed. If UNICEF does not have specific expertise in-house, external experts should be contracted to serve on the Advisory Panel. Since the Disability Connect co-chairs often provide guidance on RA to members, they should be removed from the RA Committee, so that they no longer have to make decisions about RA provisions.*
2. *To ensure appropriate representation, at least 30 per cent of the RA Committee, whether internal members or external experts, should be people with disabilities and come from diverse backgrounds.*
3. *Develop standard operating procedure for the RA Committee and ensure there is a clear process in place when one of the Committee members requests RA, to avoid any possible conflict of interest.*

Priority/timeframe: High, to be addressed within six months

Cost implications: Neutral

Responsible units: Culture and Diversity team, Division of Human Resources

Recommendation 8:

UNICEF should continue to **share knowledge and experience on reasonable accommodation with other UN organizations** to promote collaboration and learning in this area and the effective inclusion and non-discrimination of persons with disabilities.

Suggested actions:

1. *DED Management to engage in high-level discussions with the UN System through the High-Level Committee on Management to share information learned through this evaluation and take on leadership in this area.*
2. *RA Fund/Office to engage in working-level discussions and share information learned through this evaluation.*

Priority/timeframe: High, to be addressed within six months

Cost implications: Neutral

Responsible units: Deputy Executive Director Management, Culture and Diversity team

8. LIST OF ANNEXES

The following annexes are included in a separate document:

Annex 1: Evaluation framework

Annex 2: Documents reviewed

Annex 3: List of persons interviewed

Annex 4: Guiding questions for interviews

Annex 5: Summary of the online survey

Annex 6: Terms of reference



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January 2024