

## **Contribution to EC consultation on Renewed Sustainable Finance Strategy ONCE Social Group**

### **Background**

There are **100 million people with disabilities** in the EU, a vulnerable group of population explicitly recognized as such in the **2030 Agenda for Sustainable Development** (Declaration 19, 23). Furthermore, the **European Pillar of Social Rights**, foresees principle 17 on inclusion of people with disabilities promoting their participation in the labour market and in society, and a work environment adapted to their needs. In addition, the **Disability Strategy 2010-2020**, being re-elaborated, calls for the mainstreaming of disability in all EU policies, including participation in the labour market, and specific regulations such as the **European Accessibility Act** set requirements for a range of products and services.

The above, together with the **UN Convention on the Rights of Persons with Disabilities** (ratified by the EU and all EU member states) and the **EU non-discrimination legislation**<sup>1</sup>, among others, lead us to consider that disability and accessibility need to be taken into account in the **renewed sustainable finance strategy**.

### **Disability, Corporate Social Responsibility and Sustainability, a link to be highlighted within Sustainable Finance**

Important steps have been taken at EU and international level during the last 10 years to include disability and accessibility as part of the corporate social responsibility (CSR), diversity, sustainability, business & human rights, and non-financial reporting agendas:

- The renewed **EU Strategy 2011-14 for Corporate Social Responsibility** explicitly recognized, for the first time, disability as part of the CSR agenda. The disability dimension in CSR was further reinforced in the European Parliament resolutions of 6 February 2013 on CSR.
- **2030 Agenda for Sustainable Development** explicitly recognized people with disabilities (1 billion people in the world) as a vulnerable group. Different SDGs also refer to people with disabilities, such as SDG 8 on Decent Work and Economic Growth, SDG 10 on Reduced inequalities or SDG 11 on Sustainable Cities and Communities (with a specific mention of accessibility). Also, SDG 4 on Quality Education and SDG 17 on Partnerships for the Goals speaks of people with disabilities. A key idea of the 2030 Agenda is that sustainability is not only linked to environmental issues, being social aspects equally important. "No one should be left behind".

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<sup>1</sup> Disability is one of the discrimination grounds addressed by EU's non-discrimination legislation (Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation) and it is also recognized by the EU Treaty together with age, gender, racial or ethnic origin, religion or belief, or sexual orientation (article 10), as well as in the EU Charter of Fundamental Rights (article 21 and 26).

- In the context of **business and human rights**, the Guiding Principles on Business and Human Rights implementing the UN 'Protect, Respect and Remedy' Framework (UNGPs) or the OECD Guidelines for Multinational Enterprises include disability and so do other Commission instruments<sup>2</sup>. Other reference institutions have underlined the link between business, human rights and disability, as is the case of the 2017 "Guide for business on the rights of persons with disabilities" by ILO and Global Compact.
- Regarding current **Directive 2014/95/EU** on disclosure of non-financial and diversity information –now in revision–, the topic of disability was included in the EU institutions' discussions prior to approval<sup>3</sup>. The EC guidelines on non-financial reporting adopted in June 2017 do contain specific and various references to people with disabilities in relation to employee and board diversity, accessibility of products and services, and human rights, including examples of key performance indicators<sup>4</sup>. Furthermore, some countries such as Spain, have integrated disability and accessibility in the NFR Directive national transposition<sup>5</sup>. Reference organizations such as **GRI** have noted the importance of disability as an aspect of non-financial reporting, proposing specific indicators<sup>6</sup>.
- It is also worth noting that Disability is increasingly recognized as an element of diversity, and people with disabilities as a source of talent, growth, innovation and market opportunities. The potential of inclusive businesses is being more and more identified by companies, institutions and thematic initiatives around the world<sup>7</sup>. The **360° approach to business and disability**<sup>8</sup>, allows a comprehensive approach where people with disabilities are seen as stakeholders from a wide perspective, valuing their roles as employees, consumers (including their families seeking for accessible products and

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<sup>2</sup> Such as the Sector Guides for implementing the UNGPs as well as in the Guide for SME "My business and human rights", and various references to disability are included in the 2015 EC staff working document on implementing the UNGPs. In addition, the recent EU Action Plan on Human Rights and Democracy 2020-2024 refers specifically to people with disabilities, in relation to many areas, including accessibility to infrastructure, transport and ICT as well and employment.

<sup>3</sup> Disability was particularly considered by almost all European Parliament Committees involved in the process, and disability was included in the final Report by JURI Committee voted on 17 Dec 2013 Report A7-0006/2014 of 08.01.2014.

<sup>4</sup> References are included in the guidelines' sections 4.6 Thematic aspects: b) social employee matters and c) respect to human rights; and 6 Board diversity disclosure – footnote. Examples of indicators included are: the number of people with disabilities employed or how accessible companies' facilities, documents and websites are to people with disabilities

<sup>5</sup> By means of the Law 11/2018.

<sup>6</sup> Guide on "[Disability in Sustainability Reporting](#)", published in 2019 by GRI and Fundación ONCE with the co-funding of the ESF, with specific guidance and indicators related to business and disability.

<sup>7</sup> Relevant international examples are the *ILO Global Business and Disability Network (ILO GBDN)*, the *Valuable 500 initiative*, [Disability Hub Europe](#) in the EU. At national level, there are other examples, such as the *Inserta Responsible Forum in Spain*, the *UK Business and Disability Forum*, the *Austrian Disability Business Forum*, The *UnternehmensForum* in Germany, or the *Come CloSeR to Disability Task Force* in Poland

<sup>8</sup> A concept created within Disability Hub Europe, a project co-funded by the ESF. DHub's partnership comprises reference organizations such as CSR Europe, Global Reporting Initiative (GRI), ILO Global Business and Disability Network (ILO GBDN), the European Disability Forum (EDF), the multinational companies L'Oréal and DOW, and Fundación ONCE (leading partner).

services), providers, employers, investors and part of the community in which a company operates.

- **Environmental sustainability and people with disabilities: Just Transition to a low carbon economy, inclusive of all.** As the shift to a low carbon economy takes place there will be transitional challenges for workers and communities, especially for vulnerable groups -including people with disabilities-, making the greening of the economy a social justice issue. In this sense, the ‘just transition’ framework offers a range of social and economic interventions needed to secure rights and livelihoods. The critical need for the transition to a low-carbon economy to be both fast and fair is recognised in the Paris Agreement itself<sup>9</sup>. In this context sustainable finance should promote a just transition that leaves no one behind, being inclusive of vulnerable groups such as people with disabilities<sup>10</sup>.
- Finally, the crisis generated by the **Covid 19 pandemia** drew special attention to vulnerable groups, for example people with disabilities, and the key issue of **equity** (or the lack of it) in our societies becomes a relevant risk for sustainable finance. In response to the crisis, an approach that is inclusive of persons with disabilities is essential to mitigate the negative effects of the crisis and ensure a sustainable recovery<sup>11</sup>.

### **Call to action: including disability dimension in the Renewed Sustainable Finance Strategy**

Following the ideas above, we call on the EU to further strengthen and develop the social dimension of sustainable finance, making sure no one is left behind, including people with disabilities. In particular:

- The “do not harm” principle (do not impact negatively other areas different than the ones financed) is a good tool that should also help to pursue a positive impact on vulnerable groups such as people with disabilities and to not harm by creating more inequalities and barriers (eg. by promoting not accessible products and services).
- The UE Taxonomy could play an important role to define the common framework for private and public sector, including EU spending, to contribute to sustainable growth and meet both environmental and social objectives of the EU. In this second case, particularly in alignment with the European Pillar of Social Rights, and the social dimension of the Agenda 2030 and the SDG, making sure no one is left behind, including people with disabilities.
- Considering that transition to a sustainable economy will be driven by significant investment efforts across all sectors, public and private financing frameworks must take into account most vulnerable groups, such as people with disabilities, in order to ensure that the transition is a just process.

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<sup>9</sup> ILO policy brief [“Persons with disabilities in a just transition to a low-carbon economy”](#),

<sup>10</sup> [Making the future of work inclusive of people with disabilities](#), by ILO GBDN and Fundación ONCE in the framework of Disability Hub Europe, co-funded by the ESF.

<sup>11</sup> [ILO Policy Brief: COVID-19 and the World of Work: Ensuring the inclusion of persons with disabilities at all stages of the response.](#)

- Some examples of impacts that could lead to greater inequalities among people with disabilities are the changes in the job market and the skills requirements (in a group of population already affected by much lower employment rates); a possible initially higher cost of green products, sustainable food and transport and renewable energy -which may negatively impact the lower income people/regions; or the impact of climate change itself on this group of population.
- However, the shift to a climate neutral economy presents also opportunities that sustainable finance can promote, such as “green jobs” inclusive of all, or the development of new sustainable and smart buildings, infrastructures and transport integrating at the same time the principles of accessibility and design for all, particularly in a context of a significant EU aging population<sup>12</sup>.

## Who are we?

ONCE Social Group is a public corporation under Spanish law whose main mission is the social inclusion of blind and partially sighted people in all areas of life. In 1988 ONCE, the Spanish National Organization of the Blind, set up the ONCE Foundation, thus extending its commitment to solidarity to include people with disability in general. To achieve this, ONCE Foundation delivers actions focusing on training, employment and universal accessibility by and for people with disabilities, approximately four million Spanish citizens.

ONCE Social Group’s main sources of income, which is reinvested in the development of our social services in its entirety, is the sale of our responsible lottery products, as well as the revenues obtained from the activity of ILUNION, the group’s socially-conscious business, created with the goal of employing persons with disabilities. In addition, ONCE Foundation’s training and employment programmes for persons with disabilities, developed in partnership with the European Social Fund since 2000, are considered an example of best practice by the European Union; more than 400 million Euros have been invested and over 64 000 jobs for persons with disabilities have been created – 50% of them being women with disabilities.

Overall, ONCE Social Group has a joint workforce more than 72 000 employees, 58% of whom have a disability. We are, as a group, the fourth biggest private employer in Spain, as well as the biggest employer of persons with disabilities worldwide.

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<sup>12</sup> Examples of climate change impacts on people with disabilities can be found in the ILO policy brief “[Persons with disabilities in a just transition to a low-carbon economy](#)” as well as examples of opportunities in the transition to a low carbon economy framework such as skills development initiatives in the renewable energy sector that are disability-inclusive; education and training systems focused on conservation agriculture, renewable energy, sustainable tourism or green urban design.