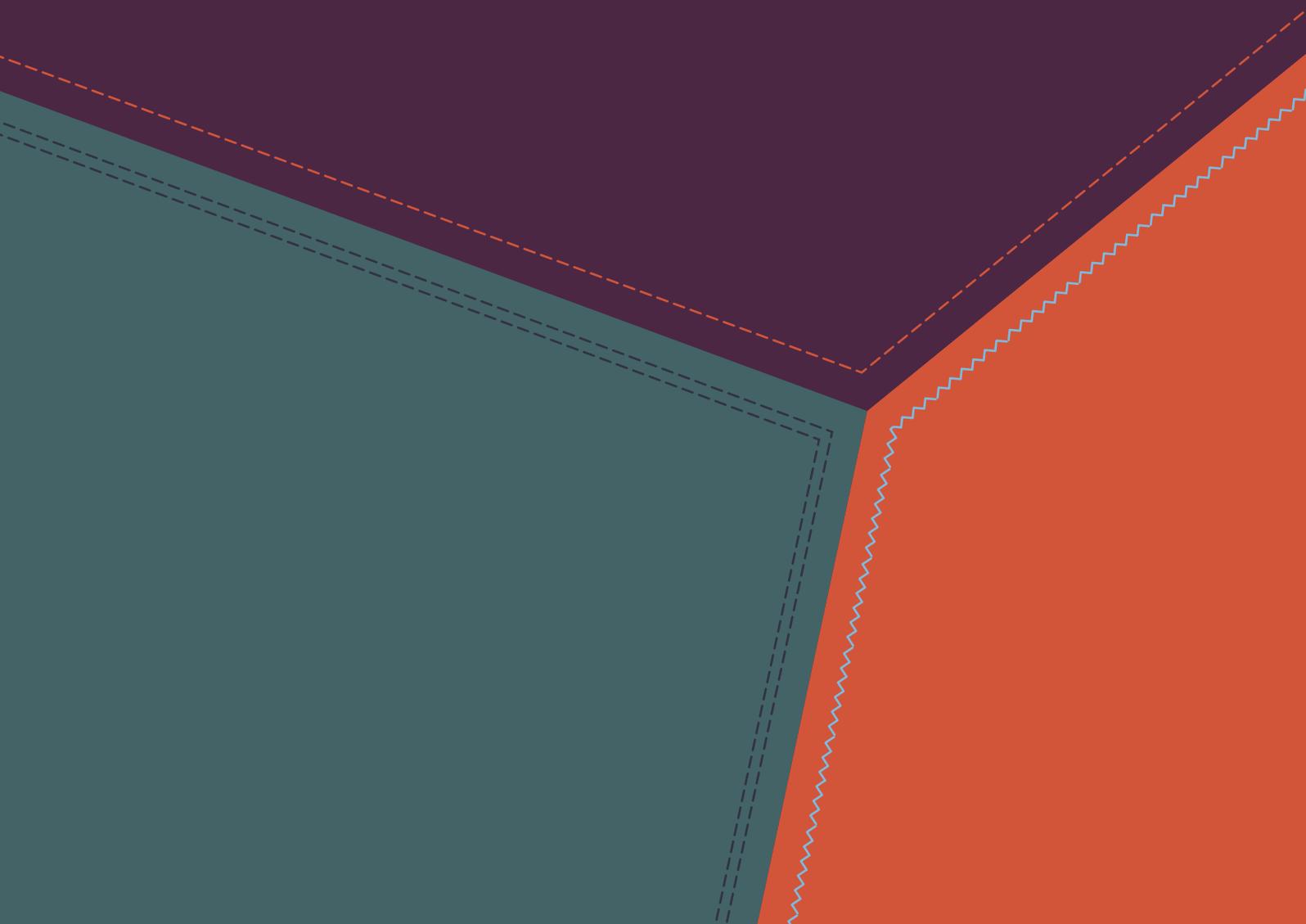


# Guidelines on inclusion in textile supply chains



Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH

Registered offices  
Bonn und Eschborn

Friedrich-Ebert-Allee 32 + 36  
53113 Bonn  
T +49 228 44 60-0  
F +49 228 44 60-17 66

Dag-Hammarskjöld-Weg 1-5  
65760 Eschborn  
T +49 6196 79-0  
F +49 6196 79-11 15

E [info@giz.de](mailto:info@giz.de)  
I [www.giz.de](http://www.giz.de)

Internationaler Verband  
der Naturtextilwirtschaft e.V.

Chemnitzer Straße 229  
12621 Berlin

T +49-30-556 160 75  
E [info@naturtextil.com](mailto:info@naturtextil.com)  
I [www.naturtextil.de](http://www.naturtextil.de)

**Project description:**

Global Project Inclusion of Persons with disabilities

**Author/Responsible/Editor, etc.:**

Malte Drewes

Alexander Thomas Hauschild  
E [alex@alexanderhauschild.com](mailto:alex@alexanderhauschild.com)  
I [www.alexanderhauschild.com](http://www.alexanderhauschild.com)

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Atelier Löwentor, Darmstadt  
I [www.loewentor.de](http://www.loewentor.de)

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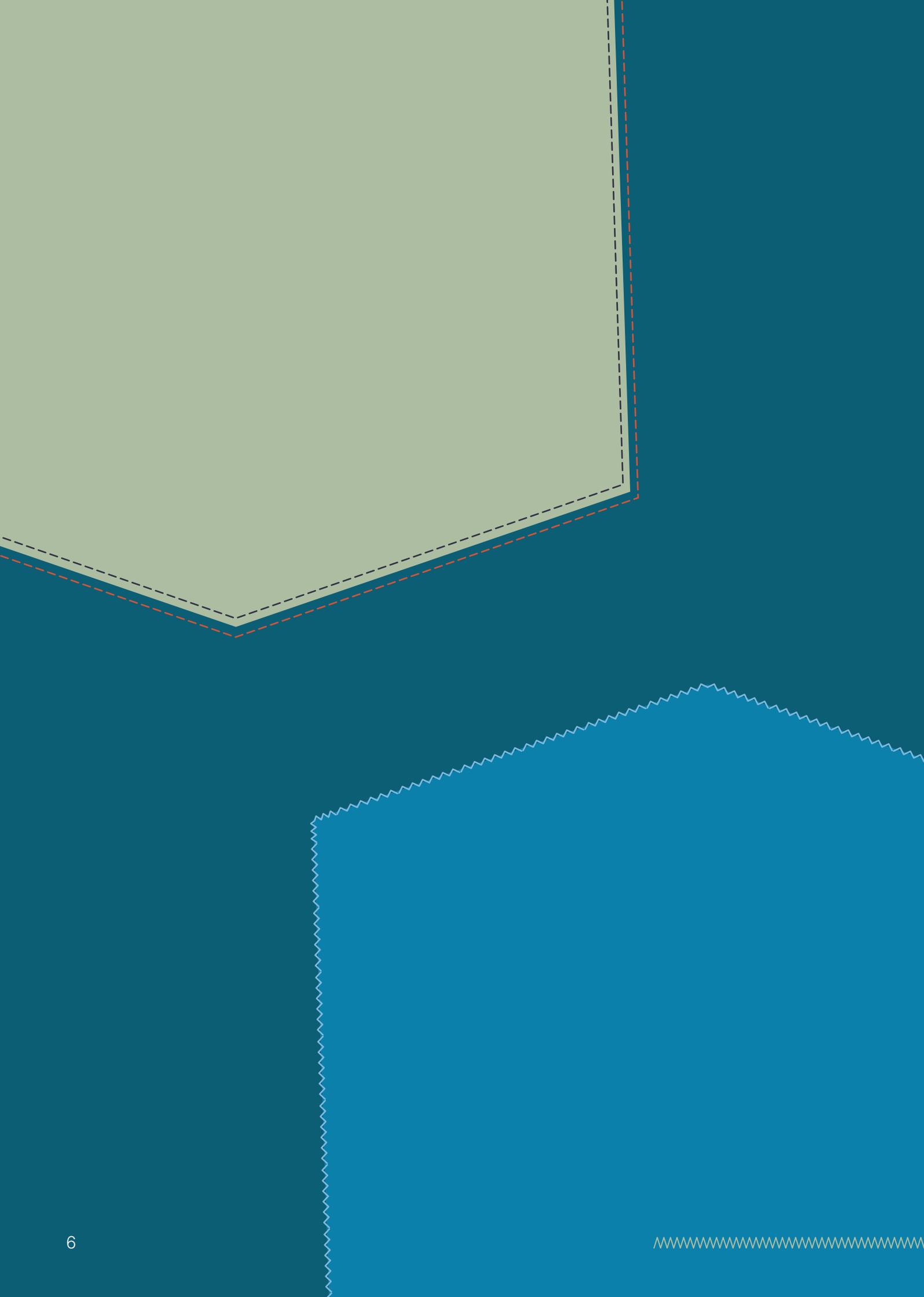
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# ABBREVIATIONS



CBM	Christoffel-Blindenmission
CEO	Chief Executive Officer
CRPD	UN Convention on the Rights of Persons with Disabilities
DPO	Disabled People's Organisation
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
GOTS	Global Organic Textile Standard
HR	Human resources
IJC	Inclusive Job Centre
ILO	International Labour Organization
Integration Office	Amt für die Sicherung der Integration schwerbehinderter Menschen im Arbeitsleben (German office for the integration of persons with disabilities into working life)
IVN	International Association of Natural Textiles (IVN e. V.)
KPIs	Key Performance Indicators
NGO	Non-governmental organisation
SMEs	Small and medium-sized enterprises
UN	United Nations
WHO	World Health Organization





# INTRODUCTION

Inclusion of persons with disabilities poses challenges to many companies, but also presents them with opportunities. The topic involves including persons with disabilities both within their own organisation and along the global supply and value chains.

The objective of these guidelines is to assist companies along the textile value chains with the promotion and practical realisation of non-discriminatory employment for persons with disabilities.

The guidelines are primarily aimed at members of the International Association of Natural Textiles (IVN) and the Partnership for Sustainable Textiles, and their suppliers. They comprise two modules and provide specific pointers for implementing inclusion measures within the company and along the global supply and value chains, based on the needs of brands, retailers and suppliers (textile production firms).

- 1. Module 1 Recommendations for German brands and retailers**
- 2. Module 2 Recommendations for suppliers**

At the same time, they support German development cooperation actors with their project work in the areas of vocational education and training, promotion of employment for persons with disabilities, and raising awareness of these matters among companies along the textile supply chain.

# WHAT DOES INCLUSION MEAN?

**Persons with disabilities** include individuals with long-term physical, psychological or mental disabilities or sensory impairments. The combination of their disabilities and various other barriers means that they are often **hindered from playing a full and equal part in society**. Inclusion of these individuals is a topic that is receiving more attention in both the public and private spheres and is also becoming more important in the business sector. A growing number of companies are making clear commitments to inclusion and diversity, thereby helping to promote participation for all persons in economic and social development.

Inclusion is a journey. It is not simply about persons with disabilities becoming integrated into our current society (**integration**), but rather about society affirming the diversity of its members with their respective talents and limitations, and working to dismantle existing barriers and prejudices (**inclusion**). An inclusive society is geared to people's capabilities. It provides the resources necessary for every individual to participate equally. Everyone benefits from diversity, as it also removes the barriers to participation by persons without disabilities.

What can companies do to help ensure that individuals with disabilities benefit from their economic activities? These guidelines are designed to identify opportunities for enterprises to employ persons with disabilities and thus make a key contribution to creating an inclusive society. Companies that embark on this path enhance their reputation among employees and customers and gain recognition from the state.

If individuals with disabilities are to be included in working life as well, then it is essential to remove barriers. General conditions and support services need to be developed further in order to make vocational training and participation in working life a far more common and systematic part of regular work.





Providing persons with disabilities with real employment prospects requires a wide range of flexible support services. In this restructuring process, it is necessary to draw on the long-standing experience of sheltered workshops for persons with disabilities, specialist integration services and integration enterprises. Sheltered workshops for persons with disabilities and integration enterprises will thus continue to operate in future.

Inclusion in Germany is often associated with **school inclusion** for pupils with disabilities, yet inclusion extends to all areas of life and therefore also to work and occupation.

## Role of sheltered workshops for persons with disabilities

**Sheltered workshops** are a common model in Germany for **integrating** individuals with disabilities into the labour market. However, they do not provide inclusive jobs.

Employees do not participate in the mainstream labour market and thus do not receive wages and salaries typical of that market. Switching to the regular labour market would present obstacles, as there is insufficient dovetail-

ing between sheltered workshops for persons with disabilities and the regular labour market, and that market is not accessible in many cases. The German Federal Participation Act (BTHG) represents one approach the German Government is taking to dismantle these barriers. After this legislation has been fully implemented, along with the corresponding 'budget for work' (Budget für Arbeit), persons with disabilities will have the opportunity of applying their skills either on the regular labour market or in a sheltered workshop for persons with disabilities. The 'budget for work' offers wage subsidies of up to 75 per cent. The following diagram summarises the measures and goals of the BTHG.



The next diagram provides a schematic depiction of the **separate labour markets for persons with and without disabilities**. The board with the square holes represents the sheltered workshop. The square holes represent persons with disabilities. The board with the round holes represents employers on the regular labour market. The round pegs represent persons without disabilities. Persons with disabilities (square pegs) do not 'fit' into the regular labour market (board with round holes).

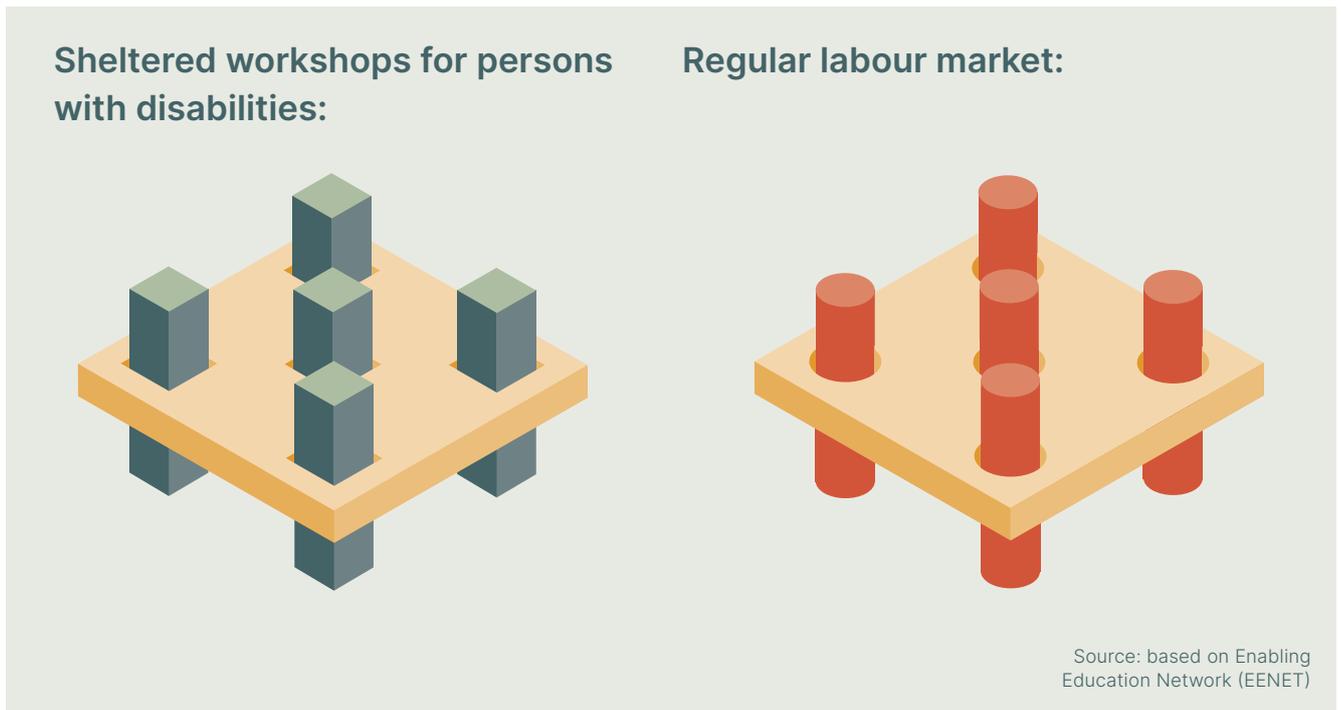


Figure 1: Separate labour markets for persons with disabilities and persons without disabilities

## An inclusive future labour market

**Integration** into the regular labour market means that persons with disabilities have to adapt to the conditions required by employers on the regular labour market. However, employers are not doing enough to make jobs accessible.

The following diagram illustrates this adaptation process. The square peg (person with a disability) has to be adapted in order to fit into the board with the round holes (regular labour market).

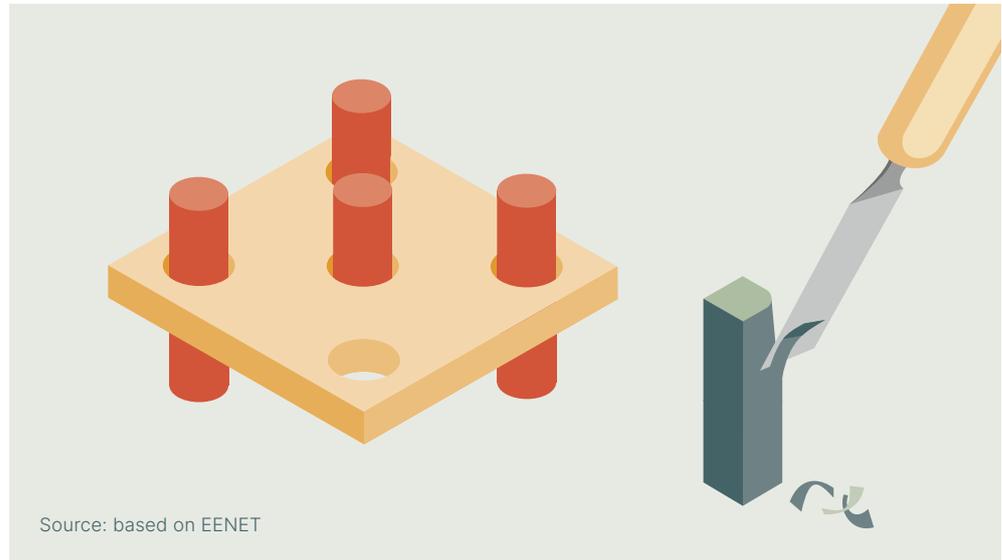


Figure 2: Integration of persons with disabilities is not the same as inclusion

By contrast, an **inclusive labour market** takes account of diversity. It removes barriers to access, participation and performance on the labour market and in social life. In an inclusive labour market system, all individuals participate in the same labour market. Employers are also aware that employees are a diverse group with individual work and behavioural patterns who therefore require different types of guidance and support in order to perform well.

The next diagram illustrates an inclusive labour market, or inclusive employers (board with different types of holes). The labour market/employers take account of the needs of employees and adapt their offerings (different types of holes).

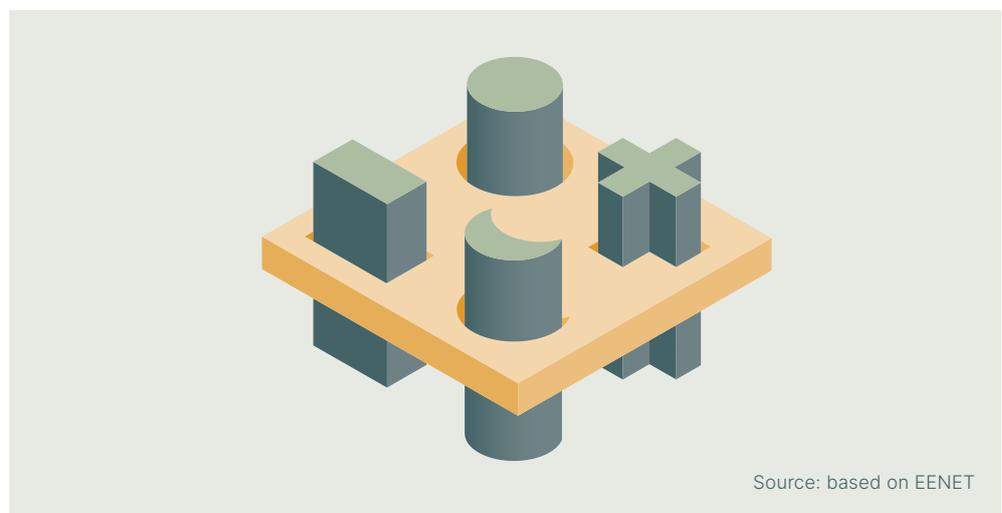


Figure 3: Inclusive labour market

# Twin-track approach

Inclusive employers practise a **twin-track approach to the inclusion** of persons with disabilities. On the one hand, they empower persons with disabilities through needs-specific interventions. On the other, they mainstream inclusive and disability-friendly policies and practices in companies. The objective is to dismantle barriers to participation.

**Track 1** measures include training for employees. They are designed to familiarise employees with the topic of disability and reduce their inhibitions when interacting with persons with disabilities.

Improving the general accessibility of companies also comes under Track 1. These improvements include easily visible signs and signposts, steps with ramps, lifts with Braille buttons, emergency exits with signs, warning lights are sirens, and toilets with large cubicles that are suitable for wheelchair users.

**Track 2** includes measures geared to the individual needs of persons with disabilities, such as company computer workstations with screen-reader and text-to-speech software to enable employees with severely impaired vision to work at them. Other examples include office furniture that can be adjusted to the physical attributes of the user and individual sewing machines that enable persons with physical limitations to work independently.

## Why is inclusion important and beneficial?

### For companies

Inclusion promotes diversity within companies. Companies built around diversity benefit from greater variety of thought and perspectives, which can positively impact overall creativity within the company.

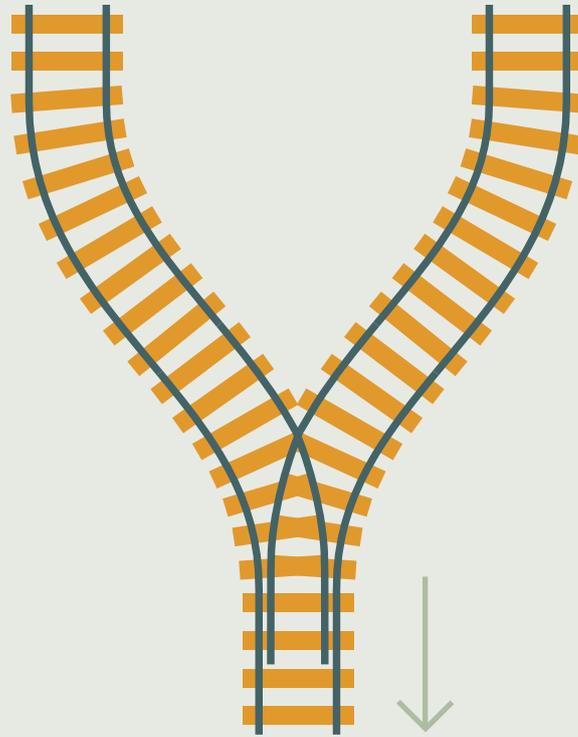
In addition to their professional activities, persons with disabilities promote the development of **social skills** among their fellow team members within a company. Such skills are indispensable in today's global economy and foster the success of the company.

Companies in Germany that employ persons with disabilities enjoy **financial benefits** for doing so. The German Integration Office (Amt für die Sicherung der Integration schwerbehinderter Menschen im Arbeitsleben) offers **integration subsidies** for companies as well as providing **subsidies for setting up disability-friendly workplaces**. The integration subsidies cover up to 70 per cent of wage costs for a period of up to five years. The Integration Office also supports **work assistance** for employees with disabilities.

**Track 1**  
Raising awareness  
among employees  
and improving  
accessibility

+

**Track 2**  
Individual and  
appropriate provisions  
for employees with  
disabilities



**Inclusion**

Source: own diagram

Figure 4: Twin-track approach to inclusion



The contact details of the Integration Office branches are given in the Annex.

Companies that employ persons with disabilities also benefit from a **better reputation**, which they can exploit in their communication and marketing strategy.

### **For society**

Inclusion enables unused potential to be tapped on the labour market. Persons with disabilities who are employed also pay taxes. As a result, they are no longer (exclusively) supported through social transfer payments from the state. Earning an income also means that they become customers for the market. The limitations experienced by individuals with disabilities and their resulting needs open up opportunities for companies to develop new areas of business.

Furthermore, inclusion fosters a sense of solidarity within society and prevents exclusion of individuals with disabilities. Inclusion thus has a significant influence on the quality of life of socially disadvantaged members of society.

Companies cannot achieve inclusion on their own. Institutions and organisations that provide basic services within society, such as schools, associations and religious facilities, should address all members of society on an inclusive basis.

### **For persons with disabilities**

An inclusive society that is keen to reduce barriers and improve accessibility enables individuals with mental and physical disabilities to participate to a greater extent and realise their potential. Consequently, inclusion promotes social justice and equality. This principle is reflected as a basic right in Article 3 of Germany's Basic Law.

Inclusion puts persons with disabilities at the heart of society. In an inclusive society, all persons have the same right to fair opportunities to achieve their dreams and goals.



## Persons with disabilities are a diverse group

The United Nations' World Health Organization (WHO) and the World Bank estimate that around 15 per cent of the world's population have a disability. Eighty per cent of these individuals are of working age. The unemployment rate among persons with disabilities, women with disabilities in particular, is far higher than among persons without disabilities. Added to this is the fact that persons with disabilities tend to work under precarious conditions and for low wages. Because it is difficult for individuals with disabilities to find alternative employment, they are exposed to a greater extent to abuse and exploitation by employers. Additionally, persons with disabilities face high poverty rates. Even if they are employed, they are more likely to remain trapped in poverty.

### Persons with disabilities are not a homogeneous group

Individuals with developmental, hearing and visual impairments and persons with motor or multiple disabilities do not have the same abilities and needs and have to overcome different obstacles in their everyday lives.

An individual with a physical disability who needs a wheelchair to get around, for instance, requires an environment with ramps and lifts in order to access buildings and move between floors. A person with a visual impairment will benefit from tactile flooring to guide him or her, and from lift buttons labelled in Braille.

Figure 6 shows a wheelchair ramp positioned in front of a building entrance.





## **KOMBINIZONA – GARMENTS FOR PERSONS WITH DISABILITIES MADE BY PERSONS WITH DISABILITIES**

Kombinizona is a company that is introducing innovation and inclusion into the Georgian garment manufacturing industry. It spends 30 per cent of its sales revenues on social initiatives and employs 15 persons with disabilities.

Kombinizona has been operating in Georgia since 2017 and it also joined the Georgian Apparel and Fashion Association at that time. It is the first brand to manufacture adaptive fashion wear in Georgia. The company offers bright, functional and comfortable clothing for children, pregnant women and persons with disabilities.

In response to the Coronavirus pandemic, Kombinizona started producing certified medical facemasks.

<https://isfgeorgia.ge/>





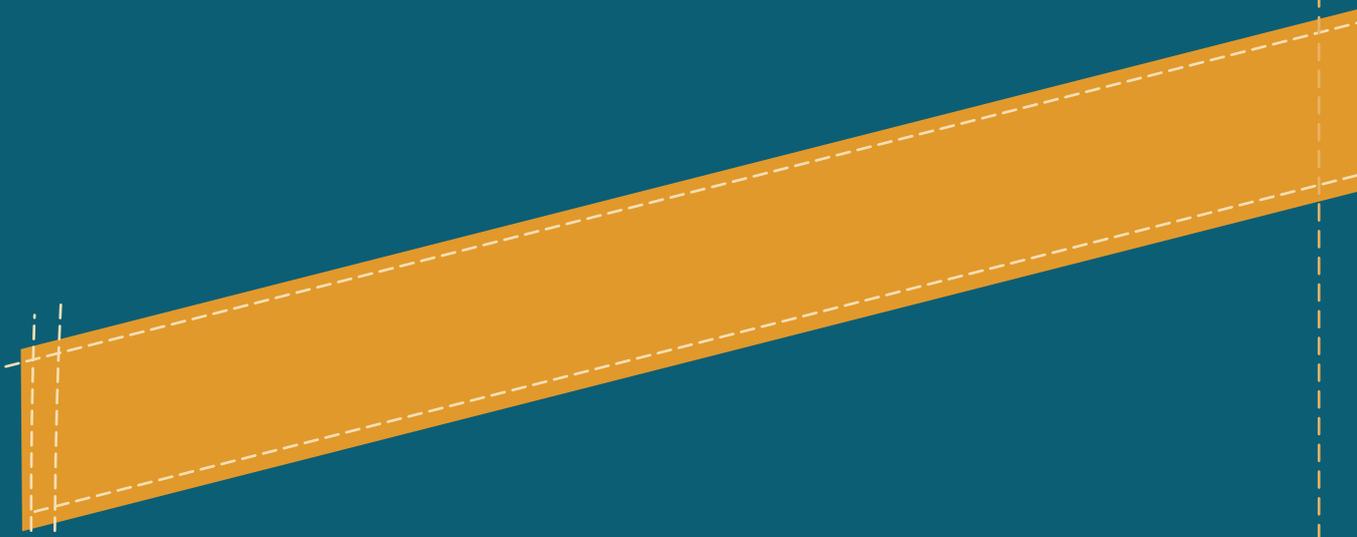
## What does this have to do with the textile industry?

The garment industry employs some 60 million people worldwide. The factories supplying the German textile industry are frequently situated in low-wage countries where environmental and social standards are often inadequately implemented and the statutory minimum monthly wage ranges from USD 50 to USD 100. According to the International Labour Organization (ILO), minimum wage limits are frequently disregarded. Depending on the location, this may impact between six and 50 per cent of employees, with women typically affected to a greater extent than men.

Suppliers and their employees are often paid a unit price. Because these prices tend to be low, employees face pressure to produce a large number of units in order to achieve the monthly minimum wage. The piece rate wages and the large number of units required to earn the minimum wage can present a barrier to persons with disabilities when it comes to working in the textile sector.

All employees are at risk from the frequent insufficiency of occupational health and safety standards in the textile factories, for instance those governing the handling of toxic chemicals. Persons with disabilities can be at particular risk if protective measures, signs and demarcations are not geared to their specific needs.

One common structural challenge in low-wage countries is an inadequate social security system. Persons with disabilities are hit especially hard by a lack of accident insurance cover and insufficient compensation payments for victims of accidents.



# APPROACH TO PROMOTING EMPLOYMENT OF PERSONS WITH DISABILITIES IN THE READY-MADE GARMENT SECTOR IN BANGLADESH

GIZ's project Promotion of Social and Environmental Standards in the Industry worked with the Bangladesh Government, non-governmental organisations (NGOs) and disabled people's organisations (DPOs) to set up an Inclusive Job Centre (IJC) in Bangladesh. The goal of the IJC is to facilitate appropriate employment for persons with disabilities in the textile and garment industry. To this end the IJC intervened at several levels:

- **General conditions:** Raising awareness in governmental and municipal offices of international standards regarding disability-friendly policies;
- **Supply side:** Capacity-building at companies offering vocational training to enable them to promote inclusion of persons with disabilities in the training courses;
- **Job-Matching:** Matching employees with employers on the labour market;
- **Demand side:** Assisting factories and companies with implementing minimum standards for a disability-friendly working environment, e. g. for recruitment and accessibility.

Over 2,400 persons with disabilities working in garment factories have benefited from the project to date.



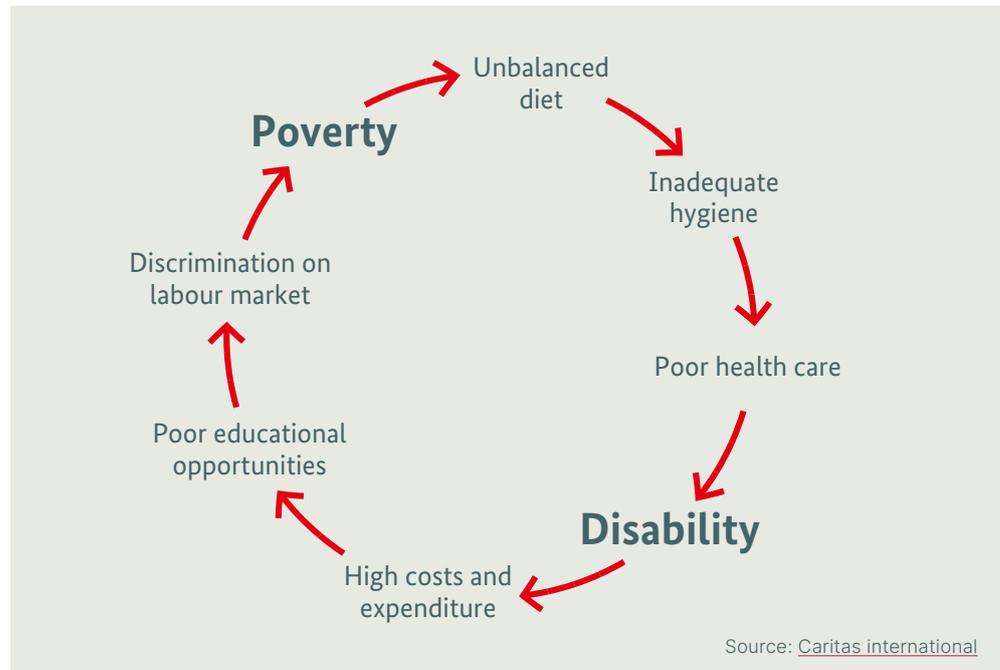


Figure 5: Vicious circle of poverty and disability

Figure 6 depicts the cycle of poverty and disability. On the one hand, individuals living in poverty are at increased risk of developing a disability, as they are often limited to eating an unbalanced diet and have to live in poor hygiene conditions. On the other hand, persons with disabilities have poorer prospects of obtaining a high-quality education and finding a job due to a whole host of obstacles and the cost of disability aids. All in all, individuals with disabilities are at greater risk of living in poverty.

By contrast, having a secure job within the mainstream labour market gives persons with disabilities the **opportunity to live a life free of poverty.**

## What responsibilities do companies have?

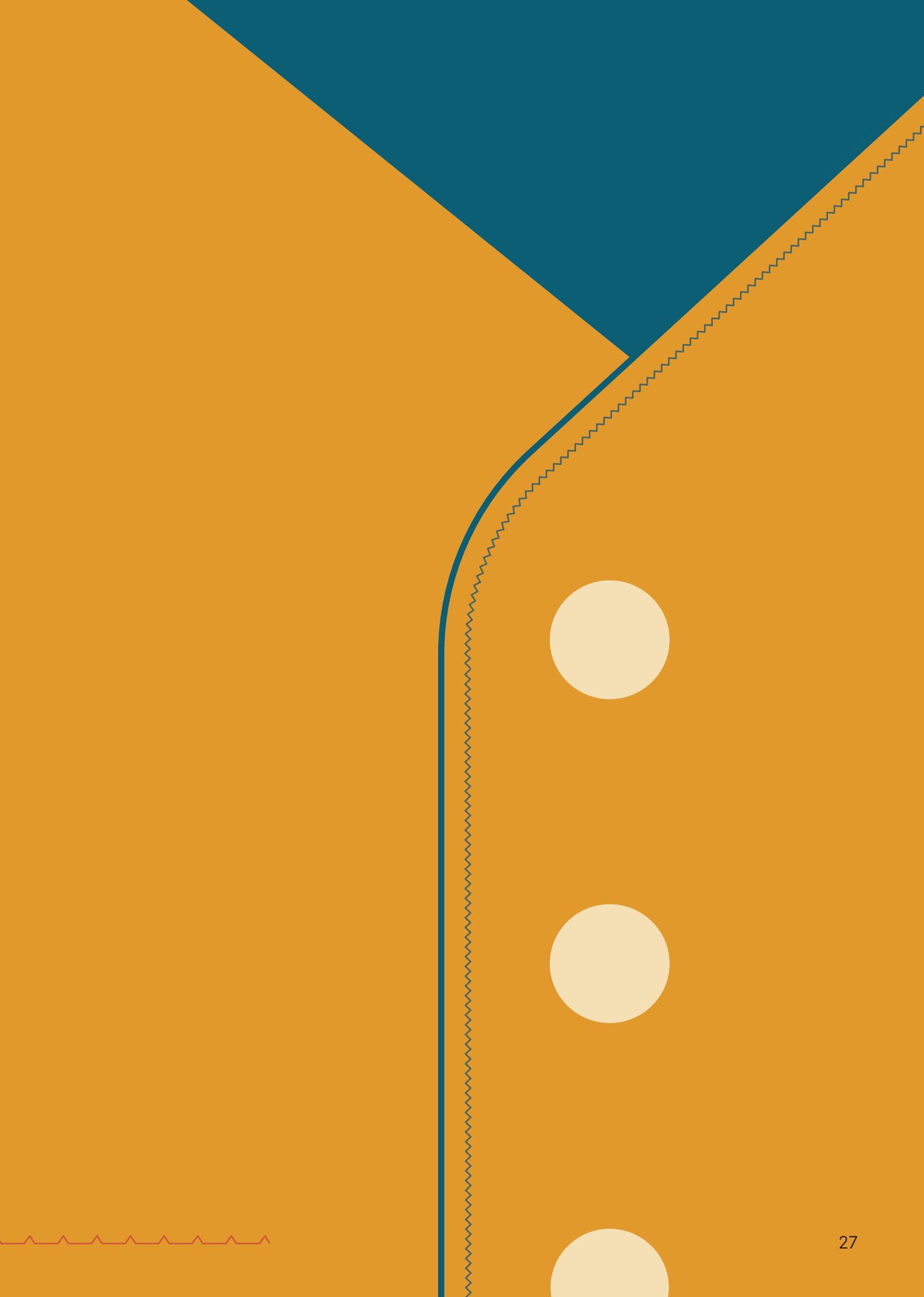
### German Social Code

Companies in the Federal Republic of Germany with more than 20 employees are obliged to ensure that persons with disabilities account for at least five per cent of their workforce.

They are also required to check whether any vacancies could be filled with individuals with disabilities. The Federal Employment Agency and the specialist integration services are on hand to support companies and employees in this matter.

Companies that fail to fulfil their obligation to employ persons with disabilities are required to pay a compensatory levy to the Integration







Office, which then uses this money to help integrate individuals with disabilities into the mainstream labour market.

## **German Act on Corporate Due Diligence in Supply Chains (LkSG)**

The requirements for human rights due diligence are becoming more stringent. The German Government adopted legislation in June 2021 based on the international requirements of the [UN Guiding Principles on Business and Human Rights](#).

Companies are required to establish a **robust risk management system** for averting or minimising negative impacts on human rights and the environment along global supply chains. Here the risk of discrimination against persons with disabilities should be taken into consideration. While small and medium-sized enterprises (SMEs) in the textile sector do not initially fall under the scope of the German Act on Corporate Due Diligence in Supply Chains (LkSG), it is apparent that such expectations are being increasingly passed on to suppliers and business partners.

## **International guidelines and goals**

The [UN Convention on the Rights of Persons with Disabilities \(CRPD\)](#) from 2006 is a UN international human rights accord that protects the rights of individuals with disabilities. Ratified by 182 states to date, the CRPD protects the civil, political, economic, social and cultural rights of persons with disabilities, and their right to an independent life. The Convention calls for international cooperation for its implementation. The CRPD has introduced the **social model of disability**, which considers disability to be the result of interaction between physically or mentally disabled persons and non-accessible environments/negative social attitudes. Disability is thus not part of a person, but rather imposed by society. The individual has physical or mental impairments and is prevented by society from participating on an accessible basis (see figure 7).



Impairment	+ barrier	= disability
Loss, or loss of function, of a body part or loss of a physiological function (including mental capacity), where 'loss of function' signifies a significant weakening compared to established statistical norms.	Environmental factors whose presence or absence limits a person's proper functioning and lead to a disability, such as physically inaccessible surroundings, a lack of suitable aids and/or a negative attitude towards persons with disabilities.	Disabilities arise from the interplay between individuals with impairments and attitude-related or environment-related barriers that hinder these individuals from participating fully, effectively and equally in society.
		Sources: <a href="#">World report on disability by the WHO (2011)</a> , CRPD (2016)

Figure 6: Impairment + barrier = disability

The basic principle of **non-discrimination** is mainstreamed within the ILO core labour standards. These labour and social standards of the ILO enjoy the status of human rights. ILO Convention No. 111 concerning 'Discrimination in Respect of Employment and Occupation' has been ratified by 175 states worldwide.

The United Nations' 2030 Agenda, in particular, the achievement of Sustainable Development Goal (SDG) 8 on Decent Work and Economic Growth represent a commitment by the international community to improving the situation for persons with disabilities on the labour market. **The basic principle of leaving no one behind is mainstreamed within the Agenda.**

## How do we achieve inclusion of persons with disabilities?

### Raising awareness of the issues among the workforces

Brands and retailers could commit to achieving inclusion and ensure that their employees are informed about inclusive practices and the soft skills needed to work productively with individuals with disabilities (e. g. social skills and inclusive language). Employee training could be delivered in cooperation with DPOs, with persons with disabilities serving as instructors.

Potential training topics could be existing prejudices, discrimination, inclusive language and rights of persons with disabilities relating to work and employment.

## Cooperation with disabled people's organisations

Engaging in dialogue with DPOs is an effective way of gaining an overview of living conditions for persons with disabilities. These organisations can also offer managers practical guidance on inclusion, for instance by advising on procuring aids for employees with disabilities and on legal aspects of inclusion and conducting workshops within the company.

It should be ensured when working with DPOs that cooperation is not limited solely to the provision of information, but rather that these organisations can also derive added value from the collaboration. Consequently, DPOs should be paid for their advisory services and, ideally, involved in implementing measures within the company.

## Physical barriers and accessibility

A strategic approach to initiating cooperation with DPOs is to jointly assess the physical barriers and accessibility of offices and factories. Companies in Germany and abroad can use the accessibility checklist in [Annex 2](#) to this end or devise their own assessment questionnaires. The questionnaires should examine the following areas:

- from the car park or public transport to the company entrance;
- from the company entrance to the employee's workstation;
- toilets;
- other company facilities, such as the canteen.

[Christoffel-Blindenmission Christian Blind Mission e.V. \(CBM\)](#) has developed a set of accessibility guidelines, which are available [here](#). Experience shows that physical barriers, unlike attitudes and political barriers, can be dismantled quickly.

## Appropriate precautions

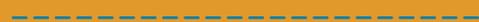
In addition to introducing measures to improve the accessibility of offices and production plants in general, it is also necessary to take appropriate precautions, i. e. measures that are implemented specifically for particular employees. These include the installation of furniture adapted to the requirements of persons with disabilities, such as an office chair for short individuals or software that enables the visually-impaired to operate computers and machinery.

## WHAT ARE DISABLED PEOPLE'S ORGANISATIONS?

Disabled people's organisations (DPOs) are member organisations that are run by and advocate for the rights of persons with disabilities. Some of these organisations represent individuals with a specific disability, while others work for persons with disabilities in general. In the case of DPOs for children with disabilities, the children are often represented by their (disabled and non-disabled) parents. With DPOs for persons with severe mental disabilities or those with multiple disabilities, family-based organisations often advocate for the rights of persons with disabilities.

Disabled Peoples' International (DPI) is an international umbrella organisation of DPOs. Another such organisation is the International Disability Alliance (IDA), which comprises 14 global and regional DPOs. Through these organisations, companies can contact national, regional and international associations.

DPOs operate independently, in coalitions or as part of national, regional or international (umbrella) associations.



# MODULE 1: RECOMMENDATIONS FOR BRANDS AND RETAILERS

## Overview of Module 1

Module 1 offers **practical aids** for implementing **measures for including persons with disabilities**, both within the company itself and at the facilities of its suppliers along global textile supply chains.

The **implementation aids are designed for brands and retailers.**

Account is taken of the unique features of both business models, along with their spheres of influence (and limitations) in regard to the size of the companies in question. Approaches to inclusion that are particularly suited to micro enterprises are identified in the process. At the same time, the module offers pointers on how large companies can leverage their market influence to bring about targeted improvements in working conditions for persons with disabilities at suppliers' sites such as garment assembly facilities and dyeworks. The brief guidelines are also suitable for providing an introduction to the topic.

## ECONOMIC BENEFITS OF INCLUDING PERSONS WITH DISABILITIES

Inclusion of persons with disabilities is important from an economic perspective. A study by the ILO entitled The price of exclusion: The economic consequences of excluding persons with disabilities from the world of work has shown that excluding Individuals with disabilities from the working population can reduce economic growth by between 3 and 7 per cent of the gross domestic product (GDP).

While there is an initial need for state investment (e. g. for inclusive education or rehabilitation measures), failing to promote inclusion incurs a far higher cost to the economy as a whole, for instance in regard to health-care expenditure and welfare spending.

Companies and organisations benefit from employing persons with disabilities and having a diverse workforce. This is seen, for example, in high job retention rates, a higher attendance rate and a better safety record than for persons without disabilities. According to a CBM study entitled The Economic Costs of Exclusion and Gains of Inclusion of People with Disabilities, employers consider persons with disabilities to perform as well as or better than individuals without disabilities in the workplace. The benefits of employing persons with

disabilities outweigh the arguments that the costs of introducing appropriate precautions and an accessible working environment are high and that it is not economically viable to have employees with disabilities. Higher workplace retention rates push down the costs associated with recruitment, hiring and training. Higher attendance rates result in fewer absences, and a better safety record reduces the need for insurance payments. These factors compensate for expenditure on appropriate precautions and accessible working environments.

Companies and organisations from around the world have proven that inclusion of persons with disabilities improves diversity and enhances the skills and satisfaction levels of the other employees. This leads in turn to productivity gains and a better overall working environment.

## BENEFITS OF INCLUSION

There are several arguments for including persons with disabilities in the mainstream labour market:

- The legislation will in future require large German companies to implement due diligence obligations in textile supply chains. It is also necessary to manage negative impacts on human rights at supplier firms.
- Retailers, investors and the general public increasingly expect companies to make a public commitment to respecting human rights and diversity.
- Companies that improve their social reputation within society generate higher revenues and profits.
- persons with disabilities have proven to be loyal company employees in the past.
- Inclusive companies often receive financial support from the state.

## Inclusion as an opportunity

Companies should view **inclusion as an opportunity**. Persons with disabilities can make a valuable contribution to the success of the company. Practical experience at companies has shown that individuals with disabilities are often productive and reliable employees and that inclusive firms generate higher revenues. By taking on social responsibility, companies enhance their reputations and at the same time become more attractive as employers and business partners.

## What is appropriate and realistic?

Small enterprises could adopt a pragmatic approach. There are results that count, not the amount of paperwork. However, the larger the company, the greater the need for responsibilities and processes to be formalised.

Larger companies, for instance, could appoint an inclusion officer and draw up action plans for practical implementation.

If a company with ten employees has one person responsible for sustainability, purchasing and quality, then there is no need to establish an inter-departmental team to make purchasing processes more inclusive. The responsible individual already possesses the necessary knowledge from both areas. However, a **micro enterprise** of this kind should still define minimum procedures to ensure that expertise and knowledge remain within the company even when the responsible person is absent for a longer period of time or leaves the company.

A **large brand** with several thousand employees and many different locations in Germany and abroad, on the other hand, should establish a structure to enable the company to intelligently pool the existing knowledge from the different departments. It is essential to have clear responsibilities and procedures. This type of approach allows measures to be implemented on a targeted basis in order to identify a lack of participation at supplier firms and manage the situation accordingly. This is exactly where Module 1 comes in, providing pointers as to how measures for the inclusion of persons with disabilities can be implemented step by step.

# Step 1:

## Align policies: strategically mainstream inclusion

### Tackle inclusion systematically

**Inclusion** should be viewed as a **strategic issue** and embedded step by step into the management processes. A systematic approach makes it possible to pool existing knowledge and implement the strategy on a structured basis. It is also advisable for SMEs to tackle the topic strategically and build on the (informal) processes. The approach should fit the company.

The topic of inclusion could be addressed using a **twin-track approach**. Disability mainstreaming can be viewed as a cross-cutting issue and taken into account in all processes within the company and along the supply chain (track 1). At the same time, those affected can be supported on a targeted basis through **appropriate measures** and experience greater empowerment in their working lives (track 2). See also [Figure 4 on page 14](#).

### Commitment to human rights: a question of attitude

The concept of human rights due diligence involves companies establishing a robust risk management system in order to manage fundamental risks related to society, the environment and compliance within the company's own four walls and along global supply and value chains. **Companies should commit to respecting human rights and gear their policies towards human rights and environmental conservation.**

The **commitment to human rights (UN CRPD; ILO core labour standards) should be expressed by the senior management**. Only if support is provided by the management the necessary resources can be strategically mainstreamed and made available. This basic principle applies to all companies, regardless of their size or position in the supply chain.

### Mainstreaming human rights in the policy statement

The company publicly expresses its commitment to human rights and environmental conservation in its **policy statement**. The responsibility of companies and suppliers is formulated on the basis of international human rights standards. The format can be adapted to the needs of the company. The policy statement, for example, can be codified in the form of a declaration, a voluntary commitment, a code of conduct or a set of guidelines. Large companies tend to publish their own





declarations. In SMEs, the principles are also formulated by making reference to a code of conduct (For more information, please refer, for example, to the information paper on policies of the Textile Partnership or the 'SME Compass' of the Helpdesk on Business and Human Rights and GIZ). While the policy statement can be kept brief, emphasis should be given to **interaction with especially disadvantaged (vulnerable) groups**. The company sends out a strong signal to suppliers and its customers when it makes a public commitment to the inclusion of persons with disabilities.

## Step 2: Sector risk: managing discrimination against persons with disabilities

Risks should be recorded and analysed on the basis of the public commitment to human rights and environmental conservation. Initially, it is essential here that the company places itself in the position of the **affected parties**. The risk analysis is not about managing financial risks for the company itself, but rather focuses on the (potential) negative impact on the human rights of affected parties. Particular attention should be given in this process to disadvantaged groups.

### First: understand your own risk profile

Before measures for greater inclusion can be implemented, companies should first identify and evaluate their risks. **Potential country and product-specific risks** are recorded initially. This is about looking at the different stages in the textile supply chain in order to understand the particular risks that can arise at the different stages of manufacturing. What are working conditions like in the cotton fields and the factories? Do employees with disabilities have any access to the workplace? Is there legislation in the producer country that disadvantages persons with disabilities? Are all employees treated equally?

There are a whole range of risks in textile manufacturing and processing, such as **a lack of job security, low wages and a lack of employee representation**, which can have an especially negative impact on persons with disabilities.

As the next step, companies should clarify the extent to which the issues identified apply to their own organisation and to their suppliers. The priority is to **pool existing knowledge**. Is there knowledge of the working conditions at suppliers? Are there any certificates or auditing





## INCLUSION IN TEXTILE MANUFACTURING IN EGYPT

The Egyptian manufacturing partnership of People Wear Organic attaches great importance to inclusion and shows that this kind of approach can also be economically successful. NatureTex, a textile company of the SEKEM Initiative, promotes dialogue, exchange and cooperation between persons with and without disabilities. The company has established several parallel processes. Individuals with disabilities are taken into consideration. In addition to the manufacturing facility, there is also a school and a sheltered workshop for persons with disabilities on the company premises. There is lively exchange between these facilities and the SEKEM farm companies. Persons with disabilities are regularly taken on as permanent employees at the factory. Cooperation is a matter of course, and everyone celebrates the annual SEKEM festival together. In this way, prejudices are dismantled and respectful interaction with one another is promoted. Inclusion has enriched the SEKEM community.

reports? Are there any reports on experiences of sector initiatives or joint projects?

During the risk analysis consideration should be given to the question of the extent to which individual risks, such as insufficient safety features for sewing machines or a lack of emergency escape routes in the factory, could impact upon persons with disabilities.

## **Second: prioritise the risks**

In order to decide how to best support suppliers with the issue of inclusion, it is necessary to **evaluate and prioritise the identified risks**. Companies should orientate themselves in this context on the likelihood and severity of the negative impact.

Audit reports can serve as a key source of information and should feed into the risk analysis. Nonetheless, the extent to which the **standards and labels** truly cover the topic of inclusion should be critically examined.

An analysis should also be carried out to determine which risks would have the greatest negative impact on the affected parties. It is initially inconsequential in this context whether or not the risks could be managed by the company. When it comes to the topic of inclusion in particular, structural challenges may arise that cannot be tackled by one company alone. These might include non-accessible infrastructure in the producer country or inadequate social security systems.

Nonetheless, there will also be many topics where companies can influence their suppliers, be it through formulating expectations (e.g. in purchasing contracts) or providing targeted support (e.g. in the form of training).

A materiality matrix illustrates the gravest challenges and lays the foundation for implementing risk-based measures. This method can be used to visualise and compare risks in terms of their severity and likelihood.

## Step 3: Implement measures for greater inclusion and participation

Companies can implement a **wide range of measures** in order to improve inclusion and participation within their own organisation and along their supply chains. To put the question concisely: do persons with disabilities have a chance on the labour market, and if so, under what conditions?

### Understanding challenges

There are a number of **structural challenges** that hinder the employment of persons with disabilities, especially in low-wage countries. The lack of accessible local public transport makes it impossible for individuals with disabilities in some countries to even reach the factories.

**Price pressure** within the sector presents another challenge.

Accounting is often based on the number of units and **lead time**. This system makes it difficult to include persons with disabilities in work processes. The work is fast-paced and so individuals have to adapt to their environment, not vice-versa. Depending on a person's with disabilities level of impairment, he or she may not be able to do such jobs without additional support.

Finding the right approach here requires a great deal of effort on the part of both the supplier and the respective brand or retailer. A solution can only be found by inclusive buyers and inclusive suppliers working together constructively.

One possible approach is for dedicated production chains (own production lines) to be established within factories, geared to the specific needs of persons with disabilities. Consideration can also be given to whether persons with disabilities could take on other roles in the factory, such as administration or cleaning. This is a topic that requires not only a willingness to change on the part of suppliers, but also a commitment from brands and retailers to show patience during this transition and, if necessary, to pay a premium for the goods.

On an interpersonal level, individuals with disabilities encounter prejudice and/or are not treated equally. **Prejudices** can be deeply rooted within society and people are not always aware of them. Tackling these prejudices is key, but it is at the same time a complex endeavour. Personal interactions, dialogue and education are the most effective means of changing attitudes towards persons with disabilities. Employing individuals with disabilities at the company (whether in-house or at a supplier) could be an approach here to progressively dismantle prejudices.

## ENSURING ACCESSIBILITY OF MANUFACTURING FACILITIES

Physical barriers also exist inside of factories. In countries such as China, Bangladesh and India, goods are usually stored on the ground floor, with production often taking place on the upper floors. There are no lifts, making it difficult for individuals with physical disabilities to access the workplace in the first place.

However, the situation differs from country to country. In Tunisia, for example, inclusion measures are easier to implement due to the way the country's factories are constructed.

Companies could include the presence or absence of structural challenges as a criterion when selecting new suppliers. Even if a potential Tunisian supplier were not already actively addressing the topic of inclusion, it would still be better placed from the outset to implement inclusion measures at factory level if the factory in question met at least the structural prerequisites for enabling persons with disabilities to access the workplace.

## Mainstreaming inclusion within the company

If persons with disabilities are to be given the opportunity to participate in the mainstream labour market, then it is important to give consideration from the **application stage** onwards to how this might be achieved. The [Integration Office](#) branches (site available in German only) offer practical assistance to companies.

Figure 8 below shows that the focus in an inclusive company is on the person and not the personal disability or the assignment of a label to that individual.

If a company wishes to intentionally promote inclusion measures, then it should begin by appointing a **responsible person within the company**. Larger companies can set up a point of contact for issues of inclusion and diversity. For small companies, there is no need to set up any complex structures, though an individual should still be appointed to assume responsibility for the topic.

## Inclusion in procurement

If a company intends to intentionally promote inclusion measures at its suppliers, then it should integrate the topic into its **purchasing processes**. It is advisable in this context to engage in **dialogue and exchange** to learn more about the mindset and practical approaches of suppliers and to offer support. Existing structures should be used and expanded. One option could be to proactively address the topic of inclusion when visiting the supplier. In order to keep the workload to a minimum at the start, companies should begin where they are already engaged in dialogue and cooperation with supplier firms. When evaluating suppliers, consideration should be given to the extent to which they incorporate inclusion into their working environment. Audit reports (provided they cover the topic of inclusion), questionnaires for suppliers (self-assessment) and factory visits are all practical tools in this context. Expectations placed on suppliers can be formulated on the basis of policies (supplier's code of conduct; incorporation of inclusion into contracts with suppliers).

## Standards and labels

Companies often use standards and labels to aid risk management. While they contribute to the improvement of working conditions, companies should critically examine the extent to which these standards and labels actually cover the previously identified risks in the area





Figure 7: Tips on interacting respectfully with persons with disabilities

of discrimination against persons with disabilities. If, for example, an audit report fails to give any consideration to accessibility at the factory entrance, then the associated certificate indicates nothing about whether persons with disabilities can actually access the workplace. Many sustainability standards do not yet cover the topic of inclusion (in full). One approach could be to engage in direct dialogue with the respective standard-setting organisation or to make use of one of the advisory and support services listed in [Annex 1](#).

### Offering support

If the topic is to be communicated to the supply chain, it is not usually sufficient for a brand or retailer to simply convey certain expectations to its suppliers. Instead, consideration should be given to how the company can also offer targeted support.

Companies should seek to engage their suppliers in dialogue in order to better understand their needs. It makes a difference whether



they are lacking expertise, a willingness to take action or financial resources.

One starting point: **training for supplier firms**. Generally speaking, smaller companies do not have the resources to conduct their own training courses. A check should be conducted to determine which local partners would be suitable for implementing the measure at factory level. It is advisable, for instance, to engage with standard-setting organisations or member initiatives such as the [Fair Wear Foundation](#) (FWF), the [Global Organic Textile Standard](#) (GOTS) or the [amfori Business Social Compliance Initiative](#) (amfori BSCI), and with local NGOs and DPOs to find out whether inclusion training is offered now or will be offered in future. A key issue in this context is cost. Suppliers often lack the financial resources to fund such courses for their employees. Many SMEs in Germany are also unable to cover the costs of training. It is important that both parties seek to talk to one another and that they establish a common understanding.

German development cooperation provides **funding** for training measures. There are networking and advisory services, such as the [Partnership for Sustainable Textiles](#), [Business Scouts for Development](#) and the [Helpdesk on Business & Human Rights](#), which companies can contact free of charge for specific information about funding and financing opportunities.

Another option is to join **sector initiatives** or participate in joint programmes locally, whether as part of development cooperation projects such as the [Better Work Programme](#) of the ILO and the International Finance Corporation (IFC), or with the assistance of development partnerships with the private sector. Companies should examine whether there are any measures already being implemented in the respective region (or even at factory level) that they could become involved in.

## Step 4: Measure and communicate progress

If improvements in inclusion are to be reported, progress must first be measured. It is advisable for a company to consider which goals it wishes to achieve when designing measures. The situation at supplier firms should be monitored and documented. **SMEs can tackle the topic pragmatically and start where they are.**

A common means of measuring progress is to **determine key performance indicators** (KPIs). It is possible to define both qualitative and quantitative goals in this context. For instance, companies can record the number of suppliers that they have checked to determine whether they already implement inclusion measures, or the number of employees in a given factory that have participated in inclusion training ([see Annex 2](#)).

They can also monitor whether real **changes** have been achieved **at factory level**. Companies can record, for example, whether certain measures, such as the appointment of an individual responsible for inclusion, have been implemented or whether a complaints office has been set up.

If the company has made a public commitment to inclusion and is actively addressing the issue, these achievements can feed into the communication strategy. Attention could be drawn to positive examples, though companies should also not shy away from **proactively communicating on specific challenges**. The fact that the company is addressing the topic sends out a strong signal, even if it is not possible to resolve all the issues overnight.







## Step 5: Create contact structures for affected parties

### Ensure access for persons with disabilities

Effective channels are needed for dealing with complaints to actively tackle discrimination in the workplace. As far as possible, **contact structures for affected parties** should be established where conflicts arise in order to solve problems as easily and simply as possible. So, it is not beneficial to address the topic of complaints

mechanisms with a one-size-fits-all solution. Instead, efforts should be undertaken to determine which approaches are most appropriate at each stage of the supply chain. This certainly does not mean that German brands and retailers must establish complaints channels for the entire supply chain. However, the topic should be taken into consideration to enable solutions to be devised in cooperation with suppliers (For more information on the requirements for effective complaints mechanisms, see, for example, the information paper 'Ensure and support access to remedies and grievance mechanisms' by the Textile Partnership). When establishing complaints procedures for affected parties or providing support to suppliers, it is necessary to bear in mind that the contact structures should also be accessible to persons with disabilities. Can these procedures also be accessed by individuals with impaired vision and/or hearing? What is being done to ensure that the complaints channel provides persons with disabilities a safe space for them to raise their concerns in a prejudice-free atmosphere? Is there a read-aloud function for forms or aids for completing them, for instance for persons with visual impairments? Can sign-language interpreters be involved in the process?

In order to reduce barriers to access for persons with impaired vision and/or hearing, the complaints channel should offer a range of methods for submitting complaints. These could include the telephone, email, letters and voice messages via a messenger service. In some cases, it is also advisable to employ ombudsmen, who enjoy a particular level of trust among affected parties, so that topics can be addressed in a safe space.

The **findings of the risk analysis** can provide a good basis for exploring the particular challenges facing persons with disabilities in order to take account of potential barriers.

Companies should check whether **complaints channels are already covered by existing certificates** and standards, such as NATUR-TEXTIL IVN zertifiziert BEST (IVN BEST), Fairtrade or GOTS. The Fair Wear Foundation, for example, requires the introduction of a

complaints procedure at factory level and operates as a neutral intermediary in the process. Another option could be to participate in an external complaint procedure, for instance via the [Bangladesh Accord](#). In some cases, associations and multi-stakeholder initiatives provide good starting points for German companies. The Textile Partnership, for instance, is working on getting several Partnership members to embark together upon a process of establishing effective complaints channels at the level of the supplier factory. Companies should also check whether DPOs can be involved in the process. Regardless of the approach, it is necessary to recognise that not only should the complaints procedure function effectively, but also that its contact structures can be used on an equal basis by persons with disabilities in particular.

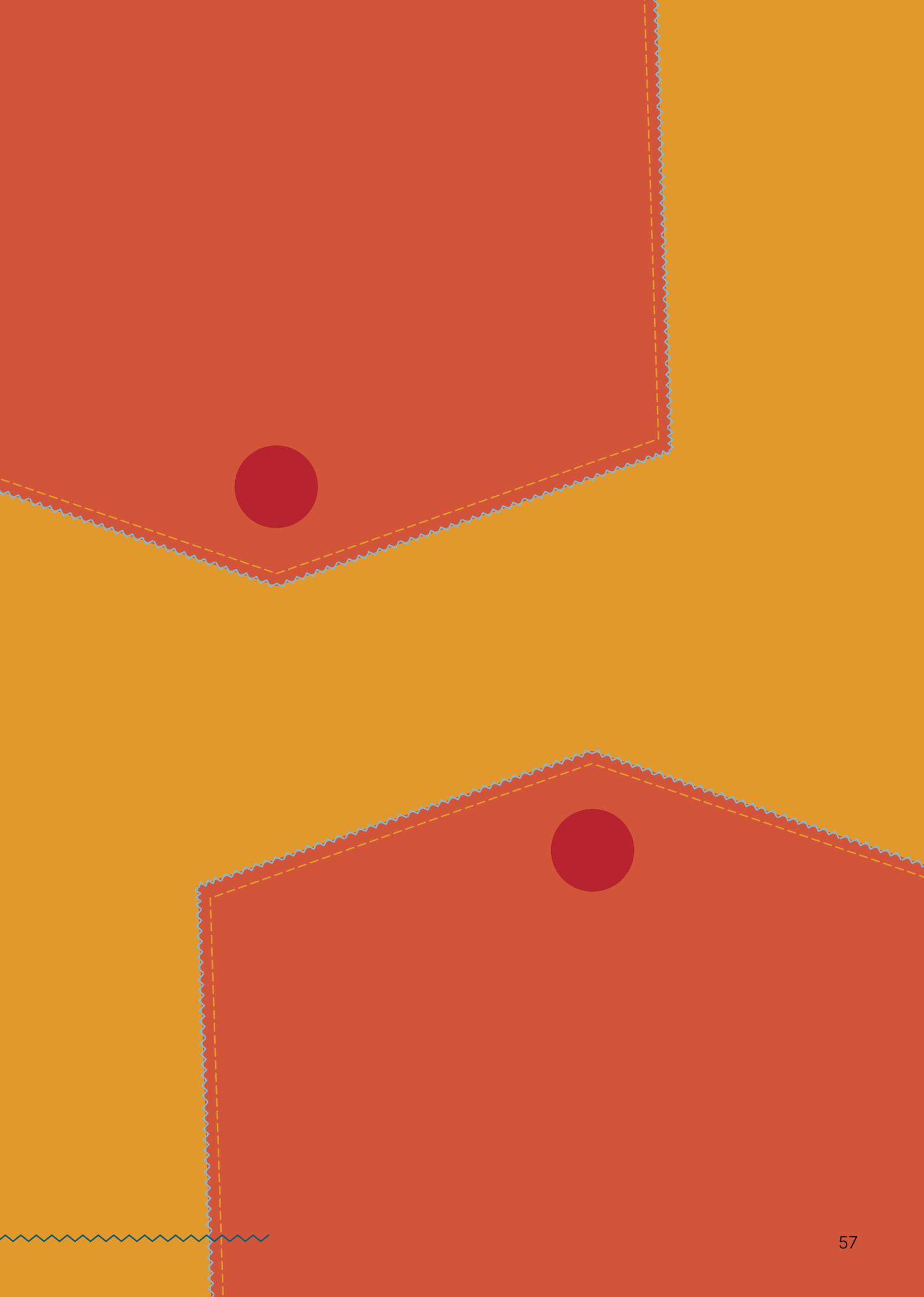
In order to reduce barriers to access for persons with impaired vision and/or hearing, the complaints channel should offer a range of methods for submitting complaints. These could include the telephone, email, letters and voice messages via services such as WeChat, Line, Telegram and WhatsApp. In some cases, it is also advisable to employ ombudsmen, who enjoy a particular level of trust among affected parties, so that topics can be addressed in a safe space.

The **findings of the risk analysis** can provide a good basis for exploring the particular challenges facing persons with disabilities in order to take account of potential barriers.

## **Provide remediation**

Affected parties should not only have the option of addressing their concerns; a good complaints management system also includes **remedial measures**. The affected persons should be included in order to allow the creation of solutions that work effectively for everyone involved. A focus should be placed in this context on the needs of persons with disabilities. They should be able to raise their issues in a non-judgemental atmosphere of trust and be satisfied with the remedial measures employed. In individual cases, the solution could involve removing specific barriers or overcoming discriminatory practices such as the payment of different wages or a lack of compensation for victims.







# MODULE 2: RECOMMENDATIONS FOR SUPPLIER FIRMS

## Overview of module 2

This module is primarily aimed at **manufacturing companies** in the textile sector (spinning mills, weaving mills, dyeworks, manufacturing facilities and textile finishing factories, etc.).

The following pages identify ways of tackling the topic of inclusion within the company itself in cooperation with brands and retailers. The goal is to provide better access to employment and improve working conditions for employees with disabilities. Expectations for the corporate due diligence activities of brands and retailers are currently increasing. Greater attention is being given to the prohibition of discrimination and the implementation of decent working conditions. Customers in industrialised nations are also attaching more and more importance to fairly-produced clothing. Pressure is mounting for manufacturing companies to address inclusion of persons with disabilities. This provides positive momentum for proactively tackling the issue.

### Inclusion as an opportunity

Module 2 shows how the topic inclusion can be addressed and provides practical aids for implementation, examining practical obstacles and challenges in the process. Companies can **view the topic as an opportunity**. By making a strong commitment to inclusion and participation, they can send a signal to purchasing companies that they are dedicated to promoting the interests of their entire workforce. This can bring benefits for both parties. Customers would enhance their image and the manufacturing firm would secure orders and benefit from an enhanced reputation itself. At the same time, experience shows that there is also a business case for inclusion and that companies benefit from satisfied and motivated employees.

## **FAKIR FASHION LIMITED**

The Bangladesh firm is firmly committed to promoting the interests of persons with disabilities. Chief Executive Officer (CEO) and Head of Business Abdullah Al Maher stressed during the interview the importance of a dedicated senior management team and of the tone from the top when it comes to implementing changes.

At Fakir Fashion Limited, the CEO speaks with his employees with disabilities once a month to get to know their stories. He visits their workstations to gain an understanding of the everyday challenges they face and observe the situation first hand.

His personal commitment is actively passed on to the workforce. He says it is necessary to discuss the prejudices of workers in order to effectively include persons with disabilities in the company. All in all, the company has had very positive experiences with employees with disabilities, whom Abdullah Al Maher describes as hard-working, reliable, modest, highly productive and loyal individuals.

The goal is to further dismantle prejudices and engage in active dialogue with brands and retailers in order to tackle the topic together.

The topic of inclusion should be addressed systematically and integrated into **company processes**. This module shows how textile manufacturing firms can tackle the issue step by step.

## Step 1: Establish inclusion as a basic principle

### Commitment from senior management

It is essential to secure a **commitment from the senior management** if inclusion is to be established as a basic principle within the company. Persons with disabilities are stigmatised in many societies. While the situation has slightly improved in recent years thanks to education and basic legislative adjustments, prejudices and reservations regarding disability are still widespread.

A company needs to convince its own workforce, both workers and specialists/managers, of the importance of interacting on a peer-to-peer basis with team members that have physical and/or mental disabilities.

If the management drives the topic of inclusion and **leads by example**, it can place a greater focus on the positive contribution that persons with disabilities make to a company's overall success. In order to **convince employees of the importance of the issue**, it may be helpful for the senior management to get involved personally and send a signal to the workforce about the high value the company attaches to fair interaction and acceptance. Fakir Fashion, a company from Bangladesh, shows how this can be done.

### Mainstream inclusion in policies

The principle of inclusion should be added in writing to **policies and procedures**. It is important that the company commits to human rights and environmental conservation in its corporate principles. Here consideration should also be given to freedom from discrimination, which is mainstreamed as a human right within the ILO core labour standards.

One way of mainstreaming the topic within internal guidelines and policies is to devise a package of inclusion measures. A company could, for instance, establish 'Ten golden rules' on inclusion of persons with disabilities, and mainstream the goals in annual action plans.

## Step 2: Understand and manage the risks of inadequate inclusion

Before inclusion and participation measures can be implemented in factories, it is first necessary to analyse and evaluate the risks, that is, the **negative impacts on human rights**. There is a range of topics within each company that can be examined.

### Risks during recruitment

The first question to ask is whether any consideration is given to individuals with disabilities whatsoever during the **recruitment** process. Checks should be carried out for new vacancies to determine whether particular tasks could be completed by individuals with disabilities, and if so, the conditions needed to prevent them being excluded from the recruitment process. The HR department and the floor supervisor should be involved at this point.

### Physical barriers

The next step involves checking the **physical situation** in the factory. Are ramps and lifts installed to enable persons with physical disabilities to access the workplace? Are workstations set up as standing workstations, despite it being possible to complete certain tasks while sitting too? How is access to emergency escape routes ensured? Which safety precautions are being implemented for the machinery? The accessibility analysis should also consider the journey to the workplace, even though the company would be unable to resolve any potential structural challenges on its own. If, for instance, individuals with disabilities are not even able to get to work due to a lack of infrastructure, this question could be addressed at association level or in dialogue with policy-makers.

### Cultural barriers

In addition to the physical barriers, attention should also be paid to the **corporate culture** and any discrimination in the workplace resulting from bullying.

Ideally, the company should include in its considerations the question of whether direct suppliers are already addressing the topic of inclusion. This approach helps to send a signal to those in purchasing, such as in brands and retailers, that inclusion is taken into account not only at the supply stage of the manufacturing process, but also in the upstream stages.

## **'TEN GOLDEN RULES': MAINSTREAM INCLUSION AS A GOAL AT STRATEGIC LEVEL**

- Publicly communicate the commitment of the senior management to the issue (policies)
- Establish a work culture that counteracts stigmatisation and prejudice (training)
- Make new job offers to persons with disabilities (strategy)
- Address individuals with disabilities directly in job advertisements
- Increase the percentage of persons with disabilities within the company
- Afford employees with disabilities the same access to training as other employees (training)
- Dismantle infrastructural barriers (measures)
- Share best practices with the workforce to show how inclusion can be put into practice (tone from the top)
- Seek dialogue with external partnerships (e.g. DPOs)
- Call upon purchasing companies to provide support (dialogue and exchange)

The risk analysis should examine the overall working conditions for persons with disabilities. Are there specific physical barriers associated with the job which make it harder for individuals with disabilities to access the workplace or carry out certain tasks? Are persons with disabilities treated fairly or do they face discrimination? Companies can examine this question and other questions in their risk analysis.

### **Bring in external expertise**

It may be beneficial to let the **expertise of DPOs** inform the process in order to better understand the problems and challenges. It is important to take note when working with DPOs that there is often a divide between companies and DPOs. Consequently, cooperation should not be viewed as a contract with a consultancy firm, but rather as a long-term investment with the goal of creating an inclusive corporate culture.

It is also advisable to **seek dialogue with the brands and retailers** while the risk analysis is being conducted. In so doing, the company signals its willingness to proactively address the issue of inclusion and also gains a clearer view of potential challenges. At the same time, the risk analysis lays the foundation for implementing risk-reduction measures, which can also be executed with the financial and technical support of brands and retailers or German development cooperation. When it comes to the risk analysis, it is important to adopt a **systematic approach** and assess the individual risks in order to identify which measures should be given greater priority for implementation. [Annex 2, 'Accessibility checklist'](#), provides an overview of the potential challenges and risks that could potentially arise in relation to physical barriers to inclusion and need to be managed.



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## TEXT BOX: BUDDY SYSTEM

Persons with disabilities who have just joined the company should be able to request an individual onboarding process. This is where the buddy system comes into play. Buddies are employees who are on hand to provide advice and support to new team members. For employees with disabilities, a buddy can make a real difference, for instance, if they need to know the way to certain rooms or buildings or if they are unaware of whom to contact with their questions. A buddy system is based on a conviction that vulnerable people have a right to be involved as citizens in society and that society should attempt to be more open and supporting to them. By serving as buddies, employees without disabilities can gain valuable insights into the questions and issues of persons with disabilities. It is important to bear in mind that a buddy system benefits both parties.

## Step 3: Implement measures at factory level

There are a large number of measures that can be implemented in a company to make the workplace more inclusive. It is important to address the topic systematically and **integrate inclusion into existing processes and structures**. The measures should be compared with and build upon the findings of the risk analysis (step 2).

The physical barriers previously identified should also be analysed in order to determine the extent to which remedy can be provided. Is it possible (and financially viable) for persons with disabilities to be given **access** to certain workplaces? Can standing workstations be transformed into sitting workstations and, if so, will this require specially designed equipment?

### Determine responsibilities

In the first step, it is necessary to appoint an **individual within the company with responsibility** for coordinating the topic centrally. In larger firms, this role can also be combined with the establishment of a contact point for inclusion and diversity. In dialogue with DPOs and NGOs, these individuals could assume an advisory function in their companies on the topic of inclusion.

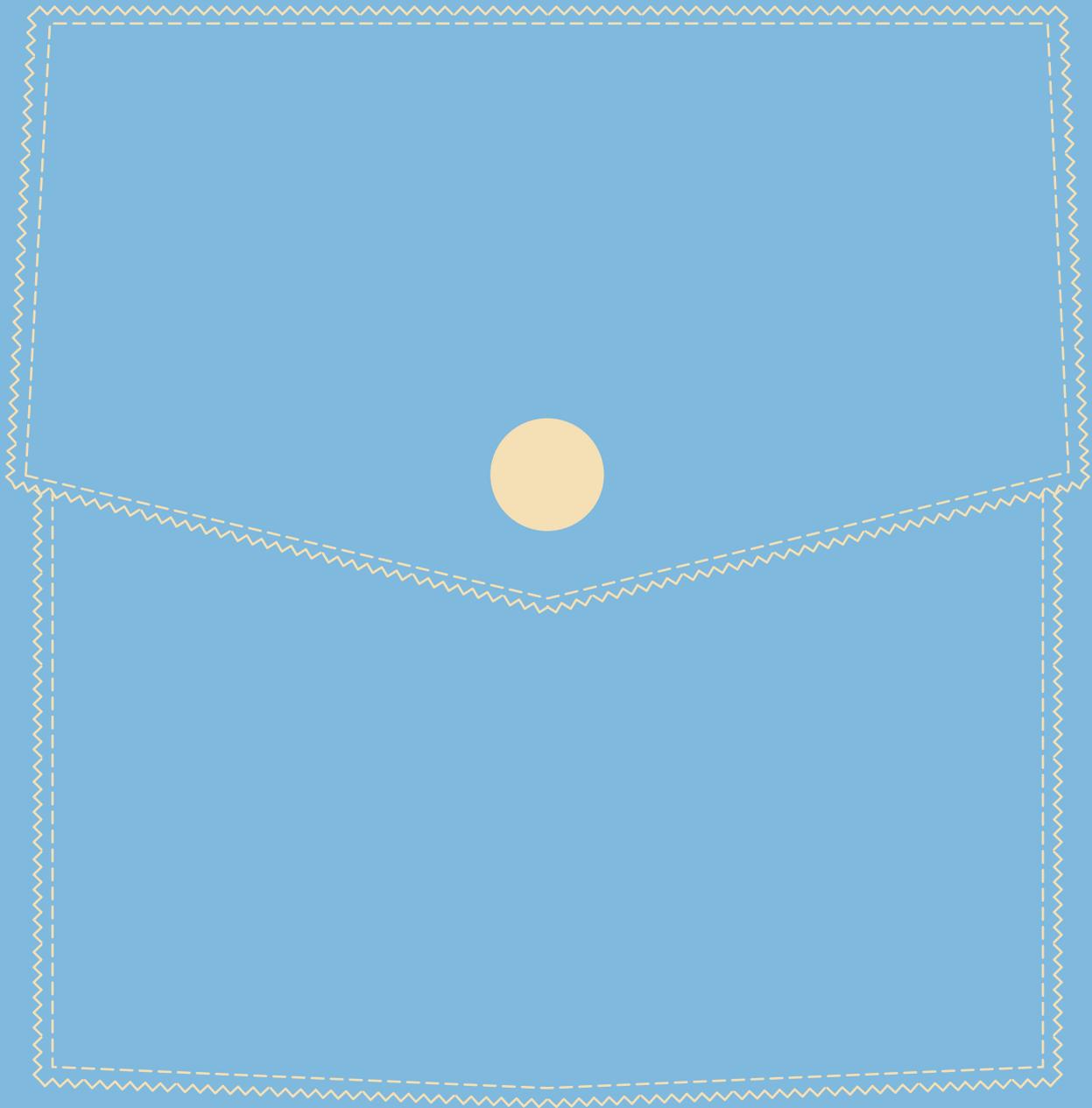
Larger companies can set up an in-house **point of contact for issues of inclusion and diversity**. This contact point is responsible for assisting all departments with implementing corporate guidelines on the topic of inclusion. It should also implement a monitoring system that records the extent to which corporate inclusion guidelines are being implemented.

Additionally, options should be examined for integrating the topic of inclusion into the activities of existing working groups and teams within the company, e. g. **employee representatives, brand committee and complaint handling**.

It may also be expedient to create specific offers for persons with disabilities, e. g. a **buddy system**, to enable the affected individuals to talk to trusted contacts.

### Incorporate inclusion into the recruitment and application process

It is important to ensure that recruitment and application processes are accessible. Job advertisements should directly address individuals with disabilities and/or encourage them to apply for the job. The



recruitment team should have had their awareness raised about inclusion and embark upon the process free of prejudice. **Involving persons with disabilities in the recruitment team** can have a positive impact and send a signal to applicants that their needs are taken seriously. It is important to ensure that the rooms chosen for job interviews are accessible. This means that ramps have been added to stairways and that there should be sufficient space for wheelchair users. Another task in the inclusion process is to raise awareness among HR department staff of the topic of persons with disabilities.

### **Create and implement solutions jointly**

It is important when implementing measures to seek **dialogue with brands and retailers** in order to share experiences and discuss options for financial or technical support.

Consideration can be given to how far certain **voluntary sustainability standards and labels** cover the topic of inclusion, so that the associated requirements can be checked during factory audits. However, most standards do not cover inclusion to a sufficient degree. It is worth waiting for further developments in this area and reviewing this approach again at a later time.

**Annex 2, 'Accessibility checklist'**, provides an overview of measures than can be implemented at factory level.

Providing employee **training** can be a good approach for improving the situation in the factory. As part of its development cooperation work, the German Federal Government provides **funding** for this purpose, which can be applied for with assistance from the brands and retailers. Funding is also available for local companies in some cases. In certain circumstances, the funding could be used for integrating inclusion to a greater extent into the company's processes or to raise awareness among employees with and without disabilities of the topic of inclusion.

**Annex 1, 'Advisory and support services'**, provides guidance for identifying suitable contact people.



## Step 4: Communicate expectations and best practices

If manufacturing companies wish to **proactively address the topic of inclusion**, they need brands and retailers who accept their goods. This is about whether the business partners are willing to pay higher prices or to compromise on the flexible adaptation of orders. It is important for a company to first define its own internal expectations and express its strategy in the form of **KPIs**. One approach could be to gradually increase the number of employees with disabilities over a specific period of time, or to realise qualitative measures to make the workplace more inclusive. At the same time, the topic should be proactively communicated to the company's customer base (and its own suppliers). Manufacturing companies can also proactively address inclusion with the local community and thus lead by example. Looking at the growing demands of customers in industrialised Western nations and the increasing legislative codification of due diligence requirements in Europe, the **topic of inclusion** could be viewed as an opportunity for manufacturing companies to distinguish themselves from their competitors. Successes can be celebrated and communicated to the outside world.

## Step 5: Establish complaints procedures

**Employees** should be able to address their concerns within the company in a safe environment and as **easily and simply** as possible. It is especially important here that employees are assured that they have nothing to fear in the way of penalties or sanctions. This basic principle should also be put into practice, as trust and a clearly defined, transparent process are key pillars in a well-functioning complaints procedure. In this context the particular needs of persons with disabilities should also be taken into account.

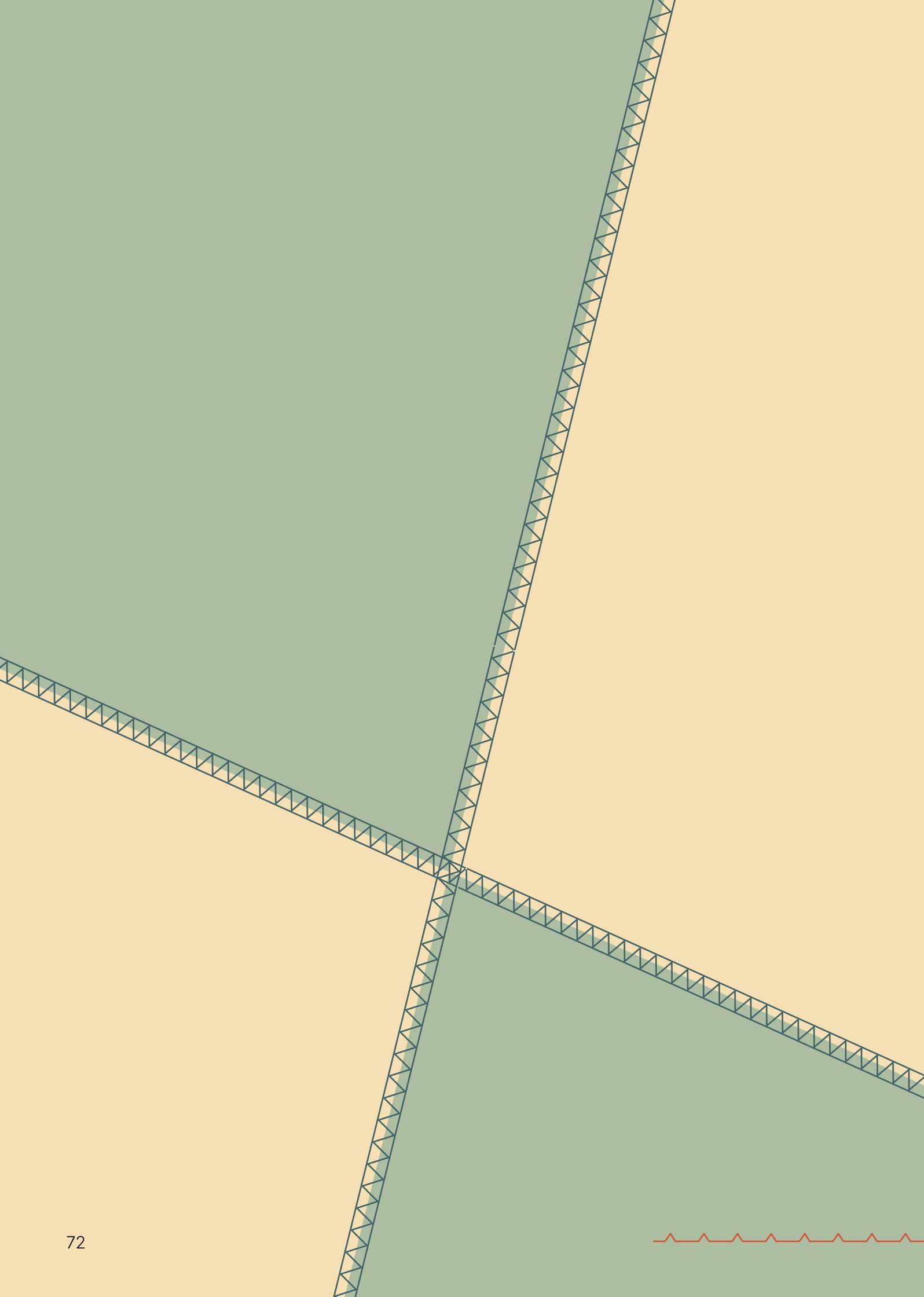
Is the complaints procedure accessible to employees with disabilities? Is the approach considered fair and legitimate? Is the procedure explained transparently to all employees?

Establishing an effective complaints management procedure is a longer-term process. It may be beneficial to set up a joint procedure with external partners such as DPOs, business associations, local NGOs and German development cooperation organisations or even with business partners. **Everything must be based on trust in this context.**



One key component of complaints management is that it provides not only for the logging of complaints, but also for the provision of **remedy**. The focus in this context is not primarily on financial compensation (though this is an important issue in the case of grave violations), but rather on the complaints procedure addressing the problem at the point where it arises and de-escalating it as easily and simply as possible. Remedy can range from a simple apology to financial compensation payments and even mediation and cultural change.





# ANNEXES

## ANNEX 1: List of advisory and support services

### Disabled Peoples' International

Disabled Peoples' International (DPI) is an umbrella organisation of disabled people's organisations (DPOs). The website provides contact details for national DPOs.

Contact: [www.disabledpeoplesinternational.org](http://www.disabledpeoplesinternational.org)

### German Federal Employment Agency

Advises companies on employing disabled people.

Contact: [www.arbeitsagentur.de/unternehmen/finanziell/foerderung-menschen-mit-behinderungen](http://www.arbeitsagentur.de/unternehmen/finanziell/foerderung-menschen-mit-behinderungen) (German only)

### Helpdesk on Business & Human Rights

The German Government's Helpdesk on Business & Human Rights offers advice, training and dialogue to companies free of charge on the subject of corporate due diligence. Companies receive targeted aid through supporting and financing instruments for implementing measures at supplier firms. The online tools 'CSR Risk Check' and 'SME Compass' are also available free of charge in German and English.

Contact: [wirtschaft-entwicklung.de/en/helpdesk-on-business-human-rights/](http://wirtschaft-entwicklung.de/en/helpdesk-on-business-human-rights/)

### ILO Global Business and Disability Network

The International Labour Organization's inclusion network promotes a respectful and open work culture. The platform promotes dialogue between companies from different sectors and also supports implementation of national initiatives to foster inclusion in the workplace.



On the website, users can find a large number of publications, webinars and country-specific information on inclusion of people with disabilities.

Contact: [www.businessanddisability.org](http://www.businessanddisability.org)

### **Inklusion gelingt ('Inclusion works')**

Information portal of the Confederation of German Employers' Associations (BDA), the Association of German Chambers of Industry and Commerce (DIHK) and the German Confederation of Skilled Crafts (ZDH) on the topic of inclusion of people with disabilities.

Contact: [www.inklusion-gelingt.de](http://www.inklusion-gelingt.de) (German only)

### **Integration Office**

This website provides an overview of the locations of the Amt für die Sicherung der Integration schwerbehinderter Menschen im Arbeitsleben (Integration Office, literally 'Office for the integration of persons with disabilities into working life'), organised by federal state.

Contact: [www.bih.de/integrationsaemter/medien-und-publikationen/fachlexikon-a-z/integrationsamt/](http://www.bih.de/integrationsaemter/medien-und-publikationen/fachlexikon-a-z/integrationsamt/) (German only)

### **International Association of Natural Textiles (IVN e.V.)**

The International Association of Natural Textiles (IVN) comprises more than 100 companies from all areas of the leather and textile industry. The IVN promotes networking and advises companies on implementing inclusion projects in global textile supply chains. The IVN itself operates as a standard-setting organisation and offers sustainability certification with **NATURTEXTIL IVN zertifiziert BEST** (IVN BEST).

Contact: [www.naturtextil.de](http://www.naturtextil.de)

### **International Disability Alliance**

The International Disability Alliance (IDA) comprises 14 global and regional disabled people's organisations (DPOs).

Contact: [www.internationaldisabilityalliance.org](http://www.internationaldisabilityalliance.org)

### **Partnership for Sustainable Textiles**

The objective of the Partnership for Sustainable Textiles (Textile Partnership) is to improve social and environmental conditions in textile supply chains. It is the first port of call for all companies that wish to step up to their responsibility for the environment and human rights along the entire supply chain. As a multi-stakeholder initiative, the

Textile Partnership brings all involved parties together and offers them a network and relevant support. The Partnership had some 140 members as of early 2021, including companies, industry associations, trade unions, civil-society stakeholders, standards organisations and the German Government.

Contact: [www.textilbuendnis.com/en](http://www.textilbuendnis.com/en)

### **Sozialheld:innen (Social Heroes)**

An association of persons with and without disabilities that has tasked itself with raising awareness of the topics of disability, accessibility and inclusion among individuals, institutions and companies.

Contact: [www.sozialhelden.de/en/social-heroes](http://www.sozialhelden.de/en/social-heroes)

### **Specialist integration services**

This website provides an overview of German specialist integration services, for each federal state.

Contact: [www.bih.de/integrationsaemter/medien-und-publikationen/linksammlungen/](http://www.bih.de/integrationsaemter/medien-und-publikationen/linksammlungen/) (German only)

### **UnternehmensForum**

The UnternehmensForum is a Germany-wide and cross-sectoral coalition of corporate groups and medium-sized businesses that are keen to enable individuals with a disability or reduced ability to participate fully in working life. To this end, the network elaborates measures and recommendations for personnel recruitment and training for persons with disabilities.

Contact: [www.unternehmensforum.org](http://www.unternehmensforum.org)

# ANNEX 2: Accessibility checklist

The accessibility checklist covers the following areas:

1. Principles of accessible design
2. Outdoor and indoor circulation routes
3. Doors and gates
4. Steps and stairways
5. Rooms
6. Sanitary facilities
7. Control panels
8. Work resources
9. Software and websites
10. Information and communication
11. Escape routes and emergency access

Companies can check out their own accessibility, starting with any one of these areas. It is not necessary to work thorough areas 1 to 11 in order. The goal should be to tackle as many areas as possible.

One approach to examining accessibility within the company can be to establish an assessment team. This team should consist of one representative from senior management, one from the HR department and one from the employees' association, and one employee with disabilities or one representative from a disabled people's organisation.

## 1. Principles of accessible design

				Comments
Is it clear which group of people uses or will use a specific building, rooms, work resources, alarm systems, etc.?				
Have the impairments (e. g. strength, mobility, hearing, vision) and needs (e. g. plenty of space, support) of this group of individuals been identified?				
Are these impairments and needs taken into account, for instance, in building plans and when purchasing work equipment?				
Is key information (e. g. warning signals) communicated for at least two of the three senses of hearing, vision and touch?				
Are there alternative options for the use of buildings and operation of work equipment that would compensate for the existing impairments (e. g. ramps as an alternative to steps)?				

## 2. Outdoor and indoor circulation routes

				Comments
Are circulation routes at least 150 cm wide?				
Are circulation routes sufficiently high (generally at least 220 cm headroom)?				
Are circulation routes free of raised thresholds, steps and uneven surfaces?				
Are there alternatives to steps, e. g. lifts or ramps?				
Are floor coverings level and anti-slip?				
Are any inclines on routes as small as possible (in longitudinal and transverse direction)?				
Are lifts at least 100 cm wide and 140 cm deep?				
Are circulation routes easy to navigate, e. g. due to the use of signage or tactile floor coverings (floor markings)?				
Are routes sufficiently well illuminated?				

### 3. Doors and gates

				Comments
Are the doors easily recognisable, e. g. by employing dark frames on light walls?				
Is there sufficient room for manoeuvre in front of and behind manually-operated doors?				
Are the door handles, knobs and buttons easily identifiable, e. g. thanks to a visually contrasting design?				
Are door latches, handles and buttons easily accessible (typically placed at a height of 85 cm)?				
Do latches have an ergonomic design, e. g. crescent- or U-shaped knobs?				
Can doors be opened with minimal exertion?				
Are there automated doors, e. g. for people carrying loads with both hands or for individuals using walking aids?				
Are the doors and lift doors at least 90 cm wide?				
Are the doors sufficiently high (at least 205 cm)?				
Are transparent doors and walls clearly recognisable?				

### 4. Steps and stairways

				Comments
Do steps and stairways have clear visual cues, and are they easy to use, e. g. straight from top to bottom?				
Are stairways sufficiently wide (at least 120 cm)?				
Have measures been taken to help users feel safe on steps and stairways, e. g. through the use of opaque materials?				
Do all steps on a staircase have the same anti-slip coverings and are these sufficiently effective?				
Are safety, convenience and step-dimension rules observed for steps and staircases?				
Is an intermediate landing located after no more than 12 steps?				

Is a safe hold ensured by the placement of a handrail at a height of 85 cm to 90 cm on both sides of the staircase?				
Does the staircase have risers (see Figure 9)?				
Is the pitch the same for all steps in a staircase (ideally 17 cm for the riser and 29 cm for the tread width; see Figure 9)?				
Do handrails extend at least 30 cm beyond the first and last steps?				
Are handrails non-slip and easy to grasp?				
Is each of the steps easy to recognise, e. g. thanks to marking of its front edge?				
Are protruding overhangs on steps eliminated (see Figure 9) to avoid feet getting caught?				

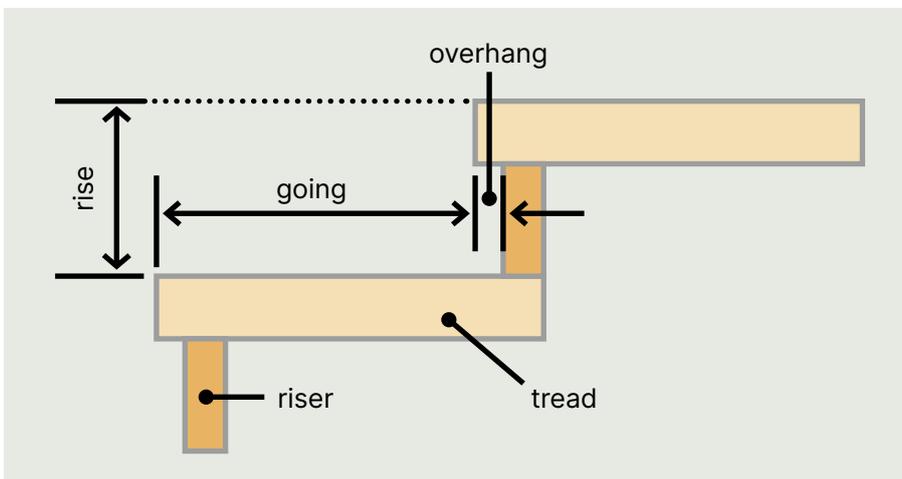


Figure 9:  
Treads and risers

## 5. Rooms

	☹️	😊	☺️	Comments
Do the rooms offer sufficient clear floorspace, e. g. at least 150 × 150 cm of clear space in front of doors?				
Are the circulation spaces within the rooms at least 90 cm wide?				
Is there sufficient room for manoeuvre behind desks, e. g. 120 cm with full wheelchair clearance?				
When work resources are allocated, are measures taken to ensure that they are accessible to all users, taking particular account of individual reaches and heights?				

Are the rooms sufficiently illuminated for all expected users and can the lighting be individually configured, e. g. using dimmers?				
Is glare prevented, e. g. by suitably arranging furniture and other work equipment?				
Are the room acoustics (e. g. reverberation time, echo) adapted to the requirements of individuals with auditory impairments?				

## 6. Sanitary facilities

				Comments
Is there a sufficient number of accessible toilet cubicles?				
Can cubicles be unlocked from the outside in an emergency?				
Does the cubicle door open outwards (in the event that help has to be provided)?				
Does the cubicle provide a means of alerting other persons in the event of a problem, e. g. an emergency call system close to the toilet bowl?				
Can the emergency call system be triggered by an individual sitting on the toilet bowl or lying on the floor?				
Is it also easy for blind and visually-impaired individuals to operate the emergency call system?				
Are the controls of the sanitary facilities (e. g. toilet flush, soap dispenser) and the materials (e. g. toilet paper) accessible and usable, even without changing sitting position?				
Are folding support handles located on both sides of the toilet bowl?				
Is there a shower toilet whose shower function can be operated remotely?				

## 7. Control panels

				Comments
Are the controls easy for everyone to recognise, e. g. designed to contrast with the surroundings?				
Are the controls accessible to everyone, e. g. positioned at the right height for individuals whether standing or sitting?				
Can the controls be used by everyone, e. g. requiring minimum exertion to use?				
Is it easy for everyone to recognise when the controls have been activated, e. g. through acoustic or visual feedback?				
Are there mechanisms to prevent the controls being activated by mistake?				
Can the function of the controls be identified with at least two senses, e. g. thanks to tactile pictograms on switches or buttons?				

## 8. Work resources

				Comments
Are the work equipment and the corresponding work area identifiable and operable by all potential users, e. g. through contrasting markings and tactile control design?				
Do the technical workflows for the work equipment meet the expectations of the potential users?				
Are key elements of the work equipment (e.g. controls, production inputs) accessible to all potential users, e. g. through moveable control panels?				
Is the work equipment usable by all potential users, e. g. thanks to being readily reconfigurable to incorporate necessary individual user elements, such as special handles and knobs or interfaces with information and communications technology (ICT) products?				
Do the work resources have a sufficient fault tolerance to allow work tasks to be completed without risk?				

## 9. Software and websites

				Comments
Can the content presented be discerned by all users, e. g. through a sufficient contrast ratio between the text and background (at least 4.5:1, though ideally 7:1 – see <a href="#">Technique G17 of the Web Content Accessibility Guidelines</a> )?				
Has the two-sense principle been applied to ensure that key content can be identified, e. g. through the use of alternative texts for key images or subtitling for videos?				
Is the two-channel principle applied to ensure that software and websites are easy to use in full, e. g. through keyboard and voice-command options?				
Is usability guaranteed for all users, e. g. by giving individuals with reduced motor ability generous processing times for input screens?				
Can all key content and structures be understood by all users, e. g. through the use of simple / easy language?				
Can all users anticipate how software and websites will be structured and how to use them, e. g. through consistent arrangement of navigation elements?				
Is the content compatible with users' input and output aids (e. g. Braille display, screen reader, head mouse)?				

## 10. Information and communication

				Comments
Are control and signage systems easy for everyone to comprehend, e. g. through visually contrasting and tactile signs on or close to staircase handrails?				
Can everyone discern the information aimed at them, e. g. through high-contrast markings or pictograms?				
Are information and communication installations (e. g. information boards, PCs, telephones) accessible to all potential users, including individuals with limited reach?				
Can communication systems be used by everyone, e. g. by means of customisation options, such as voice command on a PC?				

## 11. Escape routes and emergency access

				Comments
Is the alarm trigger identifiable to everyone, e. g. as a high-contrast manual call point?				
Can the alarm be activated by everyone, e. g. thanks to manual call points that can also be accessed from a sitting position?				
Is it certain that everyone will be alerted in an emergency, especially individuals with sensory impairments (e. g. deaf persons)?				
Is the escape route strategy comprehensible for everyone, e. g. by means of tactile escape route marking at reaching height?				
Is it certain that everyone can escape/be rescued safely, especially individuals with limited mobility (e. g. wheelchair users)?				
Are the building characteristics suitable for rescue operations, e. g. are steps at least 120 cm wide, or are there any firefighter's lifts?				

Source: Verwaltungs-Berufsgenossenschaft (VBG), statutory accident insurance provider, [Barrierefreie Gestaltung von Arbeitsplätzen: Checkliste für die Praxis im Unternehmen](#) ('Accessible workplace design: Checklist for practical implementation at the company' (German only))

## ANNEX 3: Glossary

### **Compensatory levy**

Disabled persons must make up at least 5 per cent of the workforce at private and public-sector companies that employ at least 20 people. Companies that do not employ the prescribed number of persons with disabilities must pay a compensatory levy for each designated position they fail to fill with a disabled individual. This levy is designed to motivate employers to take on disabled employees. The compensatory levy is earmarked exclusively for promoting the inclusion of persons with disabilities into working life.

### **Due diligence**

In order to identify, prevent, mitigate and account for how they address their adverse impacts, business enterprises should carry out human rights [see glossary] due diligence [and in regard to certain environmental standards]. This process should include assessing actual and potential human rights impacts, indicating and acting upon the findings, tracking responses, and communicating how the impacts are addressed.

(Guiding Principle 17 of the United Nations Guiding Principles on Business and Human Rights; see also glossary entry for 'Supply chain')

### **Human rights**

The German Government's NAP monitoring (see glossary) defines human rights as basic international standards designed to guarantee dignity and equality for all people (see also: Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR)).

Human rights are inherent to all human beings, regardless of nationality, place of residence, gender, national or ethnic origin, skin colour, religion, mother tongue or any other characteristic. When it comes to the human rights of employees in particular, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work sets out four basic principles in this regard: freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

<b>Human rights risk / negative human rights impact</b>	According to NAP monitoring (see glossary), human rights risks and the potentially negative human rights impact of a company refer to all risks of the company's business activities having one or more negative impacts on human rights. A negative human rights impact arises if a company's actions contribute directly or indirectly to hindering or impairing an individual's ability to exercise his or her human rights. Companies can impair the human rights of such persons as employees, loan workers and individuals purchasing or consuming their products and services, as well as those of individuals at the company's facilities and employees of suppliers and sub-suppliers. There is a risk in this context that the company's actions will, either directly or indirectly, negatively impact practically the whole range of internationally recognised human rights.
<b>Integration Office</b>	The Integration Office (Amt für die Sicherung der Integration schwerbehinderter Menschen im Arbeitsleben - Integrationsamt) is a German authority that carries out tasks in accordance with the German laws relating to persons with disabilities. In Bavaria and North-Rhine/Westphalia it is known as the Inclusion Office (Inklusionsamt).
<b>NAP monitoring</b>	The German Government adopted the National Action Plan for Business and Human Rights (NAP) in 2016. In this plan, the German Government mainstreamed the human rights due diligence (see glossary) requirements of German companies. Between 2018 and 2020, as part of its NAP monitoring the German Government examined the extent to which companies were meeting their due diligence obligations.
<b>Risk analysis</b>	According to NAP monitoring (see glossary), the risk analysis describes one or more processes for identifying and evaluating potential adverse impacts on human rights (human rights risk, see glossary) in the company's value chain (see glossary). The type and depth of the risk analysis may vary from one company area to another and in relation to different stages along the value chain. The risk analysis also serves to identify areas in the value chain where the risk of detrimental human rights impacts is most significant. According to the Textile Partnership it is also necessary to incorporate environmental and corruption risks.

<b>Severe disability</b>	Book IX, Part 1 of the German Social Code defines persons with disabilities as persons who exhibit physical or mental disabilities or sensory impairments which differ from what is typical for their age, and who, in conjunction with attitudinal and environmental barriers, are prevented from participating equally in society for more than six months. Persons with disabilities are considered to be severely disabled if they have a degree of disability of 50 per cent or more. Under certain circumstances individuals with a degree of disability between 30 and 50 per cent may be treated in the same way as persons with severe disabilities.
<b>Specialist integration service</b>	Specialist integration services are services provided by third parties involved in implementing measures for the inclusion of disabled and severely disabled persons into working life.
<b>Supply chain</b>	According to the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), a company's supply chain includes all steps in Germany and abroad that are required to manufacture products and deliver services, from raw material extraction to the delivery of goods to consumers. This includes the company's own business area and the activities of direct and indirect supplier firms.
<b>Value chain</b>	According to NAP monitoring see (glossary), a company's value chain includes all activities relating to its product or service through which the inputs are transformed into outputs in the value creation process. This means that the value chain comprises not only a company's own business activities, but also other firms with which the company has a direct business relationship, firms in the upstream supply chain (see glossary) as far back as the procurement of raw materials, the customer base, project partners and, if relevant, downstream disposal activities. The value creation process also includes supporting functions such as investment and financing activities.





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