Eswatini
OPD/DCSO Capacity Assessment Report

Commissioned by

UNICEF (Eswatini)

Developed by

The Africa Disability Alliance (ADA)

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CONTENTS

1. Introduction

The Organisational Mapping (OM) exercise was meant to help the staff and Board of organisations reflect on their strengths and identify areas for capacity strengthening by building consensus. The exercise allowed OPDs and DCSOs to consider themselves as a whole, asking what works well and what could be improved. OM helped organisations to collectively identify priority areas for improvement and steps for addressing them. OM was not meant to be a strategic planning tool but to help organisations generate institutional capacity-building plans. The mapping and capacity self-assessment exercise results informed the training of OPDs and DCSOs on corporate governance and operations management.

2. Participating Organisations

A total of twenty three (23) national and local OPDs and DCSOs completed capacity self-assessments-

- Another Hope Foundation (AHF)
- Association of Persons with Albinism Eswatini (APAESWA)
- Autism Swaziland – Litsemba lemliba (AS)
- Association of Sports of the Deaf (ASD)
- Disabled Women of Swaziland (DIWOSWA)
- Down Syndrome Eswatini (DSE)
- Eswatini Comprehensive Disability Mainstreaming Initiative (ECDMI)
- Eswatini Epilepsy Organisation (EEO)
- Eswatini Hospice at Home (EHH)
- Eswatini Association of Visually Impaired Persons (ESAVIP)
- Federation of the Organisations of Disabled in Swaziland (FODSWA)
- Likhono Lingumnotfo Ntontozi Inkhundla Vocational Centre (LLNIVC)
- Lobamba Cross Disability Organisation (LCDO)
- Association for Persons with Mental and Severe Disabilities Eswatini (MSDE)
- National Association of the Deaf Eswatini (NADE)
- National Association of Persons with Visual Impairment in Eswatini (NAPVIE)
- Network of Businesswomen with Disabilities (NBWD)
- Parents of Children with Disabilities in Swaziland (PCDSWA)
- Parents of Deaf Children Association (PDCA)
- SANAKWA
- Swaziland Association of the Physically Disabled Persons (SNAPD)
- Sicalo Semphilo Mkhiweni Disability Organisation (SSMDO)
- Swaziland Network Campaign for Education for All (SWANCEFA)

Cheshire Homes of Swaziland declined participation.

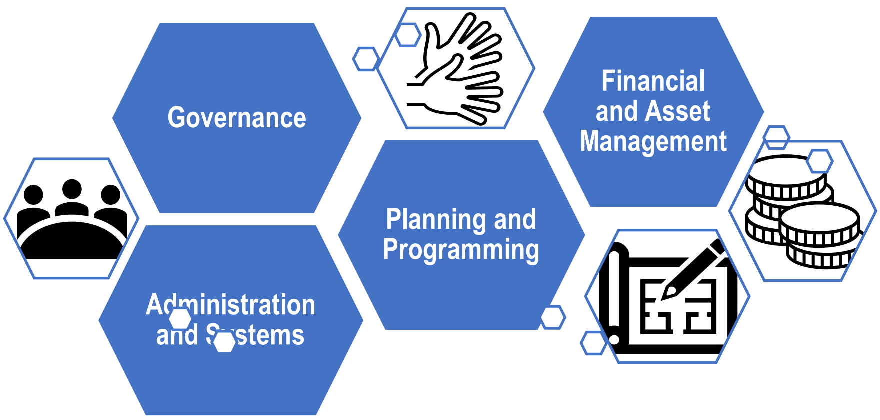
Fifteen (15) fieldworkers nominated by OPDs and DCSOs were trained and contracted to support 23 OPDs/DCSOs to complete the Capacity Self-Assessment Forms –

- Male: 06
- Female: 09
- Disability: 10 fieldworkers disclosed disability (1 Deaf, 2 albinism, 3 blind, 3 physical), and 2 were parents

They earned a combined total of E23,000 (approx. USD 1198). An additional E 21,125 (USD1100) was paid towards travel, food and personal assistant allowances for the fieldworkers and Board members who attended the training and one-day capacity assessment sessions.

3. Organisational Capacity Self-Assessment Tools

The following domains were assessed:



Two capacity self-assessment tools were used:

Capacity Assessment Form (CAF)	**SHIA Octagon Capacity Assessment and Organisational Analysis (CAOA)**
Financial Policies and Procedures;	Mission and Vision
Cash and Banking	Programming
Accounting and Record Keeping	Learning and Evaluation
Governance and Leadership	Advocacy
Administration and Logistics	Field Engagement
Operations Management	Network Leadership
Structure: Roles and Responsibilities	External Communications
Staffing and Human Resources Management	Governance
Partnerships and Networking	Financial Management
Adequacy of Physical Infrastructure	Fundraising and Donor Relations
Stock, Inventory and Fixed Asset Management and	Administration
Management Information Systems (MIS)	Human Resources
	Advocacy

4. General Observations

Morale amongst the majority of OPD leadership appears to be low. Leaders express themselves as feeling stuck, not moving forward, not seeing an impact, and working alone.

Leaders reflect that 90% of their time spent on organisational work constitutes attending meetings to which they have been invited but do not necessarily feel they contribute value in contribution or expertise.

The paralysis caused by the mindset of '*no money, therefore no staff or office space*' has also stopped most organisations (and OPDs in particular) from developing any programmes that give effect to the purpose they were established for in the first place.

The lack of concrete programming has led to demoralised leadership in most organisations (and OPDs in particular) at the cost of good governance practices. Furthermore, many organisations list several services/programmes but do not necessarily have any structured programmes with expertise, tools, and trained volunteers/staff who offer these programmes/services. This might impact their registration as voluntary organisations rendering services to persons with disabilities negatively.

The analysis of the self-assessments reveals that most OPDs do not employ any staff but use their leadership as volunteers. However, none of the OPDs and DCSOs regard volunteers as human resources and therefore do not keep track of or account of time or personal funds spent for travel etc., that these leaders make as 'own contribution' to running their organisations. Therefore, they have also not put bookkeeping or other administrative systems in place.
Furthermore, several member organisations do not maintain membership registers, potentially impacting their status as representative organisations. While claiming to represent their constituencies, most organisations have communication systems in place that embeds accountability to their membership.

Several organisations also listed that they cater to almost all impairment groups. Still, engagement with many of these indicated a lack of knowledge and expertise in designing programmes from a universal design perspective, including providing reasonable accommodation support measures to maximize meaningful participation.

Organisational leaders struggle with 'branding' and use multiple names and/or abbreviations. This partly emanates from the change of the country's name from Swaziland to the Kingdom of Eswatini.

5. Governance Self-Assessment

a. Executive Summary

Indicators

- Board Status and Functioning
- Network Leadership and Partnerships
- External Communications

Main observations across organisations

Most organisations report serious weaknesses in their governance processes. These range from Board composition (lack of diversity and expertise), Board policies (either none or very limited policies in place, and little implementation of policies that do exist), and Board capacity to execute portfolio responsibilities (only four organisations rated this as excellent). Organisations fare better in convening Board and Annual General meetings as per constitutional prescripts, but express that these meetings are not always well planned.

OPDs, which in the main do not employ any staff, do not have any financial resources, and therefore rely on their Board members to execute activities, report the highest level of non-compliance, partly due to feeling overwhelmed with the work that has to be done with no resources. They note that most of their time as Board members is spent attending internal and stakeholder meetings, with little activity beyond these. DCSOs, which tend to have staff performing programmatic work, note that their Board members, in the main, limit their involvement to quarterly Board meetings, and that oversight responsibilities are often weak.

Organisations generally fare better in the networking space, and this appears to take up much of their time and effort. Importantly, most of the networking effort is not self-initiated and lack strategy. Formal partnerships are rare, and organisations express frustration at being donor-driven, often to insignificant sustainability and self-reliance after partnerships conclude.

Importantly, although all organisations place human and disability rights high on their respective agenda, 40% of the participating organisations indicate that they rarely engage in external outreach, have no strategy in place, have not identified target audiences or distinct messages, and 26% of participating organisations report that they have no tools to communicate messages to target audiences, even though they all have personal smartphones and personal social media accounts.

Best performing organisations

FODSWA, MSDE, NAPVIE, EEO, LCDOD and SWANCEFA rate themselves as either fully capacitated or well on the road to governing their organisations responsibly. FODSWA and SWANCEFA reports that they do well on the networking front. The MSDE, Autism Swaziland, AHF and SWANCEFA are overall the best performing organisations in the external communication space.

b. Governance (CAOA Tool)

- **Board of Directors Composition**

  6 organisations (SNAPD, ASD, DIWOSWA, DSE, LLNI, LCDOD) indicated that Board members are drawn from a limited number of fields, only a few have relevant experience, and there is very minimal representation of historically excluded groups.

  Only 2 organisations (MSDE, FHH) indicated that Board members are drawn from a wide variety of appropriate fields; historically excluded groups are well represented; members have extensive experience and practical expertise.

- **Board Policies**

  9 organisations (APAESWA, DIWOSWA, DSE, SNAPD, PCDSWA, NAPVIE, ASD, LLNI, LCDOD) reported that they either have no board policies or they do have some, but these are not followed for such issues as, for example, term limits, conflict of interest, and board orientation., ,

  7 organisations (AHF, AS, ECDMI, ESAVIP,, EHH, FODSWA, SWANCEFA) have Board policies that are followed around such issues as, for example, term limits, conflict of interest, and board orientation.

  2 organisations (MSDE, EEO) indicate that Board policies for such issues as term limits, conflict of interest, and board orientation represent best practice and are closely followed.

- **Board Meetings**

  2 organisations (DIWOSWA, SNAPD) reported that Board meetings are infrequent, sparsely attended, not well documented, and/or result in nontransparent decision-making; tensions often arise.

4 organisations (ASD, EHH, LLNI, LCDOD) noted that whilst Board Meetings occur regularly they are not always well attended or documented; they often to lead to non-transparent decisions; tensions occur infrequently.

7 organisations (AHF, MSDE, AS, ECDMI, EEO, SWANCEFA, NAPVIE) indicated that regular meetings are well planned, attended and documented; they lead to transparent and strategic decisions and productive relationships.

- **Responsibilities**

5 organisations (DIWOSWA, DSE, NBWD, SNAPD, ASD) indicated that Board members are not always clear of their roles and responsibilities, their contributions to the organization are limited and they provide limited guidance and input.

Only 4 organisations (AHF, MSDE, AS, SWANCEFA) reported that Board members are clear on their roles and provide welcome direction on vision and strategy, and actively fulfill other useful roles.

- **Annual General Meeting (if applicable)**

APAESWA indicated that its AGM convenes rarely; strategies are not reviewed; financials are not disclosed; members do not fulfill their roles; voting process is not followed; membership guidelines are unclear.

ASD reported that their AGM convenes every few years; strategy is discussed but consensus not reached; financials are not fully presented; voting process is not always followed; membership guidelines provide only partial guidance on roles and responsibilities.

8 organisations (AHF, ECDMI, EHH, FODSWA, LLNI, LCDOD, SNAPD, PCDSWA) indicated that their AGMs convenes once a year, although planning could be stronger; strategic decision- making occurs but discussions are often sidetracked; full financial information is presented but could be made more accessible; voting process is followed most of the time; occasional confusion on member roles and responsibilities.

4 organisations (MSDE, ESAVIP, SWANCEFA, NAPVIE) noted that their AGMs convenes at least once a year and is planned well in advance; members demonstrate leadership in strategic decision-making; financials are presented transparently and accessibly; voting and other procedures are consistently implemented; member roles and responsibilities are very clear.

c. **Governance & Leadership** (CAS Tool)

• 4 organisations are not legally registered	17%	PDCA, SSMDO, SNAPD, ESAVIP
• 10 organisations reported that their boards and senior management do not have any/complete set of written roles and responsibilities	43%	AS, DSE, DIWOSWA, NBWD, NADE, PDCA, SNAPD, LLNI, ASD, PCDSWA
• 9 organisations fall short of operating according to the approved by-laws/policies.	39%	DSE, NBWD, AHF, APASWA, DIWOSWA, NADE, PDCA, SNAPD, ASD
• 11 organisations reported some challenges in ensuring that their boards and senior management meet regularly	48%	NBWD, AHF, DSE, APASWA, NADE, PDCA, SNAPD, LLNI, ASD, LCDOD, PCDSWA
• 6 organisations reported that they do not have any management communication structures information-sharing practices in place Another 6 say they fall short	52%	DSE, NBWD, PDCA ECDMI, SNAPD, LLNI, FODSWA, ASD, ESAVIP
• 11 organisations report no or very limited problem-solving and dispute management mechanisms being in place.	39%	DIWOSWA, DSE, ECDMI, EHH,, NBWD, PDCA, SNAPD, APASWA,, ASD, ESAVIP, NADE

d. **Partnering and Networking** (CAS Tool)

- 10 organisations (ASD, DIWOSWA, DSE, NBWD, PDCA, SNAPD APAESWA, ESAVIP, ECDMI, LLNI) noted that they do not, or hardly ever, update & maintain a service delivery map.,
- Only 5 organisations (ASD, DSE, NBWD, NADE, SNAPD) do not attend coordination/network meetings.regularly
- 5 organisations (NBWD, SSMDO, SNAPD ASD, NADE) have no or little referral practices in place.
- Only 4 organisations (ASD, NBWD NADE, SNAPD) reported no or few networks and partnership practices to facilitate experience and information sharing among partners on disability issues

e. **Network Leadership** (CAOA Tool)

(This section was to be completed only by networks or coalitions)

- **Network Strategy**

  FODSWA, as the national umbrella OPD, reported that the network has a partially articulated strategy but largely relies on the strategies of its members, making it difficult at times to distinguish the network from its members.

  SWANCEFA, the Swaziland Network Campaign for Education for All, indicated that the network has a compelling and articulated strategy that is distinctive but complementary with those of its members.

- **Consistency**

  FODSWA reported that the network is consistently active on its issues but could be more effective in its communications with members and external audiences.

  SWANCEFA indicated that that the network is highly effective and is consistently and proactively engaged with members and external audiences.

- **Managing Conflict**

  FODSWA reported that conflicts or disagreements arise frequently among members and often prevent effective collaboration or resource sharing; the network's attempts to manage tensions are often unsuccessful.

  SWANCEFA indicated that conflicts among members are rare and, when they occur, are resolved constructively by the network in a manner that allows effective collaboration.

f. External Communications (CAOA Tool)

- **Communications**

  9 organisations (DSE, PDCA APAESWA, DIWOSWA, ECDMI, FODSWA, LCDOD, SNAPD, NAPVIE) reported that they rarely engage in external outreach and no strategy for doing so; key target audiences have not been identified, or that formal communications strategy exists but organization does occasional general outreach when opportunities arise.

  3 organisations (MSDE, AS, SWANCEFA) indicated that they have a clearly outlined strategy for communications with targeted and distinct messages to prioritized audiences that are regularly revised in light of changing contexts.

- **Goal and Alignment**

  2 organisations (DSF, PDCA) reported that key messages at times do not support and even undermine organisational goals, with 2 organisations (APAESWA, DIWOSWA) indicating that whilst key messages generally support organisational goals they occasionally do not align with those goals.

  3 organisations (MSDE, ECDMI, SWANCEFA) rated their messages as consistently highly effective at furthering organisational goals.

- **Dissemination**

  3 organisations (DSE, PDCA, ESAVIP) reported that they do not disseminate information to key audiences.

  11 organisations (AHF, APAESWA, ASD, AS, DIWOSWA, ECDMI, EEO, EHH, LLNI, FODSWA, PCDSWA) indicated they broadly disseminate information to target audiences, but could make such messages more timely, tailored, and specific.

  3 organisations (MSDE, SWANCEFA, NAPVIE) noted that they broadly disseminate information in a timely manner in easily accessible forms, and it presents clear and specific messages to key audiences.,

- **Communications**

  6 organisations (DIWOSWA, DSE, PDCA, LCDOD, SNAPD, NAPVIE) believe they have no tools to communicate messages to target audiences, with FODSWA noting that it uses basic but outdated tools for outreach which is not always effective for reaching target audiences.,

  3 organisations (AHF, MSDE, SWANCEFA) reported that their tools are well designed, easily accessible, and used optimally to reach target audiences.

6. Administration and Systems Self-Assessment

a. Executive Summary

Indicators

- Administration
- Human Resources
- Management Information System
- Safety and Security

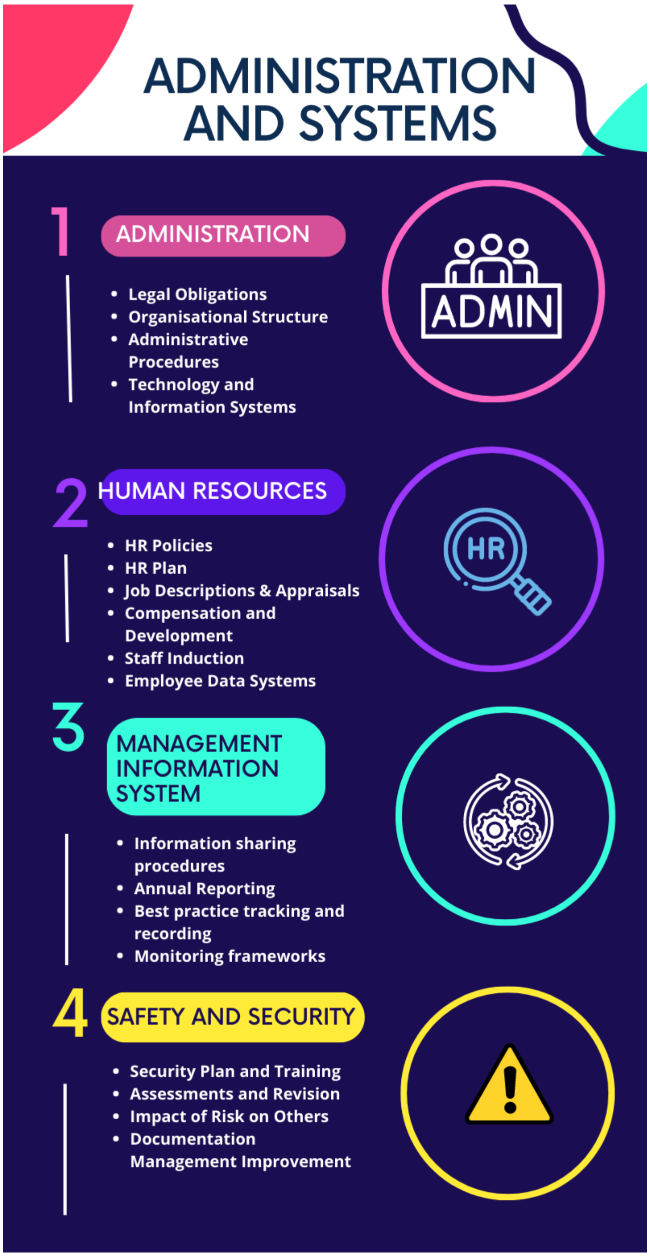
Main observations across organisations

Four organisations reported that they are currently not legally registered as legal entities. Several registered organisations are struggling with full compliance with the relevant laws.

78% of participating organisations reported tat they either do not employ any staff, or have substantial vacancies due to lack of funding. Most organisations make extensive use of volunteers, but have no policies or systems in place to manage the process.

43% of participating organisations indicated that they have either no or a very rudimentary organisational structure in place.

49% of participating organisations reported severe weaknesses in operating procedures and protocols



Best performing organisations

MSDE, SWANCEFA, Eswatini Hospice at Home and Autism Swaziland reported satisfaction that their administration and systems engender accountability, their HR planning and policies and job descriptions and appraisal systems. The first two also feel they offer good practice in safety and security management.

Only MSDE indicated that they believe they offer competitive salaries and benefits.

b. **Administration** (CAOA Tool)

- **Legal Obligations**

  ESAVIP and SNAPD are not not legally registered and are unfamiliar with relevant laws.

  The AHF is in the process of attaining legal status and/or is not in full compliance with relevant laws.

  DIWOSWA, DSE and NBWD are legally registered but struggles at times to be fully compliant with relevant laws.

  The remaining organisations report that they are legally registered and fully compliant with relevant laws.

- **Organisational Structure**

  AS, DSE, ESAVIP, FODSWA and NBWD have no formal organisational structure or clear division of roles and responsibilities.

  AHF, DIWOSWA, LLNI, SNAPD and PCDSWA have a basic organisational structure in place with some divisions in roles and responsibilities.

  The remaining organisations report well-designed structures in place for most work, ranging from there is still some lack of clarity in responsibilities and roles to highly compatible with the goals of the organization, allowing for maximal effectiveness and clear roles and responsibilities for each position.

- **Administrative Procedures**

  11 organisations (APAESWA, DIWOSWA, DSE, ESAVIP, NBWD, SNAPD, ECDMI, EEO, FODSWA, LLNI, LCDOD) have either no documented administrative procedures or partially documented administrative procedures explain key office functions. Still, they are not consistently applied or known to staff.

  3 organisations (MSDE, EHH, SWANCEFA) report that administrative procedures are clearly documented, followed , regularly reviewed, and updated throughout the organization.

- **Technology and Information Systems**

  10 organisations (APAESWA, AS, DIWOSWA, ESAVIP, ESAVIP, LLNI, NBWD, LCDOD, SNAPD, NAPVIE) acknowledge that their technology and information systems do not meet basic needs of their organisations.

  2 organisations (MSDE, SWANCEFA) take pride in technology and information systems allowing the organization to function optimally, with regularly reviewed and updated systems.

c. **Human Resources** (CAOA Tool)

74% of organisations report that they do not employ any contract or permanent staff, but rely on volunteers and Board members.

- **Human Resources Policies**

  12 organisations (APAESWA, ASD, DIWOSWA, DSE, ESAVIP, EEO, NBWD, SNAPD, PCDSWA, NAPVIE, LLNI, LCDOD) either have no formal human resources policies in place, or their incomplete policies are outdated and not consistently applied.

  3 organisations (MSDE, EHH, SWANCEFA) believe they offer good practice with clear and frequently updated policies on vital human resources issues that are consistently applied, and staff are familiar with relevant pieces

- **Human Resources Plan**

  15 organisations (APAESWA, ASD, DSE, DIWOSWA, ECDMI, ESAVIP, FODSWA, PCDSWA, NBWD, SNAPD, NAPVIE, LLNI, LCDOD, LLNI, LCDOD) either have no human resources plan or no staff qualified to oversee it, or simplified human resources plan but these are overseen by staff without formal training.

  3 organisations (MSDE, AS, SWANCEFA) report having well-developed and frequently revised human resources plans that reflect organisational mission and strategic plans and with formally trained, qualified staff overseeing the plans.

- **Job Descriptions and Appraisals**

  4 organisations (MSDE, AS, EHH, SWANCEFA) have accurate and updated job descriptions in place, and staff receive constructive feedback and regular appraisals and are clear on roles and responsibilities.

- **Compensation and Development**

  Only the MSDE offer salaries, benefits, and raises that are competitive with similar organisations, helping to attract and retain staff. Staff development opportunities are offered with some frequency.

d. Staffing and Human Resource Management (CAS Tool)

• 18 organisations reported that they either do not have any posts or that they have vacancies of existing posts	FODSWA APAESWA, AS, DSE, ESAVIP ECDMI, NAPVIE, NBWD, PCDSWA, PDCA, SNAPD, MSDE, LLNI DIWOSWA, EEO, EHH, NADE, SWANCEFA
• 14 organisations have no or virtually no procedures for new staff induction.	FODSWA, AHF, DSE, APAESWA, DIWOSWA, ESAVIP, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, EEO, LLNI
• 14 organisations have no personnel policies include job classification, staff development, benefits, compensation, hiring/promotion, grievances, sexual harassment, and work hours.	FODSWA, AHF, DSE APAESWA, DIWOSWA, ESAVIP, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SSMDO, SNAPD LLNI,
• 15 organisations have no or virtually no systems established for staff performance planning and review.	FODSWA, APAESWA, DIWOSWA, DSE, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA AS, SSMDO, LLNI, SNAPD
• 14 organisations do not have any confidential HR systems are in place for employee data.	FODSWA APAESWA, DIWOSWA, DSE, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SSMDO, SNAPD LLNI

e. **Management Information System** (CAS Tool)

- 4 organisations (DSE, ECDMI, NBWD, PDCA) have no defined information sharing process, and 7 organisations (APAESWA, ASD, DIWOSWA, ESAVIP, NADE, PCDSWA, SNAPD) report lacking severely in this area.
- 5 organisations (DIWOSWA, DSE, ECDMI, NBWD, PDCA) do not compile annual reports that includes program reports and financial statements, and an additional 5 organisations (APAESWA, ASD, NADE, SNAPD, LLNI) lack extensively in this area.
- 11 organisations (DSE, ECDMI, NBWD, PCDSWA, PDCA, APAESWA, ASD, DIWOSWA, NADE, SNAPD, LLNI) do not sufficiently document, report and share best practices and innovative activities with stakeholders.
- 12 organisations (APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, , NBWD, NADE, PCDSWA, FODSWA, SNAPD) do not have any, or substantially inadequate monitoring frameworks.

f. **Safety and Security** (CAOA Tool)

- **Security Plan and Training**
  3 organisations (MSDE, EHH, SWANCEFA) reported that they have security plans in place, ranging from having significant gaps and needing updating and consistent implementation to plans regularly updated and consistently followed by staff, with staff regularly being trained on risk management for personal and organisational security, including data security (MSDE).

- **Assessments and Revision**
  MSDE and SWANCEFA conduct comprehensive and relevant risk analyses for new and continuing work, including travel. Necessary data on staff are kept updated.

- **Impact of Risk on Others**
  MSDE and SWANCEFA regularly consult partners and members of the field (including volunteers, members, communities, the larger field) to ensure that the organization's work does not negatively affect other allies.

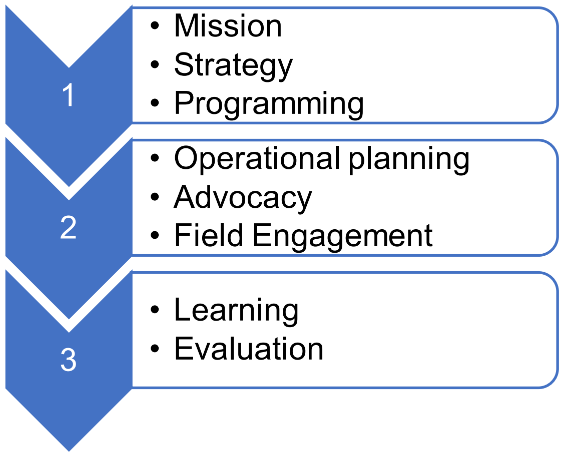
- **Documentation Improvement**
  MSDE and SWANCEFA consistently document security incidents, which lead to revisions to procedures based on lessons learned; these lessons are shared within and among organisations to establish best practices.

7. Planning and Programming Self-Assessment

a. Executive Summary

Indicators

- Mission and Strategy
- Programming
- Operational Planning
- Learning and Evaluation
- Advocacy
- Field Engagement



Main observations across organisations

Most organisations report satisfaction with their mission, vision, goals and outcomes conceptualisation, with only seven (7) organisations reporting room for improvement.

Most organisations report significant challenges with developing strategic plans and aligning programmes and operational plans to these. Almost half of organisations reported that they do not have any meaningfully workplans or annual plans, citing lack of funding as the main reason. This also impacts any meaningful evaluation.

The lack of programming impacts significantly on organisations' advocacy work, which lack strategy, accountability, consistency, continuity and impact. Only 2 organisations expressed satisfaction that their leadership/staff is well respected and regularly called upon to participate in or lead policy/accountability discussions at local, national or international levels. Most organisations reported that this weakness also extended to meaningful participation in policy development, as they believed they had no facts, proposals or data to share.

Best performing organisations

MSDE and SWANCEFA consistently come through as doing well across most indicators in this category, followed by the ECDMI and Autism Swaziland.

b. **Mission and Strategy** (CAOA Tool)

- **Mission and Vision**

  2 organisations (ASD, PDCA) have no written mission or vision and no widely shared set of values govern the work.

  4 organisations (APAESWA, DSE, NBWD, SNAPD) report that their mission and vision require review as they are written but vague; many within the organization cannot articulate them.

- **Goals and Outcomes**

  4 organisations (APAESWA, DSE, NBWD, PDCA) have no articulated goals and outcomes for organization's programmatic work,

  3 organisations (ASD, ESAVIP, SNAPD) note that although a long-term goal is stated, it is not concrete or realizable and there are no shorter term outcomes.

- **Strategic Plan**

  7 organisations (APAESWA, DIWOSWA, DSE, PDCA, ESAVIP, NBWD, SNAPD), have no written strategic plan and the work of the organization can be unfocused with little synergy among projects.

  1 organization (PCDSWA) has a written strategic plan but it does not provide a clear guide for organization's work; it is rarely referred to.

c. **Programming** (CAOA Tool)

- **Mission/Programming Alignment**

  9 organisations (AHF, APAESWA, ECDMI, DIWOSWA, DSE, NBWD, LCDOD, SNAPD, PCDSWA) noted that although most projects can be linked to mission and goals, it is difficult for the organization to define what does and does not fall within its mission; projects operate independently from one another.

- **Program Planning**

  2 organisations (NBWD, SNAPD) acknowledged that program planning rarely occurs and does not involve opportunity or needs assessments.

  6 organisations (APAESWA, ASD, DIWOSWA, DSE, LLNI, LCDOD) noted that although program planning occurs it does not involve formal opportunity or needs assessments.

- **Inclusion of Historically Excluded Voices**

  2 organisations (APAESWA, NBWD) acknowledged that voices of historically excluded groups are not reflected in program decision-making.

  4 organisations (DSE, LLNI, LCDOD, PCDSWA) noted that voices of historically excluded groups are occasionally reflected in program decision making.

d. Operational Planning (CAS Tool)

- 9 organisations (APAESWA, ASD, ESAVIP DIWOSWA, NBWD, PDCA ECDMI, NADE, SNAPD) reported that there are no or virtually no systematic procedures for involving stakeholders (including the community) in formulating organisational strategies.
- 10 (APAESWA, DIWOSWA, DSE, NBWD, PDCA, SNAPD FODSWA, ASD, NADE, PCDSWA) organisations noted that no or virtually no, annual work plan exist
- 11 organisations (APAESWA, DIWOSWA, DSE, NBWD, PDCA, SNAPD ASD, ESAVIP NADE, PCDSWA, LLNI) noted that they do not have any meaningful work plans that establish goals, activities, budgets, timeline and includes who is responsible for their execution.,
- 12 organisations (FODSWA APAESWA, DIWOSWA, DSE, NBWD, PDCA, SNAPD ASD, ECDMI NADE, PCDSWA SSMDO) reported that their management never or virtually never reviews their work plans bi-annually,
- 10 organisations (APAESWA, DSE, NBWD, PDCA, SNAPD FODSWA, ASD, DIWOSWA, NADE, PCDSWA) noted that their annual work plans do not sufficiently reflect priorities in a long-term, strategic plan.

e. Learning and Evaluation (CAOA Tool)

- **Program Evaluation**

  11 organisations (APAESWA, ASD, DSE, DIWOSWA, ECDMI, ESAVIP, NBWD, LCDOD, SNAPD, PCDSWA, NAPVIE) reported that evaluation of project performance is based on informal staff observations and is not systematically recorded.

  3 organisations (AS, EEO, LLNI) noted that Evaluation of project performance is inconsistently tracked using an overly simple or overly complicated system, primarily to meet the needs of funders.

- **Data Collection and Analysis**

  11 organisations (APAESWA,ASD, DSE, DIWOSWA, ECDMI, ESAVIP, FODSWA,, NBWD, LCDOD, SNAPD, NAPVIE) reported that no formal system for data collection and analysis on project performance exists.

  2 organisations (AS, LLNI) noted that a rudimentary but informal system exists to track project performance; the system is not regularly updated or easy to use.

- **Influence of Evaluation on Organization**

  7 organisations (APAESWA, ASD, DSE, ESAVIP, NBWD, LCDOD, NAPVIE) reported that findings around project performance do not affect organisational practice.

  7 organisations (AHF, AS, ECDMI, FODSWA, LLNI, SNAPD, PCDSWA) noted that programs are sporadically evaluated, but improvements on the basis of learnings do not happen systematically.,

f. Advocacy (CAOA Tool)

- **Advocacy Strategy**

  3 organisations (ASD, ESAVIP, NBWD) reported that influencing policymakers or holding target groups accountable is not a part of the organization’s work.

  8 organisations (APAESWA, AS, DSE, DIWOSWA, PDCA, LCDOD, PCDSWA, NAPVIE) noted that although influencing policymakers or holding target groups accountable is relevant to the organization’s work but not done in a systematic way.

- **Political Engagement**

  4 organisations (ASD, ESAVIP, NBWD, NAPVIE) reported not following developments closely.

  4 organisations (DIWOSWA, DSE, PDCA, LCDOD) noted that political developments are inconsistently followed.

  3 organisations (FODSWA, AHF, MSDE) noted that political developments are closely followed, and leadership/staff has “inside” information that allows it to respond quickly and strategically to new developments.

- **Access to Power**

  3 organisations (ASD, DIWOSWA, NBWD) reported there is no readiness, skills or contacts to participate in substantive policy/ accountability discussions.

  5 organisations (FODSWA, DSE, ESAVIP, LLNI, LCDOD) noted some readiness and skills to participate in policy/accountability discussions but that the organisations do not have the contacts to influence them (or vice versa).

  2 organisations (MSDE, AHF) reported that leadership/staff is well respected and regularly called upon to participate in or lead policy/accountability discussions at local, national, or international levels.

- **Policy Recommendations,**

  6 organisations (APAESWA, DIWOSWA, DSE, ESAVIP, NBWD, NAPVIE) reported no clear or pragmatic policy recommendations, and 4 organisations (ASD, PDCA, EEO, LLNI, LCDOD) reported they have made some recommendations but they could be clearer, more pragmatic, and more tailored to the target audience.

  2 organisations (MSDE, SWANCEFA) reported making clear and pragmatic policy recommendations consistent with organization’s mission and strategic plan are adjusted, as necessary, to political interests and a changing landscape.

- **Research**

  14 organisations (FODSWA, DIWOSWA, DSE, PDCA, ESAVIP, NBWD, AHF, APAESWA, ASD, ECDMI, LLNI, LCDOD, PCDSWA, NAPVIE) reported limited awareness of existing or relevant research, its relevance to advocacy, without any incorporation into advocacy work. Organisations do not conduct research themselves.

  2 organisations (MSDE, SWANCEFA) noted that outside research in advocacy is effectively employed and, where appropriate, organisations conduct their own research that contributes to the field, incorporating it into policy work that reflects best practices.

g. **Field Engagement** (CAOA Tool)

- **Collaboration**

  9 organisations (ASD, DIWOSWA, DSE, PDCA, LLNI, NBWD, LCDOD, SNAPD, PCDSWA) reported that they have some awareness of key players in the field but few direct collaborations with them.

  7 organisations (AHF, APAESWA, ECDMI, ESAVIP, FODSWA, SWANCEFA, NAPVIE) indicated an awareness of key players in the field and a number of productive collaborations with them, with 3 organisations (MSDE, AS, EEO) reporting extensive and productive collaborations with players in the field at local, national, regional, and/or global levels.

- **Network Participation**

  2 organisations (DSE, PDCA) have no active participation in networks, and 5 organisations (ASD, DIWOSWA, LLNI, NBWD, LCDOD) acknowledge occasional participation in networks and other coalitions.

  3 organisations (MSDE, ECDMI, SWANCEFA) indicate they are active leaders in networks and other coalitions that effectively define and push agendas.

- **Role in Movement**

  5 organisations (ASD, DSE, PDCA, EEO, NBWD) reported seeing themselves as part of a movement without actively contributing.

  9 organisations (AHF, DIWOSWA, LLNI, ESAVIP, FODSWA, LCDOD, SNAPD, PCDSWA, NAPVIE) define themselves as active within the movement but without a fully strategic approach.

  4 organisations (MSDE, AS, ECDMI, SWANCEFA) have identified their strategic role in the movement and make solid and consistent contributions to it.

- **Reputation in the Field**

  2 organisations (PDCA, EEO) reported they have a reputation for not collaborating with others, with 5 organisations indicating they have a reputation for working well with a small number of organisations but not with others.

  4 organisations (MSDE, AS, ESAVIP, SWANCEFA) noted that they believe their organisations are considered models in the field in terms of collaboration and teamwork and their reputation reflects this.

8. Financial and Asset Management Self-Assessment

a. Executive Summary

Indicators

- Financial Management
- Fundraising and Donor Relations
- Financial Policies and Accounting Procedures
- Cash and Banking
- Accounting and Record-keeping
- Administration and Logistics
- Stock, Inventory, and Fixed Assets Management
- Adequacy of Physical Infrastructure

Main observations across organisations

Most organisations use the lack of funding as the reason why they have either no funding or very limited financial systems and management tools.

None of the organisations capture own contributions from Board members (out of pocket expenses) or external donations in kind.

Only one (1) organisation indicated that their organisational priorities are sufficiently funded, partly because it employs qualified and experienced staff who are responsible for fundraising.

39% of organisations report damaged relations with past donors due to lack of and insufficient accountability for funds received.

74% of organisations report lack of meaningful procedures and protocols for cash control, banking and cashflow management.

95% of organisations report they have either no access to office space and equipment, or completely inadequate access.

Best performing organisations

MSDE and SWANCEFA rate their financial management performance as excellent across all the indicators, with the EHH and EEO performing satisfactory in all but one indicator.

b. Financial Management (CAOA Tool)

- **Financial Controls**

  10 organisations (APAESWA, ASD, DSE, DIWOSWA, ECDMI, NBWD, SNAPD, LLNI, LCDOD, PCDSWA) indicated that there are no, or very rudimentary documented financial systems or controls govern financial operations; no formal procedures for recordkeeping exist and financial reporting is non-existent or insufficiently transparent to provide adequate information for stakeholders.

  5 organisations (AS, ESAVIP, EEO, EHH, FODSWA) reported that gaps remain whilst formal systems and controls govern financial operations, including recordkeeping and transparent procedures.

  3 organisations (AHF, MSDE, SWANCEFA) take pride in robust and appropriate systems and controls that are in place governing all financial operations, including comprehensive recordkeeping and transparent procedures.

- **Budget**

  6 organisations (APAESWA, ASD, ESAVIP, DIWOSWA, NBWD, SNAPD) reported no organisational financial planning or budgeting; organization often cannot meet its financial obligations.,

  Only 3 organisations (MSDE, EHH, SWANCEFA) express satisfaction with their budgeting practice, indicating solid financial planning and budgeting, including regular budget- to-actual comparisons.

- **Financial Reporting**

  11 organisations (APAESWA, ASD, NBWD, ECDMI, DIWOSWA, SNAPD, ESAVIP, LLNI, LCDOD, PCDSWA, NAPVIE) reported that Financial reports- including a balance sheet, income statement, and a report of expenses by activity - are either not produced at all or irregularly produced, are incomplete or difficult to understand.

  4 organisations (MSDE, EEO, EHH, SWANCEFA) expressed satisfaction with their performance, noting that financial systems and planning are designed to reflect organisational priorities. Programs and finance are fully aligned in how they track money.

- **Finance/ Programs Alignment**

  6 organisations (ASD, DIWOSWA, SNAPD, NBWD, ECDMI, EEO) reported that Rudimentary budgets are created for their organisations but are not separated out by program; budget allocations and tracking are not consistent with organisational priorities.

  Only 3 organisations (MSDE, EHH, SWANCEFA) noted that their financial systems and planning are designed to reflect organisational priorities, and that programs and finance are fully aligned in how they track money.

- **Audits**

  9 organisations (APAESWA, ASD, DIWOSWA, ECDMI, FODSWA, NAPVIE, NBWD, LCDOD, SNAPD) have no documented audit procedures and audits are not conducted.,

  5 organisations (MSDE, AS, EEO, EHH, SWANCEFA) have independent annual audits and findings are addressed and disseminated to appropriate audiences.

c. Fundraising and Donor Relations (CAOA Tool)

- **Funding Diversification**

  11 organisations (APAESWA, DIWOSWA, DSE, ECDMI, ESAVIP, FODSWA, LCDOD, SNAPD, SWANCEFA, PCDSWA, NAPVIE) have one or two donors who provide short-term support. No clear strategy for raising future revenue and no attempt to find potential new institutional and/or individual donors.,

  Only MSDE reports that it has a highly developed long-term fundraising strategy that leads to sustainable and diverse support for core work, including institutional and individual donors; new sources are regularly approached.

- **Sufficient Funding**

  16 organisations (APAESWA, DIWOSWA, DSE, ECDMI, PDCA, ESAVIP, EEO, EHH, FODSWA, LLNI, NBWD, LCDOD, SNAPD, SWANCEFA, PCDSWA, NAPVIE) indicate that raised funds are insufficient to meet administrative, human resources, and programmatic needs.

  Only MSDE reports that raised funds meet needs and have some flexibility; there is sufficient cushion to allow for increased human resource investments or programmatic expansion each year.

- **Funding Organisational Priorities**

  The work of 13 organisations (APAESWA, DIWOSWA, DSE, ECDMI, EEO, ESAVIP, FODSWA, NBWD, LCDOD, SNAPD, SWANCEFA, PCDSWA, NAPVIE) are determined mostly by funder interest in specific projects, making organisational cohesion difficult.

  Only MSDE receives sufficient funder support to realize the organisational priorities outlined in its strategic plan.

- **Fundraising Staff**

  9 organisations (APAESWA, DIWOSWA, DSE, ESAVIP, EHH, FODSWA, NBWD, SNAPD, SWANCEFA, PCDSWA) have no qualified staff for fundraising and both staff and board devote little time to fundraising.

  Only MSDE has qualified and experienced staff, whose job descriptions include significant fundraising, and the Board is highly effective and successful in raising funds.

- **Donor Relations**

  9 organisations (APAESWA, DIWOSWA, ECDMI, PDCA, ESAVIP, LLNI, SNAPD, NAPVIE, LCDOD) report damaged donor relations, where communications with donors is insufficient and donors express concerns; communications with donors are not typically timely or satisfying; reporting is often late or incomplete; donors often repeatedly ask for greater clarification.

  9 organisations (FODSWA, PCDSWA, AHF, MSDE, AS, EEO, EHH, NBWD, SWANCEFA) report a positive reputation with donors, where they are known for clear and timely communication, proactive and reactive communications and reporting, but acknowledge that communications are not always as timely as donors would wish; donors occasionally have to ask for greater clarification.

d. Financial Policies and Accounting Procedures (CAS Tool)

- 17 organisations indicated that have no, or virtually no clear policy and procedure manuals for financial management exists which is readily available for all staff, if any.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD MSDE, ECDMI, EEO, LCDOD, SSMDO, LLNI

- 15 organisations have not clearly defined responsibilities for budget preparation and budget approval.
  APAESWA, DIWOSWA, DSE, ESAVIP, NAPVIE, NBWD, PCDSWA, PDCA, SNAPD ASD, ECDMI, EEO, LCDOD, NADE, LLNI

- 14 organisations do no or very limited tracking of expenditure by budget line item, and record these as they occur.
  DIWOSWA, DSE, ESAVIP, NAPVIE, NBWD, PCDSWA, PDCA, SNAPD, APAESWA, ASD, ECDMI, LCDOD, NADE, LLNI

- 15 organisations never or very rarely compared actual revenue/expenditure against budget, follow variances up and implement corrective actions in a timely manner.
  APAESWA, DIWOSWA, DSE, ESAVIP, LCDOD, NBWD, PCDSWA, PDCA, SNAPD ASD, ECDMI, EEO, NAPVIE, NADE, LLNI

- 13 organisations do not – or rarely - prepare any budgets in accordance with the strategic plan and make decisions/ priorities accordingly.
  APAESWA, DIWOSWA, DSE, ESAVIP, NBWD, PCDSWA, PDCA, SNAPD ASD, ECDMI, EEO, LCDOD, NADE
- 14 organisations do not have budgets that are integrated in the accounting system.
  DIWOSWA, DSE, ESAVIP, LCDOD, NBWD, PCDSWA, PDCA, SNAPD, APAESWA, ASD, ECDMI, LLNI NAPVIE, NADE

e. **Cash and Banking** (CAS Tool)

- 17 organisations do not have any (or any meaningful) policy and procedure manual for cash control, banking and cash flow in place for use by finance staff.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, NAPVIE, NBWD, NADE PCDSWA, PDCA, SSMDO, SNAPD, FODSWA MSDE, ECDMI, LCDOD, LLNI
- 4 organisations do not record, or bank, funds and claims received at all, with 10 organisations reporting serious failures in this area
  APAESWA, ASD, MSDE, DIWOSWA, ESAVIP, ECDMI, LCDOD, NADE, LLNI PCDSWA
- 10 organisations report no or very inadequate control, authorization and supported by full documentation of payments
  APAESWA, DSE, NBWD, PDCA, SNAPD, ASD, MSDE, DIWOSWA, LCDOD, NADE
- 13 organisations do not reconcile bank balances with bank statements, independently scrutinize and approve, and reconcile items
  APAESWA, DSE, ESAVIP, NBWD, PDCA, SNAPD, ASD, MSDE, DIWOSWA, ECDMI, LCDOD, NADE, LLNI
- 10 organisations do not have checks signed by two officials of appropriate authority after scrutiny of approved documentation
  ECDMI, EEO, NBWD, PDCA, SNAPD, APAESWA, ASD, DSE, NADE
- 15 organisations do not compile and analyze claims from advances accurately so that reimbursement is received promptly.
  APAESWA, DIWOSWA, DSE, ESAVIP, ECDMI, EEO, NBWD, PCDSWA, PDCA, SSMDO, SNAPD, NAPVIE, NADE

f. **Accounting and Record-keeping** (CAS Tool)

- 12 organisations insufficiently detail chart of accounts' structure.
  ASD, DSE DIWOSWA, ECDMI, NBWD, NADE, PCDSWA, PDCA, SNAPD, FODSWA, LCDOD, LLNI
- 8 organisations reported that no or virtually none expenditure is authorized, controlled, balanced and accounted for.
  ASD, DSE DIWOSWA, ECDMI, NBWD, NADE, PDCA, SNAPD, APAESWA, LCDOD, LLNI
- 12 organisations noted that no or virtually none expenditure is properly coded and allocated in accordance with an approved chart of accounts.
  APAESWA, ASD, DSE DIWOSWA, ECDMI, NBWD, NADE, PCDSWA, PDCA, SNAPD, LCDOD, LLNI
- 18 organisations do not extract or balance a trial balance every month.
  APAESWA, ASD, AS, DSE DIWOSWA, ESAVIP, ECDMI, NBWD, NADE, PCDSWA, PDCA SSMDO, SNAPD, FODSWA, AHF, LCDOD, NAPVIE, LLNI
- 15 organisations do not have annual financial statements issued, audited by external auditors and approved at the end of the fiscal year.
  FODSWA APAESWA, DIWOSWA, DSE, ESAVIP, ECDMI, NBWD, NADE, PCDSWA, PDCA SSMDO, SNAPD, ASD, MSDE, NAPVIE, LLNI
- 16 organisations noted that their accounting system is not computerized.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE LCDOD, NBWD, NADE, PCDSWA, PDCA SSMDO, SNAPD, AS, LLNI
- 13 organisations reported that staff are not on payroll records and salary amounts do not correspond to employees' contract as they do not have staff
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, LCDOD NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, LLNI
- 17 organisations do not use time sheets as the basis for charging salaries to different funding sources.
  APAESWA, ASD, AS, DSE, ESAVIP DIWOSWA, ECDMI, EEO, LCDOD, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, FODSWA, LLNI

g. **Administration and Logistics** (CAS Tool)

- 12 organisations reported that purchases and procurements are not made in compliance with the purchasing and procurement procedure/ manual.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PDCA, SNAPD, LLNI
- 12 organisations do not have a purchasing and procurement procedure/ manual that covers critical areas of Roles and responsibilities; Review and approval; Code of conduct, Procurement planning, and Monitoring and reporting
  ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PDCA, SNAPD, PCDSWA, LLNI
- 10 organisations do not have clearly defined levels of authority for approving different values of purchases.
  ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PDCA, SNAPD, APAESWA,
- 13 organisations do not complete a Good Receiving Note for all goods received.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, FODSWA
- 13 organisations do not periodically review and modify procedures for procurements as needed.
  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, LLNI
- 9 organisations do not have any or sufficient, systems and practices to ensure that all donor-funded purchases are acquired according to the terms specified by donor.
  DIWOSWA, DSE, ESAVIP, ECDMI, NAPVIE, NADE, PCDSWA, PDCA, SNAPD, APAESWA, ASD

h. **Stock, Inventory, and Fixed Assets Management** (CAS Tool)

- 12 organisations do not have policies and procedures for inventory of fixed assets.
  ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, EEO
- 12 organisations do not record fixed assets in a register for controlling of their status.

  APAESWA, ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD
- 13 organisations do not periodically inventory fixed assets and follow up and document on all missing items.

ASD, DSE DIWOSWA, ESAVIP, ECDMI, NAPVIE, NADE, PCDSWA, PDCA, SNAPD, AS, NBWD, LLNI

- 17 organisations do not have insurance coverage for all properties/assets.

  FODSWA, ASD, MSDE, AS, DSE DIWOSWA, ESAVIP, ECDMI, EEO, LCDOD, NAPVIE, NBWD, NADE, PCDSWA, PDCA, SNAPD, LLNI

i. **Adequacy of Physical Infrastructure** (CAS Tool)

- 6 OPDs (ESAVIP, NAPVIE, PCDSWA, PDCA, SSMDO, SNAPD) indicated they have no office space and equipment, with another 8 OPDs (FODSWA APAESWA, ASD, MSDE, DIWOSWA, DSE, ECDMI, EEO) reporting virtually none.
- 16 organisations reported that have no, or virtually no physical spaces that are appropriate for planned activities.

  APAESWA, DSE, ESAVIP, EEO, NAPVIE, PCDSWA, PDCA, SNAPD, FODSWA, AHF, ASD, MSDE, DIWOSWA, ECDMI, SWANCEFA, LLNI

- 17 organisations reported that they have no staff, or if they had staff, there would be insufficient space, lighting, supplies, and equipment to properly perform their duties.

  FODSWA APAESWA, DIWOSWA, DSE, ESAVIP, LCDOD, NAPVIE, NBWD, PCDSWA, PDCA, SNAPD, SWANCEFA, LLNI AHF, ASD, ECDMI, EEO

9. General Recommendations

The Africa Disability Alliance (ADA) wishes to make the following recommendations to strengthen the representative voice of persons with disabilities in Eswatini.

1. *Building Representative, Accountable, Credible, and Sustainable OPDs*

   A structured conversation is needed amongst OPDs regarding alignment, partnership, networking, and possibly merging OPDs with similar agenda to combat a growing trend of person-driven rather than issue-driven OPDs. This conversation must also include measures that will strengthen under-represented voices and national OPDs' role in enhancing representative voices of persons with disabilities at the regional and local levels.

   Future governance and administrative capacity-building approaches and investment to strengthen OPDs must disrupt the current laissez-faire trend of 'running social clubs' who come together in boardrooms, with little to no accountability, visibility, impact or sustainability. This could be done by factoring in:

   - Earning their space in a capacity-building programme by meeting minimum good governance criteria such as being able to submit evidence of a membership system and internal accountability/communication system between the leadership and members in place.
   - Focusing on action/impact-oriented training where OPDs are supported to put governance and administrative systems in place through very small seed-funding grants for concrete project implementation aligned to each organization's core constituency's needs and organisational service offerings.
   - Avoiding supporting organisations in going from zero to hero in one jump, i.e. going from zero income source and systems into accessing large grants for ambitious projects.

   The review of the National Disability Plan of Action must factor in measures that must be taken to create an enabling environment for OPDs.

2. *Strengthening the Representative Voice of Persons with Disabilities through Meaningful OPD Participation in Governance Processes*

   A structured conversation is needed between duty-bearers (The Government of Eswatini and the UN in Eswatini) and rights-holders (OPDs, not DCSOs) on measures needed to ensure consistent consultation and meaningful participation by OPDs as envisaged in the UN Committee's General Comment on Articles 4.3 and 33.3.

   Immediate measures can be incorporated in the revision of the National Disability Action Plan and as a Guideline under the UNSDCF.

   Medium term measures can be incorporated during the review process of the Act and its Regulations.