Inclusive development - who’s business is it?

“Leaving no one behind” in Norway’s Private Sector Development interventions – are persons with disabilities included and what can we learn from the business community?

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<th>Abbreviation</th>
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<td>ADB</td>
<td>Asian Development Bank</td>
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<td>CRPD</td>
<td>UN Convention on the Rights of Persons with Disabilities</td>
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<td>DFI</td>
<td>Development Financial Institution</td>
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<td>GBDN</td>
<td>Global Business and Disability Network</td>
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<td>Norwegian Employers Association</td>
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<td>Open Mind</td>
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<td>Private Sector Development</td>
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1. Introduction

“Let us work together for a world of opportunity and dignity for all, a future of inclusion, one in which we all gain by leaving no one behind.” These are the words of the former UN Secretary General Ban Ki Moon on the 2030 Agenda on Sustainable Development (SDGs). The SDG framework is based on one core guiding principle; all social groups must be included in the development and growth processes.

Given the magnitude of the task of leaving no one behind, the international community calls for partnership with the private sector in financing global development, and in order to meet the demand for new and decent jobs in developing countries. Investments in the private sector in developing countries is a strategy that responds to this call. Many OECD governments allocate official development assistance (ODA) for interventions that aims to leverage private sector’s contributions and create employment opportunities in poor countries.

Inclusion of marginalized social groups is guiding the Norwegian government’s international development cooperation. One of these groups are people with disabilities. According to the UN, more than one billion people face some form of disability, and most of them live in developing countries. Meeting the SDGs aim of leaving no one behind, will also mean to make development programs inclusive of persons with disabilities.

The research question of this thesis is to investigate whether and to what degree the Norwegian government’s development strategies for investment in private sector is prepared for, and equipped to ensure inclusion of persons with disabilities. By equipped I mean to discuss to what extent policy commitments are transformed into practises in private sector development programs.

By analysing policy documents as well as interviews with key informants in the Norwegian aid bureaucracy, the research question will be answered. Challenges and opportunities as well

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1 UN SG Secretary-General’s statement at the opening of the 9th Conference of States Parties to the CRPD, 14 June 2016
2 UN A/RES/70/1 - Transforming our world: the 2030 Agenda for Sustainable Development
3 Norfund, Investing for Development, 2015
4 Addis Ababa Action Agenda on Development Financing, 2015
6 Norway’s voluntary review on SDG implementation presented at the UN High Level Political Forum on SDG implementation, July 2016
7 WHO, World report on Disability, 2011
as promising practises of disability inclusion in private companies will be discussed as a subtheme. Amartya Sen’s capability approach frames the discussion of disability inclusive development in Norwegian private sector development programs. These empirical findings will be followed by case studies on disability inclusive employment initiatives in the private sector before summing up and presenting the conclusion.

In the following section, I will introduce and elaborate on the main theme.

1.1. Agenda 2030 for Sustainable Development – a framework for inclusive development

Inclusive development is a core principle of the 2030 Agenda for Sustainable Development (SDGs). The SDGs, adopted by the UN General Assembly in 2015, promise to leave no one behind, as development and growth must be inclusive of all – including individuals belonging to the most marginalized groups. The 2030 Agenda grows out of concern for social justice and the recognition that some social groups, including persons with disabilities, have for long been left out of development. The 2030 Agenda thus seeks to ensure, realize and protect universal human rights for all and recognizes core human rights principles of non-discrimination, equality, accessibility, participation and inclusion.

On this backdrop, all contributions to achieving the SDGs need to be shaped in ways that safeguard all social group’s opportunities to access common goods and participate in society. Although the non-binding status of the 2030 Agenda, it frames global development with a focus on equality and universality that aims to ensure that those groups furthest behind are reached first.

There is an increasing recognition that economic growth over the last decades has been uneven. Despite the fact that the number of people living in poverty has declined with more than fifty percent since the early nineties, several social groups are particularly vulnerable to marginalization and discrimination. One of these groups are people with disabilities. The rights of people with disabilities, as enshrined in the UN Conventions on the Rights of Per-

8 UN A/RES/70/1 - Transforming our world: the 2030 Agenda for Sustainable Development
9 UN A/68/95 The way forward: a disability-inclusive development agenda towards 2015 and beyond
10 UN A/RES/70/1 - Transforming our world: the 2030 Agenda for Sustainable Development
11 UN A/68/95 The way forward: a disability-inclusive development agenda towards 2015 and beyond
12 UN A/RES/70/1 - Transforming our world: the 2030 Agenda for Sustainable Development, Para 4.
sons with Disabilities (CRPD), are recognized in the SDGs as a group systematically denied many of their fundamental human rights and freedoms. Disability is explicitly mentioned in the preamble of the framework as well as in several of the SDG targets\textsuperscript{15}. As a globally recognized political platform for partnership between governments and private sector, the SDGs hold a potential for contributing to increased inclusion of persons with disabilities.

1.2. Emerging attention to inclusive development

Over the past 30 years, the world has experienced extraordinary economic growth. Global poverty rates have dropped from 35\% in 1990 to 10\% in 2013 and hundreds of millions of people have come out of poverty.\textsuperscript{16} Such economic growth that increases the GDP is necessary for realizing many of the social and economic rights including good health and access to education and employment.\textsuperscript{17} Economic globalization may also create opportunities for larger markets, new technologies and foreign direct investments. It is however clear, that economic growth by itself is not a sufficient condition for development where no one are left behind, nor does it guarantee that everyone will benefit equally.\textsuperscript{18}

Leaving some people out of the development process is not only a matter of social justice. It is also a violation of core principles in international human rights law - non-discrimination and participation. Large number of individuals are unable to live up to their potential when states fail to invest in public goods and create opportunities for all.\textsuperscript{19}

At the same time, leaving some people out of development, will also negatively affect societies.\textsuperscript{20} The OECD recognizes that societies where some social and economic groups are excluded undermines economic growth.\textsuperscript{21} High level of inequality is associated with economic instability, shorter economic growth cycles and reduces development\textsuperscript{22}.

Based on these recognitions, the UN called for a “no-gap policy”, in which all actors, including governments and the private sector, and within their respective spheres of responsibility,  

\textsuperscript{15} UN A/RES/70/1 – There are references to disability in the preamble (para 19, 23, 25) and goals (4, 8, 10, 11, 17)  
\textsuperscript{16} World Bank, Poverty and Equity Data, Global Poverty Indicators  
\textsuperscript{17} World Economic Forum, Inclusive Growth and Development Report, 2017  
\textsuperscript{18} Stiglitz and Doyle, 2014  
\textsuperscript{19} Stiglitz and Doyle, 2014  
\textsuperscript{20} OECD, Inclusive Growth, 2016  
\textsuperscript{21} OECD, Inclusive Business Fact sheet, 2016  
\textsuperscript{22} World Economic Forum, The Inclusive Growth and Development Report, 2017
should offer necessary opportunities and access to persons with disabilities - on an equal basis with others. The 2030 Agenda for Sustainable Development responds to this call.

1.3. Partnership with business for inclusive development

Private companies are important engines for economic growth, development and employment as they generate 9 out of 10 jobs. According to the UN, creation of decent and productive jobs is the critical link between economic growth, inclusive human development and shared prosperity. ILO estimates that more than 200 million people are unemployed and there are currently not enough jobs to keep up with a growing labour force. Thus the 2030 Agenda calls for partnership with the business community, as the ambitious scope of the SDGs will need investments of a large scale and is essential for implementing inclusive development and growth. The 2030 Agenda further encourages access to credits for small and medium sized enterprises as part of development strategies.

Based on this recognition, many OECD countries are scaling up their Private Sector Development (PSD) programs as part of their Official Development Assistance (ODA). These interventions entail funding schemes for private businesses and Development Finance Institutions (DFIs). The overall aim of these funding schemes is to use aid strategically to mobilize private investments that promote development and create new jobs. The development effect from investments in private sector is explained in these terms: reducing obstacles for enterprises such as lack of electricity and finance will create more and decent jobs, these companies will purchase goods and services from local enterprises, workers pay taxes and spend money in local markets, enterprises grow and hire more workers.
Norway is one of the OECD countries that give priority to PSD programs in their international development cooperation. The Norwegian Government has highlighted that investments in private sector as part of Norway’s development cooperation is an essential contribution to realizing the SDGs and create new and better jobs in developing countries. The government further emphasise the need to safeguard people with disabilities’ right to work in the PSD programs. This commitment was also confirmed in Norway’s 2016 voluntary SDG report to the UN High Level Political Forum. Further, Norwegian policies and statements explicitly highlight that Private Sector Development should foster inclusive economic growth.

Despite this heightening attention to inclusiveness in development policies and strategies for contributing to the SDGs, there seems to be unexplored links between policy frameworks and operationalization through PSD as a channel of Norway’s ODA. This assumption establish the rational for the research question in this thesis.

1.4. People with disabilities – a group left behind in development

Human rights are set out in the International Bill of Human Rights and other international treaties and declarations. While these human rights frameworks apply equally to persons with disabilities, the UN Convention on the Rights of Persons with Disabilities (CRPD) is the main international treaty that recognizes and explains what these rights mean specifically for per-

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sons with disabilities.\textsuperscript{36} With the CRPD, disability is recognized as a human rights issue and the CRPD strengthens already established human rights. Article 32 of the CRPD contains a specific duty for state parties to engage in cooperation with each other to ensure that all programs are ‘inclusive of and accessible to persons with disabilities’.\textsuperscript{37}

The CRPD has advanced the international normative framework greatly, but the UN is concerned about a lack of policy commitments and accountability mechanisms for ensuring that persons with disabilities are included in development efforts\textsuperscript{38}. This lack of commitment has limited opportunities for persons with disabilities to access essential resources, facilities and services that are available to the rest of society.\textsuperscript{39} The concern for lack of disability inclusion has also been extended to international development cooperation, in which persons with disabilities often are left out.\textsuperscript{40} This has been documented in several studies including a comprehensive evaluation of Norway’s development cooperation, commissioned by Norad and launched in 2012.\textsuperscript{41} This evaluated provided evidence that persons with disabilities have to a large degree been excluded from Norway’s development programs between 2000 and 2010\textsuperscript{42}. A more recent Norwegian study has not yet been undertaken.

The fact that the SDGs now call for all stakeholders to ensure inclusiveness in policies and practise is good news for persons with disabilities. Further, the Addis Ababa Action Agenda for Developing Financing has emphasised that job creation initiatives should be inclusive of persons with disabilities (para 16).\textsuperscript{43} The challenge is however how government respond to this commitment in the aid architecture including in Private Sector Development initiatives.

This thesis takes the approach that governments aiming at operationalization SDG commitments through private sector development initiatives, will not succeed unless policies are transformed into explicitly inclusive practises that identify the opportunities and mitigate the

\textsuperscript{36} Stein, Disability, Development, and Human Rights: A Mandate and Framework for International Financial Institutions, 2013
\textsuperscript{37} Stein, Mainstreaming and accountability: (Really) including persons with disabilities in development aid and humanitarian relief programming, 2013
\textsuperscript{38} UN A/68/95 The way forward: a disability-inclusive development agenda towards 2015 and beyond
\textsuperscript{39} UN A/68/95 The way forward: a disability-inclusive development agenda towards 2015 and beyond
\textsuperscript{40} UN, Disability and the Millennium Development Goals - A Review of the MDG Process and Strategies for Inclusion of Disability Issues in Millennium Development Goal Efforts, 2011
\textsuperscript{41} NORAD, Mainstreaming disability in the new development paradigm Evaluation of Norwegian support to promote the rights of persons with disabilities, Ingdal et al., 2012
\textsuperscript{42} Ibid.
\textsuperscript{43} Addis Ababa Action Agenda of the Third International Conference on Financing for Development, 2015, para 16
barriers for participation of persons with disabilities. This thesis thus aims at assessing to what extent Norway’s ODA funding of investments in private sector is contributing to the core principle of the SDG; leaving no one behind.

The business community has engaged in the SDG discourse, and some companies have expressed interest in contributing to the SDG agenda. A number of companies have also engaged in disability inclusive employment without established link to the SDGs. A sub question of this study is whether the business community may hold some keys fit to unlock the potential for disability inclusion in PSD initiatives, with a particular focus on inclusive job creation.

Hence, the research question is:

*To what extent are Norway’s Private Sector Development initiatives inclusive of persons with disabilities coherent with policy commitments and the SDGs?*

Sub questions:

- What are the obstacles and potentials for including persons with disabilities in these programs, which aim at creating jobs in the global market?

- What can we learn from empirical examples on inclusive employment in the private sector?

1.5. Thesis structure

This thesis is structured in six chapters. This introduction to the topic is followed by a chapter describing the choice of methods, scope and thesis limitations. Chapter three introduces and discusses disability inclusive development within the frame of Amartya Sen and Martha Nussbaum’s theories on the capability approach. This approach is a useful framework for understanding and discussing opportunities and mitigation of barriers for disability inclusion in Norway’s interventions for private sector development. Before answering the research question, the concept of private sector development as a channel for development aid is briefly introduced as a contribution towards SDG 8, which aims to achieve universal access to employment. Chapter four will introduce Norway’s commitment towards this goal by channelling development aid through investments in private companies. The main body of the thesis is chapter five and chapter six. Chapter five analyses the findings from the semi-structured interviews and discuss how Norfund and Norad interpret inclusive development and to what extent these government bodies relate to the policy commitment to ensure that no one are left behind. The sub-question related to obstacles and potentials is discussed in this chapter. Chapter five is structured along some core elements for ensuring responsible business behavior which entail risk identification and mitigation, active ownership, guiding and reporting. The sub theme; asking what we can learn from business, is addressed and discussed in chapter six. This chapter illustrates, by three different cases, how Telenor, L’Oréal and NHO members that are part of the Ripples in the Water program,
work to promote opportunities for persons with disabilities to become included in the workforce on equal terms with other people. Based on the findings from the interviews with these organizations, this chapter summarises some good practises which potential to inform Norway’s private sector development initiatives. Chapter seven will draw some final conclusions from the findings and discussions and present some suggestions for increased disability inclusion.

2. Methodology

2.1. Choice of method

The choice of method is based on the nature of the concept of inclusive development as a human rights principle. The overall aim of this thesis is to contribute to conceptual clarity of inclusive development, and assess the potential for its operationalization in private sector development programs that is disability inclusive and in line with human rights principles. The thesis takes a qualitative approach. According to Landman, qualitative methods seek to identify and understand the meaning of the object of enquiry.44 The notion of inclusive development holds different conceptual meanings that may affect the transition from policy to practice.

With the interdisciplinary approach of this study, drawing on human rights law, politics and social science, I have chosen to answer the research question by what Landman describes as a social science method that builds on contextual analyses suitable to analyse social phenomena that involve human rights.45

By this method, I have tried to establish a connection between the research question, the theories on disability participation, human rights law and the principle of inclusion in policies and empirical evidence of their uptake in development practises.46 It has therefore been crucial for me to adopt what Landman refers to as a discourse-analytic technique that seeks to elucidate the object of study (disability inclusion in the PSD programs) by pursuing their description, understanding and interpretation.47 As the research questions is based on seeking interpreta-

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44 Landman, Studying Human Rights, 2006
45 Landman, 2016, p. 58
46 Landman, 2016, p. 68
47 Landman, 2006, p. 61
tion of the abstract concept of inclusive development, I have opted for such qualitative discourse-analytic method for this study.

Despite the limitation of a single-country study of a global concept, this study of Norwegian development and human rights policy, gives opportunity for exploring in some detail understandings of a human rights problem, that is, exclusion of people with disabilities as rights holders, and in principle targets of Norway’s official development cooperation. The study also gives opportunity to explore the requirements of inclusion inherent in the SDGs, and how this is reflected by Norway's development policies and strategies.48

I have chosen to reply the research question by giving particular attention to persons with disabilities as an illustration of inclusive development. This choice is made of two reasons. First, disability is one of the groups recognized in the SGDs and numerous UN reports as one of the groups frequently excluded from development as well as I a professional interest in disability rights. Second, unlike other human rights treaties, the CRPD is the UN treaty that most explicitly express state parties’ obligations to ensure inclusiveness in international cooperation.49

2.2. Data

The thesis addresses theories of inclusive development, and examines how the theories adapted for this thesis is applied when the Norwegian Government as a donor develops grant schemes for private sector development. The data contains relevant Norwegian policies and strategies in the field of international development cooperation, human rights and private sector development. In order to link Norwegian policies to the overall agenda for sustainable development, the empirical analyses is supported by relevant international reports and documents developed by the UN and other international organizations.

A systematic search for academic research and studies on inclusive development and growth was conducted through the University of Oslo library BIBSYS. It became clear from my extensive search that there is limited research that seek to establish meaningful interpretation and links of the concept of inclusive development and how it can be made operational in international cooperation50. I used Sen’s capability approach as a theoretical framework for the notion of disability inclusive development51. Further, I explored a study by Gupta et al. that

48 Landman, 2006, p. 69
49 CRPD, Art. 32
50 It should be noted that newer studies on inclusive development have been launched in the last months of writing this thesis.
51 Sen, Development as freedom, 1999
seeks to establish a theory on inclusive development that capture the multidimensional notion of inclusive development.\textsuperscript{52} A recent book published by Judith Teichman was useful as she pointed to the importance of government politics.\textsuperscript{53} Academic sources on economic growth and inclusiveness, made extensive references to a synthesis study on inclusive development of the Asian Development Bank (ADB) from 2009 that is comprehensive and covered the relations between inclusive growth and development.\textsuperscript{54}

In order to find credible empirical evidence to support examination of the research question on experiences with business’ contribution to inclusive development, I also searched for data in UN sources and reports by international organizations.

Human rights principles are embedded in the Norwegian Government’s overall strategies for international development cooperation and action plans. I have assessed several policies, speeches and statements by search for coherence in Government commitments and tried to match these with examining aid budgets, directives and indicators to identify commitments, political ambitions and practises.

Interviews with key informants complemented this assessment and were helpful in understanding how the overall aim translated into meaningful implementation in line with core human rights principles.

2.3. Interviews

According to Landman, discourse-analytic techniques seek to elucidate understanding and interpretation.\textsuperscript{55} My intention has been to seek this understanding by carrying out interview with relevant stakeholders involved in implementing the Norwegian Government’s development policies. Interview data about the potential for including all marginalized groups in Private Sector Development programs has been collected by semi-structured interviews with informants from two main groups. These groups are

1. Norwegian government officials in the Norwegian aid bureaucracy and public partners that administer Norway’s grant schemes. The group included eight persons in the

\textsuperscript{52} Gupta et al. Towards an Elaborated Theory of Inclusive Development, 2015
\textsuperscript{53} Teichman, The politics of inclusive development, 2017
\textsuperscript{54} Ganesh and Ravi, Inclusive growth and inclusive development: a review and synthesis of Asian Development Bank literature, Asia Development Bank, 2009
\textsuperscript{55} Landman, 2006, p. 61
Norwegian Ministry of Foreign Affairs, Norad, Norfund, OECD National Contact Point as well as Innovation Norway.

2. Representatives from the business community. This group included five representatives from Telenor Open Mind Norway, Telenor Khuddar Pakistan, L’Oréal in Paris, Ripples in the Water/NHO.

The aim of interviews of group 1 was to assess how the government officials interpreted the Norwegian policies and see the potential for including the most marginalized groups in line with the SDGs and human rights duties.

The interviews were semi-structured. Using the semi-structured interview technique allowed ideas, perspectives and personal reflections to develop during the interviews and thus provided information not found in policies and government documents. The flexibility of this approach was important in order for me to make a critical assessment of which considerations were most relevant to the informants.

Given their knowledge of the topic, the semi-structured interviews intended to allow the informants to share their personal opinions and bring up new ideas or dilemmas that was not included in the interview guide. The topic and key questions developed were distributed by email to the informants before the meetings and served as guideline giving them a notion of the subjects that were brought up.

The first group include representatives from the Norwegian Ministry of Foreign Affairs, Norad, Norfund, Innovation Norway as well as the Norwegian OECD National Contact Point. The interviews provided good insights on how the officials relate the principle of inclusive development of the SDG framework and human rights obligations to these funding schemes.

The other group of informants consisted of representatives from the business community in Norway and in the ILO Global Business and Disability Network. In Norway, I spoke with Telenor, and representatives from the Norwegian Employer Association, NHO, including the Ripples in the Water project. I have also interviewed representatives of members of the ILO Global Business and Disability Network (GBDN) including L’Oréal and Telenor Pakistan.

56 Landmann, 2006
I recorded most of the interviews on tape. This made it possible for me to go back and listen to the recordings during the process of writing. I found all my informants well prepared and very accommodating, and the interviews were conducted in a good atmosphere.

2.4. Status and reliability of data

The SDGs were adopted in 2015 and searching for their uptake in Government policies and practises in such short timespan may meet some weaknesses. I am aware of this limitation, still I have embarked on this method due to the following reasons;

- The notion of inclusion builds on universally agreed human rights principles and norms in development cooperation
- In Norway, inclusion of marginalized groups, including persons with disabilities, has been a target group in Norway’s development cooperation on human rights since 2010 confirmed by policies on development cooperation and human rights.57
- The interviews with Government staff would provide the information missing in Government policies

For these reasons, the discourse-analytic technique would help me to illuminate how the Government had prepared or started to plan for, interventions that reflected the core values of the SDGs.

The international reports on inclusive development and growth theories are largely published by international organizations and development banks. However, many of these reports are based on global data collections and recognized economic models, including the sources from the World Economic Forum, World Bank as well as the UN reports.

The research articles and books from the UiO BIBSYS source consisted of books and reports published in international research journals. There are numerous studies on inclusive development, disability inclusion but there are very few academic studies in the field of disability inclusion and private sector development cooperation. I thus had to assess and compare literature and theories on disability inclusion, inclusive development and inclusive growth and compare these theories with government development policies on private sector development. The research gap between disability inclusive development and private sector in development cooperation made the analyses challenging, and my ambition is to contribute to fill this gap.

57 Norwegian MFA, Meld. St. 10 (2014-2015) Opportunities for All: Human Rights in Norway’s Foreign Policy and Development Cooperation
2.5. Scope and limitations

This thesis will answer the research question within the scope of Norwegian international development cooperation.

I have decided to exclude Norway’s financial support to the multinational institutions and the Asian and African development banks although these banks have programs for private sector development included in their operations.

The conceptual notion of inclusive development and theories of capabilities are universal in scope and I have discussed the theories and approached without limitation to a development cooperation context. The empirical findings are however discussed in the context of development cooperation.

The concept of business due diligence entails risks connected to financial risks and environmental damage as well as human rights violations. For this study, risk management is discussed only in relation to human rights.

3. Theoretical approach and conceptual discussion on inclusive development

Inclusive development is a well-established norm in international human rights law and is an overarching principle of the SDGs. Still, there is no commonly agreed definition of the notion of “inclusive development” despite the fact that the concept has infused several key development policies and UN documents.58 In order to understand how development planners and governments are embarking on inclusiveness as suggested by the SDGs, it is useful to establish a theoretical approach to inclusion that will inform the discussion of the research question.

Amartya Sen has developed a useful approach for this thesis, which is anchored in the theory on capabilities.59 I will present this approach as well as the core concepts for my study; inclusive development and inclusion of persons living with disabilities.

59 Sen, Development as freedom, 1999
3.1. What is inclusion?

Inclusion may be defined as an act of including someone as part of a group and the idea that everyone should be able to use the same facilities, take part in the same activities, and enjoy the same experiences, including people who have a disability or other disadvantage.\(^{60}\)

In international human rights law, participation, non-discrimination and equality are core human rights principles and values that is closely linked to the notion of inclusion which states have a responsibly to ensure.\(^{61}\) Inclusion is thus about removing the barriers that obstructs the person or the group from taking part in the same facilities, activities and experiences as everybody else.\(^{62}\)

Applying the concept of inclusion in the context of disability will mean to ensure that persons with disabilities have opportunities to access essential resources, facilities and services that are available to the rest of society.\(^{63}\) This mean that explicit measures must be taken to remove barriers that deprive persons with disabilities from opportunities to access and enjoy all fundamental freedom as the rest of the population.\(^{64}\)

3.2. The capability approach – a framework for understanding inclusive development

Inclusion is justified by internationally adopted human rights with the universal principles of equality and non-discrimination. A person has a right to be included, but inclusion may also be understood as a way of broadening human freedoms to accommodate the individual’s ability and choice to participate and function in the society.\(^{65}\) The concept of inclusion may thus be explained in light of Amartya Sens theories on capability and function.\(^{66}\)

According to Sen, development can be understood as a process of expanding real freedoms that all people enjoy.\(^{67}\) Sen emphasizes the moral importance and claim of freedom for each

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\(^{60}\) Cambridge Dictionary’s definition of inclusion, 201

\(^{61}\) Stein, Mainstreaming and Accountability, '(Really) Including Persons with Disabilities in Development Aid and Humanitarian Relief Programming', 2013

\(^{62}\) Teichman, 2016

\(^{63}\) UN A/68/95 The way forward: a disability-inclusive development agenda towards 2015 and beyond

\(^{64}\) Stein, Mainstreaming and Accountability, '(Really) Including Persons with Disabilities in Development Aid and Humanitarian Relief Programming', 2013

\(^{65}\) Nussbaum, Women and Human Rights, 2000, p. 101

\(^{66}\) Sen, Development as Freedom, 1999

\(^{67}\) Sen, Development as Freedom, 1999
individual to achieve well-being, influence, participation and self-determination in order to live a good life. The capability approach connects a person’s freedom to achieve well-being in life to what the persons is able to do and to be to achieve the life the person values. Capability refers to the opportunity and ability to do something while actual functioning entails that the individual is actually engaged in the activity in question. The approach ask for what are the opportunities for a parson to achieve what she or he values. The approach is thus useful to explore the connection between poverty, justice and equal opportunities.

According to Sen, economic growth alone cannot guarantee well-being for all unless the barriers for the individual’s substantive freedom are removed. These sources of barriers have to be removed in order to enjoy the freedom and opportunity to make choices. What a society provide of resources to remove such barriers, whether they are social or economic, physical on non-material, can be a catalyst of inclusiveness. Lack of accommodating freedoms and participation will according to this theory, deprive individuals form functioning or exercising freedoms.

The approach may be useful to translate the language of human rights in all cultural contexts and traditions. Martha Nussbaum advocate for this position as she points to what resources an individual will need to bring differently situated persons up to the same level of capability to function. The notion of justice is rooted in most societies even if the language of rights is not, and endorsing human rights from the perspective what a persons is able to may add value in cross cultural settings. E.g. with the capability approach, the right to work may be understood in terms of how to enable a person to enjoy the opportunity to work. Still, the language of rights is important says Nussbaum, as it adds extra weight to the politics that provide people with opportunities to make choices to function according to their abilities.

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68 Sen, Development as Freedom, 1999
69 Sen, Development as Freedom, 1999
70 Ibid.
71 Nussbaum, Women and human development, 2000
72 Nussbaum, Women and human development, 2000, p. 99
3.3. Understanding disability inclusion with the capability approach

Persons with disabilities often experience systematic exclusion and discrimination without having opportunities to make choices according to their abilities. Disability may be understood as a concept that appears in the interaction between the individual and the society. Disability occurs when an individual is deprived of practical opportunities as a result of an impairment that can be physical as well as mental and cognitive. Disability inclusion is about identifying and removing the barriers that place restrictions on the person’s functioning in order for the persons with a disability to exercise all rights and freedoms and participate on equal terms with others in all areas in life e.g. education, family life and employment. The CRPD applies human rights to disability, thus making general human rights specific to persons with disabilities.

Sen’s capability approach provides a framework for construction of the overarching SDG goal inclusive development and the opportunities of persons with disabilities to be included in the SDG outcome. The rationale for applying this approach in the discussion of disability inclusion is that this approach addresses the issue of equal opportunities as means for expanding the freedoms of persons with disabilities to do or be what they value.

Inclusive development is therefore about enabling persons to make these choices. A person with a disability may face limits and barriers. The background conditions for participation is unequal, and the question is what does it take to equalize the persons’ actual level of opportunity for functioning.

According to Sen’s approach, capability is understood as a practical opportunity. In order to take advantage of the opportunities, e.g. to access education, to work or participate in social life, these barriers will have to be removed. Capability is also about empowerment according to Martha Nussbaum. People are more satisfied, she argues, when they are active choice-makers in their own lives. Removing barriers for inclusion is not only initiated by those who

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73 UNESCO, 2014
74 CRPD, Article 2 recognizes disability as “an evolving concept, and states that persons with disabilities “are those who have physical, mental, intellectual or sensory impairments, which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others”.
75 Mitra, Capability Approach and Disability, 2006
76 Mitra, Capability Approach and Disability, 2006
77 Mitra, Capability Approach and Disability, 2006
78 Nussbaum, 2000, p. 302
are powerful, it is often the political repose to people who are empowered and know which barriers that need to be removed and how to make their claims heard through their representative organizations. Capability is thus making use of the political as well as practical opportunity and ability to achieve what is valued important for each person with a disability. Drawing on Sen’s capability theory, a disability occurs when an individual is deprived of such opportunities or as a result of interaction between the impairment, available resources and the environment. The political goal is thus enable functioning by support mechanisms e.g. provide sign language interpretation in order to benefit from education or ensure physical access at the workplace.

According to Nussbaum, the capability approach is closely related to a “focus on human equality” as it entails policy responses to ensure overcome discrimination that is linked to the human capabilities. For a person with a disability, governments have to provide mechanisms that enables equal access to social goods, e.g. employment, in order to level the playing ground for functioning. Ensuring equality for persons with disabilities in working life is about protecting the person from discrimination in policies and practices and accommodate participation in the workforce on equal terms with others. Provided the right educational and material support, persons with disabilities can become fully capable of all human functions, including to participate in working life. The UN Convention on the Rights of persons with Disabilities reflects this responsibility as a duty of states to recognizes the abilities of persons with disabilities in the labor marked (Art 8) and ensure reasonable accommodation at the workplace (Art 27, i).

3.4. Conceptual definitions of inclusive development and growth

Human equality and opportunities for living a life in dignity is what frames the 2030 Agenda on inclusive development. The concept of inclusive development is guided by international human rights principles of participation, non-discrimination and accountability, including the right to development. The 1948 Universal Declaration of Human Rights highlights the universality of all human rights for all human beings, which has been reaffirmed repeatedly in human rights treaties and declarations.

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79 Nussbaum, 2000, p. 86
80 Nussbaum, 2000, p. 80
81 Ibid. p. 83
82 Teichman, The Politics of inclusive development, 2017
Despite the fact that inclusive development as a concept now has infused several key development policies, there is no commonly agreed definition of the concept.\textsuperscript{83} For the purpose of this thesis, it is therefore more fruitful to investigate what inclusive development encompasses and understand the concept as an \textit{approach}. By doing so, some core elements stand out as striking similar to the capability approach, including the creating opportunities and mitigate deprivations that prevent people of all abilities from participating fully in society.\textsuperscript{84}

UNDP emphasises that inclusive development will only take place and lead to poverty reduction and growth if all groups of people contribute to creating opportunities, share the benefits of development and participate in decision-making.\textsuperscript{85} Inclusive development is also referred to as an adaptive learning process, which responds to change and new risks of exclusion and marginalization.\textsuperscript{86} Inclusive development is thus not a one-time achievement but need constant review of politics that analyse and mitigate barriers that prevent some people from participating fully in society.\textsuperscript{87}

Amartya Sen’s perspectives on human development has been influential in changing the notion of development to a people-centered concept and introducing a new approach for advancing human wellbeing. Measuring human wellbeing rather than richness of the economy is an approach that focus on people and their opportunities and choices.\textsuperscript{88} Understanding development as a people-centered process is confirmed by the Declaration on the Right to Development. The declaration encompasses the human \textit{person} is the prime subject of development.\textsuperscript{89}

The 2030 Agenda has developed this concept of development further as it aims for \textit{equitable} access to all human rights outcome and well-being for all. This framework thus reflects Sen’s capability approach as the agenda conditions that the most marginalized should be \textit{reached first} by inclusive and participatory efforts.\textsuperscript{90} In line with Sen’s capability approach, inclusive development thus encompasses that states must take steps to identify and target the most disadvantaged or marginalized in the society.\textsuperscript{91} The capability approach to disability inclusive

\textsuperscript{83} Gupta et al. Towards an Elaborated Theory of Inclusive Development, 2015
\textsuperscript{84} Teichman, The Politics of inclusive development, 2017
\textsuperscript{86} Gupta et al. Towards an Elaborated Theory of Inclusive Development, 2015
\textsuperscript{87} Teichman, The Politics of inclusive development, 2017
\textsuperscript{88} UNDP, Human Development Report, 2016
\textsuperscript{89} UN Resolution 41/128, Article 2.1.
\textsuperscript{90} UN A/RES/70/1 Transforming our world: the 2030 Agenda for Sustainable Development
\textsuperscript{91} OHCHR, Fact Sheet on Human Rights and Development, 2002
development would thus mean that programs that aim at economic empowerment in developing countries must be made accessible also for people with disabilities by removing the barriers for participation – structural, environmental as well as behavioral.

Inclusive growth is emphasised in SDG 8. Asia Development Bank (ADB) highlights that inclusive growth can be interpreted narrow or broadly. The narrow interpretation implies a focus on economic growth, in which expanding human capabilities is regarded as instrumental to improving economic outcomes. ADB suggest a broader interpretation of inclusive growth that highlights inclusive development that emphasizes non-income measures of well-being and valuing human capabilities, such as good health and literacy, primarily as human development outcomes, not as instruments to accelerate economic growth. Lack of these capabilities may thus be regarded as an indicator of inclusive development.

Amartya Sen recognises the importance of economic growth, but points to the problematic narrow approach if development is merely growth without human development. He argues that economic growth cannot be valued if it do not contribute to development of people's capabilities. Thus it has to be accompanied by policies that ensure the freedoms of those furthest behind and not only the lowest hanging fruit. Economic growth is only inclusive if all people benefit from the growth process. Inclusive development is thus the relationship between inequality and economic growth, and governments must respond to this relationship with structural and institutional in-country economic policies.

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92 Asia Development Bank, Inclusive Growth Criteria, 2014
93 Ibid.
94 Sen, 1999
95 Sen, 1999
The UN Convention on the Rights of Persons with Disabilities (CRPD) provide guidance to inclusive development. This human rights convention guides the international normative framework for the advancement of persons with disabilities in society as well as in development. In the preamble to the convention, the state parties emphasize the importance of mainstreaming disability issues as an integral part of relevant strategies of sustainable development. Unique among human rights treaties, the CRPD includes a specific, inclusive development provision. Article 32, paragraph 1, specifically imposes a duty for state parties to ensure that international development interventions are inclusive of, and accessible to, persons

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with disabilities\textsuperscript{98}. Article 32 of the CRPD is thus coherent with SDG goal 17 on means of implementation (para 39-40).\textsuperscript{99}

As inclusive development is about participating in the development process, a person with a disability is not only an object in the development process, but may also contribute to its outcome. Mitigating the barriers for a person with disability to participate in the development process is not only a duty of the state, but enabled a person with disability to become an active participant in the development process.

It should be noted that the 2030 Agenda is not relying on official development assistance (ODA) alone for realizing inclusive development. The SDGs emphasize that states have the prime responsibility for inclusive development. Inclusive development depends also of responsive government institutions and is thus a political struggle that requires a committed leadership in order to mitigate the barriers for equal opportunities\textsuperscript{100}. Still, the SDGs encourage states to share the responsibility for the process towards a life in dignity for all.

3.5. Disability inclusive development in Norway’s international cooperation

According to Nussbaum, the human worth and agency crosses cultural boundaries. Still, the human worth of persons with disabilities is often less valued than non-disabled in many societies and their capabilities are not promoted.\textsuperscript{101} Development cooperation hold potentials for promoting the opportunities and freedoms of persons with disabilities in societies where their rights are not respected and protected.

Stimulating growth in ways that generates more and better jobs may be effective in helping people out of poverty.\textsuperscript{102} But even when better jobs and opportunities are available, persons with disabilities very often are very excluded from the labour marked. They often experience multiple barriers including social and structural discrimination which in turn affects health and education outcomes that reinforce exclusion in job markets.\textsuperscript{103} Human rights and policy goals, including the SDGs are responding to this challenge, as the overarching frameworks for

\begin{flushright}
\textsuperscript{98} CPRD/CSP/2013/3Disability-inclusive development in national, regional and international processes
\textsuperscript{99} Transforming our World……. para 39 and 40
\textsuperscript{100} Ibid.
\textsuperscript{101} Nussbaum, 2000
\textsuperscript{102} Asia Development Bank, 2009
\textsuperscript{103} DFID, Economic Development Strategy: prosperity, poverty and meeting global challenge, 2017
\end{flushright}
Norway’s international development cooperation. Human rights cuts across all interventions and is guided by the core principle of “leaving no one behind”.

Norway has highlighted its intention to promote and protect human rights in a coherent way and in all sectors and all areas of international cooperation. “Equality and equal opportunities” is one of three priority areas in the Norwegian human rights and development policy, which includes intensifying the efforts to fight discrimination and improve the situation of vulnerable groups, including persons with disabilities.

In 2015, the Norwegian government launched the white paper ”Working Together” on investments in private sector development in international cooperation. According to this policy, all private sector development initiative aim to mobilize activities in local business and contribute to inclusive and sustainable growth. Disability rights is now included in the policy as well as in the government’s National Action Plan for the implementation of the UN Guiding Principles on Business and Human Rights.

Norway ratified the UN CPRD in 2013 and developed a disability and development policy which states “it is important to view issues relating to disability as an integral part of sustainable development strategies”. This reflects the Preamble of the CRPD which states: “the importance of mainstreaming disability issues as an integral part of relevant strategies of sustainable development”. According to the CRPD, Article 27, state parties have a duty to raise awareness on the capabilities of “promote recognition of the skills, merits and abilities of persons with disabilities, and of their contributions to the workplace and the labour market”.

3.6. Summing up

The capability approach is useful in understanding the importance of mitigation of barriers for ensuring opportunities and participation of the most vulnerable groups in the development process. Understanding inclusive development as removal of “sources of unfreedom” add
meaning to the inclusive development discourse. Sen’ approach must however be viewed in light of how to respond to the lack of opportunities in order to transform the philosophical approach to practical changes in people’s lives. States are bound by their duties towards human rights law, and political responses to inequality will have to be guided by these obligations. Sen points to the fact that facilitating rights and freedoms are effective in contributing to economic progress. Inclusive growth theories do thus not need to be seen contradicting between a human rights and economic justification for inclusive development. What is important, is how government implement their programs for inclusive growth in ways that are based on human rights principles in order for all persons, including persons with disabilities, to have freedom to enter markets and take part in economic growth. Drawing on the theories on inclusive development and the capability approach, the Norwegian Government will have to apply human rights based approaches, grounded on fundamental human rights principles that include all groups in society, in order to contribute to inclusive development in line with commitments to Agenda 2030. Such approaches will have to cut across all priority topics and sectors including programs for PSD.

The CRPD is the only human rights conventions with a specific inclusive development provision (Article 32). This convention is the most explicit human rights convention that imposes a duty of state parties to ensure development cooperation is accessible to, and inclusive of, persons with disabilities.

The next chapters will describe and analyse how Norway is exercising this duty to ensure inclusive approaches and non-discrimination in government funded private sector development initiatives.

4. Private Sector Development - a potential strategy for inclusive development

4.1. Private Sector Development and inclusive development

As explained in the introduction, many states have committed themselves to cooperate with the private sector towards inclusive economic growth that enables all people to benefit from the growth processes - including through enhanced official development assistance (para 43).
The core principle of inclusion, will have to permeate all initiatives towards the goals, including efforts to create jobs in the global market. Thus, governments must address the barriers that restrict people with disabilities to access the labour market and apply measures to mitigate these barriers in job creating programs. By mitigating barriers, investments in private companies for job creation, have a potential for contributing to well-being, dignity and finally inclusive development.

According to the UN Guiding Principles on Business and Human Rights (UNGP), government development agencies and development finance institutions (DFI) have to explicitly consider “actual and potential human rights risk of beneficiary enterprises”, in order to mitigate risk for supporting human rights harm. Donors have a duty to adopt measures necessary to ensure that private companies that access funding for job creation do not discriminate on prohibited grounds but rather contribute to the inclusive development agenda. The failure to take the necessary measures in order to ensure the PSD are accessible to, and inclusive of all without discrimination, constitutes a violation of the state’s human rights obligations.

4.1.1. Norway’s strategy for Private Sector Development funding

Private Sector Development is a priority area in Norway’s development cooperation. The budgets for private sector development projects and development investment have more than doubled over a period of ten years.

Figure 3: The table below gives an overview of Norway’s budget allocation for private sector development initiatives through Norad and Norfund over the last 10 years in million NOK. (budget line 161 of Chapter 03.) Multinational organisation, development banks and innovation is not included in these budget lines.

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Norfund is Norway’s Development Investment Fund (DFI) and is state-owned risk capital investment fund, which operates under a mandate from the Norwegian Government. The

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112 UN Guiding Principles on Business and Human Rights, Commentary to State-Business nexus, 4.
113 UN CESCR Draft GC E/C.12/60/R.1
114 UN CESCR Draft GC E/C.12/60/R.1
116 Norfund, Investment for Development, 2015, p. 16
Norfund is the key instrument of Norway’s support to PSD and is expected to contribute to development effects in poor countries and contribute to poverty reduction. Norfund is the largest recipient of Norwegian ODA funding for PSD interventions. Norfund invest in three priority sectors; clean energy, financial institutions, food and agribusiness. Strategic sector priorities are linked to SDG 8 and 16. Norfund invest in countries that have ratified most core human rights treaties and is guided by the IFC Environmental and Social standards. The IFC standards are aligned with the UN Guiding Principles (UNGP) and provide guidance on how to identify and manage risks related to social, financial and environmental risks including human rights risks.

Norad is Norway’s agency for development cooperation and is responsible for management the other funding schemes for private sector development. These schemes include 1) Enterprise Development for Jobs 2) Building Skills for Jobs – Technical and Vocational Education and Training and 3) Cooperation on Framework Conditions for Private Sector Development in the South. The Enterprise Development for Jobs aims at contributing to job creation in developing countries by stimulating the establishment of new business enterprises or expansion of existing ones. Grant scheme rules and regulations were developed by Norad in 2016.

The table above shows that funding for Norfund has increased over the last ten years, while funding for smaller grants administered by Norad has decreased despite the political attention to private sector development cooperation. Additional funding allocations in 2017, is not included in this table.

The next chapter will analyse and discuss the uptake of policy commitments in the PSD interventions.

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117 Norfund, Investment for Development, 2015
118 Nordic Consulting Group, Investments to support sustainable development, 2015
119 Ibid.
120 IFC are the World Bank Group’s performance standards for International Finance Institutions.
122 Norad, see: https://www.norad.no/en/front/funding/private-sector-development/
124 Norad, Grant Scheme Rules for PSD: https://www.norad.no/link/c1f4f63080eb41b9aa4c54182c4250e.aspx accessed 3 April 2017
5. Discussion of the evidence and analyses of obstacles and opportunities for disability inclusive Private Sector Development Initiatives

5.1. Empirical evidence and findings

The Norwegian Government points out some core measures for promoting human rights in the private sector development initiatives that aims to contribute to the overall goal of inclusive development in the private sector. These measures include risk analyses, active ownership policy and guidance of grant recipients. The measures guide the structure of this chapter. Reporting is added as an important and challenging measure for human rights monitoring that this chapter addresses.

5.1.1. Non-discrimination and inclusion in risk assessment procedures

5.1.1.1. Norfund

The UN Guiding Principles suggests that states should encourage and require human rights due diligence performed by companies that receive financial support from development agencies like Norad or Norfund. According to the 2015 Annual Report, Norfund demand that companies invested in adhere to human rights standards, which is “thoroughly reviewed before investment agreements are closed”.

Risk assessment and due diligence procedure are explained at the Norfund webpage, but more specific procedures is however not communicated publicly. According to the Norfund informant, assessment of non-discrimination is part of the due diligence procedure which included “gender, ethnicity and all other possible discrimination factors that we do not accept and are clearly described in IFC’s standards”. As the reports from the assessments are not publicly accessible and there is limited transparency in how risk analyses address non-discrimination. Due to this lack of transparency, it is challenging to get a proper understanding of to what extent full human rights due diligence assessment is performed. Despite the revision of the IFC standards to meet UNGP standards, the IFC standards do not state how the due diligence should be performed. It is therefore the re-

126 UN Guiding Principles, 1. B. 4. Commentary p. 17
127 Norfund, Annual Report 2015
128 Nordic Consulting Group, Investments to Support Sustainable Development, 2016
129 Norfund, interview, NF 1, March 2017
sponsibility of Norfund to interpret possible risks related to discrimination and exclusion in the investing companies.

According to the 2015 annual report, Norfund demands compliance requirements above international standards in protection of rights of vulnerable groups “where these rights are poorly implemented”.\textsuperscript{130} Still, the report does not provide any information what has been done to compensate for failure to address discrimination of vulnerable groups. The Norfund informant did however confirm that such human rights implementation gaps were not addressed in their programs. The informant reflected in the interview that they found it complicated and not feasible to add topics of discrimination of certain groups e.g. disability, in the due diligence procedures.\textsuperscript{131} As the informant explained, the due diligence procedures were often carried out in cooperation with other donors like SWEFUND. Adding issues of marginalization and discrimination of certain groups in investment policies and in due diligence procedures would therefore be challenging from Norfund’s point of view.

However, according to the UNGP principles, states have a general responsibility to guide businesses “how to consider effectively issues of gender, vulnerability and/or marginalization” and recognise the specific challenges of several explicitly mentioned marginalized groups.\textsuperscript{132}

Norfund is however addressing inabilities and lack of opportunities in their operations, but this is only related to discrimination of women and indigenous people when relevant. Women’s capabilities to participate in working life are facilitated by enabling compensating mechanisms or materials. As the Norfund informant explained, in order to increase the development effect of the investments, water and sanitation facilities have been amended in some companies to ensure accessibility for women to the workplace. Despite the fact that such amendments may enable accessibility for other groups, e.g. persons with disabilities, universal design of the sanitation facilities was considered more challenging to provide for in the investment process. This understanding is not coherent with the IFC standards that points to the importance of ensuring that facilities “should be designed and built taking into account the needs of disabled persons”\textsuperscript{133}. Addressing accessibility for persons with disabilities in the risk

\textsuperscript{130} Norfund, Annual Report 2015
\textsuperscript{131} Norfund, interview, NF 1, March 2017
\textsuperscript{132} UNGP, 1, B. Commentary page 5
\textsuperscript{133} IFC Performance Standards.
assessments would therefore be fully in line with the IFC and UNGP that already guide Norfund’s operations. The IFC standards states further that in order to ensure inclusion of “vulnerable groups”, a company must thus take “differentiated measures” to ensure these groups are not disadvantaged in “sharing development benefits and opportunities”134. Broaden due diligence in the area of discrimination of marginalized groups would thus not add new standards to Norfund’s procedures or push Norfund to promote new and more extensive standards, but merely follow up existing duties.

5.1.1.2. Active ownership for inclusive development?

The ambition of Norfund is to expand its role as an active, strategic minority investor that through its active ownership will “establish sound corporate governance and set high standards”.135 Norfund explains how it intends to become an active owner in its strategy as holding the ability to be proactive in meeting challenges and opportunities and understand risks. As the SDGs are globally agreed tool to meet the shared challenge of inequalities and lack of opportunities for some groups, it was appropriate to ask Norfund how the ownership strategy is understood. Norfund is actively promoting inclusion and accessibility when it comes to gender equality, but did not see its role in promoting equal opportunities for marginalized groups and thus complying to the whole set of FIC standards. The use of board representation was not seen as an arena for promoting inclusive development, but rather contribute to specific knowledge the companies were in need of. Non-discrimination is not considered such a competences that the companies were in need of.136

Norfund has not investigated whether merely expecting companies that Norfund invest in to comply with human rights standards is coherent with the ambition of being an active investor that carry out solid risk management.137

Norfund states in its investment policy document that “design and implementation of policies promoting inclusive growth is key for governments seeking to reduce poverty”.138 Norfund recognizes this shift in the strategic approach to global development which also include busi-

134 IFC Performance Standards. P. 4, footnote 18
135 Norfund Strategy 2016-2020
136 Norfund, interview, NF 1, March 2017
137 Nordic Consulting Group, 2016
138 Norfund, Investing for Development, 2015
ness stakeholders.\textsuperscript{139} It is however hard to discover how Norfund see their role in this global shift. Despite the link to the SDGs in the strategy, the fundamental principles of inclusiveness of the SDGs is consistently framing the new strategy, but rather envisage how some of the investments relate to two of the SDGs.\textsuperscript{140} None of Norfund’s publications discuss the concept of inclusive growth and “leaving no one behind” with the aim of defining is or describe how the investments were linked to the development policy and the SDGs. The question to the Norfund informant was thus how they had planned to ensure the investments would feed into the overall goal of inclusive development. The informant confirmed this was a challenging commitment, as it was often demanding to upholding very ambitious social standards for companies in which Norfund invests.\textsuperscript{141} Too many conditions on the companies might also affect the competition with other investors, including the Chinese. It was pointed to the example of Statkraft that “export” very high social standards, which are expensive to uphold in a developing country. This statement contrasted starkly with the experiences from Norwegian companies that invest in developing countries without any financial support from Norwegian government funds. One Norwegian company, TRK Consulting AS strongly contested this argument and the Director of this company was of the opinion that the Ethiopian Government welcomed their investments because of their responsible business strategy.\textsuperscript{142}

Towards the end of the interview, the Norfund informant reflected on the possibilities for investigating what might be feasible within their scope of operation.\textsuperscript{143} The informant further suggested some sectors, including financial services that might hold opportunities for disability inclusion. The informant however called for a practical approach to what is feasible for piloting inclusive practises.\textsuperscript{144}

5.1.2. Norad managed PSD funding mechanisms

The grant scheme rules, developed by Norad and approved by the MFA, guide Norad in the funding process. There is no mentioning of the overarching principle of inclusive development in these rules. Nor do the rules request promotion of inclusion of marginalized groups

\textsuperscript{139} Ibid.
\textsuperscript{140} The Energy Sector may be considered an exemption, as this programme explicitly aims to feed into the goal on universal access to energy.
\textsuperscript{141} Norfund, interview, NF 1, March 2017
\textsuperscript{142} TRK Group AS, interview with GM, April 2017
\textsuperscript{143} Norfund, interview, NF 1, March 2017
\textsuperscript{144} Norfund, interview, NF 1, March 2017
despite other funding schemes refer to these groups\textsuperscript{145}. The grant applicants are requested to develop risk analyses, which include assessing the intervention in relation to the four cross-cutting policy areas; anti-corruption mitigation measures, women’s rights and equality, environmental risks and human rights. Further, the applicants are expected to act in accordance with the UN Guiding Principles on Business and Human Rights, and with the OECD Guidelines for Corporate Responsibility. Norad provide no explanation however, what “most important” non-financial risks may entail and how such risks should be avoided - including the risk of discrimination.

Elimination of discrimination is one of the \textit{minimum standards} set out in the ILO’s core conventions.\textsuperscript{146} Norad application forms and guidelines do not refer to the minimum standards although these would be particularly relevant for grant schemes that have job creation and employment as their main goal. According to one of the informants in Norad, they were of the opinion that the applicants and grant receiving companies should familiarize themselves with the human rights principles and standards including the possible risk of discriminate marginalized groups.\textsuperscript{147} Providing further guidance on issues related to human rights were expressed to be a principle of available recourses. NORAD had, according to one of the informants, not adequate capacity to unpack the UN Guiding Principles or other standards.\textsuperscript{148} Rather, by signing a contract of funding with NORAD, the companies have committed themselves to ensure the standards are understood and followed. It was commented that the companies that sought funding for investing in business in developing countries, often had a moral rational and a wish to “do good” by investing in these contexts, and was thus better equipped to behave responsible.\textsuperscript{149}

The aim of these grants is to function as “catalytic” in the sense that the business initiative will triggers investments from other private sources and in this way create long-term investments and jobs\textsuperscript{150}. One of the informants in Norad pointed to the fact that 2/3 of the funding were grants for feasibility studies in early phases of the assessments.\textsuperscript{151} Thus, this informant

\textsuperscript{145} Marginalized groups are explicitly included in guidelines, application- and reporting templates for CSO-funding mechanisms.
\textsuperscript{146} Norwegian MFA, Meld. St. 10 (2014–2015) Opportunities for All: Human Rights in Norway’s Foreign Policy and Development Cooperation
\textsuperscript{147} Interviews with Norad, NOR 2, March 2017
\textsuperscript{148} Interviews with Norad, NOR 2, March 2017
\textsuperscript{149} Interviews with Norad, NOR 2, March 2017
\textsuperscript{150} Norad, Grant Scheme Rules, Enterprise development for Jobs, September, 2016
\textsuperscript{151} Interviews with Norad, NOR 2, March 2017
was of the opinion that assessment of possible risks connected to discrimination or inclusion of marginalized groups were not appropriate in this early phase of investments.\textsuperscript{152}

The informants in Norad were asked if they could consider promotion of inclusion of marginalized groups as a catalytic effect for increased development impact. One of the informants was however of the opinion that the “catalytic effect” at no means could be related to inclusive work and that providing support for more inclusive approaches would impact the investments.\textsuperscript{153} The catalytic effect is thus understood purely of an economic nature, although including marginalized people in the economy might as UNDP suggests; accelerate fairness of the growth processes which could also be considered \textit{catalytic}.\textsuperscript{154}

According to the PSD policies, promotion of women’s participation is one of the fundamental conditions for triggering funding. Women’s inclusion is not only a matter of justice or fairness, but it has also socioeconomic effects. This is how the Government justify inclusion of women in the PSD initiatives. In other words, including women have catalytic effects as it promote the rights of women and contribute to inclusive development and growth. The informants did not agree to a transferable justification for including marginalized groups as catalyst for inclusive development.

Despite the fact that the concept of inclusive development is a recognized principle with the SDGs, the notion of inclusion has not trickled down to all the funding mechanisms within the scope of development cooperation. One of the interviews were carried out with an informant in Norad’s Section for Research, Innovation and Higher Education. This section manage funding through Innovation Norway and the Norwegian Research Council.\textsuperscript{155} This informant explained that the notion of inclusive development is very “new” and it was not promoted or explained within the agency.\textsuperscript{156} At the time of writing of the thesis, there was a call for application for the new program for innovative solutions within the health- and education sectors. Innovative solutions may accelerate inclusion of marginalized groups, e.g. persons with sensory impairments. Innovative ways of using e.g. computer technology in education settings hold potentials for increased learning outcome for persons with disabilities and may thus con-

\textsuperscript{152} Interviews with Norad, NOR 2, March 2017
\textsuperscript{153} Interviews with Norad, NOR 2, March 2017
\textsuperscript{155} These funding schemes are not funded over the same budget line as Norfund and Norad PSD programs, but administered by Norad.
\textsuperscript{156} Interview with Norad, NOR 4, February 2017
tribute to inclusion in education. My intention was thus to find evidence how they prepared the funding mechanisms in a way that might ensure inclusive outcome. There had been several internal discussion on the issue of inclusion according to the informant. It was however a broad understanding, the informant said, that poor people in general and poor girls in particular were the most marginalized and those in need of particular attention and inclusive practices.\(^{157}\) Norad was asked in the interview if persons with disabilities were considered to belong to the group of marginalized, e.g. girls with disabilities. The informant explained that this was not completely clear, and could be relevant in some projects. The most common understanding was that the focus should be on girls as a particular marginalized group in need of inclusive practises. The informant further explained that political guidance and awareness raising would be important if disability inclusion should be considered in the projects and would guide how results were measured.\(^{158}\)

The Letter of Commitments from Norad to Innovation Norway emphasise that projects aimed at reaching people from marginalized groups should be given priority.\(^{159}\) Norad do however not explained who those marginalized groups are, with girls as the only exception.\(^{160}\) The informant in Innovation Norway explained that this Letter of Commitment guided the assessments of applications from companies. Innovation Norway has developed a system of credits based on number of priority targets included e.g. girls or children from marginalized groups or communities. The informants explained that Innovation Norway was in a position to develop this credit based assessments according to their own responsible business policy.\(^{161}\) Norad do however not assess applications in a similar way. Rather, one of the informants in Norad suggest that adding conditions of including beneficiaries from marginalized groups would obstruct some companies from applying for funding.\(^{162}\)

\(^{157}\) Interviews with Norad, NOR 4, February 2017

\(^{158}\) Interviews with Norad, NOR 4, February 2017

\(^{159}\) Letter of Commitment from Norad to Innovation Norway, 26 November 2016

\(^{160}\) Letter of Commitment from Norad to Innovation Norway, 26 November 2016

\(^{161}\) Interview with Innovation Norway, IN 8, March 2017

\(^{162}\) Interview with Norad, NOR 5, February, 2017
5.2. Obstacles and opportunities for inclusive private sector development programs

Drawing on normative human rights standards, governments have to ask how the most marginalized groups may access productive assets, capacitases and resources that will enable every person to participate in the development and growth process.\textsuperscript{163} Based on the findings and discussions with the informants, I will point to some key elements that obstructs such participation. Further, I will discuss some possibilities that came up in interviews with the informants.

5.2.1. Guiding and promoting inclusion in companies risk management

According to the Norwegian Government white paper on human rights in development cooperation, the government aims to “take steps to provide businesses with necessary information regarding international guidelines and the local human rights situation, and will advise companies operating in challenging markets”.\textsuperscript{164} The OECD National Contact Point (NCP) organizes thematic workshops on relevant topics, including due diligence procedures. The knowledge and contribution from the Norwegian NCP is highly valued by all informants interviewed for this study.

Norad’s criteria document stresses that human rights should in particular be considered in relation to participation, accountability and non-discrimination.\textsuperscript{165} A similar instruction is included in the Letter of Commitment from Norad to Innovation Norway.\textsuperscript{166} One of the informants in Norad explained that Norwegian companies applying for Norad funding are encouraged, on a voluntary basis, to seek information from the OECD National Contact Point on human rights related topics.\textsuperscript{167} Norad do however not take any other initiative to explain how non-discrimination and participation should be addressed in the projects. The informant explained that Norad expects that grant applicants/recipients conduct their business activities in line with the UN GP and OECD guidelines and thus be responsible for interpreting the notion of inclusion and how to mitigate discrimination of marginalized groups.\textsuperscript{168} The grant application template merely require that applicants should “assess and describe risk factors that may

\textsuperscript{163} Asia Development Bank, 2009
\textsuperscript{164} Meld. St. 10 (2014-2015) Opportunities for All: Human Rights in Norway’s Foreign Policy and Development Cooperation
\textsuperscript{165} Ibid.
\textsuperscript{166} Letter of Commitment from Norad to Innovation Norway, 26 November 2016
\textsuperscript{167} Interview with Norad, NOR 2, March, 2017
\textsuperscript{168} Interview with Norad, NOR 2, March, 2017
have a negative impact on human rights, gender relations or the environment” without further explanations.169

One of the Norad informants was of the opinion that Norad was unable to advice the companies in human rights and responsible business conduct due to limited capacity.170 This informant was further of the opinion that it might be too challenging for the small and medium sized companies, to ensure that they operate in line with all human rights norms and standards. The grant criteria however, points out that Norad as the manager of the funding scheme, is responsible for assessing if the grant recipients risk-assessments and risk-management related to the cross-cutting issues are sufficient to prevent negative impact i.e. adverse human rights impact.171

In line with the UNGP 7, the Norwegian policy emphasised a need to support and “intensify the effort” to provide guidance to private sector on human rights.172 So far, realization of this ambition is pending. On the contrary, Norad had their budgets for PSD considerably reduced in 2015, and also had to reduce its number of staff. The budget cuts further lead to closing of the Norad funded office that provided guidance for private companies applying for grants.173

Synthesising the information obtained in the semi-structured interviews with the various stakeholders in MFA, Norfund, Norad and Innovation Norway, I found there was no clearly formulated procedure how to assess and mitigate the risk of non-discrimination. Norad, Norfund and Norwegian Embassies receive no clear instruction from the Ministry of Foreign Affairs that propose an operational approach to inclusion of the most marginalized groups. The grant managers respond to what is explicitly included in the letter of commitments from the MFA e.g. including the risk of discrimination due to gender. Norad and Norfund have thus not initiated procedures to explore how marginalized groups, including persons with disabilities are differently affected in the risk analyses.

Two of the informants were of the opinion that the companies should not be burdened with all-embracing regulations that did not fit the purpose of the investments and initiatives.174 Discrimination of persons with disabilities is thus not considered included in the category of

169 Norad, Application form: Enterprise Development for Jobs, para 4.2.
170 Interview with Norad, NOR 2, March, 2017
171 Norad, Grant Scheme Rules, Enterprise development for Jobs, September, 2016
173 The counselling office for private companies (Veiledningskontoret for næringslivet) closed in early 2017 due to funding constraints.
174 Interviews with Norad, NOR 2 and NOR 5, Feb and March 2017
“most salient risks” for business that is should be included in the risk management systems. As mentioned in chapter 5.1.2. Norad’s support to feasibility studies are of a nature that do not always result in long-term business commitments. One of the informants in Norad was thus of the opinion that very comprehensive analyses might not serve the purpose is reasonable.\textsuperscript{175} At the same time, Norad has staff of profound knowledge of human rights risks assessments, and one informant suggested a more systematic approach in utilizing this in-house capacity.\textsuperscript{176}

5.2.1.1. Opportunity for coherent guidance of non-discrimination by grant recipients

An opportunity that was pointed out by the informant in the MFA, was to develop the cooperation between the OECD NCP, Norfund, Norad and other stakeholders. Increased coordination and coherent guidance of business represents an opportunity to unpack the principles of inclusion and non-discrimination of marginalized groups.\textsuperscript{177} A preliminary meeting between the stakeholders has been organized once, but this policy ambition has not been explored further. A mandatory training for grant recipients on how to ensure inclusive business operations was suggested by one of the informants.\textsuperscript{178} A coordinated and mandatory service could also promote more specific guidelines developed which are aimed to mitigate risks of discrimination of persons with disabilities.\textsuperscript{179}

Mitigating risk of discriminating persons with disabilities is about removing barriers linked to awareness and attitudes. One of my questions for Norfund was how they see the possibilities for promoting inclusion of marginalized groups as a tool for behaviour change in the investing companies. The informant suggested looking into if additional funds could be channelled to the companies in the South, for promoting employment of persons with disabilities.\textsuperscript{180} The informant was of the opinion that lessons could be drawn from experiences with the NHO Female Future project which is a scheme for promoting gender equality and women’s rights. The Female Future project aims to promote women’s access and participation and is now in-

\textsuperscript{175} Interview with Norad, Nor 2, March 2017
\textsuperscript{176} Interview with Norad, Nor 3, March 2017
\textsuperscript{177} Interview with MFA, MFA 6, February 2017
\textsuperscript{178} Interview with Norad, Nor 3, March 2017
\textsuperscript{179} E.g. Global Reporting Initiative’s Disability in Sustainability Reporting (2015) and UN Global Compact Draft Guide for Business on the Rights of Persons with Disabilities (2017) as well as the principles of the SDGs and CRPD.
\textsuperscript{180} Interview with Norfund, NF 1, February 2017
cluded in Norfund’s activities. A similar structure could be worth investigating further and worth considering.\textsuperscript{181}

### 5.2.2. Reporting procedures

According to the Shift project, “what get measured gets managed”.\textsuperscript{182} Disability inclusion will not get “managed” in operations unless disability inclusion is measured in development planning and reporting.

Norfund’s expected development outcome is described as “profitable, well-run and responsible companies”.\textsuperscript{183} Reporting on development effects in a reporting system is aligned with the best-practice approach developed by the IFI Working Group on Indicator Harmonisation and the Global Reporting Initiative (GRI) on international developed reporting standards.\textsuperscript{184}

Norfund is concerned with not to require too extensive reporting requirements from the companies, and have thus selected a few easily measurable indicators.\textsuperscript{185} Within the category of employment, the elected indicators measure number of jobs by three categories – disaggregated by gender. With the use of gender disaggregated indicators, Norfund is able to monitor number of women who access jobs, loans and banking services as part of the wider impact of the investments.

When governments partner with business for SDGs, there is little evidence from literature studied nor the interviews with Norfund and Norad that the discourse on business and sustainable development include the core principle of inclusive development. The Agenda 2030 encourage measuring progress of all 17 goals disaggregated by age, sex, disability and geography.\textsuperscript{186} The Global Reporting Initiative (GRI) as well as the Global Compact have developed disability specific reporting manuals for business and governments.\textsuperscript{187} Despite this development, Norfund has not amended its reporting procedures or set of indicators. Nor were any of the informant in Norfund and Norad aware of the disability specific reporting manuals.

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\textsuperscript{181} Interview with Norfund, NF 1, February 2017


\textsuperscript{183} Norfund, How Norfund Measure Development Effects. www.norfund.no Accessed 10 April 2017

\textsuperscript{184} GRI is an international independent organization that helps businesses, governments and other organizations understand and communicate the impact of business on critical sustainability issues such as climate change, human rights, corruption and many others

\textsuperscript{185} Ibid.

\textsuperscript{186} UN Statistical Commission, E/CN.3/2017/2

\textsuperscript{187} GRI is an international independent organization that helps businesses, governments and other organizations understand and communicate the impact of business on critical sustainability issues including human rights. https://www.globalreporting.org
The Shift Project stresses that progress is rarely about perfection – human rights reporting is not about reporting on complete success only, but should also reflect the complexity.\textsuperscript{188} Despite imperfect national data on disability, Norfund could explore the opportunity to add disability (as suggested in the SDGs) as a variable for the employment indicators.

For the “Enterprise development for jobs” funding scheme, one of the informants in Norad explained that the grant recipients did not report on development effect due to the short term nature of the grant-supported activities.\textsuperscript{189} The grants are allocated to companies in an early phase of investments and for performing feasibility studies. Expecting inclusion of persons with disabilities was thus beyond the scope and not a realistic expectation of these programs.

A similar concern was raised in a recent evaluation of development effect of Norfund and the other Nordic Development Finance Institutions. “Demanding wider responsibility for developmental impacts could risk its efficiency and complicate balancing between differing, partly contradictory goals”.\textsuperscript{190} This evaluation suggests however, that more could be done by Norfund to hold the investment companies accountable to create a broader impact on society level.\textsuperscript{191} The Shift project suggests that initiatives for measuring human rights issues in business activities should rather be recognized and rewarded.\textsuperscript{192} This way of promoting minority rights was also suggested by one of the informants in Norad.\textsuperscript{193}

Non-discrimination is however complex and challenging to measure, in particular when related to disability. Disability is a multidimensional experience and poses several challenges for measurement.\textsuperscript{194} The WHO’s World Report on Disability addresses this challenge, including the lack of globally agreed methods for measuring the number of persons with disabilities. This may also be challenging for planners when they are developing inclusive programs and interventions. Quantitative methods for measuring SDG progress and inclusion of marginalized groups will rely on accessible national data if the achievements are to be aggregated by disability. As long as disability is not always defined according to the CRPD definition, surveys on disability prevalence and thus participation in employment and education have re-

\begin{itemize}
\item \textsuperscript{188} Shift, Business and Sustainable Development Commission, \textit{Business Human Rights and Sustainable Development Goals – Forging a Coherent Vision and Strategy}, 2016
\item \textsuperscript{189} Interview with Norad, Nor 2, March 2017
\item \textsuperscript{190} Norad, Evaluation of the Norwegian Investment Fund for Developing Countries (Norfund), Gaia Consulting, 2015
\item \textsuperscript{191} Norad, Evaluation of the Norwegian Investment Fund for Developing Countries (Norfund), Gaia Consulting, 2015, p. 24
\item \textsuperscript{192} Shift, Business and Sustainable Development Commission, \textit{Business Human Rights and Sustainable Development Goals – Forging a Coherent Vision and Strategy}, 2016
\item \textsuperscript{193} Interview with Norad, Nor 5, February 2017
\item \textsuperscript{194} WHO, Global Disability Report, 2011
\end{itemize}
viled large discrepancies in different countries and communities.\textsuperscript{195} The Shift project, suggests that governments must move beyond assumptions that the most valuable way of assessing progress in respect to human rights is through quantitative data.\textsuperscript{196} Inadequate quantitative data on disability is still what might be a starting point for measuring disability inclusion until better internationally agreed indicators and tools are developed.

5.2.2.1. Opportunities for reporting on disability inclusion in private sector development projects

Norfund is already collecting gender disaggregated data when reporting on employment and access to financial services. Adding disability in the Norfund indicator set, would not demand a completely new reporting system, but could be linked to the SDG target 8.5, which guide Norway’s development policy. This had however not been considered by Norfund, but would comply with the expected outcome of the microfinance programs and the opportunities Norfund suggested during the interview.

The Investment Fund for Industrial Investments (IFU) is the Danish government owned investments arm with a similar scope and mandate as Norfund.\textsuperscript{197} IFU uses most of the same indicators as Norfund, with the exception that the indicators on employment are also disaggregated by youth employment as well as gender.

Norad grant recipients will have to report on gender disaggregated jobs created as effect of the intervention under the grant scheme “Enterprise development of jobs”. Norad might also investigate if age and disability could be added in the template, as reporting will have to relate to the project plan. A report will usually be silent about what is not included in the planning.

5.3. Final discussion and summery of findings

The SDGs are recognised in policy documents and by the informants in Norfund and Norad. Still, the policies do not provide a clear definition of inclusive and sustainable development. Nor do the policy guidelines and regulations provide guidance to grant managers and applicants how to ensure inclusiveness in operations. While some of the informants were of the opinion that there were no awareness of what inclusive development entails, others suggested

\begin{footnotesize}
\textsuperscript{197} IFU Investment Fund for Developing Countries: https://www.ifu.dk/en/frontpage-english/ Accessed 27 April, 2017
\end{footnotesize}
that the programs were inclusive per se, as they were contributing to job creation and economic development.198

Further, some of the informants expressed an assumption that the private sector development programs contribute to inclusive development as long as the programs benefit “poor people” and promoted women’s access and participation. “Leaving no one behind” were thus interpreted by some informants as a result from trickling-down processes or programs had to particularly designed for targeting marginalized groups. Disability inclusion was either not considered a priority topic for inclusion, not relevant for these types of programs and should rather be referred to other programs (e.g. vocational training) while some informants indicated limited awareness of the policy commitment for disability inclusion.

Even though some of the informants recognized the rights of persons with disabilities being a target group in Norwegian human rights policy, they were of the opinion that the topic had to be promoted actively at a political level in order to trickle down in the organization.

As expressed by several of the informants, there are many immediate policy priorities in Norway’s development cooperation policies and thus many demands on Norad and Norfund staff. Inclusion of marginalized groups like people with disabilities were considered complicated by the informants. It was noted by several that disability was best cared for by targeted interventions rather than placing unrealistic demands on the often small companies Norad and Norfund relate to. The most striking funding was however that disability was not regarded as a human rights issue that should be considered a demand to respect or protect in the investments and projects for private sector development. It was also striking that there have been no attempt to interpret the notion of inclusive development. Despite inclusive development and leaving no one behind being the core principles of the SDGs, the link between this policy commitment and investments in private companies was still not considered relevant.

Despite acknowledging the authority of the UN Guiding Principles, the informants who administered the funding schemes had limited awareness of the what these on the were not regulatory adjustments that could have contributed to increased inclusiveness, e.g. risk management, coherent and strategic guidance of companies and revised indicators and reporting systems, have not been considered.

198 Interview with Norfund, NF 1, February 2017
The informants were rather of the opinion that targeted initiatives with additional funding similar to the “Female Future” programme, might hold some potentials for promoting the rights and inclusion of persons with disabilities.

In the 2016-2020 action plan on women’s rights and gender equality, economic empowerment of women aims at “reaching those furthers behind first” including women who experience multiple discrimination e.g. women with disabilities. The informants had not reflected on, or prepared for, implementation of this policy commitment nor given any further instructions to do so.199

The interviews with the OECD National Contact Point, GIEK, MFA and Norad’s resource persons on business and human rights, added value to the discussion. It was a coherent understanding that companies as well as grant managers would benefit from unpacking the rights of marginalized groups and how to promote inclusive development in operations. Further, this group of informants were also coherent in their call for a stronger political commitment in operationalize inclusive development in private sector development programs. At the same time, there was a coinciding opinion with the grant managers that companies struggle to understand basic principles for responsible business conduct. They expressed a concern that by adding requirements for disability inclusion would not benefit marginalized groups without supporting the requirements with sound guidance and support. At the moment, the government institutions are not resourced to accommodate for the such support for all grant managers, nor is support provided by the OECD NCPA mandatory for grant recipients.

The PSD programs do not apply a systematic approach to ensure inclusion of persons from marginalized group. Rather, there are no evidence that these programs provide support mechanisms that could mitigate risks of upholding barriers for inclusive employment initiatives or inclusive financial services.

The findings suggested a general interpretation of inclusive development as a growth strategy that might trickle down to the most marginalized groups. This contrasts the approaches developed by Sen and Nussbaum that governments must ensure resources to accommodate participation and access by the most disadvantaged groups, including persons with disabilities.

The findings suggests that PSD programs are differently equipped to address inclusive practices due to what is feasible when it comes to opportunities for marginalized groups including

199 Norwegian MFA, Action Plan for Women’s Rights and Gender Equality in Foreign and Development Policy 2016-2020
persons with disabilities. Norway’s contribution to clean energy will impact at national level and therefore an indirect development effect. The pattern of access to national sources of energy is an issue of redistributive policies and a responsibility of the national and local government rather than the investor. However, programs aiming for direct development effect, including employment and financial services, could benefit the most marginalized groups and decreasing deprivation of opportunities. Norfund and Norad could in such interventions use their influence by explaining how discrimination of marginalized groups could be mitigated by sound human rights risk management.

6. **Sub-question - What can we learn from empirical examples on inclusive employment in private sector?**

6.1. **Business engagement for inclusive development**

The 2030 Agenda emphasizes the need for states and development agencies to collaborate with business in order to reach the 17 SDGs. The international community has thus encouraged business to engage in the 2030 Agenda, and the business community has responded to this call. Some companies in the international business community have embraced the idea that business may contribute to inclusive development by their investments and business activities. In light of this enthusiasm for the SDGs, Professor John Ruggie, is reminding companies to make sure that respect for human rights must be recognized as the starting point for all companies in engaging with the SDGs and integral to how to measure success. The Shift project actually encourage business to find innovative approaches to responsible business beyond “do no harm” to make sure the most marginalized people to enjoy the fruits of development. Still, Norfund and Norad are reluctant to promote the most urgent human rights principle of the SDGs when engaging with private sector; leave no one behind.

On this backdrop, it is useful to investigate why and how some companies have embraced diversity as a business value, and developed disability inclusive approaches as an integral part

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201 Professor John Ruggie, Open letter to the Global Commission on Business and Sustainable Development, 16 February, 2016
of their responsible business strategies. These companies are also realizing that fostering diversity that includes the world’s one billion persons with disabilities among employees, customers and suppliers can provide a competitive advantage. According to the International Labour Organization (ILO), by including persons with disabilities, businesses improve their reputation both on the national and international level as they show that they live up to their responsibilities and values and promote human rights. If this is the case, what can Norway’s PSD learn from such companies of a rights issue that should be state promoted? As explained by Norad in the interview, the companies that seek government funding are all committed to add social value through their activities and are “doing good” per se.

One global actor that has contributed greatly to advance disability inclusive employment in the private sector is ILO. The ILO Global Business and Disability Network (GBDN) is a worldwide network of multinational companies, national employers’ organizations, business networks and disabled people’s organizations (DPOs). Since 2010, the GBDN has been working in collaboration to promote disability inclusion in the workplace. The International Labour Organization (ILO) facilitates the network, provides technical expertise to its members and directly supports its activities through a secretariat, based in the ILO headquarters in Geneva, Switzerland.

A sub question of this thesis is therefore: What can be learned from the business community on disability inclusive practices that may have relevance for the government funded PRD programs.

The sub-question is addressed by exploring “why” as well as “how” businesses engage in inclusive business models. What motivates a company to provide opportunities for persons with disabilities is relevant for the possible value of learning and adaptation in the Norwegian Government funded job creation programs. I was in particular interested to know if the SDGs and human rights law had influenced their commitment to employ persons with disabilities.

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203 Global Compact, Draft guide for business on the rights of people with disability for global consultations, 2017
205 Interview with Norad, 2017
6.2. Case illustrations on disability inclusive employment

6.2.1. Telenor Open Mind

Telenor Group has worked strategically to train and employ persons with disabilities since 1996 with the Open Mind program.²⁰⁸ Telenor Open Mind is a two-year internship program for persons with disabilities and runs as a permanent department in Telenor in Norway. The Open Mind program has four permanent staff members in Norway. The program select annually ten interns with disabilities who receive coaching and mentoring. About 50% are offered jobs in with Telenor or other companies after completion of the training. As of 2017, the training program is fully funded by Telenor Group and the cost for one year of training is NOK 90,000 for each of the ten participants.²⁰⁹ The candidates for the training are elected to the program based on interviews, and must as a minimum, hold a Bachelor degree.

Telenor Open Mind projects are established in Pakistan and India as well as in Sweden and Bulgaria. In Malaysia, an Open Mind project ran for two years from 2008 to 2010. By 2015, 375 people with disabilities are inducted through the programme globally. According to Telenor’s Annual Report 2015, the ambition of Telenor is to launch the Telenor Open Mind program to all Telenor markets by the end of 2019.²¹⁰ The programs are included in the sustainability report of annual report, as a part of their initiatives for gender balance and diversity.²¹¹ Telenor is a member of the ILO Global Business and Disability Network.

The informant in Telenor Open Mind was of the opinion that they do not favour Government regulations that “force” including employers with disabilities.²¹² Rather, Telenor Open Mind favour encouragement, inspiration and support as keys for success to disability inclusion. Open Mind Norway has worked to stimulate awareness and illustrate best practise rather than to impose a duty on the global operations – in Norway as well as in other countries of operation.²¹³

²⁰⁸ Interviews with representatives from Telenor Open Mind in Oslo, March 2017
²⁰⁹ The annual training was previously financially co-funded by NAV.
²¹⁰ Telenor Annual Report 2015, p. 26
²¹¹ Telenor Annual Report 2105, p. 52
²¹² Interviews with Telenor Open Mind in Oslo, OM 11, March 2017
²¹³ Interviews with Telenor Open Mind in Oslo, OM 11, March 2017
Telenor Open Mind Pakistan has been operating since 2013, and is known as Khuddar Pakistan. Pakistan has ratified the CRPD and other core human rights treaties. A disability and employment Act is drafted but has been pending in the Parliament for more than fifteen years. Khuddar Pakistan was introduced as a CSR initiative, but from 2015 handed over to the Human Capital Division at policy level as a regular recruitment feature and the training is conducted in a similar manner as by OM Norway. Sixteen selected participants are annually given a three month course with functional and on the job training at the National Institute of Special Education, and after that an internship or placement in the organisation or a partner organisation for another 9 months. The Khuddar Pakistan has established a network of cooperating companies, to increase the possibilities of the participants being employed after they have ended their training. The informant from Khuddar Pakistan pointed to the importance of engaging with the government in order to give credibility to the program as well as it contributes to awareness on disability inclusion in other private and public organisations. Sixty-four persons with disabilities have so far followed the program to the total cost of 40 million PKR (appr. NOK 3.3 million).

6.2.1.2. Findings and learning from Telenor Open Mind

Telenor Open Mind has contributed greatly to raising disability and diversity awareness within the organisations in Norway and Pakistan. These are also successful in providing opportunities for persons with disabilities to participate in working life in the ICT sector. Open Mind has thus contributed to mitigating barriers related to attitudes and stigma as several of the trainees have been hired and included in Telenor operations and other ICT companies on equal terms with other employees. Telenor has thus successfully contributed to equalizing people with disabilities’ actual level of opportunity for functioning by providing the training. This training has been crucial in both countries for the participant’s opportunity to take part in the society as well as contributing economically. Telenor in Norway and Pakistan is contributing to inclusive development as they are mitigating environmental and attitudal barriers and in line with the capability approach support empowerment and human well-being of the most marginalized.
The programs in Norway as well as in Pakistan are familiar with the SDGs, but these goals have been crucial for allocating resources to the programs. Rather, the economic costs related to the programs, have been allocated due to strong internal diversity policies.216

The informant in Telenor Open Mind points to the need to explain the notion of diversity within the organisation to make it happen. “If the Code of Conduct make diversity a value, this if often understood in terms of gender equality only – not in terms of disability,” the Telenor informant explained.217

6.2.2. L’Oréal – inclusive diversity employment policy

L’Oréal is one of the world largest cosmetic companies, present in 130 countries with more than 80.000 employee globally. “Sharing growth” is the one of the main commitments in L’Oréal sustainability policy in which an “inclusive business model” is the tool for hiring persons with disabilities.218 A Diversity and Inclusion policy is integrated into this business model.219 L’Oréal’s ambition is to become one of the world leaders in management of diversity, and has since 2004 worked strategically to employ people with disabilities and reflect diversity in their global workforce.220 In 2015, L’Oréal’s workforce included 773 people with disabilities. L’Oréal is a member of the ILO GBDN, and has also signed the ILO Network Charter.221 L’Oréal has engaged their subsidiaries in an internal competition for promoting employment of people with disabilities with a Disability Awareness Day for sharing and rewarding best practises around the world. The global goal in each country of operation is to employ 2% persons with disabilities within year 2020. L’Oréal is adapting their strategies to local contexts in order to succeed, and cooperate with NGOs and employment associations to identify qualified persons with disabilities in “match-making” activities. L’Oréal published its first international Diversity Report in 2015.222

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216 Interview with Telenor Open Mind, OM 11, March 2017
217 Interview with Telenor Open Mind, OM 11, March 2017
219 This section is based on interview with representative from L’Oréal Paris conducted in April 2017 and information from L’Oréal’s diversity reporting at [www.diversityreport.loreal.com](http://www.diversityreport.loreal.com) accessed 17 April 2017
220 L’Oréal CEO Statement on Diversity: [http://www.loreal.com/group/diversity](http://www.loreal.com/group/diversity) Accessed 17 April, 2017
222 L’Oréal Diversity Report ([www.diversityreport.loreal.com](http://www.diversityreport.loreal.com)) Accessed 17 April, 2017
The informant explains that there is a very strong commitment at the Headquarters in France to engage in disability inclusion with a “strong diversity and inclusion policy”. In France, a Disability Act makes it a duty of national companies with more than 20 employees to ensure 6% of the company’s workforce has to constitute persons with disabilities. The informant referred to how the legal development within disability and employment rights have guided L’Oréal’s global ambition on disability inclusion.

L’Oréal is very much concerned that the recruitment process is not about meeting a quota, or hire staff because of their disability. Rather they were looking for certain qualifications that made the person fit for the job and that reflect the whole spectre of diversity within the global marked. Hiring persons with disabilities without meeting certain criteria would rather enforce the stereotypes, the representative explained. In order to find those fit for the jobs, they were very much dependent on local networks to help L’Oréal tapping into the “disability labour pool”.

L’Oréal started to use the word “inclusion” in their diversity policy in 2016. “We want to do inclusion without having separate programs, but we struggle with the definition. We must discuss what inclusion really mean – we are in the process of doing this now” explained the L’Oréal informant. L’Oréal has no particular budget for possible costs related to including persons with disabilities in the workforce. Rather, the informant emphasised that disability inclusion is a matter of attitudal barriers than a financial obstacle.

6.2.2.1. Findings and learning from L’Oréal’s diversity policy

Similar to Telenor Open Mind, L’Oréal has invested a lot of effort in developing a business culture of diversity and inclusion. As a multi-national company, L’Oréal has also engaged companies in their supply-chain in countries of operations in employment of persons with disabilities. Unlike Telenor, L’Oréal is of the opinion that success depends on integrating disability inclusive employment in the organization’s hiring policy without having particular programs for certain groups.

223 Interview with L’Oréal, LO 12, March 2017
224 Interview with L’Oréal, LO 12, March 2017
225 Interview with L’Oréal, LO 12, March 2017
226 Interview with L’Oréal, LO 12, March 2017
227 Interview with L’Oréal, LO 12, March 2017
228 Interview with L’Oréal, LO 12, March 2017
L’Oréal is mindful of the challenges to reach their 2020 goal, including the need for good partners, unpacking the notion of inclusion as well as the challenge of cultural differences in defining disability. The company has however high awareness on these issues and are working to overcome it, including how to monitor disability in order to report performance according to their target.  

Online accessible information from regional operations indicates that gender and ethnic diversity has a higher focus than disability inclusion. Still, disability as a diversity issue has a high awareness at Headquarters level. L’Oréal further draws on experiences within the GBDN to gain more understanding of the notion of disability inclusion.

6.2.3. Ripples in Water - NHO

*Ripples in the Water* (RIW) is a recruitment strategy for member companies of the Norwegian Employer Association, NHO. The aim of the strategy is to connect members companies to people who have been out of work for a lengthy period often due to psychosocial and physical challenges. The method is based on the recognition that most people are willing as well as able to work if given the opportunity and the right support in a well-matched company. Assessment of the company and their needs for manpower is the point of entry in the RIW methodology. The assessed company is introduced to a job seeker with skills matching the company’s needs. A local point of contact with profound knowledge of the NHO member companies and their needs is liaising closely with a local rehabilitation unit. By 2016, RIW successfully contributed to employment of more than 1.550 people with various capabilities in NHO member companies. RIW has proved effective in contributing to diversity inclusive businesses by supporting companies in employing individuals fit to perform the vacant jobs. Some companies including Kolonial.no and Bypost AS have embraced RIW as a responsible business strategy. These companies promotes the methodology and highlights the success of

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229 Interview with L’Oréal, LO 12, March 2017  
232 Information in this section is based on interview with a representative from Ripples in Water, NHO, Oslo as well as reports and internet sources [https://www.nho.no/Prosjekter-og-programmer/ringer-i-vannet1/](https://www.nho.no/Prosjekter-og-programmer/ringer-i-vannet1/) accessed 12 April 2017.  
233 Interview with Ripples in the Water, NHO, NHO 9, March 2017  
235 Interview with Ripples in the Water, NHO, NHO 9, March 2017
hiring highly motivated individuals and experience sick-leave rates as low as 0.8% annually.\textsuperscript{236} 

NHO has engaged with the SDG agenda at several levels.\textsuperscript{237} NHO signed a Memorandum of Understanding (MoU) with the Norwegian MFA in 2016 with the aim to contribute to job creating and private sector development in developing countries by facilitating public/private partnerships.\textsuperscript{238} The MoU is part of the Government’s strategy for SDG implementation. With the MoU, NHO aim to encourage and facilitate member companies in investigating innovative investments and business opportunities for economic growth and job creation. Cooperation between private companies, NGOs and other relevant stakeholders is encouraged by NHO. So far, there has been no discussions within NHO, Norad, Norfund or MFA how to make use of the RIW experiences in order to investigate opportunities to promote diversity and disability inclusion in this cooperation.\textsuperscript{239}

6.2.3.1. Findings and learning from NHO Ripples in Water

Few of the RIW companies have a sophisticated diversity or responsibility policy. An evaluation report however found that many of the RIW companies are committed, often by top management, to “do good” and foster diversity in the workforce.\textsuperscript{240} By hiring staff through RIW, the companies have not only top motivated staff, they have also received a lot of positive feedback and attention, which contributes to continuous cooperation with RIW.\textsuperscript{241} E.g., Kolonial.no is committed to employ 1/3 of its staff through RIW and in Bypost AS 15 out of 18 employees are hired with assistance from RIW.\textsuperscript{242} The RIW informant is of the opinion that the matchmaking methodology is easily transferrable to other cultural contexts.\textsuperscript{243} As manuals and training material are already developed, the methodology could promote the capabilities of people with all abilities in job creating investments in developing countries.

\textsuperscript{236} Bypost’s experiences with RIW: https://www.youtube.com/watch?v=NqKMUdCvQ0c&t=3s, Accessed
\textsuperscript{237} NHO has organized conferences on the 2030 Agenda and business: https://www.nho.no/ Om-NHO/Arrangementer/naringslivets-konferanse-for-internasjonalisering-og-utvikling-2017/, Accessed 1 May 2017
\textsuperscript{238} MoU between NHO and MFA was signed in November 2016: https://www.nho.no/Politikk-og-analysen/Internasjonalt/ud-og-nho-med- ulandssamarbeid/, Accessed 20 April 2017
\textsuperscript{239} Interview with Ripples in the Water, NHO, NHO 9, March 2017
\textsuperscript{240} Bråthen and Lien, Ripples in the Water, Evaluation report, FAFO, 2015
\textsuperscript{241} Bråthen and Lien, Ripples in the Water, Evaluation report, FAFO, 2015
\textsuperscript{242} Interview with Ripples in the Water, NHO, NHO 9, March 2017
\textsuperscript{243} Interview with Ripples in the Water, NHO, NHO 9, March 2017
6.3. Final Discussion of learning from the business sector

The experiences from the private actors hold several experiences which might be relevant for initiating disability inclusion in Norway’s Private Sector Development initiatives. Despite very different approaches and methods, the companies have succeeded in raising awareness on the issue of disability inclusion and by proactively promoting employment opportunities for persons with disabilities. The rational for engaging in inclusion is formulated differently by the three organizations, the aim is however coherent; finding the right person for doing the right job and contribute to social justice. The organizations assessed were also coherently pointing to the fact that employing persons of all personal characteristics contributed to a positive and more open business culture.

L’Oréal is the company that most clearly communicated a value based rational for disability inclusion as wanting to “do good”, although the companies in all the three cases highlighted inclusion as a moral responsibility with an aim to foster respect for differences. Consistent with the capability approach, all three organizations expressed a responsibility for promoting the individual employee’s well-being by creating enabling environments and opportunities to participate and benefit.

None of the organizations assessed in the cases had tried to define the concept of inclusiveness, although L’Oréal had started to explore the notion of inclusion and how it could be mainstreamed throughout the organization.

This value-based justification for inclusion goes however hand in hand with recognition of the socio-economic benefit of including people with disabilities as participants in the economy. Khuddar Pakistan as well as L’Oréal were clearly stating that disability inclusive business behaviour contributes positively to the local economy as well as business-value when persons with disabilities contribute as consumers and taxpayers. This argument was not highlighted by the organizations in Norway, but was rather referred to as an underlying fact that including all groups in the workforce have clear positive socio-economic effect.

Facilitating inclusion was not considered an unmanageable challenge for any of the organizations assessed, despite the fact that Telenor Open Mind in Norway and Khuddar Pakistan put considerable financial resources in reaching their goals. Rather all organizations recognized challenges with stigma and a need for mitigating barriers related to negative attitudes. Interestingly, a multi-national company like L’Oréal as well as the smaller companies in the Rip-
ples in Water network, pointed to matchmaking and alliance building as crucial elements for successful disability inclusion.

Synthesising the findings and potential for learning from the private sector indicate that the private organizations assessed in these cases are proactively creating opportunities for employing persons with disabilities. Commitment from top management level is crucial in all the cases assessed, and inclusion has to be consciously promoted and encouraged. Rewarding initiatives was recognized and utilized in all of the organizations as this created a sense of proudness among the stakeholders. The findings indicate further that there were no particular gap between the large multi-national companies when it came to commitment and ability to implement disability inclusion. Telenor and L’Oréal and the smaller RIW argued coherently that social responsibility, fairness and business advantage were interacting justifications for including people with disabilities.

7. Final analyses and concluding remarks

7.1. The research question revisited

This thesis aims to illuminate to what extent the Norwegian government’s private sector development initiatives reflects the policy commitments towards inclusive development and human rights duties of non-discrimination of marginalized groups. The thesis focuses on persons with disabilities as a group identified as left behind in the 2030 Agenda and a priority topic in Norway’s international human rights policy. The sub theme addresses the potentials and challenges for including persons with disabilities in programs and investments in the private sector in developing countries. Three cases illustrated how Telenor, L’Oréal and Ripples in the Water/NHO are providing employment opportunities and empowering, persons with disabilities.

7.2. Summing up findings

The empirical analyses illustrates that Norfund and Norad have not investigated the opportunities for including persons with disabilities as a crosscutting human rights issue in the aid funded private sector development initiatives. The findings indicate that grant managers in Norfund and Norad have limited awareness of disability in general and it was not considered a topic of relevance for the PSD interventions. The findings are surprising given the attention to
the global quest of leaving no one behind. Further, the findings suggest that inclusive development is not perceived as an approach that encompasses disability inclusion. Thus discrimination due to disability is not included in the risk analyses which do not address identification and mitigation of barriers for participation where this could be relevant. The findings further indicate that disability inclusion is not addressed in reporting procedures.

Further, the cases indicate that barriers were to a large degree connected to stereotyping disability and lack of awareness. This thesis further aimed to look to the private sector and investigate how some companies have created opportunities for employment of persons with disabilities. The findings are striking; the private companies assessed were placing a lot of effort into employing people with diverse background and abilities. The data shows that the private companies assessed, were taking a more proactive approach in mitigating disability discrimination and creating employment for persons with disabilities. As these companies where chosen due to their inclusive policies, it should be noted that these might not be representative of the larger business community.

The multinational companies assessed in thesis recognized the SDGs, but inclusive employment were practised independent from the call of the 2030 Agenda to work towards the goals.

7.3. The reliability of data

Interviews with representatives in the Norwegian government as well as the business community were the main sources for my analysis. One might reflect if the informants were the ideally positioned representatives to illuminate the questions for this thesis. Further, the bias of the researcher as well as the motivation of the informants could have affected the way questions and answers were presented interpreted. However, I have not find any reason to question the reliability of any of the informants in this study. The findings rather suggest coherent interpretation of inclusive development and disability inclusion among government representatives. Further I found no reason to question the reliability of data gathered from the reports and interviews with business representatives.

7.4. Why is disability not included in PSD interventions

This thesis illustrates that a policy framework like the 2030 Agenda as well as human rights duties are not nearly enough to see their implementation in practise. Although the 2030 Agenda responds to raising inequalities and marginalization with a call for states to ensure inclu-
siveness in development cooperation, the lack of coherent interpretation of the notion of inclusive development is striking. The 2030 Agenda highlights inclusion of persons with disabilities in its preamble as well as in goals and targets. Still the literature assessed for this thesis, as well as responses from the informants, do not propose any clear interpretation of the notion of inclusive development and inclusive growth. This lack of clarity indicates a perception that including women and “the poor” is what makes development inclusive. This lack of clarity of what inclusive development and inclusive growth entails, affects Norway’s private sector development initiatives.

In the Norwegian government funded private sector development initiatives, there are no systematic measures taken to ensure marginalized groups identified in the 2030 Agenda are included in a mainstreamed way. Inclusive development is rather based on the assumption of a ripple effect from private/public cooperation and increased business activities.\textsuperscript{244} The private companies were of quite different opinion; they had systematically promoted the capacities of persons with disabilities and created opportunities for inclusive employment. Instruction to act “is a management responsibility” was the message from the private companies.\textsuperscript{245} There is no such instruction from Norwegian government today for the PSD interventions.

Is it realistic to expect that the PSD interventions should create opportunities for persons with disabilities? This question came up several times during the interviews with informants. Several of the informants indicated that it would be unrealistic and illusive to expect disability inclusion across the PSD program portfolio. Some of the initiatives aim to facilitate rather than enact direct development impact. Providing clean and reliable energy may be a precondition for economic growth and job creation, rather than a sector program where deliverables have direct impact on marginalized people. Such programs may effect wider systemic changes, which will rely on redistribute government policies and thus indirect effect of the most marginalized groups.\textsuperscript{246} Further, not all investments are successful or sustainable, and it should be recognized that some projects have to accept certain risks for failure without guaranteeing development effects.\textsuperscript{247} Still, several of the programs aim at direct impact on poor peoples lives, e.g. access to finance and jobs. As this thesis could not document any initiatives

\textsuperscript{245} Interview with representatives from Telenor Open Mind in Oslo, March 2017
\textsuperscript{246} Teichman, The politics of inclusive development, 2017
\textsuperscript{247} Interviews with Norad, NOR 2, March 2017
taken to define the notion of inclusiveness, the findings indicated unclear perceptions of the scope of expectations and opportunities for applying disability inclusion.

Channelling official development funding through private companies implies taking risks. Despite the guidelines call for assessing risk of discrimination of marginalized groups, these groups were left for applicants to identify. Analysing risk related to discrimination due to disability was not on the “radar” of the government informants despite being a human rights duty and recommended in the UNGP and other relevant international guiding tools. The risk of discrimination due to disability has however gained no attention as a risk in the category of most salient risks for being addressing in risk management procedures according to the information obtained in the interviews. It would be reasonable to expect that Norway which has a rather high profile on human rights and business, would be particularly committed to guide business by unpacking the human rights duties and explore how a partnership with private sector could create opportunities for access and participation.

7.5. Concluding remarks and suggestions for leaving no one behind

There is a risk that the Norwegian policy commitment evaporates unless this commitment is clearly encouraged and effectively communicated as a policy priority from top political and management level. If inclusive development and growth aim to ensure equal access to the opportunities created for all segments of society, disability cannot be left out.

The capability approach emphasises the importance of accommodating practical opportunities for participation and inclusion of persons with disabilities. If given the opportunity, employment can become a source of freedom and economic independence for a person with a disability. As highlighted in the cases discussed, disability inclusion as an approach depends of removal of the barriers that deprive persons from opportunities. As the Norwegian human rights policy aims at ensuring equality in opportunities and outcome, it is imperative to provide resources for assessing how persons with disabilities could access and benefit from the PSD interventions.

248 Norfund: http://www.norfund.no/produkter_2/ Accessed 29 April 2017
249 UN Guiding Principles B. 3. Commentary p. 6, and IFC Performance Standards. P. 4, footnote 18
251 Mitra, 2016
As there is a need for interpreting the notion of inclusive development, the Ministry of Foreign Affairs should make an effort to ensure that all staff have sufficient awareness and understanding of what inclusion and non-discriminating practices entail. The resources in the OECD NCP as well as in-house resource persons should be given a responsibility to guide grant managers and grant recipients how to utilize relevant guidelines to assess potentials for disability inclusion in PSD program planning, monitoring and reporting.

The experiences from the ILO GBDN members Telenor and L’Oréal as well as from Ripples in the Water/NHO are not only worth exploring in the PSD programs, the informants were also eager to share their experiences with other stakeholders. The RIW companies had no particular financial muscles that one might expect being a precondition for practising inclusion, still commitment were profound and results extraordinary. The Norwegian government should investigate how these experiences could be transferred into their own aid funded PSD interventions. As noted by the private companies in the cases, there is a need to draw on alliances with organizations, other companies and governments to learn and develop inclusive practices. Further, the experiences from the ILO GBDN are of such success that the government should explore how it could build up a similar national network under the management of NHO.

There is a need to move beyond the perception that leaving no one behind is somebody else’s business. Governments and businesses have agreed to share responsibilities for implementing the 2030 Agenda. The business community is increasingly realising that disability inclusion is part of their business. As the informant from L’Oréal explained: “We are really at a point we like to go forward. Disability inclusion is an interesting frontier for us”.252 Governments have no excuse for not being equally ambitious in the quest for realizing the SDGs.

252 Interview with L’Oréal, LO 12, March 2017
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## Appendix 1 – List of interviews

<table>
<thead>
<tr>
<th>Code</th>
<th>Name</th>
<th>Position</th>
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<th>Organization</th>
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<tr>
<td>NF 1</td>
<td>Ola Nafstad</td>
<td>Head of Department</td>
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<td>Nor 2</td>
<td>Knut Olav Krohn Lakså</td>
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<td>Nor 5</td>
<td>Peter Molthe</td>
<td>Senior Advisor</td>
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<td>Paal Haavorsen</td>
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<td>Arbeid og Inkludering, NHO (Norwegian Employers’ Association)</td>
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<td>NHO 10</td>
<td>Jon Vea</td>
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<td>NHO (Norwegian Employers’ Association)</td>
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<td>OM 11</td>
<td>Ingrid Ihme</td>
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<td>LO 12</td>
<td>Christine Hillebrand</td>
<td>Program Manager</td>
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<td>L’Oreal</td>
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<td>OM 13</td>
<td>Habiba Sardar</td>
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<td>TBK 14</td>
<td>Trond Riiber Knudsen</td>
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<td>5 April 2017</td>
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