



2024



**DPO
SECTOR
FEEDBACK**

THE CIVIL SOCIETY COVENANT

table of CONTENTS

Contents 1

Core Priorities3

 1. Prioritisation of Led By-And-For Groups3

 2. End-to-end accessible coproduction.....4

 3. Requirement for Local Government Engagement with Monitoring ...5

 4. Incorporation of the UNCRPD in the Covenant Framework6

Secondary Guidance7

 Revitalising the 2010 Compact: Embedding Its Core Principles and
 Modernizing for Today’s Led By-and-For CSOs.....7

 Human Rights, Equity and Social Justice Framework.....8

 Legislative Changes.....9

Who we are..... 12

 Why this statement? 12

Background..... 14

 DPOs and ‘By-And-For’ organisations compared to non-Disabled
 people-led charities..... 15

 The legal framework for this statement..... 17

Our demands for Disabled People in the UK..... 17

 Our Four Step Plan..... 19

28 November 2024

To the Convening Mangers of the Civil Society Covenant at NCVO and ACEVO,

We write as representatives of the Disabled Persons' Organisations (DPOs)¹ Sector and advocates of disability rights, equity, and justice in response to the forthcoming generation of the Civil Society Covenant. Given the convening role of NCVO and ACEVO on behalf of the UK government, it is crucial that this covenant better reflects and respects the leadership and autonomy of Led By-And-For groups, particularly DPOs, whose insights are essential to safeguarding the rights of disabled people² in the UK.

We commend the efforts to ensure that the Civil Society Covenant addresses the evolving needs of civil society. However, we urge that this renewed framework prioritises a strengthened mandate for Led By-And-For groups in policy consultation and

¹ **Disabled Peoples Organisations:** An umbrella term for an organisation or group where Disabled people represent at least 75% of the board and 50% of staff and volunteers. DPOs actively demonstrate a commitment to the Social Model of Disability through its work, values and operations. Under the umbrella of DPO are D/deaf and Disabled People's Organisations (DDPOs), User-led Organisations (ULOs), Disabled-People Led Groups and Intersectional DPOs. An in-depth description of DPOs and By and For Organisations can be found in our Analysis '[We, Disabled People](#)'.

² **Disabled people:** We use the Social Model of disability to define Disabled people, which says that people are disabled by barriers in society. In this report, Disabled people can include: people with physical impairment, visual impairment, Blind, D/deaf people and people with hearing loss, long-term health conditions, invisible impairment, people with learning difficulties, people who experience mental distress and people who are neuro-divergent.

decision-making. Our core proposals for amendments to the covenant framework are as follows:

Core Priorities

1. Prioritisation of Led By-And-For Groups

DPOs are a type of CSO that are authentically led By-and-For their communities. Led By-and-For organisations provide direct insight and lived expertise needed to address inequalities. Yet, decision-making processes and government funding programmes frequently prioritise non-led By-and-For CSOs, which often lack the lived experience and alignment with our communities' goals (See *Figure 1 on page 13*).

We recommend the following adjustments to the covenant:

- **Explicitly prioritise Led By-And-For groups** in the initial stages of any government consultation, decision-making processes and funding³ with, including DPOs.
 - Ensure that Intersectional Led By-And-For groups⁴ are fully and equitably included.
- **Deprioritise non-led By-And-For charities**, including non-DPO disability charities, in consultation opportunities and funding, redirecting resources to organisations representing marginalised communities authentically and comprehensively.

³ To learn more about funding for Led By-And-For groups, read our [position statement and funding model](#).

⁴ Intersectional Led By-And-For groups: A community organisation governed and operated by individuals from the intersectionally marginalised communities it serves (e.g., Black women, Deaf migrants).

This addition aligns with **Article 4.3 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)**, upholding governments’⁵ consultation with and active involvement of Disabled people through our ‘*representative organisations*’ in decision-making processes.

2. End-to-end accessible coproduction.

The covenant must require the uptake of coproduction from the start of collaborative processes to support our full and equitable *partnership* from local authority to government. Coproduction budgets must cover Led By-And-For organisations’ accessibility and disability-related costs. These costs, which are not covered by Access to Work, are essential for effective communication and consultation.

Support must be accompanied by separate and fully covered disability-related budgets, including the development of Easy-Read documents, BSL interpretation and interpretation for people of whom English is not their first language. Ensure these expenses are easily claimable without additional bureaucratic hurdles, allowing Led By-And-For organisations, including DPOs, to focus on their primary objectives.

⁵ The United Kingdom ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2009. Therefore, the UK is a ‘party to’ or agreed to uphold the United Nations UNCRPD regulations. The UN Committee on the CRPD holds the UK accountable for its implementation of the convention.

Relevant operating organisations must collaborate with DPOs to understand how specific grant budget lines should cover access costs, embedding reasonable adjustments in those processes.

3. Requirement for Local Government Engagement with Monitoring

Local authorities profoundly impact the lives of disabled people, and CSOs' yet meaningful engagement with DPOs remains inconsistent. By embedding engagement as a monitored requirement, we can enhance service provision and decision-making that respects and reflects the needs of disabled communities.

The covenant should cover activities of local government bodies, who should be required to actively engage with Led By-And-For organisations, including DPOs; ensuring accountability and thorough implementation of the covenant's principles.

This engagement should be regularly monitored by Led By-And-For organisations, with accessible reporting mechanisms to uphold transparency and accountability.

This recommendation is also consistent with **the Localism Act 2011**, which mandates active engagement of local communities in governance, reinforcing the requirement for government bodies to be accountable and responsive to those they serve.

4. Incorporation of the UNCRPD in the Covenant Framework

We strongly advise that the covenant integrates the obligations of the **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)** and reflects the UK's obligations under **Article 4.3**, which mandates the involvement of disabled people and their representative organisations in decision-making processes. Implementing this article would be a substantive step toward ensuring that disabled people have the right to participate fully in decisions that affect their lives, as reflected in the mandate of the UNCRPD, which the UK ratified in 2009.

By enshrining Article 4.3 in the covenant framework, the UK government would be reiterating its commitment to uphold international disability rights standards and set a precedent for inclusive governance. We recommend:

- **Including Article 4.3 of the UNCRPD** as a guiding principle within the covenant framework, guaranteeing that government consultations systematically and equitably involve representative DPOs.

Secondary Guidance

Revitalising the 2010 Compact: Embedding Its Core Principles and Modernizing for Today's Led By-and-For CSOs

We believe it is essential to embed the valuable features of the 2010 Compact, which emphasised mutual respect, independence, and collaboration between government and civil society organisations (CSOs).

This includes:

- Respect CSOs independence, mission, values
- Involve CSOs at the earliest possible stage in policy design, reduce bureaucratic burden, provide 12-week consultations
- Commit to multi-year funding, a range of grants and contracts and remove barriers to application
- Ensure all bodies distributing public funds follow compact
- Ensure a voice for under-represented groups

However, to meet the current needs of Led By-and-For groups, particularly Disabled People's Organisations (DPOs), we must also update and strengthen key aspects of the Compact to reflect the evolving challenges our communities face today.

This Includes:

- ~~Ensure CSOs demonstrate social value~~ → Ensure CSOs reflect the communities they serve: At a minimum, 51% of

their employees and 75% of their board members should identify as part of the marginalised community they are advocating for.

- ~~Provide a timetable of actions for programmes~~ → Provide a clear timetable of actions for programmes, including provisions for reasonable adjustments to ensure accessibility and inclusivity.
- ~~Work with CSOs that represent protected groups and under-represented groups~~ → Prioritise partnerships with Led By-and-For organisations that are genuinely representative of under-represented communities, ensuring that decision-making power rests with those directly impacted.

Human Rights, Equity and Social Justice Framework

As CSOs founded on the principles of the Social Model of Disability⁶, Disability Justice⁷ and the UNCRPD, we urge the framework to be grounded in a Human Rights and pan-equity framework throughout. This requires a commitment from government authorities to take equitable steps to tackle discrimination and systemic oppression in the UK.

⁶ **The Social Model of Disability** emphasises that disability is not an inherent trait of an individual, but a result of barriers and discrimination imposed by society because a person's mind and body function differently from what is considered normative. *An in-depth description of the Social Model of Disability can be found in our Analysis 'The Tragedy Model versus the Social Model of Disability'.*

⁷ **Disability Justice:** A framework and movement that goes beyond the traditional civil rights-based approach to disability. It recognises the intersecting identities and experiences of D/deaf and Disabled people and focuses on collective liberation, interdependence, and the dismantling of all forms of systemic oppression (Sans Invalid, 2019).

Legislative Changes.

In respect to additional actions that public bodies can take to improve the relationship with civil society organisations, we urge public bodies to extend the principles of coproduction and review key legislative areas that significantly impact Led-By-and-For organisations. Current legislation which affects our ability to campaign, advocate, or deliver services must be re-developed in full partnership with DPOs from the outset. This includes, but is not limited to, the following Acts:

- **Lobbying Act:** Regulations that govern how charities and civil society organisations can engage in advocacy and public policy must be improved with Led-By-And-For organisations to prevent limitations on our vital work championing the rights of disabled people and other marginalised communities.
- **Procurement Act:** Public sector contracts often form a significant part of DPO service delivery, particularly with local authority. Currently, tender processes:
 - are inaccessible
 - privilege large at-cost organisations who do not represent the local community
 - prioritise short-term contracts that adversely impact the sustainability of small Led-By-And-For organisations.

Additionally, we are concerned about reports of local governance releasing payment-at-result contracts. This sets a dangerous precedent for the widespread distribution of such agreements, adversely impacting small CSOs' sustainability.

Therefore, procurement policies need to be reshaped through coproduction with us to ensure they are accessible, fair, and conducive to the sustainability of Led By-and-For organisations.

- **Police Crime Sentencing and Courts Act:** We mirror Liberty in its calls to:
 - Protect the fundamental right to protest by repealing both the Police, Crime, Sentencing and Courts Act and the Public Order Act
 - Repeal Sections 73 and 74 of the PCSC Act, removing police powers to clamp down on noisy protests.
 - Scrap undemocratic serious disruption regulations introduced through the back door, giving police a blank cheque to shut down protests.
 - Scrap broad, disproportionate protest offences – such as ‘locking on’ – that see both protesters and people going about their day-to-day lives needlessly swept into the criminal justice system
 - Remove discriminatory police powers to stop and search people at a protest without suspicion

We advocate for a robust, adequately compensated approach to coproduction, ensuring that DPOs are not only consulted but are true partners in the legislative process. This coproduction must be initiated from the very beginning of policy development to ensure that the resulting laws are equitable and truly representative of our communities’ needs.

By adopting a co-produced approach, the government can ensure that legislative frameworks are designed to collaborate with those directly impacted, thereby promoting more inclusive, effective, and fair outcomes.

Please find additional information about the DPO Sector, Led By-And-For organisations, the UNCRPD, and an explanation of non-disabled people-led organisations, attached to this letter.

Thank you for your attention to these crucial matters. We look forward to further dialogue to ensure that the covenant serves all members of civil society.

Sincerely,

DPO Forum England

Rebecca Tayler Edwards
DPO Development Manager
Disability Rights UK



Who we are.

We are a coalition of Disabled People's Organisations⁸ (DPOs) and grassroots groups led By and For Disabled people⁹. We are founded on the principles of the Social Model of Disability¹⁰ and Disability Justice¹¹.

We aim to dismantle systemic and institutional barriers and advocate for the rights and inclusion of Disabled people in all aspects of society.

Why this statement?

As organisations Led by and for Disabled people, we have come together to demand equitable consultation, funding and recognition from the government, local authorities, and

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⁹ **Disabled people:** We use the Social Model of disability to define Disabled people, which says that people are disabled by barriers in society. In this report, Disabled people can include: people with physical impairment, visual impairment, Blind, D/deaf people and people with hearing loss, long-term health conditions, invisible impairment, people with learning difficulties, people who experience mental distress and people who are neuro-divergent.

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¹¹ **Disability Justice:** A framework and movement that goes beyond the traditional civil rights-based approach to disability. It recognises the intersecting identities and experiences of D/deaf and Disabled people and focuses on collective liberation, interdependence, and the dismantling of all forms of systemic oppression (Sans Invalid, 2019).

policymakers. We aim to ensure that disabled people's voices and experiences shape the policies that affect our lives.

Despite our 45-year track record in advancing disability rights and systemic change, we face substantial challenges in securing meaningful engagement and funding compared to disability charities not led by disabled people. These charities, often with larger budgets and established government ties, systematically overshadow our efforts, perpetuating a cycle in which non-disabled voices influence disability policy and community work.

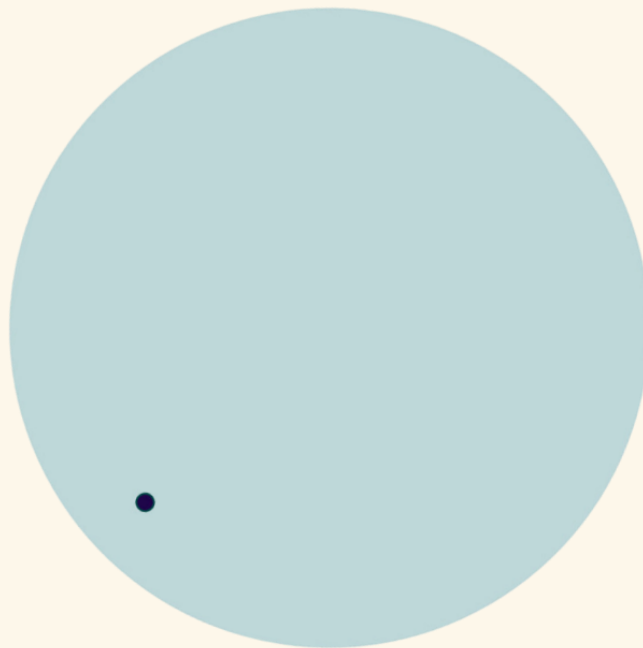


Figure 1. **Comparing the value of 1,457 government contracts** granted to 9 non-disabled people-led disability charities (represented in baby blue, with a total value of £460,081,899) compared with 148 contracts awarded to 90 Disabled People's Organisations (DPOs/DDPOs, represented in dark indigo, with a total value of £12,537,304) between 1 April 2022 and 31 March 2023 as reported to the Charity Commission. As a percentage, the 90 DPOs were awarded only 2.7% of the government contracts granted to the 9 non-disabled people-led charities (*Disability Rights UK, 2025. Pre-released Data*).

This finding was pre-released from Disability Rights UK's 2025 report, *'The Funding Gap: The Financial Disparity Between Disabled People-Led and Non-Disabled People-Led Charities in the UK.'* For updates and related releases, please refer to Disability Rights UK's [Funding Justice page](#).

This position statement calls for an inclusive policy and funding landscape that prioritises authentic, Led-by-and-for Disabled people's perspectives and ensures that those directly impacted by these issues have real authority in the decision-making process.

We also want this statement to stand in solidarity with our cross-movement comrades. We want to ensure that *all* Led-by-and-for organisations representing Racialised, Gender marginalised, LGBTQ+, Migrant, Traveller, Roma, and other marginalised communities are prioritised in decision-making processes and funding.

Background.

What are DPOs and By-And-For Organisations?

This coalition and the DPO Forum England recognise an organisation or group as a DPO when Disabled people represent at least 75% of the board and 51% of staff and volunteers.

Additionally, a DPO actively demonstrates its commitment to the Social Model of Disability through its work, values and operations.

Representing the community, we work with and for makes DPOs a type of **"by and for" organisation**. A "by and for" organisation is both led by members of the community it serves and operates primarily for that community's collective benefit. It ensures that

the voices and needs of its own community are at the forefront of advocacy and initiatives.

DPOs and ‘By-And-For’ organisations compared to non-Disabled people-led charities.

By developing our own organisations to represent our voices, DPOs provide an authentic space to campaign for our rights, equity, and justice. DPOs are not just stakeholders but the legitimate voices of Disabled people, ensuring that our lived experiences inform the creation of laws, policies, and practices designed to remove disabling barriers.

DPOs have been vital in advancing Disabled people's equality globally. Since the 1980s, our organisations have coproduced theory and practice that has transformed our lives, including creating the Social Model of Disability, the UNCRPD¹², the practice of independent living¹³ and self-directed support—our organisations to work to remove disabling barriers and advance rights and equity¹⁴.

¹² **UNCRPD:** United Nations Convention on the Rights of Disabled Persons.

¹³ **Independent Living:** The right to live independently and to be included in the community. As declared in Article 19 of the UN CRPD states that parties are required to ensure that Disabled people “Have the opportunity to choose their place of residence of where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement”.

¹⁴ **Disability Equity:** Disability Equity combines The Social Model and Disability Justice; advocating that equality alone does not provide for the additional support that will remove disabling barriers and create justice.

Disabled people still experience systemic exclusion and discrimination across all areas of life and are marginalised by institutions discussing **our** rights **without** us. Disability Charities or Non-Disabled People Led Organisations are organisations that focus on disability but are not led by Disabled people.

Non-Disabled People Led Organisations are actively harmful to DPOs and the Disabled people's movement. They appropriate our language about empowerment yet do not share their access to decision-makers or people in power with us. They take up the majority of funding¹⁵ going into the disability space whilst not letting Disabled people lead their organisations, campaigns and policy work. This perpetuates the paternalistic and charitable marginalisation of Disabled people. In the context of a professionalised sector, organisations not led by Disabled people *financially* benefit from talking about our oppression in the same society in which they are *privileged* by it.

¹⁵ We *highly* recommend that the reader review our analysis, '[What are Non-Representative Organisations?](#)' which breaks down the funding disparity between DPOs and non-disabled people-led organisations.

The legal framework for this statement.

This position statement is informed by forty years of expertise and the mandate of the UNCRPD.

Under Article 4.3 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), governments¹⁶ We must closely consult with and actively involve Disabled people through our *'representative organisations'* in decision-making processes. This reinforces our movement's principle of "Nothing About Us Without Us": decisions affecting Disabled people must not be made without their direct participation.

Our demands for Disabled People in the UK.

There are 14 million Disabled people in the UK, and we make up a fifth of the population. We are not a homogenous group: for example, we have different impairments, are different ages, genders and sexual orientations, and come from different ethnicities and backgrounds.

Some of us experience greater injustice, but we have many things in common. **We all want to live in an inclusive society** where everyone has a fulfilling life and feels connected and valued. We

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know our lives are not valued equally to others, we experience discrimination and oppression in our daily lives and disabling societal barriers to our inclusion and full participation.

Disabled people have been the hardest hit by austerity, the COVID pandemic and now the cost-of-living crisis. Evidence shows that we are disproportionately living in poverty, achieving poorer outcomes in education and far more likely to be unemployed or earn less. Many of us are forced into disability-based detention, treatment and live away from society, our communities and families to get support or education. Societal infrastructure, such as housing, transport and street environment, consistently fail to meet our needs. This is in breach of the UN CRPD.

We urge the UK Government to institute a radical reform programme, in coproduction with Led-By-and-For organisations, to tackle discriminatory policymaking and systemic oppression and injustice and to create a society where everyone has equal life chances and is valued and treated equally.

We need a long-term Disability Strategy, co-produced with Disabled people and our organisations, that tackles the root causes of our oppression and delivers fundamental reform and investment to enable Disabled people of all ages, genders and backgrounds to thrive.

Our Four Step Plan.

Representation and Voice: We want Disabled people to participate across all political and public roles, with the required adjustments put in place, so we can achieve real justice and equality.

Independence: We want the right to live independently with choice and control over the support we get and where we live.

Rights: We want to fully enjoy all rights guaranteed by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The discrimination we face in all areas of life must stop.

Inclusion: We want plans for every aspect of life to address the specific needs of Disabled people from the outset

Take a look at our plan for breaking down the oppression of Disabled People in the UK at:

www.disabledpeoplesmanifesto.com

Yours sincerely,

DPO Forum England

