



NSW Disability Inclusion Action Planning **Guidelines**

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The quotes and practice examples provided throughout these guidelines have been captured from participants at various consultations and through the provision of case studies, to inform the development of the NSW Disability Inclusion Plan and Disability Inclusion Planning Guidelines.

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Contents

Acknowledgements	2
Front cover photo credits:	2
Contents	3
Introduction	5
Inclusion policy and legislation	5
Flexibility in application	6
A new approach	7
2 How to use these guidelines	8
3 Overview of Disability Inclusion Action Plans	9
3.1 The case for inclusion	9
3.2 Policy and legislative context	10
3.2.1 NSW Disability reforms	10
3.2.2 Overarching policy and legislation	11
3.2.3 Other relevant legislation	12
3.2.4 The role for Disability Inclusion Action Plans	16
3.3 Key outcome areas	16
3.3.1 Attitudes and behaviours	16
3.3.2 Liveable communities	17
3.3.3 Employment	18
3.3.4 Systems and processes	20
4 Disability Inclusion Action Plan outline	22
5 Step by step plan for Action Plan development & implementation	24
5.1 Allocate executive ownership and responsibility	24
5.2 Map your functions, facilities, services and information sources	25
5.3 Determine governance and accountability arrangements	25
5.4 Consultation and co-design with customers, staff and the community	26
5.4.1 Plan the consultation	27
5.4.2 Select appropriate consultation methods	28
5.4.3 Decide who to engage	29
5.4.4 Ensure full accessibility	29
Additional Resources - Consultation	30

5.4.5 Report on the consultation	30
5.5 Undertake disability inclusion action planning	31
5.6 Develop risk mitigation strategy	31
5.7 Prepare a monitoring and reporting strategy	32
5.8 Plan for continual engagement	33
5.9 Publish your Action Plan	33
5.10 Promote the Action Plan to staff and the community	34
5.11 Evaluation	34
5.12 Initial support	35
6 Additional resources	36
6.1 Links and resources	36
6.2 Suggested reporting template	38
7 References	39
8 Abbreviations	40

Introduction

New South Wales (NSW) is entering a new era in disability inclusion planning. This reflects a renewed commitment to the importance of inclusion in building a strong and equitable community in NSW.

The NSW Government is committed to supporting the fundamental right of choice for people with disability. People with disability must have the same right to choose the way to live their lives, to access the same opportunities and enjoy the benefits of living and working in our society. NSW is ensuring the mainstream services it provides are accessible. This underpins disability inclusion planning in the NSW public sector.

Inclusion policy and legislation

The Disability Inclusion Act 2014 (DIA) demonstrates the ongoing commitment of the NSW Government to building an inclusive community and requires the government to produce a Disability Inclusion Plan. The NSW Disability Inclusion Plan supports the DIA and provides a strategy to implement the Act's objects and principles across government and the community. Disability Inclusion Action Plans (Action Plans) also mandated by the DIA, play a critical role in promoting the ethos of inclusion and provide the practical measures by which intent is transformed into action by agencies and local government.

Action Plans will outline the practical steps NSW Government agencies will put in place to breakdown barriers and promote access to services, information and employment and promote the rights of people with disability.

The social model of disability, outlined in the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), states people with disability are not disabled by their impairment but by the barriers in the community that prevent them gaining equal access to information, services, transport, housing, education, training, employment, and social opportunities. The NSW Government will provide a positive role model of inclusion for other sectors of the community.

Analysis indicates that there are significant economic reasons for increasing the inclusiveness of our society. There are financial gains for both individuals and for the economy by moving people into productive and fulfilling employment and by reducing modification costs through inclusive planning and the application of universal design principles.

It is the social responsibility of the NSW community to work to remove the barriers, so that people with disability can fully participate in community life, with less reliance on others and on specialist services. The National Disability Strategy 2010-20 (NDS) identifies the key priorities and associated actions to remove barriers in its whole-of-government plan. The NSW NDS Implementation Plan 2012-2014 was the NSW response to the NDS. Whilst some actions under this plan are continuing, the NSW Disability Inclusion Plan sets the new framework for inclusion in NSW.

The Disability Inclusion Act 2014 defines disability as:

‘The long-term physical, mental, intellectual or sensory impairment which in interaction with various barriers may hinder the full and effective participation in society on an equal basis with others.’

This definition reinforces the importance of viewing disability as the result of interaction between people living with a range of impairments and their physical and social environment. Disability is not just about the impairment. The onus to break down barriers rests with the whole community.

Disability action planning is not a new approach. Since the introduction of the NSW Disability Services Act 1993 (DSA), all NSW government departments and some other government bodies have been required to undertake disability action planning. The DIA replaces the DSA, and strengthens the commitment to inclusion, consultation with people with disability and protection of their rights.

These guidelines apply to all NSW government departments, some other government agencies and statutory bodies which are included in the [Disability Inclusion Regulation 2014](#) and local councils. The term ‘public authority’ is used throughout these guidelines to describe these entities. Of course all other bodies or organisations that are not required to make Action Plans by law, but which choose to do so, can follow these guidelines too.

Under the [Disability Inclusion Regulation 2014](#), public authorities that are required to have Action Plans are required to have them in place by 1 December 2015. Local councils are to have Action Plans in place by 1 July 2017. A number of public authorities may already have plans in place that meet the criteria of a Disability Inclusion Action Plan under these guidelines.

There have been many major successes of disability action planning over the years, contributing to improved access and inclusion for people with disability, however there remains significant scope for improvement. These guidelines focus on increasing consultation and involvement of people with disability throughout the planning and implementation phases.

Flexibility in application

These guidelines are intended as a tool to assist with the development of Action Plans. The guidelines are provided to ensure that there is a concerted whole of government, whole of community approach in addressing the areas that people with disability have identified as priorities.

While the guidelines are aligned with the areas of focus of the NSW Disability Inclusion Plan, it is recognised that all public authorities will need to operate within their own legislative and compliance framework established by the laws, standards and good practices that guide delivery of government services.

The guidelines provide a framework that accommodates the major focus areas for inclusion and provide an approach to addressing issues through engagement, planning and co-design of solutions. It is recognised that flexibility within the provision of service delivery and infrastructure will be required to ensure the needs of all people with disability are considered in providing services.

The Department of Family and Community Services (FACS) will work with NSW public authorities to support the development of initial Action Plans by December 2015 and their implementation and review over time.

FACS will also work with the Department of Planning and Environment, Office of Local Government and Local Government NSW to develop specific resources and supports to allow councils to integrate action planning within their Community Strategic Planning and Delivery Program cycle by June 2017.

'Inclusion means I can pass a course and get another level of qualification and pursue equal opportunity employment.'
Case study participant

A new approach

Key changes from the 2008 guidelines include:

- Name – Previously known as Disability Action Plans the DIA now requires NSW public authorities to have Disability Inclusion Action Plans (Action Plans).
- Legislative basis – The Disability Services Act 1993, has been replaced by the Disability Inclusion Act, which requires all government departments and certain public authorities (as defined in the DIA) in NSW to have a Disability Inclusion Action Plan.
- Key focus areas – The four areas are aligned to the NSW Disability Inclusion Plan, to ensure Action Plans align with the areas identified by people with disability as the priority for concerted and sustained attention.
- Consultation – A greater emphasis on consultation at all stages of planning, implementation and monitoring and direction on how to conduct inclusive consultation with stakeholders, staff and the community have been included.
- Governance – Highlighting the importance of ensuring governance and accountability are in place at the outset and advice on designing governance and accountability arrangements to encourage effective implementation.

2 How to use these guidelines

These guidelines have been arranged into sections as follows:

- Overview of Disability Inclusion Action Plans – Background information on disability reform, Action Plans and the current policy and legislative context; the importance of integrating inclusion as core business into all NSW public authorities; and the key outcome areas under which to organise disability inclusion commitments.
- Disability Inclusion Action Plan outline – Provides a suggested outline for the plans which reflects the requirements of the Disability Inclusion Act. Given the diverse operating contexts of NSW public authorities, this outline is suggested as a guide only.
- Step by step plan for Action Plan development and implementation – A guide to developing and implementing a high quality plan based on best practice.
- Additional information – Glossary of acronyms; a list of useful resources; and contacts for additional support.
- Additional resources and support – These guidelines will be updated over time in response to feedback, and as new resources, or approaches are developed. Users are encouraged to visit the FACS website for updated versions and access to tools, learning and development and monitoring and evaluation resources.

Additional support or information is available via:

- Disability Inclusion line on 1800 782 306
- Email: NSWDIP@facs.nsw.gov.au
- Webpage: www.facs.nsw.gov.au/diap

3 Overview of Disability Inclusion Action Plans

3.1 The case for inclusion

Personal choice and control for all people in society is only possible in a community which ensures access and inclusion for people with disability, including physical disabilities, intellectual disabilities, cognitive disabilities, sensory disabilities, and those with mental health conditions. Without an inclusive society and the opportunities that an inclusive community provides, diversity is not promoted, control over choice is limited and positive change for people with disability may not occur.

The case for an inclusive society and community is strong:

- As a community, we are poorer without a diverse range of viewpoints and individual perspectives.
- Exclusion leads to disadvantage and discrimination, which have far reaching negative impacts across all aspects of life, including health, welfare, education and employment. These impacts are felt beyond the individual, with family units and the broader community all being negatively impacted by a non-inclusive society.
- There is a strong economic imperative for increasing the inclusiveness of our society. Analysis indicates that providing people with disability real job opportunities and the chance to move off social service dependence can have a large economic impact.¹

Greater inclusion of people with disability in the community is also recognised as a fundamental purpose of the National Disability Strategy 2010-2020, the current ten year plan aimed at improving the lives of Australians with disability, their families and carers.

Critical to achieving positive change and creating a more inclusive NSW is the provision of an overarching strategy, the NSW Disability Inclusion Plan, which provides a basis from which to build a more inclusive NSW for all people with disability.

By bringing to life the vision for a fully inclusive NSW as articulated in the NSW Disability Inclusion Plan, Action Plans will enable NSW public authorities to enjoy the social and economic benefits of planning for greater inclusion. Depending on the operating context, each public authority in NSW will have a unique business case for supporting inclusion of people with disability. This rationale should be explored and documented in each Action Plan.

¹ Deloitte Access Economics (2011) The Economic Benefits of Increasing Employment for People with Disability.

‘My hope is that we will be employing young graduates, coming out of their high school programs and giving them on the job training and pushing them through and influencing our supporters to provide better training programs for young people with disability...because it’s a winner.’

Case study participant

REMEMBER: Action Plans should be positioned as core business and integrated with existing planning cycles, so that employees at every level consider inclusion of people with disability in their business.

3.2 Policy and legislative context

NSW is currently undergoing a period of major reform in the disability sector. Within this context of change, NSW has demonstrated an ongoing commitment to improving inclusion for people with disability.

3.2.1 NSW Disability reforms

The NSW Disability Inclusion Act 2014 (DIA) continues the government’s commitment to improving the lives of people with disability and reaffirms the state-wide focus on building a truly inclusive community, through planning and coordination across all levels of government and across portfolios.

The DIA is a progressive piece of legislation reflecting the person-centred approach to disability services and inclusion while continuing to provide the legal foundation in NSW for regulating supports, services, and funding to people with disability until full transition to the National Disability Insurance Scheme (NDIS). The DIA also requires the development of the NSW Disability Inclusion Plan and Action Plans which provides NSW’s ongoing commitment to people with disability beyond full roll-out of the NDIS.

The dedicated NSW Disability Inclusion Plan, provides a whole of government strategy to support the objects and principles of the DIA. Specifically, the NSW Disability Inclusion Plan sets out:

- 1** The whole of government goals that support the inclusion in the community of people with disability and to improve access to mainstream service and community facilities by people with disability; and
- 2** Provides for collaboration and co-ordination among public authorities in the provision of supports and services.

The DIA creates an obligation for certain public authorities to develop Action Plans. An Action Plan is a statement of commitment by NSW public authorities to inclusion and to the vision of the NSW Inclusion Plan while also functioning as a practical plan, setting out how the authority will realise this vision.

As outlined in figure 1, the four themes of the Disability Inclusion Plan are carried across to the Action Plans. This emphasises the whole of government commitment to progress these areas. It is recognised that each public authority in NSW operates with legislative and policy obligations beyond these four areas, such as federal standards in transport, education and health. All Action Plans should be planned, developed and implemented in consideration of the unique legislative and policy responsibilities of each agency.

‘As a wheelchair user, this is one venue (Acer Arena), I never hesitate to book tickets at. It means I can sit with my friends and not by myself.’

Case study participant

3.2.2 Overarching policy and legislation

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

The UNCRPD, ratified by Australia in 2008, acknowledges that people with disability have the same human rights as those without disability. This commits participating governments to ensure these rights can be exercised and that barriers are removed. Importantly, implementing a rights-based approach under the UNCRPD does not limit governments to addressing the provision of specialist services to people with disability – it requires mainstream services to be provided in a way that does not directly or indirectly prevent people with disability fully participating. This focus on mainstream service access means that all levels of government, as well as other parts of the community, have a role to play in giving effect to the UNCRPD.

National Disability Strategy 2010-2020 (NDS)

The NDS 2010-2020, developed in partnership by the Commonwealth, state and territory and local governments, sets out a national plan for improving life for Australians with disability, their families and carers, to support the commitment made to the UNCRPD. The NDS is designed to guide public policy across Australia and specifically aims to bring about change in all mainstream services and programs.

The NDS sets out six priority areas which reflect the broad scope of the UNCRPD, for action to improve the lives of people with disability, their families and carers. The NDS NSW Implementation Plan 2012-2014 was the NSW Government’s initial two-year strategy to promote the principles of the NDS. These principles have now been aligned with the objects of the Disability Inclusion Act (2014) and Disability Inclusion Plan. The NSW Government continues to work with the Commonwealth to progress actions and report on progress particularly through the COAG and the Disability Minister’s forum.

3.2.3 Other relevant legislation

In addition to the UNCRPD and the NDS, there are additional pieces of legislation that provide a framework and basis for disability inclusion action planning.

Commonwealth Disability Discrimination Act 1993 (DDA)

The Commonwealth Disability Discrimination Act 1993 (DDA) recognises the rights of people with disability to equality before the law and makes discrimination based on disability unlawful. The DDA covers many areas of life including employment, education, access to premises and provision of goods, services and facilities. DDA sections 60 and 61 set out the provisions for the completion of Action Plans that fulfill the intent of the DDA and sets measurable and accountable goals. Public authorities may wish to draft their Action Plans under the DIA in such a way as to comply with both the DIA and the DDA.

NSW Anti-Discrimination Act 1977 (ADA)

The NSW Anti-Discrimination Act 1977 (ADA) relates to discrimination in places of work, the public education system, delivery and goods and services including services such as banking, health care, property and night clubs.

NSW Government Sector Employment Act 2013

The [Government Sector Employment Act 2013](#) (GSE Act) and the associated Regulation and Rules provide a new statutory framework focused on NSW government sector employment and workforce management. The GSE Act repealed the requirement for Equal Employment Opportunity Management Plans under the ADA. Instead strategies for workplace diversity are now required to be integrated with workforce planning across the government sector. Integrating diversity requirements into workforce planning represents a shift in the way diversity is addressed in public sector employment. More information is available is on the Public Service Commission [website](#).

REMEMBER: Public authorities are responsible for ensuring they meet the legislative and compliance obligations of all relevant legislation – these requirements will vary depending on the activities of each agency.

Additional Resources - Legislation

The following legislation may assist when developing Disability Action Plans.

NSW

NSW Disability Inclusion Act 2014

NSW Government Sector Employment Act 2013

NSW Anti-Discrimination Act 1977

NSW Legislation can be found at: www.legislation.nsw.gov.au

Commonwealth

Disability Discrimination Act 1992 (Cth)

Commonwealth legislation can be found at: www.comlaw.gov.au

Useful disability policy links include:

NSW Disability Inclusion Plan www.facs.nsw.gov.au/dip

NSW Disability Action Planning www.facs.nsw.gov.au/diap

[National Disability Strategy](#)

[National Disability Insurance Scheme](#)

Figure 1

Relationship between Disability Inclusion Act 2014, NSW Disability Inclusion Plan and Disability Inclusion Action Plans

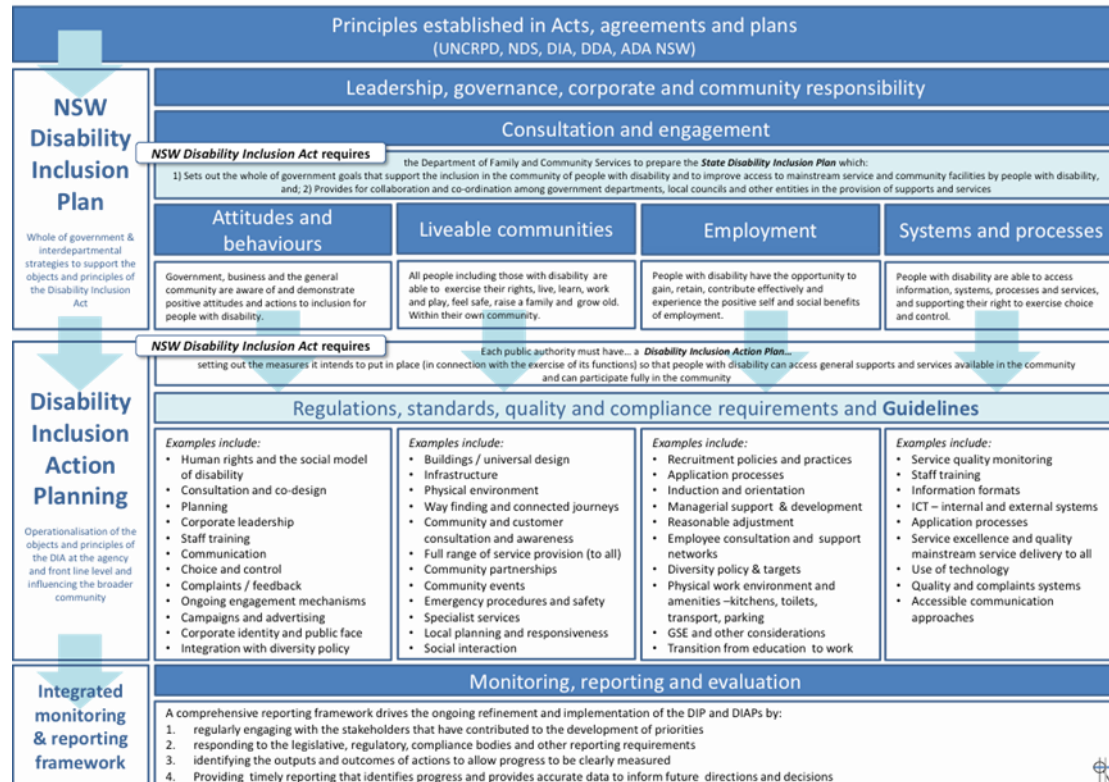


Figure 2 – The relationships between the relevant policy and legislative instruments



3.2.4 The role for Disability Inclusion Action Plans

Action Plans will play an important role in fully including people with disability in our society. They will:

- provide a public statement of the commitment to accessibility and inclusion among public authorities promoting equal rights for all
- communicate the vision for inclusion across public authorities, for staff, stakeholders and the broader community
- put the principles outlined in the DIA and the NSW Disability Inclusion Plan into practice across public authorities
- outline specific actions to facilitate access to mainstream services for people with disability, potentially with some level of adaptation or adjustment
- be a vehicle to engage with the internal and external disability community to bring to life real solutions for better inclusion
- include assessment and monitoring of actions within each plan

The complex structure and functions of some NSW public authorities may require them to individually assess their responsibilities under the DIA and other laws and decide whether to develop a department level Action Plan, or multiple agency level Action Plans for each agency or division. It is envisaged that some NSW government departments may develop an overarching plan with sections that relate specifically to unique areas of business and/or service delivery within their cluster. Regardless of the number of Action Plans to develop and implement and at what levels, disability inclusion action planning should be integrated as part of broader corporate and budget planning processes.

3.3 Key outcome areas

The disability action planning areas of focus provide a suggested structure for a disability Action Plan and examples of relevant actions for each area.

3.3.1 Attitudes and behaviours

The attitudes and behaviours of the general community towards people with disability have been described as the single greatest barrier to full access and inclusion. Attitudes and behaviour permeate all aspects of life. Consultation to date has identified that attitudes towards people with disability are often determined by ignorance, fear or lack of opportunity to interact. Developing positive attitudes involves increasing awareness and changing negative perceptions over time. This is a long term goal that may need to be dealt with in stages.

Examples of actions might include:

- integrate training on disability access and inclusion into all staff induction/orientation practices
- develop specific training for front line and service delivery staff to demonstrate competency in inclusive practice and service provision
- review and adjust funding agreements and contracts to specify delivery of accessible and inclusive services and programs by third parties or contractors
- develop messages and campaigns that highlight the case for disability inclusion
- involve people with a disability in the development of communication campaigns regarding disability inclusion

Practice examples – attitudes and behaviour

The NSW Department of Justice has introduced a program of flexible service delivery training for policy and operational staff across the agency. Training recognises the specific support needs of people with disability who may come into contact with the justice system to ensure they are considered.

The City of Sydney provides a specific program dedicated to training all staff involved in community consultation to consider the necessary requirements for an inclusive community.

3.3.2 Liveable communities

Creating liveable communities will focus attention and resources on the elements of community life that most people desire. Creating liveable communities for people with disability is more than modifying the physical environment, it covers areas such as accessible housing, access to transport, community recreation, social engagement and universal design.

Examples of actions might include:

- providing accessible toilets in all public buildings
- providing change tables (including adult change tables) in appropriate locations
- applying the principles of universal design in the planning of new infrastructure and buildings
- ensuring community events are accessible and venues, transport, toilets and parking are considered in the planning
- engaging people with disability in the design and planning phases of new major infrastructure and buildings

- conducting audits of buildings owned or leased by the authority to assess compliance with Australian standards for access and mobility (AS1428 parts 1 to 5)

Practice examples – liveable communities

Transport for NSW includes specifications for accessibility, in line with the Transport Standards in the design phase for all future purchases or provision of public transport infrastructure such as busses, trains and ferries.

The Department of Family and Community Services partnered with the National Public Toilet Map Project and Spinal Cord Injuries Australia to improve the breadth and quality of information on accessible public toilets in NSW.

3.3.3 Employment

The Government Sector Employment Act 2013 (GSE Act) requires the integration of workforce diversity, including the employment of people with disability, into workforce planning. In particular, [section 63](#) of the GSE Act provides that the head of a government sector agency is responsible for workforce diversity within the agency and for ensuring that workforce diversity is integrated into workforce planning in the agency. This legislation supports workforce diversity obligations and processes across the government sector.

Employment and economic security for most people are closely related. Employment contributes to feelings of self-worth, social interaction and mental health, and increases opportunities to support individual choice and control. Employment rates for people with disability are significantly lower than those without disability across all sectors. People with disability experience multiple barriers at all stages of the employment process, ranging from inaccessible interview venues, lack of reasonable adjustments to the work environment, poor career planning opportunities, rigid role descriptions and online testing that may place applicants at a disadvantage. These factors reduce their opportunities to gain and retain employment.

There is also good evidence to show that organisational commitment to workforce diversity and inclusion is closely linked to strong business performance. Recent research by Deloitte and the Victorian Equal Employment Opportunity and Australian Human Rights Commission found evidence of a performance ‘uplift of 80% when both conditions [commitment to diversity and to inclusion] were high’². The research report goes on to say

² Victorian Equal Opportunity and Human Rights Commission and Deloitte., *Waiter, is that inclusion in my soup?*, Research Report, 2012

that when employees think their organisation is committed to, and supportive of diversity and they feel included, they ‘...report better business performance in terms of ability to innovate (83% uplift), responsiveness to changing customer needs (31% uplift) and team collaboration (42% uplift)’. The research highlights the importance of understanding that inclusion at work is about more than fairness and respect - it is also about being valued and a sense of belonging.

While there are many aspects to consider in executing a diversity and inclusion employment agenda, most benefit will come from taking an ‘inclusion by design’ approach. That is, employers and managers will maximise their ability to employ and retain a diverse workforce if they build inclusion into work design, workforce strategy and system-level decision making (as opposed to simply making reasonable adjustments to accommodate persons with disability on a case-by-case basis). For example:

- Design all work as flexibly as possible, with a focus on achieving the desired outcomes rather than starting from required work methods, location, hours and so on;
- Actively develop respectful and welcoming work cultures;
- Make diversity and inclusion a key consideration for strategic workforce planning;
- Develop specific attraction and retention strategies;
- Design role specifications and advertisements to avoid knowledge or capability requirements that are not essential for satisfactory performance in the role;
- Design recruitment assessment methods to optimize the opportunities given to all applicants to demonstrate their merits against the job requirements;
- Incorporate strategies and plans into learning and development opportunities as well as career planning;
- Promote flexibility and accountability for all staff in the way that they work;
- Make equity and access key criteria for decisions about physical infrastructure, and information and communications technology;
- Keep inclusion front-of-mind when designing workforce management processes and practices; and
- Commit to regularly review the efficacy of the approach at systems and individual level in order to refine and improve.

In designing inclusive workforce strategies, agencies should draw on relevant data to ensure that workforce planning is evidence-based. Data sources may include internal agency records, databases and surveys; Workforce Information Profiles; and the results of the annual People Matter Employee Survey. These data sets can assist agencies to understand their current position, challenges and opportunities. E.g. agencies may wish to consider information about the level, type and distribution of employment of people with

a disability within their agency at present and over time; turnover and recruitment rates, and so on. With this information they can plan more effectively. Authorities should also develop a strategy to encourage all staff to provide their diversity data so that the organisation's 'picture' is as accurate as possible. Actions to improve engagement and support for people with disability in public sector workplaces will include enhancing employee networks such as the Disability Employee Network outlined in the NSW Disability Inclusion Plan.

Guidance on specific actions that support employment for people with disability will be developed in further supporting material to these guidelines.

REMEMBER: Many people with disability do not wish to identify as having a disability when applying for a job as they fear a negative consequence. People with disability are more likely to respond to job advertisements that actively demonstrate a culture that is inclusive and disability conscious. It will be hard to progress until we can create an environment where people are comfortable identifying as having a disability.

Practice examples - employment

The Commonwealth Bank of Australia developed a bi-annual Diversity Support Mentoring Program for job seekers with disability, pairing university students with disability with mentors within the bank to gain exposure to the workforce.

The NSW Department of Trade and Investment undertook an applicant perspective recruitment process review with Australian Network on Disability to identify any unintended barriers in the mainstream recruitment processes.

3.3.4 Systems and processes

A common issue for people with disability is the difficulty in navigating systems and processes to access the services and supports they need in the community. Some of these difficulties stem from the quality of service and training of front line personnel, the systems and processes required to access services, and the lack of accessible options for communicating, accessing information or providing input or feedback. There is often confusion about what services are provided across the three levels of government, and there is frequent repetition of information to be provided to public authorities and services.

Examples of actions to support improvements in this area might include:

- ensuring all service information is available in accessible electronic formats

- ensuring service users have access to communications supports such as hearing augmentation, touch screens and translation services
- mandating all feedback and complaint mechanisms to be fully accessible
- requiring web content compliance with at least conformance level AA in the W3C's Web Content Accessibility Guidelines
- providing a mechanism for feedback on access and inclusion in NSW
- ensuring internal systems and processes are accessible to staff with disability

Practice examples – systems and processes

The NSW Department of Premier and Cabinet are leading the introduction of the Web Content Accessibility Guidelines 2.0 to improve access to all NSW Government websites. This will make it easier for those interacting with the government to find the information they need.

ANZ Bank has embedded inclusion thinking into their product design, review, approval and communications processes. These processes have been reviewed to ensure they consider accessibility criteria and standards.

REMEMBER: there is no one checklist of actions that lists good practice or required actions, as one size fits all approaches are not appropriate. Priorities should be determined through consultation and planning to target barriers to access experienced by agency's clients, students, patients, workforce, customers or communities.

4 Disability Inclusion Action Plan outline

The following outline provides a suggested structure for Action Plans. Organisations may wish to incorporate additional information in their Action Plans to address specific legislation, standards or policy.

Introduction from minister/secretary/mayor

Each public authority should provide a statement of vision and commitment to the principles of the NSW Disability Inclusion Plan, the UNCRPD and the National Disability Strategy, emphasising the importance of inclusion of people with disability based on ethical and economic imperatives.

The unique case for inclusion should be identified by each public authority, and a commitment affirmed to making inclusion core business.

Guiding Principles

The Guiding Principles outline the specific approach to inclusion given a unique operating environment, customer and staff profile. As a guide, public authorities should outline between 3-10 Guiding Principles.

Policy and legislative context

Authorities should reference the UNCRPD, the National Disability Strategy, the DIA, DDA, ADA and the GSE, AND other legislation or regulations applying to the specific agency for example federal standards.

Our customers and staff

Each public authority should establish a profile of the range and scale of disability among their service users, potential service users and staff. This profile can be used to articulate the argument for improving interaction/inclusion and provide direction on potential priority areas and population groups.

Consultation governance and resources

Each Action Plan should describe:

- the process undertaken to develop the plan including consultation, participants, research and planning
- the governance and accountability arrangements
- resources and the process for developing actions

Key outcome areas and actions

The four focus areas of the NSW Disability Inclusion Plan provide a proposed structure under which to group actions. Additional outcome areas may be required to reflect the operating context within each department/agency.

Each action should be as detailed as possible, at a minimum including:

- outcome area
- action title and description
- aim and expected outcome
- target population or audience
- timeframe for action to be commenced/achieved
- individual or area responsible
- resources
- specific and measurable indicators to assess performance
- reporting requirements

Monitoring, reviewing and reporting

Outline an evaluation framework and detailed plan to monitor, measure and review results to track and report on Action Plan.

5 Step by step plan for Action Plan development & implementation

The following is a step-by-step approach to assist public authorities plan the Action Plan development and implementation process. Each public authority drafting an Action Plan will need to consider their specific operating context, existing planning cycles and objectives and adjust this approach for development and implementation accordingly.

5.1 Allocate executive ownership and responsibility

Before allocating specific responsibilities in development and implementation, at least one executive level sponsor within the department should be identified. The sponsor(s) will champion the importance of inclusion planning for people with disability throughout the organisation, assume overall accountability for resourcing and planning decisions, and commit to driving the inclusion action planning process.

REMEMBER: The Disability Inclusion Action Plan must be sponsored and championed at the executive level to position inclusion planning as a high priority.

Following the appointment of an executive level sponsor, a lead officer or project manager to chair the Disability Inclusion Action Planning working group and lead the development and implementation should be identified. This internal working group should have representation from operational and service areas of the authority including customer services/front-line staff.

The Action Plan development and implementation requires a range of skills across community consultation, strategic and operational planning, measurement, communications development and organisational change, therefore the ideal working group should be a multi-disciplinary team.

Consider bringing in outside experts to the working group such as people with disability or representatives of disability organisations (the Disability Council NSW for example), taking care to achieve an appropriate representation across the range of disability.

REMEMBER: Resources must be allocated for Disability Inclusion Action Plan development and implementation as part of budget planning.

5.2 Map your functions, facilities, services and information sources

To develop effective Action Plans, working groups will ideally need a clear picture of the overall operating environment in which improved inclusion may be possible.

Each member of the internal working group should invest time into preparing a list of their service areas' operations, including programs, facilities, public information sources, services including contracted operations and an organisational structure including all internal roles and contractors. In addition, typical service user pathways should be identified.

The term 'service users' has been used throughout this document as a collective term for NSW public sector users that may include customers, patients, students, people in contact with the justice system and other service user types.

Once each service area is identified and areas for improved inclusion are documented, the working group should come together to:

- identify opportunities for improved inclusion
- identify additional areas through consultation with staff with disability, the disability sector and members of the disability community
- identify actions, resources, strategies and approaches to improve inclusion in the disability sector and members

REMEMBER: Including case studies and examples throughout can be effective ways to highlight achievements of inclusion planning.

5.3 Determine governance and accountability arrangements

Governance structures exist to provide clear and transparent lines of accountability. A strong relationship exists between good governance and good government performance.

In order for Action Plans to be successfully implemented and drive real and lasting change, governance and accountability arrangements must be established early and clearly communicated.

This may be achieved through the incorporation of indicators tied to positive inclusion outcomes for senior management. It may also involve allocating specific ongoing responsibility for monitoring and evaluating implementation of the plan.

In some cases public authorities may choose to link performance indicators directly to disability inclusion outcomes.

REMEMBER: Governance and accountability structures should link disability inclusion planning, implementation and reporting directly to the executive level of public authorities.

5.4 Consultation and co-design with customers, staff and the community

An essential element in preparing an Action Plan is community consultation and engagement. This ensures the plan is focused on the needs of staff and customers and service users. When done well, consultation should give respect to the lived experience of people with disability, empower people to influence the direction of their lives and encourage full participation to enable the identification of barriers and propose solutions. Section 12 of the DIA mandates this consultation.

Consultation and engagement takes time and skill to do well. Consultation with communities and staff with disability is essential in the development of Action Plans and while this adds a layer of complexity if considered carefully and included in the early planning stages it adds great value to the process.

REMEMBER: Section 12 of the Disability Inclusion Act 2014 mandates that disability inclusion planning should be done in consultation with people with disability.

Consultation should be approached as a process of co-design and collaboration with staff and communities, rather than an information briefing. For consultation and engagement to be truly collaborative, it must commence at the beginning of the development process, with multiple opportunities for involvement and a commitment to informing all participants of the progress and outcomes of each consultation occasion.

The International Association for Public Participation has developed the 'Spectrum of Participation' described in figure 3 below which relates to different forms of stakeholder participation. The five levels of engagement within the Public Participation Spectrum are summarised in the diagram below. Stakeholder participation in the development of the Action Plan should be approached in the spirit of involvement, partnership and collaboration, to ensure hopes and concerns among the community are reflected in plan's commitments.

Figure 3 The spectrum of engagement and participation in consultation



5.4.1 Plan the consultation

Working groups should develop a detailed consultation plan, for both internal and external consultation. Well thought out planning will maximise participation.

When conducting any consultation, the following checklist for good practice should be considered:

- Always make the purpose of consultation clear;
- Acknowledge the scope for influence, and the limitations associated with each consultation;
- Remember the rights of people with disability to be involved in decision making that affects their lives, as well as their right to not participate;
- Ensure all information such as documents, invitations, directions, forms etc. are in accessible formats including websites, community languages, participation, ration, to ensure hopes and concerns among en promoting consultations;
- Provide adequate time, both in terms of notifying stakeholders of engagement opportunities and time allowed to access, review and respond to materials;
- Be mindful that people with disability may require a longer lead time in which to organise transportation to the consultation;
- Bear in mind the cost of involvement to participants and consider reimbursing costs associated with participation such as transport costs, reply paid envelopes and paying sitting fees for regular contributors;
- Consider the value of convening joint consultations with other NSW public authorities;

- Ensure participants are informed at consultations how their information will be used and report back to participants regarding the results and next steps of engagement; and
- It may not always be possible to canvas the views of all disability groups, especially in smaller communities.

Public authorities should consider the needs of all disability groups, irrespective of whether they are able to participate in the consultations. Alternative consultation methods are outlined in the section below.

The consultation strategy should be signed off by the executive level sponsor, to ensure support and encourage participation across all levels of the organisation.

5.4.2 Select appropriate consultation methods

The appropriate consultation methods will vary across NSW public authorities, depending on size, location, nature of services and service users and the purpose of the consultation. Some options to consider include:

- large public meetings/community forums
- small group discussions/meetings
- interviews, either face to face or over the phone
- surveys, either online, via telephone or paper based
- written submissions, either online or paper based
- convening a steering group
- guest attendance at groups that meet regularly

For consultation opportunities aimed at maximising responses, a range of methods should be used to encourage participation including:

- newspaper, broadcast and online advertisements
- use of internal communications
- direct invitations

REMEMBER: Community consultation must be undertaken in the spirit of collaboration rather than an information briefing. Involve staff and the disability community early in the development of the Action Plan, taking steps to maximise participation at multiple consultation opportunities.

5.4.3 Decide who to engage

Working groups should determine those best placed to participate, with a focus on internal audiences, external stakeholders, service users and potential service users.

Internal audiences might include:

- front line/customer service staff
- staff whose role relates to access and inclusion
- managers
- members of the disability access or advisory committee
- staff with disability

External stakeholders might include:

- people with disability and their carers/families
- disability service providers
- disability peak bodies/advocacy organisations, taking care to represent the diversity of disability type

Service users should include both current and potential service users. The true value of consultation around barriers is the opportunity to talk to 'consumers' who are not currently accessing services but should be.

5.4.4 Ensure full accessibility

It is vital to remember the many barriers to participation in consultation. Individuals with disability may be excluded from participation if accessible formats or interpreters are not available.

A range of other economic, social and cultural barriers should also be considered.

REMEMBER: Seek additional advice on engagement with people with disability if required. FACS Disability Access and Inclusion and the Disability Council NSW can direct agencies to resources and contacts within key organisations.

Additional support or information is available via:

- Disability Inclusion line on 1800 782 306
- Email: NSWDIP@facs.nsw.gov.au
- Webpage: www.facs.nsw.gov.au/diap

Additional Resources - Consultation

The Australian Government has produced a guide to inclusive consultation for people with disability, [Inclusive Consultation: A practical guide to involving people with disabilities](#).

Meetings and Events Australia has produced a guide to organising accessible events, [Accessible Events: A guide for meeting and event organisers](#).

The International Association for Public Participation provides several resources regarding public participation at the Resources section of their [website](#).

[Privacy NSW](#) has produced advice regarding privacy and people with decision making disabilities, Best practice guide: Privacy and people with decision making disabilities.

The New South Wales Council of Social Services has produced a research [report](#) on improving public participation in NSW, Have your say – but how?

Urbis has prepared an accessible consultations guide, Accessibility considerations in hosting consultations see www.urbis.com.au/accessible-consultations

The Victorian Department of Human Services has produced a guide for inclusive consultation and communication with people with disability on their [website](#).

5.4.5 Report on the consultation

The DIA mandates that Disability Inclusion Action Plans should provide a summary of the consultation process undertaken in developing the plan and should outline:

- audiences/organisations involved in the consultation
- the methods utilised in the consultation process
- brief description of the timeline, from start to finish
- a summary of the influence the consultation had on the content and structure of the Action Plan
- plans for ongoing consultation

5.5 Undertake disability inclusion action planning

For disability inclusion action planning to be embedded as core business in NSW public authorities, it is critically important that action planning is integrated with existing planning cycles and processes to align the process with existing strategic priorities and achieve efficiencies where possible.

Specific actions, to be organised under the four key outcome areas (incorporating additional outcome areas if required), are to be determined based on the consultation process, the map of public authority functions, attention to whole of government actions and in consideration of the agency specific priorities and strategic plans.

For each action, the Disability Inclusion Action Plan must indicate the:

- outcome area
- action title and description
- aim and expected outcome
- target population or audience
- timeframe for action to be commenced/achieved
- individual/or area responsible
- resources
- specific and measurable indicators to assess performance
- reporting requirements

REMEMBER: Action Plans should include specific and measurable indicators of success for every action, avoiding the use of ambiguous timeframes, targets, indicators and responsibilities. A measurement and evaluation strategy is to be developed to ensure there is an evidence base for progress.

5.6 Develop risk mitigation strategy

Integral to strategic planning processes is a risk mitigation strategy – to identify risks in implementation and draft strategies to overcome these risks before they materialise.

Risks in implementation should be documented and strategies to mitigate determined. Staff and communities involved in the development of the Action Plan should be informed of the risk mitigation strategy, and asked to provide input before finalising.

The risk mitigation strategy should be overseen by the Disability Inclusion Action Plan lead officer or executive level sponsor, rather than the working group to promote a more objective appraisal of risks.

5.7 Prepare a monitoring and reporting strategy

To enable reporting on the success of implementation of Action Plans, a monitoring and reporting strategy outlining the specific and measurable actions must be developed, communicated, implemented and its progress tracked.

Regular monitoring of the Action Plan will enable public authorities to:

- amend their Action Plan to reflect achievements, and adapt and respond to new inclusion challenges
- redirect attention and resources to areas where changes prove difficult to achieve
- provide accurate and timely reporting
- meet their obligations under the DIA including how the Action Plan supports the goals of the NSW Disability Inclusion Plan

The working group should prepare the monitoring and reporting strategy at the time of drafting the Action Plan. Monitoring and evaluation must be considered during the planning process, to ensure actions are specific and measurable and appropriate data is collected.

See the Appendix for a suggested reporting structure.

In preparing the monitoring and evaluation strategy, working groups should:

- design a measurement and evaluation framework for the Action Plan, including identifying indicators for every action
- identify all data sources required to regularly report the progress against each action including developing strategies for additional data collection as required
- determine the frequency, format and responsibility for reporting on the indicators against each action in the plan and the arrangements for collating this data
- seek executive level approval and sign-off on the monitoring and evaluation strategy, to encourage support and commitment across the department

Section 12 of the DIA stipulates that public authorities in NSW include reporting on the implementation of their Action Plan in their Annual Reports, and as soon as is practicable forward a copy of the report to the minister. These will be tabled in a report to parliament regarding disability inclusion action planning and implementation annually.

REMEMBER: Ongoing engagement with those who are impacted by or benefit from actions in the Action Plan provides a valuable source of data and mechanism by which to judge efficacy.

5.8 Plan for continual engagement

The DIA requires public authorities to review their Disability Inclusion Action Plan every four years. The review of Action Plans should be approached in the spirit of continuous improvement.

REMEMBER: The Disability Inclusion Action Plan is a dynamic document regularly reviewed and improved, not a standalone document that is developed and shelved.

It is recommended at minimum, quarterly meetings of the working group are conducted to monitor progress, as well as a bi-annual internal review to adjust actions as required, and an annual review including elements of staff and community consultation to reassess actions and risk mitigation. A suggested work plan for continual engagement is listed below.

Embedding inclusion planning within the culture of the NSW Government through continual engagement is important. To begin achieving this significant cultural shift towards disability inclusion, the working group and other public authority staff and stakeholders should revisit the Action Plan and monitor progress as a standing item on management agendas.

REMEMBER: Disability awareness is at the core of the Disability Inclusion Action Plan. Training, particularly for frontline service delivery staff, regarding the importance of, and practical steps toward disability inclusion is crucial.

5.9 Publish your Action Plan

The DIA mandates that Disability Inclusion Action Plans prepared by public authorities in NSW must be readily available to the public. Action Plans should be easily accessed on websites that are W3C compliant (Web Content Accessibility Guidelines conformance level AA). This will allow assistive technology users to easily navigate and access information available on websites in formats pursuant to the W3C guidelines which include, Rich Text Format (RTF), Text and Word versions.

NSW public authorities must take steps to ensure their Action Plans are accessible and publish the option to obtain accessible formats. For example, using a minimum font size 12 in high contrast with the background and providing alternative formats such as audio, large print and easy English. A system should be in place so requests can be responded to.

Additionally, the DIA mandates that a public authority must give a copy to the Disability Council NSW and provide a report on the implementation of the Action Plan in their Annual Report. Whilst not mandatory, entities are

encouraged to lodge their plans with the Australian Human Rights Commission (AHRC) as they list and provide links to all plans it registers on its website.

5.10 Promote the Action Plan to staff and the community

Action Plans should be distributed internally within public authorities and an investment should be made into raising awareness of the Action Plan (or key actions within the plans) in a range of ways to be tailored by organisations. These methods might include:

- poster campaigns
- newsletters
- awards recognising individuals involved in achieving disability inclusion targets
- integration of the Action Plan in induction processes

REMEMBER: Use plain intentional English and design the Disability Inclusion Action Plan to be visually engaging and usable.

Action Plans should also be promoted in a range of ways externally, including using the website, existing external communications and the media as appropriate. NSW public authorities may also want to consider having the Action Plan available in summary format, limited to a few pages, for distribution to wider audiences. Summary documents should be in easy English and in accessible formats.

Regular updating of progress on the Action Plan's implementation is as important as its initial launch. Integrating disability inclusion into the core business of all public authorities in NSW is at the heart of disability inclusion planning. Some suggestions for regular updates on progress include:

- development of a dashboard, to report on high level progress against actions and key outcome areas
- case studies in print or through internal media, to communicate the impact the Action Plan is having on staff and service users
- including a standing item within internal communications regarding Action Plans progress

5.11 Evaluation

Disability Inclusion Action Plans are the mechanism to deliver on the intent and objectives of the DIA. To this end, FACS will develop a whole-of-government evaluation framework for reporting on the NSW Disability Inclusion Plan and Disability Inclusion Action Plans. Resources will be made available online.

REMEMBER: Under the DIA public authorities must include a report on the progress of their Disability Inclusion Action Plan in their Annual Report. An explanation of how the plan supports the goals of the NSW Disability Inclusion Plan and a summary of the consultation process undertaken in developing the plan must be provided. A copy of the Disability Inclusion Action Plan must be given to the Disability Council NSW and be publicly available.

5.12 Initial support

To support the development of disability inclusion action planning FACS will:

- conduct a range of whole of government planning workshops for staff involved in the development of Disability Inclusion Planning to support their processes
- develop resources to support the planning and implementation of the DIAP guidelines
- work with Planning NSW through the Office of Local Government and Local Government NSW to ensure that there is an alignment of the disability inclusion action planning and reporting process with the integrated planning and reporting processes for local government
- engage NSW disability peaks and other organisations and individuals, and invite their participation in the development of resources to support the process and their participation in working groups and other activities

Additional support or information is available via:

- Disability Inclusion line on 1800 782 306
- Email: NSWDIP@facs.nsw.gov.au
- Webpage: www.facs.nsw.gov.au/diap

6 Additional resources

6.1 Links and resources

Evidence base for disability inclusion

- Australian Bureau of Statistics collections on disability data are available [here](#).
- The NSW Public Service Commission has released a report detailing the employment situation of people with disability in the NSW public sector, Disabling the Barriers.
- The Australian Human Rights Commission overview of the history and aims of the Commonwealth Disability Discrimination Act 1992. A series of publications are available [here](#).

Physical access

Standards Australia has written the following standards for disability access to buildings:

- [AS 1428.1-2009](#) Design for access and mobility - General requirements for access to buildings
- [AS 1428.2-1992](#) Design for access and mobility - Enhanced and additional requirements - Buildings and facilities
- [AS 1428.3-1992](#) Design for access and mobility - Requirements for children and adolescents with physical disabilities
- [AS/NZS 1428.4.1:2009](#) Design for access and mobility - Means to assist the orientation of people with vision impairment - Tactile ground surface indicators
- [AS 1428.5-2010](#) Design for access and mobility - Communication for people who are deaf or hearing impaired

The Australian Human Rights Commission provides a range of resources on disability and access issues, including information about access to premises and other resources [website](#).

Vision Australia has developed a set of guidelines to improve access to public buildings by people with vision impairment which can be accessed [here](#).

The Australian Network on Disability website has information about evacuation procedures for people with disability which can be accessed [here](#).

Accessibility

The W3C Guidelines for website design are available [here](#).

[The Australian Human Rights Commission](#) also provides guidelines on accessible websites.

Vision Australia has produced a guide to adaptive technologies for people with vision impairment, which can be accessed [here](#).

Language

People with Disability Australia guide to language relating to disability which can be accessed [here](#).

Employment

The Australian Public Service Commission has produced a guide to including people with disability in the workplace: [Ability at Work, tapping the talent of people with disability](#).

The NSW Department of Family and Community Services publishes information about employing people with disability which can be accessed [here](#).

JobAccess supports the employment of people with disability by providing information and advice for people with disability and their employers, which can be accessed [here](#).

Disability Employment Australia has collated resources about how to ensure that a workplace is an inclusive and supportive environment for people with disability, which can be accessed [here](#).

6.2 Suggested reporting template

Action title	Description	Timeframe	Target	Performance	Comment
LIVEABLE COMMUNITIES					
EMPLOYMENT					
COMMUNITY ATTITUDES AND BEHAVIOURS					
SYSTEMS AND PROCESSES					
OTHER					

Additional templates and resources will be produced to assist public authorities to develop, and report on their inclusion plans.

7 References

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8 Abbreviations

ACTION PLANS – Disability Inclusion Action Plans

ADA – Anti-Discrimination Act 1977 (NSW)

AND – Australian Network on Disability

DAP – Disability Action Plan

DDA – Disability Discrimination Act 1992 (Commonwealth)

DIA – Disability Inclusion Act 2014 (NSW)

DSA – Disability Services Act 1993 (NSW)

FACS – Department of Family and Community Services

GSE – Government Sector Employment Act 2013 (NSW)

KPI – Key performance indicator

ICT – Information and communications technology

NDIS – National Disability Insurance Scheme

NDS – National Disability Strategy 2010-2020

NIIC – NSW Interdepartmental Implementation Committee

SDAC – Survey of Disability, Ageing and Carers

UNCRPD – United Nations Convention on the Rights of Persons with Disabilities