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# Executive Summary

## Introduction

Australia is currently undergoing a period of major reform in the disability sector. A key driver of this reform agenda is the National Disability Strategy 2010-2020 (NDS), developed by the Commonwealth, State and Territory governments following the 2008 ratification of the UN Convention on the Rights of Persons with Disabilities, and the 2009 report *Shut Out: The Experience of People with Disability and their Families in Australia*.

Both the New South Wales (NSW) *Disability Inclusion Act 2014* and the dedicated NSW Implementation Plan 2012-2014 (NSW Implementation Plan) of the NDS, highlight the Department of Family and Community Services’ (FACS) requirement to develop and distribute new Disability Inclusion Action Plan Guidelines (the Guidelines), to assist public authorities in NSW align their disability inclusion planning with the key policy areas of the NDS.

Disability Action Plans (DAP) established by the NSW *Disability Services Act 1993* will be repositioned as Disability Inclusion Action Plans (DIAPs) under the *Disability Inclusion Act*.[[1]](#footnote-1) The Guidelines will strongly reflect the major elements of the NDS, the National Disability Insurance Scheme (NDIS), the NSW Implementation Plan and the *Disability Inclusion Act*, Disability inclusion has progressed over the previous decade, as has the level of services provided to people with disability in NSW. The NSW Disability Inclusion Act 2014 begins the next stage of building a truly inclusive community through inclusive planning and coordination across all levels of government and across portfolios.

A DIAP needs to be both a statement of commitment by public authorities to inclusion and implementation of the NDS, while also functioning as practical plan setting out strategies to meet this commitment. The Guidelines must outline and support this dual role for DIAPs.

This research and analysis has been undertaken in anticipation and in consideration of the Disability Inclusion Act that was passed by NSW Parliament in August 2014. Detail and recommendations in this work have been formulated on the basis that the legislation will be passed with minimal changes to that which was tabled.

The research also notes the need to consider the current policy of outsourcing NSW government service delivery and the management of responsibility for disability planning during this transition.

## Research approach

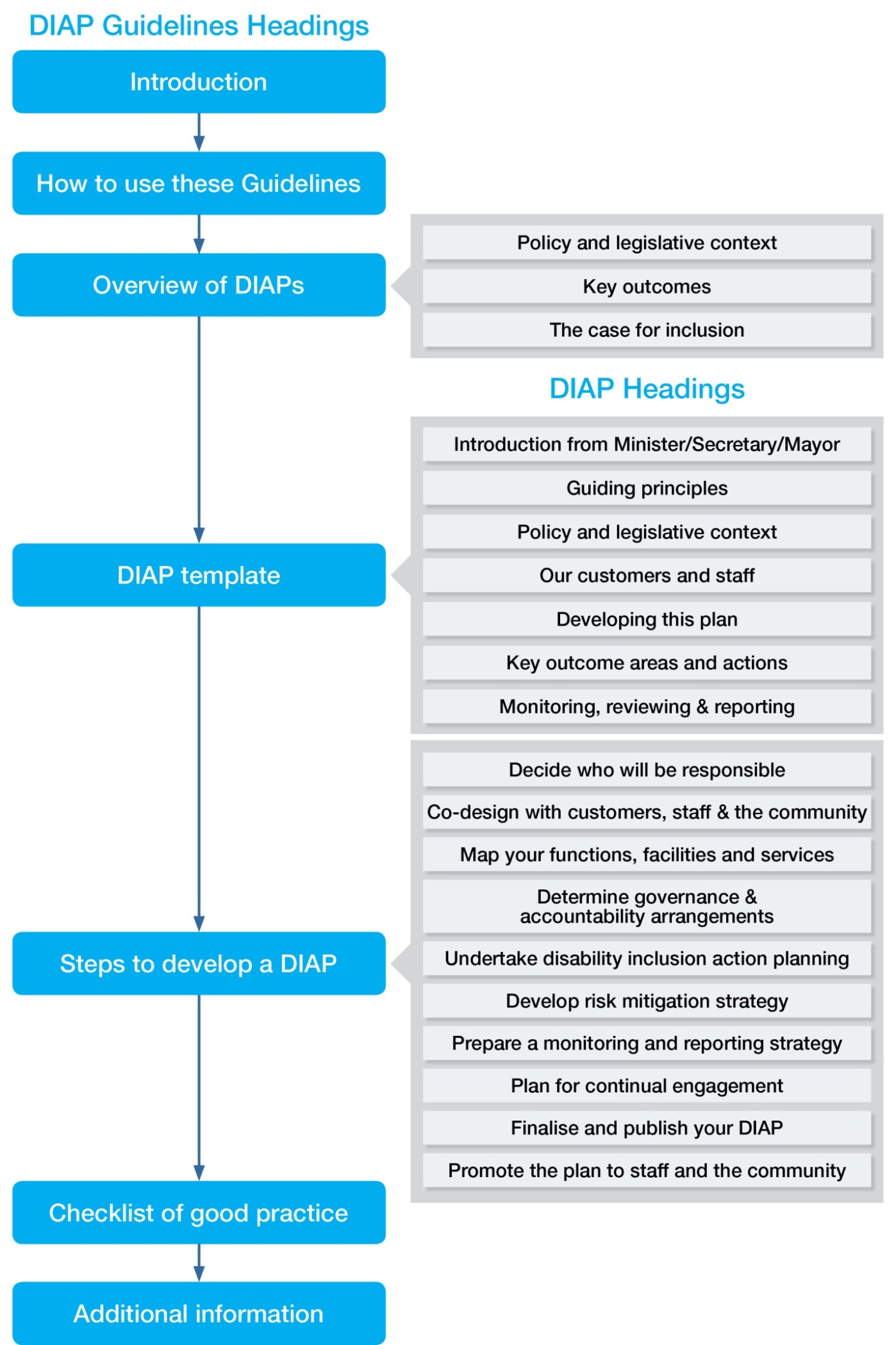
In May 2014, Urbis was commissioned by Carers Ageing and Disability Inclusion (CADI) in FACS to review the current DAP Guidelines, developed in 2008, in light of the current legislative and policy context, and to make strategic recommendations for creating a new set of DIAP Guidelines.

In order to develop these recommendations, the project involved:

* identification and review of DAPs, DAP Guidelines and other relevant resources, including:
* 20 NSW government DAPs
* 12 additional DAPs from other jurisdictions and the private sector
* eight sets of DAP Guidelines or similar documents
* four additional DAP relevant resources, including the Australian Human Rights Commission (AHRC) Guide for Disability Action Planning and the Community Relations Commission (CRC) Guide for Multicultural Planning
* a total of 28 stakeholder consultations including:
* eight sector representatives
* 18 NSW government representatives involved with DAP development and implementation
* two members of the private sector responsible for Plan development and implementation.

Stakeholder consultations were conducted either face to face or over the telephone between 15th May and 5th June 2014. Each interview lasted between 30 and 60 minutes and followed a semi-structured interview guide. A full list of stakeholders consulted can be found at Appendix A. The full list of DAPs, Guidelines, other resources reviewed can be found at Appendix B.

## Content recommendations for the DIAP Guidelines



## A guide to this report

This report contains four key sections:

1. Research Findings - Outlines the key findings of the DAP, DAP Guidelines and other resources review and the stakeholder consultations, including a short analysis of the contents of the DAPs reviewed, identifying examples of good practice throughout.
2. Context for the 2014 Guidelines - Identifies the key contextual drivers of change for disability inclusion action planning within the NSW public sector, which provide the conceptual framework for the revised Guidelines.
3. Content recommendations for the Guidelines - While Urbis has not been commissioned to draft the Guidelines, based on the research undertaken, we have prepared some recommendations for how the Guidelines might be structured and suggest key areas for content inclusion.
4. Next steps for drafting the 2014 Guidelines – A new set of Guidelines represents just one step in driving change in disability inclusion action planning within the NSW public sector. The final section describes key learnings gathered from the research in terms of effectively implementing reform in disability inclusion action planning and the role for the Guidelines within this broader program of change.

# Research findings

## Contextual factors

There are several factors in the Australian public sector generally, and the disability sector specifically, that are important to note as contextual influences as FACS prepares to rewrite the Disability Inclusion Action Plan (DIAP) Guidelines.

Australia is undergoing a period of substantial reform in the disability sector. The 2011 release of the NDS established a focus on a person-centred approach to service delivery, improving access to mainstream services for people with disability, and a mandate for inclusive planning across all levels of government. The 2013 introduction of the NDIS built on this person-centred approach, and is a fundamental change to the way specialist disability services are delivered. Once the full NDIS is in place, the NSW Government’s primary role in disability will be ensuring access and inclusion for people with disability across NSW Government mainstream services and the broader community.

This period of reform has coincided with other significant changes in the public sector. State governments across Australia are progressively shifting to a model of increased delivery of social services by the NGO sector. This means that DIAP planning will need to reflect the significant role that NGOs play in delivery and the need to reflect inclusion in contracting practices.

The significant structural changes within NSW government agencies and departments over recent years have created a period of uncertainty yet to be fully resolved. The cluster structure created a degree of confusion within some of the larger and more complex NSW government agencies regarding which public authorities are required to have a DAP, leading to a period of stalled planning.

Finally, there have been changes to workforce planning requirements for NSW government agencies under the Government Services Employment (GSE) Act 2013. Under the GSE Act, strategies for achieving diversity in the workplace are to be fully integrated with workforce planning across all government sector agencies, with a focus on established diversity groups including gender, Aboriginal people, people with a disability, and people from culturally and linguistically diverse backgrounds. It will be important for FACS to be mindful of potential duplication of planning and reporting requirements, to be careful not to overburden public authorities.

## Role and history of DAPS in NSW

### A short history of disability action planning in NSW

The requirement for disability action planning in NSW was established by Section 9 of the NSW *Disability Services Act 1993* (DSA) which made DAPs for NSW government agencies mandatory. The legislation did not prescribe the content of the DAPs, or provide guidance on how planning should take place except to set out requirements that the public have access to DAPs and for periodic reporting on progress in implementation. The first set of guidelines, the *NSW Disability Policy Framework and Guidelines* were released in 1998 which set out how agencies should plan, how often and reporting requirements. These guidelines also established the former Department of Ageing, Disability and Home Care (ADHC) as the custodian and coordinator of DAPs within NSW.

*Guidelines for disability action planning by NSW Government agencies* released in 2008 overhauled the original guidelines by addressing the blurring of policy intent between specialist disability objectives and objectives for the improved delivery of universal services to people with disability. The 2008 framework clearly set out three levels of planning for universal, adapted and specialist services.

### Drivers of change

Changes in the legislative and policy context are a major driver of change in disability action planning, and are detailed below at section 2.2.4. Stakeholders consulted noted two other major drivers for progress within disability action planning.

Related to the current policy context, is the economic imperative of inclusion and access. The sustainability of the NDIS depends on people with disability being able to access services including healthcare, public transport and education. Inclusion in the broader community, including employment, also helps to reduce dependence on specialist services.

Recent years have seen an increasingly active disability advocacy environment, via dedicated advocacy groups and active Advisory Committees/Employees with Disability Networks within public authorities. A total of 38% of all complaints to the Australian Human Rights Discrimination Commissioner in 2009-2010 related to disability discrimination, and there have been some high profile examples of successful disability discrimination litigation driven by advocates (AHRC - Annual Report 2009-2010: Complaint Statistics, 2010). This advocacy environment has reportedly driven increased emphasis on the need for meaningful and effective disability action planning.

### Current role of DAPs in NSW

Currently, DAPs are intended as a tool for improving access to services and improving service delivery within the public sector for people with disability, however most stakeholders report there is often a gap between the legislative intention and current practice.

There are several examples of NSW public authority DAPs developed in recent years that have genuinely driven improved access and service delivery, and acknowledged the human rights, social and economic imperatives of inclusion. However, several examples reviewed confirm the stakeholder perception that some public authorities in NSW have developed DAPs that meet a compliance requirement, rather than developing a genuine tool to improve service delivery and drive inclusion.

While the 2008 guidelines reportedly assisted some NSW public authorities reflect the policy agenda beyond access towards inclusion, the quality is variable depending on internal knowledge levels and varying levels of commitment. Departments operating under a Federal Standards imperative, such as Transport for NSW and Department of Education and Communities, were often viewed as more progressive given the Federal imperative and potentially punitive role of Standards.

The stalled DAP process in some NSW public authorities due to structural change is expected to draw to a close with the passage of the Disability Inclusion Act and the release of the 2014 Guidelines. NSW government agencies are anticipating a new period of planning, but require clear guidance on who should plan, how often and key focus areas first. Among local government, the quality of DAPs, to be developed as part of the Integrated Planning and Reporting framework, is also highly variable according to stakeholders in the sector.

Within the private sector there are some examples of good practice in disability access and inclusion planning, often leading with a strong business case for inclusion with regard to broadening a potential customer base and accessing a wider range of talent via employment inclusion.

### Current and future legislative and policy context for disability planning in NSW

A number of legislative instruments and policy commitments underpin disability action planning in NSW.

At a national level, the UN Convention on the Rights of Persons with Disabilities was ratified by the Commonwealth and all State and Territory governments in 2008, signifying a commitment by member states to abolish obstacles faced by people with disability. Following the release of *Shut Out: The Experience of People with Disability and their Families in Australia,* the Federal Government releasedthe NDS. Together, these commitments have driven a reform agenda designed to create a community wide shift in attitudes to look beyond disability and issues of physical access, and begin a period of inclusive planning for people with disability requiring coordination across all levels of government and across portfolios. This builds on the Commonwealth Disability Discrimination Act 1992 (DDA) which recognises the rights of people with disability to equality before the law and makes discrimination based on disability unlawful.

In the NSW context, the NSW Implementation Plan 2012-2014 and the Disability Inclusion Act 2014 (replacing the *Disability Services Act 1993*) form the foundation of disability access and inclusion policy. The Disability Inclusion Act provides the basis for how NSW will deliver services, supports and protection as the system evolves to incorporate the NDIS. The Act

is strongly focused on choice and control and outlines a new definition of disability:

**disability**, in relation to a person includes a long-term physical, psychiatric, intellectual or sensory impairment that, in interaction with various barriers, may hinder the person's full and effective participation in the community on an equal basis with others.

Disability Inclusion Act 2014, Part 1, Division 3, Section 7

The Disability Inclusion Act outlines the requirement for a State Disability Inclusion Plan, and Part 2, Sections 12-14 of the Act state the requirement for NSW public authorities to have a DIAP setting out the measures they will employ to ensure people with disability can access services and fully participate in the community. The Disability Inclusion Act is prescriptive regarding some content, reporting, review and timing requirements. These legislative requirements are reflected in Section 4 - Content recommendations for the DIAP Guidelines.

## Facilitators and barriers to quality DAP development and implementation

### Facilitators

The most commonly cited facilitator of good disability action planning development and implementation was a **strong level of integration with existing planning processes**. By aligning the disability action planning process with core business, disability planning shifts from the margin into the mainstream.

Stakeholders discussed three main approaches to achieving this integration.

NSW government agencies that report a high level of integration of disability planning with core business tend to achieve it through engaging senior leadership within every service area. To attain this level of senior engagement, stakeholders reflected on the need to include service area leaders early in the DAP development process, and continue to engage through implementation by involving service area leaders in the ongoing DAP working group/Advisory Committee or similar.

Within local Councils, disability action planning has been integrated into core business as part of the mandated Integrated Planning and Reporting framework under the *Local Government Amendment (Planning and Reporting) Act 2009*. The guidelines and manual for the Integrated Planning and Reporting framework contains advice regarding consultation, priority setting, measurement and reporting which have been applied to DAP development.

In the private sector, disability action planning tends to be framed as a strong business case, rather than an element of good corporate citizenship. Sector representatives particularly involved with disability action planning in the private sector spoke of seeing a genuine focus on inclusion planning as a business improvement process, driven by a compelling argument to widen their potential customer base and broaden the talent pool of employees. Critical to this business case frame was the existence of good data to support the case and governance structures that embed inclusion planning throughout an organisation.

As long as you have a standalone plan, it will be a special plan for special people and not fully integrated. It should be just part of how we integrate all planning, part of the landscape of planning thinking about any issue.

NSW Government Stakeholder

Also critical to the development and implementation of strong DAPs are **strong internal champions**, ideally among senior leadership. Organisations in the public and private sector who reported having Plans that had driven real change, nearly always reported having very senior internal disability champions, who supported the planning process as part of a broader disability inclusion agenda.

It's very difficult, if there's not a very senior person driving the process, to filter this thinking into the organisational culture.

NSW Government Stakeholder

Closely linked to the need for strong, senior internal champions to drive the importance of DAPs throughout an organisation is the need for **governance structures that position disability action planning as a high priority**. Best practice examples of governance structures that support successful DAP development and implementation are those that link achievement of DAP targets to the key performance indicators (KPIs) of senior managers from every service area. While stakeholders reported the lack of a dedicated resource, such as a Diversity or Disability Policy Officer, as a barrier to developing and implementing strong plans, embedding disability planning goals within the core job description and evaluation framework for senior managers across an organisation was also seen as fundamental to successful DAPs.

Governance and accountability structures should help Executives across business functions know their role and understand their responsibilities with regard to disability planning.

Sector representative

**Genuine consultation** with the disability community and disability sector is also a key facilitator of strong disability action planning. Stakeholders discussed a number of key features of good consultation, including:

* include people with disability, their guardians, carers, families and advocacy groups in the consultation process
* provide an opportunity for people within the organisation to engage with the disability community for example through guest speakers, training, development workshops
* involve the disability community and disability sector, via a working group/Advisory Committee, early in the DAP development process - in the spirit of co-design, rather than information briefing
* ensure consultation includes representation of a wide range of disability types, including physical and intellectual disability
* notify those consulted of the outcome of their input/recommendations
* provide accessible and inclusive environments for consultation.

I like that saying, 'Nothing about us, without us' - that should guide consultation practices.

NSW Government Stakeholder

There is a need for support in the DAP development and implementation process. Stakeholders reported strong value in **opportunities to share ideas and experiences** with other public authorities regarding disability action planning. Forums serve to prevent 'reinventing the wheel' with regard to DAP content, but also provide an opportunity to build on each other's ideas and potentially collaborate in a regional or service delivery setting. The NSW Interdepartmental Implementation Committee (NIIC) was generally viewed as a very useful platform for improving disability action planning within NSW Government.

The Disability Council NSW is also a valuable source of advice in developing and implementing Plans. Several stakeholders reported the Council and in some cases FACS, playing an effective role as sounding board for planning ideas and as a reviewer of draft plans.

There are capacity issues in some Departments, so some level of hand-holding is useful.

NSW Government Stakeholder

### Barriers

The key barrier to undertaking effective disability action planning raised by stakeholders was the broader **cultural change challenge around inclusion** - to make an attitudinal shift toward inclusion planning as a part of core business and embed inclusion within all planning processes, not just the DAP. Stakeholders cited a number of characteristics of organisations facing challenges with regard to cultural change, including:

* lack of will and enthusiasm for quality disability action planning among senior leadership
* disability action planning contained within the HR function of a Department/Agency/Council, rather than embedded throughout the an organisation, resulting in the Plan and its actions being sidelined
* perception and treatment of DAPs as a compliance measure
* acceptance of low expectations and/or ambiguity in DAPs, to avoid accountability for actions.

The single hardest thing in this space is attitudes, we need practical tips on how to change this internally.

NSW Government Stakeholder

There is an incredible sameness about some of them. They tend to support the status quo.

Sector representative

Developing and implementing high quality DAPs was seen as a multi-disciplinary task, requiring a range of knowledge and skills across community consultation, strategic and operational planning, measurement, communications development and organisational change. Some stakeholders reported **significant knowledge and capacity gaps** within public authorities. Where these knowledge and capacity gaps exist, it is very difficult to achieve quality DAP outcomes.

Not every area of Government has people skilled in engaging with people with disability.

NSW Government Stakeholder

Closely related to the cultural shift required to prioritise disability action planning within NSW government agencies is a perceived **lack of resources** among some. A dedicated resource such as a Diversity or Disability Policy Officer, as well as additional people resources and capital investment to assist with development and implementation of DAPs was seen as critical to success. Given the focus on disability inclusion action planning in the Disability Inclusion Act, a number of stakeholders said that committing adequate resources was essential.

You really need to have someone in a dedicated role, to drive it and take ownership.

NSW Government Stakeholder

The last few years have delivered **significant structural change within NSW Government** and this change has brought about confusion as to which public authorities are required to have a DAP and which Departments/Agencies are currently covered by an existing DAP. There is a perception among some stakeholders that in some parts of NSW government this uncertainty has resulted in disability action planning falling off the agenda. Having said this, all stakeholders acknowledged the Disability Inclusion Act will bring about a new focus on disability action planning and are preparing for a period of renewed focus.

It's unclear what cluster we belong to at the moment, so we don't have a current DAP.

NSW Government Stakeholder

Connected to the challenge associated with structural change is the difficulty in developing DAPs that are **specific enough to be meaningful and enable real change**, while being general enough to apply to an entire Department/cluster. Section 12 of the Disability Inclusion Act states "each public authority must...have a plan (DIAP)", however several stakeholders acknowledged the need for overarching Departmental DAPs while also providing flexibility for individual authorities to develop DAPs specific to their operating context.

I think we need direction for the level of agency planning. In an agency of our size you can waste tons of time debating where this lives, who needs to do what.

NSW Government Stakeholder

There is a strong perception within some NSW Government agencies that the **reporting required** on DAPs has not been well utilised, with some stakeholders expressing the view that mandated reporting feels like reporting for reporting's sake. This perception drives the positioning of DAPs as a compliance measure and is a hindrance to achieving positive cultural change around inclusion.

We'd rather do something, than report on it.

NSW Government Stakeholder

## Analysis of existing DAP content

As outlined at section 1.2, a total of 20 NSW Government DAPs, 12 Plans from other jurisdictions and the private sector, eight sets of Guidelines or similar documents and four additional resources were reviewed and the content analysed using an analysis frame.

### What constitutes good practice

In conducting the review of DAPs, Guidelines and other resources, examples of good practice DAPs were generally identified based on one or both of the following:

* a strong public statement of commitment to inclusion planning
* a high level of operational detail.

Public statement of commitment

A small number of DAPs reviewed clearly demonstrated a high level of organisational engagement with and commitment to disability inclusion planning through the public statement of commitment. The commitment tended to be outlined in an introductory letter/section signed by a CEO/Secretary/Director General/Mayor and further reinforced through a Statement of Vision, set of Guiding Principles or similar section.

Good practice DAPs tended to use these sections within the DAP or Plan to refer to the organisation's philosophical underpinnings for inclusion planning, the more progressive of which explicitly refer to the social model of disability and the compelling business case for inclusion and diversity planning, rather than approaching disability planning in terms of physical access.

Furthermore, DAPs demonstrating a strong and convincing public statement of commitment tended to use a different tone to other less progressive DAPs, to clearly make disability inclusion planning central the organisation's fabric - often explicitly stating the organisation sees a human rights, social and economic imperative to develop inclusive planning practices.

The Transport for NSW 2012-2017 DAP contains an Introduction, list of Strategic Objectives and section outlining a set of Guiding Principles, which all serve to clearly state the intention and spirit of the Plan. The reader is conveyed a strong sense of engagement and commitment from the Department.

The University of Sydney 2013-2018 DAP states the University's strong desire to be a world leader in social and economic participation for people with disability and lists six key objectives elevating a rights based approach above that of physical access.

High level of operational detail

DAPs containing a high level of operational detail in the action planning, particularly around targets, indicators, timeframes, responsibilities and investment to achieve actions, also tended to be examples of good practice in the sector. This high level of operational planning detail is evidence of a strong internal investment in the planning process, as well as a detailed measurement and accountabilities framework, another signal of strong internal commitment. For agencies with many and varied operations, to provide this high level of operational detail often required multiple tailored DAPs.

The NSW Ombudsman 2010-2014 DAP contains a high level of detail regarding timeframes, responsibilities and performance indicators against each action in the Plan.

### Public sector

There was a high level of variability among the 24 public sector DAPs reviewed, including 20 from NSW. While some DAPs demonstrated a strong level of engagement and commitment to the process and outcomes of disability action planning, some documents reviewed conveyed a compliance based approach to the task.

In general, public authorities operating in a Federal Standards environment, such as Transport for NSW and the Department of Education and Communities, tended to have more progressive DAPs given the Standards imperative imposed upon them.

The following summary does not attempt to outline and analyse the content of specific actions, instead focusing on the style of content and identifying examples of good practice. Importantly, the sample is not representative of the sector given several DAPS were reviewed after being identified as examples of good practice by stakeholders.

Introduction / Foreword / Vision

Most public sector DAPs reviewed began with a letter from the relevant Secretary / Minister / CEO / Commissioner / Mayor stating the public authority’s commitment to disability action planning, followed by an Introduction and/or Statement of Vision. Within these introductory sections, there was a great deal of variation.

In many of the strongest DAPs reviewed, these introductory sections explored in some detail the philosophical underpinning of inclusion planning, often referencing the social model of disability as a new way of approaching disability planning. These examples of best practice also commonly included a commitment that inclusion is part of the public authority’s core business, and cited the business case for inclusion, focused on increasing the customer base and/or broadening the talent pool of employees. Several of the DAPs identified by stakeholders as examples of good practice also included a 'Guiding Principles' section, allowing the organisation to make a strong commitment to the principles of inclusion and inclusive planning.

The City of Sydney Inclusion (Disability) Action Plan 2014-2017 addresses the social, economic and physical aspects of inclusion the City is committed to addressing in an opening Message from the Lord Mayor.

Weaker examples of DAPs refer to the compliance environment in their opening sections. These examples tend to open with a statement of the legislative requirement, note their compliance in terms of submission of the Plan to FACS and in some cases the Australian Human Rights Commission, and refer to a legislative definition of disability rather than reflecting on what disability might mean given the specific Department/Agency/Council context.

Overview of agency function including profile of staff and customers with disability

The 2008 Guidelines recommend DAPs include a review of operations and activities to identify and prioritise areas for action planning, and also develop a customer and stakeholder profile to profile employees, service users and potential service users with disability in order to plan appropriately. An overview of agency function including a profile of staff and customers with a disability is an important foundation to outlining a business case for inclusion.

The DAPs reviewed generally provided very little detail for these two content areas, with some omitting both entirely. Most overview of agency operations comprised a few sentences describing an agency's core function, while the majority of DAPs reviewed included a general population profile of disability in NSW sourced from the Australian Bureau of Statistics (ABS), rather than attempting to filter this profile according to an agency's specific function and/or customer base. An exception to this trend was among DAPs pertaining to a specific geography such as local area health services or local councils, who often profiled data based on their region.

The Rockdale Shire Council's Disability Action Plan 2012 profiles the local population with disability in some detail, and analyses the local data to note increased likelihood of other characteristics such as increased unemployment or incarceration rates. This level of analysis begins to present a business case for inclusion, although does not use this language.

Legislative and policy context

Nearly all DAPs reviewed provided the necessary legislative and policy context underpinning the planning process. Examples of good practice went beyond naming the legislation and policy instruments driving the DAP process, but reflected on the importance of the policy context and the imperative for change.

While a focus on the legislative context in particular does encourage a tone of compliance rather than commitment, most stakeholders felt the regulatory requirement for developing and publishing DAPs remains an important tool for change.

Evidence of integration with existing planning processes / internal resourcing

As evidence of commitment to integrating disability action planning into the organisational function, some public authorities explicitly stated the alignment of existing planning cycles with the disability action planning process.

Local Councils are required by law to integrate DAP planning into their Integrated Planning and Reporting framework.

The State Library of NSW's 2010-2014 DAP acknowledges the important link between disability action planning and the overarching strategic goals for the Library, one of which is 'equity and access'.

DAPs singled out as examples of good practice often provided a high level of detail regarding the resourcing of the DAP in development and implementation stages. This included the resourcing of the role dedicated to developing and implementing the DAP or Plan and the membership of an ongoing working group/ Advisory Committee responsible for implementation and review.

Alignment with 2008 Guidelines outcome areas

Nearly all NSW Government DAPs (excluding local Councils) reviewed utilised the seven outcome areas listed in the 2008 Guidelines to structure their action plan. For those public authorities that did not refer to the outcome areas, some acknowledged a more relevant set of outcomes for their particular operating environment, while others made no reference to outcome areas contained in the Guidelines. Local councils tended to use their own key outcome or priority areas, aligned to their overall strategic planning processes.

Consultation

Of all content areas contained within the DAPs reviewed, the most variation in the level of detail provided, and presumably by extension the level of investment made, was in relation to consultation.

A small number of DAPs made no mention of the consultation undertaken with the disability community, staff and the sector in developing the DAP, others made brief reference to undergoing a process of internal and/or external consultation to develop the DAP and others provided detailed descriptions of the initial and ongoing consultation processes.

The examples of good practice in relation to detailing the consultation process often described a staged process of engaging the disability community (noting the requirement to include a cross-section of different disability types), conducting workshops with staff, seeking advice from the sector via peak bodies, and listed organisations consulted with outcomes. These DAPs often included the strategy for ongoing consultation as part of the annual review process.

The Sydney Opera House's 2009-2012 Access Strategic Plan, while heavily focused on physical access, details the consultation process including working with an external consultant, conducting workshops with staff and peak bodies representing a range of disability types, listing the organisations consulted and summarising the outcomes.

Monitoring and review

DAPs that seemed to constitute a compliance measure rather than a genuine commitment to inclusion tended to simply note the compliance requirement that the plan would be reported on annually and regularly monitored. These DAPs tended to include little detail or were ambiguous around the targets, timeframes, responsibilities and performance indicators against each action listed.

On the other hand, DAPs that demonstrated a strong commitment to improved access and service delivery for people with disability provided extensive detail regarding governance and accountability for Plan implementation, and a high level of operational detail regarding targets, timeframes, responsibilities and performance indicators against each action listed.

Blacktown City Council's 2012-2015 DAP details strong governance and accountability structures including the Access Advisory (Disability) Committee as a recognised sub-Committee of Council, with members appointed by Council, quarterly reporting and detailed targets.

### Private sector

The sample of nine Plans reviewed from the private sector is not representative of the sector. Disability action, inclusion or diversity planning is voluntary in the private sector and tends to be undertaken by organisations with a large customer base and workforce, such as banks, where there is a strong business case for doing so, as well as by organisations seeking to be employers of choice by demonstrating a commitment to diversity and inclusion. The sample was primarily selected based on stakeholders’ suggestions of good practice examples.

Executive summary / Introduction from the CEO

Many of the organisations included in the review took different approaches to the opening section of their Plans, while still achieving an impactful demonstration of commitment to inclusion planning.

Some organisations used the opening section/s to strongly develop a compelling business case for inclusion planning, providing an economic rationale for greater inclusion of customers and staff with disability, while others used the CEO's introduction to focus on the social and moral imperative associated with inclusion planning.

Westpac's Accessibility Action Plan 2013 opens with a snapshot of the business case for inclusion, called Fast Facts, to firmly anchor the Plan with an economic rationale, followed by an introduction from the CEO introducing the four key focus areas.

Overview of organisation including profile of staff and customers with disability

Private sector plans tended not to outline the organisational function but focus instead on the argument for inclusion planning based on a profile of staff and customers with disability.

The Commonwealth Bank of Australia's Disability Action Plan 2012 contains several case studies of staff and customers who have benefited from previous actions, bringing to life the impact on individuals of the Plan.

Internal resourcing / governance structures

Perhaps the strongest point of differentiation between public DAPs and private sector Plans is the governance and accountability structures in place. Many of the examples from the private sector that report achieving real cultural shift towards inclusion, did so by putting in place governance structures that position inclusion as central to an organisation’s core business and involving the Chief Executive Officer, Chief Operating Officer or other relevant senior level staff in order to lead from the top.

Private sector Plans also detailed the establishment of active employee disability networks.

Westpac's Accessibility Action Plan 2013 is sponsored by the Chief Operating Officer, who also served as head of the ABLE Employee Action Group, a group of staff and customers who advocate for improved access and service delivery.

Consultation

There were several examples of good practice in relation to consultation among the private sector Plans reviewed. Nearly all private sector organisation representatives we spoke to reported consulting with the Australian Network on Disability (AND) in the development of their Plan, who guided them in relation to consultation practices.

Several of the Plans detailed an extensive internal consultation process with staff with and without disability, as well as involving a wide range of peak bodies representing a range of disability types, and often engaging the services of organisations like AND or guest speakers such as Graham Innes, the former Commissioner for Disability Discrimination, to engage and educate staff throughout the consultation process. Most private sector Plans reviewed also had an ongoing group of staff with disability to provide ongoing consultation.

The Commonwealth Bank of Australia's Disability Action Plan 2012 was developed following an extensive consultation process including a workshop for senior staff from every business unit featuring guest speakers from AND and the Australian Human Rights Commission (AHRC) to provide context around the business case for inclusion planning, the next workshop involved brainstorming action with this group aligned to the Bank’s strategic areas and finally an extensive process of external consultation took place including various advocacy groups.

A number of private sector Plans demonstrated a strong commitment to data collection in order to inform the development of Plans. Surveys of staff and customers in addition to qualitative consultation practices were used as tools to assist with Plan development and monitoring success.

The University of Sydney’s 2013-2018 DAP describes the conduct of an annual survey of staff and students to capture data for planning purposes and monitoring success against goals.

Monitoring and review

Despite disability action planning being voluntary in the private sector, most Plans detailed a monitoring and review system, with more regular review and reporting than the mandated annual reporting in the public sector. Many Plans described quarterly reporting requirements to the Senior Management Group/Steering Committee, as well as annual or bi-annual review of Plans to adjust actions as required.

Westpac's Accessibility Action Plan 2013 benchmarks the Bank’s performance against global best practice measures of accessibility.

### The NGO sector

This review did not include any Plans from the community sector. A number of stakeholders indicated they believe the community sector is lagging behind the private and public sectors in disability action planning.

Given the strong move towards outsourcing service delivery to the NGO sector in NSW and elsewhere in Australia, this raises a question regarding legislative responsibility for NGO services funded by NSW government, and a potential risk for realising the vision for DIAPs and the NSW Implementation Plan more broadly.

### Guidelines and other resources

We reviewed nine sets of guidelines or similar documents from other jurisdictions across Australia and internationally, as well as four other resources that stakeholders recommended may be useful in revising the Guidelines.

The 2008 Guidelines from NSW, as well as the examples from Victoria (VIC) and Western Australia (WA) all represented highly useable, informative instruction manuals. Useful approaches gathered from these and other examples have informed Section 4, the content recommendations for updating the Guidelines.

Key areas of good practice that may be applied to revise the NSW Guidelines included:

* **vision** – the VIC Guidelines *aDAPting to Disability,* contain an introductory section that outlines a powerful argument for inclusion based on a social disability frame and presents a strong business case for inclusion.
* **case studies** – many of the other resources reviewed effectively used case studies / listed points of good practice to assist with DAP development.
* **formats** –the WA Guidelines provide a factsheet for each key element of Disability Access and Inclusion Plans, potentially increasing the usability and reach of the Guidelines.
* **reporting** – the Commonwealth and WA Guidelines both provide a useful reporting template, including detailed advice on monitoring and evaluation strategies.
* **Equality Impact Assessment** – The UK Guidelines, now superseded due to legislative change, outlined a requirement for Equality Impact Assessment in planning to identify and prioritise actions, and measure impact.

## Perceptions of the 2008 guidelines

In general, the feeling among stakeholders familiar with the 2008 Guidelines was that they were a useful document and in particular, the seven outcome areas were seen as meaningful areas for change and represented a useful structure for planning. However, many stakeholders questioned the ongoing relevance of these seven outcome areas given the introduction of the NDS and NSW Implementation Plan since the publication of the 2008 Guidelines. While the seven outcome areas had strong support from stakeholders, there was a strong call for the new Guidelines to use the **NDS outcome areas,** to avoid over-complication and enhance integration with State and Federal planning, implementation and reporting.

The 2008 Guidelines place strong emphasis on the three levels of planning (levels 1, 2 & 3) and types of service delivery (universal, adapted and specialist services) to help DAP authors determine areas of responsibility and prioritise actions. The service delivery structure was viewed as largely outdated given its origins in the *Better Together: A New Direction to Make NSW Government Services Work Better for People with a Disability and their Families*, a key NSW policy direction that has now been replaced by the NSW Implementation Plan. The levels of planning were also seen as potentially outdated given the new policy context, and overly tactical given the system-wide shift towards providing access to mainstream services for people with disability.

Stakeholders identified a number of areas for improvement in the 2008 Guidelines, requesting more detail and support with regard to consultation and recommended governance and accountability structures. A small number of stakeholders did describe the Guidelines as overly prescriptive and inflexible, noting the difficulty outlined at section 2.3.2 with regard to balancing content that is specific enough to be meaningful but general enough to be applicable to a public authority.

The resources are not the issue, from memory, they were fine and clear and helpful, but they have to be pretty broad, which for some agencies means very broad.

NSW Government Stakeholder

Many stakeholders also mentioned good DAPs from other public authorities, the Public Service Commission-led whole of government EmployAbility strategy, the NSW Implementation Plan and advice from the Disability Council NSW as useful when developing DAPs.

## DIAPs in the new era of planning for inclusion

Stakeholders see DIAPs as potential agents of change in the current environment of disability reform. All stakeholders supported the name change from disability action plans to DIAPs, with many noting the symbolic importance of language as a reflection of the current reform agenda.

Most stakeholders agreed DIAPs should play dual roles in the NSW public sector: as a positioning tool to make a public statement of commitment to implementing public authority responsibilities under the NSW Implementation Plan; and as an internal plan for improving access and service delivery for people with disability to public sector services in NSW.

Almost all stakeholders did acknowledge that DIAPs are only one piece of the cultural change challenge within NSW to achieve truly inclusive planning for the benefit of people with disability. In particular, stakeholders discussed the need for large scale investment in training of frontline staff, to be more aware of suitable service delivery for people with disability and their families.

I heard a story of a man who can't catch a bus because the bus driver never waits for him to sit down first, and he has no balance. Now if that driver was educated, we open up public transport to a section of the population who are currently excluded.

NSW Government Stakeholder

## The role for FACS in DIAP development and implementation

All stakeholders were supportive of an increased role for the Disability Council NSW in DIAP development and many also suggested an increased role for FACS in supporting the NSW public sector in developing and implementing DIAPs.

Several suggestions were made regarding the potential role for FACS, including:

* having FACS Regional Offices perform a regional facilitation role, to enhance coordination on a geographical basis
* as a training provider for public authorities, to assist with DIAP development and implementation (most stakeholders were unaware of training delivered in 2008)
* as a help desk for public authorities developing DAPs (most stakeholders were unaware of the dedicated email and phoneline for support offered in 2008)
* as a custodian of data to help public authorities develop their business case for inclusion
* as an enforcer of DIAP commitments.

Despite acknowledging the important role for FACS and DIAPs in achieving cultural change within NSW, stakeholders also noted the limited power of DIAPs to achieve this shift without additional investment in training of frontline staff and strong support from the highest levels of government.

# Context for the 2014 DIAP Guidelines

As outlined at section 2.1, NSW is undergoing a paradigm shift with regard to disability inclusion action planning. The following outline the critical factors which set the scene for revising the NSW Disability Inclusion Action Plan (DIAP) Guidelines.

## From compliance to inclusion

The name change from Disability Action Plans in the *Disability Services Act 1993* to DIAPs in the *Disability Inclusion Bill in 2014* is a symbolic indicator of a much more fundamental change taking place in both the public and private sectors in Australia regarding planning for greater inclusion of people with disability.

Where compliance has traditionally been associated with physical access, meeting Federal and other standards, and litigation avoidance, inclusion is driving a focus on the social and economic imperatives of this shift, best practice rather than only meeting standards, and an integration with diversity as a catch-all for a number of marginalised groups beyond people with disability.

This move from compliance to inclusion is acknowledged as underway by many stakeholders, led in the public sector by legislative and policy change, while the private sector tends to focus on the business case for inclusion. However, there is still an enormous degree of variability within the public and private sectors, making explicit communication of the philosophical shift important for public authorities still operating within a compliance frame.

## The NDIS and choice and control

The attitudinal shift towards inclusion is based on the social model of disability - an approach that recognises disability as socially constructed - officially recognised as the way to view disability by the UN Convention of the Rights of Persons with Disabilities.

Following Australia’s ratification of the UN Convention in 2008, the social model of disability has also driven the philosophical underpinning of major legislative and policy reform in Australia and NSW. The NDIS in particular represents a move to a model where people with disability are able to exercise choice and control over the services they access, as opposed to a welfare based prescriptive care model.

A major outcome of the NDIS will be the increased usage of mainstream services by people with disability, further driving the inclusion agenda across Australia. Specifically, the Productivity Commission has proposed the NDIS be structured into three tiers:

* Tier 1 – Public awareness and general information for all Australians, to minimise the impact of disability by supporting the integration of mainstream and other services.
* Tier 2 – Information, linkages and capacity building to better link people with disability to mainstream supports, and assist services to be more inclusive and responsive to the needs of people with disability. It is expected these services will mainly be health and education related, although specific detail regarding the division of Tier 2 services to be addressed by State and Commonwealth agreements is yet to be clarified.
* Tier 3 – Individually funded packages for 410,000 Australians with disability to access specialised supports.

The NDIS has served to galvanise momentum and attention within the public sector around inclusion, although some stakeholders did note the uncertainty around the NDIS with the change of Government at a Federal level has undermined progress.

## Inclusion as core business

While there is commitment to the social imperative of the NDIS at every level of Government in Australia, another major driver of the NDIS is the economic incentive. The NDIS is projected to add more than $50 billion to Australia’s GDP by 2050 through increased employment participation and other savings (PricewaterhouseCoopers, 2011). These fiscal gains associated with greater inclusion are driving an increased focus in the public and private sectors on the business case for inclusion.

In order to make this shift towards communicating the business argument for inclusion, there are potentially some capacity gaps in the public sector. Strong business cases require robust data on the profile of staff, users and potential users with disability, the economic costs associated with inclusion and exclusion from mainstream services, and the provision of specialist or adapted services. The review of public sector DAPs conducted revealed gaps in relation to data collection and analysis. There is potentially a role for FACS or other partners to provide advice regarding data collection and analysis to support the move towards constructing the argument for inclusion.

## The importance of tone and language

Tone and language have an important role to play in the Guidelines, to support the reforms underway. These elements will firmly position the Guidelines as a tool to push DIAPs into the new era of inclusion planning, and away from being seen as a compliance measure.

In order to create an example, the Guidelines should observe these recommendations also.

Specifically, stakeholders discussed the importance of the following:

* using positive language to describe a person and their abilities, and never defining a person by their disability
* acknowledging many barriers for people with disability are created by the community and/or physical accessibility
* when describing people with disability, always put the person first
* clearly articulating that access does not mean physical access only
* using the language of inclusion and diversity
* applying the frame of the social, economic and rights imperative of inclusion and DIAPs specifically
* being mindful of the word ‘services’, as it can convey a sense of segregation / difference of people with disability
* in the context of a focus on choice and control under the NDIS, the words ‘care’ and ‘care for’ have become associated with the medical model of disability

The WA Guidelines for Disability Access and Inclusion Plans contain a factsheet titled ‘Putting People First - Disability and Appropriate Language’. This is a useful guide outlining words to use and words to avoid when describing disability.

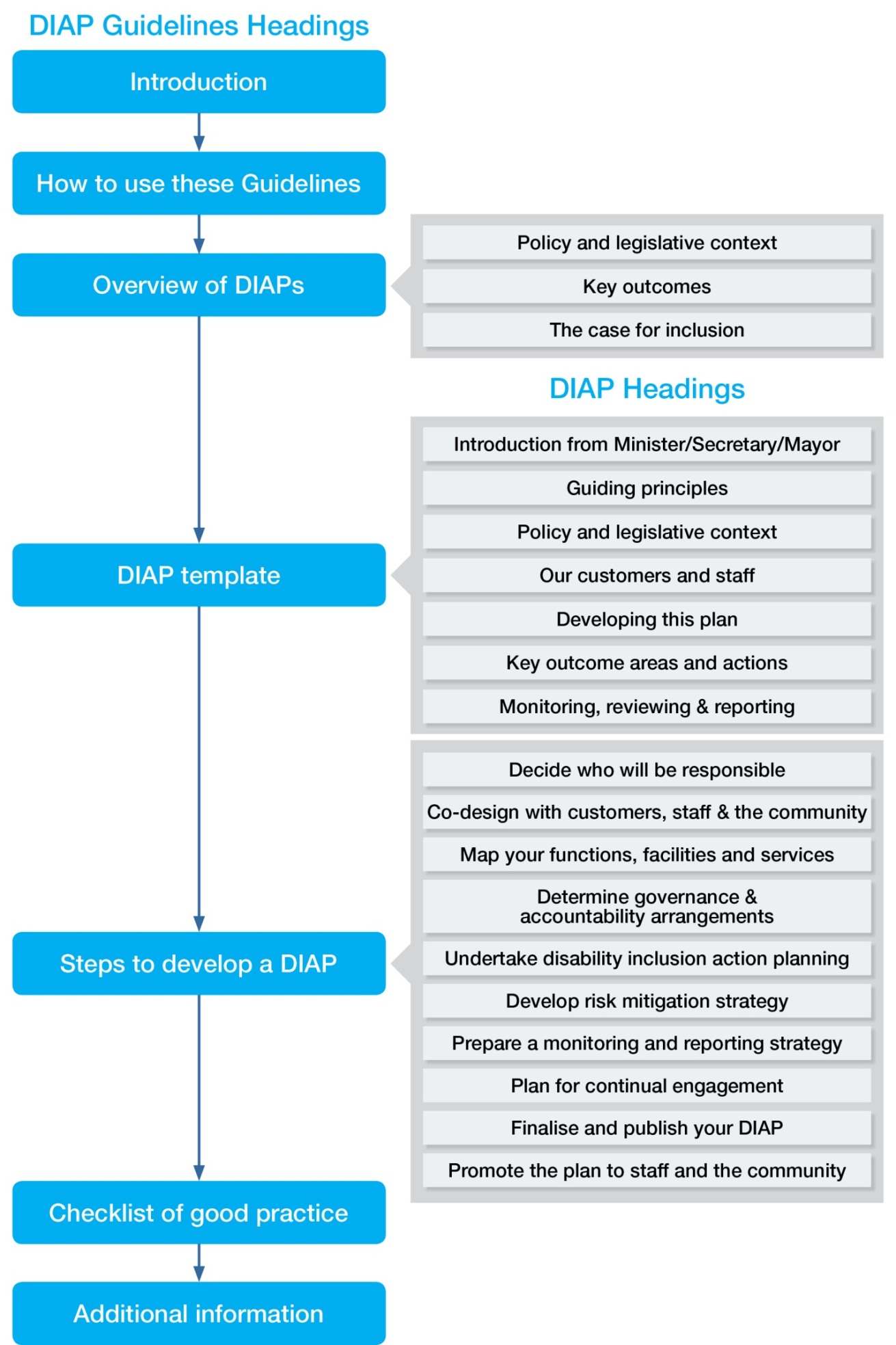
## What does this mean for the guidelines?

Realising the FACS vision of DIAPs that reflect the significant shifts underway in disability inclusion action planning and the sector more broadly will mean that individual public authorities will face different challenges in preparing DIAPs. The DIAP Guidelines will need to be flexible to accommodate the range of capacity and progress within the sector.

All public sector DIAPs will need to reflect on the shifts underway and make a firm commitment to staff, the community and other stakeholders to progressing the goals of inclusion. DIAPs will also need to clearly articulate a detailed approach for achieving these goals. DIAPs have a dual role, as a statement of commitment and as a practical plan, and the Guidelines must guide the public sector to achieving these discrete but complementary roles.

# Content recommendations for the DIAP Guidelines

The following section details a potential structure for the Guidelines, and within the Guidelines, a potential structure for Disability Inclusion Action Plans (DIAP). The diagram below outlines these proposed structures:



## Introduction

The introduction to the Guidelines plays an important dual role, engaging and motivating public authorities regarding their important role in inclusion of people with disability, as well as informing audiences of their legislative responsibilities to develop and implement a DIAP under the Disability Inclusion Act.

Key messages for inclusion in the Guidelines introduction include:

* NSW Government is entering a new era in disability inclusion action planning, reflecting a shift in the philosophical underpinnings of inclusion for people with disability taking place at an international and national level
* Overview of the social, human rights and economic imperatives of disability inclusion, potentially including an explanation of the social model of disability as a useful frame for public authorities to reassess their responsibilities
* Brief mention of the policy and legislative context, including the UN Convention on the Rights of Persons with Disabilities, the NDS, the NSW Implementation Plan and the Disability Inclusion Act including the legislative requirement for public authorities to draft and implement a DIAP
* The purpose of the Guidelines as a tool to assist with DIAP development, key changes from the 2008 Guidelines

The Introduction of aDAPting to Disability: a guide to disability action plans in Victoria and the National Disability Strategy: NSW Implementation Plan 2012-2014 contain quotes from people with disability and the former Disability Discrimination Commissioner, describing in first person the experience of exclusion – a highly impactful and person centred approach.

## How to use these guidelines

Given the introduction of some new features and sections compared to the 2008 Guidelines, a brief ‘how to’ section may be a helpful addition.

Suggested outline for this section is as follows:

* The Guidelines have been arranged into sections as follows:
* Overview of DIAPs – Background information on disability reform, DIAPs and the policy and legislative context; the importance of integrating inclusion as core business; key outcome areas to be included in planning
* DIAP Template – Outlines a suggested template for DIAPs, conforming to the requirements of by the Disability Inclusion Act
* Step by step plan for DIAP development and implementation – A practical guide to the steps necessary to develop and implement a high quality DIAP
* Checklist for good practice – Ideas for developing and implementing effective DIAPs
* Additional information – Glossary; useful resources; contacts for support.
* Details regarding accessing the Guidelines in alternative formats should be provided

## Overview of DIAPs

This section should set the context for DIAP development in detail, comprising a detailed picture of the policy and legislative context, placing a strong emphasis on the imperative for making inclusion core business within NSW Government, and setting out the new key outcome areas for planning.

The introductory paragraphs/page of the Overview of DIAPs section should outline:

* the vision for DIAPs within NSW Government as playing a valuable role in fully including people with disability in our society
* the role of DIAPs as facilitators of access to mainstream services for people with disability, potentially with some level of adaptation/or adjustment, rather than representing a focus on ‘special’ services
* a level of flexibility within the DIAP drafting and implementation process, to allow for a range of actions and strategies to reach the goals of inclusion, considering vastly different operating contexts of public authorities in NSW, while also accommodating the legislative requirements of the Disability Inclusion Act
* the flexibility for department level DIAPs, in addition to agency level DIAPs, in order to meet the goals of inclusion
* a breakout box to highlight the case study of a NSW Government DAP that helped make significant improvements in access and service delivery for its customers and staff with disability, to highlight the potential of DIAPs to drive real change

### Policy and legislative context

It is vital NSW government stakeholders clearly understand the policy reform agenda and the legislative basis for DIAPs. However, language in this section should be carefully balanced to emphasise the policy drivers for inclusion - social, human rights and economic - over the legislative requirement of the Disability Inclusion Act, which could encourage positioning DIAPs as a compliance measure.

The policy and legislative context section should summarise:

* the Disability Inclusion Act 2014 as a replacement for *Disability Services Act 1993*, specifically the new definition of disability contained within the Act, the requirement for a State Disability Inclusion Plan and public authority DIAPs, the mandated process, content and timing sections contained within the Act pertaining to DIAPs, the role for the Disability Council NSW regarding DIAPs
* the UN Convention on the Rights of Persons with Disabilities, and the Federal, State/Territory ratification in 2008, identifying the formal recognition of the social model of disability as the way to approach disability
* the NDS, highlighting the key outcome areas and philosophical shift to reflect the ratification of the UN Convention in 2008
* the NSW Implementation Plan for the NDS, noting the increased focus on inclusion and equity, access to mainstream services and the need for commitment across all levels of government
* the Disability Discrimination Act (DDA) 1993, including key provisions related to action plans
* the NSW Anti-Discrimination Act (ADA) 1977, including key provision related to Equal Employment Opportunity (EEO) Management Plans to achieve EEO for people with disability
* the NDIS, specifically the three tier system and the role DIAPs play in delivering against Tier 2 supports

### The case for inclusion

Many DAPs and Guidelines include a section ‘About Disability’ or similar, profiling the incidence of disability and providing other statistical information regarding disability. Outlining the case for inclusion based on a moral, social and economic imperative, is a more powerful way to communicate the reasons for investing in DIAP development and implementation and presents a positive, person centred approach to planning for disability, aligned to the current reform agenda.

The case for inclusion should cover the following:

* a DIAP will enable public authorities to enjoy the benefits – social and economic – of planning for greater inclusion of a significant proportion of the population
* the incidence of people with disability in NSW, including a breakdown by disability type
* an analysis of the current levels of exclusion from Government functions, facilities and services due to poor access (physical and otherwise)
* a quantification of the social and economic benefits of inclusion, presenting a clear business case for inclusion to become core business in public authorities
* advice regarding developing a tailored business case for public authorities, options for support in developing this case

Westpac's Accessibility Action Plan 2013 cites the AND figure that 65% of people with disability would consider moving their banking to a financial services company that shows leadership in providing disability confident customer service – a clear business argument for improvement.

### Key outcome areas

The key outcome areas developed for the 2008 Guidelines were well received by users of the Guidelines and sector representatives as meaningful areas for actioning change and represented a useful structure for planning and implementation. Stakeholders did however question the ongoing relevance of these outcome areas given the introduction of the NDS and the NSW Implementation Plan since the publication of the 2008 Guidelines. While the 2008 Guidelines areas are not inconsistent with the NDS, many stakeholders did request that the new Guidelines closely reference the NDS policy areas, to enhance maximum integration of State and Federal planning, implementing and reporting. On this basis, it is recommended the key outcome areas for the new Guidelines be changed to reflect the NDS six policy areas.

The following table compares the 2008 Guidelines key outcome areas, and the corresponding content requirement for DIAPs as outlined in the Disability Inclusion Act and NDS policy area.

Table – Comparison of outcome areas

|  |  |  |
| --- | --- | --- |
| NSW 2008 DAP Guidelines | NSW Disability Inclusion Act 2014 | NDS 2010-2020 |
| Making government buildings and facilities physically accessible to people with a disability | Making buildings and facilities physically accessible | Inclusive and accessible communities  Learning and skills  Health and wellbeing |
| Providing information and services in a range of formats that are accessible to people with disability | Making information accessible | Inclusive and accessible communities  Learning and skills  Health and wellbeing |
| Identifying and removing barriers to services for people with disability | Responding to the needs of people with disability as customers | Inclusive and accessible communities  Learning and skills  Health and wellbeing  Personal and community support |
| Assisting people with a disability to participate in public consultations and to apply for and participate in government advisory boards and committees | Engagement and consultation with people with disability | Inclusive and accessible communities  Rights protection, justice and legislation |
| Increasing employment participation of people with a disability in the NSW public sector | Making employment opportunities available | Economic security  Rights protection, justice and legislation |
| Using government decision-making, programs and operations to influence other agencies and sectors to improve community participation and quality of life for people with a disability | Encouraging and creating opportunities for access to the full range of services and activities available in the community |  |

One potential approach a planning framework, is to align the outcome areas in the DIAP to the NDS policy areas. Guidelines would then provide the NSW Implementation Plan’s summary of each of the areas listed below.

* **Inclusive and accessible communities** - The physical environment including public transport; parks, building and housing; digital information and communications technologies; civic life including social, sporting, recreational and cultural life.
* **Rights protection, justice and legislation** - Statutory protections such as anti-discrimination measures, complaints mechanisms, advocacy, the electoral and justice systems.
* **Economic security** - Jobs, business opportunities, financial independence, adequate income support for those not able to work and housing.
* **Personal and community support -** Inclusion and participation in the community, person centred care and support provided by specialist disability services and mainstream services; informal care and support.
* **Learning and skills** - Early childhood education and care, schools, further education, vocational education; transition from education to employment; life-long learning.
* **Health and wellbeing** - Health services, health promotions and the interactions between health and disability systems; wellbeing and enjoyment of life.

The limitation to this approach is that the Guidelines would need to acknowledge that two policy areas, ‘learning and skills’ and ‘health and wellbeing’ will receive strong focus within the DIAPs of health and education focused public authorities but little consideration in others. Consideration of these policy areas remains relevant in mapping all authority functions, facilities and services.

An alternate approach can be to use the broad outcome areas highlighted in the NSW Disability Act 2014 identified in the table above. In either example the framework should reflect the key elements of the Act and NSW Disability Inclusion Plan and provide an outcome focussed approach to service and system improvement.

The 2008 Guidelines for disability action planning by NSW Government agencies provides a list of example actions under each outcome area, serving to make the link between policy area and operational action. This approach is highly effective, although could include place more emphasis on providing example actions from a range of Government areas, with links to examples of good practice – building on the feedback from DIAP developers that sharing ideas with fellow DIAP developers is useful.

## DIAP template

We recommend presenting the DIAP template as a table, similar to the 2008 Guidelines for ease of use. To avoid being overly prescriptive, the introduction to the table should note that the planning template provides a suggested approach only. Some agencies, depending on their circumstances, may wish to incorporate additional information in their DIAPs, although should be careful to note the requirements for DIAPs outlined in the Disability Inclusion Act.

Table – DIAP TEMPLATE

|  |  |
| --- | --- |
| Introduction from Minister/Secretary/Mayor | Each public authority should open with a statement of vision and commitment to the principles of NDS, emphasising the importance of inclusion of people with disability based on moral, social and economic imperatives.  Identify the specific business case for inclusion for the public authority, and affirm a commitment to making inclusion core business. |
| Guiding principles | The Guiding Principles respond to the communications role for DIAPs - outline the specific approach to inclusion given a unique operating environment, customer and staff profile.  As a guide, public authorities may want to outline between 3-10 Guiding Principles. |
| Policy and legislative context | Authorities should reference the UN Convention on the Rights of Persons with Disabilities, the NDS, the DDA and the Disability Inclusion Act, as well as any other legislative or regulatory basis relevant to their operations such a Federal Standards. |
| Our customers and staff | Each public authority should use existing data and/or collect additional data required to profile the prevalence of disability among their customer base, potential customer base and staff members. This profile should demonstrate the strong argument for improving inclusion, given the incidence of disability. |
| Developing this plan | Each DIAP should describe the consultation strategy undertaken, including mapping objectives and methods for each stage.  The governance and accountability arrangements for ongoing implementation of the DIAP should be explained. |
| Key outcome areas and actions | Organise the DIAP within the framework of the six NDS policy areas.  Each action should be as detailed as possible, at a minimum including specific timeframes, individual/role responsible (where a team is responsible the individual/role accountable should be noted), resources required to achieve the action where relevant, specific and measurable targets, specific and measurable indicators to assess performance and where available current baseline/benchmark data. |
| Monitoring, reviewing and reporting | Outline a method to monitor, measure and review results so that the effectiveness of the DIAP can be evaluated. |

## Step by step plan for DIAP development & implementation

This step by step plan is designed to be a practical tool to assist public authorities plan their DIAP development and implementation process. It is impossible for the Guidelines to provide an exhaustive step by step manual to quality community consultation, governance design, strategic and action planning and measurement and evaluation. Consequently, additional resources for reference, assistance and advice should be provided in an Appendix.

FACS may want to consider allocating rough timelines to each stage (for example, in months), to provide DIAP developers with realistic expectations regarding the time investment and completion dates.

Each public authority drafting a DIAP will of course need to consider their specific operating environment, and adjust this plan for development and implementation accordingly.

### Decide who will be responsible

* Acknowledge that the steps outlined require a range of skills, suitable for a multi-disciplinary team rather than an individual.
* Recommend a lead officer is appointed to be responsible for leading the development and implementation of the DIAP.
* Recommend this individual be supported by an internal working group representing every service area of the authority including customer service areas and a range of levels from junior to executive staff.
* Recommend the working group is further supported by experts from outside the organisation such as people with disability or representatives of disability organisations, taking care to achieve an appropriate cross-section of disability types (sitting fees for community members will need to be paid).
* Recommend a sponsor of the DIAP is identified at the most senior level possible, to champion the importance of inclusion throughout the organisation.

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

One of the most critical stages of preparing a DIAP is community consultation to ensure the DIAP is focused on the needs of staff and customers. Section 12 of the Disability Inclusion Act makes this consultation mandatory.

Community and staff consultation takes time and involves a specific skillset to do well. To consult with communities and staff experiencing disability adds another layer of complexity to be considered carefully in planning.

While the Guidelines have a role to play in advising NSW public authorities on consulting with communities and staff to prepare and review DIAPs, the document alone is not capable of educating DIAP developers on consultation. Links to additional resources for advice should be included throughout this section, and if possible, a dedicated source of advice for community and staff consultation strategies at either FACS or the Disability Council NSW should be identified for Guideline users.

* Recommend consultation be approached as a process of co-design and collaboration with staff and communities, rather than an information briefing. This requires consultation to commence at the beginning of the DIAP development process, with multiple opportunities for input and feedback and committing to informing all participants of the progress and outcomes of each session. The International Association of Public Participation’s public participation spectrum may be a useful tool for advice regarding inclusion / consultation strategies (see Appendix C).
* Advise DIAP working groups to develop a consultation plan, identifying the methods and objectives for each stage, allowing plenty of lead-time for participants to participate in meetings and review documents, and ensuring each consultation opportunity is fully accessible to all participants (physically and to the information provided).
* Recommend the DIAP working group determine who to invite to participate – considering staff whose role relates to physical or information access, staff with disability, potential staff with disability, customers with disability, potential customers with disability, carers/families of people with disability, disability service providers and disability peak bodies/advocacy organisations. Achieving representation from a range of physical and non-physical disability types is critical.
* Recommend DIAP developers take into account the need to reimburse community participants for their participation and travel costs.
* Recommend a variety of methods to promote participation in consultations, including newspaper, broadcast and online advertisements, use of internal communications, invitations direct to customers known to be living with a disability, carers and their families, and via specialist disability organisations.

The WA Guidelines for Disability Access and Inclusion Plans contain a section outlining the advantages and disadvantages associated with various community consultation techniques, and advice for maximising access and participation for each.

### Map your functions, facilities, services and information sources

In order to effectively undertake disability planning, DIAP development teams need a clear picture of the entire operating environment in which exclusion may currently exist.

* Recommend each member of the internal working group prepare 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.
* Recommend the group come together to develop an overall map of functions, facilities and services and share this map with staff with disability, the disability sector and members of the disability community for assistance in identifying potential access and inclusion barriers and strategies to address them.

### Determine governance and accountability arrangements

A new section for the Guidelines, governance and accountability arrangements is critical to the successful implementation of DIAPs. Feedback from stakeholders consistently identified governance as a weakness in current DAPs, and a major barrier to achieving the goals of inclusion.

* Acknowledge that for disability inclusion action planning to be embedded as core business in NSW Government, implementation success needs to be part of senior managers’ KPIs.
* Recommend that responsibilities for DIAP implementation be written into senior managers’ job descriptions, and accountability arrangements within their teams established accordingly.

### Undertake disability inclusion action planning

Actions will be derived from the consultation process and through the application of appropriate tools, attention to overarching policy and guidelines and in consideration of the agency specific priorities and strategic plans.

* The DIAP must indicate what actions will be undertaken against each of the agreed outcome areas of the DIAP framework, including at a minimum specific timeframes, individual/role responsible (where a team is responsible the individual/role accountable should be noted), resources required to achieve the action where relevant, specific and measurable targets, specific and measurable indicators to assess performance and where available current baseline/benchmark data.
* DIAPs will assist agencies in identifying barriers and required adjustments for people with disability to access mainstream supports and actions and will also acknowledge and complement any supports provided via the NDIS.
* Emphasise the importance of integrating disability inclusion action planning with existing planning processes, to align the process with existing strategic priorities and achieve efficiencies where possible.
* Recommend public authorities organise forums for planning with other relevant authorities, according to geography or sector, to share ideas and achieve efficiencies.

The United Kingdom’s Office for Disability Issues’ publication Delivering Inclusive Policy required policy makers to undertake Equality Impact Assessment (EIA) for new and existing policies following the introduction of the Equality Duty in 2011. EIA is a tool that establishes the impact of policies on various groups of people, ensuring that a policy, and the way it is delivered, will be successful in improving equality for people with disability.

### Develop risk mitigation strategy

Following the completion of planning, staff and community members should again be engaged to identify risks in implementation and develop strategies to overcome these barriers.

* Emphasise the importance of ongoing risk management as a means of effective implementation.
* Recommend staff and communities co-design the risk mitigation strategy, noting separate internal and external consultations as appropriate.
* Recommend the working group allocate risks to individuals or teams to monitor and manage.

### Prepare a monitoring and reporting strategy

Section 12 of the Disability Inclusion Act stipulates that public authorities in NSW include reporting on the implementation of DIAPs in their Annual Reports, and as soon as is practicable forward a copy of the report related to DIAPs to the Minister, to be included in a report tabled in Parliament regarding disability inclusion action planning and implementation annually.

* Emphasise that high quality reporting is preceded by setting specific and measurable targets at the action planning stage.
* Advise DIAP developers to design a measurement and evaluation framework, identifying all data sources required for effective monitoring and review, developing strategies for additional data collection as required.
* Advise public authorities of their legislative responsibilities under the Disability Inclusion Act to report on actions undertaken to implement their DIAP in their Annual Report.

### Plan for continual engagement

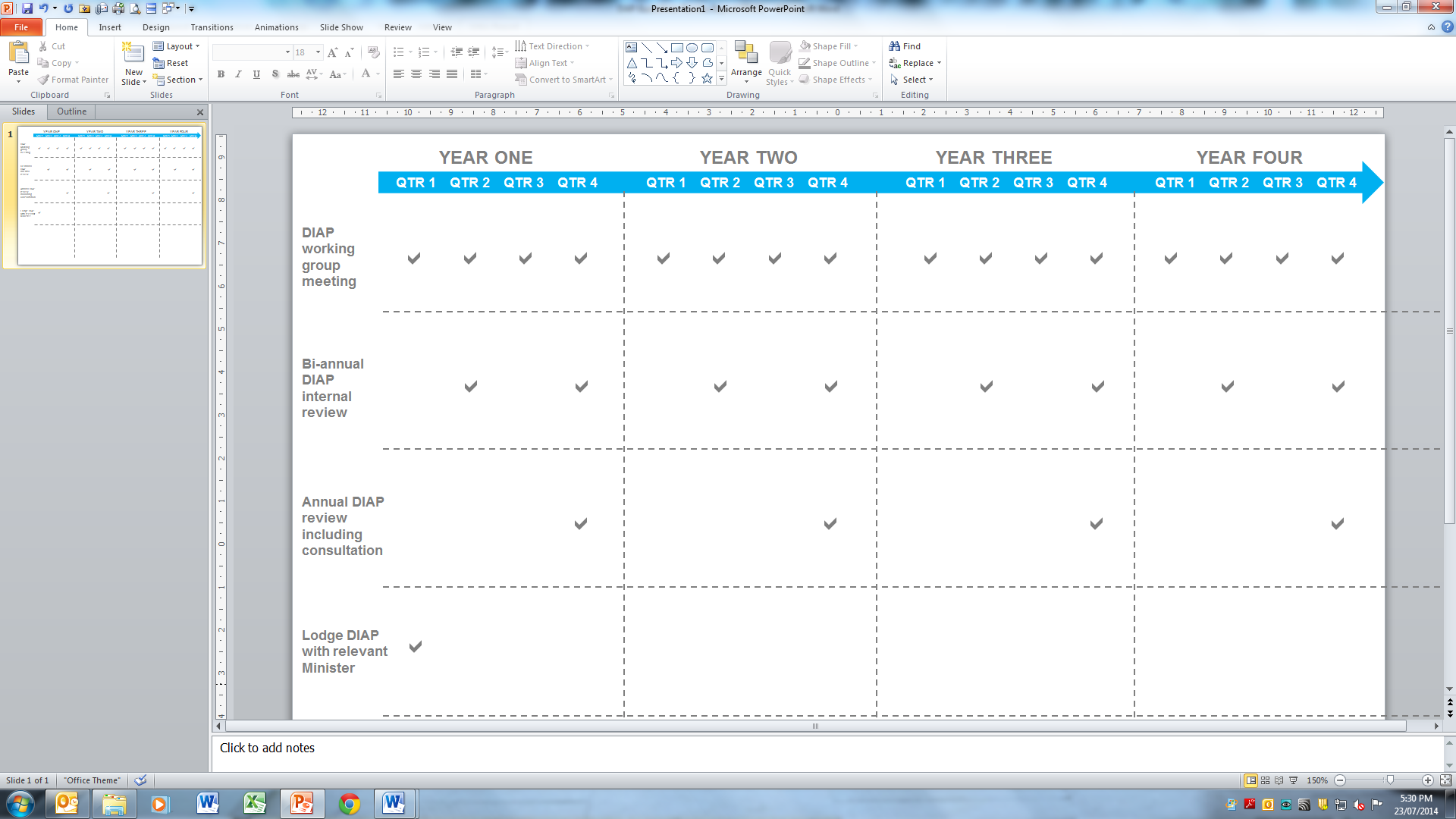
The Disability Inclusion Act requires public authorities to review their DIAPs every four years, but it should be clear to developers that DIAPs should be living documents, regularly amended to reflect a shifting context, and approached in the spirit of continuous improvement.

While the requirement to lodge completed DIAPs with the Minister suggests completion of the DIAP development process, the Guidelines should make it clear DIAP development is only the first step – the spirit of inclusion planning must be embedded within the culture of NSW Government agencies and implemented accordingly.

This cultural shift requires continual engagement with the relevant DIAP, driven by the DIAP working group but involving agency staff and relevant stakeholders more broadly as a standing item for engagement, planning and implementation.

* Recommend public authorities approach the review of their DIAP in the spirit of continuous improvement, for example, conducting quarterly meetings of the working group to monitor progress, a bi-annual internal review to adjust actions as required, an annual review including elements of staff and community consultation to reassess actions and risk mitigation. Figure 1 demonstrates the continual action required to drive ongoing engagement with the DIAP.
* As part of the bi-annual review, the checklist of good practice at section 4.6 could be used by agencies to conduct a self-assessment of DIAP progress and drive improvement as necessary.

Figure – DIAP review timetable



### Finalise and publish your DIAP

Section 12 of the Disability Inclusion Act requires public authorities to provide a copy of completed DIAPs to the Disability Council NSW and make the DIAP publicly available.

* Note that under the Disability Inclusion Act, DIAPs prepared by public authorities in NSW must be readily available to the public – they should be easily accessed on websites and it is expected websites should be compatible with W3C’s Web Content Accessibility Guidelines conformance level AA
* Recommend continued sign off of DIAPs at Departmental Executive level
* Recommend public authorities take steps to ensure their DIAPs are accessible (and publish the option to access in accessible formats), for example, using a minimum font size 12 and in high contrast with the background, providing alternative formats such as audio, large print and an easy English version and measures and systems should be in place so they can respond to requests
* Recommend DIAPs are forwarded to the Disability Council NSW and lodged with Australian Human Rights Commission, who lists and provides links to all DIAPs registered on its website

### Promote the DIAP to staff and the community

* Advise public authorities to distribute their plan internally via the intranet, and raise awareness in a range of ways to be tailored by organisations including but not limited to poster campaigns, newsletters, awards recognising individuals involved in achieving DIAP targets and including the Plan in induction processes.
* Recommend DIAPs are also promoted in a range of ways externally, including using the website, newsletters (directly to people who participated in the consultations, other disability organisations, and the general public), as well as through the media.
* Recommend regular updates on DIAP implementation progress are communicated to staff, including case studies in print or vox-pop style to bring to life the achievements of the DIAP.
* Recommend the DIAP be available in summary format, limited to a few pages, for distribution to wider audiences.

## Checklist of good practice

The following suggested checklist may be included as a list or alternatively included as ‘breakout boxes’ throughout the document.

* The DIAP is positioned as **core business and integrated with existing planning cycles**; employees at every level consider inclusion of people with disability their business.
* The DIAP is a **dynamic document regularly reviewed and improved**; not a standalone DIAP that is developed and shelved.
* **Resources are allocated** for DIAP development and implementation as part of budget planning.
* DIAPs include **case studies** throughout, to highlight achievements in relation to inclusion planning and/or highlight scenarios for improved performance.
* Governance and accountability structures are designed to **link DIAP implementation to the KPIs** of senior managers in every service area of the organisation.
* Action plans include **specific and measurable targets** for every action, avoiding the use of ambiguous timeframes, targets, indicators and responsibilities, and a measurement and evaluation strategy is developed to ensure progress is determined by hard evidence.
* The DIAP is sponsored and **championed at the most senior level possible**, positioning inclusion planning as a high priority.
* Community **consultation is undertaken in the spirit of collaboration** rather than information briefing, involving staff and the disability community early in the DIAP’s development, and taking steps to maximise participation at multiple engagement opportunities.
* An investment is made in designing the DIAP to be **visually engaging** and usable.
* The DIAP is **complemented by additional training**, particularly for frontline service delivery staff, regarding the importance of and practical steps toward disability inclusion.

aDAPting to Disability: a guide to disability action plans in Victoria contains lists ‘Ten features of a good disability action plan’ and ‘Ten features of a poor disability action plan’ which are useful checklists of good practice worth adapting for the NSW DIAP Guidelines.

## Additional information

In the interest of designing the Guidelines to be simultaneously streamlined and useable, while also informative and effective, the following outlines a suggested list of Appendices.

* Glossary of terms and acronyms.
* Additional resources including links to physical access, community consultation, data collection and measurement resources.
* Factsheets. One page factsheets for each of the following: Community consultation; Governance and accountability structures; Designing a measurement and evaluation strategy.
* Contact details for further support from FACS and the Disability Council NSW as appropriate.

The WA Guidelines for Disability Access and Inclusion Plans contain one page factsheets that outlining key issues such as language and key elements of a Plan.

# Next steps in Guidelines development

## Co-design with the disability community

It is important that FACS demonstrate a commitment to co-design by engaging staff in NSW government agencies, the disability community and other stakeholders when finalising the DIAP Guidelines. This report should be considered a start point for reviewing the Guidelines. While some disability advocacy organisations and peak bodies were included in the stakeholder consultations, we recommend a co-design strategy be developed to further engage the disability sector and make adjustments to the proposed direction as required.

Consultation with NSW government stakeholders should also be undertaken before launch, to provide an opportunity for feedback among the future users of the Guidelines.

## Implementing the new guidelines

### The role of the guidelines within a broader cultural change challenge

The attitudinal shift from thinking about disability in terms of the medical model, the provision of specialist services and physical access, to an approach based on full inclusion, choice and control for people with disability and provision of access to mainstream services is a significant cultural shift in Australia. This change will take time, and involves all sectors of the community – government, business, the community sector, frontline service providers in all industries, people with disability and their families and the general population.

DIAPs alone cannot be expected to affect this change, even within the public sector setting. DIAPs and the DIAP Guidelines should be acknowledged as important agents of change, but will not achieve significant change in isolation.

DIAPs and the DIAP Guidelines need to be part of a larger change management drive to engage staff throughout the NSW public sector with the new direction of providing full inclusion for people with disability. Suggestions from stakeholders in terms of complementary measures to achieve this cultural change included:

* training for public authority staff responsible for developing and implementing DIAPs
* training for frontline service delivery staff, with the view to providing more access to mainstream services for people with disability
* sponsorship of disability inclusion action planning from the highest level
* alignment of social procurement strategies with disability inclusion, only contracting suppliers who demonstrate a commitment to full inclusion for people with disability.

### The role for FACS and the Disability Council NSW

FACS and the Disability Council NSW have a critical role to play as champions for inclusion planning within NSW Government agencies, using the Guidelines as one of several tools to engage stakeholders and drive change.

Consideration should be given to the potential facilitation role for FACS with regard to communicating the Guidelines and assisting with DIAP development and implementation. Stakeholders expressed an interest in FACS facilitating coordination within regions and service areas, playing a role as data custodian to assist public authorities build their case for inclusion, providing training to develop and implement DIAPs as well as for front-line staff, and potentially playing a stronger enforcement role in DIAP implementation. There is a potentially a role for the Disability Council NSW and/or the community sector to deliver some of these services.

Concurrent work is underway within FACS, including the development of learning and development materials, designed to assist NSW Government agencies to fully integrate disability inclusion into mainstream planning, operations and service delivery processes will help bring clarity to the role for FACS and the Disability Council NSW.

### Promotion strategies for the Guidelines

Critical to the successful launch and embedding of the Guidelines is support from the highest levels of Government. Given the legacy of DIAPs being viewed as a compliance measure by some in the past, sponsorship of the Guidelines and positioning of DIAPs as an important tool to progress the current disability reform agenda will be vital to move DIAPs into a new chapter.

Finally, the Guidelines should be officially launched at an event, ideally with sponsorship from the highest levels of NSW government, to demonstrate commitment to disability inclusion action planning and the potential DIAPs have to create change. A launch event is another opportunity for FACS to model the principles of disability inclusion, by designing an occasion that is fully inclusive in terms of physical access, the information provided and also includes individuals with disability who can speak of the important role of DIAPs in improving equity and creating opportunity for people with disability.

Disclaimer

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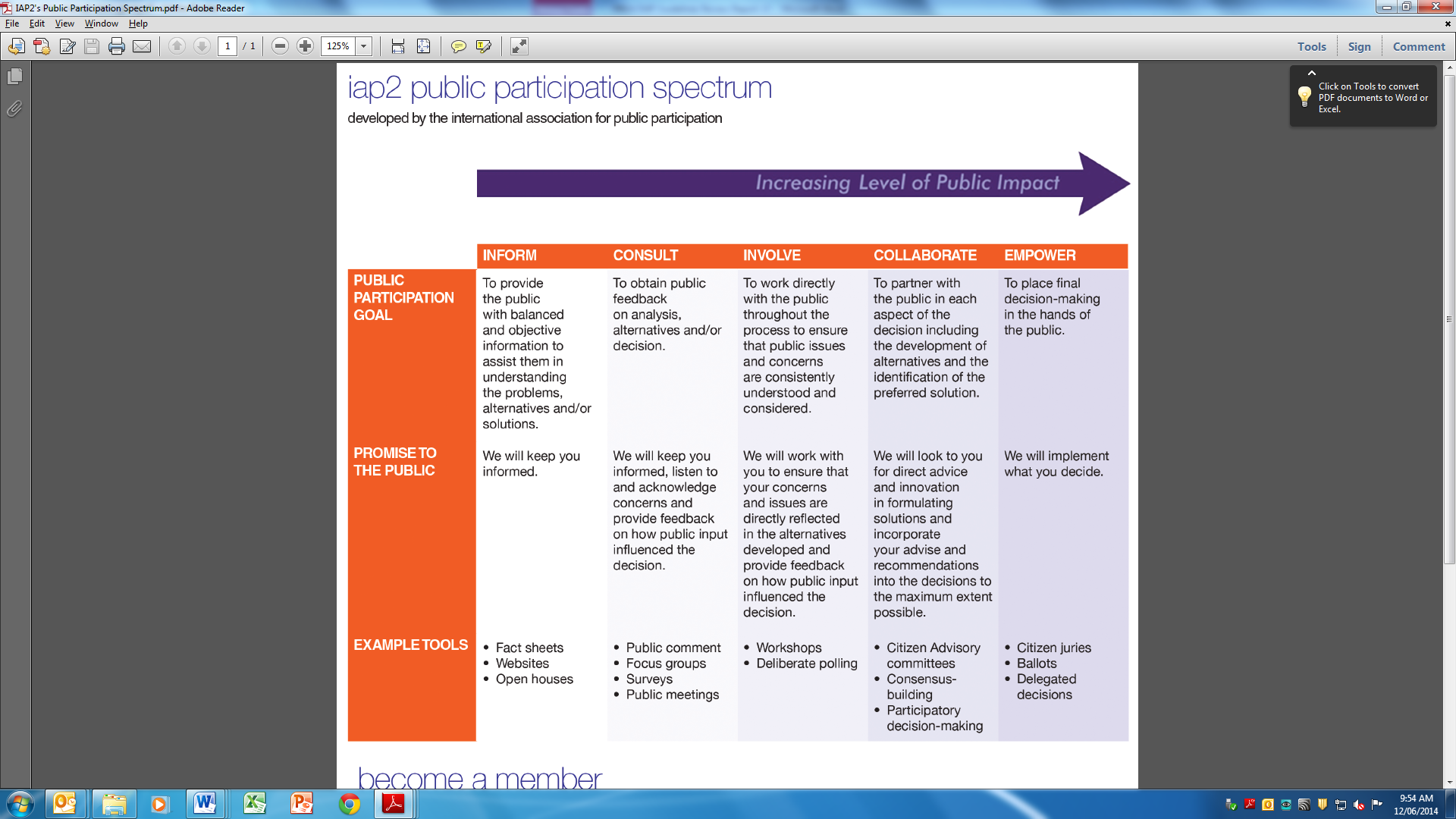
1. List of stakeholder consultations

|  |  |
| --- | --- |
| SECTor representatives | Suzanne Colbert, Australian Network on Disability |
|  | Cain Beckett, Disability Council NSW / PwC |
|  | Melinda Savvides, Disability Council NSW |
|  | Diana Qian, Disability Council NSW |
|  | Ruth Robinson, Physical Disability Council of NSW |
|  | Rashmi Kumar, Council of Social Services NSW |
|  | Nancy Walker, Multicultural Disability Advocacy Australia |
|  | Margaret Kay, Local Government NSW |
| NSW Government stakeholders | Gail Lebransky, Transport for NSW |
|  | Karen Legge, Division of Local Government |
|  | Julie Lonsdale, Department of Premier and Cabinet |
|  | Denise Pendleton, Public Service Commission |
|  | Melissa Clements, Department of Education and Communities |
|  | Sharon Young, Department of Education and Communities |
|  | Kim Spinks, Arts NSW (Department of Trade and Investment) |
|  | Nea Cahill, Arts NSW (Department of Trade and Investment) |
|  | Liz Junck, NSW Health |
|  | Dani Fried, NSW Health |
|  | Shefali Rovik, Juvenile Justice (Attorney General and Justice) |
|  | Judy Harwood, Department of Family and Community Services |
|  | Jane Selwood, Department of Family and Community Services |
|  | Jenna Macnab, Attorney General and Justice |
|  | Yasmin Hunter, Attorney General and Justice |
|  | Lisa Du, Ombudsman NSW |
|  | Rennie Gay, Department of Family and Community Services |
|  | Marina Hedgecombe, Department of Family and Community Services |
| private sector stakeholders | Donna Purcell, Diversity Manager, Commonwealth Bank of Australia |
|  | Louise Bannerman, Disability Project Officer, University of Sydney |

1. Disability action plans, Guidelines and other resources reviewed

|  |  |
| --- | --- |
| NSW Government daps | Transport for NSW 2012-2017 |
|  | NSW Health 2009-2014 |
|  | Department of Education and Communities 2011-2015 |
|  | Department of Planning 2010 |
|  | Department of Premier & Cabinet 2010-2013 |
|  | Department Aboriginal Affairs 2008-2010 |
|  | Department of Trade and Investment 2014-2015 |
|  | Ambulance NSW 2009-2014 |
|  | NSW Ombudsman 2010-2014 |
|  | LegalAid 2009-2011 |
|  | NSW Police Force 2010-2011 |
|  | Greater Southern Area Health Service 2009-2011 |
|  | Sydney Opera House 2009-2012 |
|  | State Library of NSW 2010-2014 |
|  | NSW Attorney General & Justice 2014-2016 |
|  | Sydney Olympic Park 2009-2013 |
| nsw local government daps | Rockdale Shire Council 2012 |
|  | Shoalhaven Shire Council 2012 |
|  | Blacktown City Council 2012-2015 |
|  | City of Sydney Inclusion (Disability) Plan 2014-2017 |
| other public sector daps | Commonwealth Prime Minister and Cabinet (Workplace Diversity Strategy) 2011-2014 |
|  | Commonwealth Department of Foreign Affairs and Trade 2011-2015 |
|  | Commonwealth Attorney General & Justice 2013-2015 |
|  | Western Australia - Public Transport Authority 2012-2017 |
|  | Australia Post 2012-2015 |
| privater sector Plans | University of Sydney Disability Action Plan 2013-2018 |
|  | Westpac Accessibility Action Plan 2013 |
|  | ANZ Accessibility and Inclusion Plan 2013-2015 |
|  | Australian Chamber Orchestra Disability Action Plan 2012 |
|  | McDonald's Australia Disability Discrimination Act Action Plan 2004 |
|  | Qantas Airways Limited Disability Access Facilitation Plan 2013 |
|  | Commonwealth Bank of Australia Disability Action Plan 2012 |
| guidelines or similar documents | NSW – Disability Action Planning Guidelines 2008 |
|  | VIC – aDAPting to Disability, a guide to disability action plans |
|  | WA - Disability Access and Inclusion Plans - Resource Manual for State Government |
|  | Commonwealth Disability Strategy Implementation Plan 2000 |
|  | ACT – Policy Management Framework 2012 |
|  | England – Planning and access for disabled people, a good practice guide 2003 |
|  | Scotland – Disability Equity Scheme 2008-2011 |
|  | Wales –Best practice guide for arts providers on disability issues 2008 |
| other resources | Australia - Australian Human Rights Commission – Guide to disability action plans |
|  | Australia - Community Relations Commission – Multicultural Planning, a resource for practitioners |
|  | United Kingdom – Office of Disability Issues, Delivery Inclusive Policy |
|  | United Kingdom – Equality and Human Rights Commission, Meeting the equality duty in policy and decision-making |

1. International Association of Public Participation’s Public Participation Spectrum



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| Melbourne Level 12, 120 Collins Street Melbourne, VIC 3000 t +03 8663 4888 f +03 8663 4999 | Perth Level 1, 55 St Georges Terrace Perth, WA 6000 t +08 9346 0500 f +08 9221 1779 | Australia • Asia • Middle East [**w** urbis.com.au](http://www.urbis.com.au) e info@urbis.com.au |

1. At the time of publication, the Disability Inclusion Bill 2014 was before NSW parliament. In its current form, the Bill requires NSW government agencies including local governments to complete Disability Inclusion Action Plans. [↑](#footnote-ref-1)