NSW Disability Inclusion Action Planning Guidelines

Local Government

November 2015

Acknowledgments

LOCAL GOVERNMENT NSW

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NSW GOVERNMENT | Family & Community Services

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Contents

Purpose of these guidelines

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The purpose of these guidelines is to assist Local Government to effectively plan for and deliver on the diverse needs of people with disability in their community.

Local Government is required by the *NSW Disability Inclusion Act 2014* (DIA) to undertake disability inclusion action planning by 1 July 2017. These guidelines provide Local Government with the necessary tools to develop a stand-alone Disability Inclusion Action Plan or to undertake a disability inclusion action planning process that is delivered through their Integrated Planning and Reporting (IP&R) framework. Whatever the choice, councils must show that people with disability have been regularly engaged and that inclusion is effectively delivered.

While there have been many major successes in disability action planning over the years, there remains significant scope for improvement. These guidelines acknowledge and seek to build on these successes and encourage improved consultation and involvement of people with disability throughout the planning and implementation process.

Disability inclusion action planning guidelines for Local Government

These guidelines have been adapted from the NSW Disability Inclusion Action Planning Guidelines developed by the NSW Department of Family and Community Services (FACS). While these guidelines reflect the same underlying principles of inclusion and engagement, they have been prepared to include additional material to practically address the implementation of disability inclusion action planning by NSW councils. These guidelines have been developed in consultation with FACS, Local Government NSW (LGNSW), the Office of Local Government and a Steering Group including representatives from councils, the NSW Disability Council and COTA NSW.

These guidelines apply to all NSW councils.

Key elements incorporated in these guidelines for Local Government:

- Alignment with the IP&R framework

- The business case for inclusion of people with disability in our communities

- Consideration of strategic regional partnerships to support inclusion of people with disability

- Description of a range of Local Government case studies to reflect the disability inclusion key outcome areas and inclusion planning process

- Identification of key performance indicators to support annual reporting of disability inclusion action planning.

Disability inclusion action planning should be positioned as core business and integrated with the IP&R cycle, so that elected members and council staff at every level consider inclusion of people with disability in their business.

Format

These guidelines have been arranged into sections as follows:

Section 1: Provides an overview of disability inclusion action planning including the current legislative context, the business case for inclusion and key changes to the disability inclusion action planning process.

Section 2: Summarises the disability inclusion focus areas and identifies how these apply to Local Government.

Section 3: Outlines the disability inclusion action planning process for Local Government with a focus on integration with the IP&R framework.

Section 4: Details the planning and implementation steps of a disability inclusion action planning process including addressing the legislated requirements for Local Government.

Section 5: Identifies additional resources and support available to councils, including information on performance indicators.

For additional support or information:

Local Government NSW
Key contact: Senior Policy Officer – Ageing and Disability
Phone: 02 9242 4000
Email: lgnsw@lgnsw.org.au
Webpage: www.lgnsw.org.au

NSW Office of Local Government
Phone: 02 4428 4100
Email: olg@olg.nsw.gov.au
Webpage: www.olg.nsw.gov.au

NSW Family and Community Services
Disability Inclusion line on 1800 782 306
Email: nswdip@facs.nsw.gov.au
Webpage: www.facs.nsw.gov.au/diap

1   Overview

The NSW Government is committed to disability inclusion to build a strong and equitable community.

They support the fundamental right of choice for people with disability in our society. People with disability must have the same right to choose how they live their lives, to access opportunities and enjoy the benefits of living and working in our society as all residents do. This belief underpins disability inclusion planning in the NSW Local Government sector and the objective to ensure that local services, facilities and programs provided by councils are inclusive.

> **In twenty years, men may be able to live on the moon. In forty years we may get to Mars. In the next 200 years we may leave the solar system and head for the stars. But meanwhile, we would like to get to the supermarket, the cinema, restaurants.”**

Stephen Hawking

1.1   Policy and legislative framework

NSW is currently undergoing a period of major reform in the disability sector. Within this, there is an on-going commitment to improving inclusion for people with disability.

Figure 1   The relationships between the relevant policy and legislative instruments
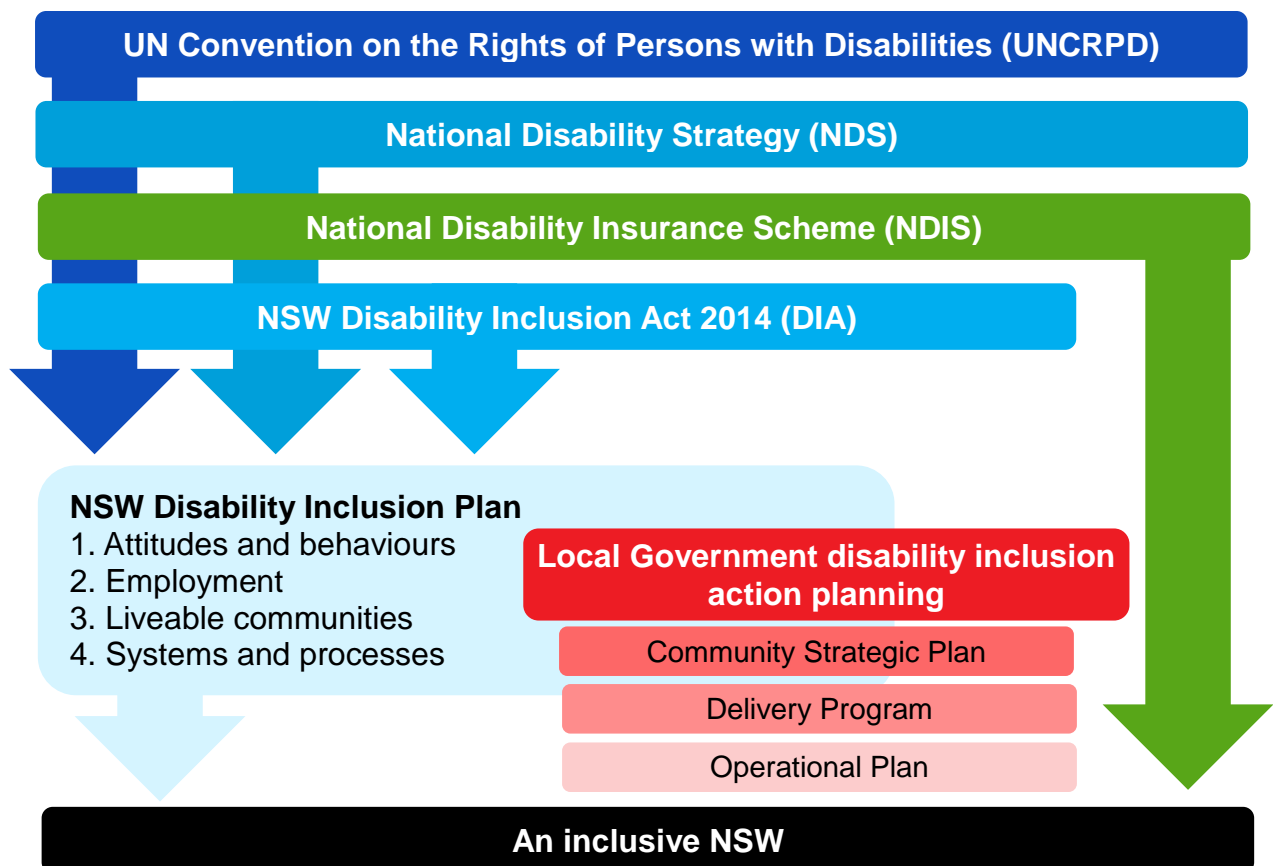
Disability inclusion action planning should reflect the unique legislative and policy responsibilities of Local Government.

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

The UNCRPD, ratified by Australia in 2008, acknowledges that people with disability have the same human rights as those without disability. This commits participating governments to ensure these rights can be exercised and that barriers are removed. The UNCPRD supports the social model of disability. This recognises that attitudes, practices and structures are disabling and can create barriers to people with disability from enjoying economic participation, social inclusion and equality which are not an inevitable outcome of their disability.

> **Ideally, we want to live in a dignified and simplified society where we have the confidence and self-esteem to speak our mind and have the opportunities that everyone has. "** [1]

National Disability Strategy 2010-2020 (NDS)

The NDS 2010-2020, developed in partnership by the Commonwealth, State, Territory and Local Governments, sets out a national plan for improving life for Australians with disability, their families and carers, to support the commitment made to the UNCRPD.

The NDS NSW Implementation Plan 2012-2014 was the NSW Government's initial two-year strategy to promote the principles of the NDS.

Actions in the Implementation Plan that involve councils include:

- Implementing Web Content Accessibility Guidelines 2.0 Level AA
- Implementing local strategic plans and delivery programs
- Integrating NSW guidelines on universal design principles and *Disability (Access to Premises - Buildings) Standards 2010*
- Improving the availability of accessible toilets
- Supporting access to sports and recreation facilities
- Identifying measures to encourage people with disability to stand for election to Local Government
- Increasing internal workforce diversity.

The majority of these actions have now been aligned with the aims and objectives of the *NSW Disability Inclusion Act 2014* and NSW Disability Inclusion Plan.

National Disability Insurance Scheme

The National Disability Insurance Scheme (NDIS) is a major reform that will deliver a national system of disability support focused on the individual needs and choices of people with disability. The NDIS gives participants more choice and control over how, when and where supports are provided. Funding is allocated to each eligible individual, rather than block

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[1] Submission to Shut Out: The Experience of People with Disabilities and their Families in Australia (2009) Australian Government Department of Families, Housing, Community Services and Indigenous Affairs and the National People with Disabilities and Carer Council, 2009

funding being allocated to service providers. The NDIS will roll out across the whole of NSW by 2018.

The role of councils in the NDIS will vary depending on their community, their relationship with local disability interests, and role within disability service provision. While the NDIS presents a new method of funding services required by people with disability, the role of Local Government in delivering inclusion is much broader than simply service provision. Disability inclusion action planning is complementary to the NDIS, and will assist councils in breaking down local barriers to full participation by people with disability in the community.

NSW Disability Inclusion Act 2014

The *Disability Inclusion Act 2014 (DIA)* defines disability as:

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

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

The DIA's person-centred approach provides the legal foundation for regulating supports, services, and funding to people with disability until full transition to the National Disability Insurance Scheme (NDIS). The DIA mandates the development of the NSW Disability Inclusion Plan and individual State Government agency disability inclusion action plans to support people with disability beyond the NDIS.

The DIA also encourages planning and coordination across state and Local Government to reduce barriers for people with disability. It mandates Local Government to undertake disability inclusion action planning while recognising that disability action planning is not a new approach for some councils. A number of NSW councils have an existing disability action plan as a consequence of the federal *Disability Discrimination Act (1992)* and subsequent associated court cases.

The DIA also builds on existing social equity requirements within the IP&R framework to strengthen Local Government commitment to inclusion, consultation and rights for people with disability.

Under the *Disability Inclusion Regulation 2014*, councils must prepare a disability inclusion action plan by 1 July 2017. This plan can be addressed through the Local Government integrated planning process.

This timing is designed to fit the current Community Strategic Planning and Delivery Program cycle. Disability inclusion action planning plays a critical role in identifying and delivering on practical measures to transform intent into action by Local Government.

It is essential to consider the diversity of people with disability in action planning for inclusion. 'People with disability' does not refer to a readily identifiable group, but to a wider community who may need support to fully participate in society, whether temporarily or throughout their lives. This might include, for instance, people with changing abilities due to ageing, people with a temporary illness or injury that affects their ability to participate, children with disability, Aboriginal and Torres Strait Islander people with disability, or people with disability from culturally and linguistically diverse backgrounds.

Other legislation, which has relevance to the delivery of disability inclusion action planning for Local Government, includes:

- *Commonwealth Disability Discrimination Act 1992* *(DDA)*
- Commonwealth Disability (Access to Premises — Buildings) Standards 2010
- *NSW Anti-Discrimination Act 1977* *(ADA)*
- *Local Government Act 1993* and *Local Government (General) Regulation* *2005.*

1.2   The case for inclusion

Personal choice and control is only possible when communities are inclusive for all people with disability, including those with physical, intellectual, cognitive, sensory disabilities and those with mental health conditions. Real diversity cannot be realised unless people with disability are provided with the opportunities inherent in truly inclusive communities. Local Government plays a key role in both protecting the rights of people with disability and in promoting the value of diversity and inclusion across the community.

There is an underlying social responsibility for Local Government to work to remove barriers to people with disability fully participating in society. There are also sound economic reasons to increase inclusiveness such as reduced reliance by people with disability on others or on specialist services.

In addition to the human rights imperative the case for an inclusive community is strong:

- As a community, we are poorer without a diverse range of viewpoints and individual perspectives
- Exclusion leads to disadvantage and discrimination, which have far reaching negative impacts across all aspects of life, including health, welfare, education and employment. These impacts are felt beyond the individual, with families and the broader community being negatively impacted by a non-inclusive community
- There is a strong economic imperative for increasing the inclusiveness of our society. Employment can provide independence, reduce reliance on government income support and improve the living standards of people with disability. This can also have positive health impacts and contribute to a greater sense of self-worth
- Providing physical access to businesses benefits not only people with disability, but older people, parents with prams and business owners by expanding their business reach
- With an ageing population there is a growing need to not simply create places for older people but ensure that all places are designed to support people regardless of age.

There are a number of factors contributing to the case for an inclusive community in the Local Government context:

- Disability inclusion action planning presents an opportunity for councils to work towards meeting the objectives of their community strategic plans, which generally align with the principles of inclusion and social justice
- Removing barriers for people with disability supports the inclusion of members of the local community who may otherwise fall outside of identified definitions of disadvantage

- Early planning and intervention presents an opportunity for long-term savings to the community, reducing the need for retrospective action such as retrofits. This is a particularly important consideration given that Australia's ageing population is also likely to increase the number of people with disability in the community

- Inclusion improves opportunities for participation in the local economy, with the potential to increase economic activity within the Local Government Area.

Each council will have a unique business case for supporting inclusion of people with disability. This rationale should be explored and documented in the disability inclusion action planning process.

1.3   Delivering on inclusion

These guidelines outline the planning requirements and propose a pathway for Local Government to work towards an inclusive community.

Some councils may already have plans in place that meet the criteria of a disability inclusion action plan. They will not be required to deliver a new plan or action planning process but will need to meet the ongoing legislative requirements as directed by DIA (see Local Government Disability Inclusion Checklist Section 4.2). This includes ensuring that their existing plan is reflected in their Delivery Program and Resourcing Strategy.

Action Planning or an Action Plan

Under the new legislation, a disability inclusion action plan may be a separate document, or part of a document prepared for another purpose if this fulfils the same requirements as outlined in the DIA. This means that councils are not required to prepare a standalone disability inclusion action plan, but that disability inclusion action planning can be incorporated into the IP&R framework.

Councils can either develop a disability inclusion action plan that will inform the IP&R process, or directly integrate disability inclusion action planning requirements throughout their IP&R framework. This choice recognises the importance of the existing IP&R framework as a driver of decision-making in Local Government.

Each council needs to determine how best to address the needs of people with disability in their community through their action planning process. The approach should reflect local characteristics, strengths and governance structures as well as identify, collate and coordinate specific actions for inclusion that inform IP&R outcomes.

While the guidelines are aligned with the areas of focus of the NSW Disability Inclusion Plan, councils will need to operate within their own legislative and compliance framework, particularly the IP&R framework as well as ensure compliance with Commonwealth legislation (DDA).

It is recognised that councils work under multiple regulatory and compliance frameworks which impact delivery of, for example, housing, transport and employment. These frameworks do not necessarily support inclusion objectives and can present challenges to the development and delivery of disability inclusion actions. Inclusion planning provides an opportunity for a concerted whole of council approach that supports cross-departmental collaboration and on-going dialogue to overcome any conflicts in existing planning and delivery frameworks.

Key changes to disability inclusion action planning under the DIA include:

- **Name** – Previously known as Disability Action Plans, the DIA now requires NSW public authorities to have Disability Inclusion Action Plans (DIAPs)

- **Legislative basis** – The *Disability Services Act 1993* has been replaced by the *Disability Inclusion Act 2014*, which requires all government departments and certain public authorities, including councils, in NSW to have a Disability Inclusion Action Plan

- **Key focus areas** – The four areas (attitudes and behaviours, liveable communities, employment, and systems and processes) are aligned to the NSW Disability Inclusion Plan priority areas, identified by people with disability as the focus for concerted and sustained attention

- **Consultation** – A greater emphasis on consultation at all stages of planning, implementation and monitoring and direction on how to conduct inclusive consultation with stakeholders, staff and the community have been included

- **Reporting** – New public monitoring and reporting requirements through Local Government Annual Reports and dissemination of reports to the Minister

- **Governance** – Highlighting the importance of leadership, governance and accountability being in place at the outset and effective arrangements are agreed to support implementation.

2   Disability inclusion focus areas

The NSW Disability Inclusion Plan provides a strategy to implement the DIA and address the National Disability Strategy 2010-2020 principles across government and the community.

It sets out:

1. The whole of government goals that support the inclusion of people with disability in the community and improve access to services and community facilities by people with disability; and

2. Provides for collaboration and co-ordination among public authorities, including Local Government, in the provision of supports and services.

The NSW Disability Inclusion Plan identifies four key focus areas, nominated by people with disability, as being of primary importance in creating an inclusive community.

These are:

- Developing positive community **attitudes and behaviours**

- Creating **liveable communities**

- Supporting access to **meaningful employment**

- Improving access to services through better **systems and processes**.

Each focus area is summarised below.

2.1   Attitudes and behaviour

The attitudes and behaviours of the general community towards people with disability have been described as the single greatest barrier to full access and inclusion. Consultation to date has identified that attitudes towards people with disability are often determined by ignorance, fear, or lack of opportunity to interact. It is important that council staff and councillors display a positive attitude to people with disability and focus on measures to support positive and inclusive attitudes and behaviours across the community.

Examples of actions by Local Government might include:

- Integrating training on access and inclusion into staff induction practices

- Including images of people with disability in mainstream publications and in promotion of mainstream events, not just for disability specific areas

- Reviewing and adjusting funding agreements and contracts to specify delivery of accessible and inclusive services and programs by third parties or contractors

- Developing public messages and campaigns that highlight inclusion and recognise the rights and contribution of people with disability in the community

- Involving people with disability in the development of communication campaigns regarding inclusion.

Practice examples – attitudes and behaviour

Ku-ring-gai Council is developing a workforce training program to up-skill Council staff with access and disability knowledge relevant to their area of work. Council staff will attend conferences, forums, workshops, field placements, active engagement and access walks as appropriate.

Tweed Shire Council, since 2013 has celebrated achievement and innovation in building an accessible community through its annual Access and Inclusion Awards. They recognise and acknowledge action by individuals, community groups, organisations and businesses that build and promote an accessible and inclusive community for everyone in the Tweed. They include the Belonging Award, to encourage social inclusion of children with a disability and My Choice Matters short film making project.

Canterbury Council provides disability awareness training as part of their three day induction course for new staff.

2.2   Liveable Communities

Liveable communities are important for all people in the community and are achieved by applying the principles of universal design. Attention and resources should be focussed on the elements of community life that are of highest importance to people with disability. Creating liveable communities is more than modifying the physical environment; it covers areas such as universal housing design, access to transport, community recreation, council policies and social engagement.

Universal design

Universal design is defined by UNCRPD as the design of products, environments, programs and services to be usable by all people of different ages and abilities over time, to the greatest extent possible, without the need for adaptation or specialised design.

Seven principles of universal design were established by a working group of architects, product designers, engineers and environmental design researchers to guide design disciplines. [http://universaldesign.ie/What-is-Universal-Design/The-7-Principles]

Examples of actions might include:

- Providing accessible toilets in all public buildings
- Providing change tables (including adult change tables and hoists) in appropriate locations
- Providing continuous accessible paths of travel (CAPT) between facilities and services in town centres
- Going beyond access standards to apply the principles of universal design in the planning of new housing, infrastructure and buildings
- Ensuring community events are accessible through early consideration of venues, transport, toilets, parking and accessibility

- Engaging people with disability in the design and planning phases of new infrastructure and buildings to support truly accessible and inclusive assets (especially as current building standards can be inadequate)

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

- Ensuring all community recreation, cultural and social programs are inclusive and accessible.

Practice examples – liveable communities

Marrickville Council's Access Committee provides recommendations on matters relating to access for people with disabilities to Council facilities and services and within the community generally. Council is currently reviewing its Access and Mobility Kit and preparing a set of guidelines to support implementation of the recently introduced Commonwealth Disability (Access to Premises – Buildings) Standards 2010.

Armidale Dumaresq Council has been supporting the identification and mapping of accessible toilets through the National Public Toilet Map Project. In NSW this project involves a partnership between the Department of Family and Community Services and Spinal Cord Injuries Australia. Council has offered a $100 gift voucher for anyone willing to volunteer as an Access Officer.

Penrith City Council's Disability Access Improvement Program provides $35,000 annually to improve access to Council facilities and services. The budget covers the cost of making older Council buildings compliant with Australian building codes and other access requirements. This includes tactile ground surface indicators, adaptive equipment and technologies for Council libraries, sliding doors, hearing loops in Council Chambers, ramps, handrails adult change tables, and accessible toilet facilities.

2.3 Employment

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

Examples of actions might include:

- Designing all work as flexibly as possible, with a focus on achieving the desired outcomes rather than starting from required work methods, location, hours and so on

- Actively developing a respectful and welcoming work culture including flexibility and accountability for all staff in the way that they work as well as specific attraction and retention strategies

- Making diversity and inclusion a key consideration for strategic workforce planning and develop position advertisements that welcome disability
- Designing role specifications and recruitment processes to optimise the opportunities given to all applicants to demonstrate their merits against the job requirements
- Incorporating strategies and plans into learning and development opportunities as well as career planning
- Making equity and access key criteria for decisions about physical infrastructure, and information and communications technology
- Keeping inclusion front-of-mind when designing workforce management processes and practices
- Reasonable adjustment to the workplace to change a work process, practice, procedure or environment to support an employee with disability to perform their job (see www.and.org.au for further information on 'reasonable adjustment to a workplace').

Many people with disability do not wish to identify as having a disability when applying for a job as they fear a negative consequence. People with disability are more likely to respond to job advertisements that actively demonstrate a culture that is inclusive and disability conscious.

Practice examples – employment

Shoalhaven City Council is working to facilitate work opportunities for people with disability within council by developing targeted mentoring and work experience programs.

Penrith City Council has engaged with local disability employment providers to identify strategies to enhance opportunities for employment of people with disability. There are identified people with disability across and at all levels of Council's workforce.

Byron Shire Council has reviewed its recruitment procedures to support non-discrimination of people with disability. Council has also identified specific training needs and resources required to support current and future employees with disability.

Holroyd City Council has prepared a Reasonable Adjustment Policy and procedures to support an inclusive and flexible work environment that supports and values diversity. It identifies adjustments to the workplace environment or working arrangements such as an agreement to provide flexible work practices, work area or job design, alternative duties or improved access and ensuring people with disability are not disadvantaged by restructuring or relocation of services.

2.4 Systems and processes

A common issue for people with disability is the difficulty in navigating systems and processes to access the services and supports they need in the community. Some of these difficulties stem from the quality of service and training of front line personnel, the systems and processes required to access services, and the lack of accessible options for communicating, accessing information or providing input or feedback. There can be confusion and significant differences in which services are provided by Local Government.

A number of communication formats should be considered to provide accessibility for people with a range of disabilities. For example:

Vision impairments – audio, audio description, Braille, Moon[2], telephone

Learning disabilities and literacy difficulties – audio, audio description, easy read, easy access, subtitles

Hearing – Auslan, subtitling, textphone, SMS

Co-ordination difficulties – large print, audio, audio description, telephone.

Web Content Accessibility Guidelines 2.0 (WCAG 2.0)

WCAG 2.0 is an international technical standard to make web content more accessible to people with disabilities. It relates to the information in a web page or application including:

- Natural information such as text, images and sounds
- Code or mark-up that defines structure and presentation.

There are three levels of conformance from Level 'A' (lowest) to Level AAA (highest) based on meeting the principles of web accessibility.

Federal and NSW Government agencies are required to be compliant with WCAG 2.0 AA by 2014. The *Disability Discrimination Act 2014* requires equal access for people with disability to information and online services through the web. There is a strong mandate on Local Government to work towards achieving compliance with WCAG 2.0 AA.

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

- Ensuring all service information is available in a range of formats to support different needs and capabilities
- Ensuring service users have access to communications supports such as hearing loops, touch screens and translation services
- Ensuring feedback and complaint mechanisms can be accessed by people with a range of disabilities
- Ensuring web content is compliant with at least conformance level AA in the W3Cs Web Content Accessibility Guidelines
- Providing a mechanism for feedback on access and inclusion in the council area.
- Ensuring internal systems and processes are designed to allow for inclusion of staff with a range of disabilities

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[2] Moon is a simplified raised line version of the Roman print alphabet particularly useful for young blind children with additional learning or motor difficulties or people who have lost their vision later in life.

- Using non-technology reliant communications methods such as local newspapers, letterbox drops and library information boards.

Practice examples – systems and processes

Singleton Council ensures that community consultation events are held in accessible venues and use a range of formats that consider the needs of people with hearing or vision limitations. Council's Community Engagement Strategy will also incorporate principles around the inclusion of people with disability.

City of Auburn is reviewing and implementing changes to make Council's provision of information more accessible, including providing news items and information in a range of accessible formats and providing a range of assistive technology facilities through its library services.

3 Disability inclusion action planning

3.1 Alignment with Local Government planning and reporting

Councils are encouraged to integrate disability inclusion within their IP&R process including ensuring that the disability inclusion action planning process and associated funding allocations are directly linked to their Delivery Program and Resourcing Strategy.

The IP&R framework requires councils to draw their various plans together, to understand how they interact and to get the maximum leverage from their efforts by planning holistically for the future. It recognises that council plans and policies should not exist in isolation but are connected and coordinated. Planning for inclusion and access needs to be considered a core component of this framework.

This table identifies how the elements of disability inclusion action planning could be reflected in IP&R documentation (councils may wish, however, to incorporate additional steps to address specific local conditions and priorities).

Table 1   Linking disability inclusion action planning to IP&R

Disability inclusion action planning element	IP&R documentation
Public statement of commitment to accessibility and inclusion promoting equal rights for all	Mayoral message/ Introduction - Community Strategic Plan
Vision for inclusion to be communicated across council, for councillors, staff, stakeholders and the broader community	Vision, mission and values - Community Strategic Plan
Principles of inclusion that outline council's specific approach given its operating environment, local community and staff profile. Principles are an important education tool to staff across council. They should clearly outline the intent of the organisation in regards to disability inclusion as well as the responsibility to consider disability inclusion in all operational and planning matters.	Strategic goals – Community Strategic Plan / Delivery Program / Community Engagement Strategy
Community and staff disability profile to demonstrate inclusion as well as identify priority areas and population groups.	Community and staff profile – Annual Report / Workforce Strategy (Resourcing Strategy)
Policy and legislative context including	Legal framework – DIAP guidelines

Disability inclusion action planning element	IP&R documentation
provisions and standards for people with disability that apply to council	and Delivery Program
Inclusive consultation strategy that directly engages with the disability community of all ages to identify real life solutions for inclusion	Community Engagement Strategy as part of the Community Strategic Plan
Strategies and actions for inclusion of people with disability that address each of the four focus areas of the NSW Disability Inclusion Plan.	Strategies and actions – Community Strategic Plan / Delivery Program/ Annual Operational Plan
Resourcing for actions including responsibility and budget allocation	Responsibility and budget – Resourcing Strategy, including Long-Term Financial Plan, Workforce Strategy and Asset Management Strategy and Plans
Evaluation framework (monitoring, reviewing and reporting) that addresses key performance indicators to assess actions within each plan	Measures (key performance indicators), targets, progress – Annual Report and End of Term Report

Figure 2   Relationship between the IP&R framework and Disability Inclusion Action Planning
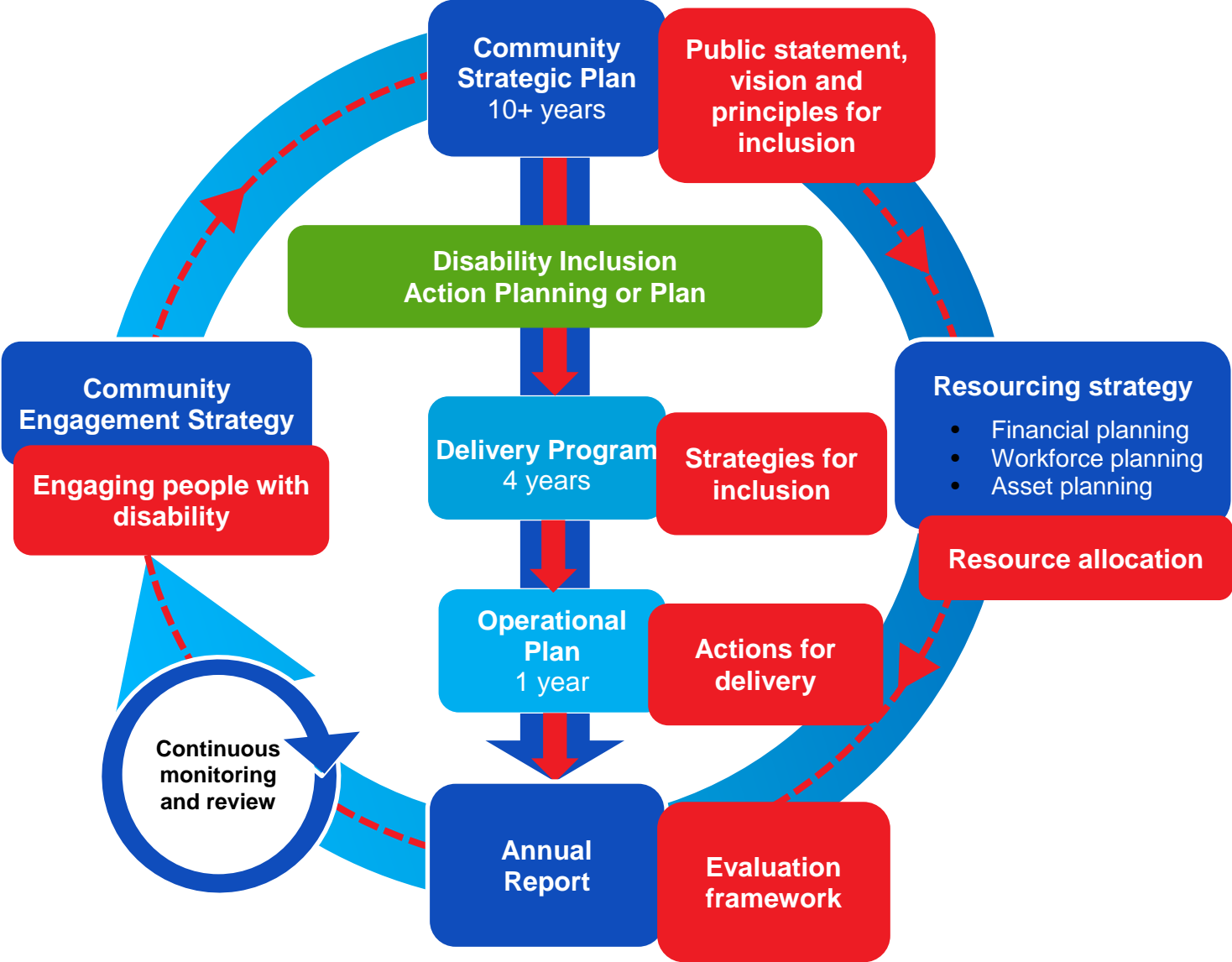
3.2 Action planning example

The table below provides a suggested approach for how issues associated with disability inclusion can be addressed within the IP&R framework.

Table 2   Examples of embedding disability inclusion within an IP&R framework

1: Key Focus Area – Attitudes and behaviours				
Community Strategic Plan - Goal	**Disability inclusion related principle**	**Delivery Program strategy – 4 years**	**Operational Plan action – 1 year**	**Performance measure**
1.1. An active cultural life	1.2. Council and community programs, events and facilities encourage participation of people of all abilities, and celebrate and value diversity	1.3. Work with local disability organisations and the community to make events, activities and facilities accessible and inclusive	1.4. Prepare inclusion and access guidelines for cultural and community events	1.5. Participation rates of people with disability in council programs and events (Data: event feedback)
1.6. A welcoming community	1.7. Council information and service represents best practice disability inclusion and social justice service provision	1.8. Investigate and provide training in best practice inclusion service for front-line and customer service staff such as BS 18477: Inclusive Service Provision	1.9. Develop specific training for front line and customer service staff to demonstrate competency in inclusive practice and service provision	1.10. Percentage of staff completed accredited inclusive service provision. (Data: Internal)
1.11. Key indicator: Percentage of residents with disability who are satisfied with council's customer service and ability to participate in council programs and events. (Data: Community survey)				

2: Key Focus Area – Liveable communities				
Community Strategic Plan - Goal	**Disability inclusion related principle**	**Delivery Program strategy – 4 years**	**Operational Plan action – 1 year**	**Performance measure**
2.1. An accessible community	2.2.The built environment is inclusive and accessible for people of all abilities	2.3. Progressively upgrade council owned assets to meet Access to Premises Standards or relevant best practice approach	2.4. Review and upgrade council's sub-district libraries to meet Standards.	2.5. Percentage of council owned assets meeting Access to Premises Standards (Data: building asset audit)
2.1. An accessible community	2.6. Essential public infrastructure meets the needs of people of all abilities	2.7. Review and progressively upgrade key designated accessible toilets.	2.8. Provide adult change facilities in at least three key destination public toilets within the LGA.	2.9. Percentage of public toilets that are accessible (Data: public facilities audit)
2.10. A mobile community	2.11. Ease of movement is available for people of all abilities	2.12. Review Continuous Accessible Path of travel (CAPT) in major shopping precinct of LGA	2.13. Conduct an Access Audit of shopping precinct and work plans to upgrade footpaths	2.14. Percentage of key destination footpaths that achieve CAPT standards.
2.15. Key indicator: Percentage of residents with disability who are satisfied with the accessibility of council owned assets and / or the wider physical environment Data: Community survey				

3: Key Focus Area – Employment				
Community Strategic Plan - Goal	**Disability inclusion related principle**	**Delivery Program strategy – 4 years**	**Operational Plan action – 1 year**	**Performance measure**
3.1. A community where people can work locally	3.2. Support employment opportunities and economic security for residents of all abilities	3.3. Employ and maintain a diverse workforce by making diversity and inclusion key to strategic workforce planning	3.4. Work with local disability employment providers to identify and remove barriers to council employment for people with disability	3.5. Proportion of council staff (self-identifying) as living with disability at each level of the organisation (Data: internal council staff audit)

3: Key Focus Area – Employment

3.6. A community that supports life-long learning	3.7. Support education and training opportunities for residents of all abilities	3.8. Identify and encourage pathways from education to employment, for people with disability	3.9. Host a youth, disability and employment information session for young people with disability who are about to leave school and enter the workforce	3.10. Proportion of school leavers with disability that have accessed council information or services (Data: community survey)

3.11. Key indicator: Employment rates of people with disability in the council
Data: demographic data

4: Key Focus Area – Systems and processes

Community Strategic Plan - Goal	Disability inclusion related principle	Delivery Program strategy – 4 years	Operational Plan action – 1 year	Performance measure
4.1. An informed community	4.2. Council information is accessible to people of all abilities in the community	4.3. Provide council information in a range of formats that provides best practice accessibility to services and support for people with disability.	4.4. Audit and revise council's website to be compliant with WCAG 2.0 AA.	4.5. Accessibility of council's website against WCAG 2.0 AA (Data: web audit)
4.1. An informed community	4.2. Council information is accessible to people of all abilities in the community	4.3. Provide council information in a range of formats that provides best practice accessibility to services and support for people with disability.	4.6. Publicly produce significant documents in a range of formats.	4.7. Percentage of council documents that are accessible.
4.8. A participatory community	4.9. People of all abilities have the opportunity to participate in	4.10. Progressively upgrade council provided	4.11. All major meeting rooms and council's chamber fitted	4.12. Percentage of council provided community

4: Key Focus Area – Systems and processes				
	democratic and community processes	community meeting spaces	with a hearing loop.	meeting rooms fitted with a hearing loop.
4.13. An engaged community	4.14. People of all abilities can share their views on local issues by participating in council's consultations and committees	4.15. Ensure council's community engagement program is accessible and inclusive	4.16. Provide training for council staff on inclusive community engagement 4.17. Advertise meetings and consultations in a range of formats and hold events in accessible venues	4.18. Participation / attendance rates of people with disability in consultations and committees (Data: consultation feedback)

4.19. Key Indicator: Percentage of people with disability who are satisfied with the level of access to council services and information.
(Data: Community survey)

3.3   Regional cooperation

Establishing relationships and partnerships across Local Government Areas provides an opportunity to share learnings and build a community of knowledge.

Councils have identified limited resources, such as dedicated and professional disability inclusion staff, and funding shortfalls as one of the major barriers to the effective implementation of disability inclusion action planning. This is particularly the case in regional and rural communities, where distances and a scattered disability community impact on the effectiveness of a business case for inclusion of people with disability. Opportunities should be explored for efficiencies through sharing information as well as human and financial resources across Local Government Areas. There are also a number of grant and funding opportunities which prioritise regional Local Government cooperation.

Regional cooperation between councils has involved a wide range of external and internal organisational functions such as research, service delivery, information exchange and political advocacy. All of these activities should incorporate disability inclusion, including sharing the services of a dedicated officer with expertise in inclusion planning across a number of Local Government regions.

Joint Organisations

Joint Organisations (JOs), part of the NSW Government's endeavour to strengthen Local Government across the State, are intended to provide a forum for councils and the State to work together on issues that cut across traditional council boundaries – such as jobs, education, housing, roads and transport.

It is envisaged that JOs will help to connect local priorities from council Community Strategic Plans with regional planning for growth, infrastructure and economic development. Joint Organisations will have three core functions:

- Regional strategic planning
- Working with State Government
- Regional leadership and advocacy.

While the disability inclusion action planning process needs to take place at the council level, it will be useful for councils to consider the potential of strategic planning and delivery at a regional level as the JO model matures. Particularly important will be the likely role of JOs in working with the State government and connecting councils' priorities for their communities to wider regional and sub-regional strategic plans.

There are other avenues for increased regional and state cooperation to drive service and planning issues related to inclusion of people with disability. This includes working with FACS district officers to drive coordinated regional approaches between councils and the state government in respect to a number of joint issues such as accommodation, health and carer support. Implementation of the NDIS is also likely to increase coordination of service delivery across Local Government boundaries, as well as between councils, state and national government and disability peak organisations.

4 Planning and implementation

This section outlines a step-by-step approach to assist councils with the disability inclusion action planning and implementation process.

Each council needs to consider their specific operating context, existing planning cycles and objectives and adjust this approach for development and implementation accordingly.

Step 1: Allocate ownership and responsibility

⬇

Step 2: Map functions, facilities, services and information sources

⬇

Step 3: Establish governance and accountability

⬇

Step 4: Undertake inclusive consultation and co-design

⬇

Step 5: Undertake a risk assessment and develop a mitigation strategy

⬇

Step 6: Develop strategies and action for inclusion

⬇

Step 7: Prepare an evaluation framework

⬇

Step 8: Publish the process

⬇

Step 9: Promote to staff and the community

⬇

Step 10: Implementation of actions

4.1 Disability inclusion action planning and implementation process

Step 1: Allocate ownership and responsibility

Before allocating specific responsibilities in development and implementation, at least one executive level sponsor should be identified within council. This might be the Mayor, Councillor, General Manager or another staff member at the executive level. The sponsor(s) will champion the importance of inclusion planning for people with disability throughout council, assume overall accountability for resourcing and planning decisions, and commit to driving the disability inclusion action planning process.

Disability inclusion action planning should be sponsored and championed at the executive level to position inclusion planning as integral to all actions and processes.

A lead officer or project manager should be identified to lead development and implementation of the action planning process. They will act as a coordinator and primary resource for the process. Whether acting within a multi-disciplinary working group or as a sole project officer, it is important they clearly map out the proposed disability inclusion action planning process and gain sign off from the Executive.

Disability inclusion action planning requires a range of skills and expertise across council's service areas such as community consultation, strategic and operational planning, engineering and organisational change. Whether the action planning process is managed by a single officer or a team it will require input and carriage from staff across council. It is therefore essential that an internal and on-going education and communication strategy is designed and delivered in parallel with the action planning process to build understanding and support for inclusion.

Councils should identify how they will provide a multi-disciplinary, cross-organisation approach to support the disability inclusion action planning process.

Multi-disciplinary input

There are a range of options that councils could use to incorporate cross-council feedback into its disability inclusion action planning process, such as:

- Multi-disciplinary project steering group
- Initial cross-council planning workshop
- Regular cross-council consultation activities (one-on-one meetings / staff surveys and feedback mechanisms)
- Cross-departmental presentations.

Council could also consider bringing in outside expertise to assist in the disability inclusion action planning process where appropriate. This could include people with disability, representatives of disability organisations, or members of council's access committee.

Step 2: Map your functions, facilities, services and information sources

For an effective disability inclusion action planning process, a clear picture of council's overall operating environment and opportunities for improved inclusion should be identified.

Prepare a list of each service area's operations, including programs, facilities, public information sources and services. In addition, typical service user pathways should be identified.

Once each service area is documented:

- Identify any existing barriers and opportunities for improved inclusion

- Prepare actions, resources, strategies and approaches to improve inclusion

- Review through consultation with staff or community members with disability and the disability sector.

Resources must be allocated for disability inclusion action planning development and implementation.

Step 3: Establish governance and accountability arrangements

In order for disability inclusion action planning to be successfully implemented and drive real and lasting change, the governance and accountability arrangements must be established early and communicated clearly. This will involve articulating the disability inclusion action planning process and management responsibility for delivery to council's executive and the community. Clarifying how disability inclusion action planning will be integrated with implementation and reporting of the IP&R framework is also important, including whether a disability inclusion action plan or action planning process will be undertaken.

Governance and accountability arrangements may involve specific processes such as:

- Incorporating inclusion outcomes (e.g. percentage of employees with disability, in senior management contracts and performance documents)

- Allocating responsibility for action delivery within job descriptions

- Including quarterly updates of disability inclusion action planning implementation and progress as a standing item of council

- Providing a clear feedback and response mechanism for the disability community to review and comment on the development and implementation of the disability inclusion action planning process.

Governance and accountability structures should link disability inclusion planning, implementation and reporting directly to the executive level of council and to people with disability in the community.

Step 4: Consultation and co-design with customers, staff and the community

An essential element in the disability inclusion action planning process is community consultation and engagement. This ensures the plan is focused on the needs of staff, customers and the community. Councils already have a good knowledge of their community and its characteristics, which can be used as a starting point for consultation. When done well, consultation will respect the lived experience of people with disability, empower people to influence the direction of their lives and encourage full participation to enable the identification of barriers and propose solutions.

> **Section 12 of the DIA mandates that disability inclusion planning should be done in consultation with people with disability.**

Consultation and engagement takes time and skill to do well. Consultation with communities and staff with disability is essential in the disability inclusion action planning process, and when considered carefully and included in the early planning stages it adds great value to the process.

It is important to ensure that engagement is not tokenistic or one-off but part of a broader strategy to include people with disability on a range of issues within the community. The rights of people with disability should be respected to be involved in decision making that affects their lives, as well as their right to not participate.

Council can establish engagement guidelines to address inclusion of people with disability within the broader Community Engagement Strategy or develop a separate detailed consultation plan.

When considering any consultation, the following principles should be considered:

- Always make the purpose and scope of consultation clear, including the level of engagement (IAP2 spectrum[3] from inform to empower)

- Create a stakeholder matrix to clarify who should be engaged and the priority issues. The audience for consultation will include internal stakeholders, (including staff, managers and executives), people with disability and carers/ families, service providers and peak organisations

- Take into account a variety of access and communication requirements to address the needs of all disability groups, including people with intellectual or cognitive disability or changing abilities due to ageing (see Links and resources: Section 5.1.3 physical access and Section 5.1.4 accessible communication)

- Be mindful that people with disability may require a longer lead time in which to organise transportation to the consultation or may require additional support to attend events

- Acknowledge the cost and value the participation of people with disability including providing reimbursement if possible

- Ensure participants are informed at consultations how their information will be used and report back to participants regarding the results and next steps of engagement

- Report on feedback of received throughout consultation process with details of whether they are included in the final plan and if not, why not.

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

The appropriate consultation methods will vary across NSW councils, depending on size, location, nature of services and service users and the purpose of the consultation. Consultation can be through formal or informal networks, however consider partnering with organisations such as Ability links and FACS District Officers to build on council processes.

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[3] The IAP2 Public Participation Spectrum sets out the level of participation in any engagement program. It assists organisations in clarifying the level of involvement and commitment to participation in decision-making for each element of the consultation strategy. Further information on the IAP2 spectrum is available at: www.iap2.org.au.

The focus needs to be on the quality of information being received rather than the type of consultation.

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

See also **Links and resources**: **Section 5.1.5. Engagement**

Disability consultative committees

A number of councils utilise a disability advisory group or access committee. These can either be structured with a Councillor chair, requiring a formal process of membership and organisation or more informally structured with no commitment required of Councillors but open to the general public to attend.

Formal committees provide a direct link to council's executive but may have limited scope to address issues outside their specific focus i.e. building accessibility. More casual forum processes are highly democratic and can address a wide range of issues but outcomes may not be considered by council.

Consultative committees can form an important part of the consultation process as they support long term relationship building and informed input from the community. Committees and forums however should be considered as one aspect of a broader approach to support the wider disability community engaging directly in action planning.

Section 12 of the DIA mandates that consultation with people with disability as part of the action planning process is documented. Engagement with people with disability is an essential and ongoing action that should be embedded into disability inclusion action planning. Ongoing engagement supports active involvement of people with disability and provides a mechanism for checking progress and providing feedback

The consultation summary should outline:

- Audiences/organisations involved in the consultation
- The methods utilised in the consultation process
- Brief description of the timeline, from start to finish
- A summary of the influence the consultation had on the content and structure of the disability actions within the IP&R framework or separate Action Plan
- Plans for ongoing consultation
- Accessible mechanisms for people with disability to provide feedback and suggestions over the life of the plan.

Step 5: Develop a risk mitigation strategy

Undertaking risk assessment and developing a risk mitigation strategy provides an opportunity to highlight and draft strategies to address disability inclusion priorities which require most attention and consideration by council. This includes consideration of risks to the design and implementation of the action planning process. This risk assessment in no

way replaces specific project and operational review of activities and service delivery which should be undertaken as a standard approach to action planning.

The first step in risk assessment and mitigation is to determine the level of management response required to address identified issues based on the potential impact of an incident and the likelihood of it occurring. In respect to disability the following consequences of failing to address a disability inclusion issue could be considered.

Table 3   Rating of severity based on the potential consequences of an incident

Rating	Description	Safety	Assets	Services	Reputation	Liability
1 Rare	Minor	Minor injury – first aid or minimal medical treatment	Minor alterations required	Minimal skills, capacity or technical upgrades required	Slight impact	Potential for minor regulatory fines
2 Unlikely	Moderate	Serious injury – hospitalisation	Significant alterations required across multiple assets	Significant skills, capacity or technical changes required	Local impact - local media/ visitor attention	Potential for significant legal/ regulatory fines
3 Possible	Major	Long-term illness or fatality	Major retrofit/ renovations required across multiple assets	Major skills, capacity or technical changes required – across a range of departments	State impact – State media/ government attention	Potential for major legal/ regulatory fines
4 Likely	Catastrophic	Multiple fatalities	Extensive retrofit/ renovations required across multiple assets	Extensive skills, capacity or technical changes required across council	National impact and media attention	Potential for criminal liability

Consideration of likelihood is based on whether the issue identified is likely to cause an incident. Ratings range from 'rare' (has never happened and is unlikely to take place) to 'likely' (have happened in the past and are highly likely to occur again).

These results are then cross-tabulated across a range of likely scenarios to determine priorities for management and mitigation.

Table 4   Example of management response matrix

Rating and impact	Response
Low priority: Minimal risk to council operations or services *E.g. Non WCAG 2.0 compliant website (Reputational/ services)*	Review mitigation measures. No additional formal management response required. *E.g. Identify timeline for audit and rectification of website compliance*
Moderate priority: Moderate risk to council operations or services *E.g. Major CAPT issues with local shopping centre due to outdoor dining provisions (Safety/ liability)*	Address mitigation measures and management steps required. *E.g. Review compliance with Australian standards and issue notices for rectification if required*
High priority: Significant risk to council operations or services *E.g. Major council assets non-accessible to people with disability (Safety/ assets/ liability)*	Address and provide regular updates of mitigation measures. *E.g. Develop asset audit and building retrofit program*
Highest response priority: Severe risk to council operations or services *E.g. Legal case based on DDA due to council non-compliance (Reputational/ liability)*	Review and update of mitigation measures – Report to the Executive of vulnerability. *E.g. Identify compliance issue/ work with peak organisations to establish solutions and seek settlement of legal issue.*

Staff and communities involved in the development of the Action Plan should be informed of the risk mitigation strategy, and asked to provide input before finalising. The risk mitigation strategy should be overseen by the disability inclusion action planning lead officer or executive level sponsor to promote an objective appraisal of risks.

Risk mitigation provides a process to develop options and actions to enhance opportunities and reduce threats to council.

Step 6: Develop strategies and actions for inclusion

Specific actions are to be determined based on the consultation process, the map of council functions, attention to whole of government actions and in consideration of council-specific priorities and strategic plans. Inclusion action planning must also demonstrate support for the goals of the NSW Disability Inclusion Plan.

For councils, it will be particularly important that inclusion objectives and actions link to the objectives of the Community Strategic Plan as well as the NSW Disability Action Plan focus areas (refer to Section 2).

For each action, the disability inclusion action planning process should identify the:

- Outcome area
- Action title and description
- Aim and expected outcome

- Target population or audience

- Timeframe for action to be commenced/achieved

- Individual/or area responsible

- Resources

- Specific and measurable indicators to assess performance

- Reporting requirements.

It is important strategies and actions are developed based on a practical assessment of resourcing capabilities and the needs of the community. Clarity around council's legislative and regulatory requirements will also assist in determining priorities for action.

Councils should look to regional cooperation and partnering with external organisations to support mutual objectives as well as identify potential grants and external funding opportunities. Working collaboratively with organisations and the community to develop strategies and actions will support an integrated approach to disability inclusion as well as a united commitment to implementation. This includes knowledge sharing across councils through case studies and provision of policy and program resources to support identification of disability inclusion best practice.

Step 7: Prepare an evaluation framework

A robust reporting and monitoring process that aligns with the IP&R framework is key to implementing the action planning process. It is suggested that councils identify four-yearly key performance indicators that can be integrated into the delivery program monitoring and reporting process as well as performance measures to be reported on annually.

> **Section 13 of the DIA stipulates that councils in NSW must include reporting on their disability inclusion action planning in their Annual Reports, and as soon as is practicable forward a copy of the relevant part of the Annual Report to the Minister.**

Annual reports by council will be part of a report tabled by the Minister on the implementation of disability inclusion action planning to Parliament. This report will be prepared as soon as practical at the end of each financial year.

Regular monitoring of disability inclusion actions will enable councils to:

- Amend their objectives and actions to reflect achievements and adapt and respond to new inclusion challenges

- Redirect attention and resources to areas where changes prove difficult to achieve

- Provide accurate and timely reporting

- Meet their obligations under the DIA including how disability inclusion action planning supports the goals of the NSW Disability Inclusion Plan.

Action Plans should include specific and measurable indicators of success for every action or group of actions and avoid the use of ambiguous timeframes, targets, indicators and responsibilities.

Monitoring and evaluation should be considered during the action planning process, to ensure actions are specific and measureable and appropriate data is collected.

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

- Identify appropriate key performance indicators for every action

- Identify all data sources required to regularly report the progress against each action, including developing strategies for additional data collection as required
- Determine the responsibility for reporting on the indicators against each action and the arrangements for collating data
- Seek executive level approval and sign-off on the incorporation of key performance indicators and monitoring / reporting arrangements within the Annual Report (and across the IP&R framework as required), to encourage support and commitment across council.

Ongoing engagement with those who are impacted by or benefit from actions provides a mechanism and valuable source of data by which to judge effectiveness.

> **Section 14 of the DIA requires councils to review their disability inclusion action planning process every four years.**

For councils, this has been designed to align with the IP&R framework and four-yearly review of the Community Strategic Plan.

Disability Inclusion Action Planning is dynamic process that should be regularly reviewed and improved, not a standalone document that is developed and shelved.

It is recommended at minimum, council conduct quarterly reviews to monitor progress, as well as 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 is also recommended. In addition, it is suggested that staff should revisit actions and monitor progress as a standing item on management agendas.

Step 8: Publish your disability inclusion action planning process

> **Section 12 of the DIA mandates that disability inclusion actions must be readily available to the public.**

Councils should publish their disability inclusion action plans in an accessible format and have in place strategies to provide information to those in the community who may have specific access or communication needs. Details of how to produce accessible documents are available in the accompanying fact sheet or on the FACS website.

> **Section 12 of the DIA mandates that councils must give a copy of their disability inclusion actions to the Disability Council NSW.**

For those councils that integrate their Disability Inclusion Action Plan into their IP&R framework this will mean ensuring they can identify and extract relevant objectives and actions from their Community Strategic Plan, Delivery Program and Operational Plan, as part of their disability inclusion action planning process, for submission to the Disability Council NSW and Annual Reports.

Whilst not mandatory, councils are also encouraged to lodge their disability inclusion action plans with the Australian Human Rights Commission as they list and provide links to all plans registered on their website. Over time this will create a community resource that councils will be able to access to inform future planning.

Step 9: Promote disability inclusion action planning to staff and the community

An investment should be made into raising awareness of key principles, strategies and actions within the plans (or the Action Plan) to councillors, staff and the broader community. These methods might include:

- Intranet

- Newsletters, local newspaper articles

- Awards recognising individuals involved in achieving disability inclusion targets

- Integration of disability inclusion action planning in induction processes.

Councils may also consider having a summary format of specific disability inclusion actions and processes for distribution to wider audiences. Summary documents should be in plain English and available in accessible formats.

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

Maintaining a focus on disability inclusion should also be addressed by councils. This may be incorporated into regular updates of implementation of the Community Strategic Plan or associated with a directed internal disability inclusion promotion and information strategy. Suggestions for ongoing performance reporting include:

- Preparation of a disability inclusion education and communication strategy (see Step 1) to run parallel to development and implementation of the action planning process

- Development of a dashboard to report on high level progress against actions and key outcome areas

- Case studies in print or through internal media, to communicate the impact actions are having on staff and residents

- Including a regular standing item within internal communications or council minutes regarding progress.

All of these items are potential actions which can be included in disability inclusion action plans.

Step 10: Implementation of actions

Effective implementation of inclusion planning involves cross-council accountability for delivery of actions. Incorporating strategies and actions into individual business and work programs will ensure staff are clear about roles and responsibilities to deliver on inclusion. This includes the staff member or staff members with the responsibility to track overall progress and outcomes of actions.

Promoting and reinforcing the principles of inclusion to staff members will also support on-going commitment and motivation to implementing actions. Council should seek an adaptive management approach to address any issues with delivering strategies and actions in a timely manner.

Maintaining executive level focus on implementation of disability inclusion actions is key to the on-going success of the action planning process.

Section 13 of the DIA states councils must provide a report on the implementation of the disability inclusion action planning approach in their Annual Report.

Successful implementation of disability inclusion action planning will require on-going collaboration and communication with the disability community and service organisations along with Federal, State and Local Government.

4.2   Compliance checklist

The following table provides a checklist of the mandatory requirements under DIA legislation for councils as part of disability inclusion action planning or a Disability Inclusion Action Plan.

Table 5   Disability inclusion action planning mandatory compliance checklist

Legislative requirements	Tick
Planning	
Have people with disability been consulted in the disability inclusion action planning process?	
Are there strategies and actions to provide access to buildings, events and facilities?	
Are there strategies and actions to provide access to information?	
Are there strategies and actions to support employment of people with disability?	
Are there strategies and actions to encourage and create opportunities for people with disability to access the full range of services and activities available in the community?	
Have you provided a report on your disability inclusion action planning consultation with people with disability to the Disability Council NSW?	
Do actions and strategies support the goals of the NSW Disability Inclusion Act?	
Has a copy of the disability inclusion action planning documentation been given to the Disability Council NSW?	
Is the disability inclusion action planning documentation publicly available?	
Reporting	
Is progress towards achievement of the action planning goals included in the Annual Report?	
Have FACS and the Minister for Disability Services been provided with a copy of the section of the Annual Report that details implementation of disability inclusion action planning?	

5 Additional resources

5.1 Links and resources

5.1.1 Disability inclusion action planning

Department of Family and Community Services have developed a range of resources to assist in disability inclusion action planning. They can be found here: www.facs.nsw.gov.au/reforms/developing-the-nsw-disability-inclusion-plan/disability-inclusion-action-plans

www.facs.nsw.gov.au/DIAP-Resources

Disability Network Forum has produced a resource to support disability inclusion action planning: www.ncoss.org.au/resources/DNF/forum/141203-NSWDNF-Disability-Inclusion-Action-Plan-Project.pdf

5.1.2 Evidence base for disability inclusion

Australian Bureau of Statistics collections on disability data are available www.abs.gov.au/ausstats/abs@.nsf/Lookup/4430.0Chapter2002012

The NSW Public Service Commission has released a report detailing the employment situation of people with disability in the NSW public sector, *Disabling the Barriers*. www.psc.nsw.gov.au/sector-support/equity-and-diversity/people-with-a-disability

The Australian Human Rights Commission overview of the history and aims of the Commonwealth Disability Discrimination Act 1992. www.humanrights.gov.au/our-work/disability-rights/guides/brief-guide-disability-discrimination-act

It also has publications on disability discrimination www.humanrights.gov.au/publications/disability-rights

5.1.3 Physical access

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

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

The Australian Human Rights Commission provides a range of resources on disability and access issues, including information about access to premises and other resources www.humanrights.gov.au

Vision Australia has developed a set of guidelines to improve access to public buildings by people with vision impairment which can be accessed www.visionaustralia.org/business-and-professionals/creating-an-accessible-environment/accessible-design-for-public-buildings

The Australian Network on Disability website has information about evacuation procedures for people with disability which can be accessed www.and.org.au/pages/evacuation-procedures.html

5.1.4   Accessible communication

The UK Government has provided an overview of accessible communication formats www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats

The W3C Guidelines for website design are available www.w3.org/standards/

The Australian Human Rights Commission also provides guidelines on accessible websites: www.humanrights.gov.au

Vision Australia has produced a guide to adaptive technologies for people with vision impairment, which can be accessed www.visionaustralia.org

Media Access Australia has produced a guide to show organisations how they can adjust and adapt their existing office systems, programs and equipment to make information accessible to people with disability www.mediaaccess.org.au/research-policy/guides/disabilitycare-service-providers-accessibility-guide

5.1.5   Engagement

The Australian Government has produced a guide to inclusive consultation for people with disability, **Inclusive Consultation: A practical guide to involving people with disabilities**.

Meetings and Events Australia has produced a guide to organising accessible events, **Accessible Events: A guide for meeting and event organisers**

The International Association for Public Participation provides several resources regarding public participation at the Resources section of their website: www.iap2.org.au

Privacy NSW has produced advice regarding privacy and people with decision making disabilities, **Best practice guide: Privacy and people with decision making disabilities**

The New South Wales Council of Social Services has produced a research report on improving public participation in NSW: **Have your say – but how?**

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

The Victorian Department of Human Services has produced a **guide Inclusive consultation and communication with people with a disability** on their website: www.dhs.vic.gov.au/for-business-and-community/community-involvement/people-with-a-disability-in-the-community

5.1.6   Language

People with Disability Australia guide to language relating to disability which can be accessed www.pwd.org.au/library/guide-to-reporting-disability.html

5.1.7 Employment

The Australian Public Service Commission has produced a guide to including people with disability in the workplace: ***Ability at Work, tapping the talent of people with disability***

The NSW Department of Family and Community Services publishes information about employing people with disability which can be accessed at: www.adhc.nsw.gov.au/individuals/inclusion_and_participation/in_the_workplace/employing_people_with_disability

JobAccess supports the employment of people with disability by providing information and advice for people with disability and their employers, which can be accessed at: www.jobaccess.gov.au/

Disability Employment Australia has collated resources about how to ensure that a workplace is an inclusive and supportive environment for people with disability, which can be accessed at: www.disabilityemployment.org.au

The Australian Network on Disability (AND) is a not-for-profit organisation resourced by its members to advance the inclusion of people with disability in all aspects of business: www.and.org.au
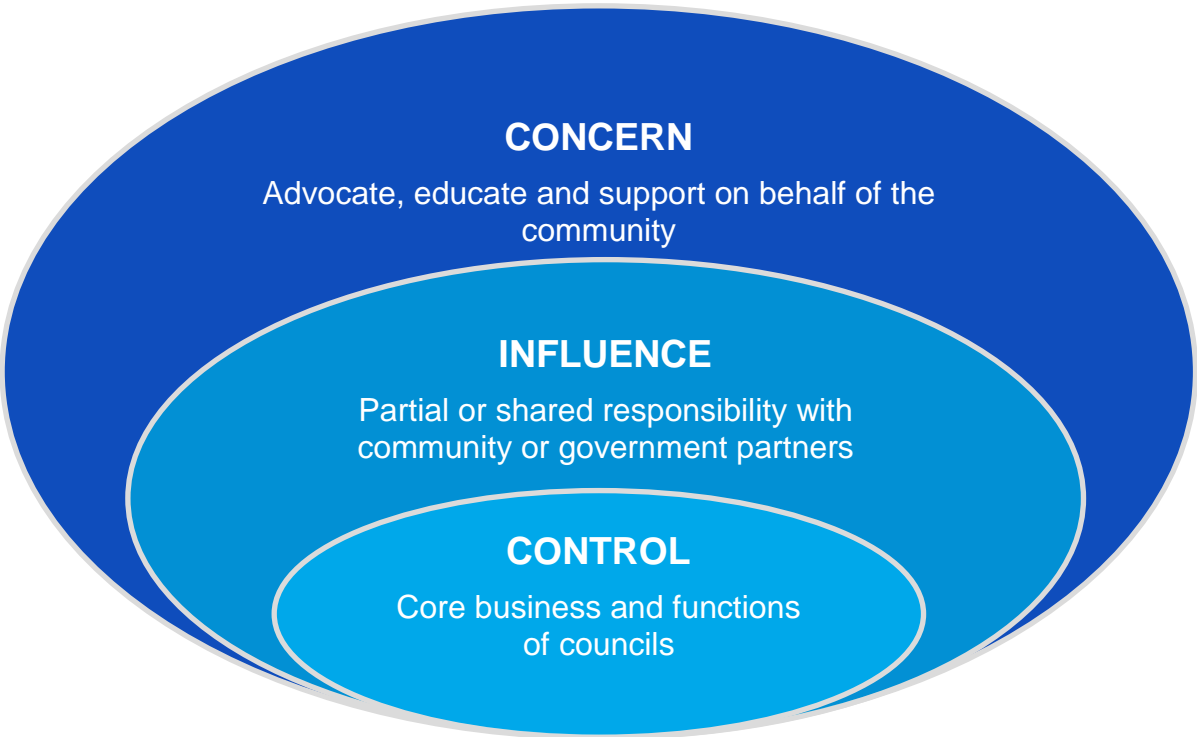
5.2　Performance indicators

Key performance indicators should be developed to support disability inclusion action planning based on the following criteria:

- **Suitability** - does the target provide a clear assessment of desired performance outcomes?
- **Availability** - can data for the target be readily and cost-effectively collected?
- **Reliability** - is the data easy to interpret and resistant to bias?
- **Replicability** - is the data consistent over a period of time?

One of the difficulties in collecting data on achieving disability inclusion outcomes is that people may not choose to identify themselves as having a disability. This may be for cultural, professional or personal reasons. Creating an inclusive community should provide a level of confidence and comfort in being able to request support due to disability. Providing the mechanisms by which a person can access services and contribute to the community without being singled out is integral. Nevertheless, indicators are an important tool in ascertaining the progress in implementing the disability inclusion action planning as well as in maintaining the profile and commitment to disability inclusion within council.

Another challenge for Local Government is that issues may be important and have a significant impact on people with disability but be outside of the direct control of council. It may still however be important to monitor these issues either as information for support and advocacy or as a broader reading of the wellbeing and inclusion of people with disability in the community.

Figure 3　Spheres of Council Influence

CONCERN
Advocate, educate and support on behalf of the community

INFLUENCE
Partial or shared responsibility with community or government partners

CONTROL
Core business and functions of councils

The **Draft Baseline Outcome Indicators for the National Disability Strategy NSW Implementation Plan** provides a useful resource for council to report on its performance. This can be accessed at: www.adhc.nsw.gov.au/

Table 6   Example performance indicators for Local Government

Focus Area	Measure	Data	Council role
Liveable Communities	Percentage of adults with disability who express satisfaction with accessibility of public areas.	Community satisfaction survey	Control
Liveable communities	People who experienced transport limitations in the last 12 Months: expressed as a percentage of the adult population	Community satisfaction survey	Influence
Liveable communities	Percentage of people with disabilities who are satisfied with local roads and footpaths.	Community satisfaction survey	Control
Employment	Percentage of people with disability employed (fulltime/ part-time/ casual)	Labour force data	Control/ Concern
Services and processes	Percentage of people with disability satisfied with level of consultation on local issues of importance	Community satisfaction survey	Control
Services and processes/ Attitudes and behaviour	Percentage of people with disability who participated in a community consultation activity	Consultation records	Control
Liveable communities/ Attitudes and behaviour	Percentage of people with disability who feel they have the opportunity to or have participated in arts and related activities in the local area	Community satisfaction survey	Influence/ concern
Liveable communities/ Attitudes and behaviour	Percentage of people with disability who feel they have the opportunity to or have participated in sports and recreational activities in the local area.	Community survey/ Sporting club records	Influence/ concern
Liveable communities/ Attitudes and behaviour	Percentage of people with disability who feel 'part of the community'	Community survey	Concern
Liveable communities/ employment	Percentage of people with disability who report having been provided options about where to live and work	Community survey	Concern

Focus Area	Measure	Data	Council role
Liveable communities	Percentage of people with disability who are able to see their families and friends when they want	Community survey	Concern
Attitudes and behaviour	Percentage of people with disability who can get help from friends, family or neighbours when needed	Community survey	Concern
Liveable communities	Percentage of residents with disability that have access to, and are satisfied with: a) Recreational facilities b) Community halls/ centres c) Libraries	Community survey	Control
Liveable communities	Percentage of households that contain at least one member with a disability that have housing costs 30% or more of gross income	ABS Census data	Concern
Liveable communities	Percentage of households that contain at least one member with a disability in the lowest 40% of household income range with housing costs of 30% or more of gross income	ABS Census data	Concern
Services and processes	Percentage of residents' with a disability who experience difficulty in accessing service providers	ABS social survey data	Influence/ concern

Appendices

A. **Abbreviations**

B. **Additional legislation**

A. Abbreviations

Abbreviation	Definition
ADA	*Anti-Discrimination Act 1977* (NSW)
AND	Australian Network on Disability
CSP	Community Strategic Plan
DAP	Disability Action Plan
DDA	*Disability Discrimination Act 1992* (Commonwealth)
DIA	*Disability Inclusion Act 2014* (NSW)
DIAP	Disability Inclusion Action Plans
DSA	*Disability Services Act 1993* (NSW)
FACS	Department of Family and Community Services
GSE	*Government Sector Employment Act 2013* (NSW)
ICT	Information and communications technology
IP&R	Integrated Planning and Reporting
KPI	Key performance indicator
LGNSW	Local Government NSW
NDIS	National Disability Insurance Scheme
NDS	National Disability Strategy 2010-2020
NIIC	NSW Interdepartmental Implementation Committee
OLG	NSW Office of Local Government
SDAC	Survey of Disability, Ageing and Carers
UNCRPD	United Nations Convention on the Rights of Persons with Disability

B.   Additional Legislation

Commonwealth Disability Discrimination Act 1992 (DDA)

The *Commonwealth Disability Discrimination Act 1992* (DDA) recognises the rights of people with disability to equality before the law and makes discrimination based on disability unlawful. The DDA covers many areas of life including employment, education, access to premises and provision of goods, services and facilities. DDA sections 60 and 61 set out the provisions for completing an action plan that fulfils the intent of the DDA and sets measurable and accountable goals.

Councils should deliver their disability inclusion action planning process under the DIA in such a way as to comply with both the DIA and the DDA.

Commonwealth Disability (Access to Premises — Buildings) Standards 2010

The Disability (Access to Premises-Buildings) Standards 2010 (Premises Standards) aim to ensure greater and dignified access to and use of buildings by people with disability as well as to provide certainty to the building industry in meeting its obligations under the *Disability Discrimination Act 1992*.

These Standards should be reviewed every five years to ensure their effectiveness in meeting their objectives and to identify any necessary amendments.

NSW Anti-Discrimination Act 1977 (ADA)

Under the *NSW Anti-Discrimination Act 1977* (ADA) it is unlawful to discriminate against someone or harass them, because of their own or their friends', relatives' or associates' past, present, future or presumed disability.

The law applies to:

- the types of services and facilities council provides and the way in which they are provided;
- Council meetings and decisions, including the way councillors treat each other; and
- Council's employment practices.

Local Government Act 1993

The *Local Government Act 1993* has Equal Employment Opportunity provisions that give councils specific responsibilities to plan for and achieve a diverse workplace. It also states that councils must adopt a code of conduct that incorporates the provisions of the Model Code of Conduct for Local Councils in NSW. Each council's code of conduct addresses minimum standards of behaviour for council officials (councillors, members of staff of councils, administrators, members of council committees, conduct reviewers and delegates of council) in carrying out their functions.

The Local Government Act 1993 and the Local Government (General) Regulation 2005 also sets out how Local Government is required to undertake its planning and reporting activities through the IP&R framework (see Figure 1). Social justice principles of equity, access, participation and rights are intrinsic to the delivery of the Community Strategic Plan.

Links to Government legislation and standards:

Local Government

- Model Code of Conduct can be accessed from the Office of Local Government

- IP&R framework is also accessed from the Office of Local Government

NSW

All NSW legislation including the *Local Government Act 1993* and *Local Government (General) Regulation 2005* can be accessed at: www.legislation.nsw.gov.au

Other important NSW Acts for assisting with action planning are:

- *NSW Disability Inclusion Act 2014*

- *NSW Anti-Discrimination Act 1977*

Commonwealth

All Commonwealth legislation can be accessed at: www.comlaw.gov.au

- Disability (Access to Premises - Buildings) Standards 2010

- *Disability Discrimination Act 1992*

Other useful links

- Web Content Accessibility Guidelines 2.0

- Universal Design Principles

- NSW Disability Inclusion Plan

- NSW Disability Action Planning

- National Disability Strategy