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Disability Access and Inclusion Plan (DAIP) Feedback

Department of Communities Western Australia

People With Disabilities (WA) Inc.

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People with disabilities WA (PWdWA)

PWdWA is the lead member-based disability advocacy organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic

advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PWdWA is run by and for people with disabilities and aims to advocate for the rights and empower the voices of all people with disabilities in Western Australia.

Introduction

PWdWA would like to thank Department of Communities for the opportunity to provide feedback on their draft Disability Access and Inclusion Plan (DAIP). Department of Communities provides vital support to people with disabilities in the WA community. Creating an accessible and inclusive service is critical to achieving the goals set out in WA's State Disability Strategy 2020-2030.

Our submission is informed by the experiences of people with disability, their families and carers including our individual and systemic advocacy work and our networks within the WA disability sector. We have provided general comments and recommendations under each of the Pillars of the DAIP.

As a general comment we were disappointed to see the DAIP did contain any reference to co-design. WA's State Disability Strategy 2020-2030 clearly identifies co-design as the good practice approach to meaningful involvement of people with disabilities.¹ We would expect the Department of Communities DAIP to clearly identify co-design as a targeted strategy in the various Pillars. We also recommend the Department of Communities works with people with disabilities to establish guidelines as to when co-design is required.

Pillar 1: Participate and contribute

1.1 All community members can participate in public consultation conducted by us

The lack of reference to co-design under Pillar 1 is particularly disappointing. Co-design is good practice for engaging people with disabilities in decision making, especially when planning services.

¹ Government of Western Australia. State Disability Strategy 2020-2030. <https://www.wa.gov.au/system/files/2021-05/State-Disability-Strategy-2020-2030.pdf>. Page 74-75.

Recommendation 1

Amend the first Action under Point 1.1 to clearly identify co-design as one of the approaches to be used in creating strategies and planning services.

1.2 All community members are encouraged to pursue employment opportunities with us

PWdWA would like to see a commitment in the DAIP to supporting the career progression of people with disability into leadership roles. Research shows that people with disabilities do not have the same opportunities as others for professional development and training in workplaces as well as experiencing other barriers to career progression.² The *People with Disability: Action Plan to Improve WA Public Sector Employment Outcomes 2020-2025* identifies expanded opportunities as a targeted action required by agencies. Action 2.8 specifically requires agencies to:

Proactively give people with disability opportunities to participate in mobility and development programs such as peer mentoring, university placements, secondments, internships, work experience and projects³

We believe this requirement could be better reflected in the DAIP, demonstrating the Department of Communities commitment to diverse leadership.

Recommendation 2

Include the following action:

Increase the percentage of people with disability in leadership positions by proactively giving people with disability the opportunity to participate in mobility and development programs.

² Disability Leadership Institute. July 2016. Survey of Australian Disability Leaders. <https://disabilityleaders.com.au/wp-content/uploads/2018/02/survey-summary-February2017.pdf>; Christina Ryan. February 2018. Westpac Social Change Fellowship Report. <https://disabilityleaders.com.au/wp-content/uploads/2018/02/WestpacSCFellowshipReport-CRyan-February2018.pdf>

³ <https://www.wa.gov.au/system/files/2020-09/People%20with%20Disability%20Action%20Plan%202020-2025.pdf>

The People with Disability: Action Plan to Improve WA Public Sector Employment Outcomes 2020-2025 requires agencies to encourage co-design when including people with disabilities in the review and design of agency practices. We feel the DAIP does not encourage best practice by setting the bar at consultation for employment resources.

Recommendation 3

Amend the action under Pillar 1.2 to require a co-design process to review and update resources to improve employee recruitment, retention, and training.

The DAIP requires that managers be able to optimise the work environment to meet the needs of employees. This includes a refresh of documents on the supply of specialise equipment, work related aids, adjustments, and flexibility. Equally important is that staff are aware of their rights, and policies and procedures relating to aids, adjustments, and workplace flexibility.

Recommendation 4

Include the following action point:

“Ensure people with disability are aware of their rights and can access the supports available to meet their employment needs.”

Pillar 2: Inclusive Communities

2.1 Our events and services are accessible to all community members

PWdWA believe the action point about planning, designing, promoting, and delivering events and services would be strengthened by the inclusion of co-design. While it could be said that co-design is included under the umbrella of these terms, it is important that co-design be specifically acknowledge as best practice for meaningful involvement.

Recommendation 5

Require co-design be used whenever it is an appropriate approach to achieving an outcome.

We are concerned about the use of the phrase “keep in mind” in the second action. This phrase does not suggest service users being at the centre of processes.

Recommendation 6

Amend the action point to:

“From the start, we will keep people who will use the service at the centre of our decision making.”

2.2 Our buildings and other facilities are accessible to all community members

Action point 1 under section 2.2 could be better aligned with WA’s State Disability Strategy which requires universal design for both new infrastructures, as well as progressive retrofitting of existing facilities to improve accessibility.⁴ The DAIP refers to external evaluations of building and facilities for access but does not definitively state that action will be taken to improve accessibility. Given the 5-year timeline of the DAIP we would expect to see steps taken to address accessibility issues in existing infrastructure.

Recommendation 7

Include a specific action to progressively retrofit or renovate existing infrastructure to improve accessibility.

The WA State Disability Plan is working towards Universal Design being a requirement for new builds. The use of the word “incorporate” suggests something as part of a whole. As such, its use ‘waters down’ the intention of the WA State Disability Plan.

Recommendation 8

Amend the action point to reflect a requirement for universal design in all new buildings and facilities.

⁴ Ibid 1. Page 40.

Pillar 3: Living Well

3.1 All community members will receive the same level and quality of service from our employees

Where the DAIP talks about enhancing the capacity of the community to participate in decision-making it is a clear opportunity to strengthen the Departments commitment to a co-design approach.

Recommendation 9

Require co-design be used, whenever it is appropriate, to ensure people with disability are central to decision-making about services that will impact them.

We also note that section 2.1, as it relates to accessible services, is also relevant to Pillar 3. Department of Communities provides several services such as housing, disability supports and child protection, which are fundamental to achieving the goal of Pillar 3. It may be helpful to acknowledge this connection in the DAIP.