



Purple Orange

**Submission in response to the draft
Disability Access and Inclusion Plan
2020-2024 of the Essential Services
Commission of South Australia**

29 September 2020

About the Submitter

JFA Purple Orange is an independent, social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people living with disability and their families.

Our work is characterised by co-design and co-production, and includes hosting a number of user-led initiatives.

Much of our work involves connecting people living with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially around policy and practice that helps ensure people living with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

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1. Overall observations

JFA Purple Orange is grateful for the opportunity to provide feedback on the Essential Services Commission of South Australia's draft Disability Action and Inclusion Plan 2020-2024. We believe the draft DAIP provides a solid foundation for the Commission to move towards greater accessibility and inclusion of people living with disability over the next four years. Below we have provided commentary and recommendations in relation to specific actions under the DAIP for the Commission's consideration.

1.1. Actions

To make it easier to identify specific Actions within the DAIP, we recommend each of the Actions are assigned a number. For example, the Actions under Outcome 1 could be numbered 1.1, 1.2, 1.3 etc, and the Actions under Outcome 2 numbered 2.1, 2.2, 2.3 and so on.

1.2. Language

Many of the draft DAIP's Actions and Measurable Targets are couched in language such as "the Commission will endeavour", "where reasonably practical" and "where possible". We believe the use of more specific language that gives a more concrete commitment will provide a greater incentive for Commission staff to seek out solutions to any issues identified when Actions are being implemented.

1.3. Targets

While the draft DAIP's targets are described as 'Measurable Targets', very few of them describe what the indicator for success is for that target. For example, the first Measurable Target in Outcome 2 refers to "proactive measures" being taken to ensure disability representatives are given the opportunity to be part of the Consumer Advisory Committee. This could be strengthened by setting a numerical target for the number of disability representatives that will be part of the Consumer Advisory Committee.

1.4. Co-design

A number of the draft DAIP actions refer to consultation with people who live with disability. While consultation can be an important tool, we strongly encourage the

Commission to take this further and apply co-design principles. In this context, co-design is a process that involves people living with disability (and where appropriate their families, carers and advocates) in defining, developing, implementing and reviewing a proposed change which aims to improve access, inclusion and participation. Employing principles of co-design will ensure that people living with disability are not just consulted to provide their views, but are actively engaged in the decision-making process. This would be more consistent with the State Disability Inclusion Plan, which sets out a commitment to co-design principles in Priority 6 (through the development of a toolkit that supports State authorities to consult and engage with people living with disability when developing policies and programs).

1.5. Monitoring and Review

The draft DAIP states it will be reviewed every four years, however there is no information about how the implementation of the DAIP will be monitored or reviewed as it is rolled out. We recommend the Commission establish a DAIP working group to undertake these monitoring and review activities. If the Commission establishes a DAIP working group, we strongly encourage the Commission to include people living with disability in the group. This was recommended by the co-design group (facilitated by JFA Purple Orange) that supported the Department of Human Services in developing the State Disability Inclusion Plan. This Plan, from which this DAIP is derived, promotes co-design, leadership opportunities and greater participation by people living with disability in decision making. For example, the Plan section on leadership and collaboration states that '[i]t is our aim that the perspectives of people living with disability are actively sought and that they are supported to participate meaningfully in government and community consultation and engagement activities.' Action 11 of the Plan requires State authorities 'to support young people living with disability to actively participate in decision-making.' We believe that in order for the DAIP monitoring and review process to be meaningful, it must include the voices of the DAIP's ultimate beneficiaries: people living with disability.

2. Specific recommendations

This section contains recommendations in relation to specific actions of the DAIP.

2.1. Outcome 1 – Accessible and Inclusive Communities

Action	Responsibility	Timeframe	Measurable Target
The Commission's website will be independently reviewed against the Web Content Accessibility Guidelines	Corporate Services Group	June 2021	The Commission website has been reviewed independently to assess its conformance with the Web Content Accessibility Guideline version 2.0

Recommendation 1: JFA Purple Orange recommends the Commission include as a measurable target not only the assessment of its website against WCAG version 2.0 but also the update of the website should this be required following the assessment.

Action	Responsibility	Timeframe	Measurable Target
Commission publications will, where possible, continue to be prepared using clear and inclusive plain English language	Lead by the Corporate Services Group in collaboration with all functional groups	Ongoing	Commission publications will be prepared following principles of the Commission's own Style Guide Manual and, where possible, the Australian Government Style Manual

Recommendation 2: The Commission’s commitment to communicating using clear and inclusive plain English language is welcomed by JFA Purple Orange. We note the Measurable Action caveats the production of publications in line with style manuals with “where possible”. We recommend the “where possible” caveat be removed so that all publications are prepared using clear and inclusive plain English language. The Commission may also like to consider including a further Measurable Action of producing publications designed for customers in Easy English in order to accommodate South Australians who do not have functional literacy.

Action	Responsibility	Timeframe	Measurable Target
The Commission will hold a staff presentation to increase staff awareness of the challenges experienced by people living with disability, particularly in relation to their access to services regulated by the Commission. This will be provided by an external person or agency (such as a disability support or advocacy service).	Corporate Services Group	December 2020	A staff presentation is held.

Recommendation 3: JFA Purple Orange welcomes the Commission’s commitment to increasing staff awareness about the challenges people living with disability face accessing services regulated by the Commission. We have a number of recommendations for the Commission to consider to strengthen this particular action in the DAIP:

1. The Commission should engage a person living with disability to deliver the training;
2. The training should be preceded by a staff survey in order to ascertain the level of staff knowledge about disability and identify priority areas for attention within the training;
3. The training should be delivered each year over the lifespan of the DAIP;
4. Changes in staff knowledge of and attitudes towards disability should be gauged by annual staff surveys.
5. The Measurable Target should include 100 percent of Commission employees receiving the training.

Please note that JFA Purple Orange has experience delivering staff surveys and is available to support the Commission, if this would be helpful. For example, we are delivering a series of three staff surveys throughout the life of the City of Adelaide’s 4-year DAIP. We have already delivered one of these and presented a detailed report of our findings to the Council, with recommendations. If you would like to discuss this further, please contact Rebecca Dowd, Policy and Research Leader, at rebeccad@purpleorange.org.au or 8373 8312.

JFA Purple Orange is also currently developing a comprehensive disability inclusion training package. This is being developed and delivered entirely by people living with disability. We will deliver a series of free sessions between February and June 2021, either in person or online (depending on COVID-19 restrictions). Should the Commission be interested in receiving free training, please contact Belle Owen at belleo@purpleorange.org.au or 8373 8312. Please note that spaces in this training are limited.

2.2. Outcome 2 – Leadership and collaboration

Action	Responsibility	Timeframe	Measurable Target
The Commission will endeavour to have disability groups better represented on the Consumer Advisory Committee.	Office of the Chief Executive Officer	May 2021	Proactive measures are taken to ensure disability representatives/advocates are given the opportunity to be part of the Consumer Advisory Committee and that a diverse range of community groups and interests are represented.

Recommendation 4: In order to strengthen this Action, JFA Purple Orange recommends the word “endeavour” is removed. The Commission could increase the measurability of its target here by setting out the number of people living with disability/representatives/advocates it will include in the Consumer Advisory Committee, or what proportion of membership of the committee will be made up of people living with disability/representatives/advocates.

Action	Responsibility	Timeframe	Measurable Target
The Commission will continue to promote and foster diversity and cultural awareness within the workplace.	Leadership Team and manager	Ongoing	Staff are aware of the benefits of promoting workplace diversity.

Recommendation 5: In order to improve the likelihood of this Action being achieved, JFA Purple Orange recommends that the Measurable Target include a way to measure staff awareness of workplace diversity and cultural awareness and their benefits. This could be achieved by staff surveys.

Action	Responsibility	Timeframe	Measurable Target
<p>The Commission will develop a list of agencies or groups that can assist in understanding the needs of consumers who are living with disability, including specific groups that specialize in assisting Aboriginal and Torres Strait Islander people, children, women, cultural and linguistically diverse people and children who are living with disability.</p> <p>These agencies or groups will then be contacted when the Commission is (undertaking) public consultation following the release of a draft Code, Guidelines or other consumer protection publication.</p>	Lead by the Corporate Services Group in collaboration with all functional groups	February 2021	<p>A list of relevant agencies or groups is created.</p> <p>The relevant agencies or groups are contacted for consultation when required.</p>

Recommendation 6: JFA Purple Orange is encouraged to see the Commission will engage with agencies that can assist in understanding the needs of people living with disability following the release of a draft Code, Guideline or other consumer protection publication. We recommend the Commission go beyond consultation when Codes, Guidelines and consumer protection publications/policies are released, and apply co-design principles to

work alongside people living with disability, their families and carers. This would ensure that people living with disability are not just consulted to provide their views, but are actively engaged in the decision-making process. This would be more consistent with the State Disability Inclusion Plan, as explained above.

The Commission could also consider setting up an advisory panel of people living with disability and advocates. This could serve as a reliable, ongoing sounding board for the Commission, provide advice and information on key issues, and help with developing and reviewing programs, policies, and systems. This model has been tested with great success. For example, some local governments have advisory panels (such as the City of Adelaide), and the Local Government Association will soon establish a panel to provide advice across local government. JFA Purple Orange will support the LGA with this and could similarly provide advice and support to the Commission.

2.3. Outcome 3 – Accessible communities

Recommendation 7: JFA Purple Orange is encouraged by the Actions in Outcome 3, including the Commission’s wish to improve the accessibility of their facilities, publications and public consultations. We note the Vision of the Commission at paragraph 5.1.2 of the DAIP is to “assist people living with disability to access *all* of the resources and services offered by the Commission” (emphasis added). However, each of the Actions in Outcome 3 are couched in language such as “endeavour”, “where reasonably practical” and “where possible”. In order to strengthen the DAIP, JFA Purple Orange strongly recommends the Commission use more specific language to describe its Actions and Measurable Targets. This will provide a greater incentive to seek out solutions to any issues identified such as the inaccessibility of locations for public consultations or publications prepared by the Commission. In relation to locations for public consultations, there are many venues in South Australia that can accommodate a diverse range of accessibility needs. JFA Purple Orange would be pleased to work with the Commission to identify suitable venues for your public engagement activities and can provide advice to the Commission about making meetings and events more accessible.

2.4. Outcome 4 – Learning and employment

Action	Responsibility	Timeframe	Measurable Target
The Commission will review the key conditions of employment policies relevant to recruitment to ensure that the recruitment processes are accessible and responsive to the needs of all applicants and employees, including those living with disability.	Corporate Services Group	May 2021	Appropriate recruitment policies and practices that encourage and increase inclusion and participation by existing and potential employees are in place.

Recommendation 8: Employment policies and practices are an essential component to improving workplace accessibility and diversity. JFA Purple Orange believes the Measurable Target for this Action could be strengthened by setting out how the policies and practices will be evaluated to assess their effectiveness and modified accordingly. The Commission could also consider implementing a recruitment target linked to workplace diversity, such as people living with disability making up 10 per cent of Commission employees by 2024.

Action	Responsibility	Timeframe	Measurable Target
The Commission will promote the DAIP to all existing and new employees.	Corporate Services Group	Ongoing	Information about the DAIP is included in the induction program and available on the Commission's intranet.

Recommendation 9: A key driver of the success of the Commission's DAIP will be employee understanding of its purpose and commitment to achieving its measurable targets. In addition to providing information about the DAIP on the Commission's intranet, JFA Purple Orange recommends the Commission deliver a presentation on the DAIP to all staff. The Commission could also consider setting a target of 100% of all existing and new staff receiving information about the DAIP from the Corporate Services Group, rather than placing the onus on employees to proactively seek out the information on the intranet.

Action	Responsibility	Timeframe	Measurable Target
The Commission will provide existing staff with the opportunity to complete an e-learning module regarding disability awareness and the module will be added to the induction process for new employees.	Corporate Services Group	Ongoing	A record of existing staff participation in the e-learning (module) is kept and all new staff complete the e-learning as part of the induction process.

Recommendation 10: JFA Purple Orange is encouraged by the Commission’s proposed e-learning module for staff. We recommend that all existing staff be required to complete this training, rather than just being given the opportunity as currently suggested in the above Action.

3. Conclusion

Thank you for the opportunity to provide feedback on the Commission’s draft DAIP. Should you wish to discuss our submission further please do not hesitate to contact Skye Kakoschke-Moore, Policy & Research Leader on (08) 8373 8317 or skyek@purpleorange.org.au.

We wish you all the very best with this important work.