

Section 3 - staff profile - I don't see the point of this, it isn't explained why this information is relevant to the plan, therefore it is irrelevant to the reader. I know its in the template you were given, but if you don't explain why this information is relevant to the outcomes of your plan you probably don't need to have put it in.

section 4.2 - "Further, the Commission acknowledges and addresses, within this DAIP, the particular risks that relate to women, children, Aboriginal and Torres Strait Islander people and culturally and linguistically diverse people living with disability."

You don't give any indication of how specifically this will be done; "The relevant agencies or groups are contacted for consultation when required. " - This plan should outline the situations when consultations with those are required to give your staff and the public an indication of when it should be done, the way it is currently written is open to interpretation and is therefore unlikely to be conducted any differently than it is now.

Section 4.3 - Strategic Context - the numbering of the points isn't correct, (your proof readers should be sacked 😊).

section 4.3 - "*1.1.1 supporting all people living with disability to access essential services on fair and reasonable terms that meet their individual needs*" who determines what is fair and reasonable, if it's you, please explain in your plan how your strategy determines what is deemed fair and what is deemed reasonable. Your idea of fair and reasonable may be different to mine. If it is your disability audience who decides, do you really want to give them that much control over what you do?

5.2 - I like the idea that people / functional groups have been identified as the relevant party, but you don't explain how they will be held accountable. Will they be monitored through KPI's or task management plans...? I would like to see clearly defined expectations for your staff, without them, let's be realistic, no one will accept them as their responsibility.

6.1 - You say a review will take place, but there is no commitment to actually change anything as a result. You also note that the review will be conducted in line with the web access guidelines... but you don't say that you'll engage with people with a disability. In fact when I read through the action items under 6.1 I cant find any action that actually directly links to three priority items nominated for that section (Priority 1: Involvement in the community Priority 2: Improving community understanding and awareness Priority 3: Promoting the rights of people living with disability). Your plan doesn't explain how each action item delivers on the priority items, I think that is probably because they don't. As an example:

"The Commission will hold a staff presentation to increase staff awareness of the challenges experienced by people living with disability"

This action does not meet Priority 1 - improve involvement in the community, nor does it improve community understanding and awareness which is priority 2, maybe it does a little bit meet priority 3, and promote the rights of people living with disability, but, it only for the benefit of your staff, and not to the wider community, which this legislation is designed to do.

In all of your action sections 6.1 through to 6.4 you you suffer from the same issues as above. You probably need to review the action items in each case and ask if they actually deliver on the priority areas. You

appear to have taken a very simplistic approach to the actions, which are unlikely to have any lasting impact to the disability access and inclusion culture in your organisation.

I also feel that your measurements are really vague and feel like a token effort. If challenged you'll probably find they aren't able to be measured in any way. For example;

"Accessibility to the Commission's premises and facilities is appropriately addressed." What does that mean, how is it measured, as a member of the public how will I know if this has been successfully delivered. How do you know if it has been appropriately addressed, what do you mean by 'appropriately', and to whom is it appropriate. This isn't a measurement it's a statement of where you'd like to be... a measurement would be "zero complaints received each year regarding access to building" or something similar.

Overall this feels like a very lacklustre effort of just checking the boxes for meeting legislation. The idea behind the legislation this time around is that organisations take a step to the next level, it's no longer ok to just meet the minimum. 1 in 5 people have a disability in Australia, if you think that each of those have family members and people who support them, how many do you think are impacted by disability daily, 2 in 5? 3 in 5? It is possible that this is a reality.

You also missed a key requirement from the state plan, <https://dhs.sa.gov.au/services/disability/inclusive-sa/state-plan>

9. Ensure induction of new State authority employees includes information about working with people living with disability.

You need to develop a training program for 'onboarding of new staff', so they are brought up to speed and educated about disability access and inclusion, you may want to add that to your plan.

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