

CREATING A DISABILITY ACTION PLAN



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As information gets updated, new versions of this document will be available on both websites

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CREATING A DISABILITY ACTION PLAN

As outlined in the Disability Discrimination Act 1992 (DDA), Disability Action Plans (DAPs) help to eliminate disability related discrimination. Writing a Disability Action Plan will help to highlight any discriminatory policies, procedures, attitudes and other barriers that may exist in your service.

In creating a DAP, it is vital to consult women with disability, making sure that their voices and opinions are heard and included in any new plans, policies and practices.ⁱ Consultation should include people with different impairments, including mental illness, to increase the chances of uncovering all barriers that need to be addressed. Likewise, collaborating with disability advocacy organisations or employing people with disability to assist in audit processes, would help to ensure that your DAP is as broad and inclusive as possible.ⁱⁱ Your DAP should schedule ongoing consultation with people with disability.

If existing policies and practices are not inclusive, a DAP can help you begin to improve your commitment to inclusivity for all.ⁱⁱⁱ Writing a DAP can help you come up with strategies as to how to address and overcome the barriers to access that it uncovers. All members of your service should be made aware of the DAP, as well as the steps they will each need to take to help implement the plan.

Ultimately, DAPs are most effective when they outline a timeframe within which changes are to occur, and when staff are allocated responsibility for certain alterations. Implementing realistic timeframes, allocating adequate resources, and performing regular audits will help keep the changes towards inclusivity on track, clearly monitoring whether various aspects of the plan have been completed, or whether they are still in progress. Such processes of continual evaluation and review are important elements, helping to ensure that the DAP has been implemented efficiently and appropriately.

In addition to regular audits, it is important to get into the habit of checking the physical accessibility of your service if and when things get moved around or changed.^{iv} Even relatively minor changes to the layout of the physical environment could create a barrier for women with disability. In turn, however, this means that changes to increase accessibility can also be quite minor. Indeed, there are many quick and manageable steps that can be taken which will help make your service more accessible for women with disability.

More detailed information concerning Disability Action Plans can be found at
<https://www.humanrights.gov.au/our-work/disability-rights/standards/action-plans/developing-effective-action-plan> and
<http://www.ncoss.org.au/resources/DNF/forum/141203-NSWDNF-Disability-Inclusion-Action-Plan-Project.pdf>.

Additionally, the Australian Human Rights Commission has compiled a ‘Register of Disability Discrimination Act Action Plans’, which is available at
<https://www.humanrights.gov.au/our-work/disability-rights/standards/action-plans/register-disability-discrimination-act-action>.

Your service can submit your DAP to this register, which could provide much needed information or ideas for the DAPs of other domestic and family violence services. Collaboration is key in ensuring that women with disability have access to a whole range of domestic and family violence services.

AUDIT THE SERVICE

Physical Accessibility Guidelines

Physical access is often seen to relate only to wheelchair access. This is problematic, as physical access must address the needs of women with a whole range of impairments, including physical, visual, hearing, cognitive and/or mental illness.

The following questions are a good starting point to help you consider what changes your service may need to make to ensure physical accessibility.

1. Physical Accessibility Outside The Service

- 1.1 Is there a wide, clear path towards the building? Yes No
- 1.2 Are there accessible parking spots for people with disability near the main entrance of the building? Yes No
- 1.3 Do pamphlets and informational materials map out the closest, safest and most accessible form of public transport to your service? Yes No
- 1.4 Is there a grassed area outside for toileting service dogs? Yes No

2. Physical Accessibility Inside The Service

- 2.1 Are floor surfaces hard and non-slip? Yes No
- 2.2 Are corridors wide, clear, free from clutter and obstacles? Yes No
- 2.3 If there are obstacles, such as poles, are they easily located by the use of a cane? Yes No
- 2.4 Are there warning or directional Tactile Ground Surface Indicators (TGSIs) near potential hazards? Yes No
- 2.5 Is furniture placed in sensible and consistent positions? Yes No
- 2.6 Is furniture located well out of the way of walkways? Yes No
- 2.7 Is furniture clean and intact? Yes No
- 2.8 Are pathways and doorways wide enough for a wheelchair user to navigate? Yes No
- 2.9 Is there sufficient room for a wheelchair to turn around in every area of the service? Yes No

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2. Physical Accessibility Inside The Service

- 2.10 Where there are handrails, are they painted a different colour from the wall on which they are located?
- 2.11 Are light switches, elevator buttons, doorknobs, power points and telephones located at appropriate heights?
- 2.12 Do elevator buttons have braille or tactile markings on them?
- 2.13 Is there an audio system in the elevator itself?
- 2.14 Do telephones have large numbers and an audible touch tone?
- 2.15 Are there signs (in large print or braille) identifying accessible bathrooms?
- 2.16 Are sinks, bench tops and cooktops at an appropriate height to allow a person who is sitting, or is of short stature, to use them comfortably?
- 2.17 Are soaps, hand driers or towels located at an accessible height?
- 2.18 Are there handrails in the bathrooms?
- 2.19 Is there a step into the shower?
- 2.20 Is the shower head hand held?
- 2.21 Are shower seats available if required?
- 2.22 Are kitchen utensils and appliances kept at an accessible level?
- 2.23 Are the insides of cupboards white to increase brightness and make it easier to find things?
- 2.24 Are contrasting colours used to identify obstacles or hazards?
- 2.25 Is there sufficient lighting in all rooms?

Yes No

AUDIT THE SERVICE

2. Physical Accessibility Inside The Service

- 2.26 Are lights installed in such a way that minimises glare?
- 2.27 Are lights installed in such a way that minimises shadows?
- 2.28 Do your smoke alarms take hearing impairment into consideration? For instance, is the alarm tone converted into flashing lights or a vibration?
- 2.29 Do you have a signalling mechanism that converts sound from alarm clocks and door bells into flashing lights?
- 2.30 Is your emergency evacuation plan available in alternate formats, such as braille, Easy English or audio recording? Consider getting someone to review your emergency evacuation plan and provide feedback as to how to make it better for people with various impairments.
- 2.31 Do you have assistive listening devices? Is there a hearing loop?
- 2.32 Are the women in the service informed about how their actions influence women with disability? For instance, ensuring that things are put back in their place after use can make life easier (and safer) for women with vision impairment.

Yes No

Additionally, any future changes to the physical layout of the service should emphasise universal design and keep in mind the diverse range of people who may one day use the service.¹⁹ Ensure that any changes abide by the National Construction Code (NCC) and the Disability (Access to Premises – Buildings) Standards 2010, as well as the standards outlined by Liveable Housing Australia.

For more detailed information about accessible environments, see Vision Australia:

<https://www.visionaustralia.org/business-and-professionals/creating-an-accessible-environment/accessible-design-for-homes> and

<https://www.visionaustralia.org/business-and-professionals/creating-an-accessible-environment/accessible-design-for-public-buildings>.

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Information Accessibility Guidelines

Information provided about and within your service should be accessible for women with disability. By considering the following questions, it is possible to make information more accessible for women with disability, as well as women from culturally and linguistically diverse backgrounds, and women with low literacy.

1. Accessibility of Print Information

- 1.1 Are your informative materials available in large print and braille formats?
- 1.2 Do you have Easy English alternatives for all informative materials?
- 1.3 Do your written documents conform to the guidelines provided by Vision Australia?(see links at the end of this page).
- 1.4 Are you distributing print materials in safe, public locations where people with disability are likely to access them?
- 1.5 Are you publicising the accessibility of your service? Consider providing this information in presentations, publications or brochures in a range of locations.

Yes No

Yes No

Yes No

Yes No

Yes No

2. Accessibility of Electronic Information

- 2.1 Does your informative material include pictures of women with various impairments?
- 2.2 Does your website meet the Web Content Accessibility Guidelines (WCAG) outlined by the World Wide Web Consortium (W3C)?
- 2.3 Is your electronic information accessible? Note: Microsoft Word documents are more accessible than PDFs.
- 2.4 Does your website provide audio recordings of information?
- 2.5 Does your crisis or telephone line have a TTY and people trained to use this technology?

Yes No

Yes No

Yes No

Yes No

Yes No

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3. Accessibility of Information at the Service

- 3.1 Are service entry forms available in alternate formats? Yes No
- 3.2 Is assistance available for those who require help filling out the necessary forms? Yes No
- 3.3 Is information about the service, rules and regulations available in alternate formats, such as braille, Easy English, large print or audio recording? Yes No
- 3.4 Is the induction able to be broken down into smaller segments to accommodate women with learning or intellectual disability? Yes No
- 3.5 Do you have assistive communication devices available for women with disability to use while in your service? Yes No
- 3.6 Do you have TTY and other assisted listening devices at your service? Yes No
- 3.7 Do televisions have closed-captioning text and staff capable of using this function? Yes No
- 3.8 Do your staff know how to access interpreters? Yes No

For more information about accessible and alternate print materials, see

<http://www.visionaustralia.org/business-and-professionals/print-accessibility-services/inclusive-communication-strategies> and

[http://www.visionaustralia.org/business-and-professionals/print-accessibility-services/alternate-format-production.](http://www.visionaustralia.org/business-and-professionals/print-accessibility-services/alternate-format-production)

For information about W3C and web accessibility, see

<http://www.w3.org/WAI/>.

For more information about how to ensure your printed material is in Easy English, please contact NSW Council on Intellectual Disability or Intellectual Disability Rights Service for referral to a consultant.

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Attitudinal Accessibility Guidelines

No single or overarching change will make your service accessible for all. However, attitudinal changes are incredibly significant in making services more accessible. As such, the following questions may help identify whether the staff at your service are demonstrating inappropriate attitudes, and thus embedding exclusionary practices.

1. Attitudinal Accessibility of the Service

- 1.1 Have staff members been informed about myths and stereotypes about disability, and how these can negatively impact their interactions with people with disability?
- 1.2 Have staff members been informed about how their language can impact people with disability? Encourage them to read PWDA's [Guide to Reporting Disability](#).
- 1.3 Are staff members aware of the many complex issues faced by women with disability who have experienced domestic and family violence?
- 1.4 Do staff members make assumptions about women with disability? Do they use a different tone of voice, or patronise these individuals?
- 1.5 Do staff members react indignantly when a woman with disability comments on an access problem she is having?
- 1.6 Do staff members interact well with other services which may be supporting a woman with disability?
- 1.7 Do staff members modify their interactions with women with disability to respond to their needs? For instance, do they slow down, use simpler language, and take more time as required?
- 1.8 Do staff members respond to disclosure of violence with disbelief, or doubt that it occurred?
- 1.9 Do staff members take the voices and opinions of women with disability seriously?

Yes No

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1. Attitudinal Accessibility of the Service

- 1.10 Are staff members required to participate in disability awareness training?
- 1.11 Are all staff members and volunteers trained to work with women with disability?
- 1.12 Are staff members encouraged to develop further skills to work with women with disability?
- 1.13 Are staff members confident communicating with and understanding women with a range of different impairments, including mental illness and/or a history of trauma?
- 1.14 Are staff members engaged in making your service more accessible?
- 1.15 Are staff members encouraged to engage in the service's Disability Action Plan?
- 1.16 Are staff members encouraged to contribute to best practice standards for interacting with women with disability?
- 1.17 Are staff trained to use assistive technology and disability equipment?
- 1.18 Are women with disability represented in the service's staff? If not, how can attitudes and stereotypes be addressed to allow for equal employment opportunities?

Yes No

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Procedural Accessibility Guidelines

The needs of women with disability should be included within procedures and policies to ensure that they are not discriminated against further after gaining access to your service. Revise policies and consider how they can be changed so they don't (intentionally or unintentionally) exclude women with disability. The following questions should be considered when auditing the policies, procedures and practices of your service.

1. Procedural Accessibility of the Service

- 1.1 Are policies based upon inclusive definitions? For instance, does your service acknowledge that domestic and family violence can be perpetrated by paid and unpaid carers or support staff in a range of settings?
Yes No
- 1.2 Are women with disability asked about their accessibility needs upon arriving at your service? Are these needs met as quickly as possible?
Yes No
- 1.3 Do policies allow carers to accompany women with disability into your service?
Yes No
- 1.4 Do policies allow service dogs to accompany women with disability into your service?
Yes No
- 1.5 Do policies outline the protocol for accessing interpreters or assistive communication devices?
Yes No
- 1.6 Do policies and practices ensure that women with disability are as independent as they desire within your service?
Yes No
- 1.7 Do procedures outline that induction must be performed conversationally? Would it be possible to provide rules and regulations in writing or audio recordings instead?
Yes No
- 1.8 If the physical environment or layout of the service is changed at all, are there policies in place to ensure that people with vision impairment are made aware of these changes?
Yes No
- 1.9 Are there procedures or policies in place that outline your service's minimum requirements for accessible information?
Yes No

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1. Procedural Accessibility of the Service

- 1.10 Do programs discriminate against women with disability in terms of setting unrealistic timeframes or goals?
- 1.11 Can procedures be easily and consistently altered to make your service more accessible? For instance, changing how questions are asked or how information is provided.
- 1.12 Does your service have formal policies and procedures concerning disability, or do staff members rely on informal policies such as making their own personal accommodations when dealing with women with disability?
- 1.13 Do recruitment policies discriminate against women with disability?
- 1.14 Can recruitment policies and practices be changed to move towards equal employment and inclusivity?
- 1.15 Could your service employ a disability-specific case manager to assist women with disability?

Yes No

Yes No

Yes No

Yes No

Yes No

Yes No

We would like to acknowledge Carolyn Frohmader for all her previous work in this area which has substantially informed our work here. See also Frohmader, C. 2007. 'More than just a ramp: a guide for women's refuges to develop disability discrimination act action plans', Women With Disabilities Australia, http://wwda.org.au/wp-content/uploads/2013/12/More_Than_Just_A_Ramp.pdf.

A lot of the following resources have been drawn from the Stop the Violence Resource Compendium on domestic and family violence, available at <http://www.stvp.org.au/RC-Domestic-and-Family-Violence.html>.

The Stop the Violence Resource Compendium also provides more general resources concerning violence against women with disability. It is available at <http://www.stvp.org.au/Resource-Compendium.html>.

The questions used in this document have been adapted from

Frohmader, 2007; Hague et.al., 2007; Hoog, 2004; Vision Australia, 2014; WCHM et.al., 2009.

Endnotes:

ⁱ Hague, G., Thiara, R., Magowan, P. and Mullender, A. 2007. 'Making the links: Disabled women and domestic violence. Final Report', Women's Aid. <http://www.womensaid.org.uk/core/core_picker/download.asp?id=1763>

WDVCS (Women's Domestic Violence Crisis Service), 2012. 'WDVCS Disability Action Plan 2013-2016' Women's Domestic Violence Crisis Service. <[ⁱⁱ WCHM, DVCS, WWDAC and WESNET, 2009. 'Women with Disabilities Accessing Crisis Services'. <<http://www.pwd.org.au/documents/pubs/SBWWD.pdf>>](https://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&cad=rja&uact=8&ved=0CDUQFjAD&url=https%3A%2F%2Fwww.humanrights.gov.au%2Fsites%2Fdefault%2Ffiles%2FWDVCS%2520Disability%2520Action%2520Plan%25202013-2016.docx&ei=MmhZVP-FBIKdmwWCp4GICA&usg=AFQjCNETtLbF-v82WffYExvlyGSKIRe7mg&sig2=-ogoYunfP8O9xUI2MWiOA&bvm=bv.78677474,d.dGY></p></div><div data-bbox=)

ⁱⁱⁱ Frohmader, C. 2007. 'More than just a ramp: a guide for women's refuges to develop disability discrimination act action plans', Women With Disabilities Australia. <http://wwda.org.au/wp-content/uploads/2013/12/More_Than_Just_A_Ramp.pdf>

^{iv} Hoog, C. 2004. 'Increasing Agency Accessibility for People with Disabilities: Domestic Violence Agency Self-Assessment Guide', Abused Deaf Women's Advocacy Services for the Washington State Coalition Against Domestic Violence <<http://www.stvp.org.au/documents/Compendium/Domestic%20and%20Family%20Violence/hoog1.pdf>>

^v Healey, L., Howe, K., Humphreys, C., Jennings, C. and Julian, F. 2008. 'Building the Evidence: A report on the status of policy and practice in responding to violence against women with disabilities in Victoria', Women's Health Victoria and Victorian Women with Disabilities Network. <<http://www.wdv.org.au/documents/BTE%20Final%20Report.pdf>>

Vision Australia, 2014a. 'Creating an accessible environment: Accessible design for homes', Vision Australia. <<https://www.visionaustralia.org/business-and-professionals/creating-an-accessible-environment/accessible-design-for-homes>>

Vision Australia, 2014b. 'Creating an accessible environment: Accessible design for public buildings', Vision Australia. <<https://www.visionaustralia.org/business-and-professionals/creating-an-accessible-environment/accessible-design-for-public-buildings>>