CREATING A DISABILITY

ACTION PLAN



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The information in these documents was prepared by Meredith Lea, as part of

a collaboration between People with Disability Australia and Domestic Violence

NSW.

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. Writing a DAP can help you come up with strategies as to how to

iii

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.

1



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

Yes

Yes

No

No

1.1 Is there a wide, clear path towards the building?

1.2 Are there accessible parking spots for people with disability

near the main entrance of the building?

1.3 Do pamphlets and informational materials map out the

closest, safest and most accessible form of public transport

to your service?

Yes

Yes

No

No

1.4 Is there a grassed area outside for toileting service dogs?

2. Physical Accessibility Inside The Service

2.1 Are ﬂoor surfaces hard and non-slip?

Yes

Yes

Yes

No

No

No

2.2 Are corridors wide, clear, free from clutter and obstacles?

2.3 If there are obstacles, such as poles, are they easily located

by the use of a cane?

2.4 Are there warning or directional Tactile Ground Surface

Indicators (TGSI) near potential hazards?

Yes

No

2.5 Is furniture placed in sensible and consistent positions?

2.6 Is furniture located well out of the way of walkways?

2.7 Is furniture clean and intact?

Yes

Yes

Yes

Yes

No

No

No

No

2.8 Are pathways and doorways wide enough for a wheelchair

user to navigate?

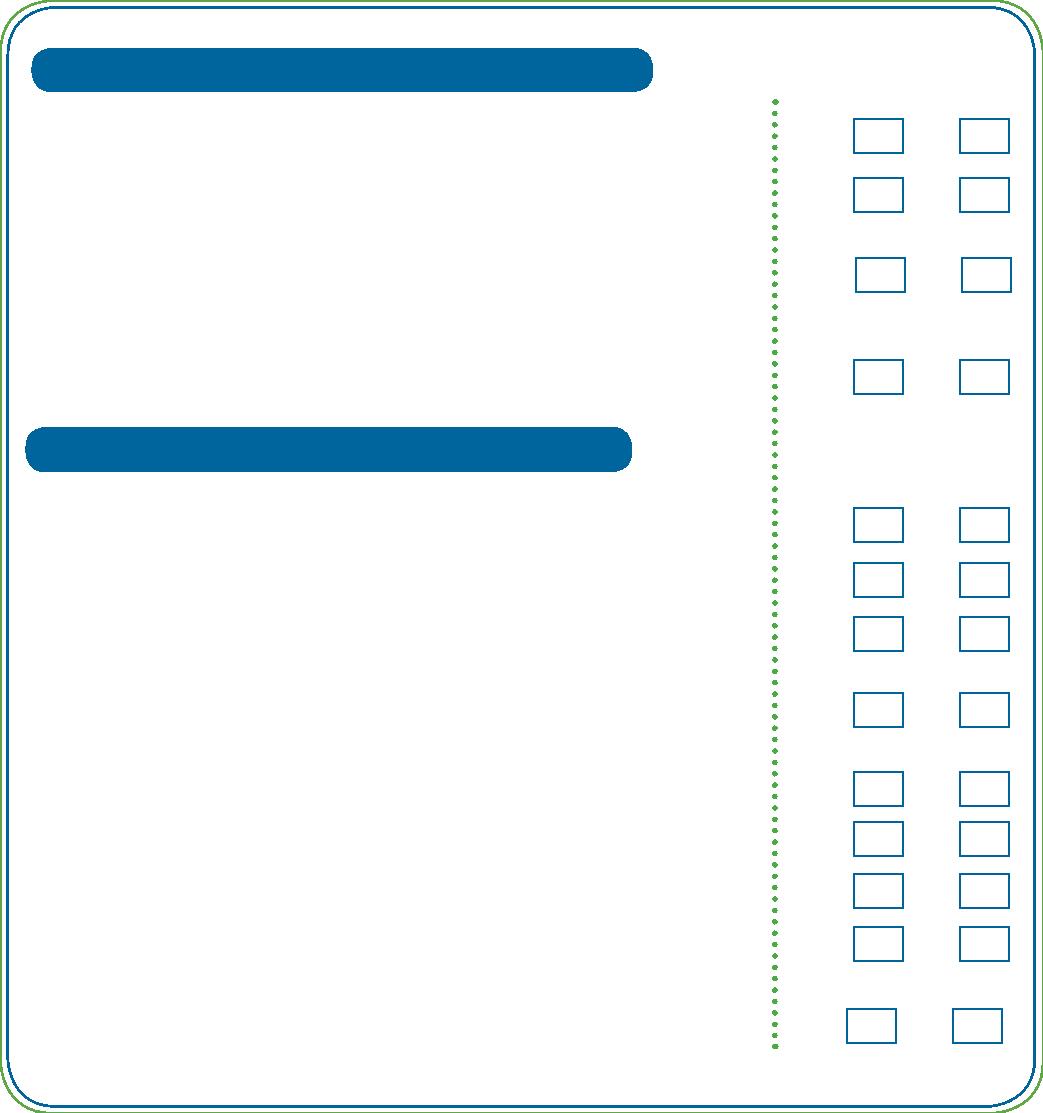
2.9 Is there sufﬁcient room for a wheelchair to turn around in

Yes

No

every area of the service?

2



AUDIT THE SERVICE

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?

Yes

Yes

Yes

No

No

No

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?

Yes

Yes

No

No

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?

Yes

Yes

No

No

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?

Yes

No

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?

Yes

Yes

Yes

Yes

Yes

No

No

No

No

No

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?

Yes

Yes

Yes

No

No

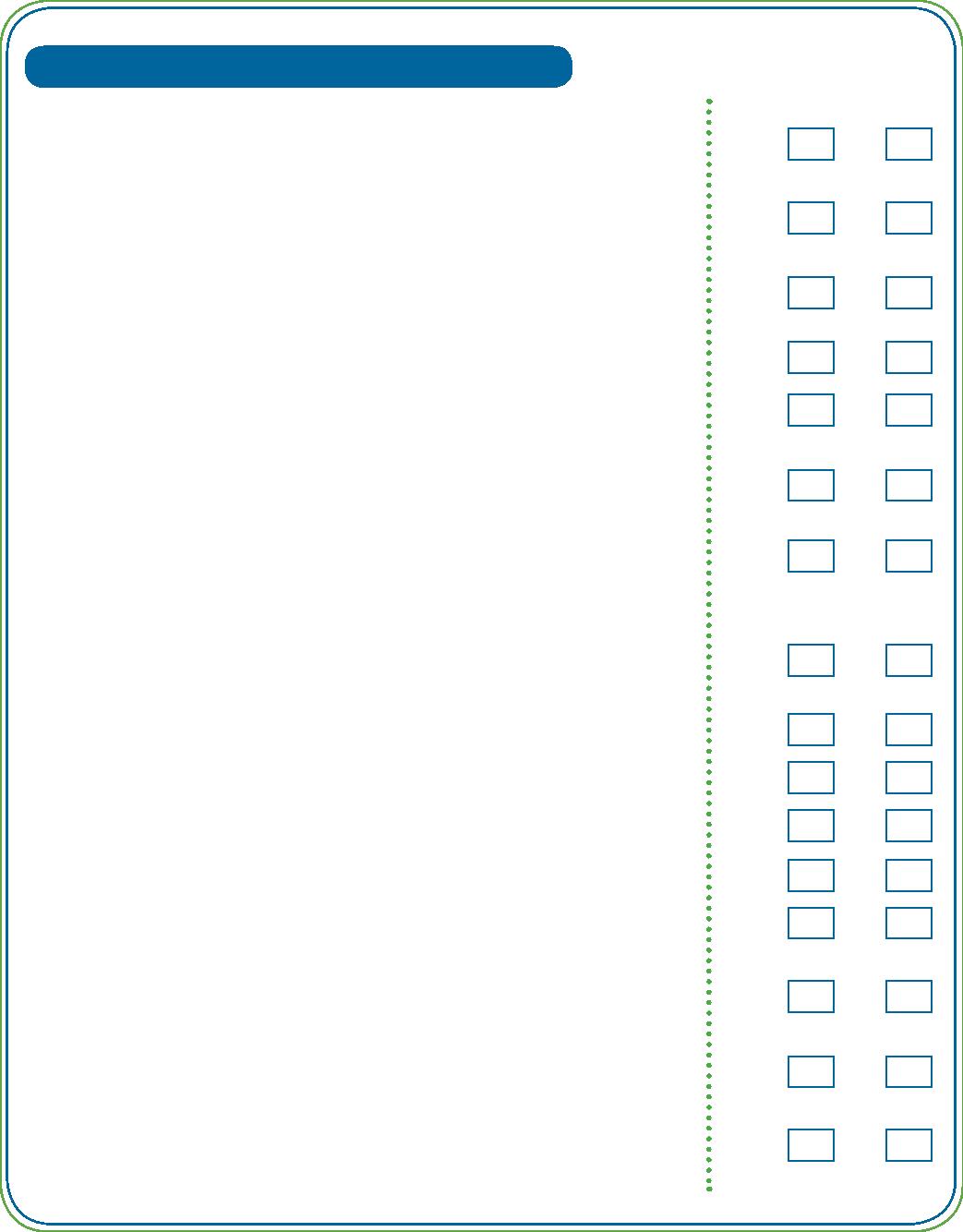
No

2.24 Are contrasting colours used to identify obstacles or

hazards?

2.25 Is there sufﬁcient lighting in all rooms?

3



AUDIT THE SERVICE

2. Physical Accessibility Inside Th 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?

Yes

Yes

Yes

No

No

No

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?

Yes

Yes

No

No

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?

Yes

Yes

No

No

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.

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.

v

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.

4



AUDIT THE SERVICE

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?

Yes

Yes

Yes

No

No

No

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?

Yes

Yes

No

No

1.5 Are you publicising the accessibility of your service?

Consider providing this information in presentations,

publications or brochures in a range of locations.

2. Accessibility of Electronic Information

2.1 Does your informative material include pictures of women

with various impairments?

Yes

Yes

No

No

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.

Yes

No

2.4 Does your website provide audio recordings of information?

Yes

Yes

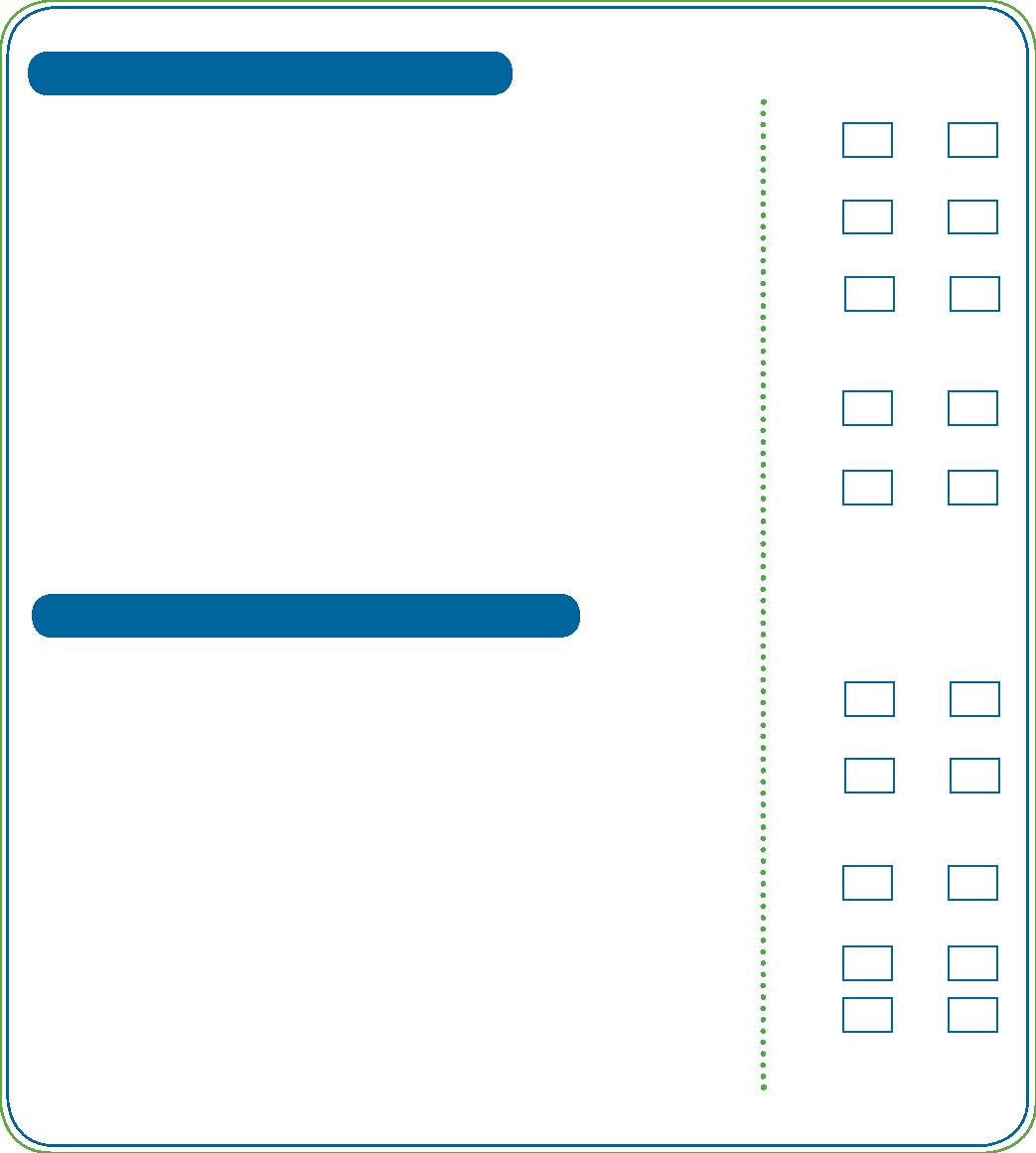
No

No

2.5 Does your crisis or telephone line have a TTY and people

trained to use this technology?

5



AUDIT THE SERVICE

3. Accessibility of Information at the Service

3.1 Are service entry forms available in alternate formats?

Yes

Yes

No

No

3.2 Is assistance available for those who require help ﬁlling out

the necessary forms?

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

Yes

No

No

3.4 Is the induction able to be broken down into smaller

segments to accommodate women with learning or

intellectual disability?

3.5 Do you have assistive communication devices available for

women with disability to use while in your service?

Yes

Yes

No

No

3.6 Do you have TTY and other assisted listening devices at

your service?

3.7 Do televisions have closed-captioning text and staff capable

of using this function?

Yes

Yes

No

No

3.8 Do your staff know how to access interpreters?

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.

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.

6



AUDIT THE SERVICE

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?

Yes

No

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.

Yes

Yes

Yes

No

No

No

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?

Yes

Yes

Yes

No

No

No

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?

Yes

Yes

No

No

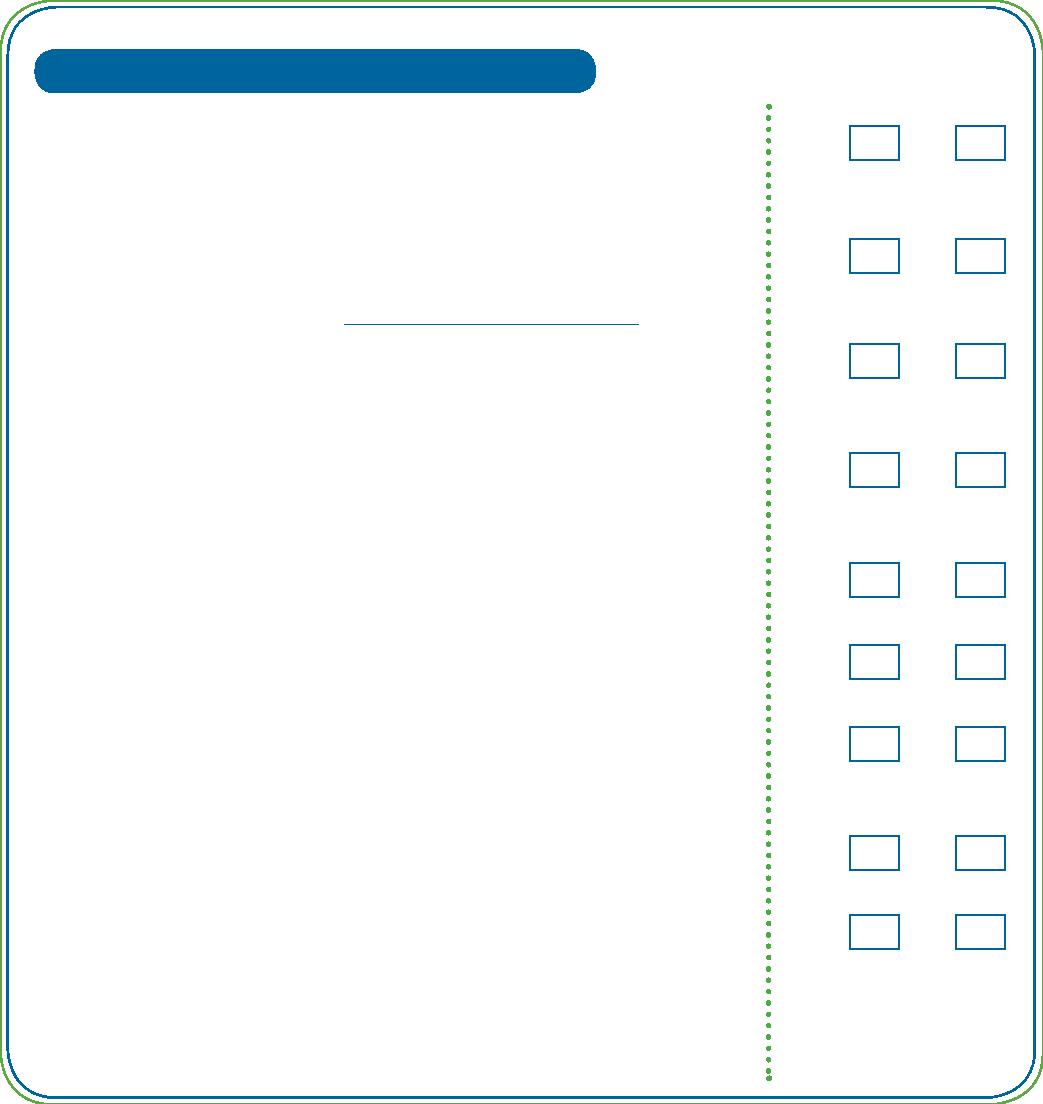
1.8 Do staff members respond to disclosure of violence with

disbelief, or doubt that it occurred?

1.9 Do staff members take the voices and opinions of women

with disability seriously?

7



AUDIT THE SERVICE

1. Attitudinal Accessibility of the Service

1.10 Are staff members required to participate in disability

awareness training?

Yes

No

1.11 Are all staff members and volunteers trained to work with

women with disability?

Yes

Yes

No

No

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?

Yes

No

1.14 Are staff members engaged in making your service more

accessible?

Yes

Yes

No

No

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?

Yes

Yes

Yes

No

No

No

1.17 Are staff trained to use assistive technology and disability

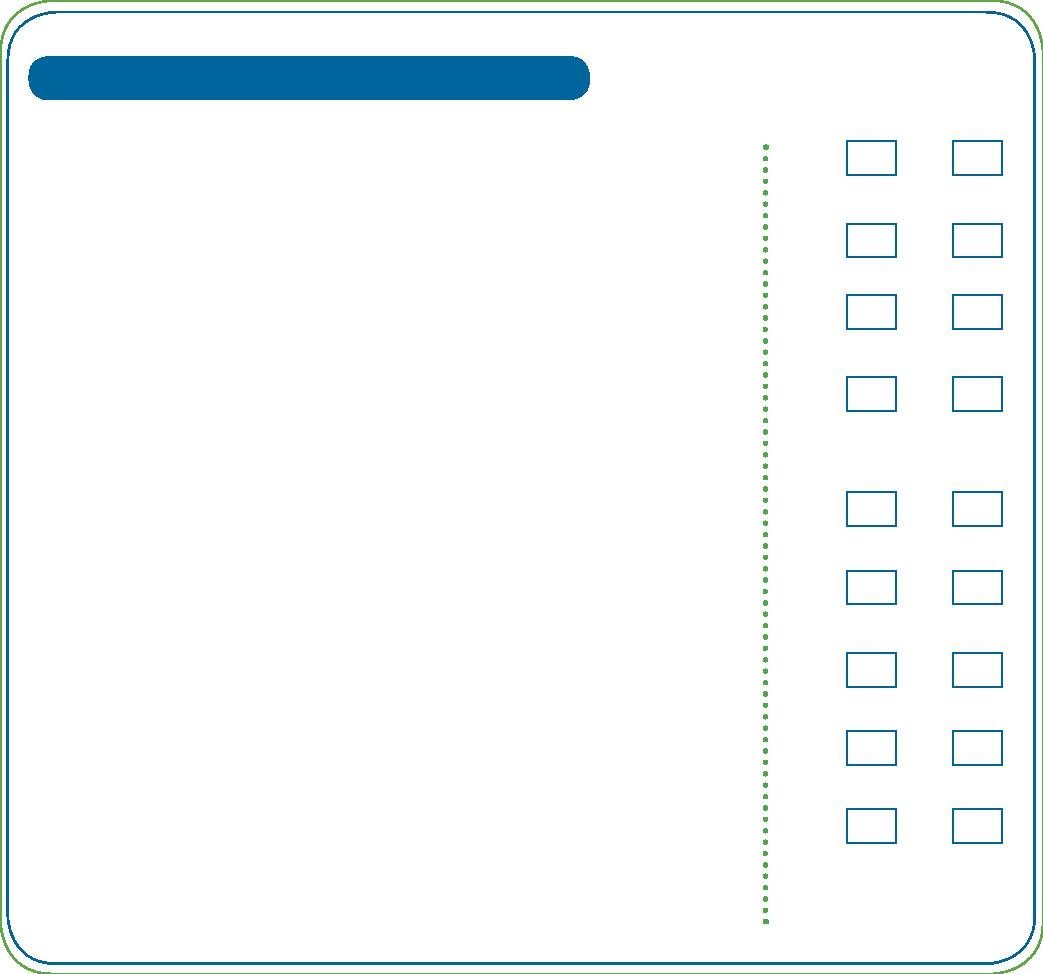
equipment?

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?

8



AUDIT THE SERVICE

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

Yes

No

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?

1.3 Do policies allow carers to accompany women with disability

into your service?

Yes

Yes

Yes

Yes

Yes

No

No

No

No

No

1.4 Do policies allow service dogs to accompany women with

disability into your service?

1.5 Do policies outline the protocol for accessing interpreters or

assistive communication devices?

1.6 Do policies and practices ensure that women with disability

are as independent as they desire within your service?

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?

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

Yes

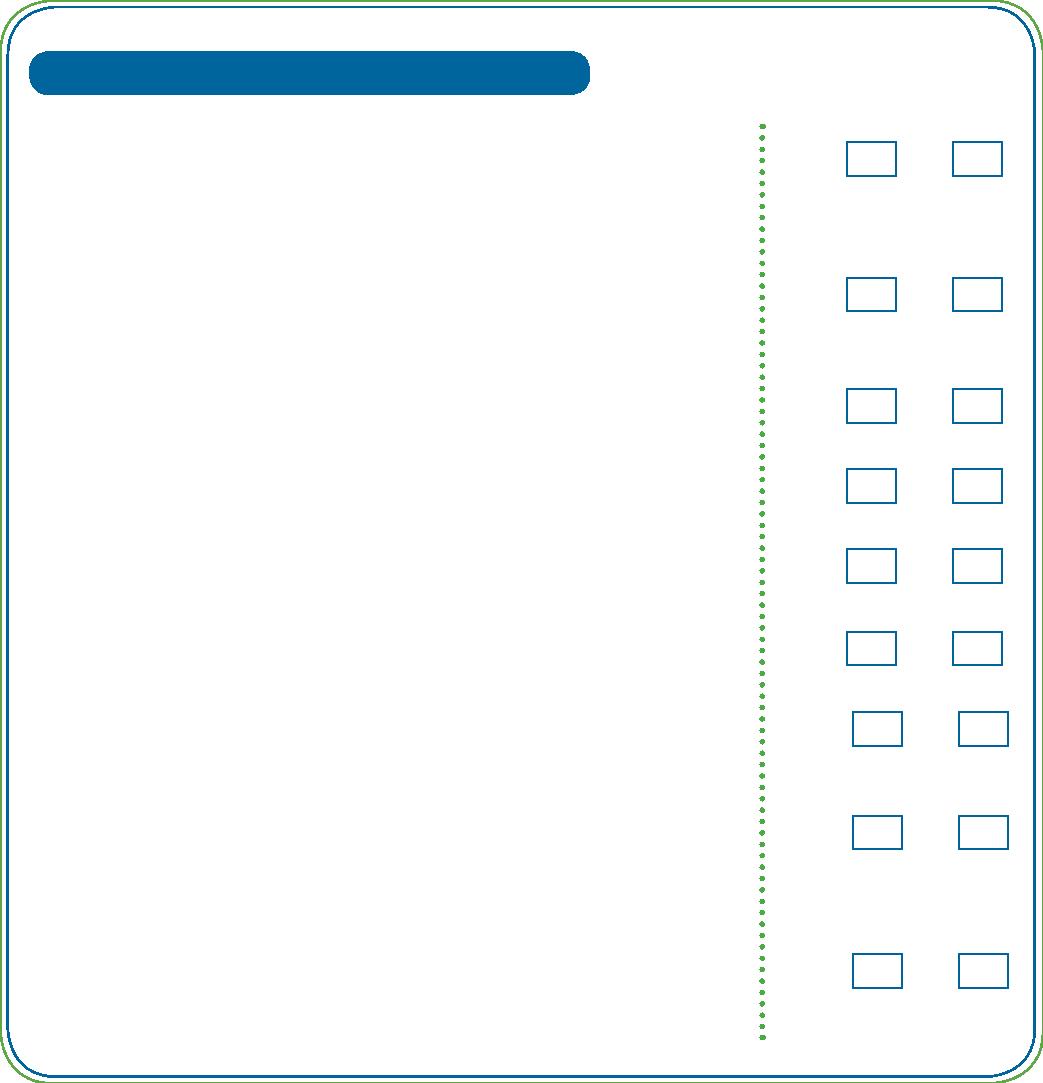
No

No

1.9 Are there procedures or policies in place that outline your

service’s minimum requirements for accessible information?

9



AUDIT THE SERVICE

1. Procedural Accessibility of the Service

1.10 Do programs discriminate against women with disability in

terms of setting unrealistic timeframes or goals?

Yes

Yes

No

No

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

Yes

No

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?

Yes

Yes

No

No

1.14 Can recruitment policies and practices be changed to

move towards equal employment and inclusivity?

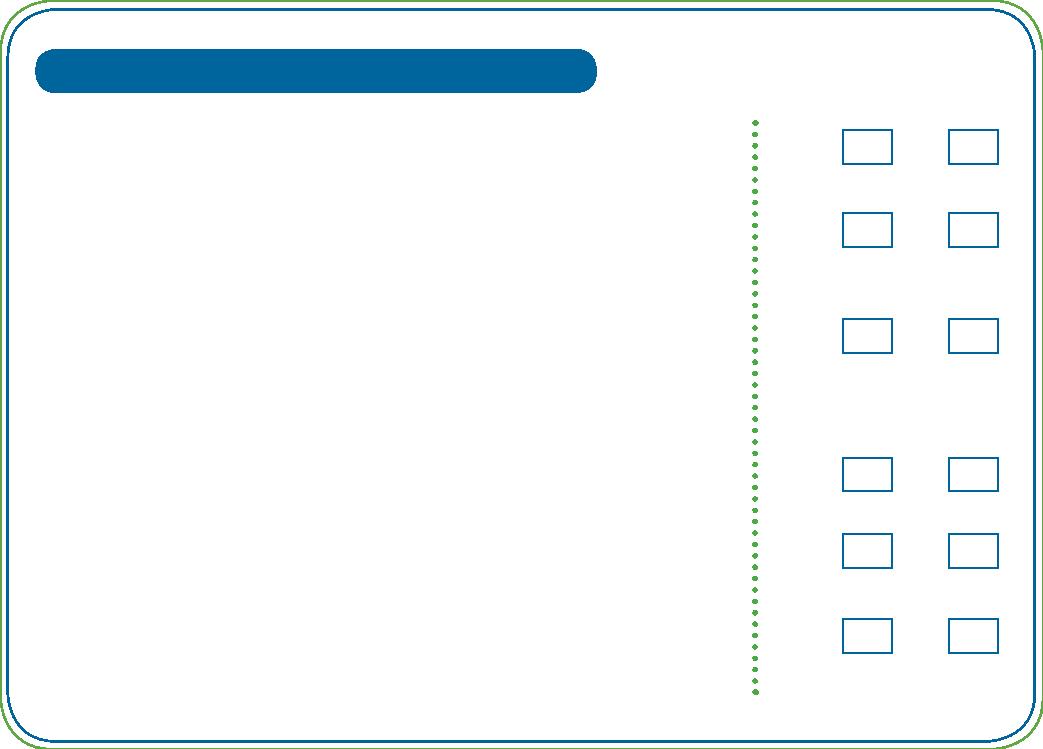
1.15 Could your service employ a disability-speciﬁc case

manager to assist women with disability?

Yes

No

10



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. <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%2FW

DVCS%2520Disability%2520Action%2520Plan%25202013-2016.docx&ei=MmhZVP-

FBIKdmwWCp4GICA&usg=AFQjCNETtLbF-v82WffYExvlyGSKIRe7mg&sig2=-

ogoYunfP8O9xUI2MWilOA&bvm=bv.78677474,d.dGY>

ii WCHM, DVCS, WWDACT and WESNET, 2009. ‘Women with Disabilities Accessing Crisis Services’. <http://www.

pwd.org.au/documents/pubs/SBWWD.pdf>

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>

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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>

11

