DRAFT INCLUSIVE COMMUNICATION GUIDELINES
FOR EMERGENCY MANAGERS

FEEDBACK FROM PEOPLE WITH DISABILITIES (WA) INC.

The 'Inclusive Communication Guidelines for Emergency Managers' will be referred to within this document as 'The Draft' or 'The Guidelines'.

Thank you for the opportunity to comment on the draft 'Inclusive Communication Guidelines for Emergency Managers'. This document presents the feedback from People with Disabilities (WA) Inc., and includes a number of recommendations relating to the formatting and wording of The Guidelines.

People with Disabilities (WA) Inc. is a Peak Disability Organisation providing individual and systemic advocacy, and information services, across Western Australia.

1. STRUCTURE & FORMATTING

- The Draft contains a lot of information and, as a draft, we are aware that its structure has not been finalised.
- Presenting the information as a 'training pack', or 'manager's tool box' with separate guidelines, checklists and tip sheets may help structure The Guidelines.
- The first part of The Draft refers to different policies that provide a rationale for the inclusive communications procedures. As there are quite a few policies mentioned in The Draft, it may be worthwhile referring the reader directly to the official publications, instructing the intended audience to read the required/relevant sections of the publications listed. The relevant sections could still be included in The Guidelines but as separate documents that can be easily accessed when required. See Table 1 below for an example checklist:

Table 1: Policies Checklist

	Policies	Section	Completed
1	United Nations Convention on the Rights of Persons with Disabilities http://www.un.org/disabilities/convention/conventionfull.shtml	Article 21	Yes / No
2	National Disability Strategy http://www.fahcsia.gov.au/sa/disability/progserv/govtint/Pages/nds.aspx#1	-	Yes / No
3	National Disaster Resilience Framework http://www.em.gov.au/Publications/Program%20publications/Pages/NationalDisasterResilienceFramework.aspx	-	Yes / No
4	National Principles for Disaster Recovery http://www.fahcsia.gov.au/sa/communities/pubs/Pages/Recovery.aspx	-	Yes / No

2. ALTERNATIVE FORMATS

When publishing The Guidelines, Matrix and any related materials it is important to provide a good range of alternative formats. Alternative formats to Hardcopy of Portable Document Format (PDF) include:

- Audio (e.g., MP3 / WAV).
- Auslan (Australian Sign Language) video.
- Braille / Tactile Signage.
- Easy English - Example: Productivity Commission Disability Care and Support, Draft Report http://www.pc.gov.au/projects/inquiry/disability-support/draft;
- Electronic File (e.g., Rich Text Format or Microsoft Word Format). Note that some screen readers and text-to-speech software cannot read information in PDF.
- HTML with:
    - a 'listen to this page' option – Example Website: WA Disability Services Commission http://www.disability.wa.gov.au/index.html;
    - a 'change background colour' option – Example Website: Dyslexia Adults Link http://www.dyslexia-adults.com;
    - a 'change font size' option – Example Website: People with Disabilities Western Australia http://www.pwdwa.org.

3. ALTERNATIVE TEXT FOR ELECTRONIC DOCUMENTS

- I used a text-to-speech application named TextHelp Read&Write Gold to read The Draft and found that the application could not read the contents page as it hyperlinked from the words 'Executive Summary' to the main part of the document. In addition, the application was also unable to read the symbols – alternative text is recommended.
- Alternative Text for pictures and symbols conveys the same message in words and can be read using a screen reader or text-to-speech application.
- You can use Microsoft Office's 'Accessibility Checker' for identifying the areas of a document (or spreadsheet) that requires alternative text. Further information can be found at http://office.microsoft.com/en-us/word-help/accessibility-checker-HA010369192.aspx.

4. PURPOSE

- The Purpose of The Guidelines, on Page 6 of The Draft, begins with a list of publications, with only some of these publications described later in the document. Is this list best placed in the Purpose section? Does including this list help clarify the aims and objectives of The Guidelines?

5. TERMINOLOGY & CONSISTENCY

- It is important terms used are positively worded and empower the individuals who are the focus of The Guidelines. Cited on page 18 of The Draft, under the heading is the following paragraph:

Disability should not be thought of as a condition that affects the "special" or "unfortunate few." Disability is a common characteristic and occurrence within the human experience.

- It is, therefore, surprising that throughout The Draft, people with disabilities have been referred to as "special"; "displaced persons with special needs", "person requiring special instructions", and "special needs members of the community".
- Negative terms such as "vulnerable" and "at risk" should be used with caution. Is it really necessary to include these terms, considering that The Guidelines are aimed to address inclusive communication for people with disabilities?
- The terms 'people with disabilities' or 'person with disability' may be more appropriate that using the term 'disabled person'.
- Consistency in the terms used throughout The Guidelines is important. "People with vision impairments" are referred to within The Draft as, 'the visually impaired', 'person with a visual impairment' and 'person with vision impairment'.
- Visiting websites such as Vision Australia (http://www.visionaustralia.org.au/) provides a good reference when trying to decide appropriate terminology to include in a document.

6. DEFINITIONS AND CONCEPTS

- Definitions for terms used throughout a document are best placed at the beginning of a document rather than in the Appendices.
- The definition of "disability", as cited in the Disability Discrimination Act 1992 (see http://www.austlii.edu.au/au/legis/cth/consol_act/dda1992264/s4.html#disability), could be included near the beginning of The Guidelines. The definition of disability cited on Page 33 of The Draft (see below) refers to cause and rationale for addressing the needs of people with disabilities but does not really define disability.

"Disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinder their full and effective participation in society on an equal basis with others. Therefore, if society met all the needs and provided for people's impairments, they would be less disabled but still have the same impairment. For example, people with mental illness or deafness, live with impairment yet may not consider themselves disabled if they are fully catered for in their communities. However in an emergency, they may become disabled by the emergency if inclusive emergency management practices are not implemented."

- "Universal Design" is a key concept and it is good that it has been included in The Guidelines. Other key concepts may include "Reasonable Adjustments" and "Unjustifiable Hardship". The other concepts listed on page 'Communication', "Accessible Information", and "Accessible Events" seem to be more objectives or guideline headings than concepts, where communication and accessible Information are interrelated.
- The definition of 'vulnerable' cited in The Draft on Page 33 could be viewed as offensive to the people listed (see below). It is difficult to predict which people listed would need assistance in an emergency and some of the groups identified may be quite skilled in an emergency. As mentioned above, is it really necessary to refer to the 'vulnerable' in a document about Inclusive Communication?

Emergency Management Australia defines vulnerable as "Categories of displaced persons with special needs, variously defined to include: unaccompanied minors, the elderly, the mentally and physically disabled, victims of physical abuse or violence and pregnant, lactating or single women".

7. THE MATRIX

Below are several suggestions aimed to improve the readability of the Matrix:
- The symbols could be presented separately from the Matrix.
- Separate pages could be used for the two sections, "Inclusive Broadcasting Communication" and "Inclusive Interactive Communication".
- The use of shading could be removed as this makes the reader think that the different shades have some kind of meaning.
- Vertical text can be difficult to read.
- At tick box system could be used for the checklist as the shapes may confuse some people.
- If colour coding is necessary then a key for the colours should be included.
- The Matrix structure and wording could be simplified with clear headings used.
- "Speech-to-Text" and "Text-to-Speech" are very different applications.
- As the Matrix relates to Inclusive Communication Guidelines, in an ideal world each item listed in the column on left should be available across all scenarios. For example, where necessary large print and text-to-speech should also be available during community meetings.
- Does there need to be a column labelled "Impairment"
- Abbreviations should be written in full somewhere within the document.
- The Matrix should be provided in Alternative Formats. Electronic versions of the Matrix should be checked using an Accessibility Checker with Alternative Text provided where necessary.

8. FURTHER COMMENTS

- Words in 'italics' or 'serif' font (with feet) may be difficult for some people to read.
- Clear referencing is necessary for factual information.
- Policies should include the date the policy came into effect, if available.
- The use of 'him/her', 'he/she' is best avoided.
- There was some repetition in The draft. Consider whether all the information cited needs to be in The Guidelines.
- The order of sections presented in The Guidelines is important when considering how the document empowers people with disabilities.
- A reference could be made to "The Premises Standards" in The Guidelines. See http://www.hreoc.gov.au/disability_rights/buildings/access_to_premises.html.

Please contact Amber at People with Disabilities (WA) Inc., if you have any questions regarding the feedback provided in this document.

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