SUBMISSION FOR THE REVIEW OF THE ROTTNEST ISLAND AUTHORITY'S DISABILITY ACCESS & INCLUSION PLAN 2007 - 2012

PEOPLE WITH DISABILITIES (WA) INC.

People with Disabilities (WA) Inc. would like to thank you for your letter dated 23 December 2011, inviting us to provide feedback for the review of the Rottnest Island Authority's Disability Access and Inclusion Plan 2007 - 2012.

People with Disabilities (WA) Inc. (PWdWA) is a peak disability organisation providing individual and systemic advocacy, and information services, across Western Australia. PWdWA is also involved in the development and monitoring of the 'You're Welcome Access WA' website.

METHODOLOGY

To assist us with this submission we collated and reviewed information from the following sources:

- Rottnest Island Authority's Disability Access and Inclusion Plan 2007 - 2012.
- Disability Access and Inclusion Plan Outcomes cited in the Rottnest Island Authority's Annual Reports from 2007 to 2011.
- Access information available from the Rottnest Island Authority's website at http://www.rottnestisland.com/about/getting-around-rottnest-island/disabled-access-information.
- Access information available on the 'You're Welcome Access WA' website at http://www.accesswa.com.au/.
- PWdWA's advocacy database, with information on access issues experienced by people with disabilities in Western Australia.

RECOMMENDATIONS

1. Disability Standards

RECOMMENDATION 1

We recommend that the Disability Access and Inclusion Plan includes a reference to the 'United Nations Convention on the Rights of Persons with Disabilities' and the 'National Disability Strategy 2010-2020'.

The 2007-12 Disability Access and Inclusion Plan refers to several key policies, including the:

- Disability Services Act 1993 (Western Australia amended 2004);
- Commonwealth Disability Discrimination Act 1992; and
- Equal Opportunity Act 1984 (Western Australia, amended 1988).

In July 2008, Australia ratified the 'United Nations Convention on the Rights of Persons with Disabilities' (and its 'Optional Protocol' in August 2009), with the purpose "to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity".

For further information visit: http://www.un.org/esa/socdev/enable/rights/convtexte.htm

In accordance with the Convention, in 2011 governments endorsed 'Australia's National Disability Strategy 2010-2020'.

The Strategy covers six policy areas (outcomes):

1. Inclusive and accessible communities;

2. Rights protection, justice and legislation;

3. Economic security;

4. Personal and community support;

5. Learning and skills; and

6. Health and wellbeing.

The Strategy outlines the role of Australian governments, non-government organisations, businesses and the wider community in creating "An inclusive Australian society that enables people with disability to fulfil their potential as equal citizens… [where] Businesses and community groups play a vital role in creating an inclusive, flexible and accessible environment for people with disability who work or volunteer for them, purchase their goods, access their services or participate in their events." (p. 22-24).

For further information visit:

http://www.fahcsia.gov.au/sa/disability/progserv/govtint/nds_2010_2020/

2. Going beyond physical access requirements

> **RECOMMENDATION 2**
>
> We recommend that the Disability Access and Inclusion Plan includes strategies that take into account a range of access issues that may be experienced by people with disabilities.

Rottnest Island Authority has demonstrated a strong commitment to promoting access and inclusion for people with disabilities, particularly in the following areas:

- participation in the 'You're Welcome Access WA' initiative;
- participation in the 'Companion Card' program;
- availability of a range of equipment / facilities (e.g., accessible accommodation, gophers, tricycles and a beach wheelchair); and
- availability of a range of access-based information uploaded to the Rottnest Island Authority website.

We are also pleased to inform the Rottnest Island Authority that between 2007 and 2012 we have received no calls from clients experiencing access issues at Rottnest Island. However, we did notice that the majority of accessible facilities at Rottnest Island featured on the 'You're Welcome Access WA' website related to access for people with a physical disability. We would like to know what strategies will be included in the Disability Access

and Inclusion Plan to improve facilities and information for people with different forms of disability (e.g., sensory or intellectual disability).

3. Going beyond the holiday experience

The 2007-2012 Disability Access and Inclusion Plan refers to visitors to the Island and access to their 'holiday experience'. We are aware that people who visit or travel to the Island may also include students, educators, volunteers and employees.

3.1. Students and educators with disabilities

RECOMMENDATION 3.1

We recommend that the Disability Access and Inclusion Plan includes strategies to improve access to Rottnest Island's education services, resources and programmes; and that information on access to these services, resources and programmes is included on the Rottnest Island Authority and You're Welcome Access WA websites, and in alternative formats.

We commend the Rottnest Island Authority for the availability of a "diverse range of education services, resources and programmes, suitable for primary and secondary school students, community groups and members of the public." We particularly like the availability of the online resource 'Your Living Classroom – A Teacher's Guide to Planning an Excursion.'

However, we were concerned that some of the resources and programmes would not be suitable for some people with disabilities. For example, the online resource 'Your Living Classroom' was published on the Rottnest Island Authority's website in a PDF format that may be difficult for some people to access using a screen-reader or text-to-speech software. Furthermore, not all the activities listed in the guide (e.g., Adventure Challenge or Freshwater Swamps) would be suitable for all children or adults, depending on their form of disability. We understand that it would be the teacher / trainer's responsibility to select an appropriate activity but information on the suitability of education programmes would be

useful if included in accessibility guides, and on the Rottnest Island Authority and 'You're Welcome Access WA' websites.

3.2. Volunteers with disabilities

Volunteering can be a very positive experience; a way to use and develop skills, meet new people and achieve a sense of worth and belonging. Rottnest Island has a good volunteer program with a range of activities available, including fur seal monitoring, seawall painting, tree planting days and group beach clean-ups. As with the education programmes offered by the Rottnest Island Authority, it is important that people with disabilities can access volunteer activities at Rottnest.

> **RECOMMENDATION 3.2**
>
> We recommend that the Disability Access and Inclusion Plan includes strategies on improving access to Rottnest Island's volunteer activities, with information on the accessibility of activities included on the Rottnest Island Authority and You're Welcome Access WA websites, and in alternative formats.

3.3. Employees with disabilities

> **RECOMMENDATION 3.3**
>
> We recommend that the Disability Access and Inclusion Plan includes an additional outcome:
>
> **Outcome 7**:
> People with disabilities have the same opportunities as other people to participate in employment with the Rottnest Island Authority.

In addition to the 6 desired outcomes, government departments are now recognising the need to include an outcome that respects equal access rights to employment for people with disabilities.

Article 27 of the United Nations Convention on the Rights of Persons with Disabilities, states that countries recognise the rights of people with disabilities "to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities."

The Australian Human Rights Commission lists the employer's responsibilities under the Disability Discrimination Act 1992 as:

- not to discriminate directly by less favourable treatment;
- not to discriminate indirectly by treatment which is less favourable in its impact;
- to make reasonable adjustments where required; and
- to avoid and prevent harassment.

These obligations, regarding people with a disability and also associates of people with a disability, apply in relation to:

- arrangements for determining who should be offered employment, including advertising, provision of job information, application forms, interview arrangements, selection tests, examinations and other inquiries;
- determining who should be offered employment;
- the terms or conditions on which employment is offered;
- the terms or conditions of employment that the employer affords an employee, including matters such as wages, salary or other payments; duties performed; performance requirements; conduct and attendance requirements; occupational health and safety protection; equipment and facilities provided; information and communication on work-related issues; work environment; supervisory and management arrangements; leave entitlements; superannuation entitlements; and workers compensation arrangements;
- opportunities for promotion, transfer or training, including training provided outside the workplace on behalf of an employer;
- any other benefits associated with employment;
- dismissal of an employee, or other termination of employment; and
- any other detriment.

The obligation not to harass a person with a disability also applies in any other circumstances in relation to employment.

For further information visit

http://www.un.org/esa/socdev/enable/rights/convtexte.htm

http://www.hreoc.gov.au/disability_rights/faq/employment/employment_faq_1.html

4. Annual Reports

<div style="border:1px solid #000;padding:1em;">

RECOMMENDATION 4

We recommend that annual reporting of disability access and inclusion plan outcomes includes a list of upgrades and new accessible services, facilities and programmes.

</div>

We noticed that the Annual Reports from 2007-2011 were fairly brief, with the reports often just referring to the continuation of work to improve disability access and inclusion. We also noticed that the 'You're Welcome Access WA' website included a wide range of facilities and services that have been put in place and suggest that the Annual Reports include a list of upgrades and new accessible services, facilities and programmes. Staff training is also mentioned in the Annual Reports, although it is unclear what type of training the staff have received.

We also noticed that the terminology used in the most recent Annual Report (2010-11) referred to people with disabilities as "people with special needs" (p. 78). Some people may find the term 'special needs' offensive. The preferred terms used in our organisation are 'people with disabilities' or 'person with disability'.

Please also find attached to this submission proposed 'Publishing Guidelines' People with Disabilities (WA) Inc. produced for a meeting with the Community Access and Information Branch Manager and 'You're Welcome Access WA' Website Coordinator at the WA Disability Services Commission.

If you require further information or clarification of any points addressed in this submission, please contact Amber at People with Disabilities (WA) Inc.

Dr Amber Arazi

Consultant: People with Disabilities WA Inc.

Oasis Lotteries House

1/37 Hampden Road

Nedlands WA 6009

Ph: (08) 9485 8900 / Fax: (08) 9386 1011

Email: amber@pwdwa.org

Website: www.pwdwa.org

Disability Access and Inclusion Plans (DAIPS)
PUBLISHING GUIDELINES: RAISING PUBLIC AWARENESS

Please read this document in conjunction with the Disability Services Commission's Disability Access and Inclusion Plan Training Package http://www.disability.wa.gov.au/aud/daip/daipresources.html

RECOMMENDATIONS

1: MARKETING THE DAIP

It is recommended that reviewed DAIPS are marketed to the public as soon after endorsement as possible. Marketing may include uploading the DAIP to the Public Authority's website, distributing hardcopies of the DAIP, placing an advertisement in a local or statewide newspaper announcing the publication of the new DAIP, distributing electronic copies of the DAIP via community email networks, and including a link to the DAIP on the 'You're Welcome Access WA' website http://www.accesswa.com.au/.

2: ALTERNATIVE FORMATS

It has been found that many DAIPS are being published on websites in PDF (Portable Document Format), however this is not the most accessible format for people wishing to adapt the format of the document to make it easier to read (e.g., change background colour or font size). Some screen-readers or text-to-speech scanning programs may also find it difficult to read the text from a PDF.

The recommended format for electronic documents is **'Rich Text Format'** or **'Word Document'**.

DOCUMENT FORMATS INCLUDE:

1. Hardcopy Print.
2. Braille.
3. Plain English.
4. Easy English.
5. Australian Sign Language (ASLAN) Video.
6. Audio (e.g., MP3).
7. Info-graphic / Mind Map.
8. RTF (Rich Text Format) or Word Document.
9. HTML (HyperText Markup Language).
10. DAISY (Digital Accessible Information System).
11. PDF (Portable Document Format).

PWdWA Rottnest DAIP Review: AA / Jan 2012

The following web pages show examples of alternative formats:

- PDF, DAISY, Word document, Plain English and Easy English formats.

  http://www.pc.gov.au/projects/inquiry/disability-support/report

- HTML, ASLAN and MP3.

  http://www.ddaedustandards.info/

When producing an electronic document that may be read using a screen-reader or text-to-speech scanning program, it is important to check its accessibility and include alternative text for logos, pictures, charts and other visual information. It is also important to check that the reading order using the software will be the same as the visual order. The accessibility of word documents can be assessed using Office 2010's 'Accessibility Checker' tool http://office2010.microsoft.com/en-us/starter-help/accessibility-checker-HA010369192.aspx.

4: DAIP REPORTS

The Disability Services Commission's DAIP Reporting guidelines state that "Public Authorities are to inform the community about DAIP activities through their Annual Report".

It is recommended that the Annual DAIP Report is also published as a separate document from the Public Authority's Annual Report. The Annual DAIP Report should then be made available alongside the DAIP, and marketed using the same methods as outlined in Recommendation 1.

NOTE: If the DAIP becomes out-of-date during its review process, then people wishing to access either a hardcopy, or an electronic copy of the DAIP via the Public Authority's website, should be -

- made aware that the out-of-date DAIP is still current;
- given access to the DAIP review timeline, including the expected completion date for the new DAIP; and
- referred to the most recent Annual DAIP Report.

RAISING PUBLIC AWARENESS CHECKLIST

The DAIP / Annual DAIP Report has been endorsed by Management and -

1. printed in full in a hardcopy format and placed in a publically accessible location (e.g., public library);

2. produced in an electronic format and checked using 'accessibility checker' tools and published in Rich Text Format or Word Document format;

3. electronically uploaded to the Public Authority's website in a location that can be easily accessed from the website's homepage;

4. summarised in Plain English, Easy English and/or Info-graphic, printed in hardcopy format and placed in a publically accessible location (e.g., public library) and uploaded in an electronic format to the website;

5. published on the website in other formats, as desired by Management;

6. marketed through an advertisement in the local or statewide newspaper, including details on how to access the document (i.e., contact details and website address);

7. marketed through a weblink on the 'You're Welcome Access WA' website http://www.accesswa.com.au/;

8. marketed in full and summary formats and distributed via community email networks; and

9. marketed through relevant events held by, or supported by, the Public Authority.

NOTE: To improve accessibility, information on how to request the DAIP or Annual DAIP Report in an alternative format, or language, should be cited on the first page of the document and also cited separately from the document, directly on the web page in HTML.