

# Feedback on Wellbeing SA draft Disability Access and Inclusion Plan (DAIP)

---

October 2020



251 Morphett Street, Adelaide, SA 5000  
GPO BOX 1146, Adelaide SA 5001  
08 8226 3355 | [commissionercyp@sa.gov.au](mailto:commissionercyp@sa.gov.au)

## Background and summary of recommendations

Thank you for the opportunity to provide feedback on Wellbeing SA's draft Disability Access and Inclusion Plan (DAIP).

As South Australia's Commissioner for Children and Young People, it is my mandate under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* is to advocate at a systemic level for the rights, interests and wellbeing of all children and young people in South Australia, particularly those whose voices are not usually heard.

Although the draft DAIP outlines some promising goals, I am concerned that it does not mention children. This is despite the requirement under the *Disability Inclusion Act (SA) 2018* (the Act) for DAIPs to address priority groups living with disability, including children.

Considering Wellbeing SA's focus on "the early years", prevention and health promotion across the life course, it seems logical that its DAIP should mention children with disability as a group that require specific consideration and action.

Since 2017, I have spoken with thousands of children and young people across South Australia. One of their biggest concerns is about both their own mental health as well as the mental health of others. Children and young people talk often about the impact and the barriers to getting what they described as the 'right help'. They describe friends who are suicidal, parents who are suffering from depression and struggles of stigma, a lack of understanding, embarrassment and isolation.

The most prevalent issue young people have raised is their role in supporting their mates who have significant mental health issues whilst often dealing with their own issues. These informal support networks can often be overstretched while young people talk about real barriers in getting adult help. Young people tell me that in their situations they are most likely to turn to their parents for help rather than schools or professionals. Young people discussed only receiving mental health support when things reach a "critical level."

By including children and young people in its final DAIP, Wellbeing SA can play a leading role in promoting community engagement and participation and supporting the mental health and wellbeing of all South Australians, particularly children and young people with disability.

To successfully do so requires applying a child-centred and disability-aware lens to its work as well as recognising that children and young people are not a homogenous group. Children and young people with disability should not be defined by their disability but by their diverse identities as children and young people and individuals with unique personalities, intellectual and physical abilities, and levels of social, communication and behavioural need.

My office makes the following recommendations to guide the final DAIP's implementation and ensure that Wellbeing SA meets its obligations under the Act:

- 1. That the final DAIP outlines how children and young people with disability will be supported to actively participate in Wellbeing SA's community engagement and consultations that are not confined to "youth-specific" or "disability-**

specific” issues.

2. That the proposed disability awareness training for Wellbeing SA staff addresses the needs of children and young people with disability through trauma-informed and child-centred approaches.
3. That the final DAIP includes actions to improve any existing or develop new child-friendly feedback and complaints mechanisms that are accessible to children and young people with disability.
4. That children and young people are recognised as a priority group in the proposed data indicators and “inclusive definitions” to ensure that Wellbeing SA has a “comprehensive understanding of SA community demographics”.

If you would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



**Helen Connolly**  
Commissioner for Children and Young People

## Submission

- 1. That the final DAIP outlines how children and young people with disability will be supported to actively participate in Wellbeing SA's community engagement processes that are not confined to "youth-specific" or "disability-specific" issues.**

Although the draft DAIP mentions that young people with disability will be included in Wellbeing SA's contribution to the Youth Action Plan, this is the only reference to the participation of young people.

Wellbeing SA's leadership role in prevention and population health, data collection and mental health and wellbeing affects the lives of children and young people. The final DAIP should therefore outline how children and young people with disability will be supported to actively contribute to other parts of the agency's work that are not necessarily youth-specific or disability-specific but nevertheless impact children and young people, including:

- Mental health promotion and the development and design of other health promotion activities (Action 8); and
- The design of the proposed project or mentoring for volunteers or students with disability (Action 16).

In our office's view, the earlier that children and young people are involved, the better embedded they are in the process. Their input should also inform the development of training for Wellbeing SA staff (See Recommendation 2).

The diverse and unique views, lives and experiences of children and young people often differ from adult assumptions. They want to be listened to, not just as individuals with disability but as children and young people.

Children and young people with disability should not only be asked about any issues and barriers they face but they should also be given the opportunity to articulate which issues are most important to them and included in the development of strategies and solutions to address these issues. To do this may require greater collaboration with other agencies in the SA Health portfolio as well as external youth-focused organisations with disability expertise.

- 2. That the proposed disability awareness training for Wellbeing SA staff addresses the needs of children and young people with disability through trauma-informed and child-centred approaches.**

Adequate training helps staff to understand disability, identify disability-related need and offset misconceptions and stigma about disability.

This office welcomes Wellbeing SA's proposed implementation of a disability awareness training module by the end of January 2021. This office recommends that this training:

- Address how children and young people have diverse needs that often differ from adults and therefore require different responses;

- Focus on children’s rights and trauma-informed practice;
- Be developed and delivered by or in collaboration with the disability sector and other agencies with disability expertise (See Recommendation 6); and
- Improve attitudes and responses of staff across all services.

**3. That the final DAIP includes actions to improve any existing or develop new child-friendly feedback and complaints mechanisms that are accessible to children and young people with disability.**

Children and young people have consistently told me that they want organisations to be transparent by ensuring that young people who voice their concerns or opinions are informed about the outcome of their feedback or complaint. They want staff to be kind, respectful, and open-minded and they want to know that the organisation has the capacity to deal with issues properly, completely and with discretion.

*“Feedback must be there for everyone – there needs to be actions done afterwards. The company, business or community must be ready to take on the feedback and must be someone to implement change. Responses to feedback must be fast, efficient, reliable and must cater to the needs of whoever needs assistance.”*

Opportunities to provide feedback and make complaints should be well promoted and offered in a range of formats to accommodate for varying levels of literacy, communication needs and physical and intellectual disability.

If, for whatever reason, Wellbeing SA is unable to respond appropriately to a complaint, staff should be equipped to refer the child or their family to an appropriate service who can help. Once a complaint has been lodged or feedback received, it should be taken seriously, acted upon and used to continuously improve the agency’s work and policies.

Please refer to my [Trust is a Must](#) Report, which outlines what children and young people have told me makes an organisation child friendly and child safe.

**4. That children and young people are recognised as a priority group in the proposed data indicators and “inclusive definitions” to ensure that Wellbeing SA meets its goal of “comprehensive understanding of SA community demographics”.**

Children and young people understand that adults and governments have the responsibility to protect the rights of children and young people, including those with disability. At the same time, they do not always feel confident that they can trust adults to listen to them and value their contributions.

*“They [Adults] don’t take younger people as seriously as they take adults. Our thoughts and ideas are not respected.”*

Wellbeing SA's goal to develop a "comprehensive understanding of community demographics" depends on the inclusion of children and young people in the DAIP's proposed data indicators and "inclusive definitions".

A child-centred approach will only strengthen Wellbeing SA's capacity to truly prioritise the needs of priority populations as well as to perform a "system leadership in prevention, data collection and use" that will inform appropriate funding and the implementation of best evidence-based models in community-wide action in health promotion and prevention at the primary, secondary and tertiary level.