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Access and Inclusion Directorate
Department of Human Services

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Re Accessible and Inclusive Toolkits

Thank you for the opportunity to provide feedback on the draft Accessible and Inclusive Toolkits.

As South Australia's Commissioner for Children and Young People, my mandate is to promote and advocate for the rights, interests and wellbeing of all children and young people in South Australia, particularly those whose voices are not usually heard.

Over the last four years, I have engaged with children and young people living with a disability across a range of educational and community settings and from diverse socio-economic and cultural backgrounds. I have gathered their views on broad issues and in the context of specific projects through conversations and surveys with individuals and groups, both online and face-to-face.

In 2020 and 2021, I have consulted and engaged with young people living with diverse disabilities in specialised settings. Through these consultations and interactions, I have a privileged insight into effective engagement with children and young people with disability. I therefore consider myself qualified to comment on the Engagement and Consultation Toolkit, with a particular focus on the needs of children and young people.

The systemic safety and wellbeing of children and young people with disability depends on them being listened to, involved in decision making, and having their experiences and their views respected. The State Disability Inclusion Plan recognises that children and young people with disability face unique barriers to participation in decision making.

There is real potential for these Toolkits to address these barriers, and the Department of Human Services (DHS) and Inclusive SA are well-placed to do so through providing leadership and guidance to South Australian government agencies and local councils.

However, I am concerned that the current draft Engagement and Consultation Toolkit does not provide the practical and specific guidance necessary to be able to achieve its stated goals, especially in relation to children and young people.

While the Toolkit covers general engagement methods and decision-making tools, there is an insufficient disability lens – let alone age lens – applied throughout this Toolkit to set it apart from existing resources such as the Better Together resource.

There is scope for the final Toolkit to make clearer links between general engagement practices and specific considerations for engaging people with disability of all ages, but particularly children and young people with disability. While the draft Toolkit notes that engaging people with disability can take time and require additional resources, the final Toolkit would benefit if there was practical guidance regarding how to use this time and resources most effectively.

The following reflections on my engagement with children and young people with disability may be useful to consider to ensure the final Toolkit is useful, practical and

meets the needs of children and young people. Ultimately, successful engagement with people with disability is not always about doing engagement 'differently' but rather doing engagement safely, with authenticity, flexibility and an understanding of unique and diverse needs of the people involved. When disability-specific and age-specific considerations are considered well, the engagement experiences and outcomes are likely to benefit everyone, regardless of ability.

I am well aware of the challenges in developing such a Toolkit, particularly given there is limited work in the direct engagement of children and young people with disability. Community engagement initiatives tend to capture the voices of adults (either adults with disability or parents and carers of children with disability) or older young people (aged 18 to 30) as representative of the views of children and young people.

I would also like to draw your attention to two recent publications that could be useful.

- Department for Infrastructure and Transport's draft *Public Transport Diversity and Inclusion Plan*, and *Student and Young Person Action Plan*.[1]
  - o While still a draft, the Student and Young Person Action Plan embeds specific considerations related to age throughout the document, making clear why these considerations are needed, what actions are planned and how they might be achieved.
- JFA Purple Orange's *Guide on Co-Design with People Living with Disability*.[2]
  - o This defines co-design in a similar way to the draft Toolkit, but provides practical tips on how to connect with the disability community, plan engagements to meet access requirements and uphold the rights of people with disability, and sets out key principles, including respect, authenticity and safety beyond physical safety.

While this letter primarily responds to the Engagement and Consultation Toolkit, I hope these insights will also be useful in informing the final versions of the other Toolkits. I would be happy to discuss any of this in further detail at a time convenient to you. If you have any questions, please do not hesitate to contact my office.

Yours sincerely,

Helen Connolly
Commissioner for Children and Young People

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[1] Please see email attachment.
[2] Available at https://purpleorange.org.au/what-we-do/library-our-work/guide-co-design-people-living-disability.

The social model of disability

The draft Toolkits currently describe the 'consequences' or 'impacts of living with disability', including 'economic, political, psychological factors'. This framing of disability appears to be contrary to the social model of disability.

The final Toolkit should be informed by the social model of disability, recognising that people are disabled by barriers within society, such as the attitudes of others or the physical environment, and that disability is not a deficit of the individual, but rather a deficit of the society in which they live.

Safety

Children and young people describe safety as more than physical safety – it's about feeling valued, known, accepted and understood, and having your sensory, emotional, behavioural and physical needs met.

Those facilitating engagement must be mindful of these individual needs related to:

- Types of disability, including physical, intellectual and psychosocial, and all levels of capacity. For example, how to account for the sensory needs of children and young people with autism and intellectual disability, as well as physical accessibility for people with physical disability.
- Age, both chronological and developmental; and
- How to work with families, carers and other organisations or service providers to arrange scheduling, risk assessments and adjustments or adaptations, where necessary.

Often these considerations are remarkably simple; what children describe as making them feel safe and included are as basic as being treated "like a human". Yet their experiences do not always reflect this, with many describing how small they feel when adults talk to them "like a dog" or in a condescending way "that makes you feel beneath them". They describe the most helpful adults as those who are kind, fun, trustworthy, understanding, listen and respect them as an individual person.

Methods of engagement

Traditional methods of engagement such as large group forums or surveys designed for a general audience may not necessarily be as effective when consulting or engaging with children and young people with disability.

Smaller groups are often preferable to enable the highest level of participation and engagement and the best possible support that meets individual needs.

Recognise and minimise barriers

The final Toolkit should recognise that the barriers facing children and young people with disability can be attitudinal as well as practical, ranging from:

- Ableism, which perpetuates low expectations or assumptions about the capacity of people with disability to communicate and participate; to
- "Adultism", which ignores or discounts children's perspectives; to
- Logistical barriers, which may intersect with poverty and include issues with the cost and accessibility of transport and participation. This is particularly important if the Toolkit intends to have a focus on people with disability in regional areas of South Australia.

It is important to consider that some children and young people with disability rely on support from adults who understand their communication needs in order to effectively participate and communicate. It is essential that such support guides and facilitates, rather than speaks on behalf of the child or young person.

Identity

Children and young people with disability view their place in the world very differently to adults. Like all young people, young people living with disability seek to be identified by, and valued for, their age, their relationships, and their achievements.

Identity develops over time, and many young people may not want to be defined by their disability and may choose not to disclose their disability. As such, opportunities for engagement should:

- Be available on a wide range of issues and experiences beyond 'disability-specific' or 'age-specific' issues.
- Acknowledge that how a young person self-identifies may impact how they engage.

Authenticity

Authentic engagement and consultation with people with disability should:

- Have a clear rationale and purpose, which is communicated from the outset;
- Be realistic about what you are doing with any information gathered;
- Ensure all information is relevant, meaningful, accessible and developmentally appropriate;
- Where possible, share information or key messages gathered through the engagement or consultation back to participants in a way that is meaningful and easy to understand.

Flexibility

In order to keep children and young people engaged and comfortable, it is important for those leading the consultation or engagement to:

- Provide young people with opportunities to participate in different ways that are appropriate for them, whether this is through activities like drawing, colouring or plasticine, or with support from communication devices, interpreters, or with some other means.
- Be willing and equipped to adapt to different disability-related needs or other needs related to the environment, size of the group and age.
- Use language that it is child friendly and think about the most appropriate way to frame questions.
- Keeping questions broad and open-ended is likely to be more effective than technical, specific or closed questions.

Other considerations:

- Consider the potential need for and benefits of partnering or collaborating with external agencies or organisations, such as youth organisations with disability expertise.
- Respect children and young people with disability's time. In addition to school, young people with disability attend regular appointments, undertake capacity building activities and often access additional tutoring or mentoring.