Disability Inclusion Action Plan

2021-2025

NSW Department of Education



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# Secretary’s foreword

I am pleased to present the Department of Education’s Disability Inclusion Action Plan (DIAP) for 2021–2025.

The Plan is our commitment to build on the actions that we have already taken to make Education an inclusive organisation for our students, staff and our community.

The department’s vision is for a highly skilled, vibrant, and inclusive NSW where all students are achieving their potential and contributing as informed citizens to our society, where all staff are valued for their skills and contributions

This Plan creates a five-year roadmap to ensure our schools and workplaces are accessible and that our culture enables participation and growth for all.

It has been developed in genuine consultation with stakeholders to understand and recognise existing barriers as well as devise projects across the agency to remove those barriers. The projects provide solutions that are essential to people with a disability and useful for everyone.

I believe that each of us – no matter our level, position, or function – has an active part to play in building a stronger more inclusive culture. And while we still have a way to go, together we will get there. To ensure that we do, divisions are required to regularly report on the progress of their projects to our Diversity and Inclusion Council and we will share our progress with you.

I will champion this DIAP, and our department will actively implement it.

**Georgina Harrisson**

*A/Secretary*

*NSW Department of Education*

# Why a Disability Inclusion Action Plan?

The Disability Inclusion Act 2014 (the Act) commits the NSW Government to “creating a more inclusive community in which mainstream services and community facilities are accessible to people with disability to help them achieve their full potential.”

As required under the Act, the NSW Government developed a Disability Inclusion Plan (NSW DIP) in 2015. It sets out how to create a more inclusive society across the state and requires all NSW public agencies such as Department of Education to create, implement and evaluate disability inclusion action plans (DIAPs). The NSW DIP established four focus areas for each agency’s DIAP. These were developed in consultation with people with disability and provide a guide for all public sector agencies in NSW.

## DIAP Focus areas

### Developing positive community attitudes and behaviours

* How we (public sector agencies) behave towards colleagues with disability.
* How we treat clients and community members with disability.
* How we can have a positive influence in the community in general – improving how people with disability are perceived and included.

### Creating liveable communities

* How we work to ensure the physical environment and services operating in our communities are accessible.
* How we respond to the needs people with physical and sensory disabilities, to ensure these individuals have full access to their community and activities.

### Supporting access to meaningful employment

* As part of the Premier’s Priorities, we want to employ more people with disability across our sector.
* How we ensure staff with disability feel included and have equal access to career development opportunities.

### Improving access to mainstream services through better systems and processes

* This covers a range of technical accessibility matters including forms, the internet and accessing information and services.
* Ensuring everybody has access to the right information, so staff, the community and public sector agencies can all communicate clearly and effectively with each other.

# The case for inclusion

## What does ‘inclusion’ mean?

Inclusion is about affording dignity and respect through our actions. To be inclusive, is to take steps so that a person can meaningfully contribute in their workplace, community and society and have a sense of belonging. Our actions are inclusive when they afford everyone not just some, the dignity and respect of:

* **Independent access**: designed so that it doesn’t assume that assistance is required.
* **Equitable access**: designed so that it doesn’t take longer or make anyone go further.
* **Participation and growth**: designed so that everyone’s authentic involvement is a natural and expected thing. This is particularly important for people for whom disability is a lived experience.
* **Satisfaction**: designed to create a place or experience where people feel at ease, safe, engaged, and connected.

Our decisions either remove or raise barriers that shape the ability of others to access, participate in, and contribute to our work and communities on the same basis. To include and enable everyone from the outset, our mindsets and methods require empathy to understand people’s needs, the flexibility of thought to challenge our own assumptions, and the willingness to discover new ideas and practices that afford our audience dignity.

## Disability is part of our lives

Our understanding of disability directly influences our thinking and actions about developing an inclusive culture to include and enable persons with disability from the start of our interactions with them.

Both the Act and the United Nations Convention on the Rights of Persons with Disabilities (CRPD) highlights that, “disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others”[[1]](#footnote-1). In other words, **Disabilities = impairments + barriers**.

‘People with disabilities’ are ordinary people living with impairments who can be included and enabled to be fully participating and equal members of the community through removing the barriers. What ‘disables’ a person with an impairment is not their impairment, rather the barriers in society. Barriers are not limited to physical and/or environmental ones. There can be attitudinal, technological, policy and/or systemic barriers.

### Disability is diverse and dynamic

* It may be permanent or temporary.
* It may have existed from birth or may have been acquired due to an injury or illness or as part of the ageing process.
* It is often invisible, sometimes episodic, while for others, it may be stable.
* Its impact upon any one individual may be mild, through to significant and severe.
* It increases with age, from an average of 1 in 5 in the Australians population, to 1 in 3 by the age of 55 and finally 1 in 1 by the age of 85.
* Disability is caused by a range of conditions. This includes intellectual, physical, cognitive, sensory, and neurological impairments or mental illness.

What people with disabilities have in common is the disadvantage and discrimination that they can experience as a result.

### A quick snapshot of our audience

In NSW there are over 1.3 million people living with disability[[2]](#footnote-2).

* 25% of the population have perceptual problems
* 36% of adults have less than functional literacy skills
* Nearly 50% of our population wear glasses or contact lenses
* 54% of people report having at least one long-term eye health condition.
* 1 in 5 students in NSW Public schools (172,000 students) have a disability[[3]](#footnote-3).
* 85% of those students (146,000) learn in **mainstream classes**
* 12% of those students (21,000) learn in support classes in mainstream schools
* 3% of those students (5,700) learn in **schools for specific purposes** (SSPs).
* 135, 000 students required adjustments that are in addition to the strategies & resources available to all students

## Our inclusive response

Every stakeholder wins when designing for individuals is standard practice. As shown in Figure 1, while some people have a permanent disability, others can have temporary or situational disabilities. Inclusively designed products and services that have end users in mind, can reach and benefit up to four times the size of the intended audience.[[4]](#footnote-4) By designing to include someone with a permanent disability, someone with a temporary impairment or situational limitation can also benefit. Inclusive solutions benefit everyone, for they are essential for some and useful for all.

Impairment as a persona spectrum, of permanent, temporary and situational impairments, sorted by touch, Hear, See and Speak.


*Figure 1: Persona Spectrum - Microsoft Inclusive Design Toolkit © Microsoft 2016 Licensed under Creative Commons Attribution- NonCommercial-NoDerivatives (CC BY-NC-ND)*

We believe that each of us – no matter our level, position or function – has an active part to play in building an inclusive culture. It begins with recognising that that diversity is the norm not the exception. As individuals, teams and divisions we can all:

* **Recognise that exclusion exists** in our systems, processes, and attitudes.
* **Learn from diversity** – Consult, listen and learn from stakeholders about their experiences.
* **Solve for one, extend to many**. Co-design with stakeholders from concept through to completion to ensure solutions are “essential for some and useful for all.”

# Education’s Disability Inclusion Action Plan

Our Disability Inclusion Action Plan (DIAP) builds on our previous DIAP and includes our Disability Strategy and Access and Inclusion Index report. It also supports the implementation of a wide range of Department policies including the Inclusive Education policy and the Workplace Diversity policy. This plan articulates a consistent, achievable approach to improving outcomes for people with a disability. Not as a separate and bespoke strategy, rather as an important central part of our everyday business.

## Our intent

Although DIAPs currently have a four-year life, they must become integrated into organisational culture and practice. To achieve this, we commit to embedding the principles of inclusive design in our thinking and actions. We will listen to, learn from and codesign with our stakeholders to:

* be constantly aware of, proactive and responsive to disability matters.
* take deliberate steps to identify challenge areas and take planned and resourced actions to address them. These steps will come in the form of projects.

## Our approach

Projects are at the cornerstone of intent and action. Projects are developed and owned by each Group/Division. This allows staff across the agency to take accountability for their part in ensuring their core business becomes barrier free. It also provides individual divisions the agility to be proactive and responsive to disability matters as they arise.

Each project owner must engage with key stakeholders in a meaningful way through the life of the project – from design to evaluation to ensure that it to address stakeholders needs effectively.

## Our areas of focus are

All projects are grouped under one of four focus areas. The focus areas represent important key stakeholders and touchpoints. Students are and always will be our core focus. Our community members and staff who support our students are key focus areas as well. Just as ensuring our physical and digital environments are designed to be barrier free so that we can all participate on the same basis. Our areas of focus express our aims and intent. They also contribute to achieving the outcomes within the NSW Disability Inclusion Plan.

### Focus area 1: Our students and community with a disability

**Students will:**

* Feel welcomed into their local school community
* Experience more responsiveness to changes in their needs
* Have more involvement in decisions about their education
* Experience smoother transitions between schools and settings
* Receive a clearer demonstration of learning outcomes from teachers

**Families will:**

* Be treated as partners and recognised as experts of their child
* Receive earlier identification and support for their children
* Find it easier to connect with other families with similar needs
* Have better and easier experiences with our system (including complaints)
* Be provided with more consistent information from schools, NDIS providers and health services

### Focus area 2: Our employees with a disability

* Feel welcomed in a workplace culture in which we think and act inclusively
* Experience recruitment processes that are accessible and promote fair selection processes
* Participate in career development opportunities on an equal basis
* Receive appropriate and reasonable workplace adjustments in a timely manner
* Recognise Education as an employer of choice

### Focus area 3: Our physical places and spaces

* Embed universal design to embrace diversity and deliver design solutions that benefit as many people as possible and afford users the dignity of independent and equal access.
* Provide accurate and up to date information about their level of accessibility against the Disability (Access to Premises – Buildings) Standards and National Construction Code
* Endeavour to provide enhanced accessibility for different user groups with integrated design features to improve overall ease of use and comfort.

### Focus 4: Our digital information and services

Any digital product (content, digital book, software hardware or services) created or procured:

* Enables equal access of use for all intended users, be they students, staff or community.
* Complies with level AA of the W3C’s WCAG's current standard
* Works seamlessly with the inbuilt accessibility features/assistive technologies found on current mainstream devices

# Accountability

## How we support DIAP projects

We will ensure projects stay on track by supporting them in a range of ways.

* The Organisational Culture and Capability team will provide information, guidance and advice to each project team.
* Each project will have a registered Executive Sponsor who will provide progress reports at agreed intervals.
* The department’s Diversity and Inclusion Council reviews all project proposals and all subsequent progress reports. The Chair of our Disability Employee Network (DEN) is a member of the Council and there are representatives from core divisions of our department.
* By posting project details and progress reports online, we affirm our commitment to transparency and accountability.
* There is a dedicated mailbox that will ensure any inquiry is addressed promptly [dandi@det.nsw.edu.au](mailto:dandi@det.nsw.edu.au?subject=DIAP%20feedback)

### How you’ll know progress is being made

The DIAP has several ways to ensure accountability:

* All project proposals must detail:
* The project objective – what the project seeks to achieve and what outputs will be delivered.
* The challenge – what change challenge will the project address.
* Why this is important – the benefits envisioned and why they are important.
* What success will look like – what changes a successful project will deliver.
* How success will be measured.
* The department’s Diversity and Inclusion Council has set six-monthly meetings at which it will review progress reports from all active, or completed, DIAP projects. The DIAP working group will also meet at other times as needed.
* All registered projects will be posted online; and will be updated with progress reports at least at six-monthly intervals.
* An annual ‘How are we doing?’ report will be posted online, with our Secretary’s endorsement.
* The consultation strategy will ensure that internal and external stakeholders are invited to review the DIAP’s progress annually.
* All completed projects must be reviewed. We will ask whether the project has succeeded, and what we can learn to inform future work to improve what we do.

## Why our DIAP is web-based

Our DIAP is published as a web page to make it available to everyone in the most accessible format. Having it online also helps to ensure it’s:

* **up-to-date –** so we can keep you informed about projects and successes.
* **accountable –** it will help you see what progress is being made.

# Laws and systems

Our plan is a living example of our core values and our strategic intent. It also includes and models the wide range of legal and policy obligations under which the Department of Education operates. These obligations include:

## International

* [UN Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html)

## Australian

### ***Federal***

* [Disability Discrimination Act 1992 (Commonwealth)](https://www.legislation.gov.au/Details/C2016C00763) and related [Disability Standards for Education (2005)](https://www.legislation.gov.au/Details/F2005L00767) and [Access to Premises – Buildings (2010)](https://www.legislation.gov.au/Details/F2020C00976)
* [Disability Services Act 1986 (Commonwealth)](https://www.legislation.gov.au/Details/C2018C00146)
* [National Disability Insurance Scheme Act 2013 (Commonwealth)](https://www.legislation.gov.au/Details/C2019C00332)
* [National Disability Insurance Scheme](https://www.ndis.gov.au)
* [National Disability Strategy](https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/national-disability-strategy-2010-2020)
* [Australian Standard EN301:549](https://infostore.saiglobal.com/en-au/Standards/AS-EN-301-549-2016-100620_SAIG_AS_AS_211428/)

### ***State***

* [Anti-Discrimination Act 1977 (NSW)](https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1977-048)
* [Disability Inclusion Act 2014 (NSW)](https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2014-041)
* [Government Sector Employee Act 2013 (NSW)](https://www.legislation.nsw.gov.au/view/html/inforce/current/act-2013-040)
* [NSW Disability Inclusion Plan](https://www.facs.nsw.gov.au/inclusion/disability/overview)
* [NSW Public Sector Capability Framework](https://www.psc.nsw.gov.au/workforce-management/capability-framework)
* [Education Act 1990 (NSW)](https://www.legislation.nsw.gov.au/view/whole/html/inforce/current/act-1990-008)
* [Children (Education and Care Services National Law Application) Act 2010](https://www.legislation.nsw.gov.au/view/html/inforce/current/act-2010-104)
* [Work Health and Safety Act 2011 (NSW)](https://www.legislation.nsw.gov.au/#/view/act/2011/10)

# Consultation and engagement

## Why it’s important

Engagement helps us better understand what is important to people with disability, how decisions are made, and what influences those decisions.

Education is committed to ensuring that we consult effectively with people with disability. Our Disability Inclusion Action Plan (DIAP) is designed for ongoing consultation with staff and the community.

We will create pathways so that people with disability, and those who support or care for them, can have their voices heard in the clearest way by the people who can act on their concerns.

## How we’ll do it

**The DIAP has an overall consultation strategy.**

Each DIAP project is required to have consultation built into its project design. By involving people with a disability, we can empower and support them to shape and influence their own lives and the services they access. When we effectively engage from the start, we build relationships and trust, and receive insights that can help drive improvement in people’s lives.

The Department’s Disability Strategy as well as the Access and Inclusion Index Report are used to inform the development of our DIAP projects. Both of these involved extensive community and workforce consultation.

This will ensure that consultations are well managed, and they are appropriately targeted to give meaningful input and review. These will be conducted by:

* building consultation partnerships with disability peak organisations, disability advocacy groups, service providers, employee networks and other stakeholders.
* consultation workshops
* emails to [dandi@det.nsw.edu.au](mailto:dandi@det.nsw.edu.au?subject=DIAP)

Provide feedback

If you have any feedback on current projects or suggestions for new projects email us at: [dandi@det.nsw.edu.au](mailto:dandi@det.nsw.edu.au?subject=DIAP%20feedback)

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# Our Projects

## Accessibility Requirements for Leases and Licences

### Project summary

#### Objective

School Infrastructure NSE (SINSW) Property team undertakes land acquisition for the purpose of developing new school facilities. The due diligence undertaken for any proposed acquisition includes consideration of land topography and its potential impact on the feasibility of a particular site. This work will continue to be formalised and capture din due diligence reports and assessments.

The SINSW Property team also accepts leases and licences to either occupy corporate office space where typically the landlord enters into a formal lease agreement with Property & Development NSW (PDNSW) / Department of Planning, Industry and Environment (DPIE) and also there are circumstances where the Department of Education (DoE) licences school space to external parties for example Before and After School Care services.

Accessibility will continue to be fully considered as a formal part of the process.

#### Benefits

Accessibility requirements will be considered in early stages of land acquisition or the leasing / licencing of property. Embedding these requirements will ensure final build / leasing outcomes fully consider accessibility requirements and contribute to the goal of providing inclusive spaces for our users.

#### What will success look like?

All students, staff, visitors and lessees of SINSW premises are considered as part of leasing and licencing process.

#### How will success be measured?

Improved design outcomes on land acquired by the department, fewer scope changes at later project stages to ensure appropriate access is provided across school sites, accessibility considerations documented as part of leasing or licencing processes.

#### Key project milestones

* Consider land topography and accessibility requirements within Due Diligence framework for Land Acquisitions
* Continue to formalise accessibility requirements when leasing properties, accessibility considerations to be prescribed as part of evaluation and decision- making
* Continue to regularly assess DoE corporate accommodation principals to ensure accessibility considerations are appropriately captured
* Accessibility Guidelines / considerations continue to be incorporated into Business Cases to ensure new schools and school upgrades consider accessibility and inclusive design requirements from the outset

#### Project Governance

* Division: School Infrastructure
* Project executive: Executive Director, Infrastructure Planning
* Project lead: Director, Property

## Accessibility Training for Property and Facilities Staff

### Project summary

#### Objective

Increase the provision of regular and mandatory training and resource provision for all employees responsible for property and facilities design and maintenance to ensure they are aware of current accessibility standards, requirements and best practice.

#### Benefits

All Asset Service Officers (ASOs) and project staff to be familiar and aware of the accessibility standards and requirements.

#### What will success look like?

All ASO and project staff to be familiar and aware of the accessibility standards and requirements.

#### How will success be measured?

All ASO and project staff will have successfully completed the required training

#### Key project milestones

* Introduction of training course Q4 2021
* All ASO and AMU project staff to have completed training by FY2022/23

#### Project Governance

* Division: School Infrastructure
* Project executive: Executive Director, Asset Management
* Project lead: Group Director Asset Management

## Accessible Devices – ComFleet 2.0

### Project summary

#### Objective

The project has three objectives:

* Ensure accessibility of the device, operating system build and productivity tools. This will be achieved through specific engagement with disability advocates within the Department. A representative/s will be sought with the assistance of the Lead, Disability Employment and Inclusion. The role of this representative will be to participate in the selection and testing of new End User Computing Devices and peripherals to improve accessibility. They will also be asked to participate in the various customer technical test groups which test operating system updates and major releases of new software. In this role they will provide feedback and Insight Into the use of these products and services from an accessibility standpoint. Further they may also nominate other staff within the Department where appropriate to participate in these processes to strengthen the process by providing another accessibility lens.
* Appoint an Accessibility Advocate to the ComFleet BAU Forum. The forum meets fortnightly to discuss challenges, issues, and opportunities across the ComFleet eco system. The Accessibility Advocate will attend these forums to represent and educate the group on the accessibility needs of Department Corporate staff. Accessibility will be made a fortnightly agenda item to ensure that focus is maintained.
* Promote technology accessibility through The Hive Tech Bar. Working with partners including Microsoft we will upskill the team who provide productivity sessions on the native productivity tools available in Windows and Office. This team will create a productivity session for staff to attend on how to use the accessibility features of Windows and Office 365. This objective will not only assist staff in making their own use of technology more accessible, but with the use of tools such as the Office Accessibility Checker, staff will be able to make their work and even their emails more accessible for their customers and colleagues

#### Benefits

There will be a range of benefits delivered through the three objectives:

* Improved accessibility of the entire ComFleet ecosystem, which is comprised of the hardware and peripheral devices, Windows Operating system, and Office 365. This will be achieved through the engagement of Accessibility Advocate being involved in the selection and testing of hardware and software. Success will be measured by engagement and written approval of any new hardware or Operating System and Office 365 applications
* Field staff engagement in solving accessibility challenges. Engagement with the Accessibility Advocate in the BAU Forum will provide an ongoing focus for the leadership of ComFleet support teams on Accessibility. Allowing these staff to build their awareness in this area and passing that onto their teams. Success will be measured through participation of the Accessibility Advocate in the ComFleet BAU forum, and dedicated fortnightly discussion of accessibility challenges in the forum
* We will build visibility and skills in providing accessible content across the corporate customer base. This will be done through delivery of productivity sessions on how to use the tools at our disposal to improve our own usage, and to coach customers to create content that is more accessible for others. Success for this goal will be measured through the number of participants attending the productivity session and the feedback they provide on the session. This session will be kept up to date through ongoing specific engagement with Microsoft on their accessibility tools

#### What will success look like?

Success will be visible through the appointment and active engagement of the two roles created, the customer-based advisor role in endorsing new tools and services. The ITD based advocate role through their engagement in the ComFleet BAU Forum.

Engagement with the productivity sessions and customer feedback will allow for service improvement and will demonstrate the success of the initiative.

#### How will success be measured?

1. Success will be measured by engagement and written endorsement from the Accessibility Advisor of any new hardware or Operating System releases.
2. Success will be measured through participation of the Accessibility Advocate in the ComFleet BAU forum, and dedicated fortnightly discussion of accessibility challenges in the forum.
3. Success for this goal will be measured through the number of participants attending the productivity session and the feedback they provide on the session. This session will be kept up to date through ongoing specific engagement with Microsoft on their accessibility tools.

#### Key project milestones

|  |  |  |
| --- | --- | --- |
| Milestone | Due | Notes |
| Appoint first ComFleet accessibility advisor. Customer role. | Term 3 2021 | Will be coordinated with Lead, Disability Employment and Inclusion to ensure a suitable person is selected. We will work with the nominee and Greg to define a Terms of Reference for this role. |
| Appoint first ComFleet BAU Forum accessibility advocate. ITD staff role. | Term 3 2021 | ITD staff member, the initial advocate will be selected in consultation with Lead, Disability Employment and Inclusion. This person will also help define a Terms of Reference for this role. |
| Delivery of the initial Accessibility Productivity session. | Term 4 2021 | This initial session will be created working with the accessibility advocate and our project partner from Microsoft. |

#### Project Governance

* Division: Operations Group
* Project executive: Executive Director, Customer Experience and Service Delivery (CESD)
* Project lead: Director, Service Support

## Accessible Digital Experience Platform

### Project summary

#### Objective

The Digital Experience Design (DxD) team manages the Digital Experience Platform, called Adobe Experience Manager via a product management process. The platform manages 2,200 school websites, the public website and intranet.

Work/development is conducted via continuous release/continuous improvement and is schedule via a backlog. Consistency is maintained via the department's Global Experience Language (GEL), also known as our Design system. Each release requires accessibility testing to ensure we maintain the current WCAG compliance/standards.

#### Backlog of items

Work on accessibility improvements is managed through epics/stories, these include:

* Review of current pattern library and possible alignment to NSW.GOV’s pattern library
* Review possible move to material design as a potential upgrade for the GEL, currently built on Bootstrap.
* Review current [Accessibility Tool](https://education.nsw.gov.au/about-us/gel/accessibility-basics/accessibility-toolkit)
* Identify potential automation for accessible code/upgrades
* Work with Adobe via their Customer Advisory Board (CAB) to improve accessibility of the authoring interface.

#### Benefits

* Ensure DoE’s Pattern Library maintains the WCAG compliance/standards.
* Uplift accessibility of the authoring interface for Adobe sites

#### How will success be measured?

* Maintain AA compliance
* SLAs for accessibility issues:
  + Sev 1 - close out within 6 weeks
* Quarterly reporting of accessibility issues
* Aim for a zero complaints rate for accessibility

#### Key project milestones

* Ongoing: Accessibility Testing Reporting - WCAG compliance/standards
* December 2021: GEL Review – Finding Report
* December 2021: Review current Accessibility Tool
* March 2022: Code automation/process improvement
* December 2022: GEL updates

#### Project Governance

* Division: Operations Group
* Project executive: Executive Director, Customer Experience and Service Delivery (CESD)
* Project lead: Director, Digital Experience Design

## Accessible School Design Standards and Guidelines

### Project summary

#### Objective

This project seeks to elevate the level of accessibility currently achieved by new school designs. Outputs will include:

* Clarification and itemisation of existing accessibility requirements of the Educational Facilities, Standards and Guidelines (EFSG).
* Updated review documentation and processes to ensure existing requirements are being consistently implemented.
* New accessibility EFSG requirements to include key principles and relevant technical information to ensure our infrastructure response reflects the Departments Disability Strategy to ensure all students can access and fully participate in learning.
* New Design Guidance documentation for the design of Support Units within mainstream schools to ensure key design principals and technical design information is communicated to design and project teams providing a considered and consistent approach.

#### Benefits

The new design guidance will communicate School Infrastructure’s position on accessible and inclusive design to project teams, benefiting all users including people with disabilities.

### What will success look like?

The seamless integration of Inclusive Design or accessibility principles within the design process, with all new projects (including upgrades) as a minimum meeting the enhanced accessibility requirement of the EFSG, ensuring access to school facilities is equitable for all users.

#### How will success be measured?

Success will be measured through:

* The ability for project teams to adopt the new accessibility / inclusive EFSG requirements, with departures from these requirements reducing over time.
* As we build new schools and undertake upgrade work, all users experiencing fewer physical barriers within the built environment.

#### Key project milestones

Key project milestones are as follows:

* Clarification of existing EFSG accessibility requirements to be completed by September 2021 with delivery of the new EFSG website.
* Scoping of any additional requirements, including cost/benefit analysis.
* Proposed updates to go through appropriate EFSG consultation and governance
* process.
* Approved updates to be added to EFSG website content and applied to all new work.
* Accessibility standards in-house review documentation and process to be updated.

#### Project Governance

* Division: School Infrastructure NSW
* Project executive: Executive Director, Business Enablement
* Project lead: Manager, Disability Standards

## Barrier free recruitment

### Project summary

#### Objective

That our recruitment processes and systems, enable, encourage and value the attraction of a diverse workforce that reflects the diversity of the communities we serve.

Identify the current barriers to an inclusive recruitment experience and develop an approach to address those barriers including new or revised procedures and capability/training needs.

Establish continuous improvement mechanisms and review annually to ensure processes continue to meet project objectives.

#### Benefits

***‘Our kids can’t be what they can’t see’*.**

A diverse workforce embedded in an inclusive culture supports innovation and high performance.

Having more diverse staff and leaders across the department and in particular our schools will provide the role models to inspire others to see Education as a positive career choice.

#### What will success look like?

* Recruitment practices are accessible and barrier free for all applicants.
* Hiring Managers understand the barriers that some applicants face in the recruitment process and take steps to address them.
* Increase the number of people with a disability applying for roles.
* Increase the number of people with a disability who are successful in obtaining a role.

#### How will success be measured?

* # Number of information and training sessions to support a greater understanding of the principles of inclusive recruitment (school vs corporate)
* # Increase in number of staff with disability
* # Number of times Job Access is engaged
* # Number of applicants that identify with a disability

#### Key project milestones

By May 2022: Develop clear Barrier Free Recruitment processes and procedures

Commence in August 2021 and completed by June 2022: Build awareness and understanding of the value of barrier free recruitment through the delivery of initial Barrier Free Recruitment training to the recruitment teams

#### Project Governance

* Division: People Group
* Project executive: Executive Director, People and Culture
* Project lead: Manager, Corporate Recruitment and Manager, School Recruitment and Placement

## Disability Focused Consultation Groups

### Project summary

#### Objective

Implement a process (the Disability Focus Consultation Group Process – DFSG Process) to formally consult with employees such as the DEN and service users (students and families) with disability about the design and fit out of premises.

#### The Benefits

Users with a disability/disability Subject Matter Experts are best placed to provide feedback relating to their environment / engaging with the school community / staff etc.

#### What will success look like?

The DFCG Process will capture relevant and appropriate information from employees and service users as required. The information being captured will be of sufficient detail to be provided to relevant teams and mitigating action taken in response to the requirements of employees and service users.

#### How will you measure success?

The level of engagement with the DFCG Process will be a key means of measuring success, and can include metrics such as surveys, consultation forums, and number of individual pieces of feedback from employees and service users.

The DFCG Process is intended to capture relevant and useful information that can be fed back into the design process, standards and guidelines. Accordingly, success will also be measured by the number of actions being taken as a direct result of the feedback collected through the DFCG Process, and whether these actions are properly addressing the concerns and needs of employees and service users.

#### Key project milestones

* Determine responsible teams and project leads for implementation of different parts of the project
* Consult with relevant stakeholders within SINSW, DoE and external to determine requirements to incorporate existing processes into the DFCG Process
* Develop detailed project plan and process map encompassing the DFCG Process
* Commence the DFCG Process and data capture across organisation
* Information through the DFCG Process provided to teams responsible for implementing changes to address feedback from stakeholders
* To align to existing or emerging processes

#### Project Governance

* Division: School Infrastructure NSW
* Project executive: Executive Director, Asset Management
* Project lead: Director, Office of the Chief Executive

## Equal access to digital information and services

### Project summary

#### Objective

Any digital product (content, digital book, software hardware or services) procured or created by Department staff is designed to current WCAG and/or AS EN 301:549 standards to provide equal access of use for all their intended users, be they students, staff or community members.

#### Benefits

* Barriers to persons with a disability engaging with department digital products will be removed.
* The Department will achieve its obligations under the United Nations Convention on the Rights of Persons with Disabilities, Disability Discrimination Act(DDA), the Disability Standards for Education (DSE), Marrakesh Treaty and Australian Standard 301 549 (Accessibility requirements suitable for public procurement of ICT products and services) to provide equal access to information and services.
* Teachers will be more capable to meet their professional responsibilities under the Australian Professional Standards for Teachers with reference to standards, 1.5, 1.6, 2.6, 3.4, 4.1 and 7.2.

#### What will success look like?

* Users with or without a disability will be able to seamlessly perceive, operate and understand digital products with or without the use of the inbuilt accessibility features/assistive technologies found on mainstream devices. Minimum compatibility: iOS 14, iPadOS 14, macOS 11 or Windows 10 or above.

#### How will success be measured?

* WCAG accessibility audits of Department web content and services
* Confirmation that functional performance and accessibility requirements are mandatory components of all new ICT procurements.
* People Matter Employee Survey (PMES) results will be used to measure if staff feel their disability is a perceived barrier to success in their role and if staff feel confident in creating and maintaining an inclusive work environment.
* Tell them from Me survey results will be used to measure student and community feedback on their user experience.
* Increase in staff disclosing diversity information in relation to their disability, due to greater awareness and confidence in the support the Department provides

#### Key project milestones

#### Phase 1 – Due: November 2021

* Develop a formal Digital Accessibility Policy that articulates the Department’s requirement that any digital product (content, digital book, software hardware or services) it creates (including staff-created content) or procures must be designed to provide equal access of use for all their intended users, be they students, staff or community. This requirement supports our obligations under the United Nations [Convention on the Rights of Persons with DisabilitiesExternal link](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html), [Disability Discrimination ActExternal link](https://www.legislation.gov.au/Details/C2018C00125)(DDA), the [Disability Standards for EducationExternal link](https://www.legislation.gov.au/Details/F2005L00767) (DSE), [Marrakesh TreatyExternal link](https://www.communications.gov.au/policy/policy-listing/marrakesh-treaty-people-print-disability) and Australian Standard [301 549External link](https://infostore.saiglobal.com/en-au/standards/as-en-301-549-2016-100620_saig_as_as_211428/) (Accessibility requirements suitable for public procurement of ICT products and services).
* Establish a cross division accessibility steering committee to drive and coordinate digital accessibility across the agency and within their divisional responsibility
* Develop a cross division communication plan to promote new policy and resources to build staff awareness and capacity in providing equal access to digital information and services.

#### Phase 2– Due: January 2022

* Implement cross division communication plan
* Identify opportunities to speak/ present at key stakeholder events. Such as PPA and SPC events,

#### Project Governance

* Division: People Group
* Project executive: Executive Director, People and Culture
* Project lead: Lead, Disability and Inclusion

## Hearing Australia/Toukley Public School Project

### Project summary

#### Objective

To better understand what is happening for students who have undiagnosed hearing loss if we are going to improve learning outcomes.

The project seeks to answer the question of whether there are students in NSW primary schools with undiagnosed hearing loss that is likely to reduce their educational outcomes. It will also explore how we might leverage existing programs and resources in schools.

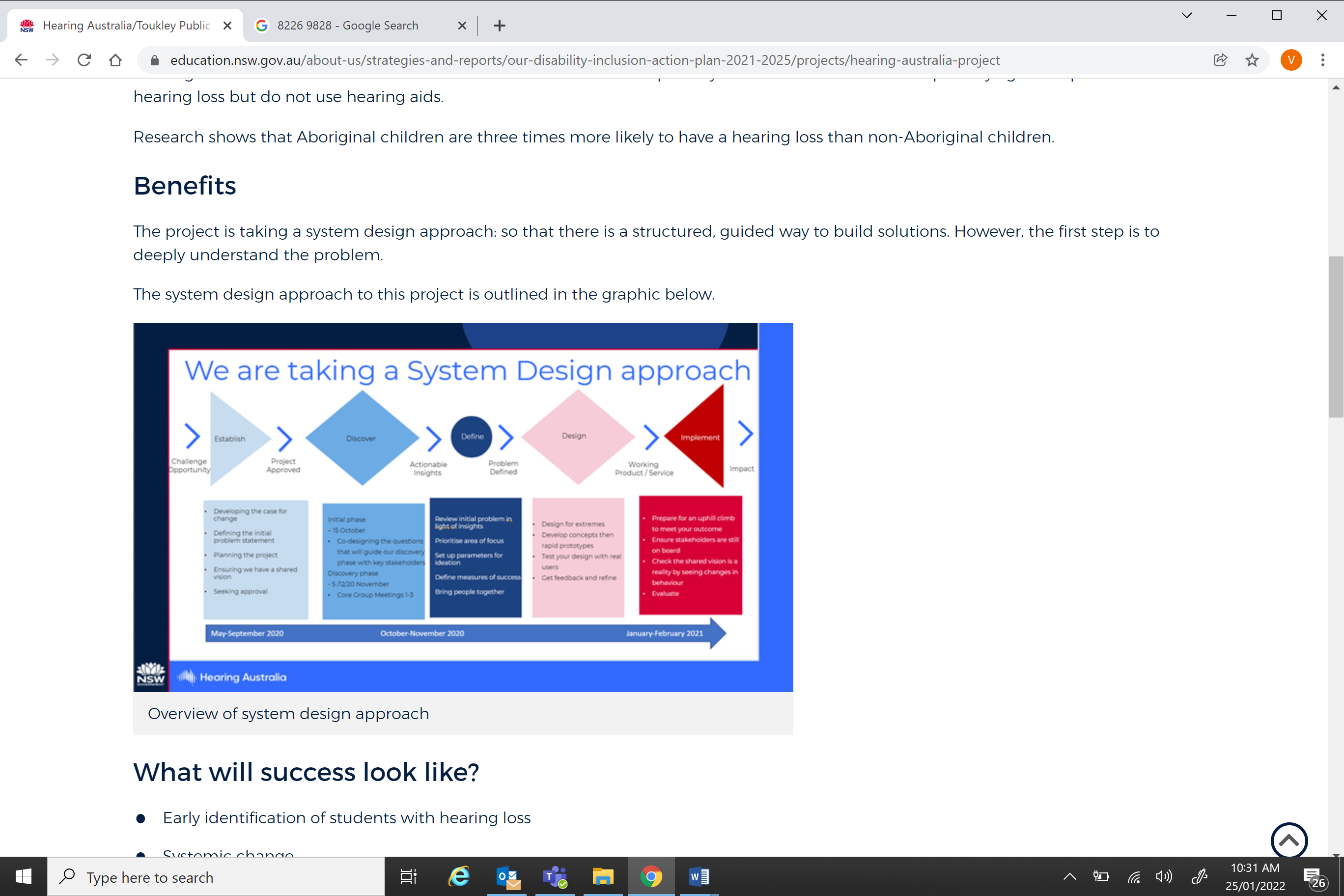
Hearing Australia’s 2019 data showed that 2607 of its clients were in primary school and 200 children of primary age have permanent hearing loss but do not use hearing aids.

Research shows that Aboriginal children are three times more likely to have a hearing loss than non-Aboriginal children.

#### Benefits

The project is taking a system design approach: so that there is a structured, guided way to build solutions. However, the first step is to deeply understand the problem.

The system design approach to this project is outlined in the following image:



Overview of system design approach

#### What will success look like?

* Early identification of students with hearing loss
* Systemic change
* Building capacity
* Building a community of practice

#### How will success be measured?

* Engagement in Professional Learning
* Seeing change in behaviours
* Increased screening of students

#### Key project milestones

* Teacher PL- Modules 1 & 2, 100% of staff completed.
* Screening - K-2:
  + 52 students screened.
  + 4 students with possible ear health and hearing. Audiologists following up with Parent/Carers.

#### Next steps planning:

* Transition the project from Inclusive Education to Aboriginal Outcomes and Partnerships by 1 June 2021.
* Hearing Australia and Inclusive Education will develop a flow chart template for referral pathways for families by 30 June 2021.
* Creation of a MS TEAMS page for Toukley PS staff and the local itinerant hearing team, for collaboration and shared resources by 30 June 2021.
* Further engagement in professional learning at Toukley Public School, delivered by Hearing Australia, on a needs basis.
* Explore opportunities to scale up the project to a neighbouring school.

#### Project Governance

* Division: Education and Skills Reform
* Project executive: Director, Learning School Strategy, Aboriginal Outcomes and Partnerships
* Project lead: Hearing Australia

## High Learning Support Needs (HLSN) funding

### Project summary

#### Objective

The Disability and Inclusion Program provides funding and support to enable children with disability and additional needs in community preschools to participate in a quality early childhood education program on the same basis as their peers. Under the Disability and Inclusion Program, the department provides funding support to community preschools for children with high learning support needs to develop and deliver a child’s individual learning plan (ILP). The aim of the ILP is to support a child’s specific learning requirements to enable them to participate in the educational program on the same basis as their peers.

#### Benefits

Funding and support to enable children with disability and additional needs in community preschools to participate in a quality early childhood education program on the same basis as their peers.

#### What will success look like?

Children with disability and additional needs in community preschools participate in a quality early childhood education program on the same basis as their peers.

#### How will you measure success?

An evaluation of the Disability and Inclusion Program will commence in 2021. This includes evaluating High Learning Supports Needs (HLSN) funding. The evaluation will assess how these components lead to intended outcomes for children.

#### What are the key project milestones?

HLSN applications are submitted by services to the department during 4 main rounds, as well as 4 minor rounds, for each calendar year. Following assessment of applications during each round, services with eligible applications receive funding to support children with disability and additional needs at their service.

#### Project Governance

* Division: Education and Skills Reform
* Directorate: Early Childhood Education and Schools Policy
* Business area: Early Childhood Education Programs
* Project Executive: Director, Early Childhood Education Programs
* Project Lead: Manager, Access and Equity

## Improve accessibility of learning content and materials

### Project summary

#### Objective

Increase awareness and capacity of course authors, presenters, and providers to design and host ‘barrier-free professional learning events that enable employees (with or without disability) to participate on the same basis.

#### Benefits

Learning and development courses that are available and fit for purpose for all employees:

* Improves the employee experience for staff with a disability in particular for career path progression.
* Increases compliance with our legislative obligations to provide equal access to information and services under the United Nations [Convention on the Rights of Persons with DisabilitiesExternal link](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html), [Disability Discrimination ActExternal link](https://www.legislation.gov.au/Details/C2018C00125)(DDA), and Australian Standard [EN 301 549:2020External link](https://infostore.saiglobal.com/en-au/standards/as-en-301-549-2020-100620_saig_as_as_2905383/).
* Decreases organisational risk

#### What will success look like?

* Learning and development courses for all staff department-wide to be compliant with international accessibility standards [WCAG 2.1 AAExternal link](https://www.w3.org/WAI/WCAG21/quickref/) it's successor standards.

#### How will success be measured?

* Quality assurance process to be applied to professional learning.
* Note: High-level discussions are currently underway to establish a group for a quality assurance process to be identified and undertaken for all professional learning for both corporate and schools. This will be initially managed through a Professional Learning Taskforce.
* Short term action measures include:
* Click rates on webpage content relating to inclusive design
* Enquiries from business units on how they can engage and support learners

#### Key project milestones

#### Short term for completion by September 2021

* Add the [creating inclusive professional learning](https://my.education.nsw.gov.au/human-resources/diversity-and-inclusion/inclusive-tools-and-resources) html on Diversity and Inclusion webpage
* Note: This action requires the support of the Organisational Culture and Capability, Culture and Diversity team to review and update content as required.
* **June 2021** – communication strategy to promote inclusive design principles, for example staff noticeboard, Yammer groups, newsletters, digital boards at 105P, staff portal pop-ups, Learning and development community within the department
* **July 2021** - Promote awareness of the[PSC disability awareness eLearningExternal link](https://www.psc.nsw.gov.au/culture-and-inclusion/disability-employment/learn-more-about-disability/disability-awareness-training) via the Corporate Learning Centre news banner and staff noticeboard with a recurring schedule every 6 months
* **July 2021** – include link to webpage for creating inclusive professional learning (guidance for learning authors to make sure any new training is accessible) on corporate learning (learning and development) intranet pages
* **August 2021** – Speak with D and I team regarding reasonable adjustment requirements for staff progressing their careers.

#### Long term

* Investigate the feasibility of the acquisition of a course authoring tool that complies with WCAG 2.1 or above which can be discussed in collaboration with business units such as; CESE (Education and Skills Reform) , ITD (Operations), PLNTS and MyPL (Operations)

#### Project Governance

* Division: People Group
* Project executive: Executive Director, People and Culture
* Project lead: Lead, Learning and Development, Organisational Culture and Capability

## Inclusive Career Learning & Professional Learning

### Project summary

#### Objective

Co-design and deliver accredited professional learning to build the capacity and knowledge of Career and Transition Advisers to improve the career education and transition outcomes of young people with disability.

#### Benefits

* Strengthen the knowledge and understanding of Career and Transition Advisers to enable them to better support the career aspirations of students with disability.
* Planning for students with disability is collaborative and informed.
* Establish professional learning that can be delivered consistently across NSW, and contains links to resources and key contacts.
* Provide professional learning that is Quality Assured (QA) by the Department of Education and contributes to participants accredited hours.
* Professional learning can be delivered virtually to extend the reach across NSW and not disadvantage rural and remote schools.

#### What will success look like?

* Professional learning will be well subscribed.
* Post learning surveys indicate participant confidence and knowledge levels have increased.
* Students with disability are provided relevant information and advice that supports their identified career and transition pathway planning.

#### How will success be measured?

* Pre and post training surveys.
* Data extracted from the annual School to Work report.
* Feedback from Career and Transition Advisers.

#### Key project milestones

* Professional learning sessions are delivered in Term 3 and Term 4 2021.

#### Project Governance

* Division: Education and Skills Reform
* Project executive: Director, Pathways and Transitions
* Project lead: Career Learning Advisor

## Inclusive content and services

### Project summary

#### Objective

Any digital product (content, digital book, software hardware or services) created, curated or procured by department staff is designed current WCAG and/or AS EN 301:549 standards to provide equal access of use for all their intended users, be they students, staff or community members.

#### Project Benefits

* Barriers to persons with a disability engaging with department digital products will be removed.
* The department will achieve its obligations under the United Nations [Convention on the Rights of Persons with DisabilitiesExternal link](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html), [Disability Discrimination ActExternal link](https://www.legislation.gov.au/Details/C2018C00125)(DDA), the [Disability Standards for EducationExternal link](https://www.legislation.gov.au/Details/F2005L00767) (DSE), [Marrakesh TreatyExternal link](https://www.communications.gov.au/policy/policy-listing/marrakesh-treaty-people-print-disability) and Australian Standard [301 549External link](https://infostore.saiglobal.com/en-au/standards/as-en-301-549-2016-100620_saig_as_as_211428/) (Accessibility requirements suitable for public procurement of ICT products and services) to provide equal access to information and services.
* Teachers will be more capable to meet their professional responsibilities under the [Australian Professional Standards for TeachersExternal link](http://www.aitsl.edu.au/australian-professional-standards-for-teachers) with reference to standards, 1.5, 1.6, 2.6, 3.4, 4.1 and 7.2.

#### What will success look like?

* A senior leader within Communication and Engagement will be responsible for driving action and accountability on accessibility within areas of their remit
* Communication and Engagement staff will possess the awareness and capacity to create content and services in line with current WCAG standards. (currently WCAG 2.1).
* Communication and Engagement to be an active member of the Accessibility Leadership Group

#### How will you measure success?

* WCAG accessibility audits of department content and services
* Completion rates of staff undertaking accessibility training
* Analytics of visits/interactions on accessibility central hub.

#### Key project milestones

#### Phase 1– August 2021

* A senior leader within Communication and Engagement identified as responsible for driving action and accountability on accessibility within areas of their remit
* Communication and Engagement to be an active member of the Accessibility Leadership Group

#### Phase 2– December 2022

* Communication and Engagement staff will possess the awareness and capacity to create content and services in line with current WCAG standards. (Currently WCAG 2.1).

#### Project Governance

* Division: Communication and Engagement
* Project executive: Executive Director, Communication & Engagement
* Project lead: Manager, Content Creative and Design, Communication and Engagement

## Inclusive Education for students with disability

### Project summary

#### Objective

Develop a new policy and resources on inclusive education to strengthen inclusive practice in NSW public schools.

#### Benefits

* Improved clarity around roles and responsibilities under the Disability Standards for Education 2005
* Strengthened inclusive practice and pedagogy across NSW public schools

#### What will success look like?

* Students with disability are learning to their fullest capability
* **T**eachers are equipped with access to knowledge and resources that enable them to identify opportunities and implement adjustments and activities with confidence

#### How will success be measured?

* Feedback from parents, students and staff
* Monitoring of complaints and feedback data
* Website traffic data for the Inclusive Practice Hub
* We will explore additional opportunities for measuring the success of these initiatives

#### Key project milestones

* Publication of Inclusive Education Policy for Students with Disability and practice resources: Term 3 2021
* Supported familiarisation activities throughout Term 3 and 4 2021

#### Project Governance

* Division: Learning Improvement
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Disability Strategy

## Inclusive ICT Procurement

### Project summary

#### Objective

New action: Implementation of AS EN 301 549 (Accessibility requirements for the public procurement of ICT products and services) across the Department.

* All relevant Information and Communication Technologies (ICT) procurements administered by the department’s procurement unit above $150,000 including GST will incorporate accessibility requirements in line with Australian Standard [301 549](https://infostore.saiglobal.com/en-au/standards/as-en-301-549-2016-100620_saig_as_as_211428/) .
* All DoE staff are aware of and understand the need to ensure that accessibility requirements are met by contracted suppliers for procurements managed by the procurement team for the procurement of ICT services. Improve the way ICT items are procured to meet accessibility standards and requirements.

#### Benefits

* The ICT services and equipment meet the accessibility requirements under the Australian Standards.
* Procurement staff are able to provide guidance and assistance to business units undertaking the procurement of ICT services to remind them of the requirements to meet accessibility standards when procuring relevant ICT items.

#### What will success look like?

* ICT procurement that meets the accessibility requirements.
* Staff awareness on their responsibility to ensure meeting accessibility requirements when procuring relevant ICT items.

#### How will success be measured?

* PMES surveys identify the appropriate level of ICT services and equipment are fit for purpose and meet the accessibility standards.
* Confirmation from Lead, Disability Employment and Inclusion | People and Culture that enhanced procurement processes adopted by the procurement unit satisfactorily meeting the accessibility requirements needed to be addressed in the procurement of ICT items.

#### Key project milestones

#### Phase 1 – Communication

1. Develop a communication and training plan to meet the awareness objective under this project plan. Responsible Officer: Lead, Disability Employment and Inclusion, People and Culture and R/Procurement Policy Manager.
2. Endorsement of the communication plan developed by Lead, Disability, and Inclusion, A/Director, Strategic Sourcing, Disability Inclusion Council, and Chief Technology Officer
3. Approval from the Chief Procurement Officer

#### Phase 2 - Implementation

1. Implementation of the communication and training plan as per communication and training plan

#### Phase 3 – Review Phase

1. Six monthly review to be undertaken
2. Survey seeking feedback

#### Project Governance

* Division: School Infrastructure NSW
* Project executive: Group Director - Chief Procurement Officer
* Project lead: Senior Procurement Officer, Government Initiatives

## Inclusive Practice in Education (IPiE) Scholarship

### Project summary

#### Objective

Boost the number of teachers qualified and accredited to teach students with disability across all settings.

#### Benefits

* Three IPiE study pathways including:

1. Masters in inclusive/special education
2. Masters with specialisation in the area of deaf and hard of hearing or blind and low vision
3. Graduate Diploma in inclusive/special education

* A strong pipeline of teachers qualified in inclusive education teaching our students with disability.
* Supporting our teachers and investing in their professional development.
* Strengthened inclusive practice and pedagogy across NSW public schools through a highly skilled workforce.

#### What will success look like?

* Teachers are confident and equipped to teach students with disability.
* Students with disability are learning to their fullest capability across NSW Public Schools.
* Students with disability have a sense of belonging across NSW Public Schools.

#### How will success be measured?

* Feedback from scholars.
* We will explore an evaluation of the program aimed at understanding the impact of the training on our teachers and the impact on students with disability.

#### Key project milestones

Under the Inclusive Practice in Education scholarship, by 2025/26, there will be an **additional 350 teachers qualified** in inclusive or special education.

#### Project Governance

* Division: Learning Improvement / Chief People Officer
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Disability Strategy / Director, Teacher Talent

## Integration Project Feedback Mechanism

### Project summary

#### Objective

Capture data on the experience of students and staff who have requested adjustments as part of Integration Projects, after the completion of the project.

#### The Benefits

Collection of data and information can ensure we are meeting our obligations under the Disability Standards for Education and provide valuable information to feed back into the design process and School Infrastructure’s Education Facilities Standards and Guidelines (EFSG) design requirements.

#### What will success look like?

School Infrastructure will have an accurate measure of whether Integration Projects scopes are meeting the user’s requirements.

#### How will you measure success?

Data collection process will be in place and findings communicated with relevant teams.

#### Key project milestones

* Project initiation
* Internal stakeholders consulted (DoE data collection depts?)
* Post Occupancy inspection
* Feedback sessions provided with Integration Project Teams / Design Advisory Team

#### Project Governance

* Division: School Infrastructure
* Project executive: Executive Director, Asset Management
* Project lead: AMU Directors

## Mandated Disability Standards training for school leaders

### Project summary

#### Objective

* Every school leader\* understands their legal obligations under the Disability Standards for Education (DSE) and uses it as a first step in building an inclusive school culture.
* Encourage more staff to complete the e-learning modules

*\*School leaders are defined as Directors, Education Leadership, Principals, Deputy Principals, Assistants Principals and Head Teachers.*

#### Benefits

* Create cultural change in all schools to support inclusion of students with disability.
* Increase teachers’ confidence and ability in teaching students with disability.
* Create a fundamental foundational knowledge in supporting students with disability, to support continued professional learning for students with disability.

#### What will success look like?

* Students with disability are learning to their fullest capability and on the same basis as students without a disability.
* Teachers are equipped with the knowledge to identify opportunities and implement adjustments with confidence.
* Families of students with disability feel included in the process of identifying and implementing reasonable adjustments, and welcome to the school.

#### How will success be measured?

* Monitoring completion of the Disability Standards for Education Leaders course.

#### Key project milestones

* **Ongoing:**All Education Leaders complete the mandated training
* **Ongoing:**Newly appointed leaders are engaged early to enrol and complete the training

#### Project Governance

* Division: Learning Improvement
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Disability Strategy

## Needs based assessment for targeted disability supports

### Project summary

#### Objective

To reform the way targeted disability supports are accessed by and allocated to students with higher learning and support needs.

#### Benefits

These reforms will ensure the allocation of disability supports is informed by a functional assessment of a student’s needs to support learning, and is linked to the adjustments schools are making to support students.

This will support students to access and fully participate in learning supported by reasonable adjustments and quality teaching strategies tailored to meet their individual needs.

#### What will success look like?

* Eligibility for targeted disability support is informed by a systematic and consistent assessment of a student’s functional needs
* Eligibility for targeted supports is reorientated toward better understanding the supports and adjustments required to enable students’ full access to education
* There is an improved link between the resources provided to schools and the level of adjustments they are providing to students
* The systems associated with the allocation of targeted disability provisions are streamlined, promote collaboration between schools and families, and reduce administrative and diagnostic burden.

#### How will success be measured?

* Students with similar learning and wellbeing needs are eligible for similar levels of support
* Supports for students with disability are put in place more quickly
* Better quality of information to assist families and schools think about the most suitable adjustments to support a student’s needs
* The resources provided to schools are more directly related to the adjustments to enable the student to participate in education on the same basis as their peers
* Schools feel the systems around student eligibility for targeted provisions support them to meet their inclusion obligations
* Increase in the skills and resources of school staff to identify students’ functional needs, and ability to respond with appropriate supports and adjustments
* Schools and families continue to be actively involved in consultation, collaboration and co-design.

#### Key project milestones

* Review the Department’s current functional assessment tools and processes to ensure they are consistent with contemporary understandings of disability**(December 2021)**
* Align all systems and processes related to the assessment and allocation of targeted disability supports with needs-based approaches **(December 2022)**

#### Project Governance

* Division: Learning Improvement
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Inclusive Education

## NSW Destinations Survey

### Project summary

#### Objective

The Destinations Survey provides a platform for the NSW Department of Education to identify trends in, and correlates with, post-school education, training and employment destinations of secondary school students in NSW. The Destinations Survey provides critical information on post-school education pathways and attainments of young people in NSW, and the factors that drive students’ engagement, retention, educational achievements and pathway choices.

#### Benefits

Through the Disability Outcomes Framework, the department has identified that we currently do not have good measures of the post-school outcomes of students with disability. Including disability-themed questions in the 2021 Destinations Survey and linking to department-held administrative data about the adjustment’s students receive at school (NCCD data) will enable a measure of these outcomes.

Working closely with our colleagues in Inclusion and Wellbeing and contracting the Centre for Inclusive Design will enable us to improve the inclusivity and accessibility of the Destinations Survey. This will not only improve the survey experience for all respondents, it will also increase the quality of survey data.

#### What will success look like?

The department will have a measure of the post-school outcomes of students with disability that can be used to deliver the department’s commitments under the Disability Outcomes Framework.

The accessibility and inclusivity of the Destinations Survey is improved. All respondents have the agency and confidence to accurately answer survey questions.

#### How will success be measured?

This work will be successful if we have a measure of the post-school outcomes of students with disability, including information about the school level adjustments that may be correlated with these outcomes.

This work will be successful if we take on feedback and guidance from the Centre for Inclusive Design and improve both the survey questions and survey platform to increase inclusivity and accessibility.

#### Key project milestones

* Contract the Centre for Inclusive Design to undertake a heuristic review of the Destinations Survey instrument and online platform and to test the survey questions with a variety of users: April – October 2021
* Improve the Destinations Survey based on feedback from the Centre for Inclusive Design: May – November 2021
* Work with Inclusion and Wellbeing to include some additional disability themed questions in the 2021 Destinations Survey: May 2021
* Work with CESE’s Data Governance team to update survey consents for the Destinations Survey to enable linkage with NCCD data: May 2021
* 2021 Destinations Survey is in field: July – November 2021
* Findings on the post-school destinations of students with disability available from the destinations survey – December 2021 (internally) April 2022 (for public reporting)

#### Project Governance

* Division: Education and Skills Reform
* Project executive: Group Director, CESE
* Project lead: Principal Project Delivery Officer, Evaluation and Effectiveness, CESE

## Plan for professional learning in disability

### Project summary

#### Objective

The project seeks to enhance teacher capability to support students with disability and improve inclusive practice.

#### Benefits

Increasing the range of professional learning options in disability will support teachers to:

* improve knowledge and skills to meet the needs of students with disability and meet legislative responsibilities as outlined in the Disability Standards for Education (2005)
* meet NSW Education Standards Authority (NESA) accreditation requirements in the identified priority area of disability.

#### What will success look like?

* Teachers and leaders in schools will have access to a wider range of professional learning and supports to build capacity to develop a more inclusive school culture and improve inclusive pedagogy.

#### How will success be measured?

* the development of a plan to enhance the department’s professional learning in disability
* an increase professional learning courses with a specific focus on disability to align with NESA priority areas in professional development
* an increased focus on disability and reasonable adjustments in non-disability specific professional learning available, including mandatory courses for teaching and non-teaching staff.

#### Key project milestones

* Discovery and consultation reports: **completed.**
* Professional learning plan developed: **September 2021**
* Implementation of professional learning plan: **Ongoing from September 2021**

#### Project Governance

* Division: Learning Improvement
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Disability Strategy

## Redesign of NSW VET funding streams

### Project summary

#### Objective

The objective of this project is to ensure the design of funding streams is well aligned to strategies that lead to positive training and employment outcomes (including specifically for students with disability).

The Project will take a deep dive into addressing the following four policy objectives:

1. Increasing access and participation from students who experience disadvantage through training that typically leads to strong outcomes.
2. Ensuring students have access to training supports and services that are appropriate to their individual needs.
3. Improving system expertise for complex needs students – by increasing the availability and depth of specialist expertise across the sector and linkages to other sectors.
4. Providing greater clarity, transparency and evaluation of Government funding to ensure its use is effective and efficient in supporting students to achieve strong outcomes.

Outputs are dependent on stakeholder consultation and Ministerial/ NSW Government approval but may include changes to existing funding streams and the development of new programs or initiatives.

*Note: Separate project plans will be developed once key changes have been agreed.*

#### Benefits

Around 10% of Smart and Skilled program commencements are by students with disability. Improving outcomes for these students will lift the performance of the NSW VET system and lead to significant benefits to individuals, employers and broader society.

#### What will success look like?

A successful project will deliver changes to address the four policy objectives outlined above, which focus on:

* improving participation in training that leads to typically strong outcomes
* increasing completion outcomes for students who experience disadvantage
* deepening specialist expertise and linkages to other sectors to support complex needs students
* improving transparency and evaluation of Government funding.

#### How will success be measured?

Success will be measured using a mix of output and outcome metrics.

The delivery of outputs – such as changes to funding formulas and payment models, IT systems, provider requirements in Contracts/Policies, new programs or initiatives – will be the basis of successful delivery of project deliverables.

The Project will also focus strongly on establishing regular milestones to evaluate the outcomes that are achieved (or not achieved) through any changes, particularly focusing on participation, completion and employment benefits.

#### Key project milestones

Work to progress the objectives above has been underway since September 2020. Upcoming project milestones include:

|  |  |
| --- | --- |
| Milestone | Timeframe |
| A second round of consultation on proposed policy changes | July – Sep 2021 |
| Ministerial approval of recommended changes | October 2021 |
| Ongoing implementation of changes | Late 2021 - Early 2022 |

### Project Governance

* Division: Education and Skills Reform
* Project executive: Director, Training Market Design
* Project lead: Senior Policy Officer, Training Market Design

## Smart Accessible Classroom

### Project summary

#### Objective

Advancements in technology have seen the advent of smart homes and buildings become the norm rather than the exception, so what about the application of the concept and tools in the classroom and corporate offices?

The Technology 4 Learning Team in conjunction with other specialised teams from across the department are determined to explore the concept and work to determine its viability as well as its affordances to make both classrooms and corporate offices more accessible to all users.

The project aims to explore the affordances of smart home technology to empower a number of scenarios. With respect to the Disability Implementation Action plan a number of these are relevant:

**Accessibility in and to the classroom / corporate office**

Smart access

Smart furniture

Smart beacons / guidance systems

**Routines to decrease task physicality in the classroom / corporate office**

Environmental monitoring and automated routines (e.g. increased temperature >> blinds down and aircon on)

Smart routines (end of day / start of day / holiday periods)

Classroom routines

Smart infrastructure (lighting / blinds / sound / air systems)

**Learning opportunities delivered through smart classrooms and increased awareness of universal design principles**

Individualised classroom support

Coding and computational thinking opportunities

The project aims to identify possible solutions for new build projects as well as possible packs for implementation in existing buildings.

#### Benefits

The project aims to alleviate hurdles to empowered access to spaces and experiences in the classroom. It will enable all users to without assistance access and utilise spaces as equal participants in both work and learning.

#### What will success look like?

The project’s success factors tied to the Disability Implementation Action Plan are listed below, note there are additional success factors for the project team in addition to the information below tied to ethical, technical and other aspects of the project.

|  |  |  |
| --- | --- | --- |
| Success Factor | Success Looks Like | Notes |
| Accessibility | Classroom accessible to all students and teachers (Qualitative assessment by accessibility team)  Corporate offices more accessible to corporate staff  (Qualitative assessment by accessibility team) | Focus Group / Survey  Focus Group / Survey |
| Timesaving / Physicality | Time saving routines or routines that decrease physicality are able to be developed and identified as useful by classroom and school users (Qualitative assessment) | Focus Group / Survey |
| Teaching and learning | Smart classrooms empower individualised programs that allow for a focus on Universal Design Principles | Focus Group / Survey |

Once completed the project team will:

* Provide a written report to the Disability Implementation Action Group
* Release possible implementation models in the form of a feature article in Magazine.T4L and also provide advice to teams from Schools Infrastructure for incorporation in to new and refurbishment projects for both corporate and school sites
* Work with procurement to ensure the inclusion of these tools on EdBuy (STEM Tools)
* Deliver a discussion of the project with key industry stakeholders on the Virtual Staffroom Podcast
* Facilitate online and in person professional learning sessions to groups as required

#### How will success be measured?

As outlined above the projects success factors are largely qualitative and will be derived from both focus groups and surveys completed during the pilot stage.

These pilots will cover the multitude of scenarios and span both corporate and school sites.

Additionally, the teaching and learning aspects will be assessed by curriculum specialists from the Disability and Inclusion team.

#### Key project milestones

The project will proceed in a number of stages, with the administrative aspects large project dependencies and as a consequence early gates to the project. Classroom and corporate scenarios, implementations model and tools will be engaged early (to enable the administrative aspects to be explored) and developed further based on the success of the administrative aspects of the project:

|  |  |  |
| --- | --- | --- |
| Project Stage | Timeframe | Notes |
| Project Scoping | Term 2 Week 2 | Complete |
| Base Tool Identification | Term 2 Week 2 | Complete (stage 1) |
| Technical POC | Term 2 Week 10 | Dependent on above steps |
| Classroom Scenario / Corporate Office Scenario Development | Term 3 Week 7 | Dependent on above steps (Tools available) |
| Ethical and Legal Considerations | Term 3 Week 10 | Work to begin post technical POC (Initial testing coverage complete) |
| In School / Corporate Office Pilot | Term 4 Weeks 2-6 | Dependent on above steps |
| Publication of Implementation Models | Term 1 2022 | Dependent on above steps |

#### Project Governance

* Division: Operations Group
* Project executive: Executive Director, Customer Experience and Service Delivery (CESD)
* Project lead: Lead, Schools Technology Innovation

## Standard Accessibility Details

### Project summary

#### Objective

This project will develop standardised details for common accessibility upgrade items, such as ramps, Tactile Ground Surface Indicators (TGSIs), handrails etc, to ensure all contractors are building to accessibility standards and/or enhanced Educational Facilities Standards and Guidance (EFSG) requirements.

#### The Benefits

All new work, which falls outside of formal approval pathways (for example minor works such as the replacement of a handrail or installing new TGSIs as part of an Integration Project) will have standardised approach documentation, which can be shared with project teams and contractors undertaking work on behalf of Asset Management Utility (AMU).

#### What will success look like?

All minor works achieve compliance with relevant Australian Standards and the EFSG. These requirements are communicated effectively and consistently to designers and contractors. All upgrade or replacement works improve the accessibility of the environment for all users.

#### How will success be measured?

Reduction in time communicating requirements to contractors, less rectification works required, all assets have consistent quality and compliance.

#### Key project milestones

* Project inception
* Template for standardised details to be developed
* Pilot detail trialled
* Internal SINSW stakeholders consulted
* Feedback from relevant business areas received incorporated
* Master list of standard details developed
* Standard details created
* Review process for standard details
* Uptake review with AMU
* Ongoing updates / additional standard details developed

#### Project Governance

* Division: School Infrastructure NSW
* Project executive: Executive Director, Asset Management
* Project lead: Manager, Disability Standards

## Start Strong Connections

### Project summary

#### Objective

The objectives of Start Strong connections are to:

* Build the research and evidence base for transition to school for children with disability and additional needs, to inform future policy and program development.
* Increase the capacity of early childhood educators to support children with disability and additional needs and their families with early intervention and the transition to school process.
* Identify, document and promote a best practice service coordination model to support children with disability and additional needs who are transitioning to school, and support their families.

#### Benefits

Research shows that children with disability and/or additional learning and support needs who are provided with transition to school support experience improved academic and social outcomes.

#### What will success look like and how will it be measured?

|  |  |  |
| --- | --- | --- |
| Objective | Outcome | Indicator/s |
| 1. Build the research and evidence base for transition to school for children with disability and additional needs to inform future policy and program development. | There is robust research available into transition to school for children with disability and additional learning needs. | Literature review complete  Research projects identified, and funded  Research complete/published |
| *See Objective 1.* | The school is ready for the child day one of Term One. | Number of pilot programs that offer targeted supports and services  Number of children/schools/preschools supports or services are delivered to  Number and type of reasonable adjustments made by the schools involved, and whether these are ready for the beginning of the school year. |
| 2. Increase the capacity of early childhood educators to support children with disability and additional needs and their families with early intervention and the transition to school process. | Early childhood educators and schools have the information, skills, resources and networks they need to support a best-practice transition to school process for children with disability and additional needs. | Feedback from early childhood educators  Number of professional development/training sessions delivered  Number of resources developed  Number of networking sessions held/networks identified and/or developed |
| *See Objective 2.* | Strong data and information sharing channels exist to support early intervention and transition to school, and to encourage a holistic, collaborative approach. | Online transition to school statement (and related resources) are available, and inclusive of children with disability and additional learning needs  Data from the Disability and Inclusion program, and other relevant data sources is shared within the Department, and more broadly where possible/relevant (including through the National Disability Data Asset pilot ECE project)  Definition of disability and additional needs clarified through National Disability data asset pilot ECE project |
| *See Objective 2.* | Children participate meaningfully in all aspects of the school community from day one of kindergarten. | Reasonable adjustments data from primary schools (i.e. number of reasonable adjustments identified and made on schedule)  Feedback from families |
| 3. Identify, document and promote a best practice service coordination model to support children with disability and additional needs transitioning to school and their families. | There is an evidence-based, best practice and ‘business as usual process’ for ECE services, schools and families to follow for children with disability transitioning to school that is widely available and accessible for families, ECE services and schools. | Best practice process/processes identified  Process is documented and promoted through various, audience appropriate channels  Website downloads of processes documents  Feedback from pilot projects using the process |
| *See Objective 3.* | Stronger transition to school networks develop between schools and ECE services. | Number of ECE and DoE primary school staff using the online transition to school statement |

#### Key project milestones

This project is currently in re-scoping phase, after not being resourced for the previous two years. The timelines for the project milestones identified below will be developed once the project lead is recruited later in 2021.

* Literature review (draft completed)
* University research projects underway
* Transition to school process is mapped
* Begin pilots of innovative and best practice projects on TTS for children with disability
* Make available professional development for ECE educators on TTS for children with disability
* Develop communications resources and materials for key stakeholders
* Support data sharing initiatives related to TTS for children with disability within the Department and across agencies

#### Project Governance

* Division: Education and Skills Reform
* Project executive: Executive Director, Early Childhood Education and Schools Policy
* Project lead: Manager, Strategic Initiatives

## Transition Support Training

### Project summary

#### Objective

Transition Support Training is designed for staff who are members of a school’s Career and Transition team or work with at-risk students. This can include Year Advisers, Welfare team members, Support Teachers Transition (Disability), Refugee Support Leaders (multicultural), Senior Leaders and Aboriginal SLSO’s and executive staff. Experienced teachers and departmental staff present information on current best practice programs, local and international research, and how/where to access human and electronic resources. Participants will have a stronger understanding of how to support students’ transition through and from school, resources available and develop a network of contacts to reduce work-based isolation.

#### Benefits

* Strengthen the knowledge and understanding of transition support for a wide range of teachers and support staff.
* Staff are able to provide advice and support students to make informed transitions through and out of school.
* Collaborative approach to information and program sharing.
* Professional learning is provided that has been Quality Assured (QA) by the Department of Education, and contributes to participants’ identified professional learning hours.
* Professional learning can be delivered virtually to extend the reach across NSW and not disadvantage rural and remote schools.

#### What will success look like?

* Professional learning will be well subscribed.
* Positive feedback from participants.
* Post learning surveys to indicate participants’ confidence and knowledge levels have increased.
* Reduced incidents of student disengagement, non-completion of ROSA or HSC, and non-attendance.

#### How will success be measured?

* Pre and post training surveys.
* Feedback from participants after each day’s training (2 days).
* Additional evidence from schools.

#### Key project milestones

* Training dates are determined by the end of Term 2.
* Training promoted and sessions opened in MyPL by week 5 in Term 3.
* Training EOI’s received and evaluated by the end of Term 3.
* Training delivered Term 4.

#### Project Governance

* Division: Education and Skills Reform
* Project executive: Director, Pathways and transitions
* Project lead: Student Pathways Adviser, Pathways and Transitions business unit

## Trauma-informed practice for NSW Department of Education staff

### Project summary

#### Objective

The vision is to transform the NSW Department of Education into a trauma-aware system. This will be achieved by giving staff across the state access to a continuum of professional learning in trauma-informed practice (TIP), comprising a foundation course and two advanced courses, supported by a network of experienced facilitators. These courses will provide resources to train, “school and departmental leaders in evidence-based approaches to support students with disability” which is a commitment articulated in the Disability Strategy. Furthermore, the courses will meet commitment 1.1 from the Disability Strategy, “Build on suite of core, advanced and specialist professional learning”.

#### Benefits

* Teachers have the skills and confidence to work with students impacted by trauma.
* By developing trauma-informed schools we create the conditions to enable students impacted by trauma to engage successfully with education and achieve academic and life outcomes commensurate with their peers.

#### What will success look like?

* Teachers are equipped with knowledge and resources that enable them to identify and support students impacted by trauma
* Students impacted by trauma demonstrate measurable improvements in their learning and wellbeing, including an increased sense of belonging
* Schools across the state are supported to embed principles of trauma-informed practice in their schools.

#### How will success be measured?

* Participant feedback is received through survey responses.
* We will explore additional opportunities for measuring the success of these initiatives, including the impact on students.

#### Key project milestones

* **27 May**- Train more than 200 facilitators to deliver the foundation course
* **1 June** - Complete the pilot for the Advanced Leadership course
* **12 July**– Complete the Pilot for the Advanced Specialist course
* **Term 3**- Establish Communities of Practice across the state to support the rollout of the foundation course
* **Term 3**– Complete the evaluation of both advanced courses
* **Term 4** – Train facilitators to deliver both advanced courses
* **31 December** – Deliver the foundation course to staff at more than 200 schools across the state including those in rural and remote and regional areas
* **Term 1 2022** - Make both advanced courses available to staff across the state.

#### Project Governance

* Division: Learning Improvement / School Performance North
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Director, Disability Strategy / Director, Delivery Support, Student Support and Specialist Programs

## Understanding our assets

### Project summary

#### Objective

Scope a project or projects to gain an understanding of the accessibility or compliance status of our existing assets.

#### The Benefits

This work will help School Infrastructure (SINSW) to identify the requirements on a site by site basis to meet current standards.

#### What will success look like?

The Department to understand at a detailed level the requirements at each site to meet current standards.

#### How will success be measured?

Full extent of work required at each site if an upgrade occurs.

#### Key project milestones

* Digital models of each site, both internal and external, rolling 5 year programme to survey and review each site
* Building Code of Australia (BCA) Assumptions developed and analysis undertaken to understand level of accessibility provided based on date of building completion (using Asset Management System data)

#### Project Governance

* Division: School Infrastructure
* Project executive: Executive Director, Asset Management
* Project lead: Group Director, Asset Management

## Wellbeing for School Excellence

### Project summary

#### Objective

Strengthen schools’ understanding and implementation of the Wellbeing Framework through professional learning and an implementation guide.

#### Benefits

* [‘Using the Wellbeing Framework for School Excellence’ - Professional learning (PL)](https://education.nsw.gov.au/teaching-and-learning/professional-learning/priority-professional-learning/using-the-wellbeing-framework-for-school-excellence) to support all staff in NSW to deepen their knowledge of and ability to engage with the Wellbeing Framework and to assess school programs against the School Excellence Framework.
* The PL also reflects a focus on the Disability Strategy and Inclusive Education statement with them being explicitly referred to, strategies given to support students with disability, a focus on student voice and the major assignment for the course (facilitator training) being directly related to the Disability Strategy and Inclusive Education statement.
* “[Wellbeing for school excellence](https://education.nsw.gov.au/student-wellbeing/whole-school-approach/wellbeing-framework-for-schools/wellbeing-for-school-excellence)” resource is the integration of the Wellbeing Framework and the School Excellence Framework. It supports schools' understanding that wellbeing initiatives and programs can be used as evidence of excellence across the School Excellence Framework. Comprehensive sources of evidence for schools to evaluate school improvement efforts and arrive at judgements as a part of the self-assessment.

In July 2021, the 'Wellbeing for school excellence' resource will be renamed “Achieving School Excellence in Wellbeing and Inclusion” and also integrates the Inclusive Education statement.

#### What will success look like?

* Schools and staff are engaging in the professional learning.
* Delivery Support staff and school staff that are trained as facilitators are delivering the professional learning to additional school staff.

#### How will success be measured?

* Number of professional learning sessions delivered,
* Number of facilitators trained
* Downloads of the “[Wellbeing for School Excellence](https://education.nsw.gov.au/student-wellbeing/whole-school-approach/wellbeing-framework-for-schools/wellbeing-for-school-excellence)” resource from department webpages.

#### Key project milestones

* 12 PL facilitator sessions delivered each year.

#### Project Governance

* Division: Learning Improvement/School Performance North
* Project executive: Executive Director, Inclusion and Wellbeing
* Project lead: Leader, Wellbeing Strategy | Student Health and Mental Wellbeing

## Workplace Adjustments as Business as Usual

### Project summary

#### Objective

All staff and managers are aware of and understand

* the rights of employees with disability to request a workplace adjustment to perform and thrive in their role at work
* workplace adjustments contribute to creating a safe and inclusive workplace
* the processes to implement and fund workplace adjustments

#### Benefits

* Capacity to attract and retain a diverse workforce that reflects, understands, and supports the communities we serve will be increased.
* Inspire others (particularly students with a disability) to see Education as a positive career choice.

#### What will success look like?

* The requesting of workplace adjustments through the employee experience will be normalised and be seen as business as usual.
* All major touchpoints along the employee experience to include information about workplace adjustments

#### How will success be measured?

* Confirmation of workplace adjustment information being included in all major touchpoints along the employee experience.
* People Matter Employee Survey (PMES) results will be used to measure if staff feel their disability is a perceived barrier to success in their role and if staff feel confident in creating and maintaining an inclusive work environment.
* Increase in staff disclosing diversity information in relation to their disability, due to greater awareness and confidence in the support the Department provides.

#### Key project milestones

##### *Phase 1 – Due: November 2021*

1. Develop a formal Workplace Adjustments Policy for people with disability, separate and distinct to that of injury management that frames disability through the lens of the social not medical model.
2. Develop clear internal processes and procedures that align with [PSC adviceExternal link](https://www.psc.nsw.gov.au/culture-and-inclusion/disability-employment/making-the-workplace-accessible) and enable employees with disabilities and their supervisors to have confident conversations around adjustments. These procedures should outline specific timeframes within which adjustments will be implemented and give clear expectations for managers and employees around each step in the process.
3. Collaborate with project and consultation partners on identifying employee life cycle touchpoints where reference will need to be embedded.
4. Develop an employee survey that links self-reporting on disability workforce data with workplace adjustments.

##### *Phase 2– Due: December 2021*

1. Develop and implement a communication plan to promote new policy and procedures to project and consultation partners as well as more broadly across the agency.
2. Identify opportunities to speak/ present at key stakeholder events. Such as PPA and SPC events,

#### Project Governance

* Division: People Group
* Project executive: Executive Director, People and Culture
* Project lead: Lead, Disability and Inclusion

1. United Nations General Assembly, 2006. A/RES/61/106. [↑](#footnote-ref-1)
2. Australian Bureau of Statistics, [Disability, Ageing and Carers, Australia: Summary of Findings](https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release) [↑](#footnote-ref-2)
3. National Consistent Collection of Data set [↑](#footnote-ref-3)
4. The Benefits of Designing for Everyone, Centre for Inclusive Design [↑](#footnote-ref-4)