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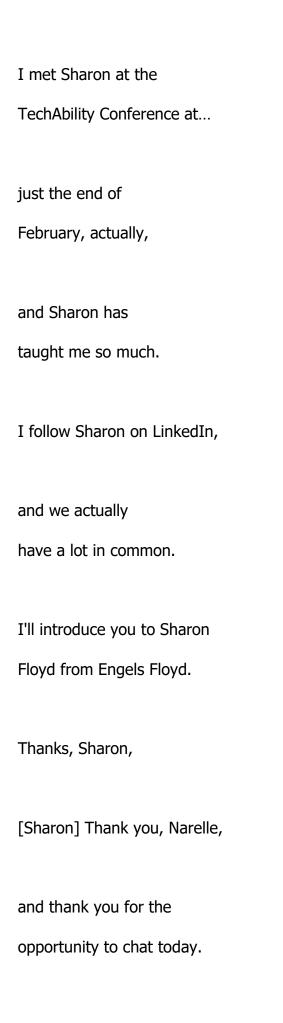
[Narelle] Hi.

Welcome to another episode

of The Digital Access Show,

where we talk

everything accessibility,

usability, communication,

and join it together to

make great communication.

That's a double

word there. Oh well.

I keep doing those things.

Today's guest is someone I'm

really excited to have on board.

I met Sharon at the

TechAbility Conference at…

just the end of

February, actually,

and Sharon has

taught me so much.

I follow Sharon on LinkedIn,

and we actually

have a lot in common.

I'll introduce you to Sharon

Floyd from Engels Floyd.

Thanks, Sharon,

[Sharon] Thank you, Narelle,

and thank you for the

opportunity to chat today.

Like I said to you

a little bit earlier,

this is my first time

involved in a podcast.

So, it's a bit new for me.

But yeah, I'm the Director of

Engels Floyd Quality Consulting.

It's been around

since 2011 as a business.

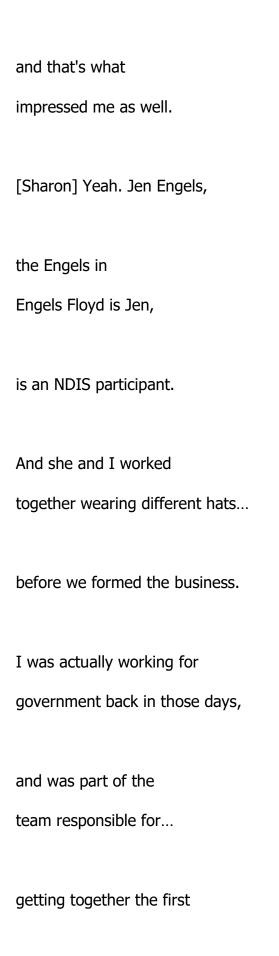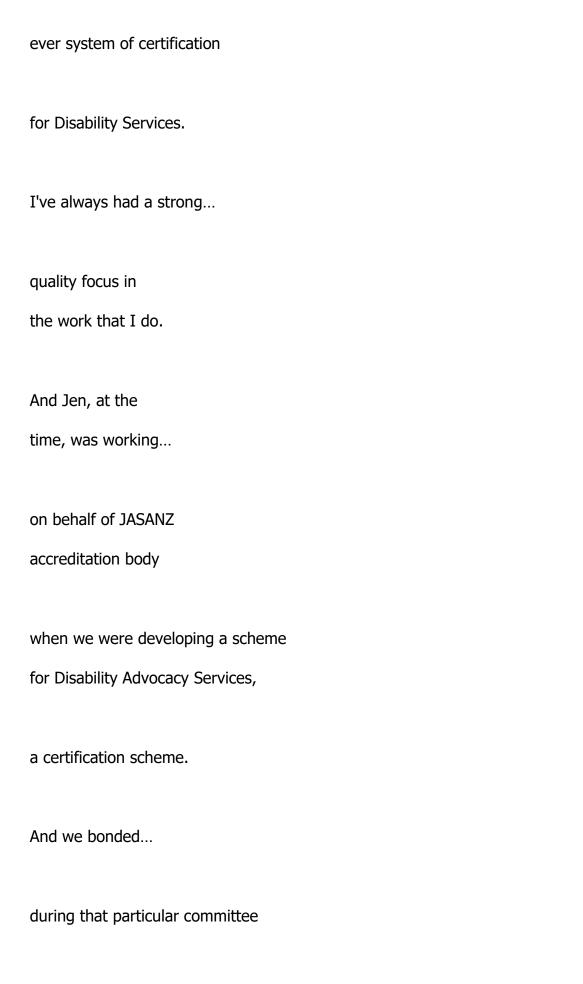Do you want me to, a little bit,

just about the business, Narelle?

[Narelle] I love it, cause

one of the things you have,

is one of your Directors

has a disability,

and that's what

impressed me as well.

[Sharon] Yeah. Jen Engels,

the Engels in

Engels Floyd is Jen,

is an NDIS participant.

And she and I worked

together wearing different hats…

before we formed the business.

I was actually working for

government back in those days,

and was part of the

team responsible for…

getting together the first

ever system of certification

for Disability Services.

I've always had a strong…

quality focus in

the work that I do.

And Jen, at the

time, was working…

on behalf of JASANZ

accreditation body

when we were developing a scheme

for Disability Advocacy Services,

a certification scheme.
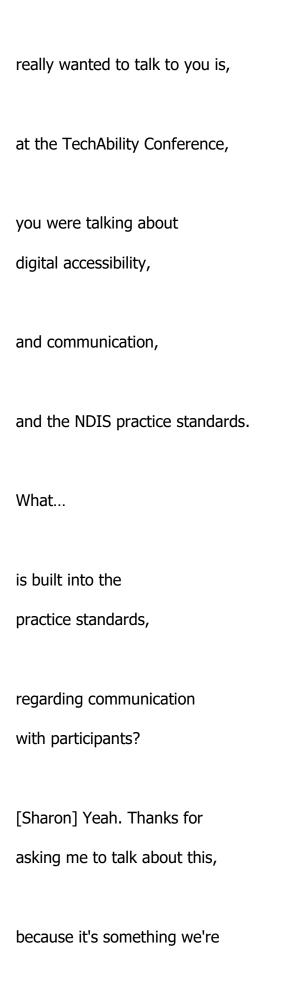
And we bonded…
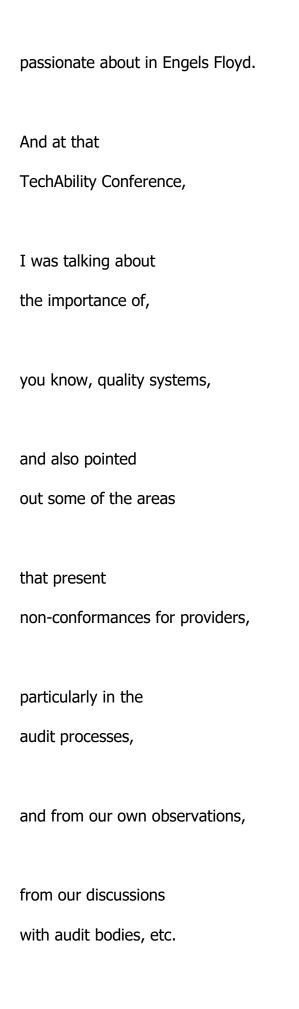
during that particular committee

setting up that scheme,

and we reconnected

when I left government.

We started working together

on a number of projects with,

this is pre-NDIS days.

[Narelle] Yeah.

[Sharon] And then we…

felt that our complementary skill

sets were such that we could,

you know, work together

on some bigger projects.

Around that time,

NDIS came around,

and we were asked to, you

know, work with government on…

developing training

for NDIS auditors,

which we still do to this day.

We've also worked very closely

with a range of NDIS providers

and disability organisations,

and human service organisations

across the country,

all around quality,

quality improvement, compliance,

being audit ready at all times.

We never talk about

preparing for audits,

cause you should

always be audit ready.

And we have a number

of people that work with us,

and for us, that have lived

experience of disability.

And Jen nowadays is Senior

Associate for Engels Floyd.

She stepped down as Director,

but still plays a very pivotal

part in the work that we do,

particularly with NDIS auditing.

[Narelle] Yeah.

So one of the reasons I

really wanted to talk to you is,

at the TechAbility Conference,

you were talking about

digital accessibility,

and communication,

and the NDIS practice standards.

What...

is built into the

practice standards,

regarding communication

with participants?

[Sharon] Yeah. Thanks for

asking me to talk about this,

because it's something we're

passionate about in Engels Floyd.

And at that

TechAbility Conference,

I was talking about

the importance of,

you know, quality systems,

and also pointed

out some of the areas

that present

non-conformances for providers,

particularly in the

audit processes,

and from our own observations,

from our discussions

with audit bodies, etc.

And one of them is

around accessibility,

or the lack of accessible

information for participants.

And…

the NDIS practice

standards are framed in a way

that they actually emanate

from the UN Convention

on the Rights of

Persons with Disability.
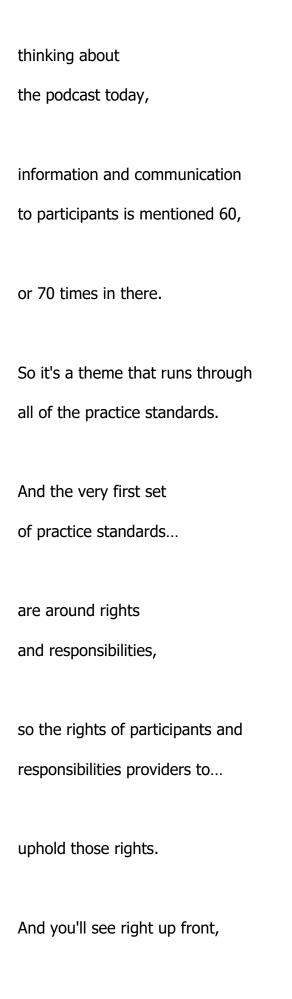
And you would know

better than anyone

that the UN Convention has

been around a long time now,

I think almost 20 years,

and Australia is a

signatory to that convention,

has two articles in

there relevant to this,

and one is about the

rights of people to…

have accessible information…

in appropriate formats

And there's another article

as well that's about freedom,

freedom of speech,

and be able to actually

have access to information,

to be able to make

informed choices and…

decisions, etc.

So,

the NDIS practice standards

are framed in the context…

of not just those articles

from the UN Convention,

but we're just talking

about accessibility today.

And when you look at

the practice standards,

and I actually went

through them the other day,

thinking about

the podcast today,

information and communication

to participants is mentioned 60,

or 70 times in there.

So it's a theme that runs through

all of the practice standards.

And the very first set

of practice standards…

are around rights

and responsibilities,

so the rights of participants and

responsibilities providers to…

uphold those rights.

And you'll see right up front,

there's a requirement

of providers

to ensure that they are

providing information

to participants in the language
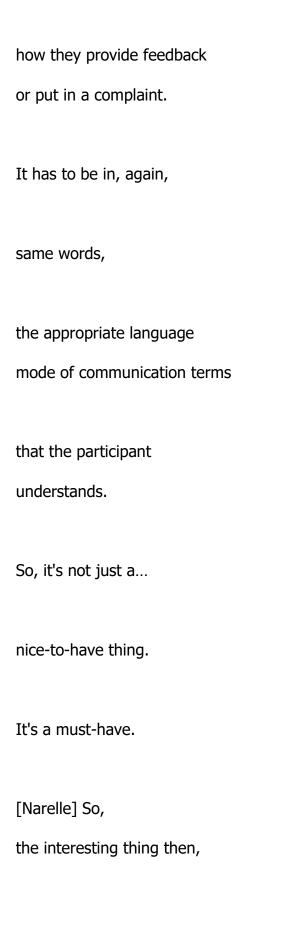
mode of communication

and terms that

participants understand.

[Narelle] Beautiful.

[Sharon] And that's repeated,

as I said, 60 or 70 times,

specific to things like

a complaints process,

you know, for participants

to fully understand…

how they provide feedback

or put in a complaint.

It has to be in, again,

same words,

the appropriate language

mode of communication terms

that the participant

understands.

So, it's not just a…

nice-to-have thing.

It's a must-have.

[Narelle] So,

the interesting thing then,

and as a participant,

I'm always running into…

lack of digital accessibility

in the NDIS sector.

If it is a right and

it's a must-have,

why isn't it happening?

[Sharon] Look, I think,

from our observations,

some participants

sort of struggle with…

being able to provide

information to the diversity…

of communication needs.

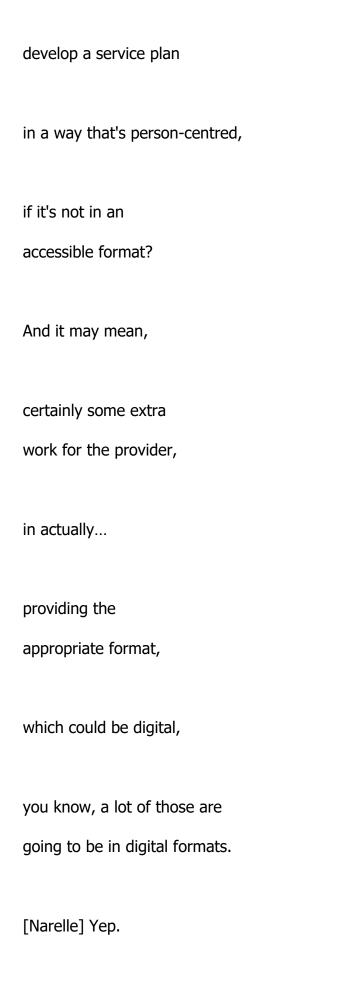They may be able

to provide, say,

an easy-read

version of a document.

They may think, okay.

Well, that's actually meeting

the accessibility requirements,

but they don't actually

drill down to, okay, well,

let's look at each and every

person that we're supporting,

and finding out what their

communication needs are.

[Narelle] Yeah.

[Sharon] And it's as easy as

you know, asking people,

you know,

when they're onboarding

the participant.

So, when a provider

onboards the participant,

there's a range of steps

they need to go through,

you know,

in determining,

you know, their goals,

and how they're going

to support the participant,

doing a risk assessment,

developing a support plan,

service agreement, etc.

-[Sharon] You know all of that.

-[Narelle] Yep. Yeah.

[Sharon] But to

do all of that above,

appropriately,

it has to be done in a

way that's couched in,

again, the appropriate

language and accessible format,

so that it's actually

meaningful for that person.

Because how can you

develop a support plan?

How can you

develop a service plan

in a way that's person-centred,

if it's not in an

accessible format?

And it may mean,

certainly some extra

work for the provider,

in actually…

providing the

appropriate format,

which could be digital,

you know, a lot of those are

going to be in digital formats.

[Narelle] Yep.

[Sharon] For some people,

it may be in other formats.

But again,

that's for the providers,

providers responsibility to work

with each individual participant

to identify the preferred

communication needs,

and then to regularly

review those needs,

as it could well

change over time.

[Narelle] Yeah, it's

an interesting one,

because I like the

words person-centred.

And I'm going to

an expo tomorrow,

and I hear the words,

we are a person-centred group.

Actually, tomorrow

I'm going to ask,

well, as a person-centred group,

do you consider how

people communicate?

For me, it needs to be digital.

It needs to meet the

digital accessibility standard.

-[Sharon] Yes.

-[Narelle] When...

the NDIS providers

come on board,

are they taught about the

digital inclusion standard,

the digital

accessibility standard?

What knowledge are

they given by the NDIS,

and by...

developers, anyone?

[Sharon] It's a good question,

because the digital

accessibility standards,

at the moment,

apply to, you know, government…

entities,

you know, like Interlink and

like the NDIS commission, etc.

[Narelle] Yep.

[Sharon] They don't

actually apply at this stage…

to NDIS providers or

human services generally,

though I imagine over

time that may well come.

-[Narelle] Yeah.

-[Sharon] But…

I'll just come back to

your question in a minute.

But the other thing is,

apart from the UN Convention,

NDIS…

the NDIS providers

are required legally to…

adhere to relevant legislation as

part of NDIS practice standards,

and a case relevant

set of legislation…

is the Disability

Discrimination Act.

And if you're going to

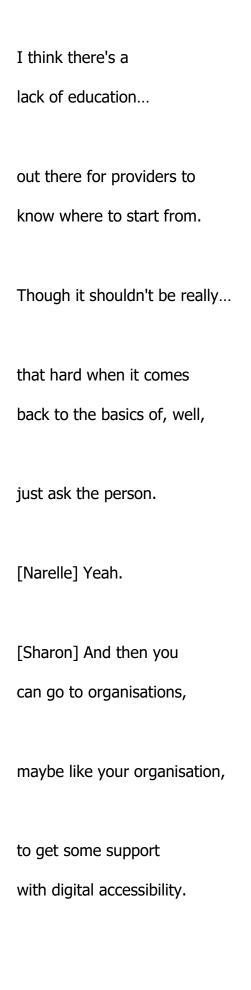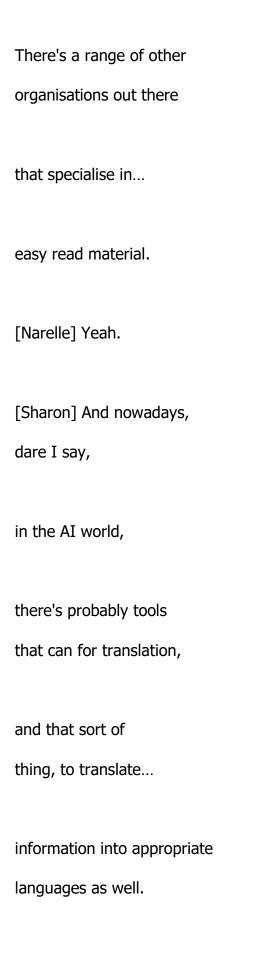meet the requirements,

not just of NDIS but of

Disability Discrimination Act,

you must be providing

accessible information.

But in terms of how providers can

actually be educated, informed,

the NDIS Commission

does provide…

some accessible information

to participants on its website,

and they are targeted

to participants.

And providers are encouraged

to use some of those…

existing tools rather than start
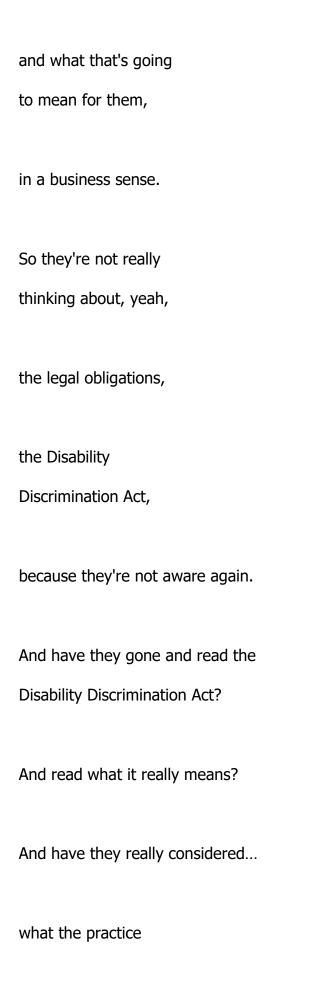
from, like, a blank canvas.

-[Narelle] Yeah.

-[Sharon] But in terms of...

being informed

about things like...

best practice or

even as good practice,

I mean, those digital

accessibility standards,

if you go into the...

government website where

you can read about them,

there's heaps of really good

resources and tools there

that I think is a lack of,

I think there's a

lack of education…

out there for providers to

know where to start from.

Though it shouldn't be really…

that hard when it comes

back to the basics of, well,

just ask the person.

[Narelle] Yeah.

[Sharon] And then you

can go to organisations,

maybe like your organisation,

to get some support

with digital accessibility.

There's a range of other

organisations out there

that specialise in…

easy read material.

[Narelle] Yeah.

[Sharon] And nowadays,

dare I say,

in the AI world,

there's probably tools

that can for translation,

and that sort of

thing, to translate…

information into appropriate

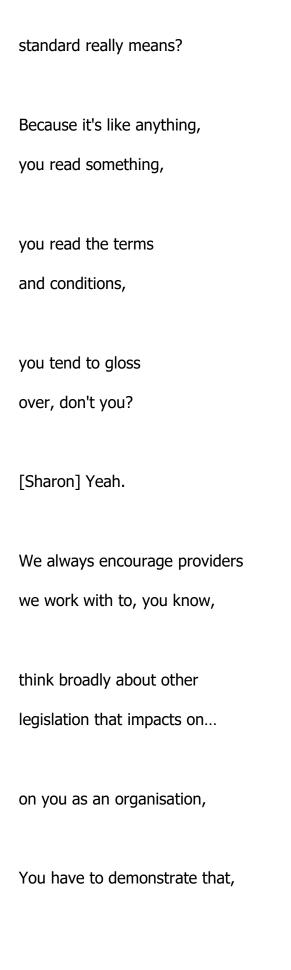languages as well.

-[Narelle] Yeah.

-[Sharon] Yeah.

[Narelle] And this is it.

I agree with you.

I think it's a lack

of education.

And…

Unfortunately, I think NDIS

providers, when they go into it,

they go into it mostly

for the right reason.

-[Sharon] Yeah.

-[Narelle] But they do not…

really think about

what that really means,

and what that's going

to mean for them,

in a business sense.

So they're not really

thinking about, yeah,

the legal obligations,

the Disability

Discrimination Act,

because they're not aware again.

And have they gone and read the

Disability Discrimination Act?

And read what it really means?

And have they really considered...

what the practice

standard really means?

Because it's like anything,

you read something,

you read the terms

and conditions,

you tend to gloss

over, don't you?

[Sharon] Yeah.

We always encourage providers

we work with to, you know,

think broadly about other

legislation that impacts on…

on you as an organisation,

You have to demonstrate that,

through sort of

audit processes, etc,

but then sort of

filtering that information…
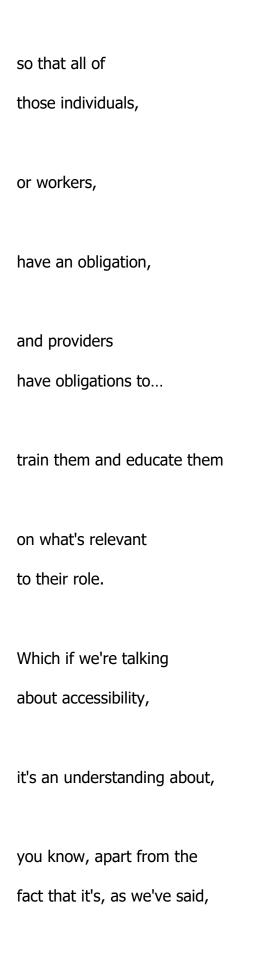

through the organisation,

so that it's not just those

involved in governance

that are aware of those

legal requirements,

that it filters down to, you

know, support workers,

so that they actually

have, you know,

all the key people involved in

those initial onboarding stages,

so that all of

those individuals,

or workers,

have an obligation,

and providers

have obligations to…

train them and educate them

on what's relevant

to their role.

Which if we're talking

about accessibility,

it's an understanding about,

you know, apart from the

fact that it's, as we've said,

common sense,

where it comes from.

You know, it's not

just a nice idea.

There is a legal

requirement for it.

The UN Convention and there's

also the NDIS code of conduct.

Because up until now,

in the chat today,

we've been talking about

the NDIS practice standards,

which apply to

registered providers.

But there's also a whole stack of

unregistered providers out there,

and the numbers

increasing every day.

There's probably roughly about

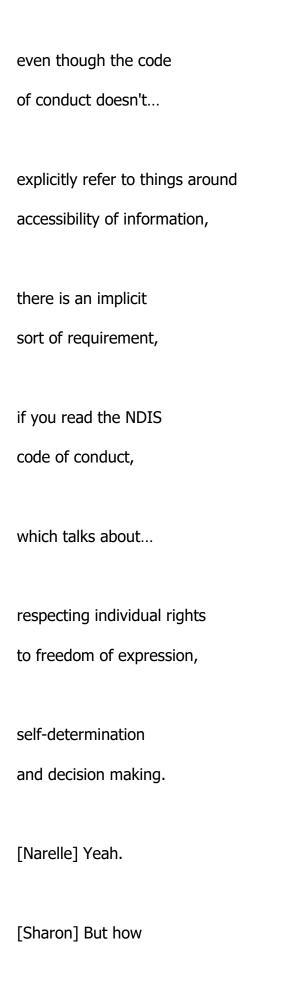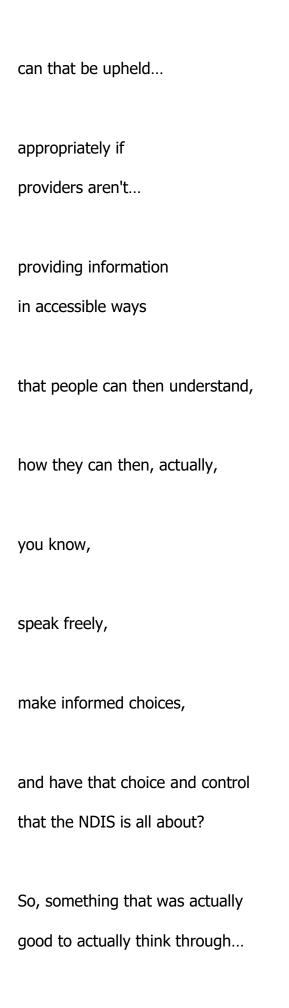280,000 unregistered providers.

-[Narelle] Yep.

-[Sharon] And…

[Sharon] But those providers

don't have to meet…

the NDIS practice standards,

but they are required to abide

to the NDIS code of conduct.

And when you look at

the NDIS code of conduct,

even though the code

of conduct doesn't…

explicitly refer to things around

accessibility of information,

there is an implicit

sort of requirement,

if you read the NDIS

code of conduct,

which talks about…

respecting individual rights

to freedom of expression,

self-determination

and decision making.

[Narelle] Yeah.

[Sharon] But how

can that be upheld…

appropriately if

providers aren't…

providing information

in accessible ways

that people can then understand,

how they can then, actually,

you know,

speak freely,

make informed choices,

and have that choice and control

that the NDIS is all about?

So, something that was actually

good to actually think through…

that prior to the

chat today about…

how this is so important

for all providers,

regardless whether

they're registered or not.

And I think…

unregistered

providers can actually…

go under the radar,

because there isn't a lot

of accountability building.

There's some fantastic

unregistered providers out there,

but their staff may not be aware...

of things like the

code of conduct,

and how that then relates to

what we're talking about today,

about accessibility.

[Narelle] Yeah.

And I suppose that leads

on to the next question then.

So when the NDIS auditors go out,

and how do they even check...

that the provider is meeting

the communication requirements?

Cause they might not necessarily

know about a screen reader,

or a Braille device

or a puff and sip tool, which

is used by quadriplegics,

or whatever it is.

[Sharon] Yeah.

So a couple of things there,

is that NDIS auditors

are required to…

assess providers

against each and every,

what's called a

quality indicator.

And there's 125 of those.
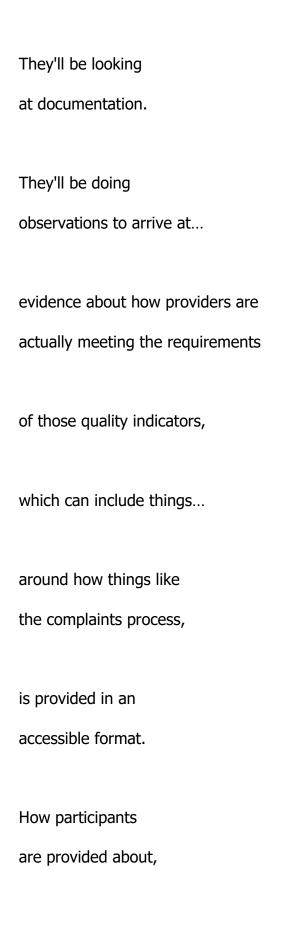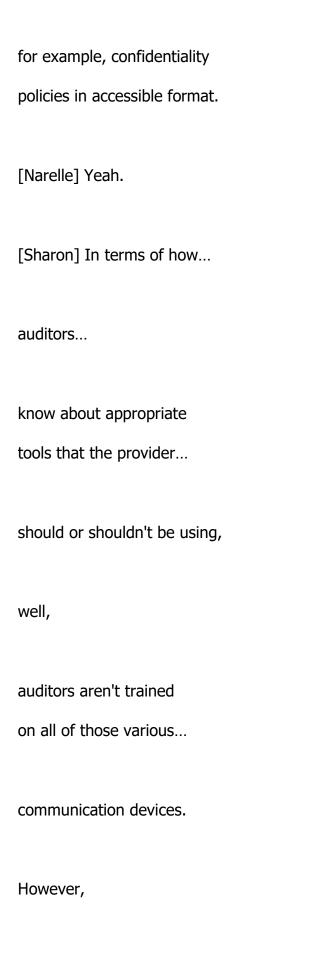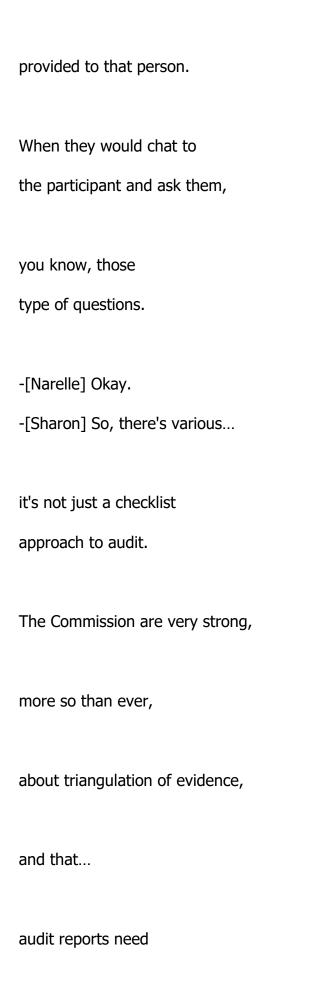
And as I said,

roughly 60 odd of those refer to

information and communication.

So they have to.

They actually have to…

get evidence from the provider

that has to be triangulated.

[Narelle] Yep.

[Sharon] So they'll be

chatting to participants.

They have to do that.

They'll be chatting to a

sample of participants,

a sample of staff.

They'll be looking

at documentation.

They'll be doing

observations to arrive at…

evidence about how providers are

actually meeting the requirements

of those quality indicators,

which can include things…

around how things like

the complaints process,

is provided in an

accessible format.

How participants

are provided about,

for example, confidentiality

policies in accessible format.

[Narelle] Yeah.

[Sharon] In terms of how…

auditors…

know about appropriate

tools that the provider…

should or shouldn't be using,

well,

auditors aren't trained

on all of those various…

communication devices.

However,

prior to the audit,

they're provided with

de-identified information…

about the participants,

so they would

have a sense of the…

disability types within

that organisation.

They're provided with information

from the provider beforehand,

about the participants

that have been randomly
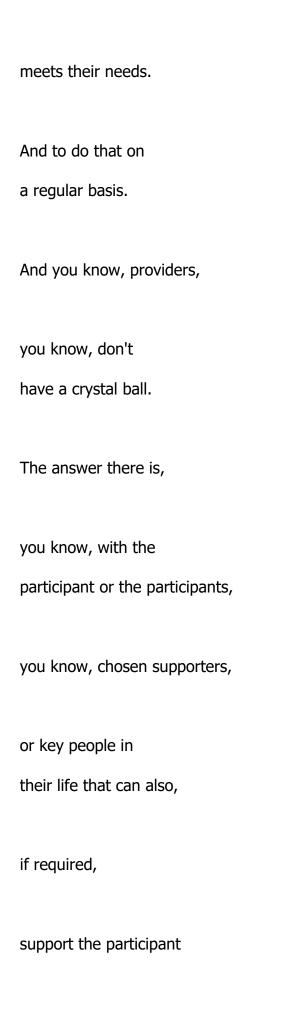
chosen as part of the sample.

Who…

So the auditors would

know in advance, well,

I'm going to be

chatting to participant A,

who has a vision impairment,

and she's, you

know, X age or what,

she's from a particular

cultural background.

So, they'll have that background

information beforehand,

so they'll have an

idea about the type of,

or how that information…

should possibly be

provided to that person.

When they would chat to

the participant and ask them,

you know, those

type of questions.

-[Narelle] Okay.

-[Sharon] So, there's various…

it's not just a checklist

approach to audit.

The Commission are very strong,

more so than ever,

about triangulation of evidence,
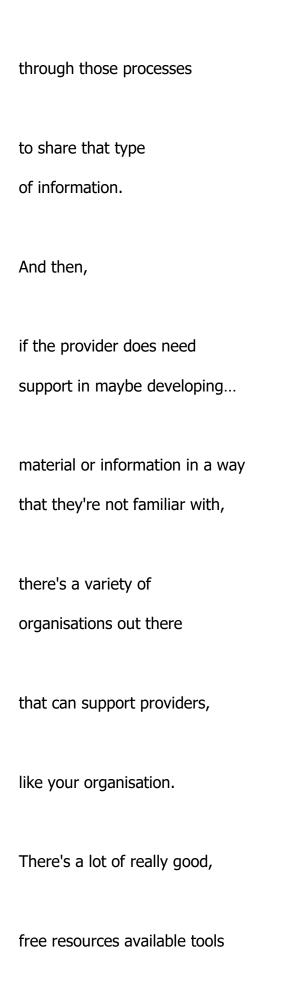
and that…

audit reports need

to be written in a way

that tells the story from the

perspective of the participant.

[Narelle] That's good to know.

Sharon,

what advice would you

give to NDIS providers,

sitting there today and thinking

about what we've discussed?

[Sharon] Okay, yeah.

My advice would be,

when you're next chatting

with your participants,

whether it's part of…

maybe an onboarding process

for a brand new participant,

or when you're

actually having your…

regular review with participants,

might be support plan review

coming up or service agreement.

Sit down with them and

just clarify about how you are,

how the participant

thinks you're fulfilling…

your responsibility as a provider

to be providing

information to them

in a way that best

meets their needs.

And to do that on

a regular basis.

And you know, providers,

you know, don't

have a crystal ball.

The answer there is,

you know, with the

participant or the participants,

you know, chosen supporters,

or key people in

their life that can also,

if required,

support the participant

through those processes

to share that type

of information.

And then,

if the provider does need

support in maybe developing…

material or information in a way

that they're not familiar with,

there's a variety of

organisations out there

that can support providers,

like your organisation.

There's a lot of really good,

free resources available tools

on the NDIS Commissions website

that are targeted

for participants that,

you know, in some cases,

why reinvent the wheel,

if there's some really

good tools already available?

And for example,

on the Commission's website,

there's some really good tools,

again, targeted for participants,

about how to put in a complaint,

how to know if the provider is

providing safe supports to you.

So yeah, there's a

lot of stuff out there.

It's just sometimes navigating

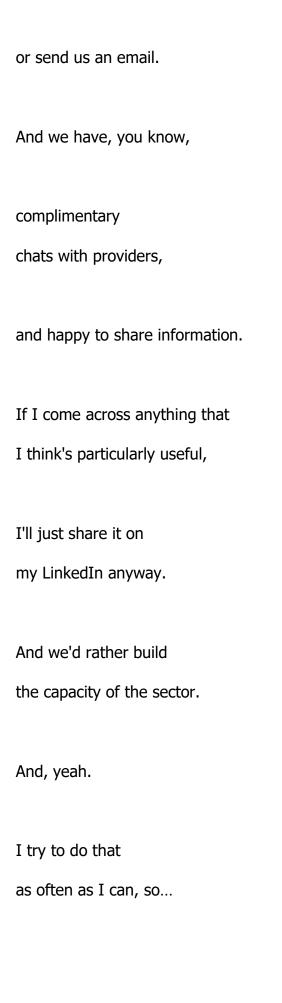how to find that information.

[Narelle] Yeah.

And to be honest,

they could talk to you,
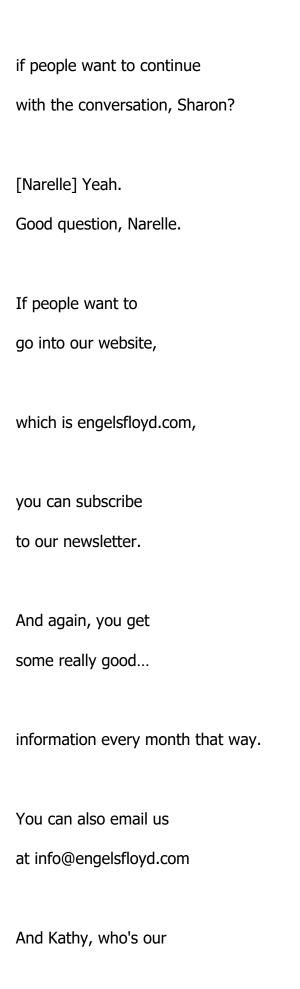
about how to find

information as well,

and your work is with

the NDIS providers.

[Sharon] Yeah. We

do do a lot of that,

and we're always happy for

providers to pick up the phone,

or send us an email.

And we have, you know,

complimentary

chats with providers,

and happy to share information.

If I come across anything that

I think's particularly useful,

I'll just share it on

my LinkedIn anyway.

And we'd rather build

the capacity of the sector.

And, yeah.

I try to do that

as often as I can, so…

[Narelle] Awesome.

Sharon, thanks again.

I've really appreciated

your time today.

And 60 to 70 times

in the practice manual,

and then in the code of conduct.

I wasn't aware of that.

You know, I keep

saying how much I learn,

And like every time I do

a podcast, I've learnt.

How can they get

in contact with you

if people want to continue

with the conversation, Sharon?

[Narelle] Yeah.

Good question, Narelle.

If people want to

go into our website,

which is engelsfloyd.com,

you can subscribe

to our newsletter.

And again, you get

some really good…

information every month that way.

You can also email us

at info@engelsfloyd.com

And Kathy, who's our

amazing Client Manager,

will get back to

you almost instantly,

and organise a

time to chat with us.

There is also a 1-300

number on our website,

but I don't know what

that is off by heart.

I'll have to go and check.

But also,

I'm really happy for people

to connect with me personally,

on LinkedIn.

We have an Engels Floyd Quality

Consulting LinkedIn as well.

But you know, we're very,

we've been around a long time,

decades, all of us,

so being a dinosaur,

we're a bit old school

in a lot of respects,

but we're really happy with it.

Actually, I think being

around a long time is a bonus.

We have lots of

expertise to share.

But very happy to chat to people,

about anything to do with…

NDIS quality, but particularly

around accessibility.

[Narelle] Yeah. Thanks, Sharon.

So, that's another episode

of The Digital Access Show.

If you like what we do, please,

like, subscribe, review.

Give us feedback,

and I say every time,

even the ugly feedback's great.

And we'll see you next time.

Have a good week.

[music playing]