

# **Attachment A**

**Mark Tonga – Submission to City of  
Sydney’s Draft Inclusion and Access  
Policies**

1 April 2019

**From:** Mark Tonga

**Re:** City of Sydney's Draft Inclusion and Access Policies

Thanks for the opportunity of commenting on these Draft Inclusion and Access Policies.

I have not had the opportunity to discuss this Commentary with my fellow Committee members, so it is given fully in my personal capacity – As a frequent visitor to and lover of, this city.

This discussion was to be a line-by-line examination of the Policies. However, I quickly noticed, with respect, a failure of governance that such an examination would not address.

i.e The Draft Inclusive and Accessible Public Domain Policy commences (emphasis added):

*“The City of Sydney (the City) is committed to being an inclusive and accessible city for all, now and in the future. The City **seeks to meet its legislative obligations** under the Disability Inclusion Act 2014 (NSW) and the Disability Discrimination Act 1992 (Cth) and create a truly inclusive city.”*

For the many reasons above, especially the example that could be set, I thought Council could with all proper governance *do much better*, of at least strictly meeting its legal obligations – It is the law! – and then perhaps trying to exceed them – e.g. :

*“Council ... **shall meet its legislative obligations** ... and to use its best endeavours to investigate where it may prudently and reasonably improve on its performance for the benefit of all that Council has a duty to”.*

Anyway, essentially the die is cast with this lot of paper. These Policies are years in the making, generally similar to others in this area, no better and no worse and will be approved soon.

Nevertheless, I respectfully suggest that we can start preparing *now* for the next, *much better way* to apply our vision. A root and branch reappraisal, by switched-on outsiders, of what we've been doing or not doing.

So now metaphorically I'm in my chair rolling over the bare ground on where will be constructed Council's 2022 Access & Inclusion policies. May I suggest a few points to guide the contractors on this build.

**We know that Improvement in Access & Inclusion is worth it.**

The City of Sydney Council is of course directly responsible for local government services for its residents, proprietors and many, many visitors – lets call the total of this mandate, "*the million who spend and have spent on them a billion*"- but it can and should be much more – Council has the intellectual resources to be the gold standard of good governance, *of policy best practise* for local government throughout this state, and perhaps Australia.

Its self-evident that in 2019, aside from the simple better quality of life for all through engagement with each of the million, *best practice by the Council pays for itself*. – Just as much as good accounting practise or risk management. Indeed, the Draft Policies acknowledge the economic benefits, *so let's not merely do half the job next time on these policies*.

Its not charity. Its simply financially prudent for Council to get its social policies right *and by staying connected* to the million to keep them right – *to adapt, and promptly adapt again for this fast changing world*.

These Draft Access and Inclusion policies now before the Council are certainly highly detailed. Does such detail *of itself* mean they are of merit? Can we do better next time?

**Some principles:**

**Know, really know, where you want to be.** The management guru the late Steven R. Covey – used the metaphor of an "efficient" taskforce on a mission to construct a road

through difficult jungle - With apologies for my incomplete summary: the construction workforce is efficiently structured, with many labourers, including trainers, cooks, logistic experts and with many allied resources e.g. machete sharpeners, tent constructors etc. Fast progress is being made. Then at one point the CEO climbs the highest point, looks out and observes: “*Wrong jungle!*”. The lesson: Efficiency is not effectiveness. We must *first* craft (and it takes insight) in simple terms, “*What do we want to achieve?*” and to keep that in front when loading in all the technical detail – and to regularly revise this-after empathetically liaising with the million – what *now* do we want to achieve?

**Walk the talk on Inclusion right from the start.** If we’re crafting a written policy for a particular demographic, they should be in the room *at the start and during all* the process working alongside the policy writers. *Not “consulted” with after the initial drafting* – whether its re matters concerning indigenous, refugees, the homeless, public housing residents, LGBTIQ, and yes those who live with a disability and their associates.

Having those who properly identify ‘in the room’ on Policy drafting is a big deal. We know in our hearts that identity is not a life style *choice*, it’s a part of you, like your skin. Others can study about, work for and with the group, but (if that’s all that are involved) its always a compromised vision, and certainly less credible with those affected. Authenticity is now the currency. So better get it or fail in your Mission.

I recall a so called ‘able bodied’ male, playing serious level rugby, feeling 10 foot tall and bulletproof, who saw serious injury all around in contact sport. Yep, he was concerned, and donated and helped, but true authentic empathy? ... Nothing, nothing prepared him for the mindset when suddenly, like a never-ending nightmare, he would require a machine to breathe, people treating him as a vegetable and 24/7 care. You adapt to the blackness, but never fully. So don’t have just “suits” *solely* in the policy engine room, or *solely* making the decisions about your compadres. They never reallyly “get” it. They can’t.

**Much “consultation” is lazy and lousy governance** - top down, patronising, curated questions, tokenistic, reactive. E.g. I’ve known of expensively crafted advertising campaigns for “disability” issues – sent for consultation with a “Disability” NGO when the ads have already been produced. A waste of your money. An insult. The ugly truth is

that many of the demographic “consulted” in a 28 day commentary period are cynical, justifiably so, about whether their valid concerns are acted on. Sure they get a paragraph in a later summary of responses.

**Better consultation in this Policy area is pro-active, almost in your face.**

Employ interviewers, always led by someone of the group you seek, who search out and really listen to, all who could be in the mandate. Hugh McKay is forthright as to how qualitative listening gives more valuable insights, often counter-intuitive than ticking boxes on questionnaires. Most prepared written surveys on ‘social’ issues are a dangerous fallacy. How these are composed, and the pseudo importance to their data is bureaucracy’s Cargo Cult. Let’s not even get started on diabolical ‘Push Polls’ steering opinion

Many don’t respond to call-outs in a lazy Consultation process. By definition, if the street level members of a particular group are less responsive to generic public requests for a response for comment on a policy, whether through apathy, confusion, cynicism or less verbal ability to communicate, you will get a skewed response from only a fraction of the demographic, or merely a filtered response from their industry advocates. Its not authentic and the learning is patchy when its not misleading.

**Labels matter.** *“Disability” is a subliminal perjorative for many.* It’s a negative. Someone who is “the other”. Someone of less capacity, literally of less ability (than who?). Perhaps sooner than you think, the “D” word will be as offensive as the “N” word is now.

Every one of the million in the Council’s mandate is diverse in their own way. So how about incorporating *a higher standard into the “D” label* by changing the grammar to the positive, e.g. “Access Inclusion Seekers” (“AIS”)? The fact is that this side of Utopia *we’re all ‘disabled’ to some extent* – by any one of countless circumstances – parental income, biases, education, health, sibling position, our peers, loneliness, personality etc etc (x 1,000 variables).

**Good governance requires promptly evaluating, incorporating feedback.** Our city is constantly changing, the many forces of change (from government, culture, expectations, media etc) are unpredictable and yet these Access and Inclusion policies are fixed until the next review.

Sure builders, developers, property owners need certainty but there must be a happy medium for complaints, experience, regular commentary, new learnings to be scooped up, evaluated and seamlessly incorporated into these policies. All benefit. We know that Politicians ignore feedback at their peril. Policy technicians can be just as prescient (if the system demands it!)

I cannot give administrative advice on a system for updating these policies in real time – However, I recall the credo externally introduced to a then desperate third rate economy in 1952, Japan, that within a generation, took it to the world's highest per capita GDP - “Kaizen” – *a system of constant improvement* – from the ground floor to every level of management – The goal, which I suggest is equally valid for Council, is not to merely provide a *defined* fixed (high level) of services to the million, but to exceed these (within budgetary constraints), and to exceed again – i.e constant improvement. Of course this requires valid measurement and comparison of performance (see below on KPIs)

Once again, its worth the trouble. In a ruthlessly competitive world, good social policy (like constantly better Access & Inclusion) *pays for itself*.

**Good governance requires relevant monitoring of the right KPIs in the feedback.**

“Motherhood” statements as line-item goals for this Council in Social Policy are theft. They distract and then steal effort.

The policies already refer to in passing (but don't commit to monitor/compare) financial KPIs – visitor numbers, amount spent by them etc. There are potentially others – e.g. detailed qualitative surveys (refer the pro-active interviews, listening advice noted above). Following up precise data on complaints and their resolution is one of many other KPIs. I note that the Productivity Commission's methodology in its ‘social policy’ Inquiries (including the 2011 Report that became the foundation for the NDIS) points the

way. Those economic hard heads are adept at not only pointing to the absence of clothes on the Emperor but through astute data and comparisons examining the skin lesions *and how to fix them*.

Obviously, in monitoring the working of these Policies, there must be comparisons over time and with similar cities.....

**Best Practise for Council includes investigating what leading cities elsewhere are doing.**

What are the successful lessons for Access & Inclusion from Melbourne, London, New York, Paris, Berlin etc etc?

It's a complex area, expensive in research resources. We owe it to our rate-payers and the million mandate that we should not try to start from scratch, every four years to re-invent the wheel.

This is not a validation of expensive Council sponsored junkets. In this digital age, liaison overseas does not require boots there.

Regrettably, in the Policies about to be approved, I don't see any attempt *to learn* from the street level experience of others – or to monitor how well or not, we're doing by comparison