

Submission

To	South Australian Police – Diversity and Inclusion Branch
Topic	Disability Access and Inclusion Plan 2025-2029.
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Contact

E advocacy@unitingcommunities.org

P 08 8202 5111

About

We are an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities.

We support those in need to find the courage to move forward through enriching their lives and uniting the communities in which they live. By tackling the deep-seated challenges that affect people's lives, we are working to create systemic change and brighter futures for all South Australians.

Uniting Communities has extensive experience supporting people with a disability across a wide range of needs. Through programs such as:

[NDIS Support Services](#)

Uniting Communities offers personalised NDIS support through one-to-one services that help individuals build independence, engage with their community, and achieve personal goals. Support workers assist with daily living, social participation, and skill development, tailoring services to each person's unique needs and preferences.

[Individualised Living Options Service](#)

Uniting Communities' Individualised Living Service provides tailored support for people with disability to live independently in their own homes. The service is designed around each person's goals, preferences, and lifestyle, offering flexible assistance with daily routines, decision-making, and community engagement. It promotes autonomy and wellbeing through respectful, person-centred care.

[Law Centre](#)

Uniting Communities Law Centre provides free legal help to people experiencing disadvantage across South Australia. We understand that dealing with the legal system can be confusing and daunting and staff in the [Uniting Communities Law Centre](#) assist people to work through these challenges. The qualified team provides support with information, advice, representation, referrals, and community legal education.

[Disability Advocacy Service](#)

Uniting Communities' Disability Advocacy Service provides free, independent support to help people with disability understand and assert their rights. The service assists with NDIS-related issues, and access to essential supports, offering legal advice, advocacy, and referrals.

Submission to SAPOL Disability Access and Inclusion Plan

Uniting Communities thanks the South Australian Police (SAPOL) for consulting on their Disability Access and Inclusion Plan. We commend the department for being committed to addressing challenges and embedding inclusive practices into everyday policing. We believe that the most pressing issue in relation to disability accessibility and inclusion is for victims, witnesses and suspects with complex communication needs (CCNs), who are overrepresented in the justice system. We expect that access is provided in the form of wheelchairs and ramps for people with physical disabilities. Equally, communication access is required for people who experience difficulty speaking, understanding, reading and/or writing.

People with CCNs face a range of challenges when interacting with the justice system including issues reporting crime from a lack of access to communication supports. There are two key phases to improving communication access: first, strengthening education and support across frontline services (including accreditation); second, integrating the expertise of Communication Partners (CPs) into police processes such as interviews, where appropriate.

The report [*Enabling Autonomy and Access*](#), from the Disability Royal Commission, explored how communication barriers affect people's ability to navigate systems like justice. It emphasised the importance of inclusive communication practices to reduce systemic exclusion.

Our key recommendations

SAPOL's plan includes:

- **A commitment to becoming Communication Access Accredited.**
- **A commitment to improving communication access across police stations and frontline service personnel including through better education and training (including for police prosecutors).**
- **A commitment to fund and work alongside dedicated communication partners. We recommend the Communication Partner Service is reintroduced to work alongside SAPOL to support victims, witnesses and suspects with CCNs.**
- **Improving the readability of documentation by using plain English and explaining legal terms—in addition to Easy English resources.**
- **Enhancing its screening procedures during arrests by including targeted questions to identify disability-related needs and ensure appropriate support is provided.**
- **Expanding mental health first aid training for frontline staff and increase access to specialist clinicians beyond mental health specific callouts.**
- **Reviewing their response to elder abuse to ensure disability and inclusion considerations are embedded in practice, supporting better outcomes for older people.**
- **Expanding the availability of Auslan interpreters to better support people with hearing impairments.**
- **Reporting outcomes from the previous Disability Access and Inclusion Plan and commits to providing annual updates on progress toward implementing the next plan's actions.**

Additional Comments

Communication Access

Communication partners

SAPOL can have the greatest impact on accessibility and inclusion by enhancing support for people with complex communication needs (CCN). People with CCNs are particularly vulnerable in the justice sector. Research indicates that Aboriginal offenders are more likely to have CCNs, including cognitive impairment or mental illness, than non-Aboriginal offenders.¹ Additionally, research finds that fifty to sixty percent of male young offenders have a clinically significant language disorder.²

There is a gap in specialist Communication Partner (CP) support for victims, witnesses and suspects with CCNs when engaging with SAPOL. Communication Partners (CPs), someone who supports and facilitates effective interaction with individuals who have communication difficulties, are not readily accessible or are very costly. Without appropriate support, people with CCNs may misunderstand what they're being asked, leading to unreliable statements or unnecessary escalation.

Uniting Communities helped address this gap previously through our Communication Partner's (CPs) Service which ran from 1 July 2016 until 30th February 2020. The service provided around 20 highly qualified, well trained independent volunteer CPs, including speech pathologists and psychologists all trained in justice system processes and communication with people with CCNs. CPs facilitated the effective communication of children and adults with CCNs in the giving of evidence in police interviews and court proceedings. The service was available to victims, witnesses, suspects and defendants. The disabilities that clients had included Autism Spectrum Disorder, Intellectual Disability and Acquired Brain Injury. This tailored communication support improved the quality and accuracy of evidence from clients.

As part of this service, we facilitated training with SAPOL including resources officers could use to detect people with CCNs and identify when support from a CP was required. Regrettably, the service was subsequently defunded by the previous Marshall Liberal Government. While the service was active, SAPOL gave positive feedback, and there appeared to be ongoing need and interest in continuing it.

One SAPOL officer shared; *"Victim Management Section (VMS) welcome and genuinely value the wealth of experience the Communication Partners brings to the process. Their professional skills have been helpful in identifying and providing the additional assistance and supports these vulnerable witnesses need in order to give a reliable and comprehensive account of their evidence in an inclusive and respective environment setting."*

As highlighted by South Australian Legal Reform Institute's (SALRI) research, it is unrealistic to expect already time-poor police officers to become experts in the communication needs of the wide variety of vulnerable witnesses and complex communication needs which may be encountered in the criminal justice sector.³ Uniting Communities is of the firm belief that without Communication Partner support, the South Australian justice system, including SAPOL, is falling behind other jurisdictions in its capacity to provide access to justice for victims, witnesses, suspects and defendants with communication disabilities.

¹ South Australian Law Reform Institute, Providing a Voice to the Vulnerable: A Study of Communication Assistance in South Australia, 2021, P. 36.

² Swain, N, University of Melbourne, Speech-language pathology intervention for young offenders, 2016.

³ South Australian Law Reform Institute, Providing a Voice to the Vulnerable: A Study of Communication Assistance in South Australia, 2021, P. 130.

Communication Access Accreditation

SAPOL can improve communication access for people with CCNs, by becoming Communication Access Accredited through organisations like [Scope](#), Australia. Uniting Communities' UCity building is accredited by Two Way Street (who works on behalf of Scope), the only approved communication access assessor in South Australia, we continue to expand accessible communication training and tools across our sites.

Accreditation helps teams have the skills and confidence to improve communication with people with CCNs. It also involves the production of bespoke communication tools, including Easy English guides to facilitate access and understanding of services and support.

This accreditation recognises the unique challenges faced by people with CCNs and would ensure that SAPOL staff are trained and have communication resources to support this cohort to provide reliable evidence. In Victoria a number of police stations are communication partner accredited, including [Box Hill Police Station](#) which became the first in Australia to earn the Communication Access Symbol after a two-year training program by Scope, equipping its entire team to support people with communication difficulties.

It is our understanding that SA Ambulance have introduced communication access practices, by implementing training programs like [Best Care from Scope Australia](#), and by using tools such as easy-read resources and portable hearing loops. Their most recent disability access and inclusion plan included initiatives like facilitating easy English information.

Training

Training is essential for both recognising and effectively communicating with people who have CCNs, as this is often a hidden disability. Without appropriate communication, individuals may not fully understand their rights and may agree to things they don't comprehend. While frontline SAPOL staff aren't expected to become experts in communication accessibility, training can enhance practices, improve interactions, and help identify when additional support, such as from CPs, is needed. Although formal training and accreditation is really important, CPs bring specialised expertise that can significantly assist in police interviews and other interactions where needed. Their involvement can profoundly improve outcomes for people with CCNs and strengthen SAPOL's processes.

Enhancing Readability of SAPOL Documents

Often SAPOL documentation including notices and other procedural documents are not understandable for many people that may have language difficulties or simply are not familiar with certain legal processes and terminology. At times, we have observed client difficulties understanding SAPOL documentation as it was unclear and arguably required some form of legal training to understand. As a result, we recommend SAPOL investigate ways to improve the readability and accessibility of their materials by using plain English and clearly explaining legal terms to ensure universal accessibility – this is distinct from the need for Easy English resources for people with CCNs.

Screening process

We recommend that SAPOL improves its current screening procedures by incorporating additional questions and information gathering to help officers accurately identify individuals with disabilities during arrests. This can include additional questions regarding whether someone has a disability, has a known mental health condition, whether they can read, normally require a support worker, or need essential medication—and ensuring that such support is provided. It's also important to assess whether extra time is needed to accommodate communication or processing needs, to avoid missing critical information or having to repeat steps later.

Mental health first aid training

We recommend that as a part of disability and inclusion training, further mental health first aid training is implemented for SAPOL frontline service staff. This includes training in understanding the complexities associated with severe mental health challenges, including psychosis, so the right setting and support can be provided to improve outcomes.

We are pleased to see South Australia's [Mental Health Co-Responder Program expanded](#) which pairs mental health clinicians with police officers to respond to Triple Zero mental health calls. It is our hope that the accessibility of this support would extend to other cases, beyond specific mental health call outs to ensure these clinicians are accessible to SAPOL officers where this specialist mental health support may be required including for victims, suspects, and witnesses.

Elder Abuse

Elder abuse often intersects with disability-related factors such as cognitive decline, mental health conditions, CCNs, or other impairments affecting both the perpetrator and the older person. In light of SAPOL's Disability Access and Inclusion Plan, it is timely to review current responses to elder abuse to ensure these factors are appropriately recognised and addressed. Our experience in the Elder Abuse Unit suggests SAPOL's involvement in Elder Abuse matters is often limited, with cases, such as trespass (where the abuser is refusing to leave), being classified as civil matters. Embedding disability and inclusion considerations into SAPOL's approach could lead to more effective interventions and improved outcomes for older people.

Conclusion

We appreciate the opportunity to contribute to SAPOL's Disability Access and Inclusion Plan, which presents a vital opportunity to strengthen support for people with complex communication needs. By introducing Communication Partners (such as the Communication Partner Service), investing in targeted training, and pursuing Communication Access Accreditation, SAPOL can take meaningful steps toward improving access, inclusion, and equitable engagement across its services.