

DISABILITY INCLUSION ACTION PLAN

2017/18 - 2020/21

April 2017





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Rous would like to thank Daisi, RED Inc and the Lismore Access Committee for their contribution to the development of this Plan.

Executive summary

For the first time, all government agencies in New South Wales are working towards a common goal to improve the lives of persons with a disability, support persons and family members.

The advantages to inclusion are numerous, and extend far beyond the legislative requirements in place. Inclusion enhances diversity, provides socio-economic advantages (in the form of health, education and employment), community morale, varied viewpoints and individual perspectives, and many other important factors.¹

Rous County Council ('Rous') is excited to work towards this goal and to present its first Disability Inclusion

Action Plan (the 'Plan'). This Plan is an important factor in Rous working towards its mission 'to thrive and evolve as a valued regional service provider.'

As a regional service provider, Rous plays a key part in supporting the community through recognising and removing barriers to access and inclusion wherever possible. With 5.4% of individuals in the region identifying that they need assistance with core activities² and an ageing population³, there is no better time to be making plans and delivering change to improve access to Rous' services and facilities.

Rous' Plan has been developed over the last twelve months through various types of consultation (including participation from staff and community groups), site audits (performed by an access consultant), information gathering and research. The Plan will be reported on to Council at least six monthly, and will be renewed every four years.



'As a community,
we are poorer
without a
diverse range
of viewpoints
and individual
perspectives.'

*NSW Department of Family and
Community Services and Local
Government NSW, Disability
and Inclusion Action Planning
Guidelines (2015).*

¹ NSW Department of Family and Community Services and Local Government NSW, Disability Inclusion Action Planning Guidelines (2015).

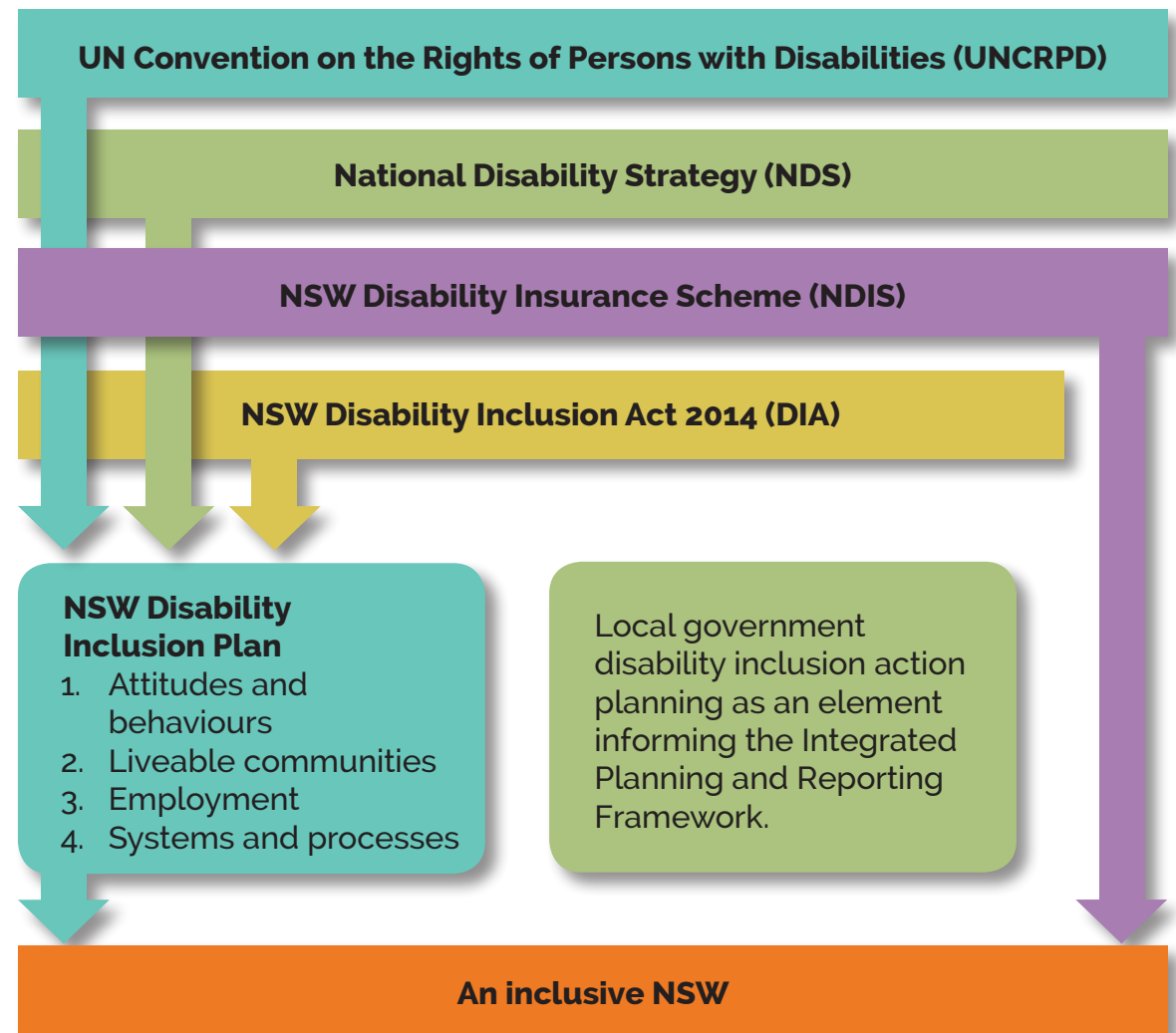
² Australian Bureau of Statistics, 2011, 'Ballina (A) LGA, People'; Australian Bureau of Statistics, 2011, 'Byron (A) LGA, People'; Australian Bureau of Statistics, 2011, 'Lismore (C) LGA, People'; Australian Bureau of Statistics, 2011, 'Richmond Valley (A) LGA, People'.

³ Regional Development Australia, Northern Rivers Profile, (2013).

Background and context

There is an ongoing commitment by all government agencies to support increased inclusion and access. This has been reflected through the various policy and legislative instruments developed (at an international level to a local level) which provide that it is unlawful to discriminate against persons with a disability. The goal of the policy and legislative framework (demonstrated in Figure 1 right) is to make a more inclusive environment for everybody.

Figure 1 - Relationships between policy and legislative instruments⁴



⁴NSW Department of Family and Community Services and Local Government NSW, Disability Inclusion Action Planning Guidelines (2015).

UN Convention on the Rights of Persons with Disabilities

Australia ratified the UN Convention on the Rights of Persons with Disabilities in 2008. This Convention seeks to ensure that individuals with disabilities have the same access to services as those without disability.

National Disability Strategy

The National Disability Strategy has been developed in partnership by the Commonwealth, State, Territory and local governments and supports the commitments made under the UN Convention on the Rights of Persons with Disabilities.⁵ The actions developed in the strategy have been incorporated into the Disability Inclusion Act 2014 (NSW) and the NSW Disability Inclusion Plan.⁶

National Disability Insurance Scheme

The National Disability Insurance Scheme is a system designed to support people with a disability to seek services specific to their wants and needs, with funding being allocated to individuals rather than service providers. It is expected to be implemented in New South Wales by 2018.⁷

Disability Inclusion Act 2014 (NSW)

Rous is guided by the Disability Inclusion Act 2014 ('the Act'). The Act defines disability as:

'a long-term physical, psychiatric, intellectual or sensory impairment that, in interaction with various barriers, may hinder the person's full and effective participation in the community and on an equal basis with others.'⁸

The Act includes, among other things, a requirement by all New South Wales state government agencies and local government agencies to prepare a Disability Inclusion Action Plan (this Plan). For local government, Disability Inclusion Action Plans are required to be in place by 1 July 2017.⁹

^{5, 6, 7} NSW Department of Family and Community Services and Local Government NSW, Disability Inclusion Action Planning Guidelines (2015).

⁸ Disability Inclusion Act 2014 (NSW) s 7.

⁹ Disability Inclusion Regulation 2014 (NSW) cl. 7.



'...to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.

UN Convention on the Rights of Persons with Disabilities, Article 1.

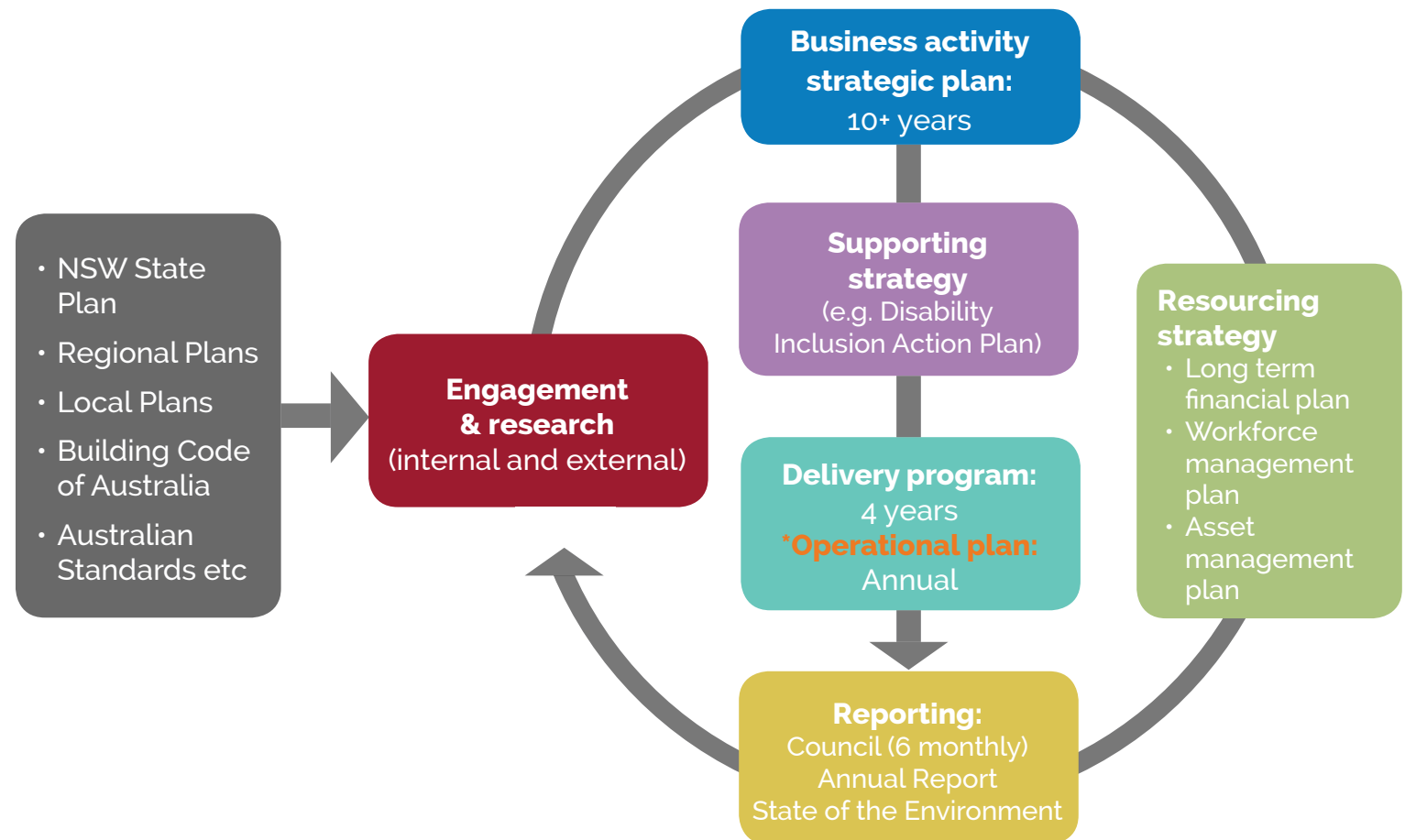
Integrated Planning and Reporting Framework

The Integrated Planning and Reporting framework ('IP&R') is a requirement for local government. The framework is a 'corporate plan' for councils and its aim is to:

- streamline statutory reporting
- strengthen Rous' strategic focus
- provide accountability to the local community.

Rous' Plan, while a standalone document, compliments and informs the IP&R framework. All of the actions you see in this Plan will be incorporated into the annual **Operational plan***

Figure 2 - Council's IP&R framework



Our Council and our region

Rous is a county council constituted under the Local Government Act 1993. County councils are different to local councils as they are specifically set up or delegated to provide one or more functions of a local council. As a county council, Rous provides bulk water supply, weed biosecurity and flood mitigation services directly to the areas of:

- Ballina Shire Council
- Byron Shire Council
- Lismore City Council
- Richmond Valley Council.

Within this footprint, Rous owns and operates 8 sites and various assets, including:

- 3 publicly accessible sites
- 2 water treatment plants
- 2 dams.

The Department of Planning and Environment predicts that the NSW population will grow by 2.71 million by 2036. This includes an increase in the region of 16,750 people.¹²

As this area is a growing regional hub, Rous anticipates that its sites and services will be used more frequently. In particular, Rous expects that there will be an increase in:

- visitation rates to Rocky Creek Dam; and
- traffic flow on its website.

¹² Department of Planning and Environment, Population projections (2016) <<http://www.planning.nsw.gov.au/projections>>

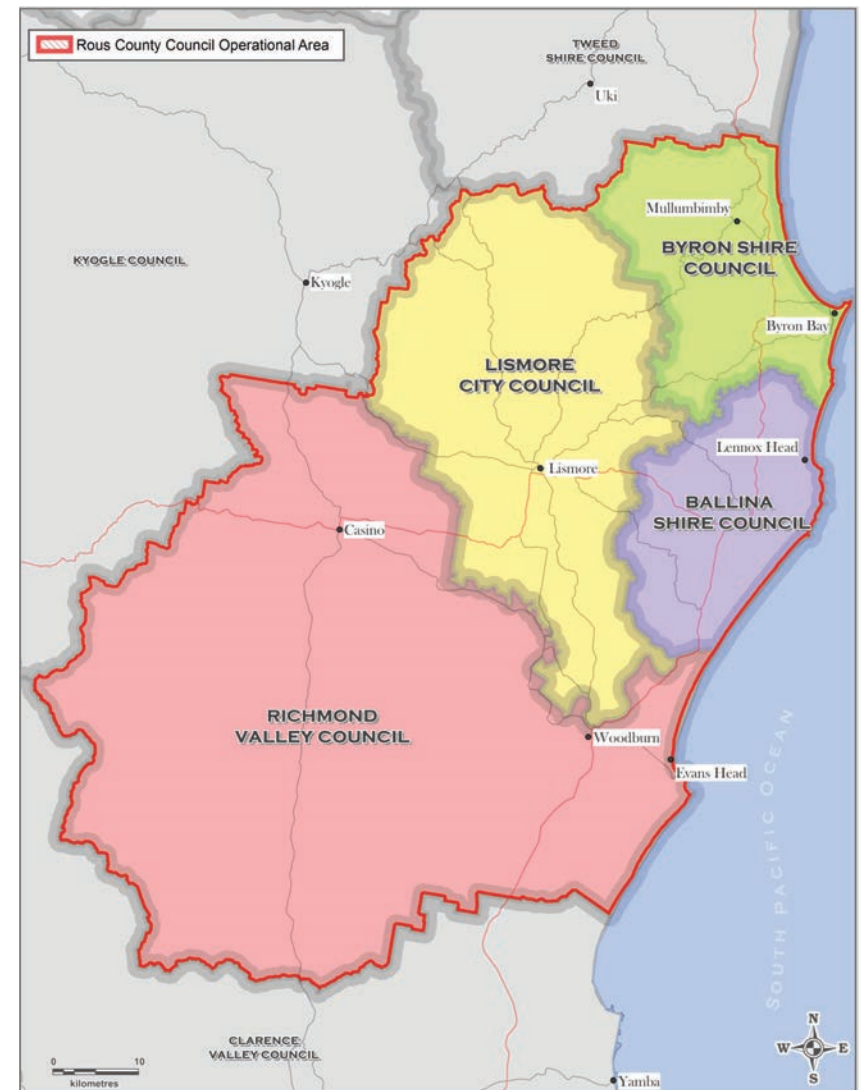


Figure 3 - Rous' operational footprint

Table 1 - Regional snapshot of accessibility¹³

	Rous County Council	Our constituent Councils			
		Ballina Shire Council	Byron Shire Council	Lismore City Council	Richmond Valley Council
Land size:	5,323 km²	484.7 km ²	565.8 km ²	1,287.8 km ²	3,047.4 km ²
Total population:	141,375	41,644	32,119	44,629	22,983
Population requiring assistance with 'core activities':	5.4%	5.8%	4.5%	5.7%	7.3%
Population providing carer assistance:	10.0%	13.2%	11.8%	13.2%	14.3%
Population over 70 years of age:	11.5%	15.7%	9.9%	10.3%	13.9%
Population 4 years of age or below:	5.6%	5.4%	5.6%	6.1%	6.7%

¹³ This information has been collected through various sources, such as the Australian Bureau of Statistics (2011 Census), profile id, Office of Local Government and each constituent council's websites.



What do these figures tell us?









Due to the increase in individuals requiring assistance, our ageing population and the expected increase in population over the next 14 years, accessibility is an important factor in Rous' planning and decision making.



What does 'core activities' mean?

The ABS defines the three core activities as self-care, mobility and communication.

Developing the plan

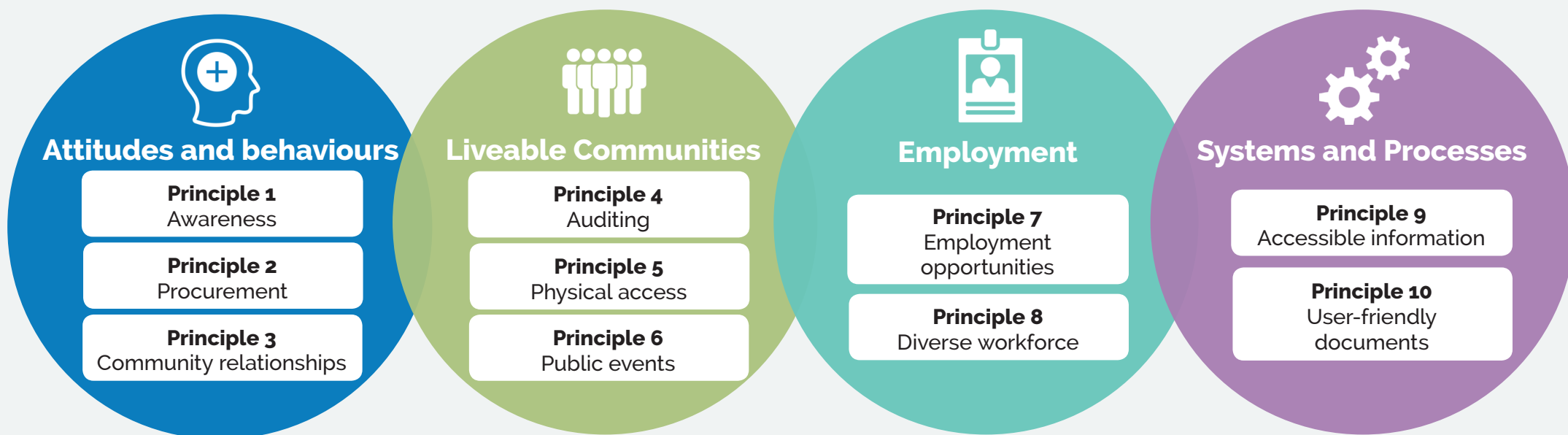
 Endorsement	<p>Senior management were briefed on Rous' obligations under the Disability Inclusion Act 2014, and provided an action plan to outline the project.</p>
 Research	<p>A variety of research was undertaken, including:</p> <ul style="list-style-type: none"> • Identifying all requirements for Rous' Plan • Meetings with senior staff to identify barriers and opportunities to improve inclusion.
 Auditing	<p>An access consultant was engaged to provide a report on opportunities to improve physical access to, and use of all Rous sites.</p>
 Collating the information	<p>The information received was collated and developed into the draft Plan.</p>
 Consultation	<ul style="list-style-type: none"> • Public consultation (copy on website, hard copies in Rous' Administration Centre reception, advertisement in The Northern Star newspaper). • Targeted public consultation with disability employment providers, disability support groups.
 Collating feedback	<p>Feedback received was collected, considered and adjustments to the draft Plan made.</p>
 Council adoption	<p>21 June 2017.</p>
 Lodgement	<p>With the Disability Council of NSW and the Australian Human Rights Commission.</p>

Disability Inclusion Action Plan objectives

Rous has developed ten principles to enhance access and inclusion for members of the public and staff. These principles have been designed giving consideration to:

- consultation
- the accessibility reports developed by an access consultant
- strategic goals in Rous' Integrated Planning and Reporting framework, Workforce management plan, Long-term financial plan and asset management plan.

Figure 4 - Ten principles of Rous' Disability Inclusion Action Plan



The importance for including these principles in Rous' Plan, and how Rous proposes to improve access in these areas is outlined as follows on pages 11-14.



Why is this important?

People with a disability have described general attitudes and behaviours as the single greatest barrier to full access and inclusion in society.¹¹ As a regional service provider, it is important that all members of the public who interact with Rous have a positive experience.

Principle 1: Awareness

Rous will seek to raise accessibility awareness by:

- Reviewing staff induction practices.
- Increased staff training in access and equity.
- Promoting this Disability Inclusion Action Plan in the community.

Principle 2: Procurement

Rous will review its practices to establish procurement channels through local disability employment providers. Specifically, this will involve:

- Identifying local disability employment providers.
- Reviewing policy and procedure related to Rous' procurement practices to increase opportunities to work with disability employment providers.

Principle 3: Community relationships

Rous wants to invest time in its relationship with the community to make this Plan, and its outcomes as effective as they can be. To do this, Rous will:

- Establish relationships with disability support groups.
- Promote Rous events that are accessible and inclusive to the community.

¹¹ NSW Department of Family and Community Services and Local Government NSW, Disability Inclusion Action Planning Guidelines (2015), page 12.



Why is this important?

All persons are entitled to equal access and enjoyment to services and facilities in the community. This principle is founded on the concept of 'universal design'.

Principle 4: Auditing

Using existing accessibility data, Rous will undertake two reviews, or 'audits' that will be conducted in year 1 of the Plan:

- **Priorities from accessibility reports**

A project team will be established to prioritise important actions and assign timeframes for completion. The agreed priorities for each financial year will be incorporated into Rous' Operational plan.

- **Signage**

An audit will be conducted to identify what signs are required and where and how they need to be installed.

Principle 5: Physical access

Improve physical access by:

- Modifications to the Level 2 and 4 foyers at the Administration Centre, Lismore.
- Seeking grant funding for accessible playground equipment at Rocky Creek Dam as opportunities are made available.

As outlined in principle 4, other physical improvements will be identified in the first year and actions incorporated into the respective Operational plan.

Principle 6: Public events

Rous will review its practices to ensure that preference is given to accessible venues and take into account principles of equity and inclusion so that everybody has the ability to participate in public events. Rous hosts a variety of public events, from 'Big Scrub Day', to field days and other information and community sessions.



Why is this important?

Employment contributes to 'feelings of self-worth, social interaction and mental health and increases opportunities to support individual choice and control.'¹² For employers, diversity in the workforce promotes varied points of view and is generally acknowledged as being good business practice.¹³

Principle 7: Employment opportunities

To support achievement of this principle, Rous will:

- Review its recruitment documentation to better assist those with access requirements apply for positions at Rous.
- Recognise employment of persons with a disability in Rous' Employee Value Proposition.

Principle 8: Diverse workforce

Through fulfilling the actions under principle 7, Rous aims to build the diversity of its workforce. The way to measure this is by undertaking a staff survey. This will determine baseline data relating to staff diversity and attitudes, as well as feedback to inform the development of the next Disability Inclusion Action Plan.

¹² NSW Department of Family and Community Services and Local Government NSW, Disability Inclusion Action Planning Guidelines (2015), page 14.

¹³ Department of Social Services, 'Employing people with a disability information sheet' (2016) <<https://www.jobaccess.gov.au/downloads/employing-people-with-disability>>



Why is this important?

It is important that everyone has the opportunity to interact with Rous. In this regard, Rous will review how it and members of the public can effectively communicate with each other.

Principle 9: Accessible information

Rous wants members of the public to be able to effectively navigate its website and communicate with its people. To do this, the right systems need to be in place. Rous will:

- Research additional communication methods for interactions between Rous and members of the public (such as the National Relay Service).
- Maintain a website compliance rating of 'AA'.

Principle 10: User-friendly documents

Many of Rous' documents explain key business processes, and how members of the public can interact with us. To ensure that Rous has the right processes in place for members of the public and its staff, Rous will:

- Review its Customer service charter.
- Review its 'Feedback' policy, procedure and related documents.
- Review all external forms to ensure that they are practical and user-friendly.

Monitoring, reporting and evaluation

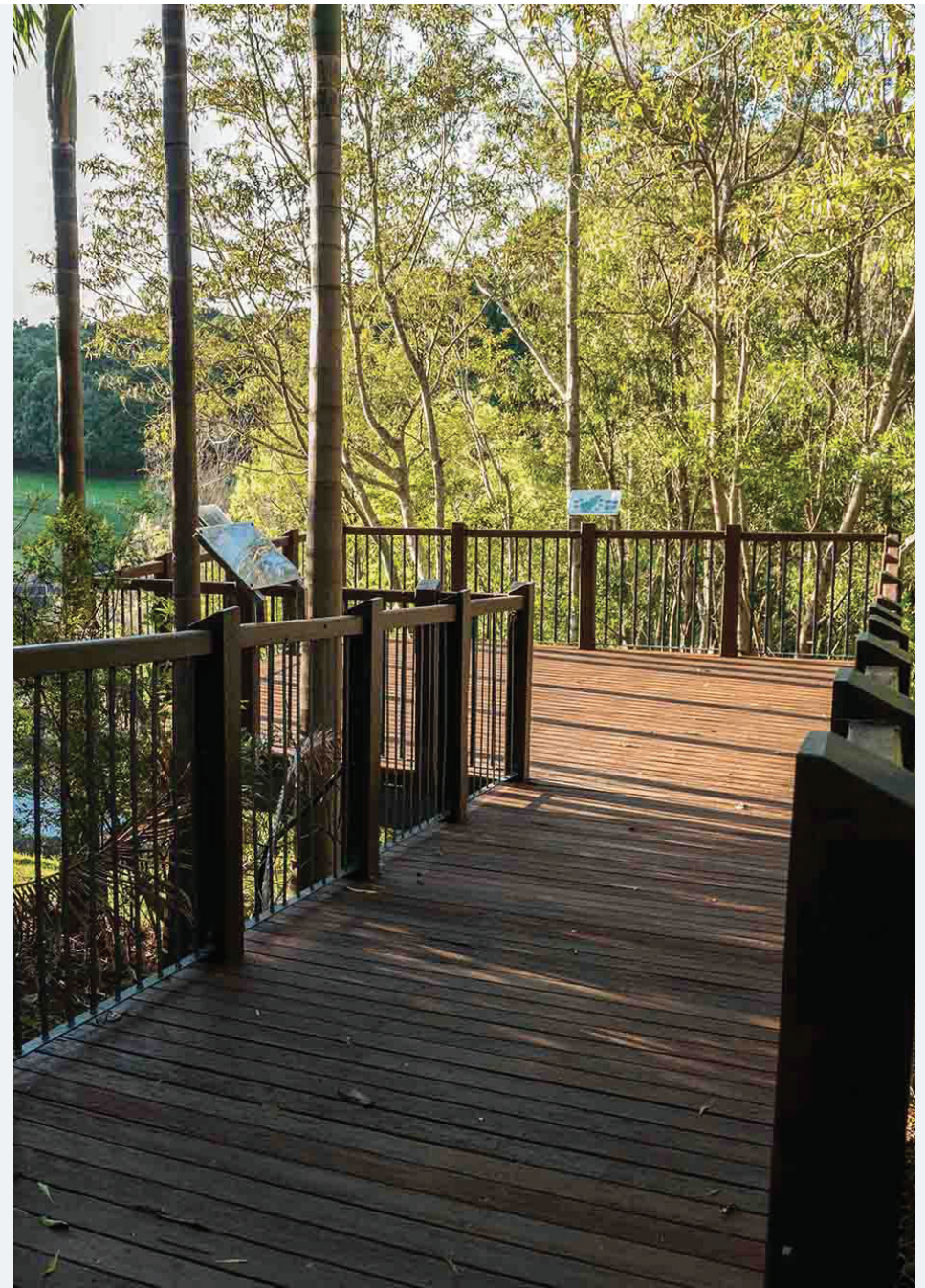
Rous' achievements to improve access and inclusion for members of the public and staff will be measured against the 'Strategic plan' (pages 17-18) and the 'Timeframes' (page 19-21).

Performance will be measured and reported in the following ways:

- Internally (to the General Manager and senior management): at least six-monthly.
- Council: at least six-monthly (this is publicly available in Rous' business papers on our website at www.rous.nsw.gov.au).
- Office of Local Government: annually via Rous' Annual Report (this is publicly available on our website at www.rous.nsw.gov.au).
- Minister for Disability Services: annually.¹⁴

Rous will seek feedback from members of the community and staff to evaluate the effectiveness of the Plan and to inform the development of its next Plan.


¹⁴ Disability Inclusion Act 2014 (NSW) ss 13(1), (3).





Disability Inclusion Action Plan - Strategic plan

DIAP focus area	Strategy What are the strategies for the DIAP?	Action What are the actions that Rous will take to deliver the strategies?	Measures What does success look like?	Responsibility Who is responsible for delivering the action?	IP&R reference Where does the action fit in Rous' IP&R framework?
ATTITUDES AND BEHAVIOURS 	1. Awareness.	1.1 Review staff induction process to include access awareness.	<ul style="list-style-type: none"> All new staff inducted in Rous' Disability Inclusion Action Plan, and how it relates to them and the community. 	Human Resources Coordinator.	Workforce Management Plan.
		1.2 Staff training in access awareness.	<ul style="list-style-type: none"> Identified access awareness training needs within Rous. Identified preferred training provider and method. Access awareness training integrated in 2019/20 Training Plan. 		
		1.3 Promote Rous' Disability Inclusion Action Plan in local community.	<ul style="list-style-type: none"> Disability Inclusion Action Plan promoted on Rous' website. 	Manager Governance and Human Services.	Delivery Program 2017/18 - 2020/21 (goal 2.4.3).
	2. Procurement.	2.1 Develop listing of local disability employment providers.	<ul style="list-style-type: none"> List of local disability employment providers developed by 30 December 2017 and incorporated into procurement practices. 	Manager Governance and Human Services.	Delivery Program 2017/18 - 2020/21 (goal 2.4.3).
		2.2 Review 'Procurement' and 'Tenders' policies and procedures to include opportunities to work with disability employment providers.			Delivery Program 2017/18 - 2020/21 (goal 6.1.8).
	3. Community relationships.	3.1 Establish relationships with local disability support groups.	<ul style="list-style-type: none"> Targeted consultation pathways in place to inform future decision making. 	Manager Governance and Human Services.	Delivery Program 2017/18 - 2020/21 (goal 2.4.3).
		3.2 Promote Rous services and events that are inclusive/accessible.	<ul style="list-style-type: none"> Services and events promoted on Rous' website. 	Manager Planning and Delivery.	

Disability Inclusion Action Plan - Strategic plan (continued)

DIAP focus area	Strategy What are the strategies for the DIAP?	Action What are the actions that Rous will take to deliver the strategies?	Measures What does success look like?	Responsibility Who is responsible for delivering the action?	IP&R reference Where does the action fit in Rous' IP&R framework?
LIVEABLE COMMUNITIES 	4. Auditing.	4.1 Establish a project team to assess accessibility reports relating to Rous sites, determine priorities and resourcing for years 2-4.	<ul style="list-style-type: none"> Project plan developed; priorities determined; budget allocations provided to Finance by 30 March 2018. Priorities incorporated into annual Operational plan. 	Manager Planning and Delivery / Manager Governance and Human Services.	Delivery Program 2017/18 – 2020/21 (goal 2.4.3).
		4.2 Conduct audit of Rous sites to review signage requirements.	<ul style="list-style-type: none"> Required signs across all of Rous' sites identified by 30 September 2017. 	Work Health and Safety Officer / Governance Officer.	
		4.3 Purchase and install signs as a result of signage audit.	<ul style="list-style-type: none"> Signs purchased and installed by 30 March 2018. Signs meet requirements of Access to Premises Standards D4.3 (where braille sign is required). Signs installed in accordance with Access to Premises Standards D4.2 (where sign is braille sign). 	Work Health and Safety Officer / Purchasing/Fleet Officer.	
	5. Physical access.	5.1 Administration Centre – Level 2 foyer upgrade.	<ul style="list-style-type: none"> Level 2 foyer upgraded in accordance with relevant accessibility building codes and standards (including Building Code of Australia, Australian Standard 1428.1) 	Manager Corporate and Commercial.	Delivery Program 2017/18 – 2020/21 (goal 2.4.3).
		5.2 Administration Centre – Level 4 foyer upgrade.	<ul style="list-style-type: none"> Level 4 foyer upgraded in accordance with relevant accessibility building codes and standards (including Building Code of Australia, Australian Standard 1428.1, Access to Premises Standards). 		
		5.3 Rocky Creek Dam – apply for grant funding as opportunities are made available (install accessible playground equipment).	<ul style="list-style-type: none"> Grant funding opportunities identified and applied for. 	Manager Planning and Delivery.	
	6. Public events.	6.1 Review event management documents / practices.	<ul style="list-style-type: none"> Event management practices reviewed by 30 December 2018. 	Manager Governance and Human Services / Manager Planning and Delivery.	Delivery Program 2017/18 – 2020/21 (goal 2.4.3).

Disability Inclusion Action Plan - Strategic plan (continued)

DIAP focus area	Strategy What are the strategies for the DIAP?	Action What are the actions that Rous will take to deliver the strategies?	Measures What does success look like?	Responsibility Who is responsible for delivering the action?	IP&R reference Where does the action fit in Rous' IP&R framework?
EMPLOYMENT 	7. Employment opportunities.	7.1 Inclusion of accessibility requirements in 'Recruitment' procedure and related documents.	• 'Recruitment' procedure and related documents developed and implemented by 30 June 2018.	Human Resources Coordinator.	Workforce Management Plan.
		7.2 Recognise employment of persons with a disability in Rous' Employee Value Proposition.	• Employee Value Proposition developed by 31 December 2017.		
	8. Diverse workforce.	8.1 Develop and undertake staff survey to assess Rous' diversity, attitudes, success of current Disability Inclusion Action Plan and recommendations for next Plan.	• Staff survey developed and conducted by 30 September 2020. • Baseline data relating to staff attitudes and access requirements collected.	Human Resources Coordinator.	Workforce Management Plan.
		8.2 Staff survey to inform the development of next Disability Inclusion Action Plan.	• Next Disability Inclusion Action Plan developed by 30 March 2021.	Manager Governance and Human Services.	
SYSTEMS AND PROCESSES 	9. Accessible information.	9.1 Research additional customer communication options (eg. National Relay Service).	• More communication options available to members of the public.	Manager Corporate and Commercial.	Delivery Program 2017/18 – 2020/21 (goal 2.4.3).
		9.2 Review website to ensure WCAG 2.0 AA compliance.	• Website compliance rating of 'AA' maintained.	Senior IT Network Engineer.	
	10. User-friendly documents.	10.1 Review Customer service charter.	• New Customer service charter developed by 30 June 2018.	Manager Governance and Human Services.	Delivery Program 2017/18 – 2020/21 (goal 2.4.3).
		10.2 Review 'Feedback' policy, procedure and other related documents.	• Feedback policy, procedure and related documents revised, developed (where appropriate) and implemented by 30 June 2018.		
		10.3 Review external forms.	• All external forms to be formatted in editable PDF and developed in consultation with disability support groups. • Project to be completed by 30 June 2020.	Manager Corporate and Commercial.	

Disability Inclusion Action Plan - Timeframes

Strategy	Action	On going	Q1 2017 by 30/9/17	Q2 2017 by 31/12/17	Q3 2017 by 31/3/18	Q4 2017 by 30/6/18	Q1 2018 by 30/9/18	Q2 2018 by 31/12/18	Q3 2018 by 31/3/19	Q4 2018 by 30/6/19	Q1 2019 by 30/9/19	Q2 2019 by 31/12/19	Q3 2019 by 31/3/20	Q4 2019 by 30/6/20	Q1 2020 by 30/9/20	Q2 2020 by 31/12/20	Q3 2020 by 31/3/21	Q4 2020 by 30/6/21
1. Awareness	1.1 Review staff induction process to include access awareness.																	
	1.2 Staff training in access awareness.																	
	1.3 Promote Rous' Disability Inclusion Action Plan in local community.																	
2. Procurement	2.1 Develop listing of local disability employment providers.																	
	2.2 Review 'Procurement' and 'Tenders' policies and procedures to include opportunities to work with disability employment providers.																	
3. Community relationships	3.1 Establish relationships with local disability support groups.																	
	3.2 Promote Rous services and events that are inclusive/ accessible.																	
4. Auditing	4.1 Establish a project team to assess accessibility reports relating to Rous sites, determine priorities and resourcing for years 2-4.																	
	4.2 Conduct audit of all Rous sites to review signage requirements.																	
	4.3 Purchase and install signs as a result of signage audit.																	

KEY:

Quick Win	Develop	Ongoing project (e.g. runs the whole 4 years)
Design	Implement Review	

Disability Inclusion Action Plan - Timeframes (continued)

Strategy	Action	On going	Q1 2017 by 30/9/17	Q2 2017 by 31/12/17	Q3 2017 by 31/3/18	Q4 2017 by 30/6/18	Q1 2018 by 30/9/18	Q2 2018 by 31/12/18	Q3 2018 by 31/3/19	Q4 2018 by 30/6/19	Q1 2019 by 30/9/19	Q2 2019 by 31/12/19	Q3 2019 by 31/3/20	Q4 2019 by 30/6/20	Q1 2020 by 30/9/20	Q2 2020 by 31/12/20	Q3 2020 by 31/3/21	Q4 2020 by 30/6/21
5. Physical access	5.1 Administration Centre – Level 2 foyer upgrade.																	
	5.2 Administration Centre – Level 4 foyer upgrade.																	
	5.3 Rocky Creek Dam – apply for grant funding as opportunities are made available (install accessible playground equipment).																	
6. Public events	6.1 Review event management documents / practices.																	
7. Employment Opportunities	7.1 Inclusion of accessibility requirements in 'Recruitment' procedure and related documents.																	
	7.2 Recognise employment of persons with a disability in Rous' Employee Value Proposition.																	
8. Diverse workforce	8.1 Develop and undertake staff survey to assess Rous' diversity, attitudes, success of current Disability Inclusion Action Plan and recommendations for next Plan.																	
	8.2 Staff survey to inform development of next Disability Inclusion Action Plan.																	
9. Accessible information	9.1 Research additional customer communication options (e.g. National Relay Service).																	
	9.2 Review website to ensure WCAG 2.0 AA compliance.																	

KEY:

Quick Win

Design

Develop

Implement | Review

Ongoing project

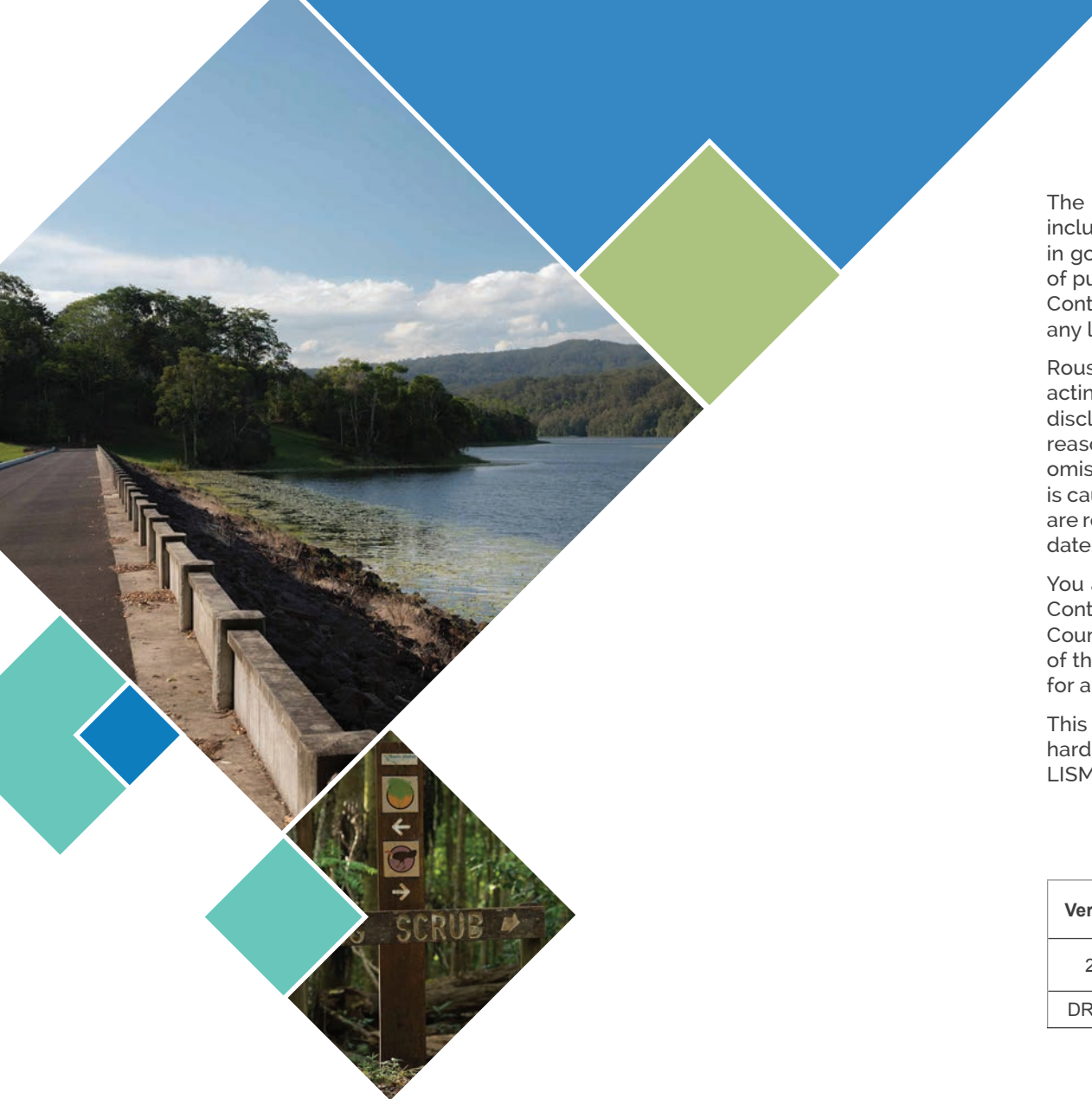
(e.g. runs the whole 4 years)

Disability Inclusion Action Plan - Timeframes (continued)

Strategy	Action	On going	Q1 2017 by 30/9/17	Q2 2017 by 31/12/17	Q3 2017 by 31/3/18	Q4 2017 by 30/6/18	Q1 2018 by 30/9/18	Q2 2018 by 31/12/18	Q3 2018 by 31/3/19	Q4 2018 by 30/6/19	Q1 2019 by 30/9/19	Q2 2019 by 31/12/19	Q3 2019 by 31/3/20	Q4 2019 by 30/6/20	Q1 2020 by 30/9/20	Q2 2020 by 31/12/20	Q3 2020 by 31/3/21	Q4 2020 by 30/6/21
10. User-friendly documents	10.1 Review Customer service charter.																	
	10.2 Review 'Feedback' policy, procedure and other related documents.																	
	10.3 Review external forms.																	

KEY:

Quick Win	Develop	Ongoing project (e.g. runs the whole 4 years)
Design	Implement Review	



The information contained in this Disability Inclusion Action Plan (the 'Plan') including opinions, advice and representations (the 'Content') has been formulated in good faith and with all due care, and is considered true and correct at the time of publication. Rous County Council ('Rous') does not warrant or represent that the Content is free from errors or omissions or that it is exhaustive. Rous does not accept any liability in relation to the quality or accuracy of the Content.

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This Plan is publicly available online at our website www.rous.nsw.gov.au or in hard copy from Rous' Administration Centre, Level 4 218-232 Molesworth Street, LISMORE, NSW, 2480 or by calling Rous on 02 6623 3800.

Version	Purpose and description	Date adopted by Council	Resolution no.
2.0	Endorsed at Cnl meeting 17 May 2017 for public consultation	DRAFT	DRAFT
DRAFT	Adoption of Plan	DRAFT	DRAFT