Disability Action Plan 2016-2019



# Foreword

I am pleased to present the Department’s *Disability Action Plan 2016–2019*.

The overarching theme of the plan is to cultivate a culture that embraces and celebrates a diverse workforce and removes barriers that prevent participation. This document details our agenda over the next three years and focuses on practical steps we can take to help us achieve a disability confident organisation—one that is underpinned by a culture of respect, acceptance and understanding. In creating an inclusive organisation, the Department will increase its capacity to employ, support and retain people with disability.

While the plan responds to requirements of the *Disability Discrimination Act 1992*, our approach goes beyond legislative compliance and aims to ensure equitable access to facilities and opportunities that support a productive and rewarding workplace for people with disability.

In my role as the Department’s Disability Sponsor, I am committed to ensuring there is engagement across the Department to support a culture of inclusiveness and mutual respect and to remove workplace barriers for people with disability.

While the Department has made progress in increasing our level of disability confidence, we have more work to do, consistent with the *APS As One Strategy*. We will continue our efforts to be an employer of choice for people with disability. This plan clearly articulates how we will achieve this and the ways we will measure our progress and success. Going forward, I’ll look forward to hearing from you on what more you think we can do to make our workplace as inclusive as possible.

**Dean Knudson**

Deputy Secretary

Diversity and Disability Sponsor

Contents

[Disability Sponsor’s Foreword 2](#_Toc426555727)

[1. Overview 4](#_Toc426555728)

[1.1. Creating a ‘disability confident’ organisation 4](#_Toc426555729)

[1.2. Our responsibilities 4](#_Toc426555730)

[1.3. SES leadership and central support 5](#_Toc426555731)

[1.4. Improving our support: *Disability Action Plan* *2016-19* 5](#_Toc426555732)

[1.5. Measuring progress and success 6](#_Toc426555733)

[2. Implementation Plan 8](#_Toc426555734)

[*2.1.* *Our workplace culture is inclusive and values the employment of people with disability* 8](#_Toc426555735)

[*2.2.* *We attract, employ, develop and retain people with disability* 10](#_Toc426555736)

[*2.3.* *Our premises and work environments are accessible to and supportive of people with disability* 11](#_Toc426555737)

[*2.4.* *Progress in achieving outcomes is monitored and reported* 13](#_Toc426555738)

[3. Relevant legislation and policy context 14](#_Toc426555739)

[4. Definitions 15](#_Toc426555740)

1. Overview
   1. Creating a ‘disability confident’ organisation

The *Disability Action Plan 2016-2019* is an integral part of the Department’s *Diversity Strategy 2013-17* and aims to create a ‘disability confident’ culture that supports inclusion and the removal of workplace barriers experienced by people with disability. An inclusive culture will enable the Department to become an employer of choice for people with disability and means that it is part of our every day operations to adjust processes and services to enable individuals to fully participate in the workplace.

The benefits for the Department in becoming a ‘disability confident’ organisation are that:

* People with disability bring different perspectives and a diverse range of skills and abilities to an organisation.
* Employees with disability have the same level of performance and productivity as other employees and take fewer scheduled absences and have increased tenure.[[1]](#footnote-1)
* Accessible products, services, and premises for people with disability also benefit other departmental staff.
* Increasing staff awareness of disability and cultural competence will lead to a more tolerant and inclusive workforce, more open to new ideas.
* A ‘disability confident’ culture will ensure that we can harness the benefits of diversity of our workforce and that we value and respect difference in all employees.
  1. Our responsibilities

The Department supports the rights of people with disability to participate fully in the community. Our approach to supporting people with disability in the workplace is based on the principles of universal design which means ensuring accessibility to workplace facilities, support and development is not a separate process but part of everyday business.

We have a responsibility to ensure that people with disability have equitable access to employment, promotion and leadership opportunities. Part of this responsibility entails ensuring selection processes and opportunities for professional development consider reasonable adjustments to ensure that people with disability can maximise their contribution to the Department and enjoy a rewarding career within the Department. Workplace participation is supported by the Department’s flexible working arrangements such as job sharing, part-time and home based work.

We are obliged to ensure that our services to the community are accessible, including providing information in accessible formats. We commit to ensuring that the needs and preferences of people with disability are taken into account when planning, delivering, promoting and evaluating our services. We have a responsibility to ensure that issues concerning people with disability are considered as new policy proposals, budgetary processes, procurement, departmental business plans and initiatives are developed. Our responsibility is set out clearly in *Australia’s Human Rights Framework*.

We have a responsibility to ensure that people with disability are able to raise concerns about barriers to their participation in the workplace and in accessing our services through mechanisms that are accessible and easy to use.

* 1. SES leadership and central support

The Department’s Disability Sponsor is one of our Deputy Secretaries who takes a leadership role in:

* Promoting and supporting the inclusion of people with disability
* Listening to the views and concerns of people with disability
* Ensuring that the Department’s Senior Executives and Executive Board are aware of the goals of the Disability Action Plan and progress towards meeting them.

The Disability Coordinator, within People Strategies Branch, supports the Disability Sponsor and provides a central point of support for people with disability, managers and colleagues to assist with individual and systemic issues, including a first point of contact for reasonable adjustments and JobAccess applications.

* 1. Improving our support: *Disability Action Plan 2016-2019*

The evaluation of the *Disability Action Plan 2012-14* provided valuable insights on further areas for improvement which have been captured in the development of the Department’s new three year Action Plan. The evaluation involved consultation with key internal stakeholders and a comparative review of planning approaches taken by other APS agencies.

The evaluation identified that while the Department continues to make progress in creating an inclusive workplace that supports employees with disability, we can strengthen our performance in the following areas:

* Increase the recruitment of people with disability through consideration of a range of measures, including;
  + using the APS *RecruitAbility* scheme for all vacancies
  + encouraging line areas to consider advertising of vacancies under ‘Special measures’ provisions.
* Support the retention of people with disability in the workplace through;
  + increasing awareness of managers on the application of appropriate reasonable adjustments, use of flexible working arrangements to support employees with disability and appropriate access to professional development
  + consideration of a centralised model of funding reasonable adjustments in the workplace.
* Ensure that a new Disability Action Plan is developed that measures progress in achieving outcomes and identifies a streamlined set of activities that directly contribute to those outcomes.
* Promote awareness of managers and staff with legislative requirements relating to employment of people with disability and the provisions of the *Disability Action Plan*.
  1. Measuring progress and success

The *Disability Action Plan 2016-2019* sets out the following four key outcomes:

* Our workplace culture is inclusive and values the employment of people with disability.
* [We attract, employ, develop and retain people with disability](#_Toc424815925).
* [Our premises and work environments are accessible to and supportive of people with disability](#_Toc424815926).
* We monitor and report p[rogress in achieving outcomes.](#_Toc424815927)

Each outcome is supported by goals and actions and progress in their implementation will be monitored by the People Committee through an annual report. This report will be shared with all employees through the intranet.

In addition to monitoring progress against goals and activities, a key measure of success will be increasing the representation of ongoing employees with disability in the Department’s workforce. As at 30 June 2015 people with disability represented 2.1 per cent of the Department’s ongoing workforce and the aim is to increase this representation to 2.5 per cent by 2018.

Achieving this target is likely to be affected by the low disclosure rates which continue to be an issue for the Department and across the APS. Not all people are confident in identifying as a person with disability, particularly if that disability is not obvious. While there is no obligation for a person to identify with disability, comprehensive and accurate diversity information allows the Department to:

* Understand the nature of our workforce.
* Provide more targeted training, advice and support.
* Identify and implement initiatives that assist in attracting, recruiting and retaining employees.
* Make sure we are building and sustaining a diverse workforce now and into the future.
* Provide greater focus on improving workplace culture and social inclusion.

The following performance measures will be used to assess progress in achieving the Plan’s outcomes.

* Representation of people with declared disability has increased to 2.5 per cent by December 2018.
* The proportion of employees who choose to inform the Department on their disability status has increased to 100 per cent by 2018.
* People with disability record comparable positive responses as other departmental employees on questions in the APS Employee Census relating to the Department’s support for diversity, respect and support in the workplace, and access to learning development opportunities.
* People with disability are satisfied that support for reasonable adjustment has been provided in a timely and comprehensive manner.

A comprehensive evaluation of the extent to which outcomes were achieved will be undertaken by the Disability Coordinator at the expiry of the term of the Plan.

1. Implementation Plan
   1. *Our workplace culture is inclusive and values the employment of people with disability*

| ***Goal*** | ***Actions*** | ***Lead Responsibility*** |
| --- | --- | --- |
| SES and EL2 managers model and promote the values of respect and inclusion in the workplace | The Department’s Disability Sponsor regularly engages with SES colleagues and staff on the importance of valuing people with disability through Divisional meetings and participation in social and celebratory events. | Departmental Disability Sponsor |
| Managers and supervisors encourage staff to participate in departmental events that recognise disability. | Managers and supervisors |
| New staff complete the Department’s orientation programme which includes modules on Disability awareness. | Managers and supervisors |
| SES and managers promote disclosure of disability status to employees. | SES and managers |
| Managers and supervisors actively support employees who self identify as having disability through reasonable adjustment and other processes. | Managers and supervisors |
| Managers and supervisors have the skills and tools to manage and support employees with disability | Managers are aware of and access support and information on early intervention services to assist staff to develop and maintain positive mental health. | Disability Coordinator |
| Managers/supervisors complete the elearning module on ‘Building Disability Confidence’. | Managers and supervisors |
| All employees have opportunities to learn about lived experiences of people with disability and the benefits of a workplace that is respectful and inclusive of people with disability | Actively promote and celebrate specific days that raise awareness of disability such as the International Day of People with Disability and Mental Health Week. | Injury Management and Rehabilitation Unit/Disability Coordinator |
| Promote the benefits of disclosure of disability status through regular all staff communications and commencement processes. | Disability Coordinator/Workforce Planning and Recruitment |
| Promote the APS *As One* *Employment Strategy* and supporting materials through all staff communications. | Disability Coordinator |
| Arrange jointly for delivery of regular information sessions on mental health and disability issues. | Injury Management and Rehabilitation Unit/Disability Coordinator |
| Promote completion of elearning modules that support disability awareness to all staff, particularly during Mental Health Week and other events. | Disability Coordinator |
| Explore the opportunity of providing Mental Health First Aid training through elearning. | Disability Coordinator |
| Guest speakers on disability in the workplace are invited to speak during Mental Health Week. | Injury Management and Rehabilitation Unit |

* 1. *We attract, employ, develop and retain people with disability*

| **Goal** | **Actions** | **Lead Responsibility** |
| --- | --- | --- |
| People with disability regard the Department as an employer of choice | Promote how the Department supports people with disability in the workplace through the departmental website and other promotional materials. | Disability Coordinator |
| Employment opportunities are promoted through a variety of media sources, educational units and community organisations to attract people with disability for roles in the Department. | Workforce Planning and Recruitment/Disability Coordinator |
| Managers recognise the benefits of recruiting people with disability and are confident in applying appropriate selection processes | Promote the benefits of employing people with disability to managers and work with line areas to implement the APS RecruitAbility Scheme and advertising under Special Measures. | Workforce Planning and Recruitment/Disability Coordinator |
| Review and deliver selection panel training to address interviewing techniques and application of reasonable adjustment in selection processes for people with disability. | Workforce Planning and Recruitment |
| People with disability are provided with employment opportunities through targeted initiatives | Apply APS RecruitAbility provisions to entry level programmes. | Workforce Planning and Recruitment |
| Trial the ‘Stepping Into’ internship programme in 2016 through the Australian Network for Disability (AND). | Disability Coordinator |
| Work with disability employment agencies to explore options for recruiting people with disability. | Workforce Planning and Recruitment/Disability Coordinator |
| People with disability have access to appropriate development opportunities to perform their role and pursue career goals. | People with disability are given the opportunity to establish a mentoring relationship to support career development. | Capability and Performance Section/ Managers |
| Training for people with disability is provided in accessible formats and venues. | Line areas responsible for delivery of training |
| Establish an annual Development Award to support an employee with disability to participate in a development opportunity that enhances their leadership/management skills | Disability Coordinator |

* 1. *Our premises and work environments are accessible to and supportive of people with disability*

| **Goal** | **Actions** | **Lead Responsibility** |
| --- | --- | --- |
| Premises are accessible to people with disability | The Department complies with the mandatory Disability (Access to Premises – Buildings) Standards 2010 in all future work designs, workplace restructures and office refurbishments. | Accommodation and Facilities/Managers |
| Ensure accessibility when required where Department functions are held outside usual premises. | Line areas responsible for the function |
| Ensure people with disability are consulted prior to fit out or refurbishing of premises to ensure accessibility issues are addressed. | Accommodation and Facilities |
| People with disability are provided with appropriate and timely workplace support. | Support participation and inclusion of people with disability by facilitating access to flexible working arrangements within operational requirements. | Managers and supervisors |
| Ensure the reasonable adjustment policy remains current and is promoted as part of early intervention strategies. | Disability Coordinator |
| Seek support for purchase of additional portable audio induction loops for departmental reception areas. | Disability Coordinator |
| Managers and Corporate Support Units facilitate reasonable adjustment requests for employees with disability. | Managers /Corporate Support Units |
| Seek support for the centralisation of funds in 2016-17 to facilitate implementation of reasonable adjustment requests | Disability Coordinator |
| Promote and increase the use of JobAccess as the preferred method of workplace assessment for people with disability (non-compensable). | Disability Coordinator/Injury Management and Rehabilitation Unit |
| Encourage communities of practice such as the Professional Employees Network for Disability, and Dragon Naturally Speaking users and that department staff use these groups as part of the consultation process. | Disability Coordinator |
| Maintain the priority status for assistive technology users with IT helpdesk and for IT roll-outs to ensure that their specific needs are taken into account. | IT Client Services |
| Ensure emergency evacuation plans in each Department location make provisions for people with disability. | Accommodation and Facilities |
| Promote and implement Personal Emergency Evacuation Plans as required. | Chief Warden |
| The Department’s IT and online services are designed in such a way that they are inclusive and meet the needs of users | All content delivered via online services is created, tested and maintained to conform to the Web Content Accessibility Guidelines (WCAG) Version 2.0 AA level. | All Department |
| Apply a user-centred design approach when building new or redeveloping existing online services. | Information Technology Branch |
| Support is available to promote and achieve WCAG compliance. | Information Technology Branch |
| New Departmental software and internet systems are tested to ensure compatibility with current assistive technology. | Information Technology Branch |
| Include provision for consultation with people with disability, particularly for users of assistive technologies, in ICT policies. | IT Client Services or IT Business Transformation |
| Opportunities for improving accessibility to the Department’s facilities and processes are identified | Undertaking a series of cyclical management initiated audits of the accessibility of the Department’s: |  |
| 1. Premises, against the mandatory Disability (Access to Premises - Buildings) Standards 2010. | Accommodation & Facilities |
| 1. Recruitment practices, against the Department’s policy and guidelines. | Workforce Planning & Recruitment |
| Provide advice to line areas on ways to increase accessibility to people with disability as needed. | Disability Coordinator |

* 1. *Progress in achieving outcomes is monitored and reported*

|  |  |  |
| --- | --- | --- |
| **Goal** | **Actions** | **Lead Responsibility** |
| The Department has access to quality information to inform strategies to improve disability confidence | Provide workforce data and results of the annual Employee Census to enable the Disability Coordinator to assess changes in representation and the experience of people with disability in the workplace. | Workforce Planning & Recruitment |
| Seek specific feedback from people with disability on their experience through PEND and other networks. | Disability Coordinator |
| Undertake annual diversity audit and promote the updating of personal details in ESS to improve disclosure rates. | Disability Coordinator |
| Report on progress achieved in implementing *Disability Action Plan 2016-2019* | Include update in departmental annual report on key achievements. | Disability Coordinator |
| Report annually to the Disability Sponsor and People Committee following the annual State of the Service reporting on disability issues and employment in the Department. | Disability Coordinator |
| Report to the People Committee annually on progress achieved and performance measures and promote outcomes on intranet and through Latest News. | Disability Coordinator |

1. Relevant legislation and policy context

***Disability Discrimination Act 1992***

The *Disability Discrimination Act 1992* provides protection for everyone in Australia against discrimination based on disability. It encourages everyone to be involved in implementing the Act and to share in the overall benefits to the community and the economy that flow from participation by the widest range of people.

***United Nations Convention on Rights of Persons with Disabilities 2008***

The Convention adopts a broad categorization of persons with disabilities and reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms.

***National Disability Strategy 2010-2020***

The National Disability Strategy sets out a ten year national plan for improving life for Australians with disability, their families and carers.

***National Mental Health and Disability Employment Strategy***

The Strategy aims to address the barriers that are faced by people with a disability and/or mental illness that make it harder for them to gain and keep work.

***Public Service Act 1999***

As public servants, we are obliged to comply with the APS Code of Conduct which is part of this Act.

***Fair Work Act 2009***

This Act provides that an employer cannot discriminate against an employee on the grounds of disability. Discrimination under this Act may also include a failure to make reasonable adjustment.

***Employment of People with Disability in the APS***

As One – Australian Public Service (APS) Disability Employment Strategy is the APS response to the [National Disability Strategy](http://fahcsia.gov.au/our-responsibilities/disability-and-carers/program-services/government-international/national-disability-strategy) (NDS) launched in 2011. As One aims to strengthen the APS to be a progressive and sustainable employer of people with disability. It also aims to improve the experience of people with disability in the APS. As One has been designed around four themes:

* Fostering inclusive cultures
* Increasing agency demand for candidates with disability
* Improving recruitment processes to enable more candidates with disability to enter the APS
* Improving leadership across the APS.

***Building codes and Australian Standards*** apply to ensure our premises are accessible.

1. Definitions

**Defining “Disability”**

The following two definitions of disability are in use in different circumstances. The definition of disability in the *Disability Discrimination Act 1992* is the one that should be used in connection with the development and implementation of policies, programs, services and activities. APS agencies are required to use the definition from the Australian Bureau of Statistics - *2003 Disability, Ageing and Carers Survey* for data collection.

It should be noted that a disability is always specific to a person, does not equate to poor health, and may not present any handicap to a person.

Definition in the Disability Discrimination Act 1992

Disability, in relation to a person, means:

1. total or partial loss of the person’s bodily or mental functions; or
2. total or partial loss of a part of the body; or
3. the presence in the body of organisms causing disease or illness; or
4. the presence in the body of organisms capable of causing disease or illness; or
5. the malfunction, malformation or disfigurement of a part of the person’s body; or
6. a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
7. a disorder, illness or disease that affects a person’s thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour;

and includes a disability that:

* + 1. presently exists; or
    2. previously existed but no longer exists; or
    3. may exist in the future; or
    4. is imputed to a person.

#### Definition in the Australian Bureau of Statistics - 2003 Disability, Ageing and Carers Survey

A person has a disability if they report that they have a limitation, restriction or impairment, which has lasted or is likely to last, for at least six months and restricts everyday activities. This includes:

* Loss of sight (not corrected by glasses or contact lenses)
* Loss of hearing where communication is restricted, or an aid to assist with , or substitute for, hearing is used
* Speech difficulties
* Shortness of breath or breathing difficulties causing restriction
* Chronic or recurrent pain or discomfort causing restriction
* Blackouts, fits or loss of consciousness
* Difficulty learning or understanding
* Incomplete use of arms or fingers
* Difficulty gripping or holding things
* Incomplete use of feet or legs
* Nervous or emotional condition causing restriction
* Restriction in physical activities or in doing physical work
* Disfigurement or deformity
* Mental illness or condition requiring help or supervision
* Long-term effects of head injury, stroke or other brain damage causing restriction
* Receiving treatment or medication for any other long-term conditions or ailments and still restricted
* Any other long-term conditions resulting in a restriction.

**Defining “Discrimination”**

Definition in the *Disability Discrimination Act 1992*

Disability discrimination:

(1) For the purposes of this Act, a person (discriminator) discriminates against another person (aggrieved person) on the ground of a disability of the aggrieved person if, because of the aggrieved person’s disability, the discriminator treats or proposes to treat the aggrieved person less favourably than, in circumstances that are the same or are not materially different, the discriminator treats or would treat a person without the disability.

(2) For the purposes of subsection (1), circumstances in which a person treats or would treat another person with disability are not materially different because of the fact that different accommodation or services may be required by the person with disability.

**Defining “Reasonable Adjustment”**

Reasonable Adjustment is any form of assistance or adjustment that is necessary, possible and reasonable to make to working arrangements, work methods, equipment or the work environment to reduce or eliminate the effects of disability. Reasonable adjustment enables people with disability to perform efficiently and effectively in the workplace and to compete on their merits for recruitment and career advancement opportunities. The Department will apply the principles of reasonable adjustment to remove barriers to facilitate full participation in all aspects of employment by employees with disability, as described in the Reasonable Adjustment Policy.

1. Adapted from Australian Network on Disability (2015) [*Employing people with disability*](http://www.and.org.au/pages/tapping-into-talent-employing-people-with-disability.html), Switzer Media & Publishing, p 5. [↑](#footnote-ref-1)