

COMCARE ACCESSIBILITY ACTION PLAN 2018–2020



Australian Government
Comcare



PURPOSE

Comcare values and respects the diversity of our employees and is dedicated to providing a positive and inclusive workplace.

In 2017, Comcare launched the Diversity and Inclusion Strategy 2017-20 which identifies key actions Comcare will undertake to improve diversity outcomes and demonstrate Comcare's commitment to a diverse workforce. The Accessibility Action Plan 2018-20 (AAP) provides practical actions to contribute to the priority areas in the Diversity and Inclusion Strategy, and the overall aim of creating a diverse and inclusive workplace culture, that supports and champions difference and ensures everyone has equal opportunity to participate, contribute and achieve their full potential.

This AAP outlines the actions that Comcare will take to increase disability representation and improve the experiences of Comcare employees and stakeholders living with disability, and ensure our compliance with the *Disability Discrimination Act 1982* (Cth).



OUR ACCESSIBILITY ACTION PLAN 2018–2020

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The commitment to create an accessible and inclusive workplace for Comcare employees with disability is intrinsically linked to our operational purpose of working with employees and employers to minimise the impact of harm in the workplace, improve recovery at and return to work, and promote the health benefits of work through good work design.

Comcare's AAP focuses on the experiences and contributions made by all our employees, creating a positive and inclusive workplace for employees living with disability, and providing a better service to the community. Our commitment to attract, recruit, engage and retain people living with disability is reflected in the identified AAP actions to increase disability representation and improve the employment experience for our employees.

In order to integrate the AAP into our workplace culture, the identified actions that arise from the plan have been aligned to Comcare's four cultural priority areas:

- > **Being trusted, empowered and accountable**—staff are supported in what they do, take responsibility for their work and actions and have the authority to do their job.
- > **Having commitment and focus**—Comcare is clear on purpose, outcomes and measurements, which staff can clearly link to their activities.
- > **Being collaborative**—supporting early collaboration with others (internally and externally), sharing information where appropriate, working together towards shared outcomes and benefits, and effectively communicating.
- > **Being a learning organisation**—Comcare takes a risk and evidence-based approach to innovation, encourages staff to ask questions, learn from mistakes and share these learnings.

PROGRESS

The actions in this plan have been identified through the progress and achievements made from the previous Comcare *Accessibility Action Plan (2015–17)*. Under that plan, the following achievements were made:

- > We successfully placed three tertiary level interns for short term placements through the Australian Network on Disability (AND) *Stepping Into* Program.
- > We have achieved and continue to ensure the compliance of the Comcare website in accordance with Web Content Accessibility Guidelines (WCAG) 2.0 requirements.
- > Five candidates have been successfully placed into positions through opting in to the APS *RecruitAbility* scheme.
- > Our agency's commitment to creating a diverse workforce is recognised in APS Employee Census results, with positive responses up from 67 per cent in 2014 to 80 per cent in 2018.
- > Our Procurement Guidance was amended to include information that supports employees and suppliers to consider accessibility and inclusivity principles in all procurement processes.
- > We created a new Australia Day Award category that celebrates the progression of accessibility and/or diversity in the workplace.

Comcare intends to continue the progress made by these actions, and to build on these achievements with the new actions identified in this AAP.

REPORTING AND REVIEW

The AAP will be managed and monitored by the People, Property and Security team in consultation with the People Committee, Diversity Champion and the Diversity Working Group (DWG).

We will track progress of this AAP through regular checks on its progress and the monitoring and evaluation of its outcomes. Progress reporting against the AAP will be provided quarterly to the People Committee.

RESPONSIBILITIES

Responsibilities for the actions contained in this plan are outlined in the Action Plan (below).

MEASURE OF SUCCESS

We will evaluate the success of our AAP by the following measures:

- > an increase in representation of employees with disability across the duration of the AAP
- > maintain or increased results in comparison to other similar sized agencies in the Australian Public Service (APS) Employee Census for questions relating to Inclusion and Diversity
- > feedback received from employees with disability reflects a high level of satisfaction with the support and reasonable adjustments made to enable them to perform their roles.

ACTION PLAN

Cultural Priority Area 1: Being trusted, empowered and accountable—staff are supported in what they do, take responsibility for their work and actions and have the authority to do their job.

How this is demonstrated in our AAP: As an agency, Comcare will build trust with and empower prospective and current employees, and external stakeholders living with disability. It is expected that through the delivery of these actions that Comcare's dedication to creating positive and inclusive workplaces for our employees with disability, as well as supporting other organisations to also achieve this will continue to be recognised.

Action	Deliverable	Timeline	Responsibility
1. Promote Comcare as a leading employer in our field for people with a disability.	<ul style="list-style-type: none"> > Continue to advertise job vacancies with the ability to opt in to use the RecruitAbility scheme. > Investigate disability graduate and traineeship programs and business cases are developed to test viability of participation (for example the Australian Public Service Commission's (APSC) GradAccess and NextStep programs). > Investigate opportunities to partner with external organisations to create employment pathways for people with a disability (for example, Job Active, universities). > Consider placing an accessibility statement on Comcare's careers website and in job advertisements to support candidates with disability. 	<p>Ongoing Annually</p> <p>September 2019 September 2019</p>	People, Property and Security team
2. Ensure all workplace access and inclusion obligations are met with respect to systems and property.	<ul style="list-style-type: none"> > Continue to ensure planning, design and construction processes in Comcare premises abide by Australian Government standards in accommodation. > Ensure all employees with a disability are aware of and have access to a Personal Emergency Evacuation Plan (PEEP). > Undertake an analysis of employee disability needs to determine where technology gaps may exist. > A business case is developed to include hearing loop technology in large meeting rooms as part of infrastructure upgrades. > Ensure technology supports employees with different needs and requirements. 	<p>Ongoing</p> <p>July 2019</p>	<p>People, Property and Security team</p> <p>Technology and Information Management team and People, Property and Security team</p>
3. Demonstrate Comcare's commitment to accessibility and inclusivity principles in procurement processes and promoting socially-inclusive procurement.	<ul style="list-style-type: none"> > Review and update procurement guidance to include information about disability-specific procurement platforms for consideration in procurement processes. > Communicate the changes to procurement guidance and the benefits of socially-inclusive procurement to all employees. 	September 2019	Finance and Assurance team

Cultural Priority Area 2: Having commitment and focus—Comcare is clear on purpose, outcomes and measurements, which staff can clearly link to their activities.

How this is demonstrated in our AAP: Comcare employees are committed to embodying a culture that values the contributions of people living with disability, and this commitment is demonstrated by Comcare’s Senior Executive Service leaders and modelled by all employees. The result of this will be that Comcare’s commitment to improving outcomes for people with disability will be known and recognised by all employees and stakeholders.

Action	Deliverable	Timeline	Responsibility
1. Comcare’s Senior Executive Service (SES) leaders commit to creating an inclusive and accessible workplace and encourage commitment of same from all employees.	<ul style="list-style-type: none"> > Comcare’s Diversity Champion will engage with SES leaders in the implementation of the Accessibility Action Plan (AAP) 2018–20. > Comcare’s Diversity Champion will attend the APSC Disability Champions Network meeting (or nominate an SES proxy) and reports on topics discussed to the DWG. > Our SES leaders will promote and support internal events relating to accessibility. 	Ongoing	Diversity Champion, SES leaders, supported by the DWG and the People, Property and Security team
2. Demonstrate our commitment by maintaining membership to disability expert bodies and leverage off opportunities provided by them.	<ul style="list-style-type: none"> > Corporate membership to Australian Network on Disability (AND) is renewed annually. > Our Diversity Champion attends the AND Champions Network meetings and reports on topics discussed to the DWG. > A member of the DWG attends AND members roundtable meetings and reports on topics discussed to the DWG. > Comcare continues to participate in the AND ‘Stepping Into’ internship program for tertiary students with a disability to assist them to develop their work skills, with at least one internship offered per summer/winter season. 	Ongoing	Diversity Champion, supported by the DWG and the People, Property and Security team
3. Cultivate a workplace that provides high levels of support for people with disabilities to assist them to successfully perform their duties.	<ul style="list-style-type: none"> > A survey will be conducted with Comcare employees with disability to measure their level of satisfaction with reasonable adjustments made (if any) and identify any improvements that could be made to this process. Improvements will be implemented where feasible. 	Annually	People, Property and Security team

Cultural Priority Area 3: Being collaborative—supporting early collaboration with others (internally and externally), sharing information where appropriate, working together towards shared outcomes and benefits, and effectively communicating.

How this is demonstrated in our AAP: Comcare employees work together to create an environment that is healthy and safe, and that acknowledges and supports employees living with disability. The impact of this will be that all Comcare employees are engaged in conversations about how to improve outcomes for people with disability and are accountable for achieving this.

Action	Deliverable	Timeline	Responsibility
1. Increase the level of awareness and understanding of the AAP.	> Promote key activities of the AAP to Comcare employees via Comcare’s intranet (ComNet) by publishing a quarterly news article.	Ongoing	DWG, People, Property and Security team and Corporate Strategy and Communications team
2. Develop and maintain psychological health resources that promote mental health and wellbeing in the workplace.	> Maintain Mental Health Australia Gold Standard with at least 10 per cent of employees trained in Mental Health First Aid.	Ongoing	People, Property and Security team
	> Continue to develop Team Talk resources (used as a focal point for discussion to increase understanding of health and safety at Comcare) in line with emerging issues related to mental health.	Ongoing	People, Property and Security team
	> Partner with industry leaders and experts in workplace mental health to develop best practice resources that facilitate mentally healthy workplaces.	March 2019	Strategic Research and Innovation
3. Develop a workplace in which leaders at all levels understand accessibility issues and are confident in implementing reasonable adjustments and flexible working arrangements to support people with disability or ill health.	> Develop an accessibility support toolkit for managers.	March 2019	People, Property and Security team
	> Investigate the feasibility of implementing an Independent Wellbeing Plan for employees to voluntarily discuss with their manager, in line with the Performance Development Plan cycle.	July 2019	People, Property and Security team and Strategic Research and Innovation

Cultural Priority Area 4: Being a learning organisation—Comcare takes a risk and evidence-based approach to innovation, encourages staff to ask questions, learn from mistakes and share these learnings.

How this is demonstrated in our AAP: Opportunities will be provided for all Comcare employees to develop a better knowledge of matters associated with living with a disability. This will ensure that Comcare’s collective understanding of matters relating to disability awareness continues to increase and remain current.

Action	Deliverable	Timeline	Responsibility
1. Develop a workplace that promotes disability confidence of managers and employees.	<ul style="list-style-type: none"> > Promote resources from AND membership to provide information and support for Comcare employees about disability confidence by releasing quarterly news article on ComNet. > Deliver a pilot session of Disability Confidence training for employees and assess the viability of delivering to all employees. 	<p>Quarterly</p> <p>April 2019</p>	People, Property and Security team
2. Promote and celebrate key awareness events relating to disability and mental health.	<ul style="list-style-type: none"> > Commemorate <u>RUOK Day</u>, <u>World Mental Health Day</u>, and <u>International Day of People with Disability</u> annually with an appropriate event, such as a speaker presentation or ComNet awareness piece. 	Annually	DWG, supported by People, Property and Security team and Corporate Strategy and Communications team
3. Increase the level of confidence amongst employees with a disability, to disclose this information in the Equity and Diversity section of ESS.	<ul style="list-style-type: none"> > Communicate how equity and diversity details are used in Comcare, to alleviate potential concerns for employees with a disability and explain the importance of having this information to inform strategies and other initiatives. 	Annually	DWG and People, Property and Security team

APPENDIX 1: COMMONWEALTH DEFINITIONS OF DISABILITY

Comcare uses two Commonwealth definitions of disability.

From 1 September 2017¹, the definition of 'disability' used for employment-related purposes (other than discrimination) in the APS is based on the Australian Bureau of Statistics' Survey of Disability, Ageing and Carers.²

Persons are considered to have a disability if they have a limitation, restriction or impairment, which has lasted, or is likely to last, for at least six months and restricts everyday activities³. This includes:

Sensory

- > 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.

Intellectual

- > Difficulty learning or understanding things.

Physical

- > Shortness of breath or breathing difficulties that restrict everyday activities.
- > Blackouts, seizures or loss of consciousness.
- > Chronic or recurrent pain or discomfort that restricts everyday activities.
- > Incomplete use of arms or fingers.
- > Difficulty gripping or holding things.
- > Incomplete use of feet or legs.
- > Restriction in physical activities or in doing physical work.
- > Disfigurement or deformity.

Psychosocial

- > Nervous or emotional condition that restricts everyday activities.
- > Mental illness or condition requiring help or supervision.
- > Memory problems or periods of confusion that restrict everyday activities.
- > Social or behavioural difficulties that restrict everyday activities.

Head injury, stroke or acquired brain injury

- > Head injury, stroke or other acquired brain injury, with long-term effects that restrict everyday activities.

Other

- > Receiving treatment or medication for any other long-term conditions or ailments and still restricted in everyday activities.
- > Any other long-term conditions resulting in a restriction in everyday activities.

The second definition is from section 4 of the *Disability Discrimination Act 1992*.

The *Disability Discrimination Act 1992* defines disability as:

- (a) total or partial loss of the person's bodily or mental functions; or
- (b) total or partial loss of a part of the body; or
- (c) the presence in the body of organisms causing disease or illness; or
- (d) the presence in the body of organisms capable of causing disease or illness; or
- (e) the malfunction, malformation or disfigurement of a part of the person's body; or
- (f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) 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:
- (h) presently exists; or
- (i) previously existed but no longer exists; or
- (j) may exist in the future (including because of a genetic predisposition to that disability); or
- (k) is imputed to a person.

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