



Australian Government
Productivity Commission

Disability Action Plan 2007-10

Personnel Policy

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found under PCNet-
Personnel-
Personnel Policy-
Accessibility & Diversity

Disability Action Plan

1 Introduction

- 1.1 The Productivity Commission's latest Disability Action Plan 2007-10 sets out its commitment and approach to addressing awareness, access and opportunities for people with disabilities in accordance with the *APS Values, Disability Discrimination Act 1992 (DDA)* and *Commonwealth Disability Strategy*.
- 1.2 Related documents are the Commission's *Collective Agreement, Equity & Diversity Plan, Service Charter and Access & Equity Plan*.

2 Definitions

- 2.1 The definitions of disability and discrimination for the purposes of the *DDA* are set out at Annex A.

3 Commonwealth Disability Strategy (CDS)

- 3.1 The CDS was introduced in 1994 to assist Australian government agencies meet their obligations under the *DDA*. An evaluation of the CDS was conducted in 1999 and again in 2005-06.
- 3.2 The CDS sets out the following broad principles which agencies are to address:

Equity: people with disabilities have the right to participate in all aspects of the community including the opportunity to contribute to its social, political, economic and cultural life

Inclusion: all mainstream Australian government programs, services and facilities should be available to people with disabilities. The requirements of people with disabilities should be taken into account at all stages in the development and delivery of these programs and services

Participation: people with disabilities have the right to participate on an equal basis in all decision-making processes that affect their lives

Access: people with disabilities should have access to information in appropriate formats about the programs and services they use

Accountability: all areas of Australian government organisations should be clearly accountable for the provision of access to their programs, facilities and services for people with disabilities. This includes specifying the outcomes to be achieved, establishing performance indicators and linking reporting on outcomes of the Strategy to mainstream reporting mechanisms.

4 Management Advisory Committee Report 6 (MAC 6)

- 4.1** In addition to the CDS, in August 2006 the MAC 6 on the *Employment of People with Disability in the APS* was released. It contains eight objectives for promoting the employment of people with a disability in the APS. This document is available on PC Net/ Personnel/ Accessibility & Diversity.
- 4.2** This report and subsequent APS Commission Good Practice Guides, such as *Ability at Work*, will be incorporated into ongoing initiatives through this latest *Disability Action Plan*.

5 The Commission's Role

- 5.1** The Productivity Commission is the Australian Government's principal review and advisory body on microeconomic policy and regulation.
- 5.2** The Commission's core function is to conduct public inquiries on key policy or regulatory issues bearing on Australia's economic performance and community wellbeing. It also undertakes a variety of research at the request of government and to support its responsibilities.
- 5.3** The Commission's work covers all levels of government and encompasses all sectors of the economy, as well as social and environmental issues.

6 The Commission's Approach

- 6.1** The Commission is committed to promoting the *APS Values* and addressing the CDS principles through the following strategies:

A. *Employee awareness raising*

We will continue measures to promote heightened awareness amongst our employees of the CDS principles through:

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- making the CDS and this Plan available to all employees
 - promoting CDS principles and this Plan at appropriate opportunities (such as the Chairman's staff meetings, Staff News, International Day for People with a Disability (3 December) and specific training sessions)
 - training and provision of information for selection panels as required
 - ensuring induction programs include information about the CDS and this Plan.

B. *Internal policies and procedures*

In developing and reviewing our internal policies and procedures, we will ensure that the needs of employees and stakeholders with disabilities are considered through:

- specifically 'asking the question' of ourselves before signing off on policies and procedures
- in line with MAC 6 objectives review *Recruitment Guidelines*
- investigate opportunities to provide work experience and mentoring and attract additional employment applicants with a disability
- assess networking opportunities with other agencies and organisations.

C. *Undertaking our core business*

In conducting our public inquiries, research projects and other activities we will assess the impact of our policy proposals on the lives of people with disabilities prior to finalisation of those proposals through:

- including in our activity checklists the requirement to consider CDS principles, and recording such consideration in the public document or internal records
- providing guidance to our employees on the steps to be considered by having available an appropriate checklist (see Annex B).

D. *Consultation*

Where considerations reveal a likely impact on the lives of people with disabilities, consultation with those people or their representatives will be initiated through:

- determining the nature and extent of such consultations on a case-by-case basis as this is likely to vary according to individual circumstances.

E. *Information provision*

Where we identify, or people with disabilities self-identify, the need for information in formats other than those normally provided, we will endeavour to meet such needs in a timely manner through:

- ensuring our website complies with World Wide Web Consortium's (W3C) standards for accessibility (Priority 1), working towards Priority 2, and elements of Priority 3 checklists
- including on our web site information related to accessibility issues and assistance
- meeting all reasonable requests for the provision of information in accessible formats, such as Braille, large print and audiocassette, as soon as possible. This will be facilitated through the register of providers of diversity information and services. Providers from a number of sources, including the CDS register are included and additional details on the timeframes for providing material, costings and booking procedures outlined.
- undertaking any other reasonable actions to ensure timely accessibility to Commission information
- maintaining a 'register of requests for information and assistance' to assist in planning for future needs and to aid our external reporting requirements.

F. *Access to premises*

We will ensure our activities are undertaken in premises accessible to employees and stakeholders with disabilities through:

- having regard to the needs of people with disabilities in respect of our existing premises, any new premises we may consider, and any external premises we may use in the conduct of our activities (eg training venues, public hearings)
- making appropriate arrangements to specifically assist people with disabilities with access to Commission premises and venues.

G. *Reporting*

We recognise our external reporting obligations and will meet the CDS reporting requirements through:

- reporting against the appropriate performance indicators as defined in the CDS (see Annex C)
- maintaining and updating Australian Public Service employment data (APSED) and other records to enable factually based reporting on the various performance measures.

H. *Complaints mechanisms*

We will have available for stakeholders and employees avenues by which to raise issues and concerns relating to disability matters for:

- external stakeholders, through the avenues set out in the Commission's Service Charter
- employees, through the avenues set out in the Commission's Collective Agreement and individual Australian Workplace Agreements.

I. *Monitor and review*

We will monitor and review the operation of this Plan to ensure that we continue to meet our CDS obligations through:

- Management Committee receiving a report from the Diversity Coordinator every six months, or as required should particular significant issues arise
- keeping employees informed on progress with the Plan at appropriate intervals
- reviewing the Plan ahead of its nominated expiry or in light of any significant change in government requirements.

6 Further Information

6.1 For further information, contact the Diversity Co-ordinator in Personnel on Ext 2237.

6.2 This document is available electronically to all employees on PC Net/Employment Conditions/Personnel Policy and Procedures/Accessibility & Diversity.

Definitions of Disability

General (for the purpose of recruitment and retention activities)

The definition of disability for the purposes of the *Disability Discrimination Act* section 4 is:

- total or partial loss of the person's bodily or mental functions
- total or partial loss of a part of the body
- the presence in the body of organisms causing disease or illness
- the presence in the body of organisms capable of causing disease or illness
- the malfunction, malformation or disfigurement of a part of the person's body
- a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction
- a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour.

The definition of disability is broad to ensure that everyone who has a disability is protected:

- the disability may be permanent or temporary
- it may exist from birth or be acquired later in life
- a person may have one disability or a number of disabilities
- a person may be treated as having a disability when in fact he or she does not
- a person's disability may be apparent, such as loss of a limb, or hidden, such as epilepsy or depressive illness
- disability may be more or less severe in its impact
- people with the same disability are likely to have different abilities.

The aim of the definition is to ensure cases brought under the *Act* focus on alleged discrimination rather than contesting an applicant's disability status.

This definition is however difficult to operationalise at the practical process of data collection for APSED, therefore a different definition of disability, used by the Australian Bureau of Statistics is used to collect data and statistics from APS employees. This definition is included in the Commission's APSED collection form.

What is Discrimination under the Disability Discrimination Act?

Refer to the Australian Human Rights & Equal Opportunity Commission website, http://www.humanrights.gov.au/disability_rights/faq/discrimination.htm.

CHECKLIST FOR DEVELOPING REPORTS/POLICIES IN CONSULTATION WITH PEOPLE WITH DISABILITIES¹

Consider the needs of people with disabilities

- Do you know what the impact of your report or policy will be for people with disabilities?
- Do you consider how the impact of your proposal may vary between people with different types of disabilities?
- Do you consult with people with disabilities, their representatives or other relevant agencies to determine the likely impact of any changes?
- How do you document that you have considered disability access issues as part of the process? (this needs to be included in your evaluation report).

Remember – this indicator applies to all mainstream Australian government policies and programs not just those that are ‘disability specific’.

Identifying the needs of people with disabilities

- The Commonwealth Disability Strategy (CDS) Website lists a range of national peak disability organisations who may be able to advise on the impact of your proposed report or policy on people with disabilities – see www.facsia.gov.au/disability/cds/index.htm. It lists companies able to convert information into accessible formats such as Braille, easy English, large print, audiocassette and accessible electronic formats. See also PC Net/Employment Conditions/Personnel Policy and Procedures/Accessibility & Diversity for a list of those organisations that have been identified as able to assist in the provision of various formats.

Identify and include people with disabilities as stakeholders

- In defining your target audience for consultation, do you consider whether some members of your audience will be people with disabilities?
- Are there any barriers in your consultation methods which would prevent a person with a disability from participating in the process for example, inaccessible venues for public consultations, lack of information in accessible formats, restricted timeframes for providing input?

¹ Adapted from Family and Community Services’ Disability Action Plan 2001-2004

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- Do you seek input from organisations that represent the views of people with disabilities?
 - Do you invite people with disabilities to be part of your reference or focus groups when developing reports or reviewing policies?

Remember – this indicator applies to all mainstream Australian government policies and programs not just those that are ‘disability specific’.

When should we consult?

Targeted consultations with people with disabilities are necessary when:

- disability specific policies, programs or services are being developed or changed
- whole community policies, programs or services which may have direct impacts on people with disabilities are being developed or changed.

When a whole community report or policy impacts equally on all, specific targeting of people with disabilities is not necessary. However, people with disabilities represent a significant part of the community and they should be included as part of broadly representative consultations.

Who should we consult?

The disability community consists of people with disabilities, their families, carers, advocates and service providers. These people may be from different cultural or linguistic backgrounds, including Aboriginal and Torres Strait Islander background, or may live in rural or remote areas. Ideas about how to contact these people are listed in the CDS Kit ‘Inclusive consultation – A practical guide to involving people with disabilities’. This kit is available from Personnel. The CDS website www.facsia.gov.au/disability/cds/index.htm also lists a range of national peak disability organisations.

Strategies to achieve the Commonwealth Disability Strategy (CDS) Outcomes - Action Plan

STRATEGIES How will this be achieved?	PERFORMANCE MEASURES How will we measure our success?	Timing	Action
A. Employee awareness raising	<p>That the actions listed have occurred:</p> <ul style="list-style-type: none"> - the CDS and the Plan are available to all employees on PC Net and from Personnel - the CDS and the Plan are promoted at appropriate opportunities - training, information for selection panels and induction programs include appropriate information 	<p>Feb 08</p> <p>ongoing</p> <p>ongoing</p>	<p>CSB</p> <p>Chairman/HOO CSB/Trainers/ Inductors</p> <p>CSB/Inductors</p>
B. Internal policies and procedures incorporate CDS principles	<ul style="list-style-type: none"> - internal policies and procedures consider the needs of employees and stakeholders with disabilities - investigate opportunities to provide work experience, mentoring, employment - networking with other agencies and organisations 	<p>ongoing</p> <p>ongoing</p> <p>ongoing</p>	<p>Authors/CSB/ MCM/ PCCC</p> <p>CSB/Diversity Co-ordinator</p> <p>CSB/Diversity Co-ordinator</p>
C. When undertaking core business assess the impact of policy proposals on the lives of people with disabilities	<ul style="list-style-type: none"> - including in our activity checklists the requirement to consider CDS principles and recording such consideration in the public document or internal records - providing guidance to employees on steps to be considered by having available an appropriate checklist (Annex B) 	<p>ongoing</p> <p>ongoing</p>	<p>FACs/ Branch Managers/ Inq/Res Directors</p> <p>CSB/FACs/ Branch Managers/ Inq/Res Directors</p>

STRATEGIES How will this be achieved?	PERFORMANCE MEASURES How will we measure our success?	Timing	Action
D. Consultation to be initiated where considerations reveal a likely impact on the lives of people with disabilities	That the actions listed have occurred: <ul style="list-style-type: none"> - to be determined on a case-by-case basis as this is likely to vary according to individual circumstances 	ongoing	CSB/FACs/ Branch Managers/ Inq/Res Directors
E. Where identified, or people with disabilities self-identify, the need for information in formats other than those normally provided, endeavour to meet such needs in a timely manner	<ul style="list-style-type: none"> - ensuring PC website complies with Government online requirements for accessibility - meeting all reasonable requests for audio or Braille formats as soon as possible - undertaking any other reasonable actions to ensure timely accessibility to Commission information - maintain a 'register of requests for information and assistance' to assist in planning and reporting under Section G. - publish on PC Net a register of providers of diversity information and services with costings and delivery times to facilitate requests in a timely manner 	ongoing ongoing ongoing ongoing	PC Website Unit MAPS or relevant project team/ Diversity Co-ord Inq/Res team/ PC Website Unit/MAPS Diversity Co-ord Diversity Co-ord Diversity Co-ord

STRATEGIES How will this be achieved?	PERFORMANCE MEASURES How will we measure our success?	Timing	Action
I. Monitoring and reviewing this Plan	<p>That the actions listed have occurred:</p> <ul style="list-style-type: none"> - MCM to receive a report from the Diversity Co-ordinator every six months - keeping employees informed on progress with the Plan through ‘all staff’ meetings, PC Net, Staff News articles and other avenues at appropriate intervals - reviewing the Plan ahead of its nominated expiry date or in light of any significant changes to the CDS 	<p>ongoing</p> <p>ongoing</p> <p>2010</p>	<p>Diversity Co-ord/ SERWD</p> <p>Chairman/CSB Diversity Co-ord</p> <p>CSB/Diversity Co-ord/ SERWD</p>