



**Australian Government**

**Department of Families, Housing,  
Community Services and Indigenous Affairs**



# **Disability Action Plan**

## Framework for Business

**Improving the lives of Australians**



Australian Government

---

Department of Families, Housing,  
Community Services and Indigenous Affairs

# **Disability Action Plan**

Framework for Business

**ISBN: 978-1-921380-23-5**

© Commonwealth of Australia [2009]

This work is copyright. It may be reproduced in whole or part subject to the inclusion of an acknowledgment of the source and no commercial usage or sale. Reproduction for purposes other than those indicated above, require the prior written permission from the Commonwealth available from the Commonwealth Copyright Administration, Attorney-General's Department. Requests and inquiries concerning reproduction and rights should be addressed to the Commonwealth Copyright Administration, Attorney-General's Department, Robert Garran Offices, National Circuit, Canberra ACT 2600 or posted at <http://www.ag.gov.au/cca>

**DISCLAIMER:** While all care is taken the Commonwealth accepts no responsibility for the accuracy or completeness of any material contained in the publication. Additionally, the Commonwealth disclaims all liability to a person in respect of anything, and of the consequences of anything, done or omitted to be done by any such person in reliance, whether wholly or partially, upon any information presented in this publication. This publication is intended to provide a suggested framework for organisations in developing a Disability Action Plan for employing people with a disability. However, material in this publication is made available on the understanding that the Commonwealth is not endorsing any particular framework. Before relying on any material in this publication readers should rely upon their own investigations.

**This booklet has been printed by an Australian Disability Enterprise.**

## Contents

<b>What is a Disability Action Plan?</b>	<b>1</b>
<b>Why have an Action Plan?</b>	<b>1</b>
<b>Developing an Action Plan</b>	<b>2</b>
<b>What to do first</b>	<b>3</b>
<b>Action Plan checklist</b>	<b>3</b>
<b>Going for gold</b>	<b>4</b>
<b>Getting practical</b>	<b>5</b>
<b>Steps to success</b>	<b>6</b>
<b>Further information</b>	<b>7</b>
<b>Attachment A: Sample Disability Action Plan</b>	<b>8</b>
<b>Attachment B: Sample memorandum of understanding</b>	<b>10</b>



## What is a Disability Action Plan?

A Disability Action Plan is a part of a strategy for changing your business practices to better engage people with disability and avoid unintentional discrimination. It is a voluntary agreement that demonstrates your commitment to improving:

- ▶ **employment opportunities** for people with disability
- ▶ the **accessibility** of business premises and/or shopfronts, to enable customers with disability to enjoy equal access.

A Disability Action Plan will help your business develop a blueprint for positive change, and will identify positive practices to implement those changes.

This booklet aims to assist Australian businesses to gain a better understanding of Disability Action Plans, and provides practical advice, tips, and tools to enable you to develop your own Disability Action Plan.<sup>1</sup>

## Why have an Action Plan?

A recent survey conducted in the United Kingdom found that a staggering 83 per cent of people with disability had avoided a business after being unable or unwilling to make a purchase due to accessibility issues.<sup>2</sup>

Developing a Disability Action Plan makes good business sense. Engaging people with disability can benefit everyone—from employees to customers to your bottom line. It can provide employment opportunities to people with disability and a broader labour base for businesses to recruit from, and has the potential to increase the diversity and experience of your employees. Implementing an Action Plan can also unlock a wider customer base.

Other benefits include:

- ▶ **Getting savvy:** According to the Australian Bureau of Statistics, people with disability represent approximately 20 per cent of the population, or almost four million people.<sup>3</sup> This represents an important cross-section of your customer base as well as an often untapped labour pool. When relatives, friends, carers, colleagues, and business associates of people with disability are added to this cross-section, your business is presented with a sizable share of the Australian market which it cannot ignore.
- ▶ **Accessing an untapped sector of the employment market:** People with disability represent 16.6 per cent of Australia's working age population<sup>4</sup>, yet have lower participation rates and higher unemployment rates than the general population. In a time of skills shortages and an ageing population, there are real organisational benefits in developing a Disability Action Plan and engaging people with disability as employees.

---

<sup>1</sup> This booklet draws on the work of a number of organisations, including the Australian Human Rights Commission.

<sup>2</sup> Walk Away Pound Survey, Employers Forum on Disability and Royal Association for Disability and Rehabilitation (UK), 2006.

<sup>3</sup> Australian Bureau of Statistics, Survey of Disability, Ageing and Carers, Canberra, 2003 (Cat No. 4430).

<sup>4</sup> Australian Bureau of Statistics, Survey of Disability, Ageing and Carers, Canberra, 2003 (Cat No. 4430).

- ▶ **Lower absenteeism:** Contrary to popular belief, people with disability take fewer than average sick days and make fewer workplace health and safety claims.
- ▶ **Broadening your customer base:** Businesses that understand the impact of disability on their customers have the potential to reach a wider market.
- ▶ **Managing risks:** One clear and avoidable risk for businesses is the failure to provide access to people with disability. An Action Plan can help identify ways to ensure accessibility to your premises, thus managing this risk.
- ▶ **Discriminating is against the law:** Specific Commonwealth, State and Territory legislation makes it unlawful to discriminate on the grounds of disability in most areas of life. An Action Plan allows you to work towards compliance with legislation, including the *Disability Discrimination Act 1992* (Commonwealth).

## Developing an Action Plan

Developing and implementing a Disability Action Plan is similar to any best practice approach to business—it will fit comfortably within your objective of ensuring continued commercial success. A Disability Action Plan should be tailored to meet the particular needs of your business.

To develop a successful Disability Action Plan, your business needs to:

1. commit to change and demonstrate this to your employees—for example, you could identify senior champions within your organisation who can demonstrate their commitment to the rest of your workforce
2. consult people with disability currently employed in your business
3. consult your customers
4. review current practices
5. develop policies and programs to eliminate disability discrimination
6. set goals, targets and time frames
7. develop and incorporate evaluation strategies, including performance indicators
8. appoint people within your business to be responsible for the implementation of the plan
9. communicate the plan to everyone in the business, keep them informed and keep it on the agenda
10. spread the word—tell others about your success.

## What to do first

To begin the process, consider the following questions. It may be helpful to document your answers.

- ▶ Who are the **logical champions** in your business? Are they senior enough to effect organisational change? Do they have the time and commitment required to drive change? What can you do to support and encourage them to take on this role?
- ▶ How will you **collect information**?
- ▶ How can you harness the **knowledge and experience** of people with disability currently working in your business?
- ▶ What will your **tangible goals and targets** be? How will you measure them?
- ▶ Is there an area within the organisation **where you already do well**? Can you highlight this in the plan?
- ▶ Where can you **get advice** on best practice or standards?
- ▶ What period will your plan cover? **What will happen at the end** of that time?
- ▶ How many people with disability do you currently have as clients, customers and employees? **How many potential customers are you missing?**
- ▶ Have you ever thought about what it would be like to have a disability?
- ▶ Have you ever considered how difficult it would be to access your business if you had a disability?
- ▶ What are some examples of the different sorts of access issues within your business?
- ▶ What are some of the possible **solutions** to these different access issues? What could you **fix right now**?
- ▶ What does your **marketing plan** say about your client base? Does it include any strategies for people with disability or people with caring responsibilities?

## Action Plan checklist

How comprehensive is your Disability Action Plan? It should include the following actions:

- Identify** the business case and **communicate it** to all employees to get them involved and interested. This could include a communication strategy within your organisation and a process for engaging staff to support the plan
- Review practices and policies** in the business that impact on people with disability and their carers
- Establish a process for **consulting** people with disability either employed by your business, or who purchase your products and services

- ❑ Collect **information** about people with disability and people with caring responsibilities in order to understand the needs of your workforce and potential customers
- ❑ **Identify physical barriers** that limit access to your business
- ❑ **Identify communication barriers** that limit access to your business
- ❑ Set clear **goals and targets**, including employment of new employees
- ❑ Develop proactive **recruitment practices** to actively engage applicants with disability
- ❑ Establish a process for **measuring** these recruitment practices and reporting on them
- ❑ Set up a process for **evaluation and review**.

See Attachment A for a sample Disability Action Plan.

## Going for gold

To ensure your action plan is as strong as it can be, you could consider:

- ▶ conducting an **audit** to see how well you currently operate as a disability-friendly business
- ▶ setting up a **network of employees** with disability within your business
- ▶ setting an ambitious **employment target** with a clear time frame and challenging your managers to meet it
- ▶ identifying **senior champions** in your business to promote the Action Plan
- ▶ **reviewing purchasing practices** and purchasing from an Australian Disability Enterprise<sup>5</sup>
- ▶ developing **flexible working arrangement** policies for all employees, including people with disability and people with caring responsibilities
- ▶ contacting an **access consultant** to suggest solutions or undertake an access audit. There are a number of very good **access consultants** who have disability—by engaging their services you are also providing opportunities to people with disability
- ▶ **organising training** or information sessions for your staff through your local disability service provider
- ▶ asking **someone with practical experience**, such as a representative from Better Hearing or Blind Citizens Australia, to present information to your business or management team
- ▶ becoming a **leader and a champion** with other businesses in your industry sector
- ▶ providing **mentoring** to people with disability both inside and outside your business. Providing opportunities and skills to people with disability can assist them to reach their full potential, as well as build more diverse management and professional skills for business leaders
- ▶ encouraging **line managers** to work closely with new recruits early on to identify issues—such as access—early and implement solutions. The early stages are vital to successful employment for people with disability

---

<sup>5</sup> Australian Disability Enterprises are commercial businesses that employ people with disability.

- ▶ developing a policy on **reasonable adjustments** or changes you can make to the workplace to assist an employee with disability to do the job
- ▶ wherever possible, allowing employees some **flexibility** in tasks and times to accommodate their disability or caring responsibilities, as well as utilising their other strengths
- ▶ adjusting your **products and services** to meet the needs of customers with disability
- ▶ developing a **memorandum of understanding** with an employment provider for people with disability.

See Attachment B for a sample memorandum of understanding.

## Getting practical

There are a number of physical and communication barriers to accessibility for employees and customers.

### **Barriers to accessing places and spaces include:**

- ▶ weight of doors
- ▶ width of doorways and corridors
- ▶ height of steps and kerbs
- ▶ slope of ramps
- ▶ access to and height of desks, counters and reception areas
- ▶ parking availability and proximity to public transport
- ▶ toilet facilities
- ▶ height of locks and door handles
- ▶ lighting and signage
- ▶ lack of tactile and other indicators for people who are sight impaired
- ▶ height of security pass access readers.

You should also consider your business's emergency evacuation procedures to ensure all staff can be easily evacuated from the building in an emergency.

### **Barriers to accessible information include:**

- ▶ height of pamphlet containers
- ▶ design of reception areas and accessibility to buzzers and phones
- ▶ language in written information that is too complex or contains jargon—plain English should be the standard for all written information and, where appropriate, alternate formats such as large print should be considered
- ▶ websites that do not meet WC3 Accessibility Guidelines.<sup>6</sup>

---

<sup>6</sup> To access a copy of the current WC3 Accessibility Guidelines, go to [www.w3.org](http://www.w3.org)

## Steps to success

**Tip:** Talk with your current employees, by survey or in person. Are they a person with disability? Are they a carer? Do they have suggestions or comments for how your workplace, recruitment policy, products and services can become more accessible?

The following steps are suggested to assist in developing a Disability Action Plan for your organisation.

### **Step 1**

Nominate someone to coordinate a review. This would normally be the person responsible for development and implementation of your Disability Action Plan.

### **Step 2**

List all your direct and contracted services.

### **Step 3**

Rank the services identified according to their frequency of use or impact on people with disability.

### **Step 4**

Identify who will conduct the review. Consider the need for transparency, impartiality, and options—such as an internal audit to be completed by corporate services, or an external audit by a specialist consultant.

### **Step 5**

If internal staff are selected to conduct the review, assess their knowledge of disability-specific issues and provide training if necessary.

### **Step 6**

Determine the financial resources required for conducting the review.

### **Step 7**

Decide how the review will be conducted—for example, by program, priority of service delivery, usage, level of risk, etc.

### **Step 8**

Use the checklist in this booklet to identify key issues to consider in the review. Seek expert advice on key access issues and how to plan for improvement.

### **Step 9**

When the review is completed, summarise the issues identified.

### **Step 10**

Rank the issues and identify what action is required. Give priority to access issues that impact the most on people with disability.

### **Step 11**

Seek advice on the best and most economical way of dealing with access barriers.

### **Step 12**

Develop a Disability Action Plan that identifies barriers to access, strategies to remove those barriers, timelines for improvement, associated cost barriers and the people responsible for the outcome.

### **Step 13**

Set a review date to accommodate new, emerging or unforeseen issues that may impact on the current Disability Action Plan.

## Further information

This booklet is intended as a guide only. You can obtain further information on developing a Disability Action Plan from the Australian Human Rights Commission at [www.hreoc.gov.au](http://www.hreoc.gov.au). The Commission can also provide a list of companies with existing plans, and inform you of your legal responsibilities under the Disability Discrimination Act.

A range of other resources may be helpful:

- [www.jobaccess.gov.au](http://www.jobaccess.gov.au) — JobAccess is an Australian Government initiative that provides help and workplace solutions for the employment of people with disability.
- [www.and.org.au](http://www.and.org.au) — The Australian Network on Disability offers advice from other employers.
- [www.australiandisabilityenterprises.com.au](http://www.australiandisabilityenterprises.com.au) — Australian Disability Enterprises contains details of quality products and services to assist your procurement choices.

If you would like to obtain additional copies of this document or a copy of this document in another format please contact National Mailing Marketing by phone on 1800 050 009 or TTY 1800 555 677.

# Attachment A: Sample Disability Action Plan

## Introduction from the CEO

## Introduction from the senior champion/s

## Business case snapshot

This section should include information such as:

- ▶ why a Disability Action Plan is important
- ▶ what the business is doing now
- ▶ any market share the business is missing out on.

## Summary of audit outcomes

## Case studies

This section could include case studies of your customers and employees to provide an overview of your current situation.

## Key goals and targets

This section should include your business's key short-, medium- and long-term goals and targets. For example:

- ▶ **Employment:** By 2013, 10 per cent of our workforce will be people with disability.
- ▶ **Policies for carers:** By 2013 we will have flexible leave in place for carers.
- ▶ **Physical access:** By 2015, 90 per cent of our shopfronts will be accessible.
- ▶ **Communication barriers:** By January 2013 our online product website will conform to web accessibility standards. By June 2013, all products will be reviewed for plain English.
- ▶ **Purchasing from Australian Disability Enterprises (previously Business Services):** By July 2012, we will purchase all laundry and linen services from an Australian Disability Enterprise.

## Actions for change

This section should include barriers to access, timelines for improvement, costs, responsibility and accountability. For example:

Barrier to access	Timelines for improvement	Costs	Responsibility	Accountability
Lack of tactile and other indicators for people who are sight impaired.	Indicators in all our shop fronts by 2013	\$2,000 per shop front	John Smith, Property Services	Joan Smith, Manager Diversity

## Process for review

This section should include information on:

- who will conduct the review
- how the review will be undertaken and what the indicators will be
- details on the reporting cycle.

## Attachment B: Sample memorandum of understanding

[Insert provider name] is established to provide a National Disability Recruitment Coordination Service for employers across Australia. The provider has been awarded a contract by [insert business name] to provide various training and support services to large industry employers resulting in the placement of people with disability into employment.

[Business name] will partner with [agency] in this endeavour to ensure people with disability have access to available employment opportunities in our organisation.

**This memorandum of understanding (MOU) formalises the alliance between [provider] and [business].**

### The provider will:

- provide training and professional development on disability awareness to staff and their representatives
- circulate vacant positions to all Disability Employment Network (DEN) and Vocational Rehabilitation Service (VRS) providers
- pre-screen and assess applicants with disability and provide your organisation with a written profile outlining the applicants' support and workplace modifications requirements
- provide your organisation with relevant information regarding incentives and work subsidies
- coordinate disability service support to the new employee(s) as required
- provide support to new employees and your staff in resolving disability-related issues in the workplace
- provide advice and support regarding workplace modifications as required
- provide the infrastructure and administration support necessary to meet the roles and responsibilities under the MOU
- provide your staff with regular feedback reporting, indicating number of employment opportunities and successful applicants.

### The business will

- promote to HR managers and staff the benefits of employing people with disability and to promote [provider name] through the organisational structure
- forward possible job opportunities to [provider]
- coordinate employment and training support matters
- formally induct and provide ongoing support to new employees
- maintain records of disability employment performance and track applicants with a disability through established systems
- monitor compliance with industrial relations and occupational health and safety provisions and legislation
- provide feedback to the provider for unsuccessful candidates when requested
- plan to increase the level of recruitment for people with disability
- develop and implement regular review processes to assess the agreements effectiveness
- business can exit the MOU at any time by notifying [provider] in writing.

**In addition to the individual contributions listed above the partners agree to:**

- identify opportunities and develop the relationship between [provider] and [business].
- review the MOU and recruitment process 12 months after the date of this agreement.

**This agreement is made on the [date]** \_\_\_\_\_

**between [insert provider name]** \_\_\_\_\_ and

**[insert business name]** \_\_\_\_\_ .

If you would like additional copies of this document or a copy of this document in another format please phone National Mailing Marketing on **1800 050 009** or TTY 1800 555 677.



