



Disability Inclusion Action Plan 2022-2024

About the Australian Communications Consumer Action Network

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communications consumer organisation representing individuals, small businesses and not-for profit groups as consumers of communications products and services. ACCAN focuses on goods and services encompassed by the converged areas of telecommunications, broadcasting, the internet and online services, including both current and emerging technologies.

Our Vision

Communications services that are trusted, inclusive, accessible and available for all.

Our Mission

ACCAN's purpose is to:

- Represent consumers and the public interest, with particular attention to the needs of consumers for whom the market is not working;
- Inspire, inform, enable and equip consumers to act in their own interests; and
- Research emerging consumer communications issues to provide evidence-based policy advice.

As an organisation we:

- Act with courage.

- Operate openly.
- Be inclusive.
- Build relationships.
- Value people.

Our Strategic Direction

Four strategic pillars guide ACCAN's work.

- **Expanding Influence in an Evolving Communications Environment:** We work to broaden our impact and continue to serve as the voice on communications issues.
- **Leading Through Change and Reform:** We strive for effective policy and regulatory reform.
- **Consumers at the Heart of Everything We Do:** We work with consumers to effectively identify and represent their interests to deliver significantly improved outcomes.
- **Building Capability to Continually Enhance Our Impact:** We continue to strengthen our organisation to effectively adapt to meet future needs.

Through enacting our Disability Inclusion Action Plan, ACCAN commits to:

- Eliminate any discrimination based on disability, including against members or employees.
- Improve access, inclusion and participation for people with disability across the organisation.
- Comply with the Disability Discrimination Act and the UN Convention on the Rights of Persons with Disabilities.
- Be a model for how other organisations, especially not-for-profit organisations, can improve access for people with disability.
- Support industry to increase access for consumers with disability.

Introduction

ACCAN is proud that people with disability have always been considered an important focus of our organisation. ACCAN, founded in 2009, inherited many of the values of our predecessors, the Consumers Telecommunications Network and TEDICORE, both of which were active in promoting equal access for people with disability in the field of telecommunications. The work of ACCAN, as discussed in this Disability Inclusion Action Plan (DIAP), reflects these principles of equal access and meaningful inclusion of people with disability. By reinforcing these principles, ACCAN's DIAP makes explicit the tangible ways in which inclusion and access will be prioritised by all ACCAN staff and board members.

ACCAN is a not-for-profit, member-based organisation which values disability access. By valuing disability access, we ensure that disability related matters are included at the forefront of our planning processes. We want to be a model in this field, for other not-for-profits, as well as for business and government. Approximately 30 percent of ACCAN organisational members represent people with disability, and approximately 20 percent of people Australia have disability. As such, it is vital that the voices and experiences of people with disability are appropriately reflected in ACCAN's work, and that these members have equal access to all ACCAN events, consultations, submissions and other information.

ACCAN has successfully implemented and reported on previous Disability Action Plans, and has already demonstrated best practice disability inclusion in a number of ways. For instance:

- ACCAN staff have completed Easy English training provided by a reputable Easy English provider.
- ACCAN holds an annual Disability Advisory Forum, which represents the views of disability communities and informs ACCAN's policy positions, public statements and advice.
- ACCAN has a hearing loop available at our office and ensures a hearing loop is used at our conference, research events, meetings and other events as required.
- All of ACCAN's business cards feature Braille and large print.
- ACCAN ensures that Auslan interpreters and real-time captioning are available at our conference, research events, and Board and consultative meetings, as required.

This Disability Inclusion Action Plan will challenge ACCAN as an organisation to continue to provide best practice access, and to find further opportunities to improve. While the DIAP assigns responsibility to certain staff members for different outcomes, all ACCAN employees and board members have a crucial role to play in enabling access and inclusion. The DIAP Committee, comprised of staff members from across ACCAN's different teams, will oversee the implementation of the Plan, provide information, and support staff to meet these outcomes.

Note: In this document, hyperlinks provide links to further useful information.

Term used in this document	Definition
Audio description	A form of access for people who are blind or vision-impaired, consisting of a narrator talking through a presentation (for example, a DVD or theatre performance), describing what is happening on the screen during the natural pauses in the audio.
Auslan	Australian Sign Language, the language used by the Australian Deaf community.
CRPD	The United Nations Convention on the Rights of Persons with Disabilities is an international human rights convention that outlines the inherent human rights of all people with disability.
DIAP	Disability Inclusion Action Plan.
DAT	Document Accessibility Toolbar . A tool to support the creation of accessible documents in Microsoft Word.
DDA	The Disability Discrimination Act (1992) makes it unlawful to discriminate against someone with disability in all aspects of life, such as in employment, education, the provision of goods, services and facilities, and access.
Deafblind	A person who is Deafblind will have varying degrees of vision impairment and deafness/hearing impairment. Individuals have widely differing communication requirements, which can include spoken language, Auslan, hand-over-hand Auslan (in which the individual touches the hands of the signer in order to feel the movement) and tactile fingerspelling (in which the signer signs adapted letters of the alphabet into the individual's palm).
Disability Advisory Forum	An annual, standing advisory forum at which representatives from the disability sector advise ACCAN on the most important media and telecommunications issues for consumers with disability.
Easy English	Also called 'easy read', this is a form of writing which is "more accessible for people who have difficulty reading and understanding written information. It uses: clear, simple language; one idea per sentence; short sentences; direct language (readers are addressed as 'you'); pictures, logos or photographs to add meaning to the text; minimal punctuation." (Consumer Affairs Victoria)
Hearing loop	Also known as an audio loop or an audio induction loop. A loop of cable around a designated area, usually a room or a building, which allows a person who uses a hearing aid to more readily hear what a speaker is saying. Requires the use of a special microphone by each speaker.
Inclusive language	"Language that is respectful and promotes the acceptance and value of all people. It is language which is free from words, phrases or tones that demean, insult, exclude, stereotype, infantilise or trivialise people on the basis of their membership of a certain group or because of a particular attribute." (The University of Queensland)
Inherent requirements	"The essential duties of a job" (Australian Human Rights Commission). For example, an inherent requirement of a position with a supermarket may be to serve customers at a check-out, but it is not necessarily an inherent requirement to stand up while doing so; or an inherent requirement of a position with ACCAN might be the ability to use email, but it's not an inherent requirement that the email must be accessed visually.
Interpreter	A person qualified by the National Accreditation Authority for Translators and Interpreters (NAATI) to work between spoken English and another spoken language, or between English and Auslan. The minimum NAATI accreditation level is Paraprofessional (previously Level 2). Most ACCAN events will require the use of a Professional Auslan interpreter (previously Level 3).

Term used in this document	Definition
NRS	The National Relay Service is a phone solution for people who are Deaf or have hearing or speech impairment. ACCAN staff can use the NRS to call, or receive calls from , people who are Deaf or have hearing or speech impairment.
Plain English	Also called 'plain language', this is a form of writing that "involves writing clearly so readers can find, understand and use the information they need from one reading. The Plain English Foundation describes the key features as a combination of "clear, concise expression; an effective structure and good document design."" (Scope Australia)
RAP	A Reconciliation Action Plan is "a strategic document that supports an organisation's business plan. It includes practical actions that will drive an organisation's contribution to reconciliation both internally and in the communities in which it operates."" (Reconciliation Australia)
Real-time captioning	This enables people who are Deaf or have hearing impairment to read a transcript of the spoken word in real time, (usually) created by a stenographer and displayed on a computer screen or projected onto a larger screen. The captioner can be present or work remotely.
Reasonable adjustments	(In the employment context) Changes to a position (which do not impose unjustifiable hardship on an employer) which would allow a person with disability to perform the role – for example, the provision of screenreader technology would allow a person who is blind to use a computer; or the provision of a chair would allow a person with chronic back pain to sit down while serving customers at a supermarket checkout (Australian Human Rights Commission).
Screenreader	A technology which enables a person who is blind or vision-impaired to access written documents via an audio output and a computer.
Translator	A person qualified by the National Accreditation Authority for Translators and Interpreters (NAATI) to work between written English and another written language. There are also some Auslan interpreters and Deaf people who are experienced and skilled in translating written English into recorded Auslan, or vice versa.
Universal Design	A philosophy to ensure that practical issues such as accessibility for people are dealt with by an inclusive approach to the planning of products and services.
WCAG	Web Content Accessibility Guidelines , a set of guidelines on making web content accessible, primarily for people with disability.

ACCAN Disability Inclusion Action Plan

Objective 1: All staff and board members support an organisational culture that is responsive to the needs of people with disability

Outcome	Performance Indicators	Responsibility	Timeframe
ACCAN staff continue to develop disability-specific skills and knowledge	All staff and board directors receive disability awareness training upon induction, including an introduction to the NRS; skills in creating accessible documents using the Document Accessibility Toolbar; basic Sighted Guide skills; information about appropriate and inclusive language; and information about disability organisations and services.	Director of Inclusion; Digital Assets Manager	Induction of each new staff and board member
	ACCAN provides at least one disability-related training session annually for staff and board members. Conducted by people with lived experience, this may include topics such as general disability awareness, mental health awareness, or communication accessibility, and may also include presentations about their lived experiences.	Business Manager	Annually
	All staff members who wish to partake in additional accessibility and/or inclusion training are encouraged to apply to do so through ACCAN's professional development program.	Business Manager	Ongoing
	All permanent staff are aware of the accessible communications channels used by ACCAN. For instance, they know where to find information about the NRS to make and receive calls; and they have a general understanding of how to use the ACCAN SMS number.	All staff; Inclusion Team	Ongoing, with quarterly reminders
Disability issues are considered as part of mainstream ACCAN issues	All non-disability-specific policy submissions and research must consider disability issues.	Inclusion Team; Policy Team; Research Team	Ongoing
	ACCAN engages and consults regularly with people with disability and member organisations representing people with disability.	Inclusion Team; Policy Team	
	Information and feedback regarding disability (e.g. from ACCAN members) is made available to staff.	Inclusion Team	
	ACCAN subscribes to relevant member publications and relevant newsletters are shared with the team.	Inclusion Team	
Staff are well-informed about the DIAP, its purpose	The DIAP is included in ACCAN's general induction module.	Director of Inclusion; new staff	Induction of each new staff member

Outcome	Performance Indicators	Responsibility	Timeframe
and their role in delivering its outcomes	All staff participate in a DIAP refresher course, run by the DIAP Committee, to re-affirm the purpose of the DIAP and what staff responsibilities are in relation to the 2022-2024 DIAP.	All staff; DIAP Committee	By June 2022
	'DIAP updates' is a standing agenda item at staff meetings at least monthly; for the DIAP committee to provide a brief overview of progress.	Staff Meeting Co-ordinator; DIAP committee	Monthly staff meetings

Objective 2: ACCAN is an employer of choice for people with disability

Outcome	Performance Indicators	Responsibility	Timeframe
<p>ACCAN’s recruitment process is accessible, and people with disability are aware of and encouraged to apply for vacant positions at ACCAN</p>	<p>Jobs are designed with their Inherent Requirements in mind, and these are reflected in recruitment advertisements and position descriptions.</p>	<p>Management Team</p>	<p>Ongoing</p>
	<p>Recruitment advertisements note that ACCAN is an equal opportunity employer.</p>	<p>Business Manager</p>	
	<p>Recruitment processes inform all applicants that they may request Reasonable Adjustments to the interview and recruitment process, and this is reflected in the information package.</p>	<p>Business Manager</p>	
	<p>Recruitment advertisements note that ACCAN can be contacted via the NRS.</p>	<p>Business Manager</p>	
	<p>ACCAN notifies disability employment services of all vacancies to ensure that information about vacant positions at ACCAN is disseminated to people with disability who are seeking work.</p>	<p>Business Manager</p>	
<p>Reasonable Adjustments are undertaken to allow an employee with disability to perform the inherent requirements of their position</p>	<p>As part of induction for new managers, staff with supervisory responsibilities are informed about the Employment Assistance Fund.</p>	<p>Director of Inclusion</p>	<p>Ongoing</p>
	<p>Upon the acceptance of a job offer, supervisors undertake specific consultation with successful applicants about their Reasonable Adjustment requirements. Upon commencement of employment, supervisors will seek regular feedback and report back to the Management Team.</p>	<p>Supervisors; Management Team; Business Manager</p>	
	<p>Staff with disability are provided with Reasonable Adjustments in order to access ACCAN’s employee assistance program.</p>	<p>Staff who have specific requirements to discuss with their supervisor; Business Manager</p>	
<p>Consideration of training, interning and mentoring options for people with disability</p>	<p>Where budget is available, ACCAN will provide paid internship opportunities for people with disability.</p>	<p>Management Team</p>	<p>Ongoing</p>
<p>ACCAN is a safe, inclusive and welcoming work environment for people with disability</p>	<p>OHS and emergency procedures provide for appropriate assistance (if required) for people with disability (whether employees or visitors). All staff are made aware of these procedures at induction.</p>	<p>OHS Officer; Business Manager; Executive Assistant & Events Co-ordinator</p>	<p>Ongoing</p>

Outcome	Performance Indicators	Responsibility	Timeframe
	Internal social and team-building activities are accessible to all staff (this will be based on individual staff requirements – for example, venues may need to be physically accessible or Auslan interpreters may need to be provided).	All staff (The person organising an event is to liaise directly with staff to check requirements)	
	All internal documents are accessible for employees and conform to best practice accessibility.	All staff; Supervisors; DIAP committee	Ongoing, with quarterly reminders
	All office equipment (such as photocopiers, telephones, microwaves etc.) is as accessible as possible to ensure equity of access for all ACCAN staff. An audit will be performed to establish an upgrade plan to ensure the accessibility of all future purchases. All online and offline software environments will undergo rigorous testing to ensure accessibility for people with disability.	Management Team; Business Manager; Digital Assets Manager; Inclusion Team	Ongoing Audit and testing to be completed by December 2022

Objective 3: ACCAN's premises and events are accessible

Outcome	Performance Indicators	Responsibility	Timeframe
People with disability are able to access ACCAN's premises	As per ACCAN's event guidelines, prior to attending the ACCAN office visitors are provided with accessible information to help them easily find the office, including: <ul style="list-style-type: none"> • ACCAN's street address, • Plain English instructions for locating the lift and office, and • Information about nearby accessible parking. 	Meeting organiser; Executive Assistant & Events Co-ordinator	Ongoing
	Visitors to ACCAN can use telecommunications, with ACCAN's office continuing to offer access, via laptop, to some types of National Relay Service calls. ¹	Digital Assets Manager; Executive Assistant & Events Co-ordinator	
	ACCAN will perform an audit of its existing premises against accessible building standards to inform future decisions regarding the location of ACCAN's premises.	Business Manager; Inclusion Team; CEO	December 2022, ongoing monitoring required
ACCAN visitors or event attendees receive support or assistance where required	Visitors to the ACCAN office, and attendees at ACCAN events, are asked if they would like assistance, and if so, what kind of assistance. If assistance is required, an ACCAN staff member will assist to the best of their ability. This assistance may include, for example, guidance to toilets; guidance into/out of the office; or guidance to/from transport but does not extend to performing personal care duties.	Meeting organiser; Executive Assistant & Events Co-ordinator (or other delegated staff member)	Ongoing
	Upon request, consideration is given to other types of support (e.g. free conference registration for a support person) that may enable a person's attendance at an ACCAN meeting or event. This may also include using technologies such as Video-Conferencing or online captioning facilities to ensure a person's maximum participation.	Meeting organiser; Executive Assistant & Events Co-ordinator	
ACCAN events, including conferences, consultations	ACCAN only uses event venues that have accessibility features (e.g. with ramps, including to the stage and lifts, and with hearing loops).	Executive Assistant & Events Co-ordinator	Ongoing

¹ The types of NRS calls available at ACCAN are reliant upon the technology available – for instance, ACCAN no longer has a TTY and is therefore unable to provide visitors access to TTY NRS calls.

Outcome	Performance Indicators	Responsibility	Timeframe
and other meetings, are accessible for attendees with disability	Auslan interpreters, Deaf Relay interpreters and other interpreters for people who are Deafblind, are provided for public ACCAN events upon request (provided sufficient notice is given).	Executive Assistant & Events Co-ordinator	
	Real-time captioning is provided at public ACCAN events upon request (provided sufficient notice is given).	Executive Assistant & Events Co-ordinator	
	When choosing event venues and planning event programs, consideration is given to factors affecting people with intellectual disability.	Executive Assistant & Events Co-ordinator	
	ACCAN event documents (including meeting documents) are accessible for people with disability. Documents are provided electronically ahead of the scheduled meeting/event, upon request (with sufficient notice).	Meeting or event organiser	
	Speakers at ACCAN events are advised about the needs of audience members with disability.	Executive Assistant & Events Co-ordinator	
	As per ACCAN's event guidelines, where ACCAN requests a meeting with a Deaf organisation or individual member, ACCAN will, in most cases, cover interpreting costs and book the interpreter. Where another organisation requests a meeting, payment towards interpreting, and interpreter booking, will be discussed on a case by case basis.	Management Team	
Accommodation organised by ACCAN is accessible upon request	ACCAN's travel policy is inclusive of the varied needs of people with disability.	Business Manager; CEO	Ongoing

Objective 4: ACCAN demonstrates best practice in accessible communications

Outcome	Performance Indicators	Responsibility	Timeframe
ACCAN uses appropriate and inclusive language	ACCAN's website, media releases and publications use language inclusive of and respectful to people with disability.	All staff	Ongoing
ACCAN's website and online assets are accessible to people with disability	Relevant staff members have the opportunity to receive training in best practice accessible communications issues through ACCAN's professional development program.	Management Team; Digital Assets Manager; Media and Communications Manager	
	ACCAN's website conforms to WCAG 2.1 Level AA, and ACCAN's website templates conform to WCAG 2.1 Level AAA.	Digital Assets Manager	Ongoing
	ACCAN social media follows best practice in accessibility. Alt text is used for social media images, and the accessibility of external links and videos is carefully considered prior to posting or linking to these from ACCAN accounts.	Media and Communications Manager	
	All ACCAN videos are available with audio description of visual content, or text descriptions when audio description is not possible.	Disability Policy Officer; Media and Communications Manager; Digital Assets Manager	
	All ACCAN videos are available with captions and/or transcript.	Disability Policy Officer; Media and Communications Manager; Digital Assets Manager	
ACCAN is contactable via a range of accessible methods	Information about contacting ACCAN via the NRS is on the ACCAN website.	Digital Assets Manager	Ongoing
	Information about contacting ACCAN via SMS is on the ACCAN website.	Digital Assets Manager	
	ACCAN's contacts database includes provision to note known contact preferences and access needs (for example, if and how a person can be contacted via the NRS). The database will be updated as ACCAN becomes aware of any contact preferences and access needs, and any information gathered will be treated as confidential.	Digital Assets Manager; Consumer Engagement and Membership Officer	

Outcome	Performance Indicators	Responsibility	Timeframe	
Public documents created by ACCAN are accessible	An accessible version of all public ACCAN documents will always be made available. All Microsoft Word documents will be accessible, and PDFs will be provided in an accessible format where ACCAN has direct control over the PDF design process and source documents.	All staff	Ongoing	
	ACCAN will provide plain English summaries and, where possible, Easy English summaries of all future consumer information resources. Legacy public documents will also be made available in accessible formats upon request, on a case by case basis.	Disability Policy Officer; Media and Communications Manager; Digital Assets Manager		
	ACCAN will provide Auslan versions of consumer information specifically relevant to the Deaf community, and other information where practicable.	Disability Policy Officer; Media and Communications Manager; Digital Assets Manager		
	ACCAN's 2022-2024 DIAP will be made available in Easy English.	Disability Policy Officer; Digital Assets Manager	By June 2022	
	The ACCAN Grant Scheme application process and grants management process are accessible and inclusive (e.g. application forms and processes are accessible).	Grants and Research Manager	Annual	

Objective 5: ACCAN supports products and services which improve outcomes and opportunities for people with disability

Outcome	Performance Indicators	Responsibility	Timeframe
<p>ACCAN purchasing policies will adhere to Universal Design principles and will support employment opportunities for people with disability</p>	<p>Where possible, ACCAN will purchase products and services, including training, which conform to Universal Design principles – that is, can be used by people both with and without disability.</p>	<p>Business Manager; Digital Assets Manager</p>	<p>Ongoing</p>
	<p>Where possible, ACCAN will make purchases from disability organisations that support the employment of people with disability (e.g. Australian Disability Employment Services or grassroots organisations ethically employing people with disability).</p>	<p>Business Manager</p>	
<p>The organisations with which we do regular business will be expected to meet ACCAN accessibility standards</p>	<p>ACCAN ensures clear guidance is provided to ensure the organisations with which we do business (including grant recipients and organisations performing commissioned research) meet ACCAN’s accessibility standards where relevant to their contracted outputs.</p>	<p>Management Team</p>	<p>Ongoing</p>

Objective 6: The DIAP is integrated into ACCAN's governance and is aligned with ACCAN's strategic plan

Outcome	Performance Indicators	Responsibility	Timeframe
ACCAN supports and sustains the DIAP at all levels of operation	The Board approves the DIAP.	Board; CEO	March 2022
	The DIAP is an annual item on Board meeting agendas.	Board; Director of Inclusion	Annually
	A DIAP review and governance committee oversees implementation of the DIAP and tracks actions. The review will not only evaluate the implementation of the DIAP, but will also inform the development of the next DIAP to ensure sustained progress.	DIAP committee	6 monthly
	The DIAP works in parallel with the RAP, with both action plans included as standing agenda items at staff meetings at least monthly.	Director of Inclusion	Monthly staff meetings