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Disability Action Plan 2015 - 2017

# 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 on-line services, including both current and emerging technologies.

## Our Vision

Communications services that are available, accessible and affordable for all consumers.

## Our Mission

ACCAN’s mission 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.
* Research emerging consumer communications issues to provide evidence-based policy advice.

## Our Values

As an organisation we will:

* Act with courage, integrity and independence.
* Operate openly, efficiently, and effectively.
* Be accessible and inclusive, consistent with the high value we place on diversity.
* Recognise that building relationships with members, community groups, industry, regulators, and government is critical to achieving our goals.
* Value volunteers, staff and members for their crucial role in our organisation.

# ACCAN Goals and Activities

1. Improved accessibility, affordability and availability of communications services to all consumers;
2. Better informed consumers with access to Australian information and communications technology resources;
3. A strong, co-ordinated voice which uses our diversity as a point of strength for communications consumers, nationally and internationally;
4. Effective representation of communications consumers interests to Government, regulators and the industry in the development of policy, legislation and industry practices;
5. Inclusive consultation with stakeholders to identify areas and priorities for industry and/or regulatory responses;
6. Robust research to support evidence based policy development and consumer education programs;
7. Meaningful participation in regulatory and co-regulatory activities including industry codes, standards and guidelines;
8. Outreach, campaigns and activities that involve consumers in the communications arena;
9. Enhanced capacity for consumer representatives through information seminars, training and international engagement;
10. Openness, transparency and inclusion of all parties interested in representing consumers on communications issues.

# ACCAN’s Disability Action Plan aims to:

* Eliminate any discrimination based on disability, including against members or employees.
* Comply with the Disability Discrimination Act and the UN Convention on the Rights of Persons with Disabilities.
* Improve access, inclusion and participation for people with disability in ACCAN as a whole.
* Be a model for how other organisations, especially not-for-profit organisations, can improve access for people 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. Approximately 30% of ACCAN organisational members represent people with disability.

ACCAN is a not-for-profit, member-based organisation, which values disability access. We want to be a model in this field, for other not-for-profits, as well as for industry and government.

Prior to the launch of this Disability Action Plan, ACCAN already demonstrated best practice in a number of ways, including:

* Standing Advisory Committee on Disability Issues (SACDI), representing the views of disability communities to ACCAN. This has now been replaced by the Disability Advisory Forum to be held annually.
* Physically accessible premises, including boardroom, toilet and lifts, and including installation of our own audio loop.
* Braille on all ACCAN business cards.
* Braille and audio in lifts, including Braille on the up/down buttons on the outside of the lift, and side of door opening to identify the floor.
* Auslan/English interpreters and real-time captioning at our conference, research events and at Board and consultative meetings.
* Audio loop at our conference, research events, meetings and other events, as required.
* TTY installed in ACCAN premises for inbound and outbound calls.
* Access at ACCAN premises to VRS and captioned telephony for Deaf or hearing-impaired visitors.

ACCAN hopes that this Disability Action Plan will challenge us as an organisation to continue to provide best practice access, and to find further opportunities to improve.

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

# Glossary

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| DAP | Disability Action Plan |
| AND | [Australian Network on Disability](http://www.and.org.au/). A not-for-profit organisation resourced by its members to advance the inclusion of people with disability in all aspects of business |
| 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 |
| Audio loop | Also known as 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 |
| Auslan | Australian Sign Language, the language used by the Australian Deaf community |
| [CapTel](http://www.aceinfo.net.au/index.php?option=com_content&view=article&id=6&Itemid=17) | A phone handset which allows simultaneous access to real-time captions for a person with a hearing impairment, while listening to the other party speaking. A proprietary term – the generic term is ‘captioned telephony’ |
| 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) |
| [Easy English](http://www.consumer.vic.gov.au/CA256EB5000644CE/page/Resources+and+education-Consumers+with+a+disability-Easy+English+Factsheets?OpenDocument&1=955-Resources+and+education~&2=070-Consumers+with+a+disability~&3=050-Easy+English+Factsheets~) | Also called ‘easy language’, 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 Victoria) |
| [Inclusive language](http://www.equity.uts.edu.au/language/inclusive/disabilities.html) | “Inclusive language is language that does not demean, insult, exclude, stereotype, or trivialise people on the basis of their disability, race or gender. It means avoiding terminology that may be offensive or portray any group in a stereotypical way.” ([ADCET](http://www.adcet.edu.au/Cats/Policy_and_Administration/Inclusive_Language.chpx)) |
| Inherent requirements | “The essential activities of a job” ([Australian Human Rights Commission](http://www.humanrights.gov.au/info_for_employers/fact/disability.html)). 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 |

# Glossary – cont.

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| 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/English interpreter (previously Level 3) |
| NRS | [National Relay Service](http://www.relayservice.com.au), a phone solution for people who are Deaf, hearing-impaired or speech-impaired. ACCAN staff can [use the NRS to call, or receive calls from, people](http://www.relayservice.com.au/making-a-call/calling-a-nrs-user/) who are Deaf, hearing-impaired or speech-impaired |
| Plain English | Also called ‘plain language’, this is a form of writing which uses “Clear straightforward expression, using only as many words as are necessary. It is language that avoids obscurity, inflated vocabulary and convoluted sentence construction. It is not baby talk, nor is it a simplified version of the English language.” (Eagleson, Robert D. 1990 Writing in Plain English. AGPS. Canberra) |
| PWD | People with disability |
| RAP | Reconciliation Action Plan, a “[tool to help (an) organisation build positive relationships between Indigenous and non-Indigenous people](http://www.nswreconciliation.org.au/Default.aspx?PageID=1780208&A=SearchResult&SearchID=1229236&ObjectID=1780208&ObjectType=1)” ([Reconciliation Australia](http://www.reconciliation.org.au/home/reconciliation-action-plans/what-is-a-rap-)) |
| Real-time captioning | This enables people who are hearing-impaired or Deaf 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](http://www.humanrights.gov.au/info_for_employers/fact/disability.html) | (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 |
| Relay interpreter | A Deaf person who is skilled in working with Deaf clients who are: fluent in a sign language other than Auslan; or who have minimal language skills; or who are Deafblind. The relay interpreter usually works in a team with an Auslan interpreter |
| SACDI | Standing Advisory Committee on Disability Issues, a body which previously advised ACCAN on disability issues |
| Screenreader | A technology which enables a person who is blind or vision-impaired to access written documents via an audio output and a computer |

# Glossary – cont.

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| 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/English interpreters and Deaf people who are experienced and skilled in translating written English into recorded Auslan, or vice versa |
| TTY | Telephone typewriter, or textphone. A landline phone used by people who are Deaf, hearing-impaired or speech-impaired, either to call another TTY user, or to call a non-TTY user via the NRS |
| 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](http://www.w3.org/TR/WCAG20/) | Web Content Accessibility Guidelines, a set of guidelines on making web content accessible, primarily for people with disability |
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# ACCAN Disability Action Plan

## Objective 1: All staff have relevant awareness, attitudes and skills about people with disability

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Staff have good disability awareness | All permanent staff have received disability awareness training. This should include awareness of the NRS and DAP; skills in creating accessible documents; and disability organisations and services | Individual’s supervisor | Induction of each new staff member |
| ACCAN is NRS-friendly | Information about contacting ACCAN via the NRS is on the ACCAN website | ICT Officer | Launch of new ACCAN website |
| Staff are able to make and receive a call via the NRS | All staff | Induction of each new staff member |
| ACCAN is accessible via SMS | Information about contacting ACCAN via SMS is on the ACCAN website | ICT Officer | Ongoing |
| Staff are able to send an SMS via ACCAN email | All staff | Ongoing |
| ACCAN staff continue to develop disability-specific skills and knowledge, including basic guiding skills | ACCAN invites at least one disability organisation annually to provide training for staff | Business Manager | Annually |
| ACCAN is accessible for TTY users | All admin staff are able to receive a call using the TTY  (Note: no need to know how to make an outbound call, as staff can contact a TTY user via the NRS) | Business Manager | Induction of each new admin staff member |
| Disability issues are considered as part of mainstream issues | Non-disability-specific submissions/research consider disability issues where relevant | Policy team; Research team | Continuous |

## Objective 1: All staff have relevant awareness, attitudes and skills about people with disability – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Staff are well-informed about DAP | Included in induction module | All staff | Induction of each new staff member |
| The DAP committee updates staff regularly at staff meetings | DAP Committee | Six-monthly |
| Applications from staff members who wish to study Auslan will be considered as part of ACCAN’s professional development program | Business Manager | Ongoing |
| Disability information (e.g. from ACCAN members) is made available to staff | ACCAN subscribes to relevant member publications and relevant newsletters are shared with the team | Disability Policy Advisor | Ongoing |
| Relevant research and grant project material is disseminated to staff | Materials are widely available; briefing sessions or materials available; collation of external resources for staff to review | Director of Operations;  Grants and Research Officer | Ongoing |

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

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Jobs are designed with inherent requirements in mind | Recruitment advertisements and position descriptions reflect Inherent Requirements | Business Manager | Ongoing |
| ACCAN’s recruitment process is accessible | Recruitment advertisements note that ACCAN is an equal opportunity employer | Business Manager | Ongoing |
| Recruitment processes inform all applicants that they may request Reasonable Adjustments to the interview and recruitment process, and this be reflected in the information package | Business Manager |
| Where possible, recruitment advertisements note that ACCAN can be contacted via the NRS | Business Manager |
| At least one disability employment service per recruitment drive is notified of the vacancy/s (call **13 17 15 to find a local Job Services Australia provider)** | Business Manager |
| Reasonable Adjustments are undertaken to allow an employee with disability to perform the inherent requirements of their position | Staff with supervisory responsibilities are familiar with the [Employment Assistance Fund](http://jobaccess.gov.au/Employers/%20Financial_help_and_wages/Workplace_modifications_and_adjustments/Pages/home.aspx) | Supervisors | Ongoing |
| Supervisors will undertake specific consultation at the commencement of employment about Reasonable Adjustment requirements, seek regular feedback and report back to Management Group | Supervisors;  Management Group | Ongoing |

## Objective 2: ACCAN is an employer of choice for people with disability – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Consideration of training, interning and mentoring options for PWD | Traineeship/internship options are explored with [AND](http://www.and.org.au/content/category/2/6/23/)  and the [Department of Education, Employment and Workplace Relations](http://www.deewr.gov.au/Skills/Programs/PreVoc/ADAP/Pages/default.aspx) | Management Group | Ongoing |
| ACCAN procedures promote a safe work environment for PWD | OHS and emergency procedures provide for [appropriate assistance (if required) for PWD](http://jobaccess.gov.au/Employers/Tool_kits/Checklists/Pages/Evacuation_and_emergency.aspx) (whether employees or visitors) | OHS Officer; Business Manager;  Executive Assistant & Events Co-ordinator | Ongoing |
| ACCAN is a welcoming place of employment for PWD | 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 to liaise directly with staff to check requirements) | Ongoing |
| Staff with disability will be provided with Reasonable Adjustments in order to access employee benefits program | Staff who have specific requirements to discuss with their supervisor | Ongoing |
| Internal documents are accessible for employees with vision impairment | All internal documents will conform to best practice accessibility. | All staff; Supervisors | New staff: induction |
| DAP Committee | Continuing staff: Reminder each 6 months |

## Objective 3: ACCAN’s premises and events are accessible

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Toilets at ACCAN premises are accessible to people who are blind or who have a vision impairment, including people who also have a physical disability | Braille on:   * Male and female toilets on Level 4 * Accessible toilet on Level 2 | Business Manager | Ongoing |
| Visitors/event attendees who require assistance will be provided with it | Attendees at ACCAN events will be asked if they would like assistance, and if so, what kind of assistance | Executive Assistant & Events Co-ordinator (or other delegated staff member) | Ongoing |
| If a person with disability says that they wish to receive assistance, an ACCAN staff member will be rostered on to assist – for example, with catering; guidance to toilets; guidance into/out of venues; guidance to/from transport |
| Visitors to ACCAN can use telecommunications | ACCAN office will continue to have access to:   * National Relay Service | Executive Assistant & Events Co-ordinator; ICT Officer | Ongoing |
| Visitors can easily find ACCAN’s office | Website includes map to show where ACCAN is located, including:   * Plain English instructions for locating lift and office for people with a vision impairment * information about nearby accessible parking | ICT Officer; Executive Assistant & Events Co-ordinator | Continuous |

## Objective 3: ACCAN’s premises and events are accessible – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| ACCAN events are accessible to people who are Deaf/hearing-impaired | Auslan/English interpreters, and interpreters for people who are Deafblind, are provided upon request (with sufficient notice) for public events | Executive Assistant & Events Co-ordinator | Ongoing |
| Requests for relay interpreters (other than Deafblind) at public events are considered on a case by case basis (with sufficient notice) |
| Real-time captioning at public events provided upon request (with sufficient notice) |
| Use of audio loops:   * Priority is given to venues which have an audio loop when sourcing event venues * The loop at ACCAN premises will be used when required * The ACCAN loop is portable and will be used in venues which do not have a loop, if required, where the venue is in Sydney * If a conference venue does not have a loop and is not in Sydney, a loop will be rented, if required * The loop at ACCAN premises will be used when required * Appropriate microphones will be used by all speakers at ACCAN events which are looped (and this will be explained where appropriate) |
| 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. | CEO | Ongoing |

## Objective 3: ACCAN’s premises and events are accessible – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| ACCAN event documents are accessible to people who are blind/vision-impaired | Where appropriate and possible, documents are provided electronically in advance to attendees who are blind/vision-impaired, upon request | Meeting organiser;  Executive Assistant & Events Co-ordinatorAdmin | Ongoing |
| ACCAN events are accessible to people with a mobility disability | Priority is given to venues which are physically accessible (e.g. ramps, including to the stage, lifts, etc) when sourcing event venues | Executive Assistant & Events Co-ordinator | Ongoing |
| ACCAN events are accessible to other PWD | Consideration is given to other access support (e.g. free conference registration for support person) upon request |
| When choosing event venues, and planning event programs, consideration will be given to [factors affecting people with intellectual disability](http://www.includeme.org.au/) where appropriate |
| ACCAN presentations are accessible to PWD | Speakers at ACCAN events will be advised, where appropriate, about needs of audience members with disability | Executive Assistant & Events Co-ordinator | Ongoing |
| Accommodation organised by ACCAN is accessible | ACCAN’s travel policy to reflect the needs of people with disability | Business Manager; CEO | Ongoing |

## Objective 4: ACCAN demonstrates best practice in accessible communications

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| ACCAN’s website is accessible to people with disability | ACCAN’s website conforms to WCAG 2.0 Level AA | ICT Officer | Continuous |
| Investigate possibility of upgrading ACCAN’s website to conform to WCAG 2.0 Level AAA, and proceed with the implementation of some of all of Level AAA where feasible | ICT Officer | Ongoing |
| Documents are available in both PDF and Word versions | All staff | Ongoing |
| ACCAN will provide Auslan versions of most relevant consumer information and policy positions | ICT Officer; Disability Policy Adviser; Public Relations Officer | Ongoing |
| ACCAN’s contacts database includes provision to note contacts preferences for people with disability (for example, if and how a person can be contacted via the NRS) | ICT Officer | Ongoing |
| Public documents created by ACCAN are accessible | Public ACCAN documents will be:   * Available in both Word and PDF | All staff; ICT Officer | Ongoing |
| * Available in alternative formats upon request, on a case by case basis informed by the standard of Reasonable Adjustment | Business Manager | Ongoing |
| ACCAN uses appropriate and inclusive language | ACCAN’s website, media releases and publications use language inclusive of and respectful to PWD | All staff | Ongoing |
| Publications are accessible to people with intellectual disability | At least two disability-specific ACCAN publications per year include an Easy English summary | Disability Policy Adviser; Public Relations Officer | Ongoing |

## Objective 4: ACCAN demonstrates best practice in accessible communications – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Videos are accessible to people with sensory disability | All ACCAN videos will be available with audio description, or transcription when more appropriate, of relevant visual content. | Disability Policy Adviser;  Public Relations Officer; ICT Officer | Ongoing |
| All ACCAN videos are available with captions or transcript | Disability Policy Adviser;  Public Relations Officer; ICT Officer | Ongoing |
| ACCAN Grant Scheme application process and grants management process are accessible and inclusive | Application forms and processes are accessible | Director of Operations | Annual |
| All ACCAN social media is best practice in accessibility | Alt text is included for images when the social media platform allows for this | Social Media and Digital Communications Officer; Public Relations Officer | Ongoing |

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

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Where possible, all products purchased should adhere to universal design principles | 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 | Business Manager; ICT Officer | Ongoing |
| Purchasing policies will support employment opportunities for people with disability | ACCAN will aim to make at least two purchases annually from organisations which have disability-friendly employment practices (e.g. [Australian Disability Employment services](http://www.australiandisabilityenterprises.com.au/~/link.aspx?_id=C0411165A94D44C69C509252005DC648&_z=z), members of the [Australian Network on Disability](http://www.and.org.au/content/category/1/11/50/)) | Business Manager | Ongoing |
| The organisations with which we do regular business will be encouraged to meet ACCAN accessibility standards | ACCAN will send copies of our DAP to our travel agent, and our suppliers of office supplies, IT, telecommunications and power, encouraging these organisations to develop their own DAP (if they have not already done so) | CEO | Continuous |

## Objective 6: Accessibility is included in ACCAN’s governance and accountability structures

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| ACCAN consults regularly with PWD | Engagement with member disability organisations | Disability Policy Adviser | bi-annual contact with each organisation |
| When appropriate, ACCAN consults in the broader disability field, particularly amongst ACCAN members | As required |
| Actions required by the DAP are managed and reviewed | A DAP review and governance committee oversees implementation of the DAP, and tracks actions | DAP Committee | Six monthly |
| Improved engagement with member organisations which represent PWD | ACCAN CEO attends at least one event per year with or hosted by an ACCAN member which represents PWD | CEO | Annually |
| Improved engagement with member organisations which represent Indigenous PWD | Formal engagement with Indigenous disability organisations | Disability Policy Adviser | Annually |
| ACCAN to liaise with Indigenous disability groups to outline benefits of ACCAN membership | Disability Policy Adviser | Ongoing |

## Objective 6: Accessibility is included in ACCAN’s governance and accountability structures – cont.

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| **Outcome** | **Performance Indicators** | **Responsibility** | **Timeframe** |
| Improved engagement with member organisations which represent people with disability of non-English-speaking background | Formal engagement with CALD disability organisations | Disability Policy Adviser | Annually |
| ACCAN to liaise with CALD groups, including CALD disability groups, to outline benefits of ACCAN membership | Disability Policy Adviser | Ongoing |
| The DAP works in parallel to the RAP | DAP and RAP are included on quarterly staff meeting agenda | DAP Committee;  RAP Committee | At each staff meeting |
| The DAP is integrated into ACCAN’s governance and aligned with ACCAN’s strategic directions | The Board approves the DAP | Admin team | With each new DAP |
| The DAP is an annual item on Board meeting agendas | Admin team | Annual |
| ACCAN Grant Scheme application process and grants management process are accessible and inclusive | Application forms and processes are accessible | Director of Operations | Annual |