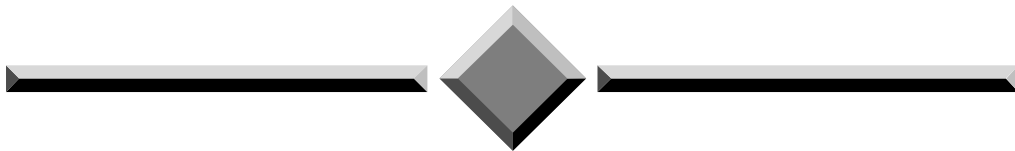




**DEPARTMENT FOR FAMILIES
AND COMMUNITIES**

DISABILITY ACTION PLAN

2005 -2007



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1.0 Introduction

- 1.1 The Department for Families and Communities has made a commitment to develop a Disability Action Plan. This plan will assist in the implementation of the requirements of the *Commonwealth Disability Discrimination Act [1992] (DDA)* and the South Australian Government's policy, *Promoting Independence: Disability Action Plans for South Australia*.
- 1.2 The DDA recognises the rights of people with disabilities to have similar opportunities as other members of the community to access and participate in all facets of community life. It makes discrimination on the grounds of disability unlawful and protects the rights of people with disabilities and their associates to freedom from discrimination.
- 1.3 The DDA contains requirements for new building construction and renovations to existing buildings to be designed to accessible standards. The Act requires that the provision of goods or services that are available to the general public must also be accessible to people with disabilities. The DDA also covers effective communication with people with disabilities, eligibility criteria that may restrict or prevent access, and requires reasonable modifications of policies and practices that may be discriminatory.
- 1.4 The purpose of this Action Plan is to provide direction for the Department for Families and Communities in developing strategies and actions to eliminate practices which discriminate against people with disabilities.
- 1.5 The Action Plan provides a framework for the Portfolio, its agencies and service providers to address discrimination against people with disabilities who use the services offered by the Department for Families and Communities or are employees within the Department.
- 1.6 Accountability for the implementation of actions will occur at all levels. This will include specific initiatives at Department level as well as service provider and local strategies which improve collaboration and integration in decision making processes and planning of services.

2.0 The Department for Families and Communities

- 2.1 The Department for Families and Communities was formed in July 2004. Prior to this it was part of the former Department of Human Services which was decommissioned on 30 June 2004.
- 2.2 The overarching objective of the Department for Families and Communities and its agencies is to work together to provide integrated services which protect families and children's well being, support young people and promote the well being of communities in which we live. The department has a broad mandate to administer policy and provide services in the areas of:
- Ageing
 - Child Protection
 - Community Services
 - Disability
 - Housing
 - Women's Services
 - Youth
 - Family
- 2.3 Central Office of the Department for Families and Communities has the following roles and responsibilities:
- to ensure that publicly funded community services are strategically planned and developed, appropriately resourced and work harmoniously and effectively within 'whole of government' policies and administrative requirements;
 - to be accountable within government for the overall performance of the publicly funded South Australian community services system;
 - to provide high level support to the Minister for Families and Communities and the Chief Executive of the Department;
 - to allocate funds to providers of community services and programs on a properly planned and considered basis taking account of population requirements, government policy, defined outcomes and availability of resources.
- 2.4 The DFC draft Strategic Agenda recognises there are disadvantaged people and communities who have poorer housing, health, education and opportunities. DFC targets efforts to develop specific prevention and intervention strategies across the department to address inequalities in the State and raise the standard of living through improved access to services.
- 2.5 The Department for Families and Communities plays the lead role in coordinating and monitoring the Whole of Government Promoting Independence Strategy and should be an exemplar in implementing its Disability Action Plan.

3.0 What is Disability

- 3.1 The definition of "disability" in the *DDA* covers a range of disabilities, which are physical, intellectual, psychiatric, sensory and neurological. A disability can affect a person's capacity to communicate, interact with others, learn or get about independently. It covers disfigurement and the presence in the body of an organism capable of causing disease. It is usually permanent or it may be episodic.
- 3.2 The *DDA* covers a disability which a person has now, had in the past (eg a past episode of mental illness), may have in the future (eg a disability that might develop because of a family history) or are believed to have (eg if it is believed that a person is HIV-positive).
- 3.3 Under Section 4 of the *DDA*, disability means:
- a. total or partial loss of the person's bodily or mental functions; or
 - b. total or partial loss of a part of the body; or
 - c. the presence in the body of organisms causing disease or illness; or
 - d. the presence in the body of organisms capable of causing disease or illness; or
 - e. the malfunction, malformation or disfigurement of a part of the person's body; or
 - f. a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
 - g. a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour.

It includes a disability that:

- h. presently exists; or
- i. previously existed but no longer exists; or
- j. may exist in the future; or
- k. is imputed to a person.

4.0 Legislative and Policy Framework

- 4.1 This Disability Action Plan acknowledges the context set by international conventions, legislation, and national and state policies for the recognition of human rights and more effective participation and independence for people with disabilities in the community. These are:
- Adoption of the Universal Declaration of Human Rights by the UN General Assembly in **1948**
 - UN Declaration on the Rights of Mentally Retarded Persons in **1971**
 - United Nations International Declaration on the Rights of Disabled Persons **1975**;
 - UN General Assembly proclaims 1981 the International Year of Disabled Persons **1981**

- United Nations International Covenant on Civil & Political Rights **1966 & 1989**;
- United Nations International Covenant on Economic, Social & Cultural Rights **1966**;
- 159 ILO Convention on Vocational Rehabilitation and Employment (Disabled Persons) **1983**
- United Nations Standard Rules on the Equalisation of Opportunities for Persons with Disabilities **1993**;
- Human Rights and Equal Opportunity Commission Act **1986**;
- Commonwealth Disability Services Act **1986**
- The Commonwealth Disability Discrimination Act **1992**;
- South Australian Disability Services Act **1993**
- Promoting Independence: Disability Action Plans for South Australia **2000**
- Department for Families and Communities Equity of Access to Health Services for People with Disabilities: Policy Statement & Strategic Directions October **2001**.
- UN General Assembly adopts Resolution 56/168, calling for the establishment of an Ad Hoc Committee for an international human rights treaty for people with disabilities **December 2001**

4.2 The *Commonwealth Disability Discrimination Act (DDA) 1992* sets the framework for the development of Action Plans. The Objects of the *DDA* are to:

- (a) eliminate, as far as possible, discrimination against persons on the ground of disability in the areas of;
 - (i) work, accommodation, education, access to premises, clubs and sport; and
 - (ii) the provision of goods, facilities, services and land; and
 - (iii) existing laws; and
 - (iv) the administration of Commonwealth laws and programs; and
- (b) ensure that people with disabilities have a right to equal treatment before the law; and
- (c) promote community understanding that people with disabilities have the same fundamental rights as the rest of the community.

4.3 The *DDA* contains five strategies for achieving these Objects:

- discrimination on the basis of disability is made unlawful;
- independent investigation and conciliation or determination of complaints about discrimination;
- development of Disability Standards;
- **development of Disability Action Plans**;
- review of discriminatory laws by the Human Rights and Equal Opportunity Commission.

5.0 Why a Disability Action Plan is Required

- 5.1 The aim of this Plan is to provide an overarching framework to assist service providers and DFC Central Office to strategically eliminate practices that discriminate. The focus of this framework will be on improving access to mainstream services and increasing participation and employment opportunities for people with disabilities. This Plan has adopted the five key outcome areas contained within the *Promoting Independence* strategy and added another, namely policy.
- 5.2 It is known that many people with disabilities experience problems when accessing services or information and in gaining employment opportunities. While physical access is an obvious barrier, communication and attitudinal barriers can have an even greater impact. Communication barriers include a lack of information in alternative and appropriate formats about a service or public campaign. Attitudinal barriers include negative attitudes, stereotypes and assumptions held by some service providers, planners and policy makers.
- 5.3 To ensure employment practices and service delivery are responsive to the individual differences and needs of people with disabilities, there is a need for improved disability awareness and training amongst service providers, planners and policy makers. This plan acknowledges and accepts the Disability Awareness and Discrimination Training Framework, as launched in December 2004, provides the necessary guidelines for implementing a training program across the Department.
- 5.4 The emphasis on accommodating people with disabilities in the community over the past twenty years means that an increased number of people with disabilities require access to the full range of services and community based supports. A Disability Action Plan provides a mechanism to ensure equity of access to services for people with disabilities.
- 5.5 The benefits of an accessible service will be enjoyed by everyone including: older people; people with family responsibilities; people from diverse backgrounds; and people with temporary disabilities who have undergone recent trauma, surgery or illness.
- 5.6 The greatest overall improvement is likely to come from redesigning processes and systems both within and across the spectrum of service providers and DFC Central Office.
- 5.7 The *DDA* provides for the independent investigation and conciliation of complaints of discrimination by the Human Rights and Equal Opportunity Commission (HREOC). In the event of a complaint, HREOC is obliged to consider a Disability Action Plan or any other relevant factors or documents as part of a defence of unjustifiable hardship. However, an Action Plan must demonstrate a commitment to eliminate discrimination within a reasonable period of time and must be implemented. The mere existence of an Action Plan does not constitute a defence.

6.0 What is Disability Discrimination under the DDA

- 6.1 **Direct discrimination** is defined under Sections 5, 7, 8 and 9 of the DDA:
A discriminator treats or proposes to treat a person with a disability, or an associate of a person with a disability, less favourably than he or she treats, or would treat a person without a disability, in the same or similar circumstances, because of the disability;
- 6.2 Intention to discriminate is not necessary. If a person is treated less favourably for more than one reason, only one of the reasons needs to be on the ground of disability for the matter to come under the DDA (Sec 10).
- 6.4 **Indirect discrimination** is defined under Section 6 of the DDA:
A discriminator discriminates against another person on the ground of a disability if the discriminator requires the person with a disability to comply with a requirement or condition:
- (a) with which a substantially higher proportion of persons without the disability comply or are able to comply; and
 - (b) which is not reasonable having regard to the circumstances of the case; and
 - (c) with which the aggrieved person with a disability does not or is not able to comply.
- 6.5 Intention to discriminate is not necessary. Indirect discrimination is likely to occur more frequently than direct discrimination (other than in employment). The discriminator is able to raise the question of whether the condition is reasonable. The discriminator has the defence of “unjustifiable hardship” available.
- 6.6 Section 11 of the DDA states that all relevant circumstances of a particular case are to be taken into account in determining what constitutes **unjustifiable hardship** as a defence, including:
- any future benefits or detriments likely to accrue or be suffered by any persons concerned; and
 - the effect of the disability of the person concerned; and
 - the financial circumstances and the estimated amount of expenditure required to be made by the person claiming unjustifiable hardship; and
 - in the case of the provision of services, or the making available of facilities - **an action plan** given to the Human Rights and Equal Opportunity Commission under Section 64 of the DDA.
- 6.7 For something to be an unjustifiable hardship it has to be more than just an inconvenience, or a relatively minor expense - it has to be something that will really involve hardship that cannot be justified.

7.0 Principles Underpinning the Disability Action Plan

7.1 This Action Plan is underpinned by the following principles:

- Respect for human rights and the countering of ignorance, discrimination, misunderstanding and racism are fundamental principles;
- People with disabilities have the right to be recognised as valued and equal citizens;
- People with disabilities have the right to be treated with respect and dignity and to realise their potential to intellectual, physical, social, emotional, sexual and spiritual development;
- People with disabilities have the right to access the same services and opportunities, contribute in the same areas, and enjoy and participate in the same activities and challenges which are available to the rest of the community;
- People with disabilities have the right to access a range of services, support and information that provide them with the level and form of assistance and support that is appropriate to their individual circumstances including place of residence, cultural and socio-economic settings;
- People with disabilities have the right to be consulted and contribute to the economic, social, political and cultural life of the South Australian community.
- Aboriginal people and those from a non-English speaking background with disabilities have the right to have their unique needs met by the provision of services, which support access and equity and prevent discrimination on the basis of race and culture.

8.0 Key Outcomes for South Australian People with Disabilities

8.1 The Department for Families and Communities supports the development and implementation of a whole of government approach to Disability Action Plans in South Australia.

8.2 The State Government has made a commitment to improve the rights of people with disabilities in the South Australian community. To achieve the Government's vision, five key outcomes were endorsed to provide a practical framework for Government Portfolios and Departments to meet the State Government's obligations under the DDA.

8.3 As outlined in *Promoting Independence: Disability Action Plans for South Australia*, the outcomes are that:

- Portfolios and their agencies ensure **accessibility** to their services to people with disabilities;
- Portfolios and their agencies ensure **information** about their services and programs **is inclusive** of people with disabilities;

- Portfolios and their agencies deliver advice or services to people with disabilities with **awareness and understanding** of issues affecting people with disabilities;
- Portfolios and their agencies provides opportunities for **consultation** with people with disabilities in decision making processes regarding service delivery and in the implementation of **complaints and grievance mechanisms**;
- Each portfolio Chief Executive will ensure that the Government has met the **requirements of the *Disability Discrimination Act 1992* and the *Equal Opportunity Act 1984*.**

8.4 The *Promoting Independence: Disability Action Plans for SA* policy is entering its fifth year of reporting on implementation and has been a vehicle to collate all portfolios' disability action plans. In addition, this process which is monitored and driven by an across government Reference Group, sets directions and priorities for agencies such as DFC to pursue.

The strategy acknowledges that full participation and inclusion of people with disabilities requires 'whole of government' policy and service provision. This Plan strongly promotes assessment and redesign of policies, programs, services and procedures to ensure that accessibility and inclusion is being addressed.

9.0 Monitoring and Evaluation

- 9.1 Development of disability action plans are described Under Section 61(e) of the *DDA*, where it states that they must include provisions for evaluating the policies and strategies designed to eliminate discrimination.
- 9.2 DFC's Organisational Development division will have the responsibility for coordinating the ongoing monitoring and evaluation of the DFC Disability Action Plan.
- 9.3 It is the responsibility of each service provider to develop a plan consistent with the DFC Disability Action Plan and then provide an outline of actions in progress and/or completed, and timelines for ongoing actions.
- 9.4 The requirement to develop action plans and provide annual progress reports will be included in the contractual arrangements between DFC and service providers. Each service provider will establish formal procedures for an identified person to report on the progress of implementation of the Plan. For example:
- Similar arrangements will need to be formalised with DFC Central Office (Organisational Development), Children Youth and Family Services (CYFS) and non-government funded services.
 - Tender documents and contracts should include a statement that all works and services will comply with relevant legislation.
 - Training programs should demonstrate adherence to the Disability Awareness and Discrimination Training Framework.

- 9.5 Disability Action Plan strategies will be required to be incorporated into the business plans of DFC and progress on the Plan should become a regular agenda item for Executive meetings.
- 9.6 An annual evaluation will involve development of specific performance indicators to assess the success and effectiveness of the strategies and actions in achieving the Plan's outcomes. The outcomes will be assessed against the performance indicators and will provide the basis for any recommended changes to the strategies and actions. Consideration needs to be given to expanding the current accreditation processes to include improved outcomes for people with disabilities.

10.0 Disability Action Plan – Implementation Table

1. PLANNING AND POLICY DEVELOPMENT

OUTCOME

Greater accessibility to services for people with disabilities.

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
1. Establish policies and protocols in relation to equitable access for people with disabilities to mainstream services	<ul style="list-style-type: none"> DFC Divisions and service providers will review policies and programs to identify changes required to ensure accessible, non-discriminatory services. DFC Divisions and agencies will promote flexibility and responsiveness and innovative models of service delivery which are tailored to meet the particular needs of people with disabilities. DFC Divisions and agencies will review funding programs eg Home and Community Care (HACC), community services etc to ensure equity for people with disabilities. Service providers will develop and implement policies to ensure equity of access to mainstream services for people with disabilities. DFC will promote the Disability Awareness and Discrimination Training Framework and training programs for policy makers to raise awareness and understanding. 	All Divisions & Service Providers.	<p>Dec 05</p> <p>Feb 06</p> <p>Feb 06</p> <p>Dec 05</p> <p>October 05</p>	
2. Governance bodies (eg Boards, Management Committees) will be made aware of their responsibilities and involve people with disabilities in decision making processes	<ul style="list-style-type: none"> DFC will provide information to Boards of Directors to be aware of their roles and responsibilities in relation to the Disability Discrimination Act 1992 and Disability Action Plans. Boards of Directors as part of their commitment to consumer participation will identify what supports are required by people with disabilities to contribute to decision making about services. Boards of Directors will establish appropriate consultation mechanisms with people with disabilities as part of their decision making processes. 	DFC Agencies Service Providers CYFS	Ongoing	

Greater accessibility to services for people with disabilities. (Cont)

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
<p>3. Incorporate the interests of people with disabilities into corporate and operational planning</p>	<ul style="list-style-type: none"> • DFC will provide information to service providers on developing Disability Action Plans. • DFC will incorporate requirements to develop Disability Action Plans into service agreements or other equivalent arrangements. • DFC will monitor the implementation and evaluation of service provider Disability Action Plans. • Service providers will develop Action Plans with timeframes. 	<p>Org Development All Divisions</p> <p>Org Development & Service providers</p> <p>Service providers</p>	<p>Ongoing</p> <p>Oct 05</p> <p>Ongoing</p> <p>Ongoing</p>	
<p>4. Review and adapt services and programs to ensure that people with disabilities are not excluded and do not experience discrimination as users of services, as service providers or as staff</p>	<ul style="list-style-type: none"> • Service Providers will review services and programs to determine whether they are being used and accessed by people with disabilities. • Service providers will make recommendations regarding any proposed changes to improve access and develop actions for implementation. • Service providers will ensure that appropriate consultations with people with disabilities occur as part of planning for new services and programs. 	<p>Service providers</p> <p>Service providers</p> <p>Service providers</p>	<p>Feb 06</p> <p>June 06</p> <p>Ongoing</p>	

2. ACCESSIBILITY OF BUILDINGS, FACILITIES AND SERVICES

OUTCOME

People with disabilities will have improved physical access to buildings, facilities and services.

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
5. Establish policies and protocols in relation to equitable access to public buildings and facilities where DFC Services are provided.	<ul style="list-style-type: none"> DFC will review the Department for Administration and Information Services' (DAIS) 'Disability Access Guide' with the aim of adopting it as a disability access compliance policy for all public buildings and facilities. DFC will ensure all new buildings and major refurbishments to existing buildings used by DFC meet the requirements as specified within the DAIS guide. 	Organisational Development	Feb 06	
		Organisational Development & Service Providers	Ongoing	
6. All new public buildings, building upgrades and refits of DFC properties and service providers' buildings shall comply with DAIS Disability Access guide and the Building Code of Australia	<ul style="list-style-type: none"> DFC will ensure that the approval process for all new public buildings and major building refurbishments will include assessment of and compliance with disability access requirements. DFC & Service providers will ensure that all new buildings and major building refurbishments will include assessment of disability access requirements. DFC & Service Providers will ensure all building design contracts satisfy the requirements as specified within the DAIS Disability Access Guide. 	Organisational Development	Dec 05	
		Service Providers	Ongoing	
		Service Providers	Ongoing	

7. All existing public buildings used by DFC or Service Providers funded by DFC will undertake an access review/audit	<ul style="list-style-type: none"> • DFC in consultation with DAIS will develop a technical assistance package and disability awareness training to be used by service providers and building designers that includes a list of accredited access auditors. • DFC in consultation with DAIS will develop an access plan for prioritising audits and refits of existing buildings including leased buildings. • DFC in consultation with DAIS to develop a process for service providers to do audits of buildings by accredited internal/external auditors. • DFC in consultation with DAIS to develop training programs for those DFC staff responsible for managing buildings/facilities. • DFC to audit all buildings/facilities 	Org Development	Done	Funding required Funds?
		Org Development	Feb 06	
		Service Providers	Dec 05	
		OL&D	Dec 05	
		Org Development	Dec 07	
8. Residential dwellings, and/or publicly funded housing and Accommodation (class 1a & 2 buildings) - SAHT, SACHA, AHA	<ul style="list-style-type: none"> • SAHT, SACHA and AHA to determine requirements for visitability and adaptability in accordance with relevant Australian Standards. • All new social housing will be built to the requirements determined above. • Trust dwellings will be modified to meet individual occupant's needs in accordance with the existing 'Housing Modifications for People with a Disability' policy. 	Planning SA & Housing Agencies	Dec 05	
		Housing Agencies	Ongoing	
		Housing Agencies	Ongoing	
9. DFC services and programs are progressively made accessible.	<ul style="list-style-type: none"> • DFC will develop strategies and checklist tools to audit services and programs to ensure they are accessible. • DFC Services and programs are progressively made accessible. 	Org Development	Feb 06	
		All Divisions and Service Providers	Ongoing	
10. Booking of venues	<ul style="list-style-type: none"> • DFC will ensure all venues booked are accessible. • DFC will develop a list of preferred accessible venues. • DFC will ensure registrations and/or response forms include access requirements eg Hearing loop, sign interpreter, dietary requirements. 	Divisions & Service Providers	Ongoing	
		OL&D	Dec 05	
		OL&D	Dec 05	
11. Mobile Units	<ul style="list-style-type: none"> • DFC to ensure all mobile units purchased are accessible. • DFC to assess existing mobile units to determine whether they can be retrofitted to make them accessible. 	Metro Health Division	Ongoing	
			Dec 05	

3. ATTITUDINAL AND CULTURAL AWARENESS IN MANAGEMENT AND SERVICE PROVISION

OUTCOME

Demonstrated awareness and understanding by staff and volunteers of the needs of people with disabilities.

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
<p>12. Adopt a training and resource framework for the provision of education and training to equip staff and volunteers with the skills and awareness necessary to ensure there are inclusive services for people with disabilities across DFC.</p>	<ul style="list-style-type: none"> • DFC to adopt, promote and implement the Disability Awareness and Discrimination Training Framework within DFC Central Office and service providers. • In doing so DFC will: <ol style="list-style-type: none"> 1. review existing mainstream training programs to ensure there are components on DDA obligations and understanding of people with disabilities and their needs, eg induction programs, emergency evacuation procedures, etc.; 2. establish a set of guidelines and targets to underpin the implementation of training programs across the portfolio; 3. ensure the guidelines promote: <ul style="list-style-type: none"> ◇ the involvement and remuneration of people with disabilities in the delivery of training; ◇ the integration of disability awareness training needs with existing and new training programs; 4. Have targeted training for key personnel in DFC agencies, eg <ul style="list-style-type: none"> ◇ information management; ◇ asset management; ◇ line managers; ◇ receptionists. 	<p>OL&D All Divisions & Service Providers</p> <p>OL&D</p> <p>OL&D</p>	<p>Dec 05</p> <p>Dec 05</p> <p>Dec 05</p>	
	<ul style="list-style-type: none"> • DFC to design an information kit for use by managers across the portfolio. 	<p>OL&D</p>	<p>Feb 06</p>	
	<ul style="list-style-type: none"> • DFC Central Office and service providers to implement the framework within their locality according to their needs and responsibilities. 	<p>All Divisions DFC Service Providers</p>	<p>Ongoing</p>	
	<ul style="list-style-type: none"> • DFC to monitor, evaluate and report on the implementation of the training and resource framework as part of the annual reporting arrangements for the <i>Promoting Independence strategy</i>. 	<p>OL&D to coordinate All Divisions Service Providers</p>	<p>Ongoing</p>	

4. COMMUNICATION AND INTERPRETER SERVICES

OUTCOME

That all communications regarding services are made available in the full range of formats and promoted via a specific disability communication strategy.

STRATEGY	ACTION	RESPONSIBILITY	DATE	BUDGET
<p>13. Establish policies and protocols to ensure equitable access for people with disabilities to information and communication strategies on DFC programs and services.</p>	<ul style="list-style-type: none"> DFC Divisions and agencies will review the information and communication strategies to ensure that they are inclusive to people with a range of disabilities who require different formats or communications. DFC Divisions and agencies will ensure that funding and service agreements stipulate to service providers that information and communication strategies must be inclusive of needs of people with a disability. 	<p>All Divisions & Funded Services</p>	<p>Dec 05 Feb 06 & Ongoing</p>	
<p>14. All publications of DFC Divisions, and Funded Services will be available in various formats and will indicate this within the publication.</p>	<ul style="list-style-type: none"> DFC Divisions and agencies will ensure that the approval process for all publications will require appropriate consideration to being placed onto a accessible web site and produced in alternative formats such as audio-cassette, Braille; diskette; large print and plain English when requested. DFC will develop an information and communication kit that provides advice and a list of contacts for preparing alternative formats. DFC to ensure all publications will state that alternative formats are available and who to contact in order to obtain them. DFC to ensure that whenever a communication/promotional strategy occurs, a specific targeted disability strategy will be undertaken with the Disability Information and Resource Centre (DIRC); funded disability services, and the Disability Services Office. 	<p>Media and communications, All Divisions & Service Providers Media and Communications All Divisions & Service Providers All Divisions & Service Providers</p>	<p>Dec 05 & Ongoing Dec 05 Ongoing Ongoing</p>	

15. All electronic information and communication provision to be accessible to people with a range of disabilities	<ul style="list-style-type: none"> • DFC to ensure that telephone contact details for central Departments and Divisions includes either TTY numbers or the National Relay Service details to enable people who are deaf and those with communication difficulties to have access. • DFC to audit all DFC associated web sites to ensure they comply with W3C guidelines http://www.w3.org/TR/WAI-WEBCONTENT/ for electronic accessibility requirements. • DFC to ensure that all new web sites constructed meet access requirements. • DFC in consultation with DAIS will develop a technical assistance package that includes information and resources on accessible electronic information and communication provision. 	Media and Communications	Feb 05	
		DFC Web Management Unit	March 06	
		DFC Web Management Unit	Ongoing	
		Organisational Development	July 05	

5. EMPLOYMENT AND HUMAN RESOURCE PRACTICES

OUTCOME

Improved equity and equal opportunity for people with disabilities in the DFC workforce.

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
16. Promote improved awareness and equity in the employment of people with disabilities to eliminate direct and indirect discrimination	<ul style="list-style-type: none"> DFC to review its Equal Employment Opportunity policies to provide for the employment of people with a disability, taking into account the HREOC Advisory Notes on Employment & the Disability Recruitment Program 	Organisational Development	Dec 05	
	<ul style="list-style-type: none"> DFC in consultation with OCPD to provide an advisory and consultancy service on the development and review of job and person specifications. 	Organisational Development	Ongoing	
	<ul style="list-style-type: none"> DFC to develop a job and person specification information package which profiles best practice examples of well designed job and person specifications. 	Organisational Development	Feb 06	
	<ul style="list-style-type: none"> Service providers to review the requirements for positions to determine if they are inherent requirements of the job and do not discriminate against people with a disability. 	Service Providers	June 06	
17. Ensure that workplace strategies provide an equal opportunity for employees with a disability	<ul style="list-style-type: none"> DFC to provide advice to service providers on appropriate audit procedures on workplace adjustments for people with disabilities. 	Organisational Development	July 06	
	<ul style="list-style-type: none"> Procurement of equipment for staff should include modifications and universal design for staff with disabilities. 	All		
	<ul style="list-style-type: none"> DFC and service providers to review and modify as appropriate, policies and practices in relation to flexible working arrangements to meet the needs of people with a disability. 		July 06	

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
<p>18. Ensure that workforce policies and procedures provide an inclusive work environment and attracts and retains employees with a disability</p>	<ul style="list-style-type: none"> • DFC in consultation with OCEP to provide support to management in the development and review of procedures and techniques for: <ul style="list-style-type: none"> - Advertising positions - Providing job information - Arranging and conducting interviews - Setting and applying selection criteria • DFC and service providers to provide and promote training and developmental opportunities for employees with a disability and closely monitor their career plans. • Using workforce profile information, DFC and service providers to identify, review and upgrade environmental factors, which may inhibit employment opportunities. 	<p>Organisational Development</p> <p>All</p> <p>All</p>	<p>June 06</p> <p>Ongoing</p> <p>Ongoing</p>	
<p>19. Raise awareness of grievance procedures and ensure that they are accessible in a variety of formats appropriate for employees with a disability</p>	<ul style="list-style-type: none"> • DFC to review grievance procedures and processes for termination of employment or dismissal. 	<p>Organisational Development</p>	<p>Dec 05</p>	

6. COMPLAINTS MECHANISMS

OUTCOME

People with disabilities will have appropriate access to complaint handling procedures within services and to independent complaint authorities

STRATEGY	ACTION	RESPONSIBILITY	TARGET DATE	BUDGET
20. Develop and promote internal complaint handling procedures by service providers	<ul style="list-style-type: none"> • DFC Divisions and Agencies to promote the use of accessible and participatory complaints procedures for people with disabilities as part of the broader complaints handling processes. • Service providers will ensure that complaints personnel and key staff are informed of the relevant policies and will apply those policies to ensure appropriate redress for people with disabilities and their associates/advocates. • Service providers will include a report on their complaints processes and outcomes as part of their annual reporting requirements. • Complaints procedures will be incorporated into induction training for all new staff and will be widely communicated throughout their agency. • Service providers to expand the function of complaints procedures to include a role for recommending improvements in the delivery of services. 	All Divisions & Service Providers	March 06	
		Service Providers	Dec 05	
		Service Providers	July 06	
		OL&D & Service Providers	Dec 05	
		Service Providers	July 06	
21. Ensure the provision of independent complaint handling procedures	Support the development and promotion of a DFC complaints handling process through the Health and Community Services Complaints Commission. Such a process should have specific procedures for handling complaints from people with disabilities or their associates or advocates.	All Divisions	Dec 05	

Appendix 1:
Terms of Reference
DFC Disability Action Plan Implementation Committee

- To oversee the development and implementation of a Disability Discrimination Act (DDA) Action Plan for the South Australian Department for Families and Communities.
- To liaise with all other agencies and divisions of the Department for Families and Communities with the view of being aware of work being done for a DFC Action Plan.
- To provide advice on consultation requirements and other support issues within the services system to develop local Disability Action Plans.
- To liaise with the *Promoting Independence* Disability Strategy Reference Group in the development of a DDA Action Plan as part of the Whole-of-Government Disability Strategy.
- To make recommendations to Senior Executive regarding the ongoing requirements of the Disability Action Plan.
- To provide periodic reports to Senior Executive regarding the progress and implementation of the Disability Action Plan.
- To review and evaluate the process and implementation of the Disability Action Plan and make further recommendations to the Senior Executive at the completion of this project.

Membership of Disability Action Plan Implementation Committee

- Director, Organisational Development (Chair)
- Senior Policy Officer: Disability, Organisational Development (Executive Officer);
- Administration Officer, Organisational Development (Minutes and administration)

The remainder of the committee are drawn from expressions of interest with an objective of having broad representation from across the portfolio.