disability inclusion plan

2017 – 2020

Who is cohealth?

cohealth is a not-for-profit community health organisation that provides vital local health and support services. These include medical, dental, allied health, mental health, aged care and counselling, and many specialist health services, across Melbourne's CBD, northern and western suburbs.

cohealth is a large community organisation of more than 850 staff, delivering health services from over 40 sites across 14 local government areas in northern and western metropolitan Melbourne. We also conduct statewide programs that improve community and individual health and wellbeing.

Each year we deliver almost half a million medical, dental, mental health, allied health, and community support services to over 110,000 people. At the core of these services are principles of human rights, codesign and a social model of health.

cohealth's commitment to rights-based practice

cohealth is committed to providing responsive health and community services that respect the human rights of all people, celebrates their diversity, enables their access, and promotes their participation in all aspects of their health and wellbeing. Our work is underpinned by a Human Rights & Advocacy Framework (HRAF). We work to advance the human rights of all through advocacy and a focus on equity, social justice and a social model of health.

Our disability inclusion plan and the cohealth strategic plan 2015-2018

Our disability inclusion plan joins our suite of plans for marginalised groups. The disability inclusion plan has been established along the **four outcome areas** specified in s38 of the *Disability Act 2006*:

- reducing barriers to persons with a disability accessing good, services and facilities;
- reducing barriers to persons with a disability obtaining and maintaining employment;
- promoting inclusion and participation in the community of persons with a disability; and
- achieving tangible changes in attitudes and practices which discriminate against persons with a disability.

The cohealth strategic plan 2015-2018 strategic plan has five **key focus areas**:

1. Deliver better health outcomes for people
2. Keep people and communities at our core
3. Be a strong voice for system reform and health equity
4. Build an engaging innovative and healthy workforce
5. Be a progressive and enduring organisation

cohealth's inaugural disability inclusion plan recognises the people with diverse disabilities who are part of our organisation, and takes active steps to remove barriers to ensure all can take part in our programs, services and employment. cohealth recognises people with disabilities as board members, employees, clients, visitors, program participants, partners, contractors and community members.

Our strategic plan represents the direction cohealth will take towards our vision of healthy communities, healthy people. We will focus on improving the health and wellbeing of the people and the communities we work with, involving them in service design, development and delivery. We will be a strong voice for the rights of people to access health care. Our workforce will be diverse, welcoming and innovative, our organisation progressive and enduring.

The legislative background to disability inclusion plans
Under the federal *Disability Discrimination Act 1992*, and the Victorian *Equal Opportunity Act* 1977, discrimination on the grounds of disability is unlawful.

Disability rights in Australia received a significant boost in 2008 when Australia ratified the United Nations Convention on the Rights of Persons with a Disability. This Convention affirms that people with all kinds of disabilities must enjoy all human rights and fundamental freedoms. It means Australia is legally bound to protect the rights of people with a disability.

The Victorian *Charter of Human Rights and Responsibilities Act 2006* requires public authorities in Victoria to give proper consideration to a range of civil and political rights when they make decisions and when providing services.

cohealth's disability inclusion plan
The *Disability Act 2006* requires public-sector bodies to prepare disability action plans with the four outcome areas referred to above. The requirement for disability action plans reflected the Victorian Government's broader social justice policy to reduce barriers faced by disadvantaged groups.

While cohealth is not a public sector body, it has modelled its disability action plan along these requirements.

Following a series of consultations with people with disabilities and with cohealth staff, cohealth's disability inclusion plan is a three-year systemic approach to investigating and removing barriers that prevent people with disabilities from using cohealth services or being part of its community.

It has been prepared with the objective of creating a disability presence throughout the organisation. In this way, consideration of disability access, and the inclusion of people

with disabilities, becomes a normal part of planning, policy development and service delivery throughout cohealth.

The disability inclusion plan lists specific actions to be undertaken in each outcome area, and specifies by whom and by when. Each action has a performance indicator by which cohealth will seek evidence that its actions have removed barriers. Critical to the efficacy of the plan is feedback from people with disabilities, which cohealth will obtain through its community consultation processes.

Monitoring the disability inclusion plan will be the Internal Disability Inclusion Working Group, made up of senior staff from the directorates associated with each outcome area. The Working Group will meet quarterly to monitor progress, and will conduct an annual review of the plan.

A Resource Index (RI) is provided at the end of this document. The RI aims to provide responsibility holders within the plan with additional resources and support in relation to their respective areas of responsibility.

Outcome Area 1   **Reduce barriers to people with disabilities accessing goods, services, and facilities**

Strategic Plan focus area   **Deliver better health outcomes for people**

Principle Directorate/s   **Corporate Services, Public Affairs**

cohealth undertakes to put in place a program to remove physical barriers which prevent people with disabilities from entering cohealth buildings and using building facilities. An access retrofitting program will survey cohealth sites according to a priority list, and will allow an annual program, based on universal design principles, to remedy physical access barriers.

Ref	Action	When	Who	Performance measure
	Access retrofitting program			
1.1	Use disability inclusion plan access checklist results to prepare a weighting table in order to rank sites in terms of priorities for access retrofitting works through to 2020[1]	Jun 2018	Corporate Services	• Weighting table is created • Endorsement from Disability Inclusion Working Group
1.2	Select and engage accredited access auditor to review top selected sites according to the weighting table[2]	Jun 2018		• Selected access auditor endorsed by Disability Inclusion Working Group
1.3	Survey all accessible car park slots at cohealth sites against Building Code of Australia /Premises Standards.[3],[4] Determine a priority list for refurbishment over three years, and incorporate into the access retrofitting program	Jun 2018		• Feedback from clients with disabilities is positive • Yr 2 – 25% of parking slots listed for refurbishment are completed • Yr 3 – 25% of parking slots listed for refurbishment are completed

[1] Checklist used in the development of cohealth DAP
[2] Cost of accredited access audits to be covered by Diversity Projects & Strategies
[3] https://www.humanrights.gov.au/our-work/disability-rights/disability-standards
[4] Excludes accessible parking managed by Local Government

1.4	Survey all designated accessible toilets at cohealth sites against Building Code of Australia /Premises Standards. Determine a priority list for refurbishment over three years, and incorporate into the access retrofitting program		Jun 2018		• Feedback from clients with disabilities is positive • Yr 2 – 25% of toilets listed for refurbishment are completed • Yr 3 – 25% of toilets listed for refurbishment are completed
1.5	Survey all public meeting rooms at cohealth sites against Disability Discrimination Act and Equal Opportunity Act. Investigate the purchase of portable augmented hearing loops or determine a priority list for fitting out rooms with augmented hearing systems and incorporate into access retrofitting program		Jun 2018		• Feedback from hearing impaired clients is positive • Yr 2 – one public meeting room is fitted with an augmentation system/one portable hearing loop is purchased • Yr 3 - one public meeting room is fitted with an augmentation system/one portable hearing loop is purchased
1.6	Carry out Year 1 access retrofitting program at four cohealth sites (as already determined by Corporate Services)	Innerspace 4 Johnston St - doors	Jun 2018	Corporate Services	• Feedback from cohealth clients with disabilities • Observations from cohealth staff • Survey of users
		Innerspace 4 Johnston St - reception			
		Healthworks 215 Nicholson - entrance			
		Healthworks 215 Nicholson - reception			
		Collingwood 365 Hoddle - waiting area			
		Collingwood 365 Hoddle - counter			
1.7	Install compliant visibility strips on glass		Jun 2018		• Three cohealth sites have strips on main

	doors at selected cohealth sites			• glass doors • Vision-impaired clients give positive feedback
1.8	Install hi-visibility nosings on steps at selected cohealth sites	Jun 2018		• Three cohealth sites have nosings installed on all steps • Vision impaired clients give positive feedback
1.9	Ensure all door handles at selected cohealth sites are of the D-lever type	Jun 2018		• Feedback from cohealth clients with disabilities • Observations from cohealth staff
1.10	Investigate funding sources for retrofitting works	Continuing		
1.11	Assess Year 1 access retrofitting program, prepare program for Year 2 (2018-2019)	Jun 2018		• Feedback from clients and progress of works to guide Year 2 access retrofitting program
1.12	Conduct Year 2 access retrofitting program	Jun 2019		• Feedback from clients
1.13	Assess Year 2 retrofitting program, prepare program for Year 3 (2019 – 2020)	Jun 2019		• Feedback from clients and progress of works to guide Year 3 access retrofitting program
1.14	Conduct Year 3 access retrofitting program	Jun 2020		
	Website compliance			
1.15	Review website for compliance with Web Accessibility Initiative (WAI) guidelines	Nov 2018	Public Affairs	• Website complies with basic requirements of WAI guidelines

Outcome Area 2   **Reduce barriers to people with disabilities obtaining and maintaining employment**

Strategic Plan focus   **Build an engaging innovative and healthy workforce**

Principle Directorate/s   **People & Culture**

cohealth will ensure that its recruitment processes give the same opportunity for candidates with disabilities to compete for cohealth positions as any other candidate. cohealth will ensure that its employees with disabilities have the same opportunities for promotion, training and professional development as all other employees. A reasonable adjustment policy will ensure cohealth employees with disabilities have the same opportunities, as any other employee, to work to the best of their skills and abilities.

Ref	Action	When	Who	Performance measure
2.1	cohealth develops links and establishes relationships with state and national disability employment specialists	Jun 2018	People & Culture	• Two meetings attended with a disability employment specialist • cohealth joins national disability employment body
2.2	Conduct annual Equal Opportunity Act compatibility review of recruitment processes to ensure that candidates and applicants with disabilities compete for cohealth positions on an equal footing with other candidates	Jun 2018 Jun 2019 Jun 2020		• No. enquiries from applicants with disabilities, incl requests for information in alternative formats • No. applications from candidates with disabilities
2.3	Research and write a reasonable adjustment policy	Jun 2018		• Policy complies with Victorian Equal Opportunity Act 2010 • Survey of cohealth employees with disability
2.4	Ensure that cross-organisational professional development courses and sessions use materials that are accessible and take place in accessible venues	Continuing		• Feedback from participants speaks to training accessibility
2.5	Offer one student placement each year to a	Jun 2018		• Students report a positive experience

	tertiary student with a disability	Jun 2019 Jun 2020		• cohealth develops good working relationships with TAFEs and universities near its major sites
2.6	In the induction process, include information in on the disability action plan	Continuing		• All new employees become familiar with the disability action plan
2.7	Conduct annual review to ensure that policy and protocols around the emergency evacuation of employees visitors and clients with disabilities remains up-to-date	Jun 2018 Jun 2019 Jun 2020		• Emergency evacuation drills demonstrate that protocols ensure evacuees with disability exit safely

Outcome Area 3   **Promote inclusion and participation in the community of people with disabilities**

Strategic Plan focus   **Keep people and communities at our core; Be a strong voice for system reform and health equity**

Directorate/s   **Public Affairs, Business Innovation**

cohealth will use its position of influence in the communities it serves to lead by example in promoting practices which include and welcome people with disabilities

Ref	Action	When	Who	Performance measure
	Public events access protocols			
3.1	Research and devise a baseline public events access protocol	Jun 2018	Public Affairs	• Feedback from people with disabilities is positive
3.2	Apply public events protocol to one selected event	Dec 2018		• One public event is organised, with access protocols • Feedback from event participants is positive
	Accessible publications and materials			
3.3	Research and prepare a publications accessibility checklist to guide development of cohealth publications	Jun 2018	Public Affairs	• Publication use accessibility guideline • Feedback from a community members on cohealth participation indicates improved accessibility
3.4	Review cohealth branding for access in terms of colour, layout, readability and access for people with: - vision impairment and print disability; and - intellectual disabilities	Jun 2019		• Test panel of vision-impaired people and people with intellectual disabilities give positive feedback
3.5	Ensure all cohealth videos have a captions track	Jun 2018		• Positive feedback from hearing-impaired users
3.6	Investigate the provision of Auslan translations on organisational videos	Jun 2018		• Information gathered on the use of Auslan video translations, and when these

Ref	Action	When	Who	Performance measure
				translations are required
3.7	Review publicity material to ensure images reflect range of people and clients who attend cohealth	Dec 2017		• Review conducted and assessed as being representative
Ref	**Action**	**When**	**Who**	**Performance measure**
	Universal signage policy			
3.8	Assess all cohealth signage against compliant signage requirements.	Jun 2018	Public Affairs	• Information is gathered and used in devising timetables of action per 3.13
3.9	Devise timetable to change cohealth where necessary; select two sites as a priority	Dec 2018		• Two cohealth sites have compliant signage • Focus group tests are positive
	Access to cohealth sites			
3.10	Investigate, trial and review a concierge model at one selected cohealth site	Jun 2018	Business Innovation	• Feedback from focus group is positive
	Consultancy with people with disabilities			
3.11	Use Participation Register to determine how people with disabilities can provide feedback on or be a part activities within the disability action plan	Jun 2018	Business Innovation	• People with disability who are on cohealth's Participation Register are engaged in the implementation of Disability Inclusion Plan activities
3.12	Initiate contacts with disability advocacy groups to invite participation from a people with various impairment categories	Continuing		• cohealth is able to diversify participation from people with disabilities in two new categories
	Procurement policy			
3.13	Investigate and prepare a cohealth procurement policy with a view to favouring contractors with disability access policies in place	Continuing	Corporate Services and Business Innovation	• Information is gathered in relation to diversity in procurement policies and practices, with this information used to inform the development of a cohealth policy

Outcome Area 4   **Achieve tangible changes in attitudes and practices which discriminate against people with disabilities**

Strategic Plan focus   **Be a progressive and enduring organisation**

Principle Directorate/s   **People & Culture, Public Affairs**

cohealth will strive to promote positive attitudes towards people with disabilities by ensuring that its staff and its community members gain information about disability that is balanced, correct and informative.

Ref	Action	When	Who	Performance measure
4.1	Investigate and develop a cross-organisational training policy that supports general human rights and diversity content (including disability inclusion)	Dec 2018	People & Culture	• cohealth ensures a disability training plan is aligned with its overall organisational development goals and training policy
4.2	Prepare news items on aspects of disability for staff intranet	Continuing	Public Affairs	• Over twelve months, two news items on disability appear on the cohealth intranet
4.3	Invite guest speaker on disability at a staff gathering	Continuing	Business Innovation	• One guest speaker presents at a gathering each year • Feedback from staff is positive
4.4	Gather printed and visual resources on disability and make available for staff	Continuing	Business Innovation	• Material is gathered, staff regularly request material
4.5	Gather electronic information on disability and make available to all staff	Continuing	Business Innovation	• Information as it relates to disability inclusion is housed on cohealth's intranet

Resources Index (RI)

Outcome Area 1   Access

Reduce barriers to people with disabilities access to goods, services, and facilities

1.2	Select and engage accredited access auditor to review top selected sites according to the weighting table

Accredited access auditors belong to a professional association, called the Association of Consultants in Access Australia; their website is at

https://www.access.asn.au

The work of access consultants is negotiable. They can be invited to give quotes on specified work at particular sites. Using an accredited access auditor offers assurance that completed retrofitting works will be compliant.

1.3/4/5	Survey all accessible car park slots, designated accessible toilets and public meeting rooms at cohealth sites. Determine a priority list for refurbishment over three years, and incorporate into the access retrofitting program

The availability of compliant parking slots and accessible toilets was a theme that emerged repeatedly during the consultations.

1.6	Carry out Year 1 access retrofitting program at four cohealth sites

Universal design is a principle that a device or a fitting can be used by everyone, to the greatest extent possible, and regardless of age or disability. Universal design means that specialised or adapted design no longer becomes necessary. There are several websites which discuss the principle and give examples:

http://universaldesignaustralia.net.au

https://www.disabilityaccessconsultants.com.au/universal_access_design/
An excellent source of advice about disability access is at the Australian Human Rights Commission

http://www.humanrights.gov.au/our-work/disability-rights/guides

1.7/8/9	At selected cohealth sites, install visibility strips on glass doors, hi-vis strips on step nosings, and ensure all door handles are of the D-lever type

These measures are inexpensive, easy to install, and will make an immediate difference to clients and visitors with disabilities, especially for those with vision impairment.

1.15 Review website for compliance standards

There are numerous contractors who are able to examine the website and give advice on access measures to ensure the website can be used by people with disabilities, especially those with vision impairments. For a general and detailed discussion on website compliance, the international site is recommended:

https://www.w3.org/WAI/

Outcome Area 2 **Employment**

Reduce barriers to people with disabilities obtaining and maintaining employment

2.1 cohealth develops links and establishes relationships with state and national disability employment specialists

An excellent national body to support employers with issues around disability employment is the Australian Network on Disability (AND), https://www.and.org.au

There is a subscription fee payable; this will give cohealth access to a considerable range of advice, information and services around the employment and inclusion of people with disabilities within the organisation.

AND's headquarters is in Sydney, however it has opened a Melbourne office.

There are various local disability employment specialists operating in areas which overlap cohealth sites.

2.2/3 Conduct annual Equal Opportunity Act compatibility review of recruitment processes to ensure that candidates and applicants with disabilities compete for cohealth positions on an equal footing with other candidates, and draft a reasonable adjustment policy

The Victorian Equal Opportunity and Human Rights Commission and Australian Human Rights Commision websites provide a range of useful resources in relation to human rights compliant employment and reasonable adjustments.

http://www.humanrightscommission.vic.gov.au/the-workplace/employer-responsibilities/recruitment

http://www.humanrightscommission.vic.gov.au/the-workplace/employer-responsibilities/reasonable-adjustments-in-employment

2.5	Offer one student placement each year to a tertiary student with a disability

Most tertiary institutes have a specialist officer who works with students with disabilities, for example a disability liaison officer. They are usually located within the student services office or department. Most likely they will work with the relevant school which would arrange the internship.

Outcome Area 3　　　　　　**Inclusion and participation**

Promote inclusion and participation in the community of people with disabilities

Note: This index gives links to several private suppliers of various access services. A link in this index is not necessarily an endorsement of the supplier. We recommend cohealth seek quotes from different suppliers if it wishes to purchase a service.

3.1	Research and devise a public events access protocol

Local governments organise numerous public events such as festivals, and through their Metro Access officers have developed expertise in accessible public events. Recent initiatives have included roving Auslan interpreters, and a "time-out tent" for those coping with sensory overload. Contact the Metro Access officer of the local government where the event is being planned. (Note: at the time of preparation of this Plan, the Metro Access program will be phased out at June 2018.)

3.3/4	Develop an accessible publications checklist and review cohealth publications for access in terms of colour, layout, readability and access for people with vision impairment, print disability and intellectual disabilities

Vision Australia has a specialist service for organisations wishing to improve access in their printed communications

https://www.visionaustralia.org/business-and-professionals/print-accessibility-services

Scope offers a specialist translation service to convert publications into Easy English for the use of some people with intellectual disabilities, and for adults with difficulties with written English.

http://www.scopeaust.org.au/service/accessible-information/

TaggedPDF provide a range of useful resources for graphic designers and copywriters in relation to accessibility of print materials.

http://taggedpdf.com.au/resources/

3.5	Ensure all cohealth videos have a captions track

We recommend that the assessment of all visual material includes making sure there is a captions track, usually in the form of closed captions. Videos uploaded to YouTube can take advantage of their built-in English caption tracks.

For advice on captioning services, Media Access has a list of suppliers:

https://mediaaccess.org.au/about/captioning-audio-description-and-transcription-suppliers

3.6	Investigate the provision of Auslan translations on organisational videos.

An emerging access trend is to provide an Auslan translation of a visual presentation for people whose first language is Auslan and who may have problems with standard English captions. This involves the preparation of an Auslan script and

the filming of an Auslan interpreter, which then appears either as a box within the original film clip, or it is presented as an alternative clip for Auslan users. VicDeaf, through its Sign Language Video Production arm, is able to provide advice on Auslan translations, at:

http://www.vicdeaf.com.au/slvp

3.8/9	Survey all of cohealth's signage and assess against compliant signage requirements.

This is usually called "wayfinding". One consistent design that takes into account colours, fonts, size and luminance contrast is the ideal access requirement to allow universal navigation through a building. It is discussed here as a principle of universal design:

http://universaldesignaustralia.net.au/2016/08/wayfinding-design-guidelines/

3.19	Initiate contacts with disability advocacy groups to invite participation from a people with various impairment categories

The Disability Advocacy Resource Unit (DARU) has a very good listing of principle advocacy groups for a range of disability and impairment categories.

http://www.daru.org.au/organisations

Definitions[5]

A / AA / AAA web accessibility standards

These are international standards that determine the level of accessibility of a website. These are governed by the World Wide Web Consortium (W3C) and are outlined in their Web Content Accessibility Guidelines www.w3.org

Access

Access refers t the ability of a person with a disability to use goods, services, facilities and information. For example, a ramp allows access into a building and a captioned video allows access to information. Access to the community refers to the ability of a person with a disability to take part in the community, for example, to becoming a volunteer or to transacting personal business.

Access audits

An access audit rates a building for useability and accessibility by people with a disability. Access audits find barriers to access, and offer solutions.

Accessible formats

Accessible formats include Word, Rich Text Format, HTML, Braille, large print, audio, Easy English, and Auslan translations.

Barriers

Things that exclude people with disabilities. Barriers can be physical, such as an inaccessible building or an information sheet that is only available in standard print, or attitudinal, such as wrong assumptions about what a person with a disability can do.

Built environment

The physical, public environment, including commercial and public buildings, toilets, parks shopping strips and footpaths.

Disability awareness / access training

Training that provides facts and information which promotes understanding of disability issues.

Disability discrimination

To treat someone with a disability less favourably than someone without a disability, on the basis of their disability. Discrimination on the grounds of disability is prohibited under the Federal *Disability Discrimination Act 1992*, and in Victoria, under the *Equal Opportunity Act 1995*.

---

[5] From aDAPting to Disability – a guide to Disability Action Plans in Victoria Second edition, June 2009. Office for Disability, Department of Health and Human Services

Discrimination can be direct or indirect. An example of direct discrimination is refusing to allow a person with a disability to enrol in a training course, even though they are eligible, because they have a disability. An example of indirect discrimination is requiring all applicants for a job to fill out a form that cannot easily be completed by a person with a disability.

Reasonable adjustment

Employees with a disability may require reasonable adjustments to ensure they can carry out their required duties, and to ensure safety in the workplace. Examples are changes to work processes, to equipment, or adjustments to work schedules. The law states that whenever it is necessary, possible and reasonable, employers should take into account a person's disability and make appropriate adjustments to the work environment to accommodate that person.

Stereotypes

Entrenched assumptions about disability and people with a disability that are not based on evidence. Stereotypical thinking about disability, for example, that all blind people are helpless, can inhibit changes to promote the participation of people with disability in society.

Universal design

Universal design is a solution that produces buildings, products and environments that are useable and effective for everyone, not just for people with a disability.