

INDEPENDENT COMMISSIONER AGAINST CORRUPTION
OFFICE FOR PUBLIC INTEGRITY

DISABILITY ACCESS AND INCLUSION PLAN 2020-24

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This Disability Access and Inclusion Plan is available on the Independent Commissioner Against Corruption website. If you require a copy in an alternative format, (such as easy read, large font, electronic format, audio or braille), please contact admin@opi.sa.gov.au or call 08 8207 1777 or 1300 782 489 (country callers).

www.icac.sa.gov.au

STATEMENT FROM THE COMMISSIONER

As Independent Commissioner Against Corruption I am committed to access and inclusion for every person who works in or interacts with my organisation.

This Disability Access and Inclusion Plan, which has been developed within my office, details my commitment to deliver tangible access and inclusion outcomes over the next four years. I will report on those outcomes annually in my Annual Report.

This Plan includes strategies to support equitable access to premises, events and facilities; information and communication; and employment. The object is to address the specific needs of people with disability in the delivery of our statutory functions.

The Plan comprehends access and inclusion for people with disability, particularly for women, Aboriginal and/or Torres Strait Islander people, children, and people who are culturally and linguistically diverse.

I invite you to contact my office with any feedback to assist us in the continuous improvement and delivery of our Disability Access and Inclusion Plan.

The Honourable Ann Vanstone QC
INDEPENDENT COMMISSIONER AGAINST CORRUPTION

14 September 2020

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ABOUT US

INDEPENDENT COMMISSIONER AGAINST CORRUPTION

The *Independent Commissioner Against Corruption Act 2012 (SA)* established the Independent Commissioner Against Corruption (the Commissioner) and the Office for Public Integrity.

The functions of the Commissioner are to:

- identify and investigate corruption in public administration; and
- prevent or minimise corruption, misconduct and maladministration in public administration, including through referral of potential issues to inquiry agencies and public authorities, education, and the evaluation of practices, policies and procedures.

The Office for Public Integrity is responsible to the Commissioner for receiving and assessing complaints and reports and determining the action to be taken, or making recommendations to the Commissioner as to the action to be taken in respect of those complaints and reports. The Office for Public Integrity has legislative functions under the *Police Complaints and Discipline Act 2016 (SA)* for the receipt and review of complaints and reports about police and oversight of police disciplinary processes. The Commissioner and the Office for Public Integrity have legislative functions under the *Public Interest Disclosure Act 2018 (SA)*.

The use of the word agency in this Plan refers to the office of the Independent Commissioner Against Corruption and includes the Office for Public Integrity.

JUDICIAL CONDUCT COMMISSIONER

The Judicial Conduct Commissioner has been established by the *Judicial Conduct Commissioner Act 2015 (SA)* with the primary function of receiving and dealing with complaints in relation to the conduct of judicial officers.

The Judicial Conduct Commissioner endorses and adopts this Disability Access and Inclusion Plan and all of the principles and commitments expressed within the Plan.

WORKFORCE PROFILE

At 30 June 2020, the agency's workforce comprised 70.3 full-time equivalent employees¹ made up of 75 individuals, 15 of whom work on a part-time or casual basis. Members of the workforce range in age from 21 years to 65 plus years.

At the time this plan was prepared, the workforce was relatively evenly distributed between those who identified as male and female. At the executive² level five employees identified as female and seven identify as male.

¹ While the Commissioner and the Deputy Independent Commissioner Against Corruption have been included in the above tally, they are not employees.

² Executive classification is based on a total remuneration package value in excess of \$154,000 per annum, including superannuation.

A survey of all employees was carried out in August 2020. Of the 55 employees who responded to the survey, 18.1 percent identified as a person who is culturally and linguistically diverse. From the same group of respondents: 10.9 percent identify as LGBTIQ+ (lesbian, gay, bisexual, transgender, intersex and queer)³; 9.1 percent identify as a person living with disability; and 1.8 percent identify as Aboriginal and/or Torres Strait Islander.

STRATEGIC CONTEXT

This Plan has been formed in response to the establishment of the *Disability Inclusion Act 2018 (SA)*, which prescribes a number of requirements to consider diversity and the specific needs of people with disability who face additional barriers due to their age, gender or culture.

The Plan is designed to proactively improve access and participation for people with disability and includes strategies to support people in the following areas:

- Access to our premises, events and facilities
- Access to information and communications
- Employment
- Addressing the specific needs of people with disability in the delivery of our statutory functions.

The project aligns with the South Australian Public Sector Diversity and Inclusion Plan which is designed to support the delivery of the South Australian Public Sector Diversity and Inclusion Strategy 2019-21.

The Plan aligns with the following strategic priorities as outlined in the agency's Strategic Plan 2017–20:

- Employer of choice
- Ethical and accountable workforce
- Engagement and influence.

OUR VISION AND VALUES

Our vision

Good governance, accountability, integrity and ethical decision making throughout public administration for the benefit of all South Australians.

Good governance includes recognising and committing to the importance of diversity and inclusion in the way we build and maintain our workforce and deliver our statutory functions to members of the South Australian community.

³ LGBTIQ+ (lesbian, gay, bisexual, transgender, intersex and queer) is used in an effort to be as inclusive as possible, although it is recognised people may identify with other terms.

The agency's internal governance includes a policy framework aligned to the fundamental principle of equal opportunity for all, including people with disability.

Our values

Independence

We conduct ourselves and make decisions according to law and without fear or favour.

Accountability

We are responsible for our actions and decisions.

We use our resources responsibly.

We scrutinise ourselves as vigorously as we scrutinise others.

Integrity

We are fair and unbiased in all our dealings.

We are honest, trustworthy, reliable and fearless in fulfilling our duties.

Respect

We treat everyone with respect, fairness and courtesy.

We take our powers and responsibilities seriously.

Excellence

We lead by example and demonstrate best practice.

We continuously strive to improve our capabilities, skills and knowledge.

We are committed to professionalism and service.

Collaboration

We practise and encourage the sharing of knowledge and ideas.

We actively seek the contribution and perspectives of others.

We work together to achieve best outcomes.

The agency's corporate value of accountability means we scrutinise ourselves as vigorously as we scrutinise others. We hold ourselves to account to ensure fairness and equity in the way people with disability access our employment opportunities, our premises whether as a workplace or to access our services, and our information. The agency's management team recognises the importance of diversity and inclusion, and as such has established a standing agenda item for discussion at its weekly meeting.

The agency is committed to an ongoing learning and development program to improve our employees' awareness and understanding of bias and how bias impacts upon the decision-making process.

Our vision as a law enforcement agency is underpinned by our corporate value of respect. We are committed to treating everyone with respect, fairness and courtesy. The agency builds and maintains public confidence by exhibiting the highest standards of behaviour and integrity and speaking out about inappropriate behaviour.

ACTIONS

This plan details commitments to actions based on the themes and priority areas of the State Disability Inclusion Plan 2019-23.⁴

INCLUSIVE COMMUNITIES FOR ALL

Priority	Outcome	Actions	Timeframe
1	Involvement in the community	<ul style="list-style-type: none"> Implement a process to provide an option for a person with disability to indicate accessibility requirements when enrolling for an event. 	Dec 2020
		<ul style="list-style-type: none"> Implement an inclusive events checklist. 	Dec 2020
		<ul style="list-style-type: none"> Implement a guide to conducting accessible interviews. 	Dec 2020
2	Improving community understanding and awareness	<ul style="list-style-type: none"> Implement a program as part of the agency's values and behaviours to: <ul style="list-style-type: none"> empower individual employees in how to 'see something, say something' commit to continuing an annual employee diversity and inclusion survey develop and display posters to raise awareness about diversity and inclusion implement a standing diversity and inclusion agenda item at team meetings. 	Mar 2022
3	Promoting the rights of people living with disability	<ul style="list-style-type: none"> Implement a toolkit to provide support for line managers with employees with disability or workplace injury. 	Dec 2020
		<ul style="list-style-type: none"> Implement a toolkit to provide support for an employee with disability or workplace injury. 	Dec 2020
		<ul style="list-style-type: none"> Implement a guide for managing information provided by a child or young person contacting the agency. 	Dec 2020

⁴ The State Disability Inclusion Plan is available on the Department of Human Services website www.dhs.sa.gov.au.

LEADERSHIP AND COLLABORATION

Priority	Outcome	Actions	Timeframe
4	Participation in decision-making	<ul style="list-style-type: none"> Establish and maintain a Diversity and Inclusion Committee to build on and progress the agency's commitments to diversity and inclusion. 	Jun 2021
5	Leadership and raising profile	<ul style="list-style-type: none"> Mandate training for line managers to understand and manage unconscious bias, including bias about people with disability or workplace injury. 	Jun 2021
		<ul style="list-style-type: none"> Develop and facilitate quarterly on-boarding presentations for new employees and/or contractors to reinforce the agency's commitments to diversity and inclusion. 	Mar 2021
6	Engagement and consultation	<ul style="list-style-type: none"> Collaborate with the Office for the Commissioner for Public Sector Employment to align the agency's disability initiatives with the State Government's disability inclusion plan. 	Jun 2021

ACCESSIBLE COMMUNITIES

Priority	Outcome	Actions	Timeframe
7	Universal Design across South Australia	<ul style="list-style-type: none"> Continue to engage the services of an architect and engineer who have experience and understanding of disability requirements for all fit-out construction projects. 	Jun 2021
		<ul style="list-style-type: none"> Review the bathroom facilities audit report and develop a plan to ensure access to appropriate facilities for a person with disability. 	Jun 2021
		<ul style="list-style-type: none"> Review the door compliance audit report and develop a plan to remediate non-complying door access. 	Jun 2021
		<ul style="list-style-type: none"> Action where appropriate the audit report which recommends changes to the agency's Hearing Room to ensure proactive disability access. 	Jun 2021
		<ul style="list-style-type: none"> When system furniture is updated, provide accessible system furniture such as sit-stand desks or open bench space on each floor of the agency's premises for use by employees as an alternative to their usual work station. 	Jun 2022

Priority	Outcome	Actions	Timeframe
8	Accessible and available information	<ul style="list-style-type: none"> Continuously review and improve essential website elements to meet World Wide Web Consortium's accessibility standards, including tagging PDFs, captioning video or providing a transcript, and publishing public statements and media releases in accessible webpage format. 	Ongoing
		<ul style="list-style-type: none"> Continuously review and develop a collection of key information resources in a variety of accessible formats and alternative versions to assist a person with disability lodge a complaint or report. 	Ongoing
		<ul style="list-style-type: none"> Update or change the agency's online complaint forms to meet accessibility standards for internal and external customers. 	Jun 2022
9	Access to services	<ul style="list-style-type: none"> Assess the merits of implementing an automated chat bot pilot for basic enquiries made to the agency via the website. 	Jun 2021
		<ul style="list-style-type: none"> Implement an information and resources toolkit to assist an employee in offering services for a person with disability who is interacting with the agency. 	Dec 2020
		<ul style="list-style-type: none"> Implement a banner in the agency's case and investigation management system in order to provide support to a person with disability who is interacting with the agency. 	Dec 2020
		<ul style="list-style-type: none"> Continue to maintain and resource accessible options for a person with disability to lodge a complaint or report by phone, in person, via email, online form and post. 	Ongoing

LEARNING AND EMPLOYMENT

Priority	Outcome	Actions	Timeframe
10	Better supports within educational and training settings	<ul style="list-style-type: none"> Ensure the agency's Learning and Development Committee includes at least two sessions per year focused on improving understanding and awareness of inclusiveness. 	Ongoing
		<ul style="list-style-type: none"> Provide additional organisational support for the role of Contact Officer including training about inappropriate behaviour towards a person with a disability or workplace injury. 	Ongoing

Priority	Outcome	Actions	Timeframe
11	Skill development through volunteering and support in navigating the pathway between learning and earning	Not presently applicable	
12	Improved access to employment opportunities and better support within workplaces	<ul style="list-style-type: none"> Review and actively promote the application of the agency's Flexible Work Policy and Working from Home Policy to ensure those policies are being promoted and flexible working arrangements are being supported throughout the agency. 	Dec 2020
		<ul style="list-style-type: none"> Assess the viability of incorporating within the agency's premises a wellness room for breast feeding / pumping, prayer, rest, quiet reflection etc. 	Dec 2020
		<ul style="list-style-type: none"> Amend the agency's pre-employment declaration to include a question about reasonable adjustment to undertake the recruitment process. 	Dec 2020
		<ul style="list-style-type: none"> Implement a guide for implementing reasonable adjustments within the recruitment process. 	Dec 2020
		<ul style="list-style-type: none"> Implement a guide for implementing reasonable adjustments within the workplace. 	Dec 2020

DISABILITY ACCESS AND INCLUSION PLAN DEVELOPMENT

The agency has developed this Plan to align with the State's Disability Inclusion Plan 2019-23 in order to address the specific needs for all people to readily access our premises, events and facilities; information and communications; employment opportunities; and services.

The Plan recognises and seeks to address equitable access for people with disability, particularly those who face additional barriers including women, Aboriginal and/or Torres Strait Islander people, children, and people who are culturally and linguistically diverse.

CONSULTATION

The process of developing this draft Plan has involved consultation with internal and external stakeholders over a period of eighteen months.

A Disability Discrimination Working Group was formed in January 2019 to assess the agency's maturity and compliance with the *Disability Discrimination Act 1992* (Cth) and the *Equal Opportunity Act 1984* (SA). Members of the working group acted as representatives for the agency's business sections and actively sought information from employees to inform the assessment.

In June 2019 the agency's management team endorsed a Disability Access and Inclusion Framework, which formalised principles and commitments and detailed 25 tangible actions.

As part of delivering the strategic priority to 'continue to focus on a strong agency culture that promotes behaviours that align to the agency's values' – the agency's Corporate Plan 2019-20 contained a commitment to progressing the first year of the Disability Access and Inclusion Framework activities.

In order to gain a detailed understanding of the diverse profile of the agency's workforce a diversity and inclusion survey was conducted in August 2020. As well as contributing demographic profile information, employees were encouraged to provide feedback and make suggestions about the extent to which diversity is valued and respected within the agency.

Internal stakeholders continue to be engaged through day-to-day interactions across the organisation where employees are encouraged to identify opportunities for continuous improvement of accessibility for people with disability.

External stakeholders continue to be engaged through day-to-day interactions with the agency where valuable information is collected as an opportunity for continuous improvement of accessibility for people with disability.

Now that this draft plan is published on the agency's website we are seeking submissions from the public until 8 October 2020.

All outgoing correspondence from the agency until 8 October 2020 will include an invitation to read this draft Plan and provide feedback via email or by telephone.

Findings from the consultation process will be incorporated in an updated version of the Plan to be published on the agency's website by 31 October 2020. Implementation of the Plan and progress against the actions outlined in the Plan will be reported in the agency's future Annual Reports.

RELATIONSHIPS TO OTHER POLICIES, STRATEGIES AND FRAMEWORKS

This Plan aligns with the following policies:

- Recruitment policy
Disability access and inclusion is promoted in our recruitment process.
- Flexible work and working from home policies
Our workplace accommodates the employment of a person with disability.
- Workplace conduct policy
Inappropriate behaviour towards a person with disability or a workplace injury is not tolerated.
- Work health and safety and injury management policies
Our workplace provides a safe working environment for all employees.

The agency's Strategic Plan 2017-20 includes the following strategic priorities: excellence in operations; engagement and influence; capacity building; ethical and accountable workforce; and employer of choice.

In particular the priorities of capacity building, ethical and accountable workforce and employer of choice are closely related to the objectives of this Plan as they focus on enhancing flexibility of internal resources, building and maintaining a strong agency culture, holding ourselves accountable and investing in our people.

EXAMPLES OF PREVIOUS ACHIEVEMENTS

In the agency's 2018-19 Corporate plan a key activity was to assess the organisation's compliance with the *Disability Discrimination Act 1992* (Cth) and commit to a remediation plan. To achieve this objective the agency formed a Disability Discrimination Working Group in 2019.

As a result of this activity the agency has committed to a Disability Access and Inclusion Framework which outlines principles and commitments together with seven outcomes and 24 specific actions. The outcomes describe the desired state of disability access and inclusion. Each action has been allocated a maturity rating to enable improvement to be measured.

In the agency's 2019-20 Corporate Plan a key activity was to progress the agency's Disability Access and Inclusion Framework outcomes and actions. This was completed in June 2020 and the maturity ratings re-assessed to ensure incremental improvement of accessibility and inclusion.

In addition to the 24 identified actions, an external audit of the agency's website was conducted and improvements were made to improve compliance with World Wide Web Consortium's accessibility standards.

IMPLEMENTATION PROCESS

An updated version of this Plan will be published on the agency's website by 31 October 2020.

The agency intends to establish and maintain a Diversity and Inclusion Committee to build on and progress our commitments to diversity and inclusion.

The agency's management team recognises the importance of diversity and inclusion, and as such has established a standing agenda item for discussion at its weekly meeting.

As part of delivering the strategic priority to 'continue to focus on a strong agency culture that promotes behaviours that align to the agency's values' – the agency's Corporate Plan 2019-20 contained a commitment to progressing this Plan.

Overall responsibility for the implementation of the plan rests with the Commissioner. However responsibility for specific actions will rest with the Deputy Independent Commissioner Against Corruption and employees across all areas of the organisation.

Ultimately, valuing and respecting diversity and inclusion is a responsibility of each employee.

ACKNOWLEDGEMENTS

The Commissioner would like to thank the people who have provided information and feedback or have otherwise supported the preparation of this Plan.

GLOSSARY AND DEFINITIONS

This section includes definitions, abbreviations and explanation of terms that may be unfamiliar and which are used throughout this document.

Disability

In accordance with the *Disability Access and Inclusion Act 2018*⁵ disability in relation to a person, includes long-term physical, psycho-social, intellectual, cognitive, neurological or sensory impairment, or a combination of any of these impairments, which in interaction with various barriers may hinder the person's full and effective participation in society on an equal basis with others.

The *Disability Discrimination Act 1992* (Cth)⁶ defines disability broadly as:

- total or partial loss of the person's bodily or mental functions; or
- total or partial loss of a part of the body; or
- the presence in the body of organisms causing disease or illness; or
- the presence in the body of organisms capable of causing disease or illness; or
- the malfunction, malformation or disfigurement of a part of the person's body; or
- a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or

⁵ *Disability Access and Inclusion Act 2018* (SA) s 3.

⁶ *Disability Discrimination Act 1992* (Cth) s 4.

- a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgement or that results in disturbed behaviour; and
- includes a disability that:
 - presently exists; or
 - previously existed but no longer exists; or
 - may exist in the future (including because of a genetic predisposition to that disability); or
 - is imputed to a person.

Disability Discrimination Act

The *Disability Discrimination Act 1992* (Cth) makes disability discrimination in Australia unlawful. Disability discrimination happens when people living with disability are treated less fairly than people without disability and the discriminator fails to make reasonable adjustments. This includes when people are treated less fairly because they are relatives, friends, carers, co-workers or associates of a person with disability.

Employee

Means a person employed under the *Independent Commissioner Against Corruption Act 2012* (SA) or a person working as a member of staff for the Commissioner, under secondment or a contract for services.

Equal Opportunity Act

The purpose of the *Equal Opportunity Act 1984* (SA) is to promote equal rights, opportunities and access for all South Australians including people living with disability.

Unconscious bias

Refers to social stereotypes about certain groups of people that individuals form outside their own conscious awareness.

Universal design

Universal Design involves creating facilities, built environs, products and services that can be used by people of all abilities to the greatest extent possible without adaptations.

World Wide Web Consortium's accessibility standards

This term refers to the World Wide Web Consortium's internationally recognised standards contained in the Web Accessibility Guidelines.