Disability Action Plan

2014 - 2016

Equity & Equal Opportunity Office
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Final report at 28 November 2016

Federation UNIVERSITY•AUSTRALIA

Disability Action Plan 2014 - 2016

Objective

Federation University Australia (FedUni) is committed to providing an inclusive learning and working environment for people with disability.

'Accessibility, inclusiveness and provision of a supportive learning and research environment are at the heart of Federation University Australia' (Charter 2015).

The University has achieved significant progress in the area of disability over many years. The University also recognises that there are still improvements to be made so that students and staff with disability can experience FedUni on the same basis as those without disability.

The FedUni Disability Action Plan 2014-15 provides clear actions and measurable targets for improvement, and will be used to engage the University community in making improvements across all areas of University operations, to continue to improve accessibility for people with disability in both study and employment and to ensure FedUni is a place where all staff and students can achieve and succeed.

The Plan is guided by the University's Equal Opportunity and Valuing Diversity Policy which states, 'The University will provide reasonable adjustments to the learning and working environment as required, and will strive to apply the principles of inclusion in all of its activities, to ensure all people have equal opportunity to access and participate in University activities.'

Priority Areas

Actions within this Plan have been grouped into three priority areas:

1. Access
    FedUni will aim to ensure that students and staff with disability have equitable access to facilities, services, information and events.

2. Participation
    FedUni will aim to ensure that students and staff with disability have the opportunity to participate equitably in study and employment.

3. Social Inclusive Culture
    FedUni will foster a culture that demonstrates respect and inclusion for people with disability.

Consultation

The development of the Plan included information and consultation from various sources. An anonymous online survey was conducted in November 2013 to obtain staff and student input into areas for improvement. This survey was broadly advertised to the University community and to all students registered with the University Disability Liaison Unit. The Equity and Equal Opportunity Office consulted staff across the University to discuss priority areas and to develop actions.

Disability Action Plan 2014 - 2016

Next Steps

The *Disability Action Plan 2014-2015* will be communicated with students and staff and will be registered as a publicly available document with the Australian Human Rights Commission. Actions will commence immediately and the FedUni Social Inclusion Committee will review progress at regular intervals, the first being in December 2014. Progress reports will be available on the FedUni website in the Equity and Equal Opportunity section. Input from students and staff is encouraged at any time for the next iteration of the Plan. Please email equity@federation.edu.au

Legislation and Associated Documents

The following legislation and documents have aided the development of the Federation University Australia Disability Action Plan:

- Disability Discrimination Act 1992 (Cwth)
- Disability Standards for Education 2005 (Cwth)
- Disability Standards for Access to Premises – Buildings 2010 (Cwth)
- Equal Opportunity Act 2010 (Vic)
- Federation University Australia Equal Opportunity and Valuing Diversity Policy
- Federation University Australia Social Inclusion Plan 2014-2015

Definitions

The following definitions are relevant to the Disability Action Plan, as defined in the University's Equal Opportunity and Valuing Diversity Policy:

Discrimination	Refers to unfair or less favourable treatment based on the following actual or assumed personal characteristics as defined under Commonwealth and State laws: sex, gender identity, marital status, pregnancy, breastfeeding, status as a parent or carer, sexual orientation, lawful sexual activity, race, disability, age, industrial activity, physical features, religious beliefs or activities, political beliefs or activities, criminal record, medical record or personal association with a person who has, or is assumed to have, one of these personal characteristics. This concept includes Direct and Indirect Discrimination.
Direct Discrimination:	Occurs if a person is treated less favourably than another person would be treated in the same or similar circumstances, on the basis of an attribute as listed above.
Indirect Discrimination:	Occurs if there is an unreasonable requirement, condition or practice that someone with an attribute cannot comply with and that a higher proportion of people without that attribute can comply with.

Disability Action Plan 2014 - 2016

Harassment:	Refers to a wide range of deliberate and unintentional behaviours in the teaching, learning, research or workplace environment which may humiliate, intimidate or offend and which are unwelcome and uninvited. It includes behaviour which may be written, verbal, non-verbal or physical (including transmission of inappropriate electronic communications and display of inappropriate material from the internet) and is of a sexual nature or is based on attributes listed under 'Discrimination' above. Harassment has the effect of offending, humiliating or intimidating the person at whom it is directed. It makes the University environment unpleasant and sometimes even hostile. If a person is being harassed, their ability to study and to work effectively is affected.
Disability:	Refers to a total or partial loss of the person's bodily or mental functions; a total or partial loss of a part of the body; the presence in the body of organisms causing disease or illness; the presence in the body of organisms capable of causing disease or illness; the malfunction, malformation or disfigurement of a part of the person's body; a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; 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 presently exists; previously existed but no longer exists; may exist in the future; is imputed to a person.
Reasonable adjustment:	A 'reasonable adjustment' is the term used to describe actions or changes which may be required to enable staff and student participation on the same basis as other staff and students. Lack of provision of reasonable adjustment might constitute discrimination. Adjustments might be necessary where the interaction between the learning and working environment and certain student/staff personal characteristics or circumstances has a negative impact on staff/student participation or achievement. Such characteristics and circumstances include having a disability, carer responsibilities, cultural or religious obligations, being Indigenous, having English as a second language. There is no set definition of what is a 'reasonable' adjustment. Each situation needs to be considered in its own circumstances and on its own merits
On the same basis:	In relation to 'reasonable adjustments', is where a person with a certain personal characteristic or circumstance has opportunities and choices that are comparable with those offered to other people. Being treated "on the same basis" may mean being treated differently, particularly where it is necessary to provide reasonable adjustments.
Principles of inclusion:	Is where learning, working and physical environments are designed to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design, taking into consideration the variety of abilities, disabilities, racial/ethnic backgrounds, and other characteristics of the student and staff body.

Disability Action Plan 2014 - 2016

Access

FedUni will aim to ensure that students and staff with disability have equitable access to facilities, services, information and events.

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
1	An agreed disability access guideline is developed and implemented for all new buildings, minor works and refurbishments.	A guideline is developed and adhered to for all new buildings, minor works and refurbishments.	• Manager, Equity & Equal Opportunity • Manager, Strategic Capital, Infrastructure and Projects • Director, Facilities Services • Executive Director, ICT Services • Coordinator, Disability Services	In progress. SCIP and Facilities Services include disability access considerations in projects (architect briefs, and disability consultants as required) and consult internally with E&EO and Disability Liaison Officer on projects. However work is still progressing on ways to embed this in SCIP and Facilities Services documented processes. Work still to commence to establish processes for ICT projects/upgrades.
2	Update campus maps to include a statement on how to arrange a campus tour to suit individual access needs.	A statement including contact details is included on all campus maps.	• Equity Officer • Disability Liaison Officer	Complete. This project was redefined to produce mobility access maps for the first time for Mt Helen, Gippsland, SMB, Camp Street and Horsham campus. These maps have now become part of the official University maps. This is a significant development for the University.
3	Develop an improved method for communication of buildings and grounds works that impact on access routes.	An improved method of communication is developed and implemented.	• Facilities Manager, Building Services	In progress. From 1 January 2017, Facilities Services will communicate outages, works and changes to accessible routes to all students and staff. Facilities Services staff at Ballarat, Gippsland and Wimmera campuses will be able to send an email notification to affected campuses where an issue is identified and reported.
4	Include disability considerations in the signage and way-finding project managed by Strategic Capital, Infrastructure and Projects (SCIP) in 2014.	Disability considerations are communicated to the Project Manager and Project Consultants as part of the Way-finding and Signage Project.	• Manager, Equity & Equal Opportunity • Equity Officer • Director, Student Connect	Complete. Disability considerations were communicated with Project Consultants including need for signage for disability access routes and lifts. Ultimately, these were not included in the final outcome, however they formed the basis of new disability access maps. Refer Action Item 2

Disability Action Plan 2014 - 2016

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
5	Conduct a review of recruitment processes to determine if any improvements are necessary to support prospective staff with disability.	A review is conducted and recommendations made to the Director, HR.	• Manager, Human Resources • Manager, Equity & Equal Opportunity • Equity Officer	Complete. An active partnership between Human Resources, Equity & Equal Opportunity and the National Disability Recruitment Coordinator (NDRC) has resulted in disability considerations and prompts being embedded into each stage of the FedUni recruitment process. Human Resources staff participated in disability awareness training in July 2016, facilitated by the NDRC.
6	Ensure that the Federation University Australia website is as accessible as possible.	Achieve AA rating using the Web Content Accessibility Guidelines 2.0 by the end of 2014.	• Team Leader, Digital and eLearning, ITS	In progress, ongoing. Centrally managed areas of the website have been modified so most components achieve AA rating. However there are still components that are only A rating. A new design is being implemented in late 2016 that should address the components that are currently an A rating. Although templates, guidelines and training are in place, a constant AA rating across all areas of the website cannot be guaranteed due to the nature of the publishing model where there are over 150 publishers adding content and creating pages. Accessibility checking is conducted by the Digital and eLearning team.
7	Provide training and resources for web publishers on the Web Content Accessibility Guidelines 2.0	Training is offered at Ballarat and Gippsland campus.	• Coordinator, Web Development	Complete. The web publisher training now includes an accessibility module.
8	Web accessibility guidelines are regularly reviewed to ensure information adheres to Web Content Accessibility Guidelines 2.0	Guidelines are reviewed annually.	• Coordinator, Web Development	Complete. Guidelines were reviewed mid-2016 and will be reviewed on an ad-hoc basis as needed.
9	Software programs/applications that improve website accessibility compliance are investigated.	Install upgraded version of Content Management System which includes accessibility auditor.	• Corporate Web Team	Completed in December 2014. The Content Management System was upgraded to include an accessibility auditor.

Disability Action Plan 2014 - 2016

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
10	Review Moodle default configurations to ensure compliance with the Web Compliance Accessibility Guidelines 2.0	Default configurations are reviewed and findings implemented by December 2014.	• Manager, Learning Futures and E-learning	Ongoing. The Moodle platform has some accessibility issues that are being improved with each version that is released. The FedUni theme has been developed to comply with the accessibility guidelines and future theme development will ensure continued compliance. Content is not yet confirmed as compliant.
11	Increase diversity in marketing materials and publications including students with disability.	Marketing materials and publications reflect diversity including age, disability, ethnicity, physical appearance.	• Manager, Marketing and Communications	Partially complete. There is a much stronger focus on diversity from within the Marketing team, achieving greater diversity in marketing materials and publications. Significant progress has been made, with recognition that further work needs to occur.
12	Conduct a review of student recruitment and marketing materials that are available to students and prospective students to ensure disability services information is included.	Materials have been reviewed and disability services information is included where required.	• Manager, Marketing and Communications	Complete for the University Course Guide which now includes disability support information for prospective students. Smaller publications and online marketing materials to be reviewed and further developed.
13	Implement a process where prospective students and guests with disabilities can register for adjustments/needs for University events.	A process is developed and implemented by Marketing (Events) in the first instance.	• Manager, Marketing and Communications	In progress. The guideline for accessible events and activities (see below), which includes guidance on seeking disability adjustment information has been widely publicised. For events that are published through the CRM, the registration template automatically includes an invitation to register disability adjustments/needs. However, not all events use the CRM or the registration form. Full implementation planned for 2017.
14	A guideline for accessible events and activities is developed.	Guidelines are developed in consultation with, and provided to, Marketing, Public Relations, Student Connect and Campus Life for the initial roll-out.	• Equity Officer	Complete. A comprehensive online guide and checklist to accessible events has been developed, published and embedded in the CRM Events approval process. The online guide has been promoted widely throughout the University, recognising further promotion is needed in some areas.
15	Disability services information is available to students prior to enrolment.	Information on accessing disability services is available prior to enrolment.	• Coordinator, Disability Services • Equity Officer	Complete. Prospective students can now view information on support and services, including disability support on the Future Students webpages, and when they accept an offer online from FedUni.

Disability Action Plan 2014 - 2016

Participation

FedUni will aim to ensure that students and staff with disability have the opportunity to participate equitably in study and employment.

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
16	Implement Learning Access Plans for students requiring reasonable adjustments to improve communication and timeliness between the student, academic staff and the Disability Liaison Unit.	Learning Access Plans are implemented for all Disability Liaison Unit clients.	• Coordinator, Disability Services	Complete. Learning Access Plans (LAP) have been implemented for all clients since March 2014. The Disability Liaison Unit continues to refine the process for the use of Learning Access Plans. In 2016, a new process was implemented for students to access their own LAPs and related documentation from the Disability Liaison Unit on a secure network, allowing students more control in sharing LAPs with academic staff, and accessing learning materials.
17	Investigate centralised disability adjustment funding for staff, similar to the maternity leave central fund.	Decision is made on whether to implement a centralised disability fund for staff.	• Manager, Equity & Equal Opportunity	Complete. A centralised central fund has been established, and commenced in 2016. The Workplace Adjustments for Staff with Disability Procedure has been developed to provide the framework for implementing the funding.
18	Establish a process for staff to request reasonable adjustments for disability.	A process is developed and communicated with staff.	• Senior Human Resources Advisor • Manager, Equity & Equal Opportunity • Equity Officer	Complete. The Workplace Adjustments for Staff with Disability Procedure has been developed and was approved in November 2016. The procedure provides the framework for new and existing staff to request adjustments.
19	Review current processes for enabling participation by staff with disability in internal professional development activities and develop recommendations for improvement.	Current processes are reviewed and recommendations (if any) are made to relevant responsible areas.	• Manager, Equity & Equal Opportunity • Equity Officer	In Progress. Current processes have been reviewed and recommendations have been raised with Human Resources to include in promotion and registration processes for HR staff development activities. An online guide to accessible events has been developed and promoted widely throughout the University which includes professional development programs.
20	Develop a process for employing large numbers of casual staff in the Student Futures Program that is inclusive to people with disability.	A process is developed and implemented for the commencement of 2015.	• Manager, Student Futures Program	Complete. A full recruitment review was undertaken in consultation with HR, Equity & Equal Opportunity and Student Advisory Service. New recruitment processes for casual staff have been developed and implemented to ensure processes are inclusive to people with a disability.

Disability Action Plan 2014 - 2016

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
21	Review existing Moodle training resources for academic staff to ensure they contain information on web accessibility.	A review is conducted and findings implemented by December 2014.	• Manager, Learning Futures and E-learning	In Progress. New training for academic staff in 2017 will include accessibility considerations for online course design and development.
22	Promote disability services to students within Moodle.	A link to the Disability Support webpage is visible to students using Moodle.	• Manager, Learning Futures and E-Learning	Complete. A link has been created in the Moodle menu to the current student website which contains disability and support services information.
23	Develop a process for Partner Providers to use when implementing reasonable adjustments for students with disability.	A process is established and communicated with Partner Providers.	• Coordinator, Disability Services	Complete. A Partner Provider Disability Resource Kit has been developed, implemented and communicated to Partner Providers and Dual Sector Partnership organisations. The Resource Kit includes information, processes and templates for Partner Providers to implement reasonable adjustments for disability.
24	Provide information to Partner Providers to ensure they are aware of their obligations to provide reasonable adjustments to students with a disability and any relevant FedUni processes that need to be used.	The operating manual / handbook for Partner Providers includes information on equal opportunity, discrimination and disability responsibilities and processes.	• Manager, Partner Relationships • Equity Officer	Complete. The 2015 Operational Manual for Partner Providers (PP) includes information on PP responsibilities relating to discrimination, harassment, disability, reasonable adjustments. The document is emailed to PP and is available on the Moodle shell for all Partner stakeholders. A Partner Provider Disability Resource Kit has also been developed, implemented and communicated to Partner Providers and Dual Sector Partnership organisations. The Resource Kit includes information, processes and templates for Partner Providers to implement reasonable adjustments for disability.
25	Review the provisions for achievement relative to opportunity in the Academic Promotions Procedure from a disability perspective.	The provisions in the Academic Promotions Procedure are reviewed and recommendations (if any) are made to the Director, Human Resources (Policy Sponsor).	• Manager, Equity & Equal Opportunity	Commenced. The wording in the Procedure is inclusive of disability considerations. However further review is needed in how the Procedure applies in practice.

Disability Action Plan 2014 - 2016

Social Inclusion Culture

FedUni will foster a culture that demonstrates respect and inclusion for people with disability.

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
26	Communicate accessibility information and requirements to web publishing and University community through quarterly newsletters, targeted training sessions, email communications, inclusion of accessibility into web publishing guides, FedUni news and events.	Accessibility information is communicated to web publishing and University community.	• Coordinator, Web Development	Complete and ongoing. In 2015 and 2016 quarterly newsletters included articles on accessibility. Newsletters were distributed to staff on FedNews and were available on the web publishing area of the corporate website. Web support issues were identified and communicated to web publishers. Accessibility information was reviewed and updated in the web publishing area of website.
27	Professional development of Web Team staff includes web accessibility training.	Three team members attend training delivered by Vision Australia in 2014.	• Team Leader, Digital and eLearning, ITS	Complete. Three staff members have attended training delivered by Vision Australia.
28	Provide staff information/education relevant to the implementation of Learning Access Plans.	Professional development is offered formally and informally across campuses.	• Coordinator, Disability Services	Complete and ongoing. The Disability Liaison Unit staff have presented at staff development days, team meetings and provided individual education where identified. Academic staff can now identify their students with Learning Access Plans when generating class lists, thus improving communication and implementation of adjustments.
29	Develop a training module for staff that covers Learning Access Plans and DLU processes.	A training module is developed and implemented by February 2015.	• Coordinator, Disability Services	Complete. The Disability Liaison Unit and FedUni's Centre for Learning Innovation and Professional Practice have collaborated to develop an online staff development program for disability education which includes Learning Access Plans.

Disability Action Plan 2014 - 2016

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30	Promote awareness of student rights and responsibilities in relation to reasonable adjustments with Partner Providers and students.	Partner Providers are provided with information for students on Student Rights and Responsibilities which includes equal opportunity, discrimination and reasonable adjustments.	• Manager, Partner Relationships • Equity Officer	Complete. In 2014 & 2015, equity rights and responsibilities brochures were sent to Partner Providers (PP) to be available to students at enrolment centres. In 2016, information on equity rights and responsibilities was included in: 1) the orientation template for PP 2) the Information for Students Studying at Partners guide (made available to students at orientation). 3) the Operational Manual for PP which states that PPs need to make this information available to students.
31	Staff in the Student Careers and Employment Service will participate in professional development to be more proactive and responsive to students with disabilities.	Staff have participated in professional development relevant to students with disabilities.	• Manager, Careers & Employment	Complete and ongoing. Selected staff attended The Australian Network on disability conference in Geelong 31 July 2014, and the NAGCAS Diversity event in Melbourne on 24 October 2014. Open discussions have been had across the team about supporting students with disabilities and increased cross referral and support through the DLU has resulted. New induction process is in place to include disability support professional development for new members of the team. In 2016, an intake form is in place for new students in Careers & Employment to incorporate consent to share relevant information with the Disability Liaison Unit for supports needed for workplace preparation. Structures are in place to support students with disability in the Industry Placement Program with reasonable adjustments.
32	Provide 2 day training sessions for staff and students in Mental Health First Aid.	Training sessions are offered to staff and students across FedUni campuses in 2014.	• Counselling and Mental Health Programs Coordinator	Complete and an ongoing action. The Counselling service has continued to offer Mental Health First Aid (MHFA) training to students and staff. In 2015, 9 courses were delivered. In 2016, courses were delivered in Ballarat, Gippsland and Horsham. There were 6 staff courses and 5 student courses. In addition, 3 blended-delivery MHFA courses for tertiary students were delivered in 2016, being 10 hours online and 3 hours face to face.

Number	Action	Progress Target	Action Officer/s	Final status at 28 November 2016
33	Employees in the Student Futures Program participate in training relating to equal opportunity, disability and reasonable adjustments.	Initial roll out in mid-2014 with full implementation by February 2015.	• Manager, Student Futures Program	Complete. The Student Futures team have combined student leader online training into one Moodle shell, which includes a section on equity & equal opportunity and disability. This is reinforced during face-to-face training, with scenario based role plays reinforcing the online training.
34	Continuing and fixed-term staff to complete Equity training which includes disability and reasonable adjustments.	85% of all continuing and fixed-term staff have completed the online equity training.	• Equity Officer	Complete and an ongoing action. Completion rate is currently 88%.
35	Implement a monitoring system for the Disability Action Plan.	The Disability Action Plan is reviewed annually and an update is published on the Equity website.	• Social Inclusion Committee	Complete. The FedUni Social Inclusion Committee reviewed the progress of the Disability Action Plan in December 2014 and September 2015. Progress reports and highlights were noted by University Council and communicated to staff and students on both occasions. Once endorsed by the Social Inclusion Committee, this final plan (November 2016) will be provided to the Vice-Chancellor and University Council, then communicated to staff and students via FedNews. The final plan will remain on the University's Equity & Equal Opportunity website.