



# Disability Access and Inclusion Plan Draft plan

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## Version history

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1.0	September 2020	Draft version of DAIP prepared for public consultation	Rachel Wilkinson, Human Resources Officer and Lucas Williams, Senior Legal Officer	14

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## Statement from the Chief Executive Officer

As the Essential Services Commission's (**Commission**) Chief Executive Officer, I am pleased to share this Disability Access and Inclusion Plan (**DAIP**). This DAIP has been prepared in accordance with, and in support of, the requirements of the *Disability Inclusion Act 2018* (**DI Act**). Through the implementation of this DAIP, I confirm the Commission's commitment to furthering the goals and objectives of the Inclusive SA: State Disability Inclusion Plan 2019 – 2023 (**State Plan**), the National Disability Strategy (**NDS**) and the United Nations Convention on the Rights of Persons with Disabilities (**UNCRPD**).

Protecting the long-term interests of South Australian consumers with respect to the price, quality and reliability of essential services is at the heart of our work at the Commission. Through this work, I acknowledge that, for many South Australian's living with disability, there can be unique challenges in accessing these essential services and the consumer protections that the Commission provides.

I also acknowledge and confirm the central importance of stakeholder engagement in the Commission's regulatory processes - the best possible evidence and information for our decision making comes from the widest and most diverse range of people. Our aim is to make our work and our regulatory processes open and accessible to all, encouraging and facilitating participation so as to ensure that we have and are able to take into account that wide and diverse range of information and views.

Finally, I acknowledge the benefits that a diverse and inclusive workplace provides, not only to the Commission, but to the wider South Australian community. Promoting and developing a diverse and inclusive workplace is fundamental in the achievement of the Commission's business purpose and objectives. As a result, I am committed to continuing to foster a workplace that recognises, supports and values the individual differences of our employees.

Adam Wilson  
Chief Executive Officer

# 1 Contact details

- 1.1 If you wish to contact the Commission about this Disability Action Inclusion Plan (DAIP), or any other matters relating to supporting people living with disability, this may be done in any of the following ways:
- ▶ by sending an email to [escosa@escosa.sa.gov.au](mailto:escosa@escosa.sa.gov.au).
  - ▶ by telephoning the Director, Corporate Services on (08) 8463 4444 to discuss the DAIP on the telephone or to arrange a meeting, or
  - ▶ by posting correspondence to Level 1, 151 Pirie Street Adelaide SA 5000 or GPO Box 2605 Adelaide SA 5001.
- 1.2 This DAIP is available on the [Commission's website](#). If you require a copy in an alternative format (such as a hard copy mailed to you via Australia Post or an electronic copy sent to you via email), Easy Read, large font, electronic format (disk or emailed), audio or Braille), please contact the Director, Corporate Services through any of the communication methods above.

## 2 Our organisation

- 2.1 The Commission is a statutory authority established as an independent economic regulator and advisory body under the *Essential Services Commission Act 2002*.
- 2.2 The Commission's primary objective is the protection of the long-term interests of South Australian consumers with respect to the price, quality and reliability of essential services.
- 2.3 The Commission regulates the provision of essential services in the water and sewerage, electricity, gas, maritime and rail industries, conducts formal public inquiries and provides advice to Government on economic and regulatory matters.
- 2.4 The Commission adds benefit to the South Australian community by ensuring that consumers of regulated services are adequately protected and that entities are accountable for their services, while not imposing unnecessary regulatory costs and burdens.
- 2.5 The Commission provides independent advice to Government to inform and provide an evidence base for policy making and public consideration of economic and regulatory issues.

## 3 Staff profile

### 3.1 Staff living with disability

- 3.1.1 As at 30 June 2020, the Commission employed 32 staff. These employees possess a range of professional and technical skills in areas including economics, law, public policy, engineering and finance.
- 3.1.2 At this time, the Commission does not have any staff that have declared that they are living with disability.

## 4 Strategic context

- 4.1 In preparing and implementing its DAIP, the Commission acknowledges and seeks to further the goals of the DI Act, the State Plan, the NDS and the UNCRPD.
- 4.2 Further, the Commission acknowledges and addresses, within this DAIP, the particular risks that relate to women, children, Aboriginal and Torres Strait Islander people and culturally and linguistically diverse people living with disability.
- 4.3 The Commission is committed to:
  - 1.1.1 supporting all people living with disability to access essential services on fair and reasonable terms that meet their individual needs,
  - 1.1.2 engaging with people living with disability when drafting Codes and Guidelines and when undertaking all other regulatory activities,
  - 1.1.3 ensuring that people living with disability can access the mainstream supports and services provided by the Commission, in particular, by providing information in accessible formats and undertaking public consultation in a way that people living with disability can fully participate, and
  - 1.1.4 promoting a workplace that supports the opportunities for people living with disability to obtain employment at the Commission.

## 5 Our vision

- 5.1 The Commission, in developing and implementing this DAIP, aims to:
  - 5.1.1 continue the Commission's work to develop and enforce industry standards and protections for all South Australian consumers of essential services, including those who are living with disability,
  - 5.1.2 assist people living with disability to access all of the resources and services offered by the Commission, and
  - 5.1.3 support the employment of people living with disability and acknowledge the benefits to be gained from an inclusive workplace for both the Commission and the wider community.

### 5.2 Responsibility for the implementation of the DAIP

- 5.2.1 The Commission's Chief Executive Officer is responsible for the implementation of its DAIP.
- 5.2.2 The actions outlined in this DAIP identify the functional groups that will lead those allocated actions that are to be implemented.

## 6 Actions

### 6.1 Outcome 1 – Inclusive and accessible communities

Social inclusion is a priority for people living with disability, as it affects all aspects of their lives. It is our aim that the contributions and rights of people living with disability are valued and understood by all South Australians, and that their rights are promoted, upheld and protected. We also want to ensure that people living with disability are supported to advocate for their own rights. We aim to ensure that all views, evidence and information are valued and considered in our work, and that all of our public material, including consumer protection frameworks, are inclusive of and accessible to all South Australians.

**Priority 1:** Involvement in the community

**Priority 2:** Improving community understanding and awareness

**Priority 3:** Promoting the rights of people living with disability

Actions	Responsibility	Timeframe	Measurable target
The Commission's website will be independently reviewed against the Web Content Accessibility Guidelines.	Corporate Services Group	June 2021	The Commission website has been reviewed independently to assess its conformance with the Web Content Accessibility Guidelines version 2.0.
Commission publication templates will be reviewed to assess their accessibility for people who live with a range of disabilities, including vision impairment.	Corporate Services Group	June 2021	Commission publications templates will be reviewed and updated.
Commission publications will, where possible, continue to be prepared using clear and inclusive plain English language.	Lead by the Corporate Services Group in collaboration with all functional groups	Ongoing	Commission publications will be preparing following principles of the Commission's own Style Guide Manual and, where possible, the Australian Government Style Manual.
From 1 December 2020, all Commission documents published on the Commission's website will be available for review with Readspeakr.	Corporate Services Group	From 1 December 2020 and then ongoing	All Commission documents published after 1 December 2020 are available for review with Readspeakr.
The Commission will hold a staff presentation to increase staff awareness of the challenges experienced by people living with disability, particularly in relation to their access to services regulated by the Commission. This will be provided by an external person or agency (such as disability support or advocacy service).	Corporate Services Group	December 2020	A staff presentation is held.

## 6.2 Outcome 2 – Leadership and collaboration

People living with disability want to have a greater role in leading and contributing to government and community decision-making. It is our aim that the perspectives of people living with disability are actively sought and that they are supported to participate meaningfully in government and community consultation and engagement activities. We aim to collaborate as widely as possible with the South Australian community in the development, implementation and evaluation of our regulatory frameworks. We will continue to provide all South Australians with the opportunity to participate in these processes.

**Priority 4:** Participation in decision-making

**Priority 5:** Leadership and raising profile

**Priority 6:** Engagement and consultation

Actions	Responsibility	Timeframe	Measurable target
The Commission will endeavour to have disability groups better represented on the Consumer Advisory Committee.	Office of the Chief Executive Officer	May 2021	Proactive measures are taken to ensure disability representatives/advocates are given the opportunity to be part of the Consumer Advisory Committee and that a diverse range of community groups and interests are represented.
The Commission will continue to promote and foster diversity and cultural awareness within the workplace.	Leadership Team and managers	Ongoing	Staff are aware of the benefits of promoting workplace diversity.
The Commission will maintain involvement with domestic violence support services with particular regard to victims living with disability.	Commission's White Ribbon Committee	Ongoing	Contact is maintained with relevant groups with any updates and educational material provided to all staff.
The Commission will develop a list of agencies or groups that can assist in understanding the needs of consumers who are living with disability, including specific groups that specialise in assisting Aboriginal and Torres Strait Islander people, children, women, cultural and linguistically diverse people and children who are living with disability.  These agencies or groups will then be contacted when the Commission is public consultation following the release of a draft Code, Guideline or other consumer protection publication.	Lead by the Corporate Services Group in collaboration with all functional groups.	February 2021	A list of relevant agencies or groups is created.  The relevant agencies or groups are contacted for consultation when required.

### 6.3 Outcome 3 - Accessible communities

The accessibility of the built environment, quality services and information is key to ensuring people living with disability are included and have the opportunity to equally participate in all aspects of community life. It is our aim to increase accessibility to public and community infrastructure, transport, services, information, sport and recreation and the greater community. We do this by being transparent in our regulatory work, consulting with the widest possible range of consumers and other stakeholders across the State and making our consumer protection information is accessible to all.

**Priority 7:** Universal Design across South Australia

**Priority 8:** Accessible and available information

**Priority 9:** Access to services

Actions	Responsibility	Timeframe	Measurable target
Where any modifications of building or work facilities is undertaken and where any issues of access and use of facilities are identified then, where practicable, the Commission will improve existing accessibility using universal design principles.	Corporate Services Group	Ongoing	Accessibility to the Commission's premises and facilities is appropriately addressed.
The Commission will, where it is reasonably practical to do so, arrange for Commission publications to be converted into an alternate format, such as braille or large font print, upon request.	Corporate Services Group	Ongoing	Alternate formats of Commission publications are provided upon request and where it is reasonably practical to facilitate the request.
The Commission will endeavour to hold all events and external public consultation activities will be held at locations that are accessible by all, including people living with disability.	Lead by the Corporate Services Group in collaboration with all functional groups.	Ongoing	Where possible, Commission events are held at appropriate locations and no people are unable to attend due to accessibility issues.
The Commission will endeavour to ensure that all external public consultation activities have virtual access capabilities for people unable to physically attend the event.	Lead by the Corporate Services Group in collaboration with all functional groups.	Ongoing	Where possible, appropriate virtual access arrangements are in place for external public consultation events.

## 6.4 Outcome 4 – Learning and employment

Workforce participation is fundamental to social inclusion. It provides economic independence and choice, social connections and friendships, value, identity and belonging. It is our aim that people living with disability have access to inclusive places of study and that education and training provides pathways to meaningful and inclusive employment and volunteering opportunities. We value diversity and inclusion in our workforce and recognise that it is this that helps us to bring out the best in our people and deliver in our role as an independent economic regulator.

**Priority 10:** Better supports within educational and training settings

**Priority 11:** Skill development through volunteering and support in navigating the pathway between learning and earning

**Priority 12:** Improved access to employment opportunities and better support within workplaces

Actions	Responsibility	Timeframe	Measurable target
The Commission will review the key conditions of employment policies relevant to recruitment to ensure that the recruitment processes are accessible and responsive to the needs of all applicants and employees, including those living with disability.	Corporate Services Group	May 2021	Appropriate recruitment policies and practices that encourage and increase inclusion and participation by existing and potential staff are in place.
The Commission will promote the DAIP to all existing and new employees.	Corporate Services Group	Ongoing	Information about the DAIP is included in the induction program and available on the Commission's intranet.
The Commission will provide for assessments of workstation appropriateness as required and respond to individual employee needs for workplace modifications in a timely manner.	Corporate Services Group	Ongoing	The accessibility and appropriateness of both individual workspaces and the worksite as a whole are assessed by a qualified individual with workplace modifications undertaken as required.
The Commission will provide existing staff with the opportunity to complete an e-learning module regarding disability awareness and the module will be added to the induction process for new employees.	Corporate Services Group	Ongoing	A record of existing staff participation in the e-learning is kept and all new staff complete the e-learning as part of the induction process.

## 7 DAIP development

### 7.1 Consultation

- 7.1.1 The Commission will publically consult on this DAIP for a period of four weeks.
- 7.1.2 At the commencement of this public consultation period, the Commission's draft DAIP will be accessible through the:
  - 7.1.2.1 Commission's website and intranet, and
  - 7.1.2.2 South Australian Government's YourSAy platform.
- 7.1.3 The Commission will also notify consumers of the release of the draft DAIP by:
  - 7.1.3.1 contacting the South Australian Government's Disability Engagement Group
  - 7.1.3.2 notifying subscribers to the Commission's website through a news email update, and
  - 7.1.3.3 providing copies of the plan to organisations and advocacy groups that provide assistance to priority groups living with disability including women, children, Aboriginal and Torres Strait Islander people and culturally and linguistically diverse people.

### 7.2 Submissions

- 7.3 The Commission invites written submissions from members of the community on this paper. Submissions should be provided by **Wednesday, 30 September 2020**.
- 7.4 Responses to this paper should be directed to: **Draft Disability Access and Inclusion Plan**.
- 7.5 Submissions can be provided by:
  - 7.5.1 email to [escosa@escosa.sa.gov.au](mailto:escosa@escosa.sa.gov.au)
  - 7.5.2 telephoning (08) 8463 4444 or freecall 1800 633 592 (SA and mobiles only) to provide feedback over the telephone or to arrange a face to face meeting
  - 7.5.3 posting correspondence to GPO Box 2605, Adelaide SA 5000
  - 7.5.4 delivering correspondence to Level 1, 151 Pirie Street, Adelaide SA 5000
- 7.6 It is the Commission's policy to make all submissions publicly available via its website ([www.escosa.sa.gov.au](http://www.escosa.sa.gov.au)), except where a submission either wholly or partly contains confidential or commercially sensitive information provided on a confidential basis and appropriate prior notice has been given.
- 7.7 The Commission may also exercise its discretion not to publish any submission based on length or content (for example containing material that is defamatory, offensive or in breach of any law).

## 7.8 Relationship to other policies, strategies, frameworks

7.8.1 The DAIP will support and complement the Commission's existing policies and procedures that aim to support access, inclusion and flexibility for staff living with disability (or caring for a person living with disability). These include the:

- ▶ Fair Treatment in the workplace policy
- ▶ Attendance and hours at work policy
- ▶ Purchased leave policy
- ▶ Leave policy
- ▶ Domestic violence policy
- ▶ Diversity Statement, and
- ▶ Workforce Plan 2020-2023.

7.8.2 Additionally, the DAIP will operate concurrently with the ongoing consumer protection work of the Commission.

## 7.9 Examples of previous achievements

7.9.1 In 2015, the Commission developed its formal Diversity Statement, acknowledging the importance of, and confirming its commitment to, increasing diversity and inclusion in the workplace.

7.9.2 In 2016, prior to the passing of the DI Act, the Commission developed and implemented its first Disability and Access Inclusion Plan.

7.9.3 In 2018 the Commission began work to become a White Ribbon accredited workplace, confirming its commitment to assist in ending domestic violence, including that which is experienced by those living with disability. The Commission became a White Ribbon accredited workplace in 2020.

7.9.4 Through its Consumer Advisory Committee, the Commission has links to community services, including those which provide disability support services. Through these links, the Commission aims to identify and understand the needs of essential services consumers that are living with disability.

7.10 The Commission seeks to build on these previous achievements and to continually improve its knowledge of the needs of essential services as it relates to consumers living with disability, undertake its regulatory activities to assist consumers living with disability, and to foster a workplace that utilises the skills and talents of people living with disability.

## 8 Review

- 8.1 The DAIP will be reviewed every four years, unless legislative change or amendment to the State Plan requires an earlier review.

Approved

A handwritten signature in black ink, appearing to read 'AW', with a long horizontal flourish extending to the right.

Adam Wilson

**Chief Executive Officer**

03 / 09 / 2020



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