

Manual No M1281

**Disability Action and Inclusion Plan 2021 - 2024**

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# 1.0 Amendment Record

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| --- | --- | --- | --- |
| **Date** | **Section** | **Description of Change** | **Doc Version** |
| 24 April 2013 | All | Initial Issue | 1.0 |
| 30 June 2014 | All | New Format, logo and font style | 1.1 |
| 02 Sept 2015 | All | Plan updated | 2.0 |
| 21 Jan 2019 | All | Review and updated | 3.0 |
| 6 April 2021 | All | Review and updated | 4.0 |

# 2.0 Synopsis

Guide Dogs SA/NT is committed to providing high quality integrated services to individuals who are blind, vision impaired, and deafblind, and children with autism eligible for Autism Assistance Dogs living in South Australia and the Northern Territory. This Disability Action & Inclusion Plan (DAIP) represents a further step in the commitment the organisation is making towards its overall mission.

This plan is a living document. It assists Guide Dogs SA/NT to systematically address matters related to disability access, as well as making services and information more accessible to clients. It enables Guide Dogs SA/NT to fulfil the requirements of the Service Agreement with the South Australian Department for Communities and Social Inclusion, and to achieve compliance under the provisions of both the National Disability Discrimination Act (1992) andthe South Australian Equal Opportunity Act (1984).

The action plan incorporates six key objectives, ranging from physical and communication/ information access to responsive organisational culture and client participation/involvement. It includes a number of major outcomes the organisation aims to achieve over the following three year period, as well as a list of specific actions to help the organisation direct its efforts.

The plan is consistent with Guide Dogs SA/NT’s broader vision, values and strategic directions. All management and staff are committed to its implementation, maintenance and success.

# 3.0 Preamble

In keeping with the principles of the South Australian Disability Services Act (1993), Guide Dogs SA/NT is committed to the following principles:

* 1. People with disabilities are individuals, no matter how they acquired their disability, what sort of disability they have or how severe their disability is.
  2. People with disabilities have the right to be respected and treated with dignity.
  3. People with disabilities have the same human rights and responsibilities as any member of the Australian community.
  4. People with disabilities have the same rights as any member of the Australian community to realise their potential for intellectual, physical, social, emotional, sexual and spiritual development.
  5. People with disabilities have the same rights as any member of the Australian community to make their own decisions about their lifestyle.
  6. People with disabilities have a right to be protected from neglect, abuse, intimidation and exploitation.
  7. People with disabilities have the same rights as any member of the Australian community to access the assistance and support that will enable them to exercise their rights, discharge their responsibilities and attain a reasonable quality of life.

### The Disability Discrimination Act (1992)

Guide Dogs SA/NT recognises the definition of “disability” provided in the Disability Discrimination Act 1992.

People who have a disability might have:

* total or partial loss of the person’s bodily or mental functions
* 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.

Guide Dogs SA/NT will conduct its business in a way that:

* Promotes an increased awareness of the rights, needs, and contribution by people with disabilities as valued members of the community.
* Supports access and equity for all South Australians with disabilities and prevents discrimination on the basis of age, gender, sexuality, race, ethnicity, religion, language and culture
* Ensures that the interests of people with disabilities are always considered in the planning and provision of services and programs.
* Takes measures to make the physical environment accessible and provides access to information and communication for people with disabilities.
* Works collaboratively with people with disabilities and in partnerships with other agencies, service providers, professional groups, educational institutions, and other community organisations to ensure that the highest levels of services appropriate to the needs of people with disabilities can be provided.
* Facilitates equal opportunities for people with disabilities in the field of employment or volunteering opportunities across our services and programs.
* Ensures training of staff and volunteers involved in the planning and provision of programs and services as important elements of promoting full participation and equality for people with disabilities.
* Advances equal opportunity for people with disabilities by striving for continuous quality improvement in the implementation of disability action & inclusion plans.

# 4.0 About Guide Dogs SA/NT

Guide Dogs SA/NT provides a range of integrated services to people of any age who are blind, vision impaired, or deafblind living in South Australia and Northern Territory. Guide Dogs SA/NT also provides Autism Assistance Dogs to children with Autism under the age of eight in South Australia. Services provided include:

Guide Dog Services

* Guide Dogs
* Autism Assistance Dogs
* Assistance Dogs (SA only)
* Community education and awareness

Vision Services

* Orientation and mobility services
* Low vision services
* Neurological vision services
* Occupational therapy
* Community education and awareness
* Assistive technology

Anyone can make a referral to Guide Dogs SA/NT, including self-referral. Referrals can also come from:

* Medical and Allied Health professionals
* Teachers
* Family or carers
* Friends

Referrals can be made by online form phone, email, fax, or in person at our office in Adelaide or through our Consumer Support Line

|  |  |  |
| --- | --- | --- |
|  | Online Form | [Request a service - Guide Dogs SA/NT](https://www.guidedogs.org.au/request-a-service/) |
|  | Support Line (Ph): | 1800 757 738 |
|  | Email: | [yoursupportline@guidedogs.org.au](mailto:yoursupportline@guidedogs.org.au) |
|  | SMS: | 0457 521 521 |
|  | Address: | 251 Morphett Street, Adelaide SA 5000 |

All of our services are responsive to the diversity of languages, literacy levels, and communication styles and cultures that contribute to Australian society.

For more information about Guide Dogs SA/NT, please visit our website: [www.guidedogs.org.au](http://www.guidedogs.org.au/).

# 5.0 Action Plan Development

* Information from the Access Appraisal Report 2015

The following documents were used as a guide for developing this action plan:

* Relevant data from client satisfaction surveys
* Australian Human Rights Commission – guide for DAP development
* Department of Human Services
* National Disability Services (NDS) Workshops and associated handout
* Inclusive SA – State Disability Inclusion Plan 2019-2023
* DHS –Disability Access and Inclusion Plan 2020-2024

# 6.0 Internal Responsibility and Reporting

The Business Operations Manager and the Chief Operating Officer are responsible for implementing this plan and reviewing complaints about disability discrimination. However, all Guide Dogs SA/NT staff share responsibility for its practical implementation. This dynamic plan relates to everything Guide Dogs SA/NT does, and all management and staff are involved in and committed to its maintenance and success.

Progress on the development and implementation of the plan will be monitored by the Service Delivery Committee (Board sub-committee) and report to the Board via the Chief Executive Officer, and will be included in the Guide Dogs SA/NT Annual Report.

# 7.0 Objectives

The Guide Dogs SA/NT DAIP has six objectives as follows:

* 1. Program Access: To provide equitable access opportunities for clients in SA and NT to take full advantage of the range of programs and services offered by the organisation. Refer section 8.1.
  2. Accessible Information: To ensure our information and communication are as accessible as possible to all people, including those with disability. Refer section 8.2.
  3. Responsive Organisational Culture: To ensure services to clients with disability are delivered with awareness and understanding. Refer 8.3.
  4. Client Participation: To involve clients in a meaningful way in all levels of the organisation’s activities including the planning, delivery and evaluation of service programs. Refer section 8.4.
  5. Accessible Workplace Practices: To ensure people with disability have equal access to employment and volunteering opportunities offered by Guide Dogs SA/NT. Refer section 8.5.
  6. Meeting Legislative Requirements: To comply with requirements under the Disability Discrimination Act (1992), the Guide Dogs SA/NT (DAIP) includes details of:
* Objectives and action programs to achieve the aims of the DDA
* Ways of evaluating and revising these policies and programs
* Plans to communicate these policies and programs to staff
* The mechanisms for review of procedures and practices within the organisation with a view to identifying discriminatory practices
* Intended outcomes and performance indicators against which the success of the (DAIP) may be assessed
* Persons within the organisation who have been given responsibility for implementing the provisions outlined above.

Refer section 8.6

# 8.0 Action Plan

## 8.1 Access to Our Programs and Services

Guide Dogs SA/NT is dedicated to ensuring the range of services it offers is accessible to people who require them. Guide Dogs SA/NT is committed to providing unrestricted physical access for staff, clients and visitors within all owned and rented facilities. Guide Dogs SA/NT recognises access is more than simply physical access to facilities, but encompasses service entry or commencement, service use and, where relevant, service exit or our leaving a service processes

Outcomes:

* All Guide Dogs SA/NT premises meet Commonwealth and State access standards.
* Improved overall client satisfaction rating.
* Services which effectively support client access are sustainable within current funding models

|  |  |  |  |
| --- | --- | --- | --- |
| Action | | Responsibility | Timeline |
| 8.1.1 | Ensure all Guide Dogs SA/NT facilities meet all relevant Commonwealth and State disability access standards | Chief Operating Officer  ICT & Facilities Supervisor | Reviewed Annually Q1 |
| 8.1.2 | Ensure any other facilities engaged to deliver Guide Dogs SA/NT services meet disability access standards | Chief Operating Officer  ICT & Facilities Supervisor | Reviewed Annually Q1 |
| 8.1.3 | Conduct an annual physical access audit for all Guide dogs SA/NT facilities. Risk assess and prioritise each recommendation, include in (DAIP) and action accordingly | Chief Operating Officer  ICT & Facilities Supervisor | Reviewed Annually Q1 |
| 8.1.4 | Evaluate the effectiveness and efficiency of service delivery models currently operating in NT, to ensure access practices meet the wide-ranging needs of NT clients | Business Operations Manager | Reviewed Annually Q4 |
| 8.1.5 | Include specific questions on program/service access in all client satisfaction surveys | Business Operations Manager  Team Leader, Client Support | June 2021 |

## 8.2 Accessible Information and Communication about Services and Programs.

Guide Dogs SA/NT is committed to ensuring all our information and communication are as accessible as possible (e.g. in terms of availability, style and format) to all people, including those with disabilities. Our communications activities are directed at a number of different audiences including clients, potential clients, carers/guardians, potential referral sources, staff, volunteers, donors, Association members, government bodies and community groups.

Outcomes:

* Guide Dogs SA/NT public information is available in various formats to cater for the needs of people with a vision impairment, and is in plain English as well as in a range of languages and Auslan.

| Action | | Responsibility | Timeline |
| --- | --- | --- | --- |
| 8.2.1 | Place a hearing loop sign on the front door as well as in front reception to indicate that Guide Dogs SA/NT supports the deaf or hearing impaired community who are able to access a hearing loop | Chief Operating Officer  ICT & Facilities Supervisor | June 2021 |
| 8.2.2 | Ensure visual information displayed on the LCD screen TV in front reception includes captions regarding the content presented and information regarding the availability of a hearing loop | Chief Operating Officer  ICT & Facilities Supervisor | January 2022 |
| 8.2.3 | Ensure that our induction includes training for all staff who have direct contact with clients who are deafblind in order to be able to communicate adequately, including the use of basic Auslan skills | Business Operations Manager | January 2022 |
| 8.2.4 | Ensure the continued distribution of Guide Dogs SA/NT information in a variety of outlets including media, publications, direct mail, conferences and events, and a variety of formats, including audio, large print and braille. | Manager, Marketing and Communications | Reviewed Quarterly |
| 8.2.5 | Ensure clients receive a summary of agreements at commencement and closure of services in their preferred format and language | Business Operations Manager  Team Leader, Client Support | Reviewed Quarterly |
| 8.2.6 | Ensure prompts are included on all referral forms, initial assessment forms and review forms, for staff to record the preferred format in all communication and correspondence from Guide Dogs SA/NT | Business Operations Manager  Team Leader, Client Support | June 2021 |
| 8.2.7 | Ensure all client-specific communication and correspondence between Guide Dogs SA/NT and clients is in their preferred format | Business Operations Manager  Team Leader, Client Support | June 2022 |
| 8.2.8 | Include a standard line on every relevant official Guide Dogs SA/NT publication to advise the reader the material is available in alternative formats (or can be provided upon request). | Manager, Marketing and Communications | June 2022 |
| 8.2.9 | Develop a clear procedure for all staff on how to arrange print to alternative formats, including large print, braille, screen-reader software compatibility and MP3. | Business Operations Manager  Team Leader, Client Support | June 2022 |
| 8.2.10 | Ensure that our induction includes appropriate client-facing staff in the role and operation of communication aids to ensure effective interaction with clients. | Business Operations Manager  Team Leader, Client Support | January 2022 |
| 8.2.11 | Ensure the Guide Dogs SA/NT website meets and remains up to date with international access standards – i.e. meets the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG2.0). | Manager, Marketing and Communications | June 2021 |
| 8.2.12 | Ensure the current DAIP is accessible through the Guide Dogs SA/NT website and available in alternative formats such as large print, Braille and audio upon request. | Manager, Marketing and Communications | June 2021 |

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## 8.3 Responsive Organisational Culture

Guide Dogs SA/NT does not define our clients by their disability. In tailoring service delivery to support the functional impact of a client’s disability and to meet their unique goals, we take into consideration all aspects of the individual, including but not limited to their cultural and language background, religious beliefs and sexual orientation. We achieve this by the provision of appropriate staff training and building relationships with relevant service providers.

Outcomes:

* Any staff training provided on cultural and social diversity, for example Aboriginal & Torres Strait Islander people, CALD and LGBTQI, will incorporate consideration of what this means for people in this cohort with disability
* Staff can deliver holistic services which are appropriate to the client’s disability and culture and gender.

| Action | | Responsibility | Timeline |
| --- | --- | --- | --- |
| 8.3.1 | Provide disability awareness training relevant to positions of staff and volunteers, including Board members, and incorporate this training into induction programs. | Chief People & Culture Officer, | January 2022 |
| 8.3.2 | Ensure staff providing direct services to clients with disability have appropriate training to ensure that service delivery is responsive to the client’s unique circumstances. This includes but is not restricted to clients who are CALD, Aboriginal & Torres Strait Islander peoples and/or LGBTQI. | Business Operations Manager  Chief People & Culture Officer, Human Resources | June 2021 |
| 8.3.3 | Develop and maintain relationships with CALD, Aboriginal & Torres Strait Islander peoples and LGBTQI organisations in order to inform training programs and service delivery models to clients with disability from these | Business Development Consultant | Reviewed Quarterly |

## 8.4 Client Participation

Guide Dogs SA/NT has a strong focus on client participation. Guide Dogs SA/NT is committed to involving clients and their chosen advocates or carers in a range of policy development, service enhancement and review processes conducted within the organisation. Client consultation is a priority and acts as a precursor to the endorsement of relevant policies, procedures or service changes that are endorsed by the Board of Management.

Outcomes:

* Clients are consulted and/or involved in the development of policies, procedures, service enhancement and review activities that impact on the services they receive.
* Clients are aware they are welcome to provide suggestions/feedback to staff and management regarding any matters pertaining to the organisation’s operation at any time, and this can be done in their preferred language and formats.
* Guide Dogs SA/NT affirms the client assertion “Guide Dogs do it with us and not for us.”

| Action | | Responsibility | Timeline |
| --- | --- | --- | --- |
| 8.4.1 | Ensure systematic client suggestions and feedback mechanisms for all client service related activities, in addition to existing complaints procedures, are in place. | Business Operations Manager  Quality Systems Coordinator | Reviewed Quarterly |
| 8.4.2 | Continue to conduct client satisfaction surveys on a regular basis | Business Operations Manager | Reviewed Quarterly |

## 8.5 Accessible Workplace Practices

Guide Dogs SA/NT is committed to providing all employees, potential employees and volunteers with fair access to employment-related opportunities. Decisions regarding recruitment, promotion, transfers, training and development must be based on merit, with consideration of skills, qualifications, competence and potential, irrespective of disability.

Guide Dogs SA/NT is committed to meeting our responsibilities under guiding legislation, including the Disability Discrimination Act (1992) and the Equal Opportunity Act (1984). We integrate the principles of this legislation into our policies and procedures to embed good practice across the organisation.

The management of Guide Dogs SA/NT has a firm commitment to fair treatment principles, and will ensure that no discriminatory policies, practices or procedures exist in any aspect of employment and service delivery.

Guide Dogs SA/NT is also committed to affirmative action strategies, and as such will encourage the recruitment of a candidate with a disability if they have the capability to fulfil the requirements of the role. Preference will be given to candidates with a disability if they are equally suitable for the position.

Outcomes:

* During induction all staff are made aware of and understand the relevant acts
* Processes are in place to help eliminate discriminatory practices.

| Action | | Responsibility | Timeline |
| --- | --- | --- | --- |
| 8.5.1 | Seek assistance and advice from specialist disability employment agencies to:  enhance understanding of capabilities and support needs of people with disability in a work environment  understand the respective responsibilities of the organisation and staff member to ensure he/she is fulfilling the requirements of the job  ensure performance support processes are utilised appropriately to achieve optimal outcomes for the staff member and the organisation. | Chief People & Culture Officer, Human Resources | December 2021 |
| 8.5.2 | Incorporate in the development of Guide Dogs Access & Equity Policy (see 8.6.5) the requirement to address the needs of staff with disability in the planning and delivery of staff training, workshops and meetings | Chief People & Culture Officer, Human Resources | December 2021 |
| 8.5.3 | Include a clause in Guide Dogs SA/NT’s Access and Equity policy (see 8.6.5) requiring the adoption of work practices and information technology systems that are ‘disability friendly’, while also meeting efficiency and cost- effectiveness criteria, | Chief People & Culture Officer, Human Resources | December 2021 |

## 8.6 Meeting the Requirements of the Disability Discrimination Act (1992)

Guide Dogs SA/NT recognises that under the DDA, a Disability Action & Inclusion Plan must include certain provisions (see Appendix 1). A key objective of this Plan is to facilitate the meeting of these requirements.

Outcomes:

* All staff are aware of and understand the DAIP
* Outcomes of, and management commitment to, the DAIP are visible to staff
* The DAIP is monitored and reviewed on an ongoing basis
* The DAIP is evaluated and revised as required

| Action | | Responsibility | Timeline |
| --- | --- | --- | --- |
| 8.6.1 | Register Guide Dogs SA/NT DAIP with Australian Human Rights Commission | Chief Operating Officer | June 2021 |
| 8.6.2 | Publicise and distribute the DAIP via I-Sight and on the website, and ensure currency of the publicised document. | Business Operations Manager  Manager, Marketing and Communications | June 2021 |
| 8.6.3 | Incorporate DAIP training as part of disability awareness training. | Chief People & Culture Officer, Human Resources | January 2022 |
| 8.6.4 | Incorporate DAIP implementation as part of key responsibilities in position descriptions of relevant positions of the organisation | Chief People & Culture Officer, Human Resources | June 2021 |
| 8.6.5 | Develop a Guide Dogs SA/NT policy on disability access, to incorporate disability access needs of both staff, clients and visitors. | Chief People & Culture Officer, Human Resources  Chief Operating Officer | June 2021 |
| 8.6.6 | Responsible Senior Managers to actively monitor DAIP implementation and provide progress reports to the Executive and Service Delivery Committee and Board. | Business Operations Manager  Chief Operating Officer | Reviewed Quarterly via SLT Meetings |
| 8.6.7 | Evaluate the success of the DAIP in achieving performance indicators. Revise DAIP and implement changes as required. | Business Operations Manager  Chief Operating Officer | Reviewed Quarterly via SLT Meetings |

# 9.0 Performance Indicators

The following performance indicators will be monitored to assist in measuring the effectiveness of the DAIP in meeting its objectives.

| Performance Indicator | | Target | Responsibility | Timeline |
| --- | --- | --- | --- | --- |
| 9.1 | Client satisfaction rating on specific issues pertaining to access including accessibility to Guide Dogs SA/NT’s information and communication | Baseline satisfaction rating averages of more than 75%, with a view to increasing | Business Operations Manager | Reviewed Annually in end of Q2 |
| 9.2 | Client complaints regarding accessibility of Guide Dogs SA/NT’s programs and services | Less than 5% | Business Operations Manager | Reviewed Annually in end of Q2 |
| 9.3 | Client complaints regarding the lack of disability awareness and lack of disability awareness of staff | Nil | Business Operations Manager | Reviewed Annually in end of Q2 |
| 9.4 | Client participation | Hold 4 Consumer Reference Committee meetings per year with at least 3 outcomes of the committee’s recommendations in organisational initiatives per year | Business Operations Manager  Chief Operating Officer | Reviewed Annually in end of Q2 |

# 10.0 Grievances and Queries

Grievances and queries about the accessibility of Guide Dogs SA/NT services should be directed to:

Business Operations Manager 251 Morphett Street

ADELAIDE SA 5000

Tel. 8203 8333

TTY. 8203 8391

Fax. 8203 8332

Email: [info@guidedogs.org.au](mailto:info@guidedogs.org.au)

# 11.0 Appendix 1: Legislative Requiremsnt for Action Plans

The following information has been taken from a document entitled “Disability Discrimination Act Action Plans: A Guide for Non-Government Organisations” from the Australian Human Rights Commission website. This is included here as an important point of reference.

### Legislative Requirements for Action Plans

Section 61 of the Disability Discrimination Act (1992) states that the action plan of a service provider must include provisions relating to:

1. the devising of policies and programs to achieve the objects of this Act; and
2. the communication of these policies and programs to persons within the service provider; and
3. the review of practices within the service provider with a view to the identification of any
4. discriminatory practices; and
5. the setting of goals and targets, where these may reasonably be determined against which the success of the plan in achieving the objects of the Act may be assessed; and
6. the means, other than those referred to in paragraph (d), of evaluating the policies and programs referred to in paragraph (a); and
7. the appointment of persons within the service provider to implement the provisions referred to in paragraphs (a) to (e) (inclusive).

Section 62 of the Act states that the action plan of a service provider may include provisions, other than those referred to in section 61, that are not inconsistent with the objects of this Act.

# 

# 12.0 Appendix 2: Legislation, Standards and References

|  |  |
| --- | --- |
| Relevant Legislation | Commonwealth:  Disability Discrimination Act (1992)  Disability Services Act (1986)  Disability Services Act (1993) – SA  Disability Services ACT (2017) - NT  Equal Opportunity Act (SA) 1984  Fairwork Act (2009)  Sex Discrimination Act (1984) |
| Associated Policies and Procedures |  |
| References | DHS –Disability Access and Inclusion Plan 2020-2024  National Disability Strategy 2010-2020  State Disability Action and Inclusion Plan – Inclusive SA 2019-2023  Australian Human Rights Commission – Disability  Action Plans: A Guide for Business January 2015 |