Accessibility Action Plan 2024-26

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# Opening statement

Welcome to the Workplace Injury Commission’s Accessibility Action Plan (the Plan). Our Plan is ambitious and will guide our approach to inclusion and accessibility for our employees and clients.

Our work plays an important role in the lives of injured workers. To ensure all people, regardless of ability, have access to our services we must take intentional steps to be inclusive and accessible. We know that people with disability often face unique and daunting challenges. It is imperative that, when they engage with our services, they experience no barriers and that they feel they are in a safe, inclusive, and supportive space.

We are committed to providing a safe and inclusive workplace that enables people of all abilities to realise their full potential and meaningfully contribute to our shared vision. We will achieve this by raising our people’s awareness of disability, including invisible disability. We will also implement improvements to our work environments to ensure people of all abilities have equal access to information.

As our first Accessibility Action Plan, we acknowledge there is work to do to establish our foundations and build a clear understanding of our objectives. And I am confident that the actions we have outlined will guide us on this journey and support us to progress towards sustainable change.

As we continue to evolve as an organisation, we want our clients and employees to feel a genuine sense of belonging and empowerment regardless of ability. We look forward to making an important difference in the lives of individuals of all abilities.

**Alyssa Duffy**

Chief Executive Officer

# Acknowledgement of Country

The Workplace Injury Commission respectfully acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Owners of the land on which we live and work here in Victoria. We acknowledge Elders in their communities past and present.

As the custodians of our land for more than 60,000 years, we recognise we have a great deal to learn from Aboriginal and Torres Strait Islander peoples. We also recognise that, as a Victorian Government statutory authority, we have a responsibility to help address the wrongs of the past.

We are committed to engaging proactively with Aboriginal and Torres Strait Islander groups in Victoria to determine how best we can make a meaningful contribution towards advancing reconciliation and First Nations inclusion.

# A note on language

Language and imagery can include or exclude individuals and groups. We have used respectful and empowering language in this plan. We align with the strengths-based approach of the Victorian Government’s Inclusive Victoria: State Disability Plan 2022-2026. We use person-first language, such as ’person with disability’ to respect identities beyond disabilities and combat ableism.

We also acknowledge both lived and living experiences, understanding that impacts from past events may continue into the present. This awareness ensures we consider people’s ongoing safety and wellbeing. We have used the term accessibility rather than disability following feedback that accessibility takes a more strengths-based tone.

The term Aboriginal and Torres Strait Islander Peoples is used for First Nations People. Language evolves, and we respect people’s rights to use terms meaningful to them. We will continue to listen to those with lived and living experiences to shape our language and enhance inclusion and access for everyone involved.

# Inclusion, equity, and diversity

Our first Accessibility Action Plan is an important element of our Belonging: Our Diversity and Inclusion Framework. The Belonging Framework spells out our aspirations and plans to strengthen diversity, inclusion and belonging at the Workplace Injury Commission.

We take our lead from the Diversity Council of Australia who offers the following insight on inclusion:

‘Inclusion occurs when a diversity of people (e.g. of different ages, cultural backgrounds, genders) feel valued and respected, have access to opportunities and resources, and can contribute their perspectives and talents to improve their organisation.’

Access and accessibility are at the heart of inclusion and belonging. This piece of work is critical if we are to achieve our aspirations for the Belonging Framework.

With this connection in mind, the Accessibility Action Plan follows the same broad approach outlined in the Belonging Framework and operates across the first two horizons of the framework:

1. **Enhancing our Understanding –** We will be involved in education and awareness raising through workshops and development experiences. We will educate ourselves so that we are well placed to take action to enhance the accessibility of our services and workplace.
2. **Taking Action –** By connecting the lived experience of those across the focus areas to our workplace and business practices, we will make changes that reduce barriers to participation and effective outcomes. In some instances, change can be implemented quickly and effectively. In other circumstances we may need to reflect and learn more before committing to action.

The third horizon, Demonstrating Belonging, will be observed as part of the overarching Belonging Framework. The focus of this plan is learning and acting specifically related to people living with disability. What this will look like specifically is outlined in this Accessibility Action Plan.

## A note on invisible disability

Invisible disability deserves a call out because of its presence in our workplace and the challenges expressed about living and working with invisible disability. This plan pays particular attention to strengthening understanding and awareness of invisible disability.

# Our service snapshot

In Victoria, injured workers can claim compensation and receive support to recover and, if possible, return to work. If an injured worker does not agree with a compensation decision, they can dispute it.

The Workplace Injury Commission is a statutory authority that helps resolve workers compensation disputes. We do this by providing independent and impartial conciliation and arbitration services to injured workers and their employers. Our services provide efficient, informal, and affordable alternatives to court.

We understand that when a dispute occurs it can be a difficult, stressful time and reaching a resolution matters to everyone. Accessible and inclusive service plays a role in ensuring the often-distressing impact of disputes is not amplified.

The snapshot to the right shows what we achieved in 2023-2024 and just how well we did in the eyes of our clients and people.

# Disability snapshot

Below is a snapshot of disability in Australia. We will be working to build a stronger picture of disability in our workplace as part of this Plan.

# Snapshot of disability data for AustraliaThe context for accessibility action planning

‘Part of the problem is that we tend to think that equality is about treating everyone the same, when it’s not. It’s about fairness. It’s about equity of access.’

- Judith Heumann | Disability Rights Activist.

## Legislative context

This plan is both an important element of our progress on inclusion and belonging and a product of the federal and state legislative contexts.

In Victoria the Disability Act 2006 ‘...requires public authorities, state government departments and local governments to prepare disability action plans. These plans need to describe how the agency will address access and inclusion barriers for people with disability, as both service users and employees.’

We have approached action planning following the guidance outlined by the Victorian Government and through learning from those organisations who are well progressed in this space. The recommended approach emphasises accessibility, inclusion, and empowerment of individuals with disabilities and is guided by the principles outlined in the Disability Act 2006.

The approach guides organisations to:

* Conduct assessments to identify and eliminate barriers within their services, facilities, and communication methods. This includes ensuring physical accessibility of buildings, as well as providing information in accessible formats including digital formats.
* Foster a culture of inclusion by providing disability awareness and sensitivity training for employees. This helps employees understand the diverse needs of people with disabilities and promotes respectful, inclusive, and supportive interactions.
* Actively engage with people with disabilities to gather insights and feedback. This engagement ensures that the perspectives of individuals with lived experiences are integrated into the planning and implementation processes.

To measure progress and ensure accountability, entities set specific, measurable goals and regularly report on their achievements. These reports are made public to maintain transparency and demonstrate the commitment to continuous improvement.

Beyond state legislation, the Commonwealth Disability Discrimination Act 1992 aims to reduce discrimination against people with disabilities in various areas, like employment, housing, education, and access to services. It ensures that people with disabilities have equal rights under the law as others in the community and requires organisations and businesses to work in line with this intent.

## Organisational context

Given the nature of our work, we have an opportunity to lead by example by providing accessible and inclusive services to all our clients. Similarly, it is important that we create an accessible and inclusive workplace. By ensuring an equitable, accessible and inclusive work experience to all people, including those living with disability, we can demonstrate that disability is no barrier to a full and rich career and participation in workplace life.

A robust Accessibility Action Plan is critical if we are to deliver on our strategic objectives, in particular:

* **Experience –** improving the service experience of injured workers and stakeholders. Accessibility will ensure all parties have access to services regardless of ability / disability.
* **People –** fostering a highly motivated, capable, diverse and engaged workforce. Ensuring people with disability can fully participate in the workplace will boost diversity and tap into our strengths of care and integrity.

## The challenge and opportunity of our world today

Our workplace, like so many across Victoria, has undergone substantial transformation following the emergence of COVID-19 and subsequent disruptions to everyday life and workplace norms. These disruptions have relevance to issues of, and opportunities for, accessibility. Key changes include the rapid adoption of virtual work, significant mental health impacts, physical health disruptions, and shifts in work-life balance dynamics.

For clients and stakeholders, progress made during periods of virtual work offers enhanced access to our services. The shift to online services and virtual interactions (such as virtual conciliation conferencing) presents accessibility opportunities for clients with disabilities. We will continue to build on the lessons learnt to strengthen our digital interfaces and offer high-quality virtual services so that all parties have equitable access to our service.

For employees there are a few key issues and opportunities we have considered in the creation of this Accessibility Action Plan.

* **Flexible work arrangements:** Our hybrid and virtual work offering provides flexibility, reduces commuting challenges, and offers an adaptable work environment for employees living with disability. In a competitive market for talent, our ongoing commitment to hybrid and flexible working is also an advantage.
* **Mental health support and psychological safety:** Mental health disability is often unrecognised because of its invisible nature. The pandemic has seen an increase in mental health issues which need to be accounted for in the work environment. In the formulation of this plan, we have prioritised the evolution of behavioural and structural inclusion (leadership capability, employee awareness, environmental factors) to address the specific needs of employees living with disabilities, particularly those living with invisible disability. The ongoing focus on creating a psychologically safe work environment is also a key element of this plan.
* **Inclusive technology:** The reliance on digital tools for virtual work highlights the importance of accessible technology. We will continue to ensure that digital platforms and communication tools are accessible to employees with disabilities, fostering an inclusive virtual work environment.

COVID-19 has transformed the workplace in ways that present both challenges and opportunities for enhancing accessibility. By prioritising flexible/hybrid work arrangements, mental health and wellbeing, and inclusive technology, we can continue to strengthen an accessible and supportive environment for employees living with disability or/and caring for others who live with disability.

## Intersectionality and disability

Intersectional disadvantage refers to the overlapping and interdependent systems of discrimination or disadvantage that individuals may experience due to multiple aspects of their identity. In the context of disability, this concept highlights how people with disabilities often face compounded barriers when other factors such as race, gender, socioeconomic status, and sexual orientation intersect with their disability.

For example, a transgender woman with disabilities may encounter both gender-based and disability-related discrimination, limiting equitable access to employment, education, and healthcare. Similarly, Aboriginal and Torres Strait Islander people with disabilities may experience heightened prejudice, cultural incompetence and reduced opportunities which may exacerbate the inequity already experienced as a person living with disability.

Intersectionality underscores the importance of recognising and addressing these multifaceted layers of disadvantage to create inclusive and equitable environments. By acknowledging the diverse experiences of people with disabilities and implementing a whole of person approach, we will better support the unique needs and rights of all individuals, ensuring fairer access to our services and workplace opportunities.

# How we developed our plan

This plan has been developed in consultation with employees, particularly those with lived or living experience of disability or those who care for people with disability. An inclusion and diversity specialist was engaged to support the project. The process is described below.



# Focus areas

We are fortunate that there is an authentic culture of care and a values-led commitment to inclusion across the organisation. Coupled with our physical environment which has recently undergone a refurbishment and has accessibility at the core of its design, we are well placed to create meaningful change.

In line with our Belonging Framework, this two-year plan is focused on first enhancing our understanding and second taking action. It is split across three main areas:

* Establishing and sustaining the plan
* Our clients and stakeholders
* Our people

These focus areas are described at a high level below and then a detailed action plan with time frames, accountability and draft measures is laid out in the pages that follow.

## Establishing and sustaining the plan

This aspect of the plan ensures that we have:

* clarity of plan ownership and alignment with the Belonging Framework
* commitment to communicate and engage regularly
* accountability to track and measure
* alignment with our Gender Equality Action Plan.

## Our clients and stakeholders

Our aspiration to continue to strengthen an accessible service experience sits at the heart of this plan.

### Enhancing our understanding

To continue to strengthen the service experience we offer clients and others, an understanding of our client demographics and accessibility and inclusion needs will be valuable. This plan commits us to building a disability picture of our client base by gathering data that will help us understand accessibility needs.

### Taking action

We are committed to digital and physical accessibility and to ensuring our program of work considers accessibility. This program includes two critical and aligned projects: the Service Model and the implementation of a new Case Management System (CMS). To do this we will ensure disability and accessibility are part of the intersectional considerations of the Gender Impact Assessment process.

## Our people

Our people are at the heart of our Belonging Framework and our aspirations to be an exemplar of accessibility and disability inclusion in the workplace.

### Enhancing our understanding

The review and interviews conducted in the preparation of this plan identified a number of opportunities for us to enhance our understanding of disability and accessibility. These include:

* Consolidating our data on disability.
* Reviewing core people policy and process documentation for accessibility considerations.
* Offering our leaders and employees opportunities to increase their understanding of access, equity and inclusion and develop their own disability confidence, particularly when leading diverse teams in a flexible / hybrid work environment.

### Taking action

This section of the plan is focused on:

* Ensuring barriers to participation in work across the talent management cycle are identified and removed.
* Further strengthening disability confidence with a specific focus on communication, learning and the capability of leaders and team members.

# Our Accessibility Action Plan in detail

## Establishing and sustaining the plan

|  |  |  |  |
| --- | --- | --- | --- |
| **Action** | **Timeframe** | **Accountable** | **Measure** |
| Establish project working group within or as part of Belonging Working Group. | FY25 Q1 | People and Culture | Group established and meeting cadence documented. |
| **Regularly report and communicate progress of this plan**   * Specific format and forums to be agreed as part of this action. May include forums such as TGC. * Ensure streamlining with other P&C reporting to avoid duplication etc.   This may be as part of Belonging Framework reporting. | Ongoing | People and Culture | Quarterly communications shared with all employees and leadership. Board reporting as required. |
| **Signing off on the Plan**  Develop and sign off measures for all actions in this plan. | FY25 Q1 | People and Culture | Measures in this table completed and signed off. |
| **Gender Impact Assessment (GIA) Process**   * Ensure GIA process is truly intersectional including all abilities access considerations (Move from GIA to GIA+) * Mirror relevant actions in Gender Equality Action Plan (GEAP) and broaden them out to an intersectional, belonging lens (which includes all abilities access) | FY25 Q3 | People and Culture | GIA Process shows clear consideration of all abilities access and other intersectional considerations, for example, race or age. |

## Our clients and stakeholders

**Enhancing our understanding**

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| --- | --- | --- | --- |
| **Action** | **Timeframe** | **Accountable** | **Measure** |
| **Build understanding: gather data**  Disability data – WIC clients | FY26 Q1 | People and Culture | We can share a clear picture of disability demographics of people who access our services. |
| **Service Model Accessibility**  Ensure the Service Model project has accessibility considerations documented and taken into account as part of the user experience | FY25 Q2 | People and Culture  Strategy and Experience | Service Model demonstrates accessibility considerations in final design. |
| **Case Management System**  Ensure the Case Management System project team are considering accessibility of the system for people with disability | FY25 Q2 | People and Culture  Strategy and Experience | Case Management System demonstrates accessibility considerations in final design. |

**Take action**

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| --- | --- | --- | --- |
| **Action** | **Timeframe** | **Accountable** | **Measure** |
| **Digital accessibility**  Ensure digital content published on WIC’s channels meets the Web Content Accessibility Guidelines (WCAG) 2.1 AA standards. | FY25 Q2 | People and Culture  Communications | Digital content is compliant. |

## Our people

**Enhancing our understanding**

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| --- | --- | --- | --- |
| **Action** | **Timeframe** | **Accountable** | **Measure** |
| **Gather data**  Disability data – WIC employees  Publish data when known as part of Annual Report and ensure achievements are visible on our website. | FY26 Q1 | People and Culture  Communications | We can share a clear picture of disability demographics of our employee base. |
| **Policy and process review**  Review key employment policies and processes and identify any enhancements to ensure accessibility for all. | FY25 Q4 | People and Culture  Policy | Policies requiring updates have been identified (FY25 Q4) and scheduled for revision (FY26 Q4). |
| **Connection to organisational leadership and culture**  Identify key points of intersection with emerging leadership and culture program of work to ensure inclusion and accessibility are woven into that work and reinforced by it. | Ongoing | People and Culture | Evidence of inclusion and accessibility in both the content of, and approach to, the delivery of culture and leadership initiatives. |
| **Inclusive foundations workshops**  Working inclusively with clients and colleagues:   * Creating inclusive spaces for connection, communication and learning (physical, virtual) * Inclusive language * Invisible disability * Other considerations for inclusion * Leading inclusion (leadership sessions) | FY25 Q4 | People and Culture | 90% of WIC leaders and employees have attended Inclusive Foundations. |
| **Leadership briefing**  Ensure leadership understand compliance requirements of leading people with disability. | FY25 Q4 | People and Culture | All WIC leaders sign off complete. |

**Take action**

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| --- | --- | --- | --- |
| **Action** | **Timeframe** | **Accountable** | **Measure** |
| **Accessible attraction and retention to build diversity**  Approach to talent management (attraction, onboarding, development, employee retention) | FY26 Q2 | People and Culture | Policy and process associated with all talent management at WIC demonstrate measures to enhance inclusion and accessibility measures. |
| **Accessible workplace – How we communicate and learn**   * Ensure all employees can utilise readily available tools (technology, software such as Microsoft accessibility checks) to produce inclusive communications, presentations and learning materials. * Continue to ensure all new starters complete health declaration and flag any reasonable adjustments required. * Continue to ensure home workplace assessments are completed where necessary. | FY25 Q4 | People and Culture | A checklist is available to support any employee to produce accessible digital content and presentations. |

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| --- | --- | --- | --- |
| **Strengthening trust and psychological safety**  Design and deliver interventions designed to strengthen trust and psychological safety at WIC. Options might include:   * Inclusive Leadership Development * Employee and Leader Connect Forums * Specific Spotlight Development: Collaboration in Action * Specific Spotlight Development: Accountability for Trust * Specific Spotlight Development: Strengthening Psychological Safety * Specific Spotlight Development: Know Your Impact | FY26 Q4 | People and Culture | Belonging Action Group have chosen the areas of focus by FY25 Q4 and then delivered by FY26 Q4. |