



HEALTH AND COMMUNITY SERVICES
COMPLAINTS COMMISSIONER

**Draft Disability Action and Inclusion Plan
2020 – 2024**

From the Commissioner

I am pleased to deliver the first Disability Access and Inclusion Plan (2020-2024) for the Office of the Health and Community Services Complaints Commissioner (HCSCC).

We know that one in five South Australian's live with disability and on a national level, Australians living with disability have reduced health status and health outcomes compared with Australians without disability.

As a small statutory office of 11 staff, we are committed to delivering an accessible, inclusive complaint resolution service for consumers of health and community services.

The Disability Action and Inclusion Plan captures this vision and allows the HCSCC to extend our commitment to best practice by ensuring we are also an employer of choice for people with disability.



A stylized, handwritten signature in black ink, consisting of a large loop and a trailing line.

Associate Professor Grant Davies

Health and Community Services Complaints Commissioner

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Contact Details

The Health and Community Services Complaints Commissioner's (HCSCC) Disability Access and Inclusion Plan (DAIP) is available in large font on the HCSCC website at www.hcsc.sa.gov.au. Our final DAIP will also be available on the website in easy read format. If you need a copy in a different format, please telephone us on (08) 8226 8666 or email us at: info@hcsc.sa.gov.au.

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About the HCSCC

The Office of the Health and Community Services Complaints Commissioner (HCSCC) is an independent, statutory office established by the *Health and Community Services Complaints Act 2004 (SA)* (the Act). The HCSCC:

- Receives, assesses and resolves complaints about health and community services in South Australia. We achieve this through mediation, conciliation and investigation.
- Improves the safety and quality of health and community services in South Australia.
- Identifies, investigates and reports on systemic issues of concern in health and community services.
- Promotes good complaint handling.
- Monitors trends in health and community services complaints and recommends improvements.
- Provides information, education and advice about:
 - health and community service rights and responsibilities
 - the HCSCC Charter of Health and Community Services Rights
 - complaints and good complaint handling.
- Provides assistance to service providers with complaints.

The HCSCC has a statutory relationship with the national health practitioner registration boards through the Australian Health Practitioner Regulation Agency (AHPRA).

The HCSCC also maintains links with diverse health and community service providers and organisations representing the interests of consumers and carers, including people with disability and other 'special needs' groups defined by the Act.

Staff profile

The HCSCC currently has 11 staff and two identify as living with disability. The HCSCC is committed to reducing the barriers for people with disability to full participation in the workforce. We are an equal opportunity employer and take a zero tolerance approach to any form of discrimination.

We support and understand the importance of the South Australian Public Sector Disability Employment Strategy and Plan in providing a framework the South Australian public sector to welcome, respect and value the expertise of employees with disability. This strategy can be accessed on the internet at: <https://www.publicsector.sa.gov.au/Resources-and-Publications/frameworks-and-toolkits>

Strategic Context

The HCSCC's strategic vision is for improved quality, safety and confidence in South Australia's health and community services through excellence in complaints resolution and education.

In achieving and delivering excellence in complaints resolution and education, the HCSCC is committed to the delivery of safe and quality health and community services for South Australians with disability, in line with the *Disability Inclusion Act 2018 (SA)*, *Inclusive SA: State Disability Inclusion Plan 2019-2023*, *the National Disability Strategy 2010-2020* and the United Nations Convention on the Rights of Persons with Disabilities.

A full copy of the HCSCC's strategic plan is available at:
<https://www.hcsc.sa.gov.au/about/hcsc-2019-2023-strategic-direction-2/>

Definition of Disability

The HCSCC refers to the definition of disability in relation to a person provided by the *Disability Inclusion Act 2018 (SA)* which includes 'long-term physical, psycho-social, intellectual, cognitive, neurological or sensory impairment, or combination of any of these impairments, which in interaction with various barriers may hinder the person's full and effective participation in society on an equal basis with others'.

The HCSCC also recognises the social model of disability as a conceptual model developed by people with disability recognising the impact of societal and structural barriers to full access and participation.

Actions

The Health and Community Services Complaints Commissioner’s Disability Access and Inclusion Plan is structured around the themes and priority areas of the Inclusive SA: State Disability Inclusion Plan 2019–2023.

1: Inclusive communities for all

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.

Priority 1: Involvement in the community | Priority 2: Improving community understanding and awareness | Priority 3: Promoting the rights of people living with disability

Action	State Plan Priority #	Responsibility	Timeframe	Measurable Target
1: The HCSCC continues to promote the rights of people living with disability in accessing and receiving health and community services, including people who reside in regional and remote areas beyond metropolitan Adelaide.	2,3	Commissioner & HCSCC Management team	Year 1	Monitor the implementation of recommendations from the HCSCC’s own motion investigation into treatment of people with disability within SA Health acute care settings.
		HCSCC Management team	Ongoing	Identify and track complainant and systemic trends relating to consumers with disability, especially within the HCSCC Assessment Service.
		All HCSCC Staff	Ongoing	Ensure HCSCC presentations and complaint management consultancy materials contain explicit reference to the rights and needs of people with disability in health and community services settings.
2: The HCSCC’s presence is accessible according to principles of universal design.	1,2	Senior Media and Communications Advisor	Ongoing	HCSCC stalls at community events are accessible according to the principles of universal design. HCSCC marketing collateral considers the needs of and is accessible to people with disability.

<p>3: HCSCC staff are provided with opportunities to engage with and understand the lived experience of people with disability in accessing health and community services, including training about the Social Model of Disability.</p>	<p>1,3</p>	<p>HCSCC Management Team</p>	<p>Year 1</p>	<p>HCSCC staff engage in specialist training by December 2021. New staff complete training within 6 months of commencement.</p>
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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.

Priority 4: Participation in decision-making | Priority 5: Leadership and raising profile | Priority 6: Engagement and consultation

Action	State Plan Priority #	Responsibility	Timeframe	Measurable Target
1: the HCSCC develops and implements an internal policy relating to inclusion and equity across our Assessment and Complaint Resolution Services, facilitating clear guidance about reasonable adjustment in service provision as well as meaningful engagement and inclusive decision making across the life of a complaint.	4,6	HCSCC Management team	Year 1	A review is conducted of existing and historical formal and informal approaches to inclusion and equity, including the identification of any pre-existing resources by the end of 2021.
			Ongoing	Development of the policy will include consultation with people with disability and other key stakeholder groups such as carers and advocates. Consultation will also include recognition of intersectionality and seek input from Aboriginal and Torres Strait Islander people with disability, as well as those from CALD and LGBTIQ communities.
			Year 1	Development of the policy will ensure compliance and parity with the United Nations Convention on the Rights of Persons with Disability and Optional Protocol, as well as the SA Health Equity of Access to Health Care Policy Directive. Development and implementation of guidelines to be used by all HCSCC staff in delivering complaint resolution services by end 2021. This includes guidance for staff on engaging with Consumers who may use assistive communication technology.

<p>2: The HCSCC establishes relationships with and explores referral pathways to Disability Advocacy Services to ensure complainants receive safe and timely supports to engage in the complaint resolution process where it becomes clear a person with disability requires additional support to engage with the HCSCC.</p>	4,5	HCSCC Management Team	Year 1	The HCSCC engages in meetings with local advocacy services, identifying appropriate referral pathways, by end 2021.
			Ongoing	HCSCC staff receive training and support to identify when a complainant may need support from an advocacy service, and to discuss and support referral with the complainant as appropriate.
<p>3: The HCSCC ensures opportunities for people with disability in all consumer consultation and engagement, including in any future advisory groups. The HCSCC commits to utilising the principles of co-design and community engagement process in all future consultation.</p>	4,6	HCSCC Management Team	Ongoing	The HCSCC develops a mechanism for inclusive engagement and consultation with the disability community and ensures opportunity for people with disability to contribute to any future consultative activities.
			Ongoing	The HCSCC produces a guideline or process for the use of co-design principles in consultation.

<p>4:The HCSCC ensures opportunities for professional development and pathways into leadership exist for staff with disability who wish to pursue advancement.</p>	<p>5</p>	<p>HCSCC Management Team</p>	<p>Ongoing</p>	<p>Staff with disability are actively encouraged to consider professional development and are provided with parity of access to leadership pathways, including opportunities to ‘act up’ and external training and development as appropriate.</p>
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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. **Priority 7: Universal Design across South Australia | Priority 8: Accessible and available information | Priority 9: Access to services**

Action	State Plan Priority #	Responsibility	Timeframe	Measurable Target
<p>1: The HCSCC workplace and facilities is accessible according to the principles of universal design, with particular attention paid to physical, social and cultural accessibility and inclusion.</p>	7, 9	HCSCC Management team	Year 1	An accessibility audit of the upcoming workplace and facilities is conducted, including entry and exit, signs and opportunities to make use of tools such as wayfinding.
			Ongoing	An emergency evacuation plan utilising best practice in inclusion and accessibility is developed for staff and visitors to the site with disability.
			Ongoing	Any new premises considered for the HCSCC should be structured and planned to remove barriers for people with disability, and where possible proposed layouts should be assessed for compliance by an external accredited access consultant.
			Ongoing	All HCSCC staff to be trained in the principles of universal design, with special attention paid to physical, social and cultural inclusion.

<p>2: HCSCC websites, complaint forms, promotional materials, fact sheets and other collateral are accessible, or have accessible alternatives according to the principles of universal design.</p>	<p>7,8,9</p>	<p>Senior Media and Communications Advisor</p>	<p>Ongoing</p>	<p>HCSCC Materials are reviewed for accessibility against universal design principles and alternatives developed where necessary. Future materials are designed from outset to be accessible according to the principles of universal design.</p>
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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.

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

Action	State Plan Priority #	Responsibility	Timeframe	Measurable Target
<p>1: The HCSCC promotes a diverse, inclusive workforce and is an employer of choice for people living with disability.</p>	<p>11, 12</p>	<p>HCSCC Management team</p>	<p>Ongoing</p>	<p>HCSCC vacancies and recruitment processes are managed and conducted to maximise accessibility and inclusion. Panel members are provided professional development in accessible selection processes and reasonable adjustment.</p>
			<p>Ongoing</p>	<p>The HCSCC Management and Administrative teams are provided with professional development required for supporting inclusive workplaces and diverse employees, such as unconscious bias.</p>
				<p>The public sector Disability Recruitment Register is utilised to identify suitable candidates for short term or non-ongoing positions</p>

				<p>that do not require external processes.</p> <p>HCSCC Management ensure supervision and professional development opportunities for staff with disability are accessible and inclusive</p> <p>HCSCC Management to ensure reasonable adjustment requests and access to workplace modifications are actioned in a timely and inclusive manner, facilitating ease of process for employees with disability.</p>
<p>2: The HCSCC actively seeks to attract, recruit, support and retain people with disability.</p>	<p>12</p>	<p>HCSCC Management team</p>	<p>Ongoing</p>	<p>The HCSCC reviews current employment and HR processes to ensure accessibility for people with disability. This includes reviewing support provided to employees with disability and will take into consideration the importance of social and emotional environment in meeting the needs of employees with disability, as per universal design and best practice in disability recruitment processes.</p>
			<p>Ongoing</p>	<p>The HCSCC works with the Office of the Commissioner for Public Sector Employment (OCPSE) to support and implement the South Australian Public Sector Disability Employment Strategy, and actively utilises the frame OCPSE Disability Framework and Toolkit in recruitment processes.</p>
			<p>Ongoing</p>	<p>Vacancies are advertised in additional forums likely to be accessed by people with disability, such as through Disability Employment Services.</p>

Disability access and inclusion plan development

Consultation

The HCSCC sought feedback from the South Australian community including people with disability, peak bodies supporting and advocating for people with disability and other stakeholders.

We received a broad range of feedback from the community. We have reviewed this feedback and, where relevant and appropriate included it in our finalised DAIP.

The HCSCC encourages further feedback on our DAIP to inform future versions. This can be provided by telephoning us on (08) 8226 8666 or emailing: info@hcscc.sa.gov.au

Our DAIP will be published on our website by 31 October 2020 and a notification of publication will be provided to DHSDisabilityInclusion@sa.gov.au on the same day.

Implementation

The HCSCC Management Team will continue to monitor the implementation and review of our DAIP, ensuring it continues to inform and strengthen the work we do as a statutory complaints body. Part of this process will be including the voice and feedback of people living with disability, both on our staff team and external to our office.

Glossary and Definitions

TERM	WHAT WE MEAN
HCSCC	the Office of the Health and Community Services Complaints Commissioner.
DAIP	Disability Access and Inclusion Plan, to inform and strengthen the work we do.
OCPSE	Office of the Commissioner for Public Sector Employment
UNIVERSAL DESIGN	Creating environments, services, physical locations, products and communities that can be used, enjoyed and participated in by as many people or people of all abilities to the fullest possible extent, without the need for further adaptations or adjustments.
ACCESS/ACCESSIBILITY	Can a person with disability meaningfully attend, engage with and/or use our location, resources, services and workplace environment.
INCLUSION/INCLUSIVE	Do our facilities, processes, services, resources, environment and culture support the inclusion and welcome of people with disabilities, in the same way as people without disabilities. Inclusion and inclusive environments also means people from other parts of the community including Aboriginal and Torres Strait Island People, LGBTIQ people, people from culturally and linguistically diverse backgrounds, young people and older people.