



Victorian  
Public Sector  
Commission



# Accessibility action plan (AAP)

Our AAP for the years 2024 to 2027 demonstrates our commitment across 5 focus areas to create inclusive and equitable access and opportunities for everyone.

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# Introduction

An opening message from the Commissioner and Deputy Commissioner.

## Message from the Commissioner and Deputy Commissioner

We are pleased to present the Victorian Public Sector Commission's (VPSC) Accessibility Action Plan 2024 to 2027.

We are committed to building a more inclusive Victoria that upholds the rights of people with a disability.

This plan drives our work to make the VPSC an employer that is genuinely accessible and inclusive, as part of a trusted and representative public sector workforce that delivers for all Victorians.

It sets our course to promoting universal access through five priority areas that reflect our organisation's size, structure, and resources, as well as how we will evaluate and report on progress over the coming years.

It continues, refines and builds on the excellent work of our previous Accessibility Action Plan 2019 to 2022.

We are proud of our achievements to date, including leading [Getting to work: the Victorian public sector disability employment action plan 2018 to 2025](#), improving our physical work environment, carrying out a Dignified Access Review, including disability awareness in employee inductions, ensuring accessible communications content and supporting flexible work arrangements. We are committed to continuing to make tangible, measurable improvements.

It's essential that the VPSC is a role model and walks the talk when it comes to accessibility, eliminating discrimination and attracting and retaining talented employees from all abilities and backgrounds to help us deliver the best advice, policies,



and programs. It's central to what we do and embedded in our public sector values particularly, Respect, Accountability, Leadership and Human Rights.

We're grateful to everyone who contributed to this plan. Working together is how we achieve positive change.

**Brigid Monagle**

Commissioner

Victorian Public Sector Commission

**Ella Mcpherson**

Deputy Commissioner and VPSC Disability Champion

Victorian Public Sector Commission



# Defining disability and understanding lived experience

Defining disability and understanding the lived and living experience of our workforce.

## Defining disability

The Victorian Public Sector Commission (VPSC) recognises the definition of disability as:

Persons with disabilities include those who have long-term (lasting 6 months or more) physical, mental health, intellectual, neurological, or sensory impairments which in interaction with various attitudinal and environmental barriers may hinder their full and effective participation in society on an equal basis with others.

This definition is based on descriptions recognised by the United Nations Convention on the Rights of People with Disability (UNCRPD) and Australian government. This 'Convention' defines disability within the context of the social model of disability, which recognises that negative attitudes and environmental barriers impact on people's ability to participate equitably in work and life. The Convention contains principles of human rights and capability building so that persons with disabilities have agency to contribute to social and public life.

The Victorian Government also acknowledges and values the social model of disability.

The VPSC Accessibility Action Plan is underpinned by this shared understanding of the social model of disability – to remove barriers to the workplace. This is consistent with the values we hold as a sector. We respect the human rights of people with disability.



## Understanding the lived and living experience of our workforce

Providing a workplace with dignified and universal access for our employees is a priority for us. We aim to ensure that every aspect of our physical and operational environment works together seamlessly to deliver an equitable experience for everyone.

VPSC is committed to being an employer that is genuinely accessible and inclusive. We want employees with lived or living experience of disability to fully engage in social and working life at the VPSC.

To provide everyone access to our physical work environment, we need to understand the experiences of people with disability. This includes people with permanent, temporary or situational sensory, cognitive or other conditions.

We provide ways for employees to raise concerns and suggest improvements to our policies, frameworks and systems. This includes those with accessibility criteria and insights from the People Matter Survey and other pulse survey results. All feedback and insights were used to inform the actions in this plan.

To ensure continuous improvement and accountability, the VPSC will regularly review its access and inclusion activities. We will address any barriers that impact our employee's ability to access the support they need in the workplace.

To demonstrate our commitment to access and inclusion, we'll:

- report on the implementation of our plan in our annual report
- publish our plan on our website
- lodge a copy of the plan with the Australian Human Rights Commission.



# Focus areas

The 5 focus areas within our Accessibility Action Plan and our commitments to creating an inclusive workplace environment that is accessible to everyone.

The focus areas within our Accessibility Action Plan are linked to the [guiding principles of the Commission](#).

## Focus area 1: Workplace accessibility

Inclusive practices for employment of people with disability will create a safe and accessible working culture.

### Priority

Increased diversity within VPSC's workforce.

### Action 1.1

Recruitment opportunities across the organisation ensure fair and equitable access to all roles at all levels.

### Success measure

Meet the Victorian Government's Getting to Work disability employment action plan target of 12 per cent disability employment by 2025 and beyond.

### Timeframe

Ongoing.

## Responsibility

Corporate and Digital Services to lead in consultation with all people leaders across the commission.

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### Action 1.2

Graduate positions offered at VPSC are prioritised for people with disability and or diverse backgrounds.

### Success measure

VPSC graduate positions are prioritised for people with disability or diverse background.

### Timeframe

Throughout the life of the plan.

## Responsibility

Corporate and Digital Services to lead in consultation with all people leaders across the commission.

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### Action 1.3

Internship opportunities at VPSC are targeted or prioritised for people with a disability and or diverse backgrounds.

### Success measure

VPSC internship positions are prioritised for people with disability or diverse





background.

## **Timeframe**

Throughout the life of the plan.

## **Responsibility**

Corporate and Digital Services to lead in consultation with all people leaders across the commission.

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## **Focus area 2: Communications and engagement**

Equitable access to information, knowledge and opportunity establishes a platform for positive interactions for people with disability.

## **Priority**

Accessible communications and engagement.

## **Action 2.1**

- Redesign and refresh the VPSC website to meet compliance with relevant accessibility standards and guidelines as per legislation.
- Conduct an accessibility audit following the website refresh to ensure compliance.
- Conduct an accessibility audit of other digital platforms managed by the Commission, including Innovation Network, Careers.Vic, and Jobs and Skills Exchange.
- Ensure VPSC e-learn modules (where available) are Web Content Accessibility Guidelines (WCAG) 2.2 compliant.



## Success measures

- VPSC website refreshed and compliant with accessibility standards.
- Accessibility audit of the new website completed.
- Identified accessibility issues are addressed and resolved.
- Accessibility audits for Innovation Network, Careers.Vic, and Jobs and Skills Exchange completed.
- All VPSC e-learning modules purchased or developed are evaluated and confirmed as WCAG 2.2 compliant.

## Timeframe

- Refresh: financial year 2025 to 2026.
- Audit: financial year 2026 to 2027.

## Responsibility

- Corporate and Digital Services.
  - Communications and Engagement.
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## Action 2.2

On the VPSC intranet, create an 'Accessibility Hub' to raise awareness of disability and chronic conditions, outline workplace accessibility features, communicate available support, and track progress of the Accessibility Action Plan.

## Success measure

'Accessibility Hub' created and communicated to staff.

## Timeframe

Financial year 2024 to 2025.

## Responsibility

- Corporate and Digital Services.
  - Communications and Engagement.
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## Focus area 3: Accessible processes and systems

Policies, frameworks, and systems that include accessibility criteria will enable inclusive and equal participation for people with disability.

## Priority

Inclusive workplace practices.

## Action 3.1

Review and update VPSC's social procurement framework and policy to ensure it is in line with the VPS framework.

## Success measures

- Accessibility and inclusion selection criteria are embedded in VPSC's procurement practices, with suppliers demonstrating compliance through social procurement reporting.
- VPSC engages suppliers who actively employ or support individuals with disabilities.
- ICT-related suppliers comply with the Australian ICT accessibility standard (AS EN

301 549:2020).

## Timeframe

Ongoing.

## Responsibility

Corporate and Digital Services.

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## Action 3.2

Review and update VPSC processes to ensure that people with disabilities receive all necessary and reasonable workplace adjustments at every stage of the employee lifecycle. This includes:

- implementing and monitoring workplace adjustments to ensure they are effectively supporting employees with disabilities.
- removing job requirements that may create barriers for people with disabilities in job descriptions.
- ensuring recruitment information is inclusive of people with disabilities.
- providing hiring managers and interview panel members with techniques and guidance to foster inclusive recruitment and interview practices.

## Success measures

- Employees with disability are encouraged to work with their P&C representatives to raise issues and suggest improvements in VPSC policies, frameworks and systems that include accessibility criteria.
- Employees with disability have access to support they need in their workplace and can engage fully in the social and working life at VPSC.
- All necessary workplace adjustments are provided and actioned, ensuring

employees with disabilities can fully participate in the workplace.

- Employees with disabilities report satisfaction with the workplace adjustments and feel empowered to fully engage in both work and social aspects of the VPSC.
- Staff with a disability indicate in PMS they do not experience discrimination and can access adjustments, reflecting a supportive and inclusive environment.

## Timeframe

Ongoing.

## Responsibility

Corporate and Digital Services.

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## Action 3.3

Provide the Executive Management Board (EMB) with regular reports on VPSC's diversity data, including data on employees with disabilities, gathered from People Matter Survey (PMS), pulse surveys, exit interviews, and other feedback mechanisms. The EMB will use this data to review and make adjustments to recruitment, retention, and workplace policies to improve inclusivity and the employee experience of people with disabilities.

## Success measures

- The EMB regularly reviews VPSC's diversity data, particularly regarding employees with disabilities.
- Informed adjustments are made to recruitment, retention, and policy practices to address any identified barriers and challenges.
- Improved reporting and understanding of the demographic profile and workplace experience of employees with disabilities at VPSC.

## Timeframe

Ongoing.

## Responsibility

Corporate and Digital Services.

Insights and Advisory.

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## Focus area 4: Access to facilities

Following Universal Design Principles and building beyond compliance delivers equitable and dignified access to our premises.

## Priority

Physical office environment.

## Action 4.1

- Conduct an accessibility audit of the new VPSC premises and develop a report for remedial action.
- Implement a Dignified Access Checklist to provide a strong foundation for ongoing accessibility.
- Ensure personal emergency evacuation plans (PEEPs) and workplace adjustments (including flexible work arrangements if required) are in place and regularly reviewed.

## Success measures

- Accessibility audit of premises has been completed, and a report prioritising

actionable recommendations is developed.

- Accessibility review of premises has been completed and a report developed that prioritises actions for implementation, depending on budget, necessary remedial actions from the audit are implemented.
- Any future changes to the physical office environment are made in accordance with Universal Design and Design for Dignity principles.
- The Dignified Access Checklist is adopted for annual accessibility audits by the OHS Committee, with improvements documented and addressed where feasible.
- Dignified Access Checklist used to conduct annual accessibility audits of VPSC's premises and recommended improvements recorded and rectified where possible.
- Personal emergency evacuation plans (PEEPs), workplace adjustments, and flexible work arrangements are implemented as needed, with regular assessments to ensure all employees are appropriately supported.

## Timeframe

Financial year 2024 to 2025.

## Responsibility

Corporate and Digital Services..

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## Focus area 5: Reporting, Governance and Continuous Improvement

Strong monitoring and review mechanisms ensures that VPSC remains accountable and focused on improving outcomes for people with disability.

## Priority

Workplace governance and continuous improvement.

## Action 5.1

Continuously monitor and review VPSC's access and inclusion activities to ensure they meet organisational needs. Provide regular reports to key stakeholders to ensure accountability, transparency, and continuous improvement.

### Success measures

- Progress and outcomes on actions within VPSC's Accessibility Action Plan are reported annually in the VPSC Annual Report, with the plan lodged with the Australian Human Rights Commission to demonstrate public commitment to accessibility.
- Regular reports on access and inclusion activities are provided to the Executive Management Board, HRWI Subcommittee, and People and Culture Committee for review, ensuring continuous improvement and accountability.
- Employment targets for people with disabilities are actively monitored and addressed, with recruitment strategies designed to increase representation where necessary.
- Incremental improvements in the employee experience of people with disabilities are tracked and evidenced through feedback from the People Matter Survey and other mechanisms.

### Timeframe

Ongoing.

### Responsibility

Corporate and Digital Services.





# Regulatory and policy context

Legislation, policies, standards and guidelines that govern the rights of people with disability.

Several pieces of legislation, policies, standards and guidelines exist that govern the rights of people with disability. These were considered when we developed our Accessibility Action Plan.

## International level

- United Nations Convention on the Rights of Persons with Disabilities (UN CRPD)
- Universal Design principles
- International Plain Language standards
- Web Content Accessibility Guidelines

## National level

- Australian Disability Network's Design for Dignity Guidelines
- Australia's Disability Strategy 2021 to 2031
- Disability Discrimination Act 1992 (Cth)
- Fair Work Act 1992 (Cth)
- Recommendations and findings from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

## State level

- Carers Recognition Act 2012 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)



- Disability Act 2006 (Vic)
- Equal Opportunity Act 2010 (Vic)
- Getting to Work, Victorian public sector disability employment action plan 2018 to 2025
- Inclusive Victoria State disability plan 2022 to 2026
- Victorian autism plan: 2023 refresh
- Victorian Government accessibility guideline for government communications

Throughout our plan, VPSC has addressed the four outcome areas of Section 38 of the Disability Act 2006 (Vic) which are:

- reducing barriers to persons with a disability accessing goods, services, and facilities
- reducing barriers to persons with a disability obtaining and maintaining employment
- promoting inclusion and participation in the community of persons with a disability
- achieving tangible changes in attitudes and practices which discriminate against persons with a disability.

