GRIFFITH UNIVERSITY

Procedure

Staff Disability Accessibility and Inclusion

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1.0 Purpose

This procedure operationalises principles in the Equity, Diversity and Inclusion Policy and outlines how the University promotes inclusion for staff with disability, including the provision of Workplace Adjustments.

2.0 Scope

This procedure applies to all staff of Griffith University.

3.0 Procedure

As a values-based university, Griffith is committed to promoting the rights of people with disability, ensuring that staff fulfil their potential and are provided a safe, accessible, supportive and inclusive work environment. We engage with the United Nations Sustainable Development Goals (SDGs) as a powerful articulation of our equity, diversity and inclusion values.

3.1 Environment and systems

3.1.1 Universal design

New buildings are designed for dignified access and use in accordance with the appropriate Building Code and design standards. Where appropriate (in alignment with the Capital Management Plan) access to existing buildings is being improved to comply with these Standards.

3.1.2 Information and communications technology

We aim to procure and implement software and hardware that is accessible for a diversity of people with disabilities. Griffith will continually review the accessibility range of technology platforms available. For example, we aim to comply with Web Content Accessibility Guidelines (WCAG) 2.1 AA Standards at a minimum. We proactively support and encourage the use of assistive software. Please reach out to the Health & Wellbeing team for assistance with this.

3.1.3 Emergency management

The University is required to ensure the safety of all people on campus in an emergency, including safe evacuation in an emergency. A Personal Emergency Evacuation Plan (PEEP) is a practical, individualised plan to ensure appropriate, agreed actions are taken for any individual requiring support in an emergency. This customised document outlines the specific requirements for emergency management for a person with a disability. If required, the Injury Management and Wellbeing team can provide guidance on the preparation of a PEEP.

3.1.4 Capability development

Staff are encouraged to undertake professional development on disability and inclusion to build their capability on disability access and inclusion.

3.2 Information about disability

Staff are not required to share information about their disability unless they require a workplace adjustment or alternative work arrangements, or it is likely to affect their ability to meet the inherent requirements of the job.

Staff are encouraged to liaise with their supervisor and/or Health & Wellbeing team. In consultation with the staff member, the line manager will determine whether Workplace Adjustments can be made informally, or facilitate a request for assistance being lodged with the Injury Management and Wellbeing team. Staff members seeking formal Workplace Adjustments may be required to provide reports or medical information, specifically relevant to the process of identifying adjustments, or confirming the staff member's requested adjustment. Any medical information requested will focus on the adjustment required to perform the inherent requirements of the job. Griffith University Enterprise Agreements outline that is some instances an independent medical assessment may be required to determine an appropriate approach.

If a staff member shares their disability information with their line manager, Human Resources (HR) and/or Injury Management and Wellbeing their personal information will be treated with respect and privacy in line with the Griffith University Privacy Statement.

3.3 Workplace adjustments

The Disability Discrimination Act 1992 (Cth) seeks to eliminate, as far as possible, discrimination against persons on the ground of disability, including in the areas of work, access to premises, provision of goods, facilities and services. Under the Anti-Discrimination Act 1991 (Qld) it is also unlawful to discriminate on the basis of an impairment.

Discrimination can include:

- the person with the disability being treated less favourably than a person without a disability; and/or
- not making, or proposing not to make Workplace Adjustments for the person with a disability.

An adjustment is considered reasonable unless it imposes an unjustifiable hardship11, and this will be considered on a case by case basis.

3.3.1 Making workplace adjustments

Workplace Adjustments are changes to work processes, practices or environments, to ensure staff with disability can perform their job, free from barriers. Workplace adjustments are typically made on an individual basis. A Workplace Adjustment is one that would not impose an Unjustifiable hardship on the employer and may include:

- use of noise-blocking headphones for a person who finds noise overstimulating
- magnification software to assist with computer screen magnification or text to speech software
- educating colleagues on inclusive practice related to a specific disability
- changes in hours of work, patterns of work and location of work
- making physical changes to the workplace (for example, installing height adjustable desks, or environmental modifications).

Injury Management and Wellbeing Partners can provide guidance on the process of requesting, assessing and making workplace adjustments. It is important to be in contact as soon as Workplace

Adjustments are deemed necessary for the employee to perform the inherent requirements of the job.

The University may consider several workplace adjustment proposals that would enable the individual to carry out the duties of their position. All reasonable adjustments should be made to facilitate access and inclusion unless it would amount to Unjustifiable hardship on the University.

3.3.2 Funding workplace adjustments

The University can apply for government funding through JobAccess, Employment Assistance Fund (EAF) to support a staff member with a permanent disability, providing JobAccess eligibility criteria are met. JobAccess is only available to Australian Citizens.

Internal funding for Workplace Adjustments for a staff member with disability may be met by the relevant school/element budget on a case-by-case basis.

For enquiries about Job Access funding and or applications please connect with Health & Wellbeing business partners.

3.3.3 Consultation with staff member with disability

The University recognises the individual staff's lived experience means that they are usually the expert in the best methods to support their health needs and workplace requirements. The University will consult with the staff member regarding the assessment process and the proposed Workplace Adjustment with open, clear and transparent consultation.

3.3.4 Inability to accommodate an adjustment due to unjustifiable hardship

In some circumstances, it may not be possible for the University to make certain requested Workplace Adjustments. This can be for a range of reasons, including but not limited to ensuring that the adjustment is safe for all people who use an area, and whether the nature of the request will create unjustifiable hardship for the University.

If the staff member does not agree with an outcome regarding an adjustment, this should be discussed with the staff member, their line manager and the relevant representative from Human Resources and the Injury Management and Wellbeing team to ensure that all factors have been considered and whether an alternative outcome could be reached. In circumstances where it is unable to be resolved, the staff member can escalate to the Relevant Senior Officer (RSO).

3.3.5 Review

Workplace Adjustments should be reviewed periodically, and ideally at least annually to ensure that the adjustments are still effective and/or necessary and take into account new developments in technology and innovation. For example, there may be instances when adjustments are no longer required or where additional alternate adjustments are needed.

3.4 Assistance animals

Staff may bring accredited, Public Access Trained (PAT) assistance animals to work. Suitable toileting options and water facilities for assistance animals will be required. Injury Management and Wellbeing Partners may be contacted about any health and safety queries related to assistance animals.

For some university environments, applications need to be made to bring animals on campus and should form part of a Workplace Adjustment plan (see Facilities Management and Campus Access and Use Policy and related Guideline and Form for more information).

3.5 Additional support

Staff are encouraged to make use of existing support and information within the University community as needed, including but not limited to:

- **Disability Advisory Committee:** The Disability Advisory Committee acts as a reference group for the University's Equity, Diversity and Inclusion Committee on matters relating to staff and students with disabilities.
- **Staff Network:** Staff can access support from peers through the Staff with Disability Network.
- **Employee Assistance Program:** The University's Employee Assistance Program has a Disability and Carers specialist phone help line which can provide staff with specialised advice on disability support, as well as emotional support around caring for family members or friends who live with disability.
- **On-campus escort service:** For staff and students who require assistance moving across campus, the Campus Support Team can arrange an escort to various on-campus locations such as someone's car or office. Call 1800 800 707.
- Health & Wellbeing team via healthandwellbeing@griffith.edu.au.

4.0 Definitions

Adjustment means a measure or action (or group of measures or actions) taken or supported by the University that has the effect of assisting staff with disability to perform to the best of their abilities and be as effective as possible to undertake requirements of their substantive role.

Assistance animal means, as defined by the Disability Discrimination Act 1992 (Cth), a dog or other animal:

a) accredited under a law of a State or Territory that provides for the accreditation of animals trained to assist a persons with a disability to alleviate the effect of the disability; or

b) accredited by an animal training organisation prescribed by the regulations for the purposes of this paragraph; or

c) trained:

   i. to assist a person with a disability to alleviate the effect of the disability; and

   ii. to meet standards of hygiene and behaviour that are appropriate for an animal in a public place.

Co-design means a participatory approach to designing solutions, in which community members are treated as equal collaborators in the design process

Disability: Griffith University supports the social model disability outlined in the United Nations Convention on the Rights of Persons with Disabilities definition of disability, which describes people with disability as people who have physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

The social model of disability … views disability as stemming from communities, services and spaces that are not accessible or inclusive. In the social model of disability, it is society that places limits on a person, not their disability (from Inclusive Victoria: State Disability Plan 2022-2026).

The Disability Discrimination Act 1992 (Cth) also defines disability in the following way:

in relation to a person:

- total or partial loss of the person's bodily or mental functions; or
- total or partial loss of a part of the body; or
- the presence in the body of organisms causing disease or illness; or
- the presence in the body of organisms capable of causing disease or illness; or
- the malfunction, malformation or disfigurement of a part of the person's body; or

- a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour

and includes a disability that:

- presently exists; or
- previously existed but no longer exists; or
- may exist in the future (including because of a genetic predisposition to that disability); or
- is imputed to a person.

To avoid doubt, a disability that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.

It is recognised that certain schemes that Griffith uses, for example, Job Access will have their own definitions and eligibility conditions.

Impairment means a diagnosed condition of a person with a disability.

Griffith University acknowledges that each staff member will have their own preference regarding how they identify. For example, some are protected under the Disability Discrimination Act 1992 (Cth) and have rights under the United Nations Convention on the Rights of Persons with Disabilities, but may not identify as a person with disability, or use the term 'impairment' to refer to a diagnosed condition. We encourage all line managers to be flexible and adapt when the staff member's preferences are known.

Inherent job requirements means a component of a position that is a genuine/essential requirement of that position and relates to the outcome and required quality, rather than how a job requirement is accomplished. It may include the ability to work safely in the position.

Workplace Adjustment means change to a work process, practice, procedure or environment that enables an employee with disability to perform their job in a way that minimises the impact of their disability. An adjustment to be made is a workplace adjustment unless making the adjustment would impose an unjustifiable hardship.

Relevant Senior Officer (RSO) ordinarily means, for the purposes of this procedure, the manager of the staff member's line manager. Guidance can also be sought from the following document: Delegations Register (see Type 'Staff: Academic Groups' and 'Staff: Administrative Divisions').

Universal design means the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people.

Unjustifiable hardship means (in determining whether unjustifiable hardship would be imposed) all relevant circumstances of the particular case are taken into account, including the following:

a) the nature of the benefit or detriment likely to accrue to, or to be suffered by, any person concerned;

b) the effect of the disability of any person concerned;

c) the financial circumstances, and the estimated amount of expenditure required to be made;

d) the availability of financial and other assistance;

e) any relevant action plans given to the Australian Human Rights Commission.

The burden of proving that something would impose unjustifiable hardship lies on the person claiming unjustifiable hardship. (Adapted from the Disability Discrimination Act 1992 (Cth)).

The Anti-Discrimination Act 1991 (Qld) also defines unjustifiable hardship.

5.0 Information

Title	Staff Disability Accessibility and Inclusion Procedure
Document number	2024/0001029
Purpose	This procedure sets out the processes that guide the University in supporting staff with disability, including the provision of reasonable adjustment.
Audience	Staff
Category	Operational
Subcategory	Staff
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal/s: 10: Reduced Inequalities 3: Good Health and Well-Being Select the relevant SDG
Approval date	8 April 2024
Effective date	8 April 2024
Review date	2027
Policy advisor	Senior Lead (Inclusion & Development)
Approving authority	Director, Human Resources

6.0 Related Policy Documents and Supporting Documents

Legislation	Anti-Discrimination Act 1991 (Qld) Disability Discrimination Act 1992 (Cth) Disability (Access to Premises - Buildings) Standards 2010 Fair Work Act 2009 (Cth)

	Human Rights Act 2019 (Qld) Public Interest Disclosure Act 2010 (Qld)
Policy	Code of Conduct Equity, Diversity and Inclusion Policy Staff Harassment, Bullying and Discrimination Policy Health, Safety and Wellbeing Policy
Procedures	Managing Incidents Standard
Local Protocol	Privacy Statement Strategic Plan 2020-2025
Forms	N/A