

# ERA Access and Inclusion Plan

**2023 - 2027**

## **Invitation for submissions**

The ERA invites interested parties to make submissions on this draft plan.

Submissions close **4:00 pm (AWST) Friday, 24 November 2023**.

Submissions can be lodged online using the form on our website [www.erawa.com.au/consultation](http://www.erawa.com.au/consultation)

Submissions are also accepted via email at [PublicSubmissions@erawa.com.au](mailto:PublicSubmissions@erawa.com.au) or post to Level 4, 469 Wellington St, Perth WA 6000.

If you would like to provide a submission another way, please contact the officers listed below to make arrangements:

Emily Robinson, (08) 6557 7900 or Danielle Asarpota, 0428 859 826 or email [info@erawa.com.au](mailto:info@erawa.com.au)

## **Acknowledgement of Country**

The offices of the ERA are located on Whadjuk Noongar Boodja.

At the ERA we value our cultural diversity and respect the traditional custodians of the land and waters on which we live and work.

We acknowledge their continuing connection to culture and community, their traditions and stories. We commit to listening, continuously improving our performance and building a brighter future together.

# Message from the CEO

[To be added following public consultation]

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## Economic Regulation Authority

The ERA is Western Australia's independent economic regulator. We support well-functioning markets, and make sure the delivery of water, electricity, gas and rail services in Western Australia is in the long-term interest of consumers.

Our monitoring, compliance and enforcement work aims to give businesses and consumers confidence that utilities markets run efficiently and effectively. We recognise that some consumers need extra support to make sure they have equal access to goods and services and opportunities to participate.

### ***Purpose***

As the State's independent economic regulator, our purpose is to benefit all Western Australians by promoting strong economic outcomes through effective regulation and decision making.

### ***Values***

**Integrity:** Our decisions and advice are based on transparent, unbiased and rigorous analysis. We do this in a way that is professional, ethical and accountable.

**Excellence:** Our people are experts and we are passionate about delivering high quality outcomes. We take pride in what we do and how we contribute to the economy and to the community.

**Trust:** We are trusted to be impartial and treat others in an equitable, respectful and inclusive manner. Industry and consumers trust us to be fair and even-handed when making decisions.

### ***Strategic Objectives***

#### **Embrace change**

- Proactively explore solutions to the challenges facing regulated markets.
- Be open and curious about new ways of achieving the best possible outcomes.

### **Openly engage and communicate**

- Remain informed and aware of stakeholder views through meaningful consultation.
- Communicate decisions clearly and appropriately for the audience.
- Be transparent, unbiased and inclusive.

### **Support well-functioning markets**

- Provide strong, evidence based regulatory decisions and advice.
- Consider the context of our decisions, both today and in the future.
- Enable markets to innovate and adopt new technologies.

### **Strengthen organisational culture**

- Enhance our people's capacity to be highly competent, adaptable and resilient.
- Cultivate a culture of innovation and regulatory excellence.

## Access and Inclusion in Western Australia

People can experience access and inclusion difficulties for a range of reasons including disability,<sup>1</sup> socio-economic status, living in an isolated or underserved location, low education level, age and gender, race or culture-based discrimination.

Access and inclusion barriers impact people's ability to fully participate in the economy and community. For example, people with disability have lower participation levels across all areas including education, employment and social and recreation activities. Statistics available through the Australian Bureau of Statistics indicate that a much lower percentage of people with disability are employed, compared to people without disability<sup>2</sup>. In addition, people with disability are less likely to be in labour force, compared to people without disability. This reduced participation leads to a large income gap with the median gross income of people with disability is less than half that of people without disability.

Increasing participation benefits everyone. Organisations with a diverse workforce benefit from a diverse range of skills and perspectives, are viewed more favourably by prospective employees and the wider community, have better employee engagement and retention and may have greater productivity and opportunity for innovation.

The ERA has removed the word "disability" from the title of this plan. The intent of this change is not to diminish our role in making sure people with disability are able to receive the supports they need. The new plan's development is an opportunity to promote access and inclusion as the default rather than the exception and that all people benefit from measures that enhance access and inclusion<sup>3</sup>.

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<sup>1</sup> Under the *Disability Services Act 1983*, a disability is a condition which:

- Is attributable to an intellectual, psychiatric, cognitive, neurological, sensory, or physical impairment or a combination of those impairments; and
- Is permanent or likely to be permanent; and
- May or may not be of a chronic or episodic nature; and
- Results in:
  - a substantially reduced capacity of the person for communication, social interaction, learning or mobility; and
  - a need for continuing support services.

<sup>2</sup> Australian Bureau of Statistics (2018), *Disability, Ageing and Carers, Australia: Summary of Findings*, ABS Website, accessed 11 October 2023.

<sup>3</sup> As the State Disability Strategy states on page 15 "*Inclusion is as valuable to our broader community as it is for people with disability. Inclusion makes us resilient, happier and economically and socially stronger*".

## Plan development

The Corporate Services area of the ERA Secretariat is responsible for this plan. ERA staff and stakeholders helped to write this plan and progress against the previous plan was considered. The plan, and progress reporting against the plan, is a requirement of *Disability Services Act 1983*.

### **Consultation Process**

#### *ERA Staff*

All ERA staff were invited to participate in the development of the plan. Removing the word 'disability' from the title of the plan resulted in increased staff engagement in plan development which suggests this helped more staff to see how the plan applied to them.

Staff were invited to complete a brief survey to explore their views on what access and inclusion means to them, their responses have been incorporated into this plan, where appropriate.

Staff were asked to complete the sentence “**I feel included at work when...**” Staff responses included:

- My work allows (and trusts) me to work remotely for periods of time to spend time with / care for family. I can choose what workspace works best for me on a given day.
- My manager asks me how I work at my greatest potential and how I would like to be managed, and we can agree on a method that works for both of us and other team members.
- I'm trusted with valuable work and the work I produce is valued.
- I like it when people in other teams explain their (complex) work in a way I can understand.
- I'm included in team meetings and can attend events with my ERA colleagues.
- Everyone respects each other without prejudgments.

Staff were also asked to suggest **things the ERA could do to show that we value providing equal access and inclusion to people of all abilities**. Staff responses included:

- Actively promote inclusion from within.
- Allowing flexibility in job design to allow people to do a portion of the work that is relevant for their skill set and which allows for changes in skills over time.
- Continue to support managers in developing effective outcomes-based management skills so that everyone is managed based on delivery of work that meets the needs of the Secretariat and ERA, and the ERA's customers and stakeholders and given the support necessary to enable them to do this.
- Offer key materials (including job adverts) in an audio format to increase accessibility.
- Continue to be kind when people need an accommodation at work.
- No great culture is created by one person, every one of us needs to make our effects to be kind and helpful to people who are physically unable to do what others thought to be easy.
- Working from home has been an important positive development in recent times, supported by proactive acceptance and use of MS teams/ chat as accepted and effective comms within teams.

### *ERA Consumer Consultative Committee*

The ERA sought feedback on the draft plan from the ERA Consumer Consultative Committee (ERACCC) in June 2023. ERACCC membership includes representatives from:

- community and social services
- consumer and consumer protection
- business interest groups
- regional WA
- local government.

ERACCC members discussed the removal of the word 'disability' from the title of the plan and that doing so must not diminish the plan's role in ensuring people with disability are able to receive the supports they need. Members also queried what audit mechanism is in place to monitor if objectives are achieved.

Members suggested ways to improve the accessibility of the document, including use of plain English, and other ways to promote the ERA's inclusiveness such as uploading relevant policies with job advertisements.

This feedback has been integrated into the plan or ERA internal processes, where appropriate.

### *Public consultation*

[To be added following public consultation]

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## Implementation, monitoring and reporting

All staff have a role in implementing the plan by actively taking part in initiatives. To support staff in implementing the plan, the ERA will make the necessary resources and training available. Staff will also be invited to participate in the design of strategies to implement this plan.

The Corporate Services division will monitor the plan's implementation and success.

The ERA's Annual Report will include progress updates and the ERA will submit progress reports to the Department of Communities as required by the *Disability Services Act 1983*.

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## Outcome 1: Services and events

All people have the same opportunities to access the services of, and any events organised by, the ERA.

### ERA context

The services the ERA provides to the general public are largely limited to opportunities to participate in consultation processes. The ERA holds a small number of events each year. These events are generally targeted at specific stakeholder groups e.g., energy market participants.

Strategies	Actions	Responsible (Lead)
Incorporate Access and Inclusion Plan outcomes across strategic and operational planning processes.	Staff will continue to be made aware of the Access and Inclusion Plan and their responsibilities through inductions, regular reminders and training opportunities.	Corporate Services
Ensure all ERA hosted events are accessible.	Create an accessible event checklist for staff to follow when organising events, which includes ensuring any venue hired is accessible and including accessibility information in promotional materials.	Office of the CEO

## Outcome 2: Buildings and facilities

All people have the same opportunities to access the building and other facilities of the ERA.

### ERA context

The ERA does not own any offices or facilities. Our offices are currently located on Level 4 of Albert Facey House which is owned by the Department of Finance and managed by an external property management company.

Strategies	Actions	Responsible (Lead)
Ensure all ERA facilities are accessible and inclusive.	Review signage to make sure it is accessible and inclusive.	Office of the CEO
	Where appropriate, advocate for improved inclusion and access to facilities used by ERA.	Corporate Services
	Make sure future refurbishment of ERA offices and facilities consider universal Accessibility standards.	Corporate Services
Ensure that ERA health and safety procedures meet the needs of people with disability and/or mobility requirements.	Fire Wardens continued to be trained in evacuation and safety procedures for people who require additional assistance during an emergency.	Corporate Services

### **Outcome 3: Information and communication**

*All people receive information from the ERA in a format that will enable them to access the information as readily as other people are able to access it.*

<p><b>ERA context</b></p> <p>The ERA conducts a large part of its business using digital means. All decisions, notices and documents are published on the ERA website. The ERA also uses targeted social media strategies to engage stakeholders.</p>
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<b>Strategies</b>	<b>Actions</b>	<b>Responsible (Lead)</b>
Ensure the ERA website is compliant with relevant standards and guides.	Design the new ERA website to be compliant with the Western Australian Government Website Accessibility Policy and Web Content Accessibility Guidelines 2.0, level AA or greater.	Office of the CEO  Office of the CEO
Ensure the ERA intranet is compliant with relevant standards and guides.	Review the ERA intranet against the Western Australian Government Website Accessibility Policy.	Office of the CEO
Ensure all ERA publications are accessible	Create an accessible publications guide to follow when creating publications and documents and update templates to meet accessibility requirements.  Provide guidance to staff on how to provide information in other formats.	Office of the CEO  Corporate Services with Office of the CEO

## Outcome 4: Quality of service

*All people receive the same level and quality of service from ERA staff.*

### ERA context

As outlined under Outcome 1, the services the ERA provides to the general public are largely limited to opportunities to participate in consultation processes. Other services are provided direct to the industries and organisations we regulate and other regulatory bodies.

Strategies	Actions	Responsible (Lead)
<p>Maintain and promote policies and codes of conduct that promote access and inclusion and prohibit discrimination, harassment and victimisation of employees and visitors.</p>	<p>Continue to include access and inclusion information in induction process.</p>	<p>Corporate Services</p>
	<p>Continue to include information on policies and codes of conduct in induction process including consequences of not meeting conduct expectations.</p>	<p>Corporate Services</p>
	<p>Provide regular reminders to staff on access and inclusion matters and conduct expectations.</p>	<p>Office of the CEO</p>

## Outcome 5: Complaints

*All people have the same opportunities to make complaints and provide feedback to the ERA.*

### ERA context

The ERA handles complaints about the services it provides in accordance with our complaints handling policy. The ERA does not handle complaints about the industries or businesses we license, these complainants are referred to agencies such as the Energy and Water Ombudsman.

Strategies	Actions	Responsible (Lead)
Ensure that complaint and feedback mechanisms are easily accessible.	Review current mechanisms for complaints and feedback handling for accessibility.	Corporate Services

## **Outcome 6: Consultation and engagement**

*All people have the same opportunities as others to take part in any public consultation by the ERA.*

### **ERA context**

The ERA primarily uses digital platforms to publicise consultations and to receive feedback. Submissions are encouraged through an online form or via email. Submissions can also be received via post.

<b>Strategies</b>	<b>Actions</b>	<b>Responsible (Lead)</b>
Ensure ERA consultation processes are accessible.	Review consultation mechanisms for accessibility. Investigate approaches to encourage more diverse participation in ERA consultations including people with disability.	Office of the CEO Office of the CEO

## Outcome 7: Employment and culture

All people have the same opportunities as others to obtain and maintain employment with the ERA.

### ERA context

The ERA undertakes all recruitment and employment activities in line with public sector standards and guidelines. In addition, staff are supported to access flexible working arrangements.

Strategies	Actions	Responsible (Lead)
<p>Ensure advertising and recruitment activities are inclusive and accessible in design.</p>	<p>Consider the Public Sector Commission People with Disability Action as part of the next review of the ERA Workforce Plan.</p>	<p>Corporate Services</p>
	<p>Continue to ensure advertising, recruitment and selection practices are in accordance with the <i>Equal Opportunity Act 1984</i>.</p>	<p>Corporate Services</p>
	<p>Provide guidance to staff involved in recruitment on accessible recruitment practices.</p>	<p>Corporate Services</p>
	<p>Where possible, investigate opportunities for targeted recruitment strategies to recruit and keep people with disability</p>	<p>Corporate Services</p>



Strategies	Actions	Responsible (Lead)
Support employees to perform their best at work.	<p>Continue existing flexible working arrangements and allowing reasonable workplace adjustments that enable all staff to work effectively.</p> <p>Provide training to managers to make sure they can support employees to perform their best at work.</p>	<p>CEO</p> <p>Corporate Services</p>

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