



**A guide to creating  
a disability inclusive  
diversity policy**

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## THINGS TO THINK ABOUT BEFORE YOUR ORGANISATION BEGINS ITS DISABILITY INCLUSIVE DIVERSITY POLICY

A disability inclusive diversity policy can promote employment for LGBTI+ people with disability. It can also result in advantages for your organisation, including increased staff retention, improved service delivery, and a more inclusive broader organisational culture.

LGBTI+ people with disability want organisations to consider the following practicalities as part of their disability inclusive diversity policy efforts:

- Actions over words with regards to Disability Inclusion Action Plans (DIAP), in terms of policies creating real-world benefits including access and adjustments for people with disability
- DIAP should be a living document that evolves as an organisation gets better at inclusivity over time – and be transparent, accountable, and include outcomes measurement
- A team of diverse staff should be involved in developing the DIAP
- Organisational-wide support, top-level leadership, inclusive practices and policies and cultural change (including staff training) rather than individual efforts, including in the creation and implementation of inclusivity projects
- An intersectional lens including race, disability, gender and sexuality
- Organisations need to manage expectations around their disability inclusion efforts and ensure these are realistic
- Making disability inclusion a part of regular meetings and workplace practices including a standing staff meeting agenda item
- Channels for LGBTI+ employees with a disability to complain, share concerns or offer feedback safely within an organisational context.

## STRATEGIES YOUR DISABILITY INCLUSIVE DIVERSITY POLICY CAN EMPLOY

There are a range of processes and supports your organisation can consider as part of developing and implementing a disability inclusive diversity policy. LGBTI+ people with disability who are seeking employment, or who are currently employed, can benefit from a range of formal and informal policies aimed at inclusivity, such as those tabled below.

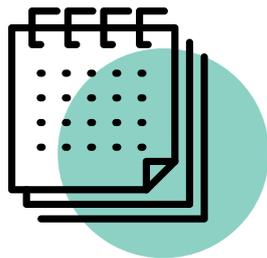
Area	Details
Recruitment processes	Thoughtful processes that offer accommodations proactively and only list true requirements that are inherent to the role e.g. people with epilepsy, blindness or visual impairment could be excluded from roles that list a requirement to drive.
Organisational training	LGBTI cultural competence training (including on pronouns) and disability awareness training for all staff including executives.
Inclusive facilities	Multiple all-gender or gender-neutral accessible bathrooms, ergonomic workspaces that may take into account light and noise sensitivity, and access to assistive technologies (e.g. screen-readers for blind or low-vision employees). Evaluation plans and risk management plans should also reflect people with disabilities.
Inclusive social events	Access extends to during and after-hours social events including accessible venues.
Flexible work arrangements	Part-time hours or working from home arrangements that still confer employment stability e.g. part-time ongoing employment contracts.
Confidentiality policies	Ensuring that HR and line managers protect people's privacy e.g. with regards to name and gender changes on pre-employment checks.
Complaints and grievances policies	A clearly explained grievance or complaints process covered during onboarding that covers: how people with disabilities who voice experiences of ableism will be kept safe, whether they will receive updates regarding their complaint, whether mediation and/or training is a part of the complaints process.
Funding disability access	Funding your organisation's Disability Inclusion Action Plans (DIAP), including disability access in budgets within business cases, funding applications, program budgets e.g. including a budget for Auslan interpreters.

## Being Able To Safely Access Paid Leave, Including Mental Health Leave, Promotes Lgbti Disability Inclusion

Paid leave is a particularly important inclusion strategy. Flexible, accessible and comprehensive paid leave supports LGBTI+ employees with a disability who may have medical issues requiring ongoing appointments e.g. intersex and transgender people may need to take time during business hours to see specialists. For written leave policies to be effective, it's important that leave-takers are not penalised or punished in any way for accessing leave. Offering mental health leave and counselling through an Employee Assistance Program (EAP) and reducing the need for staff to disclose their reasons for accessing sick leave including not requiring doctor's certificates, are other ways workplaces can support LGBTI+ people with disability.



**"It's actually my opinion, it's responsible to take time off. I see it really differently. I've burnt out severely in my first couple of years of social work and like, I paid a big price for that. And I think now I'm like, no, it's actually much more responsible and much less of a liability if you give yourself care ongoingly [and] you don't just wait until have a total burnout. So, I think just communicating that message in that it's a real positive to do that and to exercise what you need to exercise to support yourself so you can stay doing this work, you can stay in this job that's more sustainable than just pretending that you're okay."**



**For written leave policies to be effective, it's important that leave-takers are not penalised or punished in any way for accessing leave.**

Some organisations have concerns about leave policies being misused. It's important to keep in mind that gatekeeping leave or preventing or punishing staff from accessing leave will disproportionately affect people with disabilities. It's also worth noting that research shows that people with disabilities take less leave on average – fewer days off generally, less sick leave, and stay in jobs longer than other workers.<sup>1</sup>

A safe workplace culture involves LGBTI+ people with a disability being able to access the leave they need without fear of judgment. Without this, there are risks that the employee's professional reputation and stability of employment can be damaged.



**'Number one, would be culture. So, more understanding that there is diversity and that some of the employees may be intersex and they don't even know it. Also, a willingness to make allowances for people who have extra stuff happening. So, whether they're willing to allow some extra time off if a person needs to see a psychiatrist or a doctor to maintain their health. Because without health, you've got nothing. And if an employer wants to say 'no' to that, then that's irresponsible. That's basically saying, "no, I don't care about your health. I want you here." I think employers forget that they're employing human beings and not robots. I think also that they have too high of an expectation that the employees are going to be there 99.99% of the time. And if your health goes down, then your work output is going to be affected. And there's a big risk that the employer will not blame your health until you get some help but will blame you for being incompetent. And if anything, that will make your health worse, because you'll be blamed for your work and it's not because of your incompetence, it's because your health is being affected.'**

1. Australian Safety & Compensation Council Report, "Are People with Disability at Risk at Work?" May 2007

## **What happens if disability access is not an essential part of diversity inclusion policy in your organisation?**

When LGBTI people with a disability are not supported to participate in the workforce and access a range of employment opportunities, they face ongoing exclusion including economic, social and health disadvantages:



**“Without access and inclusion we can’t reach our full potential. Having [unmet] access requirements means we can’t actually contribute without removing the barriers that are in our way to contribute. So, you will never see our full selves, you will never know us and our offerings. There is no inclusion without access. We can’t talk about inclusion in any meaningful way without securing access, it’s not possible. So for example, if I don’t get a meeting agenda in an electronic format my access requirements are not met, I am not included in the meeting and even worse, symbolically I am not valued as an equal human, and subsequently, I am not given the opportunity to participate equally.**

**Accessibility and inclusion matters because so much of our lives are battling... we deserve to live, to work, to enjoy life. If I have to spend my entire day at work trying to secure my own access, I can’t actually get on with the job, which is certainly not satisfying at all! Accessibility and inclusion matters because we have fought hard for it for generations, our predecessors secured a United Nations Convention on the Rights of People with Disability which is basically a handbook of all areas of consideration of where access matters.”**

## **What are some of the pitfalls that organisations can encounter when developing or implementing disability inclusive diversity policy, including a DIAP?**

Disability access and inclusion can't begin with the organisation's first employee with a disability:



**"At the moment I think that is becoming a little bit of a... "yeah, we know we need to make this space accessible if somebody needs it." But you know, the challenge is that a space is only accessible for the people that can get in there to tell you that. If they're already on the outside of the building and can't get in to tell you, you're never going to know that they can't get in there to tell you."**

Effective disability inclusive diversity policy needs tangible organisational investment, engagement and resourcing:



**'To create an action plan for an organisation is one thing, to create an action plan that lives, breathes, is respected and embedded in the culture and practices of an organisation is another. In the former, you can download a template, put some organisational specifics in and send to employees. In the latter, it takes more investment of our time and our hearts.'**



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Organisations that don't resource their diversity strategies risk overly relying on a single champion who is not at the highest leadership level, who takes on diversity and inclusion leadership in an organisation. The negative impacts of this can include a high emotional cost being borne by the champion:



**"Organisations are so reliant on a champion, and champions either burn out or move on. Or they may not be connected to the right power levers within an organisation, so as much as they might really care, they just might not be able to influence it enough. So, I think the challenge is whether it speaks enough to the people who can do something about it."**

**"As the person in charge of writing and implementing a policy where I am, I fear having to justify it constantly and be told it's too much."**



Disability inclusive diversity policy can become ineffective when spending organisational funding on diversity and inclusion is not seen as essential to the business:



**“Yeah, I think resources are a big issue for small organisations and part of the problem is that thing gets used as an excuse for not doing things. So, things like having Auslan interpreters, we have to build those into a funding grants, because small organisations will struggle to find extra money for anything. And yet, it’s absolutely critical that we do those things. So, I think advocating to funding bodies to make you know everyone understands on-costs, everybody understands what’s in and out of funding, and a lot of accessibility methods are often seen still seen as additional extras.”**

The negative past experiences that some LGBTI+ people with disability have faced, including employment-related trauma, discrimination or stigma, may create distrust around new diversity and inclusion policies, initiatives or organisational cultural change attempts. Organisations may overcome distrust and rupture with proactive, visible proof of improvement. Decision-makers can also ensure that staff are fully trained in LGBTI+ and disability inclusion to ensure that diversity efforts are widely understood and supported.



**Organisations may overcome distrust and rupture with proactive, visible proof of improvement.**



**“It is hard because you just, you don’t want to trust people again after you’ve had these experiences. And so why on earth would you if you were genuinely struggling or need an extension or needed some more support at work? Why would you go back and disclose to your employer when you’ve had that experience? And I think that that’s a big part of the problem is, most people have had those negative experiences. So, the employer really has to prove that they’re not going to be like that.”**

**“For staff to understand why these changes are happening, they would all need to read this toolkit or something similar, which the higher-level decision makers may not want due to the level of scrutiny it could direct at them.”**

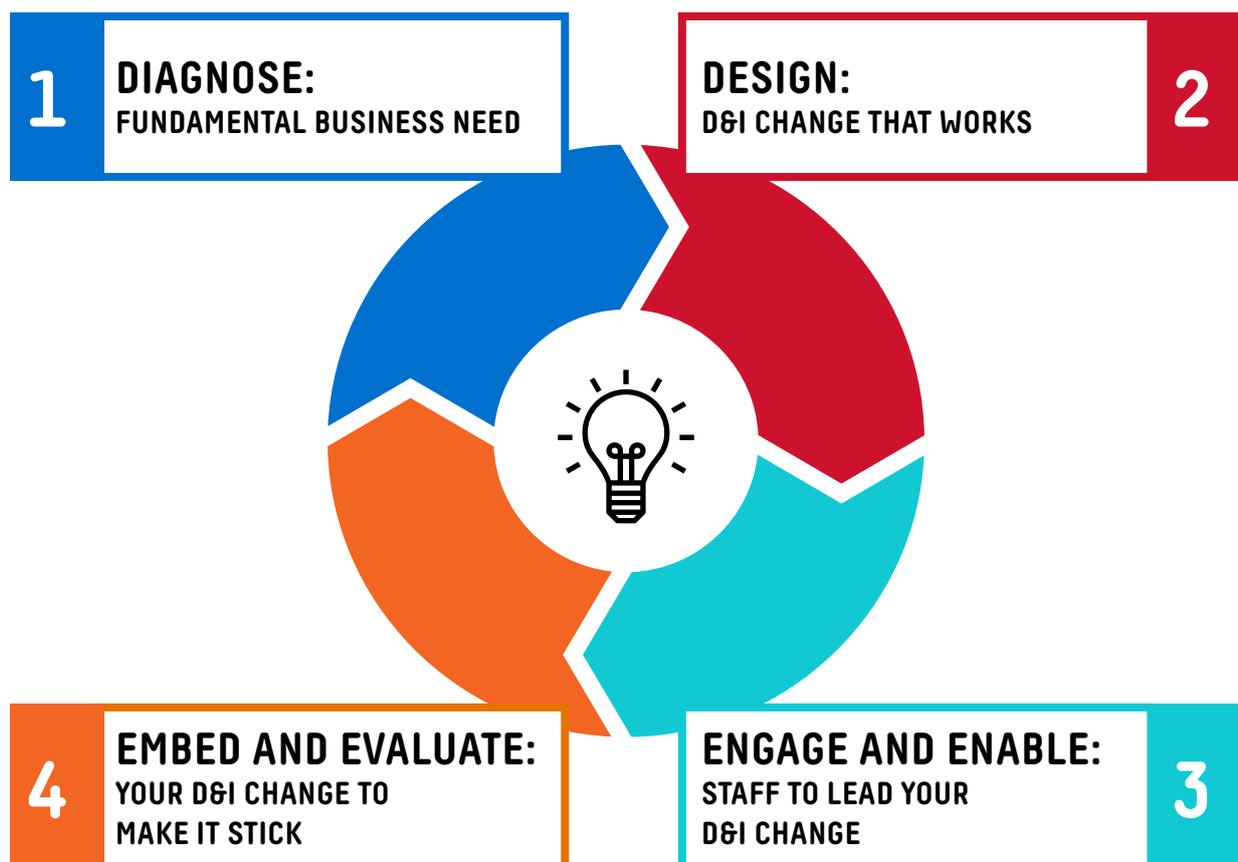
Policy preparation is different to policy implementation, and having a written diversity policy in place does not necessarily mean that LGBTI+ people with disability feel safe, comfortable or able to access it:



**“If you’re already being beaten down, you don’t have the energy, you’re suffering from anxiety and depression, you don’t often have the will to then start going through a complaints process. I think that the accountability measures need to be activated well before the point where you’re ready to make an official complaint.”**

## GETTING STARTED: THE STEPS TO DEVELOPING AN EFFECTIVE DISABILITY INCLUSIVE DIVERSITY POLICY

Diversity Council Australia identifies four steps to evidence-based diversity and inclusion policy:



*Image 1: A graphic showing the stages of diversity and inclusion policy development, from the Diversity Council Australia (Russell, G., O'Leary, J. and Rozsnyoi, J.) *Change At Work: Designing Diversity and Inclusion Differently to Achieve Organisational Change*, Diversity Council Australia, 2019.*



## **Is disability inclusive diversity policy a public priority for your organisation's leadership?**

The following questions can help to guide your early thinking in stage 1:

To your knowledge, does your organisation employ any people with a disability? (Remembering that your organisation may have staff with hidden or invisible disabilities who are not comfortable with sharing their disabled status with you as their employer).

To your knowledge, does your organisation employ any LGBTI people with a disability?

Does your organisation have a history of any kind of disability inclusion activity? If so, have past successes and failures been examined to inform new policies and initiatives?

Is funding available for training for all staff (including leaders and HR) in disability inclusion?

Is disability inclusive diversity policy a public priority for your organisation's leadership? Are you implementing diversity and inclusion change initiatives at every level including the team level?

What organisational resources, including financial, are available to support disability inclusion?

Has there been any investigation into your organisation's readiness for change?

Are you using a model of organisational change when designing and implementing diversity and inclusion initiatives, and if so which model of change?

Is your organisation setting and communicating realistic diversity and inclusion change-related goals and are there plans in place to monitor and evaluate the impact of initiatives?

It's important that diversity inclusion policy gets buy-in from existing staff and teams:



**"A disability action plan keeps organisations safe and on track for providing access, which is what the law requires. For every staff member to buy into a DIAP, internal consultations, which double up as capacity building, are a great way to start socialising accessibility and inclusion at all levels and formulate internal priorities according to capacity, from frontline workers to executive. Additionally, an external survey of a wide range of stakeholders will allow for more effective feedback and guide the formation of the DIAP. A benchmark study will also allow time to check other organisations' DIAPs."**

DIAPs can articulate your organisation's vision of inclusivity, cover a range of policies that reflect the different areas of working life, and include strategies for measuring improvements in diversity inclusion under the DIAP:



**"In a diversity policy, I would like to see a whole of organisation vision of accessibility in every aspect of work life. This means that a diversity policy acknowledges that disability can happen at any age, amongst any community and that the definition adhered to by the organisation reflects the social model of disability.**

**A diversity policy must have accessibility milestones that are actioned, measured, and evaluated. A preference for a diversity policy over a DIAP leaves the proactive attainment of access in jeopardy. Some organisations use a policy as the external facing document and the DIAP as an internal document, I guess it depends on how the organisation runs."**