

Accessibility Policy

Purpose

The purpose of this policy is to provide Greater Western Water (GWW) employees and customers with a clear outline of our commitment and obligations to equity and inclusion for people with disabilities.

At GWW we recognise the benefits of providing equity and inclusion for our people, our community and our business, so we can all achieve our full potential.

Scope

This policy relates to both physical and digital accessibility to enable an inclusive customer and employee experience.

This policy applies to all GWW employees (including prospective employees, contractors and any individuals or groups undertaking activity for or on behalf of GWW). This policy also extends to our customers.

Definition of disability

For the purposes of this policy, the definition of disability as stated under the *Disability Discrimination Act* is very broad and includes physical, intellectual, psychiatric, sensory, neurological and learning disabilities. Disability can be permanent or temporary, visible or invisible. Some conditions and impairments are present from birth. Other people acquire or develop disability during their lifetime from an accident, condition, illness or injury.

Our Commitment

GWW is committed to ongoing efforts to improve accessibility for people with disabilities, recognising that it is an evolving process. We are dedicated to striving for equality of access and experience, which will foster a safe, inclusive and respectful workplace for our employees and service for our customers, so everybody thrives.

We commit to:

- Develop and maintain a workforce that reflects the community we serve at all levels of the organisation.
- Create an equitable and inclusive workplace.
- Deliver inclusive and accessible products & services.
- Eliminate discrimination and remove barriers for people with disabilities.
- Engage people with lived experience to provide feedback on accessibility gaps and solutions.

- Apply the concept of intersectionality in all that we do, recognising that people with intersecting identities experience additional discrimination or exclusion. These include people women, different ethnicities, backgrounds, life experiences, faith, sexual orientations, gender identities, ages, socio-economic status.

Our commitment to accessibility will be delivered across two key focus areas, People and Digital:

People - Our Employees

Facilitate Reasonable Adjustments

GWW will provide reasonable adjustments to support employees with a disability, an illness or an accessibility need or requirement. Workplace adjustments are available throughout all stages of employment at GWW.

- GWW will provide an inclusive and accessible workplace and will make reasonable adjustments to support employees with diverse abilities.
- Adjustments are defined as a change to a work process, practice, procedure, or environment including flexible work practices, which enables a candidate or employee with disability and/or impairments, to perform the essential requirements of the job.
- Adjustments may include but are not limited to recruitment processes, performance of duties, access to equipment or technology and physical access to facilities.
- GWW will build knowledge and awareness on how to meet accessibility requirements and facilitate reasonable adjustments.

Facilitate inclusive attitudes and behaviours to eliminate discrimination

We will foster attitudes and behaviours that eliminate discrimination, remove bias and barriers to create a safe inclusive workplace.

- GWW will build awareness to ensure that all employees are clear on their responsibilities; and
- GWW will provide training on how to be inclusive of people with diverse abilities within the workplace and how to meet accessibility requirements for products and services for our customers.

Physical Accessibility – GWW workplaces

- Work towards ensuring all existing GWW offices and sites are accessible to meet the needs of current and future employees, through identification of gaps and create continuous improvement plans to meet current standards and best practice where applicable.

- GWW will deliberately plan in accessibility across our workspaces, offices and plants as we upgrade, renovate or build new work locations.

People – Our Customers and Community

- Facilitate inclusive attitudes and behaviours when interacting with customers.
- GWW will work to ensure all our events and engagement activities are accessible to people with diverse abilities.
- Use Equity Impact Assessments for all relevant GWW policies, programs and services to deliver equity for our customers and community.

Digital - Our Employees

- GWW commits to delivering accessible digital environments for our people including creating accessible documents, systems and training.
- GWW will work to ensure that newly purchased, licensed, or internally developed IT solutions will meet and where possible exceed accessibility standards, and existing platforms undertake regular review to comply with these requirements.

Digital – Our Customers and Community

Web Content Accessibility Guidelines (WCAG)

The [Web Content Accessibility Guidelines \(WCAG\)](#) are designed to make websites universally accessible. They also improve the experience of users with diverse abilities.

- GWW will meet and aim to exceed the most current WCAG guidelines for the GWW website.
- GWW will seek to ensure that key information is accessible to as many people with disability as possible, in multiple formats – in the form of hard copy, written format, orally by phone or through the use of Telephone Typewriter National Relay service (TTY), electronically – email, websites or online chat services. Including word versions for PDF documents.
- We will provide accessible services, products (letters, bills etc)
- Ensure GWW complies with Web Content Accessibility Guidelines.
- Incorporate accessibility when working with third-party vendors.

Produce and/or procure accessible digital assets

- GWW commits to facilitating accessible digital environments, whereby the creation or procurement of internal and/or customer facing assets/content (static or dynamic) are created to pass accessibility guidelines and standards. Assets and content can include such things as:

- website, intranet, applications (including web forms and web applications), portals;
- video;
- phone Interactive Voice Recording (IVR);
- documents (Portable Document Format (PDF), Microsoft Word, PowerPoint, Excel etc); and
- internally used web and non-web-based systems/software etc.

In working with Third-Party vendors

- We commit to engaging third-party vendors, supplying web or non-web-based-software/systems (internal or customer-facing), or static or dynamic design collateral who are aware of:
 - a. our Accessibility Policy; and
 - b. our preference for partners and providers who can demonstrate accessibility conformance, such as:
 - i. documentation detailing the level of accessibility of their product (against applicable framework/s);
 - ii. the products future roadmap detailing accessibility considerations and improvements; and
 - iii. compliance with any of the relevant standards outlined earlier.

Legislative Requirements and Standards

We aim to comply with state and federal legislation, international and Australian accessibility standards, and internal policies, including but not limited to the:

- [Disability Act 2006 \(Vic\)](#)
- [Disability Discrimination Act 1992 \(Commonwealth\)](#)
- [Equal Opportunity Act 2010 \(Vic\)](#)
- [Charter of Human Rights and Responsibilities Act 2006 \(Vic\)](#)
- [Disability \(Access to Premises – Buildings\) Standard 2010 \(APS\)](#)
- [Building Code of Australia \(2019\) \(BCA\)](#)
- The World Wide Web Consortium (W3C)
 - [Web Content Accessibility Guidelines \(WCAG\)](#)
 - [Authoring Tool Accessibility Guidelines \(ATAG\)](#)
 - [User Agent Accessibility Guidelines \(UAAG\)](#)
- The Australian Accessible ICT Standard [AS EN 301 549:2016](#).
- Other relevant Australian Standards.

Roles and Responsibilities

Accessibility is everyone's responsibility.

All GWW leaders are responsible for:

- Creating and maintaining a safe, inclusive workplace by role modelling inclusive behaviours and responding to inappropriate behaviour;
- Demonstrate a commitment to addressing bias and discrimination to ensure fair and equitable recruitment and retention of people with a disability;
- Taking a strengths-based approach to support people with diverse abilities, and finding the most effective ways to support them in achieving their full potential;
- Fostering an environment where people with disabilities and/or impairments are empowered to be themselves;
- Provide reasonable adjustments for employees who identify as having an impairment/disability, so they thrive in their roles; and
- Ensuring their teams are aware of and adhere to this policy.

All GWW employees and contractors are responsible for:

- Demonstrating behaviours that support a GWW to build a safe, inclusive and respectful workplace where everybody can thrive;
- Recognising and embracing the diversity and strengths that people with disabilities bring to our workplace;
- Reporting any alleged or potential behaviours that contravene this policy or relevant legislation;
- Taking all reasonable steps to uphold this Accessibility policy; and
- Preventing and addressing any form of unlawful discrimination, harassment, bullying or victimisation in the workplace.

Related Policies and Procedures

- Code of Conduct
- Diversity, Equity and Inclusion Policy
- Safe, Inclusive and Respectful Workplace Policy
- GWW EEO Discrimination, Harassment & Bullying Guidelines
- GWW Disputes and Grievance Procedure
- Health Safety and Wellbeing Policy
- Customer Support Policy

Review process

This policy was drafted in consultation with GWW employees with lived experience and the Australian Network on Disability and will be reviewed every two years.

Approved by the ELT on 23 May 2024

Next due for review by the ELT on May 2026

Version control table

Version Number	Document Owner's Position Title	Purpose/Change	Date
<i>Vx-0</i>	<i>Insert Document Owner's Position Title</i>	<i>Outline purpose of the change or summary of changes in 1-2 lines. You can also mention section names or numbers that have changed</i>	<i>DD/MM/YYYY</i>
V1.0	D&I Strategic Advisor	New Policy for Greater Western Water	17.03.22
V2.0	D&I Strategic Advisor	Biennial Review	23.05.24