

# **FEDERATION SQUARE DISABILITY ACTION PLAN**

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# Federation Square Disability Action Plan

## 1. Introduction

Opened at the end of 2002, Federation Square is Melbourne's civic heart, having attracted well over 35 million visitors.

The city's most contemporary architectural statement has become a thriving meeting place for locals and visitors alike, a focal point for community and cultural activity and one of Australia's most awarded developments.

A 5.2 hectare city precinct comprising the major civic square, external performance spaces, a large atrium space, a four hundred seat performance space and 34 tenancies and operations including the National Gallery of Victoria (Australian Collection), the Australian Centre for the Moving Image, Australian Racing Museum, Special Broadcasting Service, the National Design Centre, Kirra Gallery, the Melbourne Visitor Centre, riverside areas and landing, garden areas quality restaurants, cafés, bars and car parking.

Federation Square's architecture and urban design impact has seen it achieve more than 30 national and international awards including the International Urban Land Institute's 2005 Award for Excellence. The zinc, glass and sandstone structures are now iconic for Melbourne. In 2006 it became Victoria's major tourism attraction.

More than 1800 events occur in the public spaces each year, the majority of which are free. Over 50 million people have visited since opening and "Fed Square" is the city meeting place, its "live site" for outdoor broadcasts, home of more than 20 different multicultural events and festivals, central place for rallies, promotions and community events, unique location for music performance and increasingly a critical creative partner in the community and cultural life of Melbourne.

It is consistently ranked in 'Top 3' attractions for Victorians, interstate and overseas visitors and 75% of Victorians have now been to Fed Square since opening. On-site Visitor satisfaction is 99% and Victorians strongly embrace Federation Square with 88% believing it is great for Melbourne.

Federation Square Pty Ltd is now consolidating early success and developing the Square and its program for the future. **Its aspiration is for Federation Square to be acknowledged as a contemporary world site and Melbourne's inspirational public square.** Its strategic focuses are:

### ***International position***

*Federation Square will operate as a world site, embrace cultural diversity and be recognised nationally and internationally for its architecture, activities and operations*

### ***Leading Edge***

*Federation Square will be a place for exciting ideas and inspiring experiences and it will foster bold expressions of contemporary culture.*

### ***Great Visitor experience***

*Federation Square will be recognised for its exceptional service experience and have visitors wanting to return time and time again.*

### ***Community Ownership***

*The community of Victoria will see Federation Square as its primary meeting, gathering and celebrations place*

**Financial sustainability**

*Ensure a long-term sustainable financial position underpinned by best practice governance, with a financial model and risk management program that ensures Federation Square's long-term prosperity and viability.*

**Operator success**

*Fed Square Pty Ltd will collaborate with and support the cultural and commercial operators to ensure ongoing mutual benefit.*

**A strong Fed Square Team**

*Fed Square Pty Ltd will develop and support its staff to operate effectively in a small, responsive, flexible and innovative team.*

**Long Term asset value**

*Federation Square will be maintained and developed physically to ensure the highest standards of contemporary presentation and community approval*

**PURPOSE**

*To this end Fed Square Pty Ltd wishes to be proactive in ensuring all members of the community can enjoy its facilities and services and this Disability Action Plan, the development and implementation of which is included in the corporate plan, takes into consideration the strengths and limitations of the site and its operations and outlines actions to be undertaken over the next 5 years.*

## **2. Background**

In 2004, FSPL developed a Disability Action Plan with the assistance of independent disability management consultants. That plan comprised actions relating to physical access, accessible products and services, training activities, non discriminatory policies, feedback and monitoring procedures. A list of actions completed from 2004 up to and including June 2007 is listed in Appendix B.

Notwithstanding this comprehensive program, FSPL had representations from individuals and organisations concerned with limitations, in the main, to physical access on and within the site. Furthermore opportunities has arose which have enabled FSPL to provide new methods of engagement across the community, primarily via technology and the growth and diversity of what has become an very busy and successful annual program of activities supported by a very high media profile.

City of Melbourne data indicates that it is likely that between 15 and 20% of visitors to Federation Square may have a disability.

The revised action plan that was developed in 2007 took these inputs into consideration and at the same time recognised that initiatives will also be a function of the existing design and architectural integrity of the site and the availability of resources over time. Actions completed between 2007 and June 2009 are listed in Appendix C with the projects yet to be completed listed in Appendix A.

## **3. The Commonwealth Disability Discrimination Act 1992 (DDA)**

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. It is a means of ensuring that people with disabilities are treated as equally as those people without a disability and includes the provision of goods and services, access to buildings and employment.

Disability is broadly defined and the Act's provisions apply to a wide range of life activities.

The specific intent of the DDA (1992) is:

- To eliminate, as far as possible, both direct and indirect discrimination against persons on the grounds of disability.
- To ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community.
- To promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

The definition of discrimination as defined by the DDA (1992) is clear and comprehensive:

- It is discriminatory to treat people with a disability less favourably than people without the disability would be treated under the same circumstances.
- Discrimination also exists where a condition or requirement is imposed, which may be the same for everyone, but which unfairly excludes or disadvantages people with a disability.
- Further, it is prohibited to discriminate not only against people who have a disability, but also against a person who is an associate of a person with a disability e.g. a spouse, or carer.

For the purposes of this Action Plan a “disability” is defined in accordance with the DDA and includes:

- Physical
- Sensory
- Intellectual
- Neurological
- Learning Disabilities
- Physical Disfigurement
- The presence in the body of disease causing organisms

#### **4. Implementation**

The Disability Action Plan identifies actions and responsibilities for implementation. A priority of high, medium or low has been allocated to all actions. These will be reviewed annually as part of an annual review process to ensure that the priorities are still relevant. Actions that are classified as “ongoing” will be programs that are either already in place or programs that will be developed and will continue over the life of this Plan.

#### **5. Objectives**

The overall objective of this plan is to improve the equity of access for people with disabilities. The plan also focuses on activities which create a more inclusive community in which people with a disability have enhanced opportunities to participate.

These objectives will be realised through:

- Support, consultation, advocacy activities and partnerships
- Progressive upgrade to the quality of physical access to buildings and facilities
- Training for FSPL and site staff to increase awareness of disability issues
- Accessible communications
- Broadbased and accessible programming
- Feedback and monitoring

**DISABILITY ACTION PLAN - ACTIONS**

| <i>Action</i>   | <i>Responsible Section</i>   | <i>Priority</i>    | <i>Activity / Works</i> | <i>Performance Indicator(s)</i>                             |  |
|---|--|--------------------|-------------------------|---|--|
| <b>1 BUILDINGS AND FACILITIES</b> <i>will be progressively upgraded to provide equal access for all</i> |  |                    |                         |   |  |
| <b>1.1 Building Upgrades / New Works</b>  |  |                    |                         |   |  |
| 1.1.1   | Progressively implement access improvement projects including but not limited to those list in Appendix A.   | Operations         | High                    | Varies  | Works completed as per agreed timing. Dependant upon funding.  |
| 1.1.2   | Upgrades / new works to comply with relevant standards (AS1428). All new works to be signed off by FSPL Access Consultant.   | Operations         | Ongoing                 |   | Appropriate sign off by FSPL Access Consultant for any new works.  |
| <b>1.2 Tenant Applications/Approvals</b>  |  |                    |                         |   |  |
| 1.2.1   | Ensure tenants are made aware of the need to comply with relevant standards when undertaking works.  | Operations         | Ongoing                 | Develop standard statement to be included in all approvals. | All new tenant works to comply with relevant standards.  |
| 1.2.2   | Ensure tenants understand their obligation under the lease to comply with all legislation including the DDA.   | Corporate Services | High                    | Tenants reminded of obligations at regular discussions      | Improved tenant compliance with DDA.   |
| <b>1.3 Public Toilets</b>   |  |                    |                         |   |  |
| 1.3.1   | The public accessible toilets located in the Atrium, St Paul's Court and the Car park are to be maintained to a high standard to ensure maximum accessibility. All maintenance items associated with these facilities shall have priority. | Operations         | Ongoing                 | Regular maintenance checks.                                 | Accessible toilets are available at all times. Any defects identified should be rectified within 24 hours. |
| <b>1.4 Accessible Paths of Travel</b>   |  |                    |                         |   |  |
| 1.4.1   | Accessible paths of travel are to be kept clear at all times   | All                | High                    | Daily inspections   | Minimal limitations to access.   |
| 1.4.2   | Determine a suitable solution to accessibility through the Plaza   | Operations         | High                    | Develop solution  | Solution identified and programmed   |

| <b>Action</b>  | <b>Responsible Section</b> | <b>Priority</b> | <b>Activity / Works</b>                                     | <b>Performance Indicator(s)</b>  |
|--|----------------------------|-----------------|---|--|
| <b>1 BUILDINGS AND FACILITIES</b> <i>will be progressively upgraded to provide equal access for all</i>                    |                            |                 |   |  |
| <b>1.5 Parking</b>   |                            |                 |   |  |
| 1.5.1 Ensure adequate car parking spaces are available for people with disabilities.                                       | Operations                 | High            | Maintain existing spaces                                    | Standard maintained.   |
| 1.5.2 Ensure spaces are adequately signed and marked   | Operations                 | High            | Regular inspections to ensure compliance                    | Spaces suitably identified   |
| 1.5.3 Increase accessible parking for specific events where higher use is anticipated                                      | Marketing & Program        | High            | Incorporate planning into event checklist                   | Increased spaces as required   |
| <b>1.6 Signage</b>   |                            |                 |   |  |
| 1.6.1 Work with City of Melbourne to develop a way-finding signage program for Fed Square and its surrounding environment. | Operations                 | Medium          | Develop way-finding program                                 | Improved accessibility   |
| 1.6.1 Liaison with Tenants in regards to appropriate signage for their businesses  | Operations                 | Medium          | Provide advice through Good Access is Good Business forums. | Provide relevant information to tenants to ensure they are aware of their obligations. |
| <b>1.7 Seating</b>   |                            |                 |   |  |
| 1.7.1 Adopt a preferred design for new public seating to ensure compliance with AS 1428.2                                  |                            | Medium          | Design adopted and implemented for any new seating          | Positive feedback on accessible seating.   |

| <b>Action</b>  | <b>Responsible Section</b> | <b>Priority</b> | <b>Activity ./ Works</b>                | <b>Performance Indicator(s)</b>   |
|--|----------------------------|-----------------|---|---|
| <b>2 EMPLOYMENT &amp; TRAINING</b> <i>will be available to improve staff awareness.</i>  |                            |                 |   |   |
| 2.1 Indicate in FSPL's employment advertisements that Fed Square Pty Ltd is an Equal Opportunity Employer.                                     | All                        | High            | Include in copy.                        | Advertisements indicate EEO status  |
| 2.2 Continue to implement non discriminatory employment policies at FSPL. Communicate employment policy to all staff                           | Corporate Services         | Medium          | Staff induction to include policy.      | Ensure all staff are aware of employment guidelines and non discriminatory employment practices |
| 2.3 Develop and provide relevant information to new staff as part of the induction program, regarding disability access issues and FSPL's DAP. | All                        | High            | Staff induction to include information. | Relevant information provided in the induction program  |
| 2.4 Proactively promote the return to work of any staff acquiring a disability during their time of employment at the FSPL                     | All                        | High            | Return to work practices.               | Increase the success rate of return to work for people with disabilities                        |
| 2.5 Host Good Access is good Business forums to improve disability awareness of FSPL staff and tenants.  | All                        | High            | Liaise with provider.                   | Host forums once a year and encourage all tenancies to be involved                              |

| Action  | Responsible Section | Priority | Activity / Works  | Performance Indicator(s)  |
|---|---------------------|----------|---|---|
| <b>3 COMMUNICATIONS</b> <i>will respond to the needs of people with disabilities.</i>   |                     |          |   |   |
| <b>3.1 Publications</b>   |                     |          |   |   |
| 3.1.1 Review use of font sizes and styles in all publications to ensure they are appropriate so people with disabilities are not disadvantaged in accessing FSPL information.   | Marketing & Program | Medium   | Develop and utilise suitable standard font templates  | Information is deemed 'accessible' via survey.  |
| 3.1.2 Publicise and make available where appropriate, FSPL publications and information in alternative formats to standard print.   | Marketing & Program | Medium   | Publications produced in suitable alternative formats where appropriate (e.g. large print and Audio). | Information is deemed accessible.   |
| 3.1.3 Ensure all tenants are provided with Accessibility maps for visitors to Federation Square.  | Marketing & Program | Medium   | Ensure all tenants have access maps and distribute them.  | Information is available to all.  |
| 3.1.4 Broaden publication distribution to ensure people with disabilities can access information such as employment.  | Marketing & Program | Medium   | Increased circulation of publications   | Market response increases.  |
| <b>3.2 Tenders &amp; Contracts</b>  |                     |          |   |   |
| 3.2.1 Develop Standard clause for incorporation into documentation for tendering of FSPL works and services to ensure contractors demonstrate a commitment to, and compliance with, EEO and DDA (1992) and AS1428-1 – AS1428-4 for appropriate projects.<br>To be considered during: <ul style="list-style-type: none"> <li>• Preparation of tender documents</li> <li>• Evaluation of tenders</li> <li>• Performance of contracts</li> </ul> | All                 | Medium   | Develop and include Standard clauses.   | Compliance with EEO and DDA (1992) to be: <ul style="list-style-type: none"> <li>• Included in relevant tender documents</li> <li>• Considered as part of tender evaluation</li> <li>• Managed as part of contractors' performance</li> </ul> |

| <b>Action</b>   | <b>Responsible Section</b> | <b>Priority</b> | <b>Activity / Works</b>   | <b>Performance Indicator(s)</b>                                  |
|---|----------------------------|-----------------|---|--|
| <b>3 COMMUNICATIONS</b> <i>will respond to the needs of people with disabilities.</i>   |                            |                 |   |  |
| <b>3.3 Community Information</b>  |                            |                 |   |  |
| 3.3.1 Ensure that the design of the FSPL web site achieves Level AAA conformity to the Web Accessibility Guidelines.  | Marketing & Program        | Medium          | Upgrade website where required.   | Website meets AAA Web Accessibility Guidelines at annual review. |
| 3.3.2 Display Access Cards on all customer service counters.  | Corporate Services         | Medium          | Distribute cards and replenish.   | Display visible on all FSPL public counters                      |
| 3.3.3 Install TTY system at FSPL reception.   | Corporate Services         | Medium          | TTY system installed  | Complete within timeframe.                                       |
| 3.3.4 Ensure that TTY numbers and other mechanisms for contacting FSPL are promoted, and included in all corporate/community publications. Ensure all staff are aware of what TTY is and how to operate it. | Corporate Services         | Medium          | TTY number included in every public document.                             | Complete within timeframe.                                       |
| 3.3.5 Ensure existing Hearing Loop infrastructure in the Atrium & BMW Edge is available at all times.   | Marketing & Program        | High            | Hearing loops checked on a regular basis to confirm they are operational. | Minimal disruption to use.                                       |
| 3.3.6 Install a hearing loop in the Plaza for use with the big screen.  | Operations                 | Medium          | Hearing loop installed.   | Complete within timeframe.                                       |

| <i>Action</i>   | <i>Responsible Section</i> | <i>Priority</i> | <i>Activity / Works</i>                                 | <i>Performance Indicator(s)</i>                               |
|---|----------------------------|-----------------|---|---|
| <b>4 ADVOCACY will occur through FSPL to improve accessibility.</b>   |                            |                 |   |   |
| 4.1 Develop a tenant manual for tenants and staff outlining responsibilities and benefits of access compliance to DDA.          | All                        | High            | Manual developed and distributed                        | Engagement of tenants and staff.                              |
| 4.2 Advocate for and support businesses to be accessible to people with disabilities.   | All                        | High            | More accessible businesses throughout Federation Square | Business operators complying with their obligations.          |
| 4.3 Encourage tenants to make their premises accessible, through the provision of annual "Good Access is Good Business" forums. | All                        | High            | Ensure majority of tenants are represented at "Forums"  | Business operators comply with obligations and are proactive. |

| <i>Action</i>  | <i>Responsible Section</i> | <i>Priority</i> | <i>Activity / Works</i>   | <i>Performance Indicator(s)</i>  |
|--|----------------------------|-----------------|---|--|
| <b>5 FSPL PROGRAM will respond to the needs of people with disabilities.</b>   |                            |                 |   |  |
| 5.1 Develop an Event Access Checklist, which will assist in the organisation and planning of public event activities. Checklists should identify issues of parking, physical and sensory access, accessibility of toilet locations, availability of seating and information needs of people with disabilities. | Marketing & Program        | Medium          | Checklist developed and implemented                               | People with disabilities have equal access to all events.                    |
| 5.2 Design and make available for distribution a location map indicating access arrangements for all FSPL events.  | Marketing & Program        | Medium          | Ensure distribution included in all event planning.               | Access maps available for all events   |
| 5.3 Maintain FSPL's affiliation with the Companion Card Scheme.  | Marketing & Program        | Medium          | Ongoing affiliation with scheme and promotion to event organiser. | People with disabilities have equal access to all events.                    |
| 5.4 Actively support events which support people with disabilities.  | Marketing & Program        | Medium          | Host relevant activities at Federation Square.                    | Increased engagement with organisations supporting people with disabilities. |
| 5.5 Integrate the Mobility Centre into existing marketing.   | All                        | High            | Undertake an extensive support program.                           | Increased usage of the Centre.   |

| <i>Action</i>  | <i>Responsible Section</i> | <i>Priority</i> | <i>Activity / Works</i>               | <i>Performance Indicator(s)</i>                                 |
|--|----------------------------|-----------------|---------------------------------------|---|
| <b>6 CONSULTATION</b>  |                            |                 |                                       |   |
| 6.1 Submit the DAP to the Human Rights and Equal Opportunity Commission (HREOC) for formal registration after adoption by FSPL Board.  | Operations                 | High            | Complete plan.                        | DAP lodged with HREOC   |
| 6.2 Host forums including with staff on disability issues to identify / address disability access issues across the organisation.  | Operations                 | Medium          | Host forums once every 6 months.      | Proactive cost effective solutions and opportunities generated. |
| 6.3 Consult with Melbourne City Council to inform them on our DAP progress.  | Operations                 | High            |                                       | Meet with MCC every 6 months.                                   |
| 6.4 Continue current access questions as part of our Customer Satisfaction Survey and extend questioning where appropriate to obtain more information about possible improvements. | Corporate Services         | Medium          | Yearly questionnaire.                 | Access is rated 'very good' across a range of dimensions.       |
| 6.5 Actively promote the DAP whilst supporting events / activities which involve people with disabilities.   | All                        | High            | Advocacy discussions and information. | Increased awareness of DAP program                              |
| 6.6 Carry out an annual review of the DAP taking into consideration items that arise through various feedback streams.   | Operations                 | Medium          | Annual review.                        | Projects completed and new initiatives planned.                 |

## **APPENDIX A**

# **FEDERATION SQUARE - ACCESS IMPROVEMENT PROJECTS**

**FEDERATION SQUARE - ACCESS IMPROVEMENT PROJECTS**

| <b>Item</b> | <b>Action</b>  | <b>Location</b> | <b>Responsible Section</b> | <b>Priority</b> |
|-------------|--|-----------------|----------------------------|-----------------|
| 21          | Completion of tactile program  | Various         | Operations                 | High            |
|             | Other locations as they are identified   | N/A             | Operations                 | High            |
| 22          | Improvements to lift signage   | BMW Edge        | Operations                 | High            |
| 24          | Accessible ramp identification   | Atrium          | Operations                 | High            |
| 27          | Improved way finding signage   | Various         | All                        | High            |
| 28          | Accessible seating for performances  | BMW Edge        | Operations                 | Medium          |
| 29          | Appropriately located accessible seating (staged program over 5 years)   | Various         | Operations                 | Medium          |
| 30          | External handrail upgrade to comply with Australian Standards (staged program over 5 years)                      | Various         | Operations                 | Medium          |
| 31          | Investigate the use of evacuation chairs for people with a mobility impairment for use in emergency evacuations. | Various         | Operations                 | Medium          |