



The Greater Metropolitan
Cemeteries Trust
Lasting memories, peaceful places.

2020 – 2025 Disability Access and Inclusion Plan

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At the Greater Metropolitan Cemeteries Trust (GMCT) our focus is on care, kindness and respect. We are committed to making our facilities and services inclusive of all people within our diverse community. As part of our commitment, we have undertaken a review of our organisation and have developed GMCT's first Disability Access and Inclusion Plan (DAIP).

This access and inclusion plan marks a tangible, positive step towards becoming a fully inclusive organisation. We have consulted comprehensively to ensure our future planning is on firm foundations. Our engagement approach determined that we needed to work with a wide range of stakeholders, including people with disability and disability organisations, GMCT staff and leadership, the Community Advisory Committee and GMCT's Trust Board. We have worked together, diligently, to develop this plan so that it reflects our joint leadership and vision for the future.

GMCT seeks to continuously improve access to its services and facilities through a range of methods. Besides fulfilling our compliance obligations to current building standards, we will investigate and leverage the transformative power of new technologies, practices and research to deliver a more inclusive cemetery service. Our staff are our most valuable asset and are essential to delivering this plan. Therefore training and awareness raising will feature significantly, assisting our employees to support our customers and partners.

Our work is intricately linked with grief and the grieving process. During consultation the question arose as to whether grief should be considered as an acquired, temporary disability. The associated emotional trauma of grief and impact on functioning does indeed meet the accepted broad definition of disability. Our staff often encounter people in the early stages of the grief process and the added support of the DAIP will help to us to deliver an exemplary service with insights from both the grief and disability sectors.



We will continue to be the caring institution our communities deserve, supporting our families and individuals through this sad period in their lives.

Cemeteries and memorial parks represent a major public social investment by societies. For GMCT, the DAIP 2020 – 2025 is central to delivering a leading cemetery service that is accessible for, and enjoyed by, all members of the community.

GMCT is responsible for 19 cemeteries and two greenfield sites across the Melbourne region, some of which are very old and have unique physical environments. We will strive to make improvements at these legacy sites, whilst planning for and achieving excellence in our newest developments.

While the focus of the DAIP is on meeting the needs of people with disability, their families and carers, the resulting improvements will benefit everyone.

Acknowledgements

We would like to thank GMCT's Community Advisory Committee, the Disability Access and Inclusion Working Group, Vision Australia (representing people who are blind or have low vision); Expressions Australia (formerly VicDeaf, covering the deaf and hard of hearing); Scope (complex intellectual, physical and multiple disabilities); AMAZE (autism); Cerebral Palsy Support Network mobility/physical disability, Kew Neighbourhood Learning Centre and the individuals with disability who kindly shared their time and lived experience.

Deb Ganderton
CEO

Michael Doery
Trust Chair



Introduction

The Disability Access and Inclusion Plan (DAIP) is a strategic plan by which the Greater Metropolitan Cemeteries Trust (GMCT) will develop and implement actions to inform the future design of facilities, services and programs. We aim to provide equitable and dignified access to all people.

As industry leaders it is our responsibility to promote community engagement by ensuring our facilities and culture are welcoming and supportive. We are in an exciting period of transformation at GMCT. Part of our growth as an organisation is to be at the forefront of the cemetery sector in terms of disability support. We aim to foster an inclusive approach to physical access, customer service and access to information, and to promote policies of physical and social inclusion.

We acknowledge that widespread social, physical and cultural barriers may have a real and negative impact on people with disability. Simple approaches based on equal access will not always work, therefore we need to take additional steps to ensure people with a disability and their families, friends and carers can participate in GMCT's full range of services and events.

Our DAIP exists to ensure we turn a critical and strategic eye to what we are doing to reduce barriers, promote inclusion, change attitudes and practices and improve outcomes for people with disability.

Who will the DAIP support?

One in five Victorians has a disability. Disability access is often equated with physical access and is often linked to a person using a mobility aid such as a wheelchair. While providing basic physical access is important because it also benefits other people with mobility restrictions including older people, parents with prams or strollers and people with temporary injuries, access needs are as diverse as the people who make up our community. We are also aware that prevalence of disability increases with age.

Older people and people with disability can experience temporary or permanent loss or impairment to:

- Sight
- Hearing
- Motor ability and balance
- Dexterity or strength
- Communication
- Mental functioning and cognition

Some disabilities are less evident than those linked to physical access, for example hearing loss or an acquired brain injury. It is estimated that one in four people with disability comes from a non-English speaking background, which can increase or create additional barriers.

With our ageing and increasingly diverse community, it is important that we ensure our actions, decisions and initiatives align with current and emerging community expectations, not only in relation to burial, cremation and memorial needs but also the broader cemetery sector and public open spaces.

How this plan was developed

In 2018, the Community Advisory Committee requested that GMCT develop a Disability Access and Inclusion Plan (DAIP) to prepare the organisation for a future with an ageing population and subsequent increase in the prevalence of disability. With a planned approach and ongoing improvement, GMCT will showcase leadership in disability inclusion, help reduce discrimination and respect everyone's human right to be included equitably in our community.

In 2019, a working group of internal and external stakeholders was established to provide expert advice in the plan's development. The working group provided valuable input by sharing their observations of the barriers encountered by older people and people with disability when accessing GMCT sites and services. They helped identify opportunities to improve outcomes for people with disability, developed strategies for the plan and reviewed drafts of the DAIP.

Site access appraisals were carried out to identify barriers and opportunities for improvement. A review of relevant legislation, GMCT documents and practices was also carried out. Extensive consultation was undertaken. Surveys were carried out with internal GMCT staff, external stakeholders (such as funeral directors) and customers/community members. Workshops were held at each regional office for all GMCT staff to participate.

The staff workshops provided valuable GMCT-specific information and first-hand experiences, not just about cemetery visitors with disability, but also from staff with disability and those who are family or carers of people with disability. GMCT chapels and reception areas were found to provide excellent disability access on the whole.

A key environmental factor that was identified was the pedestrian paths to and between graves which contain challenges for mobility in terms of surfaces, materials and obstacles that GMCT does not always have the authority to change. The nature of grassed gravesites and memorial grounds present inherent obstacles to access, which are difficult to address. However, issues surrounding way-finding and many other pedestrian pathways into and throughout the grounds can and will be more readily addressed.

Peak disability organisations were consulted, representing people who are blind or have low vision; are deaf or hard of hearing; have autism, intellectual disabilities or sensory issues; and those with mobility, physical and multiple disabilities. These experts identified many opportunities for GMCT to increase access and inclusion, especially through the use of the latest communication technologies.

Individuals with the specific disabilities were also asked to review GMCT access and information: a female wheelchair user, a young man with cerebral palsy, a deaf (signing) woman, a blind man and a young woman with Down syndrome. These first-hand insights were extremely valuable, not only in identifying barriers for people with a range of disabilities, but also opportunities for improvement.

From this wealth of collected information, key principles and focus areas were identified. Specific goals, strategies and actions for the DAIP were developed through a series of workshops. Finally, feedback on the draft was sought from GMCT staff and stakeholders before the DAIP was finalised.

The staff workshops provided invaluable GMCT-specific information and first-hand experiences, not just about cemetery visitors with disability, but also from staff with disability and those who are family or carers of people with disability. GMCT chapels and reception areas were found to provide excellent disability access on the whole.



GMCT environments

The DAIP is a strategic plan that covers all of GMCT's environments:

Built/Infrastructure

Buildings, roads, facilities

Natural

Parks and open space

Social

Information, participation, inclusion

Cultural

Workplace, heritage

The Greater Metropolitan Cemeteries Trust oversees 21 cemeteries, memorial parks and greenfield sites spanning more than 600 hectares of open public space alongside 127 separate buildings and 60 kilometres of roads. We are committed to caring for these reflective and peaceful places in perpetuity to preserve and protect the memories and history they hold.

We are duty bound to identify and protect any important heritage features across all our cemeteries and memorial parks and we regularly review our conservation management plans. To further strengthen our commitment to managing the memorial parks that hold special significance to our communities, GMCT will continue to work closely with and support the many friends groups across our regions.

GMCT currently employs around 228 staff, who tirelessly work to enhance the customer experience of over 1.8 million visitors annually. Our belief in caring for the community with dignity and kindness underpins our work at the Greater Metropolitan Cemeteries Trust. With utmost compassion and respect, we provide funeral services for more than 12,000 families of all cultures and faiths each year.

We understand the unique and personal connections our cemeteries and memorial parks hold for the families and friends of those who are laid to rest. We also believe that working with our communities has many mutual benefits. We value these community connections and will continue to strengthen them by promoting the DAIP through community networks.



Legislative and policy context

Under federal and Victorian legislation it is against the law to discriminate on the grounds of disability. The federal *Disability Discrimination Act 1992* (DDA) requires that equitable, dignified access must be provided to premises including buildings, outdoor spaces and facilities. The *Victorian Equal Opportunity Act 2010* includes a positive duty for organisations to eliminate discrimination, and a specific duty to provide reasonable adjustments for people with disability in employment and when providing goods and services. Throughout this plan federal legislation takes precedence over state legislation.

The Building Code of Australia (BCA) requires compliance with a range of access provisions in buildings. The Premises Standards 2010 are the minimum legislated requirement for new buildings and buildings undergoing significant upgrades in Australia. However, it is a fact that many older buildings and infrastructure do not meet these standards. Best practice in disability access would be to upgrade facilities to comply with the Premises Standards across all GMCT buildings, old and new, where possible. This is not always feasible due to topography, existing infrastructure, resources and heritage constraints.

GMCT is also bound by the *Cemeteries and Crematoria Act 2003*, which contains constraints that apply to memorial structures. In fact, the vast majority of structures and physical obstacles within cemeteries are not designed or owned by GMCT. GMCT must also follow the permit process and conditions applied to memorial permits. Therefore, we will give priority to providing safe disability access to facilities or places that can be modified, experience high

volumes of pedestrian traffic, or are identified as potentially dangerous for people with disability.

A suite of additional Australian Standards and guidelines cover a wide range of design requirements and recommendations for improving disability access and mobility, including streetscapes, off-street parking, public outdoor areas, fixtures, fittings and furniture, tactile ground surface indicators (TGSIs) for people who are blind or have low vision, and communication systems for the deaf or hard of hearing. The Web Content Accessibility Guidelines (WCAG) 2.1 cover a range of recommendations for making Web content more accessible to people with wide range of disabilities.

In addition to providing access to buildings, facilities and information, it is also important for GMCT to promote inclusion, participation and employment of people with disability. For a long time, many people with disability were left out of community life because of negative attitudes or assumptions. Addressing this in the DAIP enables GMCT to promote people's rights under the United Nations Convention on the Rights of People with Disabilities, the *Australian Human Rights Commission Act* and the Victorian Charter of Human Rights and Responsibilities.

Finally, the DAIP aligns with GMCT's Annual and Strategic Plan, especially contributing to the strategic priority of 'Community Connections' – in particular, "Deliver our community connections strategy incorporating consumer insights, diversity and accessibility, and building strong community ties to support customer confidence in GMCT."



Vision for the DAIP

An accessible and inclusive GMCT where people with disability are able to access our cemeteries and participate fully in all our activities and services.

Principles

There are six principles that underpin the DAIP. These principles are all equally important and are interconnected. This means we need to consider all of the principles at the same time, not separately, when implementing the plan.

Principles for the plan's implementation were developed through the consultation process. They recognise federal and Victorian laws, and the values of inclusion and diversity.

These principles are:

Design for the entire community

GMCT's built environment and digital presence will be designed to meet the needs of all people who wish to use it. If these spaces are more accessible, widely usable, convenient and a pleasure to use, then everyone benefits.

Continuous improvement

We will overcome barriers to access and inclusion with a commitment to ongoing effort to improve, using the very latest knowledge, tools and technology.

Equitable and inclusive approach

We will prevent the marginalisation of any person, regardless of ability, through planning and action dictated by reason, conscience and a natural sense of what is fair to all.

Cultural inclusion

We will promote spaces that enhance mutual respect, effective relationships, clear communication, shared learning, explicit understandings about expectations and critical self reflection. This will encompass the history, heritage and diversity of our communities, and individuals' interests and beliefs.

A human-centric culture

We will create a safe space supported by training and awareness, where we continually reflect on our customers' and communities' needs as people, including GMCT staff.

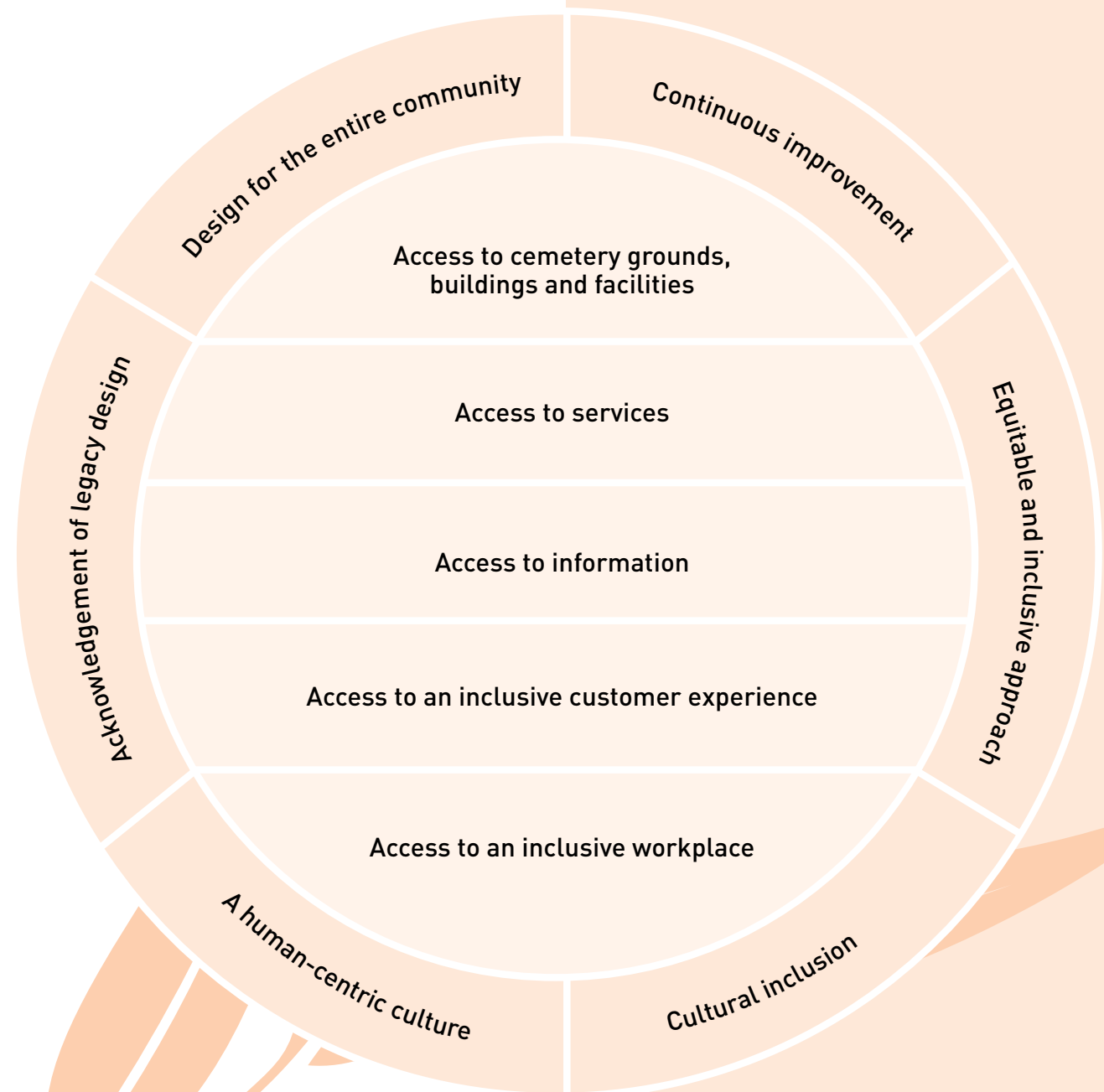
Acknowledgement of legacy design

We understand that rectification of some of our older cemeteries and assets will be limited due to overarching constraints such as design or construction practices of the past. However, we will strive to ensure that rectification works are planned to enhance accessibility where possible.

Focus areas for action

GMCT leadership and staff are committed to ensuring that all aspects of the service we run are accessible to the whole community by removing or reducing any physical or attitudinal barriers where possible.

We are committed to working towards the desired access and inclusion outcomes in this DAIP and have identified **five focus areas for action**, which contain specific strategies and actions for improvement. The action plan is an internal GMCT document.



Outcomes framework

We will use the following outcomes framework to monitor our progress on the DAIP. Achievements and milestones related to the DAIP will be reported in the Annual Report.

Vision	Focus areas	Outcomes
An accessible and inclusive GMCT where people with disability are able to access our cemeteries and participate fully in all our activities and services.	<p>1 Access to cemetery grounds, buildings and facilities People with disability have the same opportunities as the rest of the community to access the grounds, buildings and other facilities administered by GMCT.</p> <p>2 Access to services People with disability have the same opportunities as the rest of the community to access the services and events organised by GMCT.</p> <p>3 Access to information People with disability receive information from GMCT in a format that will enable them to access the information as readily as the rest of community.</p> <p>4 Access to an inclusive customer experience People with disability receive the same level and quality of service from the staff of GMCT as the rest of the community.</p> <p>5 Access to an inclusive workplace People with disability have the same opportunities to obtain and maintain employment with GMCT as the rest of community.</p>	<p>Accessibility – the built and natural environment is accessible to people with disability.</p> <p>Inclusion – GMCT’s community and places are welcoming and inclusive for people with a disability.</p> <p>Mobility – people with disability are able to move around and get to the places they want to go.</p> <p>Safety – people with disability feel safe, secure and protected.</p> <p>Respect – people with a disability are as recognised and respected as any other person.</p> <p>Opportunity – people with a disability have equal opportunities to any other people.</p> <p>Education and skills – people with a disability actively engage and succeed in learning and skill development.</p> <p>Employment – people with a disability are engaged in flexible and sustainable employment and have opportunities to develop and succeed.</p> <p>Accountability – The DAIP will have measurable outcomes.</p> <p>Attitudes – The DAIP is driven from the top, with respect for all people and heritage at its core.</p> <p>Connection – people with a disability are active participants in the GMCT community.</p> <p>Culture – The DAIP will contribute to GMCT’s culture of best practice, inclusivity and innovation.</p>

GMCT will strive to achieve the DAIP vision by supporting and delivering these outcomes.

As part of this process:

- The DAIP will be published in accessible formats on the GMCT website and will follow accessibility guidelines.
- GMCT will lodge the DAIP with the Australian Human Rights Commission.

Some indicators already exist for these outcomes. Others will need to be adapted and, in some cases, new indicators will need to be developed.

- During 2020, GMCT will work in partnership with key stakeholders to develop relevant indicators and measures for each outcome.

Monitoring and evaluation

Accountability lies at many levels. We accept our responsibility and look to the community, business and other bodies to support our vision. GMCT will provide regular feedback on the progress of the DAIP and seek hard evidence that there are positive changes as a result of the plan.

- The DAIP will be integrated into business planning and reporting frameworks.
- We will utilise GMCT’s Community Advisory Committee to provide guidance on actions and achievements linked to the delivery of the DAIP.
- We will report progress made in the GMCT Annual Report.
- An internal desktop review of the plan will occur every two years, with a full review commencing after four years, including preparation of the following five year plan.



Kew Neighbourhood Learning Centre partnership

– A flagship program

GMCT is developing an innovative horticulture program for young people with disabilities in partnership with Kew Neighbourhood Learning Centre (Kew NLC). The organisations have formed a partnership, formalised in a Memorandum of Understanding, to collaborate on a Horticulture Learning Development Program that aims to transform both the landscape and participants lives.



The aim of the partnership is to develop the Horticulture Learning Development Program as an example to inspire organisations to work collaboratively to achieve education, training and employment pathways for young people with a disability.

GMCT is providing infrastructure for the program on suitable sites, starting at Northcote Cemetery, for students to undertake basic horticultural practices. GMCT staff are involved in the program, supporting Kew NLC tutors demonstrating specialist horticulture skills and work place processes. Kew NLC is providing pre-accredited training delivered via blended learning, as a pathway for students to access further education and employment.

Through ongoing support of the program, GMCT has committed to:

- Maintain a strong partnership and shared vision for the Program with Kew NLC.
- Provide the infrastructure and resources on sites to support the horticulture project.
- Support staff involvement in the program from across the organisation with a Program Liaison representative.
- Advocate for and promote the Program internally and externally through GMCT Communication services (i.e. newsletter, social media, and community engagement activities).



Glossary

Disability

A disability is any continuing condition that restricts everyday activities. This includes people who have temporary or permanent disabilities: physical, intellectual, sensory, neurological, learning and psychosocial disabilities, chronic diseases or illnesses, physical disfigurement, medical conditions and work-related injuries.

Access

Accessibility as used here refers to the design of products, devices, services, or environments to be usable by people with disabilities. Under the *Equal Opportunity Act 2010* (Vic) it is against the law for public places, facilities, services and information to be inaccessible to people with disability. People with disability should be able to enter every area and facility open to the public and make use of public places if a person without disability can do so.

Inclusion

Social inclusion is about people being able to participate in society, free from discrimination and disadvantage. It is the process whereby every person (irrespective of age, disability, gender, religion, sexual preference or nationality) who wishes to can access and participate fully in all aspects of an activity or service in the same way as any other member of the community. Inclusion is about creating conditions for equal opportunities for all.

Barriers to access and inclusion

People with disability face multiple barriers to meaningful participation in community. GMCT hope to address some of these as they relate to our cemeteries and memorial parks through this DAIP.

Universal design

The seven principles of universal design were developed in 1997 by a working group of architects, product designers, engineers and environmental design researchers, to describe the concept of designing all products and the built environment to be usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life.

Wayfinding

'Wayfinding' encompasses all the ways in which people orient themselves in physical space and navigate from place to place. In designing infrastructure, it refers to information systems that guide people through a physical environment and enhance their understanding of the space. This includes directional signage and informational signage, as well as other infrastructure such as landmarks.

Continuous accessible paths of travel (CAPTs)

A continuous accessible path of travel is defined as an uninterrupted route to, or within, premises or a building, which provides access to all services and facilities.

TGSIs

Tactile ground surface indicators (TGSIs) are used to aid navigation of the urban environment for pedestrians who are blind or have low vision. TGSIs warn people that they are approaching a hazardous situation such as a road, a set of stairs, a ramp or an obstruction that they might injure themselves on. TGSIs are designed to be read either by feeling underfoot, through the tip of a long cane, or visually because of luminance contrast – meaning the colour of the TGSIs stands out compared to the surrounding floor or ground surface.

Hearing loop

A hearing loop (sometimes called an audio induction loop) is a special type of sound system for use by people with hearing aids. A hearing loop cuts out unwanted background noise. The sound goes directly into the hearing aid. It is inconspicuous, cost-effective and any number of users can use the system. Hearing loops can be built-in at a venue or facility (e.g. chapel or reception counter). Portable personal systems are also available for loan or hire to people who are hard of hearing where no in-built system exists.

References

AUSLAN

AUSLAN is short for Australian sign language, the language of the Australian deaf community. It is a visual form of communication that uses hand, arm and body movements to convey meaning. Deaf people use AUSLAN interpreters for work, education, medical appointments, and to access leisure and personal pursuits. Deaf Australia recommends NAATI-qualified interpreters are used for all interpreting assignments.

Carers

A carer is someone who provides unpaid care and support to family members or friends who have a disability, mental illness, chronic condition or terminal illness, and the elderly. It is estimated that one in ten people in the workforce are also carers, combining paid work with an unpaid caring role. As Australia's population ages, there is pressure to increase both our labour supply and our carer supply. Supporting carers in the workforce has consequently become not just a social imperative but an economic one.

Reasonable adjustments

Reasonable adjustments are changes to the work environment that allow people with disability to work safely and productively. Under the *Equal Opportunity Act 2010* employers are required to make reasonable adjustments for a person with disability who:

- applies for a job, is offered employment, or is an employee, and
- requires the adjustments in order to participate in the recruitment process or perform the genuine and reasonable requirements of the job.

Many employees with disability do not need any workplace adjustments. Some need only minor changes (e.g. to work hours or performance requirements) while others may require specific equipment or modifications to the workplace.

Employers can apply for funding through the Workplace Modifications Scheme (an Australian Government fund) to help cover the cost of accommodating workers with disability.

Relevant Legislation, Standards and Guidelines

- *Cemeteries and Crematoria Act 2003*
- *Disability Discrimination Act (DDA) 1992*
- National Disability Strategy 2010-2020
- Victorian State Disability Plan 2017-2020
- *Victorian Equal Opportunity Act 2010*
- Victorian Charter of Human Rights and Responsibilities
- *Carers Recognition Act* (Cwlth 2010) (Vic 2012)
- Building Code of Australia (BCA)
- Disability (Access to Premises – Buildings) Standards 2010 (the Premises Standards)
- Australian Standard (AS 1428)
- Australian Human Rights Commission (AHRC) Advisory Note on streetscape, public outdoor areas, fixtures, fittings and furniture 2013
- Web Content Accessibility Guidelines (WCAG) 2.1

Greater Metropolitan Cemeteries Trust (GMCT) relevant policies and strategic documents

- GMCT Annual Report & GMCT Strategic Plan
- Community Engagement Policy
- Recruitment and Selection Policy
- GMCT Learning and Development Policy
- Employee Onboarding Policy
- GMCT Antidiscrimination and EEO Policy
- GMCT Community Connections Framework

For more information please contact GMCT at:

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Use the National Relay Service (NRS)

We are NRS and VRS (Video Relay Service) friendly. If you are Deaf, hard of hearing or have a speech impairment, you can call the Greater Metropolitan Cemeteries Trust through the NRS or VRS.

Speak and Listen (speech-to-speech) users phone NRS on **1300 555 727** then ask for 1300 022 298.

For SMS relay, use **0423 677 767** and ask for your message to be relayed to 1300 022 298.

Internet Relay users can connect to NRS on the **Make an Internet Relay** call page then use this number 1300 022 298.

Video Relay users can connect to NRS and use this number: 1300 022 298.

For instructions, visit the **Make a Video Relay** call page.

For Captioned Relay calls, visit the **Make a Captioned Relay** call page and use this number 1300 022 298.

For more help you can email the **NRS Helpdesk** or call **1800 555 660**.

