



2006 Disability Action Plan Review Report.

September 2012.

Introduction

The Disability Action Plan was launched in December 1999. The plan aims to remove barriers to access for customers, potential customers and staff and was developed to be consistent with Optus' values and corporate policies such as Equal Employment Opportunity and Occupational Health and Safety.

The key objectives of the Plan are:

- Corporate Culture
- Accessible Communications
- Confidentiality
- Physical Environment
- Products and Services

Since 1999, Optus has undertaken periodic reviews of its Plan to ensure ongoing compliance and commitment to minimising and, where possible, eliminating discrimination, particularly focusing on issues surrounding accessibility. Details of these reviews are available at optus.com.au/disability.

This is Optus' fifth review report of its Disability Action Plan.

Scope

As part of the Optus Disability Action Plan 2006, Optus has committed to monitoring and evaluation of the Plan. Optus operates in an environment of dynamic change in technology, the availability of new products and services and consumer expectations. Monitoring is considered critical to the ongoing relevance of the Plan.

The following performance indicators will be used to assess the effectiveness of the Plan:

- **Performance Indicator 1:** Low percentage of customer complaints/staff grievances relating to disability matters
- **Performance Indicator 2:** Continued positive feedback from disability stakeholders with regards to Optus' initiatives for people with disabilities.

Evaluation of the Plan against these performance indicators have been measured in this report over the past five years as agreed in the 2006 Disability Action Plan.

Implementation and Governance

Actions

1. Corporate Culture

To achieve a responsive anti-discriminatory culture

Action	Performance Measurement	Status
<p>1.1 Internal Communications</p>	<p>Continued maintenance of Optus' internal staff website which details regulatory and policy issues, equipment options and customer service processes to ensure awareness of those matters impacting on customers with disabilities.</p> <p>Complaints regarding disability discrimination are handled by existing HR processes as part of above policies.</p>	<p>Ongoing.</p> <p>Compliance met.</p>
<p>1.2 Employee Training</p> <p>> EEO Training.</p> <p>> Disability Awareness.</p>	<p>All Optus employees are required to complete an online compliance training module on Equal Opportunity as part of their induction and refresh this training every two years.</p> <p>Optus also has an Anti-Discrimination and Harassment Policy which all employees are aware of and have access to via training modules and intranet sites.</p> <p>Continuation of customer service processes for handling disability related enquiries and escalation to a specialist disability customer service team.</p> <p>Training for new customer facing employees and refresher training for existing employees.</p>	<p>Training programmes are in place online and available for all staff. Optus processes include sending reminder notices to staff for relevant compulsory compliance training requirements.</p> <p>Training on processes for Optus' Disability Equipment Program is included as part of Customer Care product training.</p> <p>Reports from the Optus' disability working group suggest that the process is not consistently adhered to. A review has been conducted to examine the effectiveness of current policy to training all staff in Optus' DEP. As a result an ongoing process has been put in place to provide regular quarterly reminders to Customer Care staff about Optus' services for people with disabilities.</p>
<p>1.3 Employer Responsibility</p> <p>> Amendment of Optus' Anti-Discrimination/Harassment/ Bullying Policy.</p> <p>> EEO and OH&S Procedures.</p>	<p>Optus remains committed to an environment free of harassment and discrimination. To that end, the current Anti-Discrimination/ Harassment/ Bullying Policy has been reviewed and amended. Feedback on the proposed amendments was sought from the members of the Consumer Liaison Forum in 2010.</p> <p>EEO and OH&S policies are regularly monitored to ensure that they are maintained to remove barriers to access for people with disabilities.</p>	<p>Compliance met.</p>

Action	Performance Measurement	Status
<p>1.4 Community Focus</p> <p>> Introduction of Optus' Workplace Giving Program. This program enables Optus people to actively contribute to and build strong relationships with community organisations.</p> <p>> Community Grants</p> <p>In 2008, Optus established its Grants Program 'yes' Optus Community Grants. To define community investment focus areas of building social inclusion and supporting disengaged youth, Optus has highlighted three priority areas where it believe as a leading telecommunications company it can make the most difference in the community.</p> <p>Building Social Inclusion:</p> <ul style="list-style-type: none"> • By providing access to communications for individuals or groups that are currently excluded is one way that Optus can make a significant contribution to society and help overcome the barriers of distance and disadvantage; • By connecting disengaged communities supporting local community organisations and groups' initiatives that help build and strengthen their capacity to deliver services that have a positive social impact for Australians in need; • Supporting disengaged youth by improving their education, life skills and knowledge is key to changing their future and helping them to reach their full potential in life. Creating new educational opportunities will also help in providing more employment opportunities which benefits the local economy. <p>Many of the community groups that have applied have directly benefitted people with a disability.</p>	<p>The Program provides Optus employees with the opportunity to make donations, through regular payroll deductions, to a selected community organisation chosen from a list of thirteen charities (as of 2011) charities. Optus matches dollar for dollar staff donations made through payroll giving. This list currently includes Assistance Dogs Australia.</p> <p>2008 recipient list:</p> <ul style="list-style-type: none"> • Marymead Child and Family Centre; • North Ryde Community Aid and Information Centre; • Stewart House Preventorium; • Jobsupport Inc.; • Barnardos Australia; • The Shack Youth Outreach; • Urban Arts Base – WAYS Youth Services; • Youth Off The Streets; • YWCA of Darwin Inc.; • Youth Enterprise Trust; • Evolve at Typo Station Inc.; • Rural Housing Network; • Upper Murray Family Care – Interchange Program; • Centacare Catholic Family Services; • Interchange Central Gippsland Inc.; • Youth Focus Inc.; • Palmerston Association Inc.; • The Youth Junction Inc.; • Essere Living Skills Inc.; • Community First Step; • Type 1 Diabetes Network Inc.; • St Kilda PCYC; • St. Vincent de Paul Chelsea. 	<p>Policies are ongoing.</p> <p>2012 applications for the 'yes' Optus Community Grants grant programme have closed and recipients will announced on 1 November 2012.</p>

Action	Performance Measurement	Status
<p>> Community Grants (continued)</p>	<p>2009 recipient list:</p> <ul style="list-style-type: none"> • Activate Australia – Connections project; • Balga Detached Youth Work Project Inc. – Finding my way program. • Berry Street – Girlink – Young Women’s Peer Support Project; • Chester Hill Neighbourhood Centre Inc.; • Cystic Fibrosis Queensland (CFQ) – Online CF Education and Support Service; • Desert 2 Surf Ltd – PhotoVoice Project; • Edmund Rice Camps(SA) Inc – ‘Kids at Risk Camp’; • Foodbank SA – Emergency food relief through school breakfast programmes; • Gunditjmara Aboriginal Cooperative – Kalay Wartee Indigenous mentoring project; • Hear for You – e-mentoring programs for young people with hearing impairment; • Hope Empowered Inc – Project 180; • Horizon Theatre Company Ltd – Edge Street Theatre; • Kids Plus Foundation – Kids Plus therapy program; • Legs on the Wall – Physical theatre for indigenous young people; • Liminal Lines Inc – peer education; • Peter MacCallum Cancer Centre – improving cancer patient care with mobile phones; • Radio Lollipop Western Australia – Connecting children through radio; • Royal Institute for Deaf and Blind Children – Teleschool in-home program; • Sir David Martin Foundation – Creative Youth Initiatives Artworks program; • Stewart House – Children from Taree district visit Stewart House; • The Aboriginal Children’s Service Ltd – Gootha Gathering: pathways, peers and partnership; • Time for Kids Inc – New Directions program; • Victorian Immigrant and Refugee Women’s Coalition – Leadership course for migrant and refugee women; • Vitea Ltd – Champ Camp; • Volunteer Centre of WA – Homeless Connect Perth 2009; • WAYS Youth Services (Urban Arts Base) – Arty Arvos; • Wimmera Uniting Care – Beyond Limits: Short film festival.; • TMCA Victoria Youth & Community Services Inc. – Connecting Men and their families: Digital stories; • Youth Focus Inc – Connect, Change and Celebrate; • Youth off the Streets – MHC Permaculture Garden. 	

Action	Performance Measurement	Status
<p>> Community Grants (continued)</p>	<p>2010 recipient list:</p> <ul style="list-style-type: none"> • Alzheimer’s Australia NSW (AlzNSW) – YO-YO (Youth of Younger Onset) Dementia Project; • Australian League of Immigration Volunteers (ALIV) – Community Program for Refugees; • Autism Spectrum Australia (Aspect) – Aspect Social Club; • Bapcare Ltd – Building Better Networks; Camp For Kids With Disabilities; • Berry Street Victoria Inc. – Gippsland Wilderness Program GWP; • Beyond Disability Inc. – Beyond disability; • Big Brothers Big Sisters (Melbourne) Inc. – The Little Brotherhood; • BoysTown – LinkUPI; • Brotherhood of St Laurence Futures Club – Resource materials; • Cerebral Palsy Support Network – Access All Areas Teenage Social Group; • City Life Inc. – City Life Training Room; • Cystic Fibrosis Victoria (CFV) – ‘Social Connection without Infection’; • Desert2Surf Limited – ‘Through My Eyes’ PhotoVoice Exhibition; • Disability Justice Advocacy Inc. – Board Governance; • Douglas Shire Community Services Association Inc. – CAMP ID; • Embrace Education – Mentoring begins in the Classroom; • Hear For You Limited – Hear For You Mentoring Program; • Kids Who Care Foundation – Young Carers Camp; • Manning Valley Neighbourhood Services Inc. – Circus (for) US; • Nordoff-Robbins Music Therapy – Music Therapy for Disengaged Youth; • Oz GREEN – MyCountry-MyStory; • Parramatta Young Christian Workers – Reach Out: Skills For The Future; • Reach Community Initiatives – Shift Youth Mentoring Program; • Sir David Martin Foundation – Creative Youth Initiatives, Student Support Program; • Somebody’s Daughter Theatre Inc. – Projecting a Future. • Stewart House – Children from Broken Hill area visit Stewart House; • Australian Children’s Music Foundation – ACMF Youth at Risk Music Program; • The Children’s Hospital at Westmead – Back on Track Bringing the Classroom to the Patient; • The Exodus Foundation – Youth Education Development; • Wesley Mission Victoria – Re-connecting Young People in Out of Home Care; • Wunan Foundation Inc. – Beat to Education Connected. 	

Action	Performance Measurement	Status
<p>> Community Grants (continued)</p>	<p>2011 recipient list:</p> <ul style="list-style-type: none"> • Aboriginal Literacy Foundation Inc. – Resourcing the ALF Literacy and Tutoring Centre; • African Community Council of the NT (ACCONT) Inc. – African Community Digital Conect Project; • Armadale, Gosnells & Districts Youth Resources Inc. – The Stamping Ground “Connex”; • Australian Children’s Music Foundation – Youth at Risk Music Programme; • Berry Street Victoria Inc – Breakfast Connect; • BoysTown – Parent Connect; • CareerTrackers Indigenous Internship Program – Online Student Portal; • Cobaw Community Health Ltd – Youth Spaces Connecting Young People; • Community Connections (Vic) Ltd – Kids Connect; • Community Services Tablelands Inc. – YouthStop mobile support programme; • Croxton Special School – Adapted Multi Ball Sports; • Giant Steps – Connecting and Comprehending the Social World; • Housing Resource and Support Service Inc – “In my home” website for young adults with disabilities and their families; • KIDS Foundation – It takes two to TANGO (Together Achieving New Goals & Opportunities); • La Trobe Lifeskills Recreation & Work – Surfing the Gap; • Louise House, St Vincent de Paul Society – Homework Support Programme; • Maryborough Special School – Sensory Totems Walking Path; • Melbourne Aboriginal Youth Sport and Recreation (MAYSAR) Ltd – Myths and Legends community arts project; • National Association for Prevention of Child Abuse & Neglect – Bay Islands PhotoVoice; • Salvation Army (TSA – Waterloo Community Ministries) – Creative Communities Cafe; • St George Community Housing Ltd (SGCH) – Digital Connect Scheme; • SydWest Aged Care Disability and Refugee Support – Refugee Students Support; • Tasmanian Regional Arts Inc. – Paste your Face portrait project; • Technical Aid to the Disabled (ACT) Incorporated – Freedom Wheel Bikes; • The Salvation Army Women’s Refuge – Carinya Cottage: Get Connected; • The Youth Junction Incorporated – The Homework Zone; • Uniting Aged Care Victoria & Tasmania (UACVT: Central Region) – Electronic Communication Service for Older Adults; • Vision Equity Life Centres as trustee for Friends Of Autism – FOA 2012 Summer Hoildays Programme; • Volunteering WA – Homeless Connect Perth; • West Coast Youth and Community Support Incorporated – Youth Homework Hub; • Yipirinya School Inc – the Yipirinya Smart Objective. 	

2. Accessible communications

To improve accessibility to information about Optus, its products and services for people with disabilities who may be:

- Customers;
- Employees; or
- Members of the general public who communicate with the company.

Action	Performance Measurement	Status
<p>2.1 Internal Processes on programmes for customers who have a disability</p>	<p>Internal procedures are posted on Optus' intranet for customer facing staff to access, advising them of steps required to answer questions regarding Optus' Disability Equipment Program and other services.</p> <p>Feedback from Optus' Disability Sub-working Group indicates that some customers with disabilities are experiencing difficulties in receiving consistent responses from Customer Care staff on the Optus DEP.</p>	<p>In 2011, Optus conducted a review to the structure of its customer service teams with a view to improving awareness and extending knowledge of what customers with disabilities need.</p> <p>Layout of process documents have been improved and notices will be sent to Customer Care staff on a quarterly basis to continue increasing awareness.</p>
<p>2.2 Website Accessibility</p> <p>> Restructure of Optus website.</p>	<p>Action has been taken to improve the accessibility of our websites against the Web Accessibility guidelines version 2 and more updates are planned to cover all sites. For example, we have a large web infrastructure project currently underway that will include ensuring all websites, including OCA and Optus Zoo, are WC3 compatible. As a result of this complaint Optus has also changed its processes to ensure all new websites and microsites are WC3 compatible.</p> <p>Optus undertook a restructure to its 'accessibility' pages on optus.com.au, including the introduction of a button on the footer of the home page in 2008 which reduced the number of clicks for people to access information about our Disability Equipment Programme.</p> <p>All matters related to disability information can be found under the Corporate Responsibility site under 'Our Customers & Society'. The new website meets Website Content Accessibility Guidelines.</p>	<p>An extensive program is underway to redesign all Optus websites and ensure all sites under this programme are compatible with the Guidelines. This process is still progressing.</p> <p>Completed.</p>
<p>2.3 Billing Formats</p> <p>> Online Billing.</p> <p>> TTY Customer Service.</p>	<p>In November 2004, Optus developed the functionality to produce bills in large font. Large font bills are available to customers who are vision impaired and have an Optus Mobile or Optus Local Telephony on the cabled network.</p> <p>Braille Bills have been available since May 2001.</p> <p>Online billing continues to be available for Mobile and broadband customers.</p> <p>TTY Customer Service numbers continue to be included on all bills and all relevant customer collateral.</p>	<p>Availability of large print and Braille bills continues.</p> <p>Compliance met.</p> <p>Compliance met. Program continues.</p>
<p>2.4 Downloadable files in alternate formats</p>	<p>Files that can be downloaded from the website are available in alternate formats i.e. word, PDF, on Optus 'Disability Service' web pages.</p> <p>Downloadable files in alternative formats are not yet available from other Optus web pages.</p>	<p>Ongoing.</p>

Action	Performance Measurement	Status
<p>2.5 Adequacy of Third Party Access (TPA)</p>	<p>TPA procedures are regularly reviewed to ensure Third Party Access remains adequate while protecting customers from illegitimate access.</p>	<p>Compliance met.</p>
<p>2.6 Industry Consumer Codes</p> <p>> Compliance with Communications Alliance consumer code requirements continues to be a key focus in order to meet this objective for disability related provisions, which have regard to information provision.</p>	<p>Optus is currently a signatory to the following ACIF Consumer Codes:</p> <ul style="list-style-type: none"> • Complaint Handling; • Credit Management; • Calling Number Display; • Telecommunications Consumer Protections. <p>The Telecommunications Consumer Protection Code was registered with the ACMA in 2007. Optus has been significantly involved in reviewing the new version registered with the ACMA in 2012.</p> <p>Optus conducted a compliance review for both the 2007 and 2012 versions of the Code, including examining its processes related to assisting its customers with disabilities.</p>	<p>Ongoing.</p>

3. Confidentiality

To ensure that privacy and confidentiality is maintained in the handling of customer and employee personal information.

Action	Performance Measurement	Status
<p>3.1 Complaint Monitoring</p> <p>> Optus continues to measure its complaint handling reporting only on the information provided directly by the customer.</p>	<p>'Disability' complaints are classified as those that have been escalated to the Optus Customer Relations Group, where customers identified having a disability and that this has had a direct bearing to the complaint itself.</p>	<p>Compliance met.</p>

4. Physical environment

To ensure that Optus' physical environment is as free as possible from impediments or barriers which unduly constrain the access of people with disabilities and hinder their safety.

Action	Performance Measurement	Status
<p>4.1 Physical Optus Environment</p> <p>> In Optus' move to the OCS campus in Sydney and 271 Collins St in Melbourne an access friendly environment was developed.</p>	<p>The building designers for the new Optus campus at North Ryde have utilised the Facility Assessment checklist when capturing design requirements. This checklist included disability provisions such as ramp access to buildings, some sensor doors and Braille signs for amenities.</p> <p>Regulatory and Corporate Affairs provided a significant amount of information and feedback on the proposed building requirements to ensure disability standards are met.</p>	<p>Ongoing compliance and discussion with staff.</p>
<p>Wheelchair accessibility to Optus World stores.</p>	<p>Included in Optus policy as required facility for all new store layouts where infrastructure is required.</p>	<p>Compliance met.</p>

5. Products and Services

To enhance access to Optus products and services.

Action	Performance Measurement	Status
<p>5.1 Disability Equipment Program</p> <ul style="list-style-type: none"> > Optus' Disability Equipment Program. > Equipment offerings for Optus' Local Access Resale customer base. 	<p>Optus launched its Disability Equipment Program (DEP) after a 'soft launch' of TTY equipment 2001 and successful trials of volume control handsets. This programme has continued.</p> <p>Two models of TTY equipment are available as part of Optus' DEP – the Uniphone 1150 and the Superprint 4425.</p> <p>The Doro312C was been added as a handset featuring big buttons. This has been more recently replaced with the Uniden DECT SSE25.</p> <p>All handsets are compatible with Optus' fixed line networks and VOIP.</p> <p>In June 2004, Optus successfully negotiated an arrangement with Telstra that enables Optus' Local Access Resale customers to have access to a range of Telstra's disability equipment, provided by Telstra under agreement with Optus. This programme ceased in 2010.</p>	<p>Program continues.</p>
<p>5.2 Mobile equipment for customers with vision impairments</p>	<p>Optus has made available mobile phones that support TALX software where commercial solutions from vendors provided.</p> <p>More recently, with the onset of smart phones including iPhone, accessibility options are increasingly available.</p>	<p>Ongoing</p>
<p>5.3 Product and Service Initiatives</p> <ul style="list-style-type: none"> > SMS Offers. > Calls to the National Relay Service. 	<p>Both prepaid and postpaid mobile pricing plans now include SMS as part of the Plan's rewards. That is, the pricing plans now include cheaper or free SMS in addition to cheaper or free voice calls.</p> <p>In July 2004, calls made to the NRS by our directly connected local telephony customers were re-rated as a standard local call, in line with the customer's selected local call rate. These calls were previously charged at 25¢.</p>	
<p>5.4 Staff Awareness of Program</p>	<p>Information regarding the Disability Equipment Program and available equipment is included on the internal website for customer facing staff.</p>	<p>Ongoing.</p> <p>In 2011, Optus conducted a review to the structure of its customer service teams with a view to improving awareness and extending knowledge of what customers with disabilities need.</p> <p>Layout of process documents have been improved and quarterly notices will be sent to Customer Care staff on a quarterly basis to continue increasing awareness.</p>
<p>5.5 New Design Principles</p>	<p>Optus includes consideration of disability issues in its Regulatory Impact Assessment process for new projects.</p> <p>Optus has also established that WC3 v.2 guidelines should be followed for all new Optus public websites and micro sites.</p>	<p>Ongoing.</p>

Action	Performance Measurement	Status
5.6 Research and Development > SMS 106 emergency calls.	Optus has participated in industry discussions around the development of using SMS 106. Optus participated in supplying SIM cards and data services to test and demonstrate text-over-IP on BlackBerry devices in these industry discussions.	Ongoing.
5.7 Technical options for Pay TV	Optus worked in conjunction with the Australian Subscription, Radio and Television Association (ASTRA) to progress the provision of captions on pay TV services until December 2011 when it ceased to be a member. Optus is currently reviewing its captioning and compliance reporting obligations with regard to its pay TV services under the <i>Broadcasting Services Amendment (Improved Access to Television Services) Act 2012</i> .	

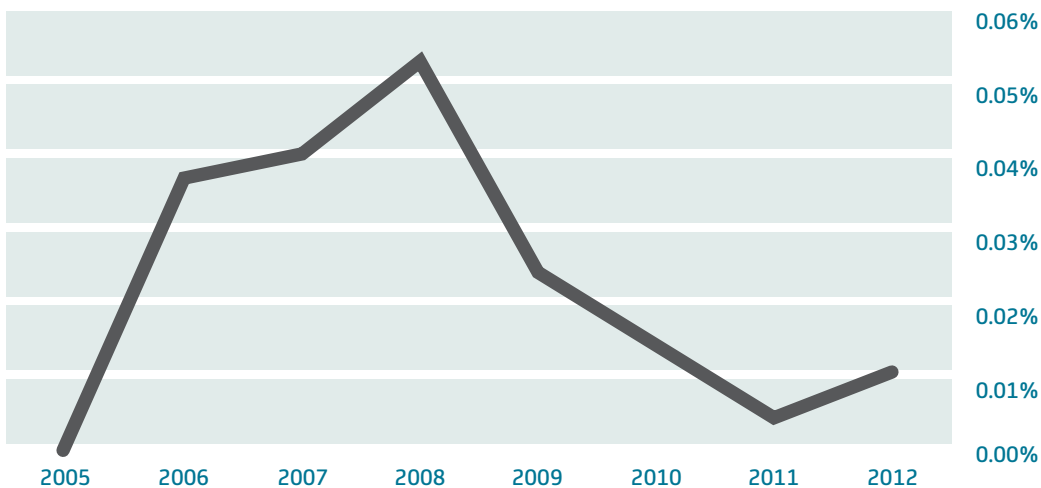
Performance Indicator 1: Low percentage of customer complaints/staff grievances relating to disability matters

Optus has investigated the number of complaints relating to a disability that Optus’ Customer Relations Group has received since 2005. These calls are identified by using the following definition:

“Disability complaints relate to complaints associated with customers who have advised that they suffer from disability that has a direct bearing on the complaint itself. A disability may be physical, cognitive, mental, sensory, emotional, developmental or some combination of these. Any one of these factors have resulted in the complainant’s inability to utilise or be responsible for the use of an Optus service or product.”

Pleasingly, the numbers received are very small and continued to remain a minimal category against Optus’ total escalated complaints.

Complaints relating to disability matters



Performance Indicator 2: Continued positive feedback from disability stakeholders with regards to Optus’ initiatives for people with disabilities.

Optus continues to work with its representatives on the Disability Sub-Working Group under its Consumer Liaison Forum to address issues raised and improve our services for customers with disabilities.