



OPTUS DISABILITY ACTION PLAN

2006

Getting It Right.
Making It Simple.

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SECTION 1 - CONTEXT

INTRODUCTION

Optus is Australia's second largest telecommunications company. With over 9000 employees, Optus has grown rapidly since its establishment in 1992.

As a leader in integrated communications, we are uniquely placed to shape the future of the telecommunications industry. The future of Optus is not just telephony - it's about integrating entertainment and information services, voice and data, mobile and Internet access, wireless and wireline, satellite and cable. It's about one provider offering a complete service to its customers. The future services on offer are expected to provide exciting opportunities for enhanced access for people with disabilities. By enhancing access for people with disabilities, Optus will be enhancing access for all.

Our Aim

The Optus Disability Action Plan aims to remove barriers to access for customers, potential customers and staff.

Our Vision and Values

Providing for the needs of people with disabilities is consistent with Optus' Vision of being a leader in integrated communications, with its core values of:

Challenger Spirit

- Embrace change and challenge the status quo. Continue to break new ground and seek innovative ways to do business. Take calculated risks to meet business goals. Compete fairly and vigorously. Stay resilient even in tough times.

Customer Focus

- Listen to and anticipate our customers' needs. Simplify the customer experience. Treat each customer with dignity and respect. Deliver quality products and services to grow and sustain customer value. Satisfy our customers' needs.

Integrity

- Honour commitments. Take accountability and responsibility for our actions. Treat everyone with dignity, fairness and respect. Conduct business with the highest ethical standards. Act in accordance with our core values.

Personal Excellence

- Achieve results with a high standard of performance. Take personal responsibility and actions for growth and development. Recognise individual potential and contribution. Maintain work and life harmony. Actively seek feedback to improve performance.

Teamwork

- Share information and resources across our teams, business units and companies. Recognise, respect and value diversity in the team. Value the contribution of each member of the team. Encourage open discussion and commit to a shared position. Consider how our actions impact the team and the group.

The Disability Action Plan (the Plan) has been developed having regard to, and consistent with, Optus' Vision and Mission and Corporate Policies such as Equal Employment Opportunities and Occupational Health and Safety.

Our Commitment

In developing and implementing this Plan, Optus affirms its commitment to minimising and, where possible, eliminating discrimination.

This commitment covers all areas of the company's operations, notably:

- provision of products and services;
- employment practices; and
- community interaction / all dealings with the community.

The ongoing nature of this commitment will be reflected in an established process of monitoring and evaluation of the Optus Plan against measurable criteria.

LINKS TO THE DISABILITY DISCRIMINATION ACT AND INDUSTRY PROCESSES

Disability Defined

This Plan uses the definition of disability as included in the *Disability Discrimination Act* (1992) (DDA), as follows:

Disability means

- (a) total or partial loss of the person's bodily or mental functions; or
- (b) total or partial loss of a part of the body; or
- (c) the presence in the body of organisms causing disease or illness; or
- (d) the presence in the body of organisms capable of causing disease or illness; or
- (e) the malfunction, malformation or disfigurement of a part of the person's body; or
- (f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgement or that results in disturbed behaviour; and includes a disability that:
 - (h) presently exists; or
 - (i) previously existed but no longer exists; or
 - (j) may exist in future; or
 - (k) is imputed to a person.

In 1999 the Australian Bureau of Statistics estimated that 3.6 million Australians had a disability, representing 19% of the population. This is predicted to increase steadily as the proportion of the aged in the community increases.

The result for telecommunications companies is an increasing proportion of customers, potential customers and staff who have a disability. In removing barriers for access for people with a disability, benefits for many others are achieved. Hands-free phones, for example, may provide access for people with mobility impairment but also provide benefits for a range of other users.

Examples of the common barriers to access to telecommunications by people with disabilities are as follows:

- being able to lift and hold a receiver
- being able to hear the phone ring
- being able to adjust the volume of the phone according to the tone and volume of the other person's voice
- being able to see the non standard enhanced call handling features on a telephone handset
- accessing a retail premise to purchase a product, service or pay a bill
- accessing advertising information in the media or by mail
- being able to contact the customer service section of the telecommunications company
- being able to access the company's internet sites and services provided over the internet (such as online billing)

The greatest barriers to access to telecommunications arise for people with a hearing impairment or who are severely/profoundly deaf. Additional barriers occur for those with a number of needs.

Disability Action Plans

The DDA provides for the preparation of Disability Action Plans to encourage organisations to eliminate, as far as possible, disability discrimination in a planned way.

To comply with the DDA, the Optus Plan must include provisions relating to:

- (a) the devising of policies and programs to achieve the objects of the DDA; and
- (b) the communication of these policies and programs to persons within Optus; and
- (c) the review of practices within Optus with a view to the identification of any discriminatory practices; and
- (d) the setting of goals and targets, where these may reasonably be determined, against which the success of the Plan in achieving the objects of the DDA may be assessed; and
- (e) the means, other than those referred to in paragraph (d), of evaluating the policies and programs referred to in paragraph (a); and
- (f) the appointment of persons within Optus to implement the provisions referred to in paragraph (a) to (e) (inclusive).

Industry Codes and Standards

Optus actively supports the development of Industry Codes and Technical Standards by the Australian Communications Industry Forum (ACIF) division of Communications Alliance. Communications Alliance has established a Disability Council to ensure the needs of people with disabilities are considered in the development of Codes and Standards.

In identifying compliance with specific ACIF Codes and Standards as a strategy within the Plan, Optus demonstrates its commitment to achieving industry best practice with regards to meeting the needs of people with disabilities.

DEVELOPMENT OF THE PLAN

Consultation

Initial consultation with disability organisations was conducted at a Disability Forum held in February 1998. Representatives from a range of disability organisations were involved in the Forum and provided valuable input into the direction and approach of the Optus Plan. The Optus **Disability Action Plan Working Group** was then formed as part of the broader consumer consultation process provided by the Optus Consumer Liaison Forum (CLF). As participants of this broader consultation process, the Plan Working Group members continue to provide specialist input regarding disability issues in the context of their knowledge of Optus.

The Plan Working Group firstly identified the key issues to be addressed by the Plan and secondly the strategies to address each of these. Consultation with Optus staff members, HREOC and other organisations was used to ensure strategies were achievable and consistent with external benchmarks.

Guiding Principles

The following principles have been identified as guiding the implementation of the Plan:

- In implementing the Plan, Optus will focus on achieving **accessibility**.
- In implementing the Plan's strategies, Optus will strive to achieve **integration** of the needs of people with disabilities with current Optus employment and business objectives.
- In implementing and reviewing the Plan, Optus will commit to a process of **ongoing consultation**.
- Where the retrofitting of current practices/products is inefficient, Optus will adopt a **future focus**.

Monitoring and Evaluation

This Plan is considered an evolving process with regular monitoring and review to be conducted. A review document will be published outlining the completed actions against the objectives of the Plan. This will be available on the Optus web site.

Performance will be monitored and evaluated in two ways:

(i) Implementation of Strategies

The implementation of the Plan will be monitored against the timeframes identified for each strategy. An initial evaluation of progress was conducted in the first 6 months of implementation. This review is to be followed by an annual review (2000), a 2-year review (2002), a 3-year review (2005) and a 5-year review (2010).

(ii) Outcomes of the Plan

The efficacy of the Plan in achieving the Key Outcomes will be assessed against the following **Performance Indicators**:

- 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 against performance indicators will take into consideration the effect of external factors, such as activities of competitors. As a result, a broad analysis will need to be used when assessing Optus' performance against the Plan.

Further details of the timeline for monitoring and evaluation of the Plan are included in Section 3.

SECTION 2 - OBJECTIVES AND STRATEGIES

SUMMARY OF KEY OBJECTIVES

1. Corporate Culture

To achieve a responsive anti-discriminatory culture

Optus' attitude towards people is reflected in its dealings with customers, its employment practices, and in its dealings with the broader community. Such an attitude is the key component of a corporate culture. To achieve a discrimination-free culture, Optus will ensure that its staff at all levels of the company are informed of and feel confident to respond to the needs and expectations of people with disabilities, as they would with any other customer.

The use of representatives from disability organisations is as a key component of the strategies to influence Optus Corporate Culture. This may include, for example, requesting these representatives to develop and deliver components of the internal communications / training program.

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.**

This objective spans a range of interactions between Optus and customers, employees or members of the public. It relates to communication with customers in verbal or written form, or other formats as appropriate. It impacts on advertising, and the portrayal of people with disabilities, as well as calls from the general public to the company on a range of matters.

Communications include commercial documentation, general messages to customers, interviews or presentations.

This objective has two dimensions:

- (a) maximising utilisation of existing methods of communication with people with disabilities, such as via TTY, the web site, etc.
- (b) identifying deficiencies in current means of communication and developing strategies for addressing these.

A key priority of this objective is the provisioning of the website and providing TTY access. Optus will ensure that no additional charges will be incurred for providing information in alternative formats to customers with disabilities.

3. Confidentiality

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

Information is only requested from customers, potential customers and employees that is essential to the business relationship between the customer / employee and Optus.

Optus' information-handling procedures, including use and disclosure of information, have due regard to relevant privacy considerations.

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.

The physical environment encompasses the following areas:

- (i) Optus workplace premises (predominantly buildings in major capital cities of Australia);
- (ii) Optus network sites, including mobile phone base stations and Optus' hybrid fibre-coaxial cable network in urban areas.

In addition, Optus dealers, as well as retailers, whether in the form of Optus World stores or booths within large retail chains, all bear the Optus brand and therefore are viewed by members of the public as "Optus premises". It is recognised that strategies to enhance access to Optus dealers will need to be considered within the operational constraints of current contractual arrangements. It is intended that the needs of people with disabilities be considered for inclusion in future contractual arrangements.

The types of physical access issues which are covered under this objective include -

- (a) access for people with mobility disabilities, including wheelchair access
- (b) appropriate heights of counters etc
- (c) lighting/contrast and signage
- (d) aids to access, such as tactile ground surfaces etc
- (e) lifts (button height, voice information etc)
- (f) access practices such as queuing
- (g) visual and audio cues in queuing facilities

5. Products and Services

To enhance access to Optus products and services.

This objective intends to encompass the following areas of Optus activity:

- product planning and development processes;
- provision of telecommunications services; and
- the purchase of products or services for resale.

The scope of this objective includes the following Optus products and services:

- local and long distance telephony
- mobile telephony
- internet

Consideration of technical issues for Pay TV is being assessed as a separate strategy within this objective.

DISABILITY ACTION PLAN – REGISTER OF CURRENT ITEMS

In order to meet these objectives, Optus has created a Register of Current Items. The purpose of this Register is to capture specific items under review for each stated objective, as well as to track the progress being made on these items. It is intended to be a fluid document that provides the flexibility to add and update work items regularly, not just when the more formal task of reviewing the Disability Action Plan occurs.

The themes and items included on the Register will be determined by consultation between Optus and Optus' Consumer Liaison Forum (CLF) representatives on the Disability Subgroup.

SECTION 3 - MONITORING AND EVALUATION

Monitoring and evaluation is considered critical to the continuing relevance of the Plan in an environment of dynamic change in technology and consumer expectations/uses of telecommunications products and services.

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.

The following strategies and timeline will be used to record achievements, monitor progress, evaluate the effectiveness of the Plan and to review it where needed.

The review documents can be downloaded from www.optus.com.au/disability

STRATEGIES	RESPONSIBILITY	TIMELINE
Establish baseline data for assessing performance indicators.	Regulatory	March 2000 Complete
6 month evaluation <ul style="list-style-type: none"> • To monitor progress of implementation • Results reported to CLF and senior management 	Regulatory The Plan Working Group and internal Optus advisory committee	May 2000 Complete
Review <ul style="list-style-type: none"> • Evaluation of the Plan against performance indicators and review/amendment of the Plan as required • Results reported to CLF, senior management and in Optus' Annual Report 	Regulatory The Plan Working Group and internal Optus advisory committee	1 year (Nov 2000) Complete 2 year (Nov 2002) Complete 3 year (Nov 2005) Complete 5 year (Nov 2010)

SECTION 4 - INQUIRIES/COMPLAINTS

Inquiries or complaints regarding Optus activities in relation to the Plan can be made via the normal customer service channels, as follows:

Telephony / Internet / Pay TV Customer Service

Telephone Access	133 066
TTY Access	1800 500 002

Mobile Customer Service

Telephone Access	1300 300 937
TTY Access	1800 123 124

or can be lodged in writing to:

**Customer Relations Group
Optus
PO Box 306
Salisbury South SA 5106**

Complaints lodged via these services will be managed as with other Optus complaints, in compliance with the ACIF Complaint Handling Code. That is, Optus will attempt to resolve all issues at the first instance with a process of escalation available where required.

Optus' usual internal grievance procedures are available for resolving issues raised by staff with respect to disability related issues. Staff are able to contact their Human Resources Representative for information. Escalation is available as required under legislation.

Further Information

Further information regarding the Optus Plan or copies of the Plan can be obtained by accessing the Optus website at www.optus.com.au/disability or by contacting Optus Customer Service on the telephone numbers above.

Assistance with the provision of the Plan in alternative formats can also be provided by Optus Customer Service.

GLOSSARY

CLF	Consumer Liaison Forum - an annual forum held with representatives from key national consumer organisations to provide input into Optus policies/procedures as they impact upon consumers
DDA	<i>Disability Discrimination Act 1992</i>
EEO	Equal Employment Opportunities
OHS	Occupational Health and Safety
HREOC	Human Rights and Equal Opportunities Commission
TTY	Telephone Typewriter