



Disability Action Plan mid-term review 2014

Optus' Disability Action Plan (DAP) outlines strategies and commitments made by its business units to ensure, in practical ways, that Optus continues to minimise and, where possible, eliminate discrimination.

As stated in the DAP published in 2012 our commitments are considered "an evolving process with regular monitoring and reviews to be conducted on a periodic basis. 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."¹

This review examines those actions that were committed to being addressed within a timeframe either before or by end 2013, or were to be conducted on an ongoing basis. These and the other commitments included in the DAP will be reported on at the end of the DAP period in 2016.

Summary of Key Objectives – target completion date end 2013.

1. Corporate Culture

To achieve a responsive anti-discriminatory culture

| Action | Performance Indicator | Responsibility | Timeframe | Update 2014 |
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| Monitor and review the relevance and currency of disability awareness training for Optus employees in relation to service for customers with a disability, including suggestions for improvements from employee feedback. | All Optus employees to complete an online compliance training module on Equal Opportunity as part of the induction and refresh this training every two years. All new staff to complete Optus' Anti-Discrimination and Harassment Policy training via training modules and intranet sites. | Human Resources. | December 2012. | This action is progressing well with all Optus people completing online training modules in EO which includes disability awareness and DDA updates (New starts plus 2 year refresher). In addition all new Optus people complete the Anti-discrimination and anti-harassment training modules. Monitoring and statistics of completions occur via Optus' Learning Management System. |
| Develop processes to implement | Engagement with community services. | Human Resources. | December 2012. | Optus' Human Resources division has embarked on a |

¹ Optus Disability Action Plan 2012, p8. See <http://www.optus.com.au/about/sustainability/responsibility/customers/disability-services>

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| strategy of increasing number people with a disability within Optus' workforce, including contractors where applicable. | Review conducted of current practices and steps made to develop formal strategy. | | | major recruitment policy review in which diversity targeted recruitment has been identified as an opportunity for growth. The next few months will see a development of a recruitment strategy with more contingency for targeted recruitment. This has commenced with a review in Sales. |
| Provide and promote resources for People Managers on successful leadership of diverse employees, including employees with a disability and their carers. | Evidence that material is available for people managers to access and that information promoting these resources has been provided to people managers. | Human Resources in conjunction with BUs. | Ongoing. | This area is growing with the development of an Optus wide diversity and inclusion strategy which will be embedded in leadership (People Manager) development. Currently the addition of a Diversity Consultant role at Optus allows people access to an SME who can assist and refer them to materials and support agencies. |
| Develop disability recruitment partnerships. | <ul style="list-style-type: none"> ○ A relationship established with a disability partner; ○ An increase in the number of people employed with a disability. <p>Evidence that work has commenced with charity or community partners to identify 'work ready' candidates.</p> <p>Utilise graduate program to target individuals with a disability with the assistance of charity partners.</p> | <p>Human Resources.</p> <p>Human Resources.</p> <p>Human Resources.</p> | <p>End 2013.</p> <p>End 2013.</p> <p>End 2013.</p> | <p>Optus' activity to this action is ongoing.</p> <p>Optus is currently in discussion with the Australian Network on Disability (AND) to become a bronze member (subject to budget availability) and to partner in an IT initiative to assist the growth and technical systems supporting AND.</p> <p>A recruitment strategy update is under development to improve the number of work ready candidates.</p> <p>Possible review of existing talent scholarship currently based in SA with Optus Business.</p> |
| Promote volunteering opportunities for staff in the community to support people with disability. | Inclusion of communities of people with disabilities within volunteering partnerships. | Sponsorship and Community Programs/ Human Resources. | Annually. | <p>Optus staff are given the opportunity to volunteer in a community group of their choice for 1 day at company expense through Optus' yes4good program. Organisations who have received Optus staff to volunteer in 2013-2014 include:</p> <p>Australian Kookaburra Kids Foundation Australian Red Cross Autism West Support Incorporated Avalon Centre beyondblue</p> |

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| | | | | Bridges Cancer Council - Vic Cancer Council NSW Chris O'Brien Lifehouse Communication Rights Australia CREATE Foundation Foodbank NSW Guide Dogs NSW/ACT Horizon Theatre Company Ltd Karma Currency / Goodcompany Foundation Meals on Wheels Qld: Crosby Park Melbourne City Mission MS Research Australia National Centre For Childhood Grief Pty Ltd Northern Beaches Interchange Special Olympics NSW St Vincent De Paul Society NSW Starlight Children's Foundation Sydney Story Factory The Gawler Foundation The Salvation Army The Salvation Army (SA) Tour de Cure Uniting Care Prahran Mission Variety, the Children's Charity (NSW) Vision Australia Wesley Mission NSW Wingate Avenue Community Centre Workventures Youth Off The Streets |
| Leverage CSR Community Grants & Optus Country Grants to promote our Diversity strategy. | Evidence that Community Grants and Country Grants schemes have been promoted to groups supporting people with disability. | Sponsorship and Community Programs. | Annually. | Optus Community Grants have been supporting community organisations since 2008 focussing on programs that support vulnerable youth. Optus has since merged the Optus Country Grants into the Optus Community Grants program. |

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| | | | | <p>Each year, Optus' disability contacts are notified and invited to apply. Many community groups that have applied have advised they are either designed for or will be targeted to benefit people with a disability. These are highlighted in bold below.</p> <p>2012 recipient list:</p> <p>Belmore Police Citizens Youth Club Margaret Jurd College Bathurst Women & Children's Refuge Kempsey PCYC Marist Youth Care</p> <p>Yipirinya School Brahminy Foundation Limited The Haven Association Incorporated Spectrum Migrant Resource Centre Inc Banyule Housing Support Group Anglicare WA Augustinian Volunteers Australia Foundation</p> <p>Epilepsy Action Australia Sylvanvale Foundation Little Athletics Ronald McDonald House Adelaide Federation of Western Australia Police and Community Youth Centres the hub at Guyra Liverpool Fairfield Community Radio Tinana State School</p> <p>Inala Day Respite Centre Warwick U3A Inc Ararat Mens Shed Cowra High School Toronto High School</p> <p>Figtree Public School Eyre Futures Inc</p> <p>Nowra Athletics Club Inc. Ballina Soccer Club Incorporated</p> |

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| | | | | <p>Ballandean Soccer Club Inc Orbost Little Athletics Affiliated with Little Athletics Victoria Cervantes Primary School Parents & Citizens Association UNE Students In Free Enterprise (SIFE) Macarthur Legal Centre St Vincent de Paul - Nagle Centre Cosmos Motor Neurone Disease Association of Victoria</p> <p>2013 recipient list: AEIOU Foundation AnglicareSA Argyle Community Housing Bayley House Believe Foundation Incorporated Berkeley Vale Neighbourhood Centre Assoc Inc Capital City Local Learning and Employment Network Energy Education Australia Incorporated Family Access Network Griffith Police Citizens Youth Club (PCYC) Hello Sunday Morning Information and Cultural Exchange (ICE) Iramoo Youth Refuge Learning Links Little Heroes Foundation Media Access Australia Migrant Resource Centre Northern Tasmania Mowanjum Artists Spirit of The wandjina Aboriginal Corporation Muscular Dystrophy Association Inc Noosa Institute for Socio-Economic & Environmental Research Northlakes Community Services Incorporated (NCSI) Ohana Education Inc.</p> |

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| | | | | <p>Peter MacCallum Cancer Centre Prison Fellowship Australia NSW/ACT Queensland Police Citizens Youth Welfare Association – Whitsunday Branch Rockingham PCYC Southern Shoalhaven Youth Services Incorporated Stretch-A-Family</p> <p>Sunraysia Residential Services Inc.</p> <p>The Epilepsy Association of South Australia and The Northern Territory The Ted Noffs Foundation _Street university Canberra Time for Kids Inc. Toogoolawa Schools Limited. Top Blokes Foundation Twentieth Man Fund Inc. UCA - Parramatta Mission Western Chances Youth Advocacy Centre Inc</p> |
| Monitor the implementation of our Action Plan and report to Customer stakeholder representatives. | Review and report to disability working group on issues arising and progress against DAP. | Corporate and Regulatory Affairs. | 2 meetings annually of disability working group. | Disability working group meetings will no longer be called bi-annually as of December 2013. Regulatory Affairs continues to engage with customer stakeholder representatives on an 'as needs' basis. |
| Conduct review of progress of actions under our Action Plan, publish results and inform development of next plan. | <ul style="list-style-type: none"> ○ Inclusion of targets with Corporate Responsibility report. ○ Evidence of activities undertaken to explore and develop commercially viable and sustainable options to improve access to products and services for people with a disability. | Corporate and Regulatory Affairs in conjunction with BUs. | December 2013. | Annual activity undertaken as a result of the DAP or additional activity undertaken for customers with disabilities have been included within the Optus' annual Corporate Responsibility report. |
| Establish and promote networking opportunities for employees with a disability, or carers of people with a disability. | <p>Create internal social media tools for the purposes of establishing networking groups.</p> <p>Arrange for internal communications to promote networking tools.</p> | Human Resources. | December 2012. | <p>Optus has established internal social media sites, including an internal blog site for all staff. This has included online training and communications to assist staff in using these tools.</p> <p>While these are available for all staff to use, no networking groups have been established specifically</p> |

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| | | | | for staff with disabilities. |

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.

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| Review Optus' compliance with Web Content Accessibility Guidelines v2.0. | All new Optus owned websites or micro sites comply with guidelines. External review of website code undertaken to confirm compliance with WCAG 2.0. | Consumer and Digital Life. | End 2012. | Optus is progressively reviewing all Optus digital properties and uses qualified external consultants to review site development and provide recommendations. If sites fail WCAG 2.0 A/AA success criteria then the relevant IT and online teams are required to fix the outstanding issues. |
| Explore options to introduce mobile text access to Emergency Services the National Relay Service in cooperation with Australian Government, industry and consumer groups. | Readiness to implement in line with agreed Government direction. | Corporate and Regulatory Affairs in conjunction with Consumer. | Options evaluated as per Government timeline | Initial TUSMA contract with the NRS for SMS and IP based text communication does not formally permit access to emergency calls. Discussions commenced in 2014 with emergency services organisations and government on the introduction of a generally available capability for SMS to Triple Zero. |

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| <p>Explore options to improve the accessibility of information such as bills and related correspondence, contractual terms, and relevant marketing offers.</p> <ul style="list-style-type: none"> ○ Ensure marketing promotional activity to support Optus' Disability Equipment Program (DEP), including: <ul style="list-style-type: none"> ○ explore options to promote Optus' DEP in community languages, including Auslan; ○ explore options to develop an easy-version of a DEP brochure for customers with low levels of literacy. | <p>Evidence of programs that have reviewed existing promotional activity and explored options to improve accessibility.</p> | <p>Marketing divisions.</p> | <p>End 2013.</p> | <p>Additional promotional material specifically designed to advertise Optus' DEP has been reviewed. It has been determined that developing additional material is not required – very few customers or prospective customers have indicated they require additional information in this format.</p> <p>Optus is exploring adding captions to its 'Optus Guru' videos where posted online.</p> |
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3. 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.

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| <p>Optus sites are able to be easily accessible and navigable for people with a disability.</p> | <p>Evidence of assessments conducted against accessibility standards for all Optus sites.</p> | <p>Facilities Management.</p> | <p>Ongoing.</p> | <p>All Optus property, whether leased or owned, conforms to the current Building Codes of Australia (BCA). This code ensures all legislative and regulatory requirements are being met, including the DDA.</p> <p>Going forward the property department, in conjunction with WHS, will be incorporating specific checklists into the annual building audit program that will provide demonstrable evidence of compliance to the Disability Action Plan.</p> |

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| <p>Ensure access and workplace facilities for employees with a disability are implemented in all new sites.</p> | <p>All new buildings acquired or rented by Optus for commercial purposes comply with the Disability (Access to Premises – Buildings) Standard 2010.</p> | <p>Facilities Management.</p> | <p>From June 2011 ongoing.</p> | <p>As above.</p> |
| <p>Investigate opportunities to install a minimum of one counter loop and advise on Optus websites which Optus retail stores have a counter loop available.</p> | <p>Evidence of investigation conducted and commercial costs evaluated.</p> | <p>Consumer Sales.</p> | <p>End 2012.</p> | <p>Three portable counter loops have been installed at central stores in Melbourne and Brisbane under trial. A counter loop is shortly to be installed in Optus' central city store in Sydney.</p> <p>Trial results are still being examined.</p> |

4. Products and Services

To enhance access to Optus products and services.

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| <p>Explore commercially viable introduction of captioning and audio description on OptusZoo, including:</p> <ul style="list-style-type: none"> ○ Commercially viable options to obtain captioned movie/TV titles for download; ○ Capability of ODM systems and media player software/ devices to present suitable captions for download; ○ Monitoring and implementation of relevant outcomes. | <p>Evidence of exploratory actions taken towards the provision of captions for movie downloads from OptusZoo, including engagement with relevant stake-holders, including third party suppliers and partners.</p> | <p>Optus Digital Life.</p> | <p>End 2016, with progress review in 2013.</p> | <p>Optus doesn't currently provide a movie download service.</p> <p>Optus contracts with Fetch and Foxtel as third party vendors to deliver the Optus TV with Fetch and Optus TV featuring Foxtel subscription television services. These services include closed captions of their video streams as per obligations under the Broadcasting Services Act 1992, which require captioning targets for categories of content to be met each financial year.</p> <p>Annual reports are provided to the ACMA on compliance with these targets. Further information is available at: http://www.acma.gov.au/Citizen/Consumer-info/Rights-and-safeguards/Captioning/captioning-1</p> <p>Optus provides the following advice to its customers on how to access closed captioning for both Optus TV with Fetch and Optus TV featuring Foxtel: .</p> <ul style="list-style-type: none"> • Closed Captions for Optus TV with Fetch: http://www.optus.com.au/shop/support/answer?question=Fetch%20Closed%20Captions&answerId=2206&typeId=6 • Closed Captions for Optus TV feat. Foxtel: http://www.optus.com.au/shop/support/answer?question=Foxtel%20Closed%20Captions&answerId=2205&typeId=6 <p>Captions for movies that are purchased as Video On-Demand have not been deemed as commercially viable at this point in time.</p> |
| <ul style="list-style-type: none"> ○ Monitor national and overseas trends in the development of accessible telecommunications products and services for people | <p>Evidence of monitoring and investigation of national and international trends in product</p> | <p>Optus Digital Life, Technology &</p> | <p>End 2016, with progress review in</p> | <p>Optus continues to provide a fixed handset model that features options for customers who are hearing impaired, including T-coil compatibility and volume control. This has been reviewed to ensure Optus suite</p> |

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| <p>with a disability, including universal design and explore commercially viable and sustainable options to implement for customers;</p> <ul style="list-style-type: none"> ○ Monitor outcome of the Department of Broadband, Communications and the Digital Economy's "Review of access to telecommunication services by people with disability, older Australians and people experiencing illness". | <p>development for people with a disability.</p> | <p>Planning.</p> | <p>2013.</p> | <p>includes the latest models in keeping with market developments.</p> <p>There is no outcome to date from the DBCDE (now Department of Communications) review.</p> |
| <p>Monitor performance of Customer Care in awareness of Optus' DEP processes, including TTY access, and implement improvements where practicable.</p> <ul style="list-style-type: none"> ○ Monitor voice recognition technologies and implement improvements where possible; ○ Monitor awareness of the role of the National Relay Service among employees; ○ Continue to explore options afforded by emerging technologies to improve text-based access to Optus, including online 'chat', email and social-media pages. | <p>Evidence of improvement in Customer Care awareness of Optus disability equipment program processes.</p> <p>Evidence of increased levels of internal communication about DAP components.</p> | <p>Consumer.</p> | <p>End 2016, with progress review in 2013.</p> | <ul style="list-style-type: none"> • Improvements have been made in the Care IVR technology team to allow maximum prompt times for entering in account details etc to allow customers with accessibility and dexterity issues to respond in the required time. • Optus has participated in the NRS's Hearing Awareness Week (HAW) activities for the past 3 years. Care participated in HAW by distributing posters, promotional kits and information packs in team meetings. <p>Periodic training reminders and mystery calls are conducted to various centres and queues following HAW activity.</p> <p>Communications have been sent to all Consumer frontline staff to raise awareness of the NRS and Optus' disability services.</p> <ul style="list-style-type: none"> • Optus was a subject of ACCAN's mystery shopping exercise on staff awareness of disability services with poor results. <p>Optus' process teams have used this feedback to streamline staff search functions when searching internally for disability service information. Subsequent mystery shopping calls indicate an improvement as a result.</p> |

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| | | | | <p>Further development is underway to enhance Optus' Care and Sales training to foster greater awareness for Optus' service in store and over the phone.</p> <ul style="list-style-type: none"> Optus has increased its web chat teams to include both Care and Sales enquiries. Optus teams have received several awards for their outstanding customer service. These include: <ul style="list-style-type: none"> - 2012 - Service Excellence (Australian Business Awards) - 2013 - Best use of Social Media in a Contact Centre (Contact Centre Awards – Asia Pacific) - 2013 - Best Use of Social Media in a Contact Centre (Global Contact Centre Awards – Las Vegas) |
| Consult on DEP product development, re-view and maintain support with Optus' disability consumer forum. | Evidence of consultation sought on at least annual basis. | Optus Digital Life devices teams, in conjunction with Corporate and Regulatory Affairs. | By 2013 review. | Optus' Consumer Liaison Forum has been disbanded. Therefore this action is no longer applicable. |
| Review the effectiveness of Optus' DEP application process, including eligibility, and implement improvements where practicable, in consultation with the disability consumer forum. | Evidence of review undertaken. | Optus Digital Life devices teams, Consumer Product Management teams in conjunction with Corporate and Regulatory Affairs. | End 2016, with progress review in 2013. | A review has been undertaken in 2014. To date no changes to the application processes were deemed necessary. |
| Participate in industry discussions for development of Real Time Text Communication, such as terminal software (or apps) and contact with Emergency Services. | Evidence of participation in industry discussions. | Optus Digital Life devices teams, Consumer Product Management teams in conjunction with Corporate and Regulatory Affairs. | End 2016, with progress review in 2013. | Optus Regulatory continues to participate in Comms Alliance discussions, ACMA's ECSAC and the National Emergency Call Working Group. |
| Participate in any industry discussion on solutions for Real Time Visual | Evidence of participation in industry | Optus Digital Life devices teams, | End 2016, with progress review in | There have been no industry discussions during this |

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| Communication (3G) and review internal strategic plans for sign language and 3G services; and PC-to-Mobile video calling | discussions. | Consumer Product Management teams in conjunction with Corporate and Regulatory Affairs. | 2013. | review period. |
| Explore development of new apps for mobile products that are compatible with alternative access technologies for mobile phones. | Evidence of reviews undertaken. | Optus Digital Life. | End 2016, with progress review in 2013. | <p>Optus has developed its MyOptus app to ensure it is accessible to customers. Particular attention has been given to user experience for customers with vision impairments and colour deficiency including achromatopsia, deuteranopia, tritanopia and protanopia.</p> <p>All new work supports accessible features and is aligned the app development guidelines.</p> <p>Today, 95% all usage screens support accessible features and 50% of all other screens are supported.</p> |