



# Optus Disability Action Plan 2012.

## Foreword



Optus is a leader in integrated telecommunications, servicing more than nine million customers every day. We are a champion of competition and have been instrumental in providing choice and value for money in Australian telecommunications since 1992.

Optus is committed to looking out for our customers and the wider community by taking our products and services to market in a responsible and transparent manner, enabling telecommunication access and connection to society. We acknowledge the benefits that new developments in communications technologies bring to people with a disability.

This is Optus' third Disability Action Plan. I'm proud that Optus and our people continue to improve on past efforts and are working to maximise the positive impact we can have in providing the benefits of competition to people with a disability.

Our mission is to enable communication by breaking barriers and building bonds. Through this plan, we are indicating our commitment to building a corporate culture for a talented workforce that aims to promote diversity and eliminate discrimination. We also commit to meeting the ongoing challenge of ensuring our products and services remain as accessible as possible to our customers with a disability.

A handwritten signature in black ink, appearing to read 'Kevin Russell'. The signature is fluid and cursive.

**Kevin Russell**

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# Section 1: Context

## Introduction

Optus is Australia's second largest telecommunications company. With nearly 10,000 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. Future services 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 Vision and Values

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

Providing for the needs of people with disabilities is consistent with Optus' Vision of being a leader in integrated communications. The Optus Values form a foundation, and support our promise of making things possible for our customers. Our vision is to lead Australia in outstanding customer experience. In striving to achieve this, five essential Values guide our actions:

### Challenger Spirit

Optus was founded to be the challenger, to be nimble and bring innovation to the marketplace. Challenger Spirit is about taking calculated risks, breaking new ground and ultimately finding new ways to meet customer needs.

### Customer Focus

Our customer is at the centre of everything we do. Customer Focus is about simplifying the customer experience, and connecting people through accessible technology. Maintaining the quality of our service requires not only innovative products and pricing, but a commitment to treating each customer with respect.

### Integrity

The way we conduct ourselves and our business impacts our reputation. Operating with integrity means taking responsibility for our actions, always meeting the highest ethical standards, and delivering on our promises.

### Personal Excellence

Personal Excellence requires every one of us to contribute our best. It means always striving for a higher standard of performance, and actively seeking opportunities for improvement and personal and professional growth.

### Teamwork

By working together we accomplish more. At Optus, we value the contribution of each team member, and encourage open and honest discussion. We recognise the value that diversity brings to our organisation.

## 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 / 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*', in relation to a person, 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 judgment 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 the future (including because of a genetic predisposition to that disability); or
- (k) is imputed to a person.

To avoid doubt, a *disability* that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.<sup>1</sup>

In 2009 the Australian Bureau of Statistics estimated that 4 million Australians had a disability, representing 18.5% of the population<sup>2</sup>. A significant portion of our population either lives with a disability or cares for someone who lives with 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.

<sup>1</sup> *Disability Discrimination Act 1992*, Section 4 Interpretation

<sup>2</sup> Australian Bureau of Statistics, *4430.0 - Disability, Ageing and Carers, Australia: Summary of Findings, 2009*  
<http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Main%20Features22009?opendocument&tabname=Summary&prodno=4430.0&issue=2009&num=&view=>

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;
- being able to effectively control handset and service functions;
- being able to read bills;
- 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).

Optus also recognises and supports the intentions of the *National Disability Strategy*<sup>3</sup> in using the NBN as a means of creating access services and technology platforms as a means of creating products that enhance accessibility to customers with a disability.

## 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).

This version of the Optus Disability Action Plan has been prepared to align with good practices set out in Australian Human Rights Commission guidelines *Disability Discrimination Act Action Plans: A Guide for Business*<sup>4</sup>.

## Industry Codes and Standards

Optus actively supports the development of Industry Codes and Technical Standards through its membership of Communications Alliance Ltd.

In identifying compliance with specific industry 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, in particular *C625: 2005 Information on Accessibility Features for Telephone Equipment Industry Code* and *G586:2006 Disability matters: Access to Communication Technologies for People with Disabilities and Older Australians*. Optus also reiterates its commitment to providing all customers, including those with a disability, with a high quality of fair dealings and customer service. Optus complied with and was a signatory to the *C628: 2007 Telecommunications Consumer Protection (TCP) Code*. Optus also made a significant contribution to the 2011-2012 review of this Code and expects to maintain its existing high level of compliance.

<sup>3</sup> 2010 – 2020 National Disability Strategy Summary Document, p3

<sup>4</sup> [http://www.hreoc.gov.au/disability\\_rights/action\\_plans/Business\\_Guide/business\\_guide.html](http://www.hreoc.gov.au/disability_rights/action_plans/Business_Guide/business_guide.html)

## Development of the Optus Disability Action Plan

### Background

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 Plan Working Group firstly identified the key issues to be addressed by the Plan and secondly the objectives to address each of these. Consultation with Optus staff members, The Human Rights and Equal Opportunity Commission (HREOC) (now AHRC) and other organisations was used to ensure strategies were achievable and consistent with external benchmarks.

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). Optus maintains this broader consultation process through its Disability Sub-Working Group and the working group members continue to provide specialist input regarding disability issues in the context of their knowledge of Optus and inform the contents of this Plan.

This is Optus' third plan since its inception in 1998. Previous reviews of the plan were conducted in 2000, 2002 and 2005.

### Consultation

The following internal business groups have been consulted and have contributed to the commitments outlined in this Plan:

- Optus Digital Media (Product Management, Strategy and Business Development, Digital Devices, Digital Sales and Service),
- Consumer Sales,
- Consumer Customer Service, including Operator Services,
- Fixed Telephony Product Management,
- Human Resources (Learning and Organisational Development and Employee Relations),
- Corporate and Regulatory Affairs, and
- Billing Services.

### External Consultation

External consultation has been sought with members of Optus' Consumer Liaison Forum Disability Working Group. Consultation has been received from a variety of organisations including:

- Australian Communications Consumer Action Network (ACCAN),
- Blind Citizens Australia,
- Deaf Australia,
- Deafness Forum, and
- Physical Disability Australia.

## Guiding Principles

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

- In implementing the Plan, Optus will continue to 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 cannot be achieved practicably, Optus will adopt a future focus.

## Section 2: Monitoring and Evaluation

Optus' Disability Action Plan is 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.

Optus proposes that reviews of its Disability Action Plan will occur every five years. The next review report will be scheduled for the end of 2016.

A review document will be published at the end of the review period outlining the completed actions against the objectives of the Plan. Review documents from previous Optus Disability Action Plans can be downloaded from [optus.com.au/disability](http://optus.com.au/disability).

In the 2012 Plan, the timeframes of completion of outcomes will be determined on a case by case basis. 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.

By the end of 2013, Optus will also commit to providing a review of our DAP customer equipment program against any related activity undertaken/governed by USO Co or Telecommunications Universal Service Management Agency (TUSMA). This will also be published on our website [optus.com.au/disability](http://optus.com.au/disability).

## Section 3: 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 develop and deliver components of the internal communications / training program.



Action	Performance Indicator	Responsibility	Timeframe
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 their induction and refresh this training every two years.  All new staff to complete Optus' an Anti Discrimination and Harassment Policy training via training modules and intranet sites.	Human Resources.	Ongoing.
Complaints regarding disability discrimination to be handled by existing HR processes.	Evidence that complaints have been handled in line with HR process.  No findings will have been made against Optus in relation to disability discrimination.	Human Resources.	End 2016.
Develop processes to implement strategy of increasing number people with a disability within Optus' workforce, including contractors where applicable.	Engagement with community services.  Review conducted of current practices and steps made to develop a formal strategy.	Human Resources.	December 2012.
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.
Develop disability recruitment partnerships.	<ul style="list-style-type: none"> <li>• A relationship established with a disability partner;</li> <li>• An increase in the number of people employed with a disability.</li> </ul>	Human Resources.	End 2013.
	Evidence that work has commenced with charity or community partners to identify 'work ready' candidates.	Human Resources.	End 2013.
	Utilise graduate program to target individuals with a disability with the assistance of charity partners.	Human Resources.	End 2013.
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.
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.
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.
Compile and publish annual results through our Corporate Social Responsibility Report.	Inclusion of updates into annual Corporate Social Responsibility Report.	Sponsorship and Community Programs, Corporate and Regulatory Affairs.	Annually.

Action	Performance Indicator	Responsibility	Timeframe
Conduct review of progress of actions under our Action Plan, publish results and inform development of next plan.	<ul style="list-style-type: none"> <li>Inclusion of targets with Corporate Responsibility report</li> <li>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</li> </ul>	Corporate and Regulatory Affairs in conjunction with BUs.	December 2013.
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.
Staff are informed about Optus' Disability Action Plan.	<p>Update on content of Plan provided to staff through internal communication forums, in particular at review periods.</p> <p>Staff informed of location of DAP on Optus websites.</p>	BU Management, Human Resources.	Ongoing.

## 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:

- maximising utilisation of existing methods of communication with people with disabilities, such as via TTY, the web site, etc.
- 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.

Action	Performance Indicator	Responsibility	Timeframe
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
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.
Explore options to improve the accessibility of information such as bills and related correspondence, contractual terms, and relevant marketing offers.  <ul style="list-style-type: none"> <li>Ensure marketing promotional activity to support Optus' Disability Equipment Program (DEP), including: <ul style="list-style-type: none"> <li>explore options to promote Optus' DEP in community languages, including Auslan;</li> <li>explore options to develop an easy-version of a DEP brochure for customers with low levels of literacy.</li> </ul> </li> </ul>	Evidence of programs that have reviewed existing promotional activity and explored options to improve accessibility.	Marketing divisions.	End 2013.
Review and improve where possible processes to resolve disability-related complaints, and enable analysis to address any identified complaint root causes.	Evidence that level of complaints (identified as made by customers who have identified having a disability and this has had a direct bearing on the complaint itself) is reduced.	Customer Relations Group.	Ongoing.
Review and revise operational processes to ensure Optus meets disability-related regulations and industry codes and standards.	Evidence of operational processes relating to compliance with industry codes, standards and regulations.	Consumer.	End 2016.
Proactively engage with telecommunications industry participants and suppliers (e.g. Mobile Manufacturers Forum, Australian Mobile Telecommunications Association, and Communications Alliance) to identify and implement opportunities to improve access for people with a disability.	Evidence of engagement at industry level to progress discussion on opportunities that become available as new technology is developed.	Regulatory and Corporate Affairs, Consumer.	End 2016.

### 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.

The physical environment encompasses the following areas:

- (i) Optus workplace premises (predominantly buildings in major capital cities of Australia), including Optus owned retail stores;
- (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;
- (h) parking for staff with disabilities or customers with disabilities at Optus sites.

Action	Performance Indicator	Responsibility	Timeframe
Optus sites are able to be easily accessible and navigable for people with a disability.	Evidence of assessments conducted against accessibility standards for all Optus sites.	Facilities Management.	Ongoing.
Ensure access and workplace facilities for employees with a disability are implemented in all new sites.	All new buildings acquired or rented by Optus for commercial purposes comply with the Disability (Access to Premises – Buildings) Standard 2010.	Facilities Management.	From June 2011 ongoing.
Investigate opportunities to install a minimum of one counter loop and advise on Optus websites which Optus retail stores have a counter loop available.	Evidence of investigation conducted and commercial costs evaluated.	Consumer Sales.	End 2012.

### 4. 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;
- content services.

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

Action	Performance Indicator	Responsibility	Timeframe
<p>Explore commercially viable introduction of captioning and audio description on OptusZoo, including:</p> <ul style="list-style-type: none"> <li>• Commercially viable options to obtain captioned movie/TV titles for download;</li> <li>• Capability of ODM systems and media player software/devices to present suitable captions for download;</li> <li>• Monitoring and implementation of relevant outcomes.</li> </ul>	<p>Evidence of exploratory actions taken towards the provision of captions for movie downloads from OptusZoo, including engagement with relevant stakeholders, including third party suppliers and partners.</p>	<p>Optus Digital Life.</p>	<p>End 2016, with progress review in 2013.</p>
<p>Explore commercially viable and sustainable options to improve access to Optus products and services for people with a disability, including:</p> <ul style="list-style-type: none"> <li>• Undertaking target market research on the disability segment to identify and inform product, service and communication opportunities;</li> <li>• Exploring commercial partnership opportunities with key disability service providers;</li> <li>• Ensuring ongoing accessibility and affordability of suitable prepaid and postpaid mobile handsets, to include an extensive accessibility feature set;</li> <li>• Exploring options for commercially viable fixed and mobile video calling options for customers who are deaf and who use Auslan as their preferred language.</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence of review of options to provide products and services that would suit customers with accessibility challenges;</li> <li>• Evidence of ongoing discussions with vendors to provide suitable commercially viable prepaid and/or postpaid handsets with accessibility features;</li> <li>• Evidence of review of video calling options available for customers.</li> </ul>	<p>Product Management of Consumer.</p>	<p>End 2016.</p>

Action	Performance Indicator	Responsibility	Timeframe
<ul style="list-style-type: none"> <li>Monitor national and overseas trends in the development of accessible telecommunications products and services for people with a disability, including universal design and explore commercially viable and sustainable options to implement for customers;</li> <li>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".</li> </ul>	Evidence of monitoring and investigation of national and international trends in product development for people with a disability.	Optus Digital Life, Technology & Planning.	End 2016, with progress review in 2013.
<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"> <li>Monitor voice recognition technologies and implement improvements where possible;</li> <li>Monitor awareness of the role of the National Relay Service among employees;</li> <li>Continue to explore options afforded by emerging technologies to improve text-based access to Optus, including online 'chat', email and social-media pages.</li> </ul>	<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>	Consumer.	End 2016, with progress review in 2013.
Consult on DEP product development, review 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.
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.
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.
Participate in any industry discussion on solutions for Real Time Visual Communication (3G) and review internal strategic plans for sign language and 3G services; and PC-to-Mobile video calling.	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.

Action	Performance Indicator	Responsibility	Timeframe
Review availability of handsets for people with a disability such as: <ul style="list-style-type: none"> <li>Information Accessibility Code compliance;</li> <li>Provision of low cost mobile phones.</li> </ul>	Evidence of review undertaken in conjunction with commercial assessments.	Optus Digital Life, Consumer.	Ongoing. (reported annually in CSR Report)
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.

## Disability Action Plan – Register of Current Items

From time to time there may be issues that arise from the Optus consumer forum that will be investigated in parallel to the plans outlined above. These issues will be included in the Register of Current Items and included in the next DAP Review report.

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 4: Inquiries and 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 / Mobile Customer Service

- Voice: 133 937
- TTY: 1800 123 124

Include website disability services page 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 TCP 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 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

<b>AHRC</b>	Australian Human Rights Commission.
<b>BU's</b>	Business Units, including those that do not interface directly with our customers, e.g. Optus Technology and Planning, Optus Networks.
<b>DAP</b>	Disability Action Plan.
<b>DDA</b>	Disability Discrimination Act 1992.
<b>DEP</b>	Disability Equipment Program.
<b>DWG</b>	Disability sub-working group that liaises with Optus to raise any specific consumer issues and assist on forming policies to address needs for customers with a disability.
<b>EEO</b>	Equal Employment Opportunities.
<b>HREOC</b>	Human Rights and Equal Opportunity Commission (now AHRC).
<b>OH&amp;S</b>	Occupational Health and Safety.
<b>TCP</b>	Telecommunications Consumer Protection Code.
<b>TTY</b>	Telephone Typewriter.