

# **Optus Disability Action Plan**

# 24 Month Review January 2001- December 2002

## Introduction

The following report aims to monitor performance and review progress with the implementation of the Optus Disability Action Plan (the Plan) in the 24 months from January 2001 to December 2002. It is the third formal Review that has been completed since the Plan was launched in December 1999. Performance has been monitored and evaluated in two ways:

## (i) Implementation of Strategies

The implementation of the Plan has been monitored against the timeframes identified for each strategy.

## (ii) Outcomes of the Plan

The efficacy of the Plan in achieving the Key Outcomes has been assessed against the following Performance Indicators:

Performance Indicator 1. Low percentage of customer complaints/staff grievances

relating to disability matters

Performance Indicator 2. Increased number of customers with a disability

Performance Indicator 3. Continued positive feedback from disability stakeholders

with regards to Optus' initiatives for people with disabilities.

1

The Report has been prepared with input from the Optus Disability Action Plan Working Group and has been circulated to internal and external stakeholders.

Optus would like to thank the members of its Disability Action Plan Working Group who play a vital role in guiding the implementation of the Plan, as well as continue to provide open and constructive feedback concerning Optus' performance against the Plan's initiatives.

# 1. Background

The Optus Disability Action Plan was launched in December 1999. The Plan aims to remove barriers to access for customers, potential customers and staff and is consistent with the Optus corporate values of 'Acting as One', 'Challenger Thinking', 'Taking Ownership' and 'Personal Renewal'.

## Summary of key objectives of the Action Plan:

*Objective 1 - Corporate Culture* 

• To achieve a responsive anti-discriminatory culture

Objective 2 - Accessible Communications

• To improve accessibility to information about Optus' products and services

## *Objective 3 - Confidentiality*

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

## Objective 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.

## *Objective 5 - Products and Services*

• To enhance access to Optus products and services

# 2. 24 Month Summary of Progress (Implementation of Strategies)

Section Two of this Review summarises progress with implementation of the Plan during the past 24 months and looks at the focus of implementation for the next 12 months, from January 2003 to December 2003.

For information on strategies that have previously been completed / implemented in previous years, please refer to the Plan Reviews for those years.

In summary, Optus is encouraged by the results of the performance of the Plan against its objectives. Implementation of most of the Plan's strategies is on target. It is considered that the implementation of the Plan is achieving the aim of removing barriers to access and increasing awareness of the commitment to ensuring products and services are accessible. This increase in awareness has generated additional enquiries from customers and employees which have been used to further guide the implementation of the Plan.

One of the key initiatives implemented under the Plan has been the introduction of a disability equipment solution to ensure equitable access to Optus Local Telephony products. Telephone Typewriter (TTY) handsets became available in mid-2001 and additional disability handsets were trialled in the latter part of that year.

Other initiatives have already demonstrated the benefit of removing barriers to access for people with disabilities. For instance, the launch of Braille bills for Optus' Local Telephony, Long Distance Telephony and Mobile products; the launch of online billing for Mobile accounts; and Web Accessibility staff training.

Optus has welcomed feedback on the implementation of initiatives under the Plan from a wide range of stakeholders, including customers, staff and consumer organisations. It has been particularly pleasing to receive positive feedback on initiatives under the Plan from customers with a disability; from organisations representing people with disabilities; Optus' Disability Action Plan Working Group; and from Government.

While anecdotally there is evidence that the Plan is being received positively by external stakeholders and that it continues to generate interest and action within Optus, it is difficult to quantify all outcomes. It is clear, however, that there has been an increase in enquiries from customers over the past 24 months and these results have been reported against in this review.

# Focus of Implementation – January 2001 to December 2002

Implementation of Plan strategies during 2001 - 2002 focussed on the following:

## Internal awareness

- Review of customer service processes for handling disability related enquiries and escalation to specialist disability enquiry contact point. Refresher training and updates provided to customer-facing staff at regular intervals regarding these processes.
- Continued awareness raising of disability issues within the mobile business to ensure benefits for all customers from solutions such as SMS across the network and CDMA trial phones within retail outlets.
- Ensuring disability issues were taken into account when implementing strategies to achieve compliance with the *Privacy Amendment (Private Sector) Act 2000* which came into effect on 21 December 2001.
- Ensuring ongoing reward and recognition of customer facing staff displaying excellence in handling specialist/disability enquiries.
- Development of an online training module for new and existing employees covering diversity, with specific sections focusing on disability awareness.

## **Equipment**

- Review of TTY customer service processes to ensure consistency with voice Customer Service and to ensure compliance with privacy requirements.
- Implementation of an equipment solution for the Optus Local Telephony product, including soft launch of the TTY equipment program and trials of a volume control handset. (See Appendix A for a detailed progress report).
- Two models of TTY handset became available to customers in April 2001, the Uniphone 1150 and the Superprint 4425.
- A volume control handset was trialled with approximately 300 customers nationally to assess its suitability across a diverse range of customers, specifically those with mild to severe hearing impairments, visual impairments and/or mobility or dexterity impairments.
- Scoping solutions for disability equipment offerings for Optus' Local Access Resale (LAR) customer base.
- Ensuring Universal Design Principles applied to product development processes.

#### Websites

- Conducting an internal training session held by an external website accessibility expert, for Optus staff involved with designing and maintaining both external and internal websites.
- Continued awareness raising and training with appropriate areas to ensure website accessibility is taken into account when websites are developed or updated.
- Ongoing evaluation of Optus Websites against Website Accessibility Guidelines developed from International Guidelines.
- AUSLAN video clip completed and shown on Optus website as part of the Deaf Australia Online II project.

## **Billing**

- Implementation of Braille bills for Local Telephony, Long Distance and Mobile products and associated staff and customer awareness campaigns. Braille bills were advertised nationally on Radio for the Print Handicapped to advise customers of the launch, and associated internal awareness activities were undertaken to coincide with this.
- Implementation of online billing for the Mobile product.
- Ensuring TTY Customer Service numbers included on all bills and also on relevant customer collateral.

#### Access

- Resolution of parking issue for a staff member with a disability at one of Optus' sites.
- Installation of a revolving wheel chair accessible door at the Optus Centre Melbourne.
- Disability provisions included into the New Facility Assessment Checklist after consultation with Building Code consultancy firm that specialise in disability related provisions.

## Identification

- Forms of identification were reviewed at regular intervals to ensure that prospective customers were not being excluded based on their lack of common identification requirements.
- Review and enhancement of identification checking processes and third party access provisions for both Optus' Mobile and Consumer and Multimedia customer service divisions.

#### **Customer Satisfaction**

Opportunities were scoped for evaluating customer satisfaction of Optus' telecommunications services for customers with disabilities in Optus' standard customer satisfaction surveys. A limited trial was conducted, however, due to privacy considerations, it was established that adding questions regarding disability to Optus' Customer Satisfaction Surveys would not be appropriate on an ongoing basis. However, information is generally obtained from customers who participate in equipment trials, and this provides an indication of the level of customer satisfaction in relation to products and services.

## Focus of Implementation – January 2003 to December 2003

The key focus of Implementation for the period 1 January to 31 December 2003 includes (not in priority order):

- Release of additional equipment for local telephony customers, including Local Access Resale customers
- Implementation of further handset trials to assess functionality and compatibility of equipment against a range of disabilities, including sight, hearing and mobility impairments.
- Launching and promoting Optus' Disability Equipment Program. Undertaking internal staff training and awareness raising activities to support the launch of the program.
- Continued awareness raising amongst retail outlets of disability issues. Ensuring retail outlets have access to information to effectively address disability related queries (e.g. Primary Forms of ID; alternate formats for information, etc).
- Continued scoping of access opportunities for retail outlets and provision of information to customers/potential customers regarding access.
- Continued awareness raising with staff who work on both internal and external websites regarding accessibility issues, and ensuring that all new web pages/sites are built in an accessible manner.
- Ensuring that Optus continues to achieve compliance with EEO and OH&S requirements regarding people with disabilities.
- Ongoing staff communication initiatives to highlight the objectives and strategies under the Plan. Ensuring the continued delivery of tailored staff communication campaigns that encourage effective and appropriate interaction with customers with a disability.
- Continued consultation with peak disability groups and Optus' Disability Action Plan Working Group to prioritise tasks under the Plan and identify new initiatives to deliver enhanced services and products to customers.

# 3. Progress with the Implementation of Strategies

Section Three of this Review tables progress with the implementation of strategies against each of the Plan's objectives over the past 24 months. The below tables indicate strategies that were completed during this period, are yet to be completed, are in progress, or are ongoing.

# Objective 1 - Corporate Culture

To achieve a responsive anti-discriminatory culture

Strategy	Status
1.1 – Internal Communications	Completed and Ongoing
Ongoing communications initiatives:	
- inclusion in staff newsletter;	
- emails to staff raising awareness levels of disability matters and	
the Plan;	
- a new initiative - all new employees now receive information	
about the DAP in their letters of offer of employment. It is	
strongly suggested that all new employees make themselves	
familiar with the Plan and associated Reviews.	
1.2 – Employee Training	Completed and Ongoing
	(various actions
• Disability awareness training for staff and management including:	completed at regular intervals)
- development of presentation on disability awareness that managers deliver to their staff at regular intervals;	
- expansion of equipment solutions website detailing regulatory,	
marketing and policy issues;	
- ongoing development of disability specialists in centralised	
customer service/regulatory areas, including specialist privacy	
officer to handle disability related privacy queries;	
- personalised training/feedback is provided to staff who raise	
specific questions relating to disability matters;	
- regular bulletins issued to relevant staff.	Т
Disability awareness training for targeted staff to commence in	To commence
parallel with equipment solution including:	
- use of intranet "online" training modules regarding equipment	
solutions;	Completed
Online Disability, Cultural and Linguistic Diversity training	Completed
module developed which can be viewed by all employees	
commencing at Optus, as well as existing staff. This module caters not only for employees commencing in customer facing	
roles, but all new employees starting their employment with the	
company. The module contains specific training, operational	
and process related material for customer facing staff.	
1.3 – Reinforce Positive Behaviour	Completed and Ongoing
1.3.1 – Disability awareness/responsiveness recognised in Optus'	Completed and Ongoing
Reward and Recognition programs for customer facing staff	
Performance and Development Review feedback provided to	
line managers in recognition of excellence displayed by staff	
handling disability related matters.	
Implementation of other initiatives coinciding with introduction	
1 Implementation of other initiatives conferency with introduction	ı

of disability equipment solution, including: identification of customer service excellence in disability related matters; disability responsiveness, as demonstrating Corporate Core Values to be nominated for internal achievement awards. 1.4 – Employer Responsibility Completed and Ongoing (this action is completed at regular intervals) 1.4.2 – Updating of EEO procedures • Ongoing monitoring of EEO procedures/policies to be conducted to ensure they are maintained to remove barriers to access for people with disabilities and ensure discrimination is prevented. 1.4.3 – Review of OH&S procedures • OH&S Policies reviewed and considered consistent with aims of Action Plan. 1.4.4 – Identification and Resolution of specific OH&S issues Action on specific issues included: Installation of automatic door access to front entrance of Melbourne Office has been completed. 1.5 – Externally Focussed Ongoing 1.5.1 – Monitor work in international forums relating to disability Positive feedback received from CEO of UK Employer's Forum on Disability, noting Optus Disability Action Plan as a model for other organisations to adopt. General monitoring of international activities occurring via media, disability and other networks. Optus Regulatory staff regularly attend external disability workshops, exhibitions, and industry meetings to keep abreast of both national and international developments. Copies of the Action Plan distributed by a representative of TEDICORE at a technology conference in Europe – this may potentially initiate contact from other organisations internationally. Copies of Action Plan distributed at Society of Consumer Affairs Professionals (SOCAP) conference, as well as update provided about the development and progress of the Plan. Copies of Optus' Disability Action Plan provided to all members of Optus' Consumer Liaison Forum for reference by member organisations. Pack of information on Optus' Cultural and Linguistic Diversity Plan (which provides references to the Disability Action Plan) provided to Consumers Telecommunications Network for use in its newsletter. Similarly, information provided for use by the National Council of Women Australia and the Federation of Ethnic Communities Councils of Australia. • Presentation on Optus' Disability Action Plan given at the 2001 Rehabilitation and Assistive Australian Technology Association conference.

1.5.2 – Build strong links with parent company

Due to new ownership by SingTel, Optus will be looking at ways of forming links and working with SingTel on future

# Objective 2 - Accessible Communications

• To improve accessibility to information about Optus' products and services

Strategy	Status
<ul> <li>2.1 – Identify the information needs of people with disabilities who are:</li> <li>customers, or</li> <li>employees of Optus, or</li> <li>markers of the public who communicate with Optus</li> </ul>	Completed (to be reviewed on an ongoing basis)
<ul> <li>members of the public who communicate with Optus.</li> <li>2.2 – Review existing methods/identify gaps</li> <li>Gaps identified and prioritised in consultation with DAP Working Group.</li> </ul>	Completed (to be reviewed on an ongoing basis)
<ul> <li>2.3 – Implement strategies to address gaps</li> <li>Optus' retail and corporate website continues to be updated with topical and comprehensive information on products, services and corporate activities. Downloadable files are generally provided in alternate formats such as Word, PDF and future options for Video/audio are being canvassed.</li> </ul>	Completed and Ongoing
<ul> <li>Additional staff training conducted in Website accessibility by specialist external trainer.</li> </ul>	Completed
<ul> <li>Ongoing evaluation of Optus Websites against Website Accessibility Guidelines developed from International Guidelines.</li> </ul>	Completed and Ongoing
<ul> <li>Additional internal Customer Service TTY handsets added to ensure adequate response times provided to customers who communicate with Optus via TTY.</li> <li>TTY Customer Service Processes reviewed and enhanced.</li> <li>Consultation with representatives from relevant disability organisations in relation to enhancing Optus' TTY Customer Service offering completed.</li> <li>Advertising of Braille coincided with release of these Braille bills in May 2001. Braille Bills were advertised on the Radio for Print Handicapped as well as through the quarterly "Yes Connect" and "Optus Mobile" residential newsletters, distributed to all residential customers.</li> <li>Online billing became available for Mobile customers in late 2001.</li> </ul>	Completed
<ul> <li>2.4 – Adequacy of Third Party Access</li> <li>TPA considered adequate to ensure access is provided for third party while protecting customers from illegitimate access. This policy is adopted consistently for all customers, i.e. those accessing via TTY customer service line.</li> <li>Awareness raising of TPA policy conducted by disability contact and centralised regulatory interface group with relevant customer service staff and management as required.</li> </ul>	Completed (this action is reviewed at regular intervals)
<ul> <li>2.5 – ACIF Codes</li> <li>Compliance with ACIF Consumer Code requirements is considered a key focus of strategies under Objective 2 of the</li> </ul>	

	Plan. Optus is committed to becoming a signatory to all	
	registered ACIF Consumer Codes.  Compliance readiness assessment has commenced on all registered ACIF Consumer Industry Codes and specific	In progress
	disability provisions identified.  Optus became a signatory to the ACIF Codes on Complaint	Completed
	<ul><li>Handling and Credit Management in May 2001.</li><li>Additionally, Optus re-signed to revised versions of these</li></ul>	
	Codes and also signed up to the Calling Number Display (CND) and Customer Transfer Codes in May 2002.	
•	• Compliance assessment against the Billing Code has commenced. Optus is compliant with the majority of Code provisions and scoping of further implementation options	In Progress
	continues.  Compliance assessment against the Prices, Terms and	
	Conditions (PTC) Code has commenced. Optus is compliant with the majority of Code provisions and scoping of further	
	<ul><li>implementation options continues.</li><li>A comprehensive privacy audit to assess compliance with the</li></ul>	Completed
	new Private Sector Privacy Legislation [Privacy Amendment (Private Sector) Act 2000] has been conducted. Disability	
	issues have been included within the audit and members of the Disability Action Plan Working Group have been consulted as	
1	to specific privacy issues for people with disabilities.	

# Objective 3 – Confidentiality

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

Strategy	Status
<ul> <li>3.1 to 3.5 – Privacy Requirements of new Legislation and relevant ACIF Codes to be implemented</li> <li>As noted, Optus has conducted a comprehensive privacy audit to assess compliance with the new Private Sector Privacy Legislation [Privacy Amendment (Private Sector) Act 2000]. Disability issues have been included within the audit and members of the Disability Action Plan Working Group have been consulted as to specific privacy issues for people with disabilities.</li> <li>Optus is represented on the ACIF Privacy Advisory Group (PAG). The PAG's Terms of Reference and tasks cover all ACIF Codes, Standards and other activities. Disability related privacy issues are to be addressed in this group as required and when issues are raised within the ACIF Codes and other activities.</li> <li>Staff training reviewed to assess its adequacy in informing staff about the specific needs of people with disabilities in relation to privacy. Additional training implemented where required.</li> </ul>	•

# Objective 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

Strategy	Status
<ul> <li>4.1 – Prioritise business and retail premises according to the need for access by people with disabilities</li> <li>Access to business premises prioritised.</li> </ul>	Completed (Ongoing – as new issues identified)
<ul> <li>4.2 to 4.4 – Access audit and implement access strategies as appropriate</li> <li>Automatic door access to front entrance of Melbourne Office installed.</li> </ul>	Completed (Ongoing – as new premises are attained or issues identified)
<ul> <li>4.5 – 4.6 Checklist of requirements for new premises</li> <li>Disability provisions included into the New Facility Assessment Checklist after consultation with Building Code consultancy firm that specialise in disability related provisions.</li> </ul>	Completed
4.7 – Provide information regarding access to premises on Optus website	To be completed
<ul> <li>4.8 – Review of signage used in Optus premises</li> <li>Review and enhancement of signage completed.</li> </ul>	Completed (Ongoing – as new premises are attained or issues identified)
<ul> <li>4.9 – Regular staff training</li> <li>Physical access issues incorporated into staff training programs.</li> </ul>	Completed (Ongoing staff training at regular intervals)

# Objective 5 - Products and Services

To enhance access to Optus products and services

Strategy	Status
5.1 – 5.2 Disability Equipment Policy and Program	In progress, with various actions Completed
<ul> <li>Program implemented for a range of accessible equipment offerings.</li> <li>Further research and scoping of implementation options for expanded accessible equipment offerings for Optus' directly connected and Local Access Resale customers are continuing.</li> <li>TTY Equipment program "soft-launched" mid-2001 (see Appendix A for detailed information).</li> <li>Trials of TTY and volume control equipment solution for Local</li> </ul>	Completed
<ul> <li>Telephony product completed.</li> <li>Select customer trial of the Optus One Touch Display Handset to assess its suitability for a variety of disabilities including: visual, hearing and mobility. Trial customers were required to complete a survey at the end of the trial, indicating their satisfaction with the handset against a number of criteria.</li> <li>Additional equipment trials are currently being undertaken for volume control handsets in response to customer feedback from</li> </ul>	In progress

		1
	initial trial.	
•	Product/information initiatives:	Completed
-	Nokia Loopset available in selected retail outlets;	
-	Deaf/hearing impaired mobile brochure was distributed to (key)	
	Optus World retail outlets during 2001/2002;	
-	CDMA trial phones available; Use of Auslan (Australian sign language) video clip on Optus	
-	website completed. Optus worked closely with Deaf Australia	
	Online II: Centre for Excellence for Students who are Deaf and	
	Hard of Hearing on a project to install Auslan video clips on	
	the Optus Local Telephony website. The Auslan clip provides	
	the hearing impaired/deaf with information on Optus "Project	
	Access" and its equipment solution initiatives.	
•	Implementation of an online bill payment facility on Optus'	
	Retail website. This is available at www.optus.com.au under	
	the "Pay my bill" section.	
5.3	– Staff awareness of Program	Completed (Ongoing as
		further accessible
•	Policy and information included on internal website – including	equipment solutions are
	specific information for customer service staff.	offered)
•	Refresher training provided to customer service staff on Optus'	
	accessible equipment offerings.	
•	Online Disability, Cultural and Linguistic Diversity training	
	module developed which can be viewed by all employees	
	commencing at Optus, as well as existing staff. The module	
	contains specific training, operational and process related information concerning Optus' accessible equipment offerings.	
	As further equipment offerings are launched, updated refresher	
•	training will be provided to relevant staff at regular intervals.	
5.4	-Design Principles	Completed and Ongoing
•	Information gathering on Universal Design Principles has	completed and ongoing
	commenced and as new Optus products are assessed,	
	researched or developed for the residential consumer market,	
	UDPs are factored into the Product Development process for	
	new products/services and include:	
	a) Universal Design Principles	
	b) Disability Impact Statements	
	c) Compliance requirements of disability technical standards	
-		
	- Identify opportunities for research and development under	Completed (Ongoing on
	tus Industry Development Plan	Completed (Ongoing on an annual basis)
	tus Industry Development Plan Optus' Disability Action Plan research and development	
	tus Industry Development Plan Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry	
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Op •	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning	
Op • 5.6	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning preferences and user feedback in relation to Pay TV.	an annual basis)  Completed
Op •	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning preferences and user feedback in relation to Pay TV.  Working Group convened to discuss this matter at an industry	an annual basis)
Op • 5.6	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning preferences and user feedback in relation to Pay TV.  Working Group convened to discuss this matter at an industry level - Optus is participating in this forum.	an annual basis)  Completed
Op • 5.6	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning preferences and user feedback in relation to Pay TV.  Working Group convened to discuss this matter at an industry level - Optus is participating in this forum.  The Australian Subscription and Radio Television Association	an annual basis)  Completed
Op • 5.6	Optus' Disability Action Plan research and development initiatives have been noted in the annual Optus Industry Development Plans.  Optus' Disability Action Plan and associated community/consumer initiatives have been tabled in Optus' annual Environment and Community Report.  — Technical options for Pay TV  Optus participated in a survey regarding closed captioning preferences and user feedback in relation to Pay TV.  Working Group convened to discuss this matter at an industry level - Optus is participating in this forum.	an annual basis)  Completed

investigate ways to expand captioning on pay television in	
Australia.	
All Optus Television commercials are now captioned.	Completed

# 4. Outcomes of the Plan

Previous reviews have noted the difficulties surrounding quantifying certain outcomes of the Plan, although there has been anecdotal evidence of the positive response from external stakeholders, and from an increased number of enquiries from customers and prospective customers. Although limitations exist in quantifying certain outcomes, for reasons which will be discussed below, the following section does quantify various aspects of Optus' progress against three (3) Performance Indicators, namely:

- Low percentage of customer complaints/staff grievances relating to disability matters;
- Increased number of customers with a disability; and
- Continued positive feedback from disability stakeholders with regard to Optus' initiatives for people with disabilities.

# 1) Low percentage of customers complaints/staff grievances relating to disability matters

Customer complaints – Between January 2001 and December 2002, 1124 enquiries about disability-related matters have been recorded, with only 15 complaints received. Optus defines a complaint according to the Australian Communications Industry Forum's (ACIF) definition which is used in the Complaint Handling Industry Code as "any expression of dissatisfaction or grievance made...by a Customer or member of the public... but does not include a request for information". It can be seen that the number of complaints form a very small part of the disability-related customer contact.

Staff grievances - Optus' Human Resources Department have recorded one disability-related grievance over the 24 months from January 2001 to December 2002. This was recently received and is currently being considered. While formal staff grievances remain low, staff have provided feedback for consideration under the Plan such as issues relating to workplace access. This feedback has been used to further guide the implementation of strategies under the Plan.

# 2) Increased number of customers with a disability

Optus is subject to privacy obligations under the *Telecommunications Act* 1997 and the *Privacy Amendment (Private Sector) Act* 2000. To meet its obligations, Optus only collects personal information that is necessary for one or more of its legitimate functions or activities. To date, Optus has not considered it necessary or appropriate to collect information regarding customer's disabilities and hence the number of customers with a disability is not known. As specific products and services are provided for people with disabilities, the need to record information about a customer's disability will be assessed. Despite not having figures to date, it is envisaged that an increasing number of customers with disabilities will utilise our products and services as initiatives under the Action Plan are further implemented, for example as the disability equipment solution is progressed.

# 3) Continued positive feedback from disability stakeholders with regards to Optus' initiatives for people with disabilities

Optus' Disability Action Plan Working Group continues to be actively involved in the development and implementation of the Plan. Optus greatly values the ongoing consultation with the Working Group who help guide the development of the Plan and provide regular constructive feedback about Optus' disability related initiatives. From January 2001 to December 2002, the general feedback provided by the Working Group remained positive. The Working Group has provided constructive feedback and suggestions against progress of some actions under the Plan which have taken longer to achieve than the forecasted timeframes, such as with Optus' range of equipment offerings under the Disability Equipment Program. Members of the Working Group have also acted in "specialist" roles by assisting Optus with, for example, the TTY Program and assessment of specific privacy requirements for people with disabilities. Optus continues to receive positive feedback and recognition of the work on the Plan from a range of stakeholders. This feedback is encouraging and indicates we are meeting our performance indicators.

# Statistical information pertaining to disability-related customer enquiries/complaints

Optus has several customer service systems in which information is recorded regarding both inbound and outbound customer contacts. The information collected in these systems is used for reporting purposes and has allowed us to determine the number of enquiries and complaints received regarding disability related issues. Ongoing analysis of such data will help to ensure that future initiatives under the Plan are tailored to the needs and suggestions of our customers.

Details can be found in Appendix B regarding the breakdown of the enquiries by various classifications. In line with privacy considerations, only limited information has been collected regarding the type of disability the enquiries relate to and all reported data is treated on a strictly anonymous basis.

# **Closing Remarks**

Providing for the needs of people with disabilities is consistent with Optus' core values and with its vision of being an outstanding provider of challenger telecommunications solutions in Australia and the region.

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.

Since the Action Plan was launched in December 1999, Optus has enhanced access for people with disabilities and by doing so has enhanced access for all. However, Optus acknowledges that there is still much more that needs to be done and is committed to the ongoing improvement of access to its products and services for people with disabilities.

# **Further Information**

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

Customer Service	133 066
TTY Access	1800 500 002

Mobile Customer Service 1300 300 937 TTY Access 1800 123 124

or can be lodged in writing to:

Regulatory Affairs Optus 367 Collins St

Melbourne VIC 3000

Complaints lodged via these services will be managed as with other Optus complaints. 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 regarding the Optus Plan or copies of the Plan can be obtained by accessing the Optus website at <a href="www.optus.com.au">www.optus.com.au</a> or by contacting Optus Customer Service on the telephone numbers provided above.

# Appendix A – Disability Equipment Program: Product Trials and Launches

One of the foremost initiatives since the launch of the Plan has been to ensure equitable access to our local telephony service. This has been achieved with the 'soft' launch of our TTY product, and the trial of volume control equipment. Progress with the Disability Equipment Program has required intensive planning, the cooperation of multiple departments within Optus, and collaboration with external groups such as the Australian Communications Exchange (ACE) and the Australian Association of the Deaf (AAD).

Optus' Disability Equipment Program aims to provide a standard telephone service to Optus customers who have a disability. The trial and implementation of certain types of equipment has been prioritised both by feedback from Optus' Disability Action Plan Working Group, and the requirements of Optus' customers.

Optus commenced its TTY trial in April 2001 with a small group of customers in Sydney. Optus technical installation and service staff were trained with the assistance of the Australian Communications Exchange (ACE) and Optus' Consumer Liaison Forum member representing Deafness Forum.

The TTY trial, one of the preliminary initiatives under our broader equipment policy, provided Optus with the opportunity to streamline various processes such as systems modifications, installation and fault management procedures and training activities. Such process changes are likely to be used for other equipment options as they are implemented.

The trial participants included existing Optus customers, as well as new customers sourced specifically for the trial. Two models of TTY handset were trialled (and are now available to customers): the Uniphone 1150 and the Superprint 4425. This ensures that Optus' TTY service caters to the needs of customers with differing requirements.

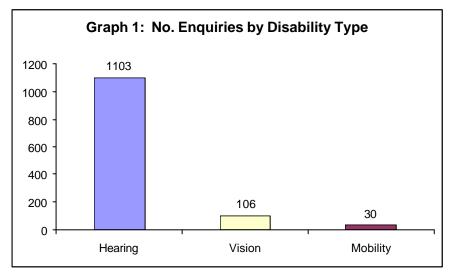
The trial was completed successfully, with the majority of the customers choosing to maintain their Optus TTY service. Based on this, training was undertaken for Optus technical staff in Brisbane and Melbourne, and the service was extended to customers in these cities as well as to additional customers in Sydney.

In mid-late 2001, Optus also undertook a trial of its Caller ID (OneTouch Display) handset for customers with mild to severe hearing impairments, visual impairments and mobility or dexterity impairments. This handset was deemed as a suitable trial handset due to features including an earpiece volume control, internal amplification, handsfree / speakerphone functionality and Caller ID display screen.

Approximately 300 customers trialled the handset and approximately 60% of trial customers found that this handset assisted with their communication needs. For example, elderly customers and customers with impaired dexterity identified that the handset allowed them to enter the number which they wished to dial and view it on the display screen before actually dialling. This assisted them in lowering the number of mis-dialled calls they made. Functions such as this have obvious additional application for customers who suffer dyslexia, or have intellectual impairments.

Although many benefits were identified with the OneTouch Display handset, Optus has chosen to source alternative handsets in the hope of servicing a larger number customers, i.e. in meeting the needs of more than the 60% of customers who found the OneTouch Display handset to suit their needs. To this end, Optus has sought feedback with its Disability Action Plan Working Group on a range of alternate equipment and has been consulting with equipment suppliers. Optus expects to trial additional volume control offerings during 2003.

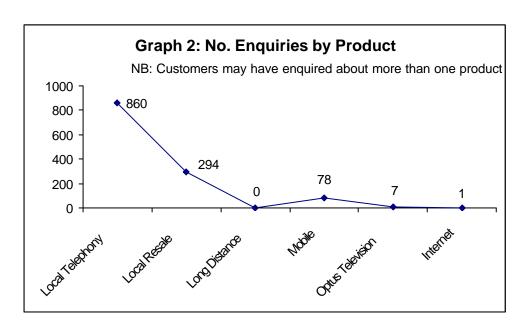
As Graph 1 illustrates, the majority of enquiries received from January 2001 to December 2002 related to hearing impairments, with visual impairments making up the second highest enquires category. This has been the trend over the past few years.



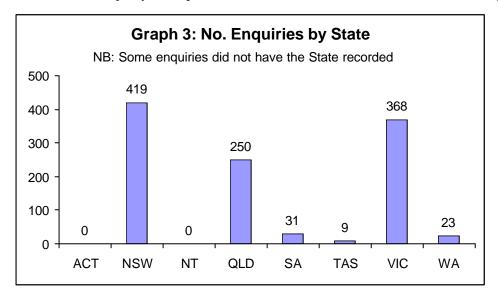
We note that customers may have more than one type of disability, so may raise a variety of "disability type" queries in the one enquiry.

The number of disability related enquiries received by Optus have remained stable, with approximately 40 - 50 enquiries being received each month. This indicates awareness within the company of the procedures to follow when disability related enquiries are lodged, and also continued customer awareness of and interest in our services and products.

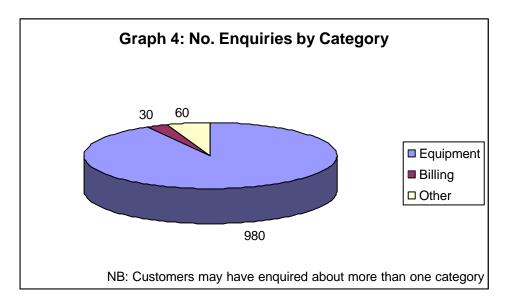
As seen below in Graph 2, the majority of enquiries related to Optus' Local Telephony Product, followed by enquiries about Optus' Local Resale Service.



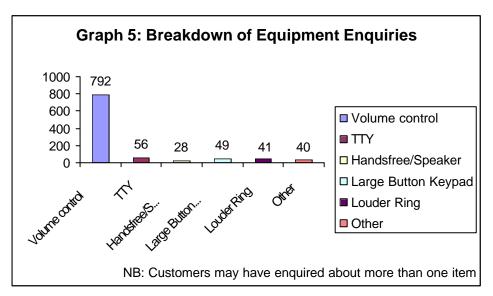
As our Local Telephony network is currently only available in New South Wales, Queensland and Victoria, the majority of enquiries were received from these three states (see Graph 3).



Similar to the figures from 2000, approximately 90% of the enquiries received were regarding equipment solutions (see Graph 4). Approximately one thousand (1000) enquiries were also received regarding Directory Services and the new charging arrangements for calls to this service. Optus introduced special free call arrangements for customers who are unable to read or handle printed directories. The majority of directory service enquires calls were directly attributable to the registration process for free access to the service.



During 2001-2002, a great majority of equipment solutions enquiries concerned the need for a handset with a volume control feature (see Graph 5). The next two highest equipment queries related to TTY equipment (56 enquiries) and the availability of a telephone handset with a large button keypad (49 enquiries).



Ends...