



## Optus Disability Action Plan

### Annual Review

December 1999 - December 2000

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#### Introduction

The following report aims to monitor performance and review progress with the implementation of the Optus Disability Action Plan. The report expands upon the 6 month progress report produced in June 2000. 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. An initial evaluation of progress was conducted in the first 6 months of implementation and this review will further expand upon progress from May to December 2000.

**(ii) Outcomes of the Plan**

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

<i>Performance Indicator 1.</i>	Low percentage of customer complaints/staff grievances relating to disability matters
<i>Performance Indicator 2.</i>	Increased number of customers with a disability
<i>Performance Indicator 3.</i>	Continued positive feedback from disability stakeholders with regards to Optus' initiatives for people with disabilities.

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

## 1. Background

The Optus Disability Action Plan was launched in December 1999. The Action Plan aims to remove barriers to access for customers, potential customers and staff and is consistent with the Optus corporate values of 'Respect for the Individual', 'Customer Focussed' and 'Performance Driven'.

The Action Plan was developed in consultation with a Working Group comprising disability representatives of the Optus Consumer Liaison Forum. Organisations represented on the Working Group are Blind Citizens Australia, Deafness Forum and Tasmanians with Disabilities. Liaison with the Australian Association of the Deaf also occurred with regards to the implementation of specific strategies for customers who are deaf. Not only did the Working Group provide guidance on the development of the Action Plan but have also played an active role in advising on the implementation of strategies and in the monitoring of progress.

The Optus Disability Action Plan has been included on the Human Rights and Equal Opportunity Commission's (HREOC) Register of Disability Action Plans. It has been

recognised by the UK Employers' Forum on Disability as a model of best practice and has been received positively by disability groups within Australia.

***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. 12 Month Summary of Progress (Implementation of strategies)**

The following matrices summarise progress with the implementation of strategies against each of the targets of the Plan. They demonstrate that implementation of strategies is on target with key priorities of the first and second phase of the Plan having been achieved. In meeting targets, it is considered that the implementation of the Plan is achieving the aim of removing barriers to access and has achieved an increased 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 guide the implementation of the Plan.

One of the key initiatives implemented under the Plan has been the progress made towards the introduction of a disability equipment solution to ensure equitable access to Optus Local Telephony products. While it was envisaged that a TTY equipment option would have been available within 12 months, the additional time taken to fully understand customer needs; modify internal procedures; and to trial options will ensure a quality solution for customers.

Other initiatives have already demonstrated the benefit of removing barriers to access for people with disabilities. For instance, additional forms of identification now mean that customers with a disability can meet identification requirements to connect to Optus' products and services. The relaunch of our TTY customer service has ensured that people who are hearing impaired, deaf or speech impaired have ready access to information and to an avenue for feedback. The launch of the Short Message Service (SMS) across the Optus, Vodafone and Telstra mobile networks has been one of the most significant initiatives in removing barriers to access to mobile telephony. The trial and future release of the Braille Bill and the recent implementation of online bill payment facilities ensure that people who are blind or sight impaired have access to accessible billing options. Changes to the workplace, such as the modification of hot water dispensers are ensuring that employees with a disability have equitable access to facilities within the workplace.

Optus has welcomed feedback on the implementation of initiatives under the Action Plan. As previously mentioned, such feedback is used to monitor and guide the implementation of

strategies. It has been particularly pleasing to have received positive feedback on initiatives under the Action Plan from customers with a disability; from organisations representing people with disabilities and from Government.

While anecdotally there is evidence that the Action Plan is being received positively by external stakeholders; that it has resulted in an increase in enquiries from customers; and that it is generating interest and action within Optus, it is difficult to quantify such outcomes at this stage. Despite the difficulties surrounding provision of quantitative data after only 12 months, an initial assessment of outcomes against Key Performance Indicators has been included in Section 4 of this review.

The first 12 months of implementation has seen resolution of some long standing issues for the disability sector. The continuation of such positive progress over the next 12 months will ensure increasing benefits not only for people with disabilities but for our customers and employees.

### ***Focus of Implementation – December 1999 to December 2000***

Implementation of strategies in the first 12 months of the Disability Action Plan has focussed on the following:

#### Internal awareness

- Establishment of an internal specialist contact point for all disability enquiries – particularly for use by Customer Service Representatives
- Implementation of an Internal Communications program to ensure staff are aware of the Disability Action Plan and contact point for enquiries
- Ensuring awareness within the mobile business of disability issues to ensure benefits for all customers from solutions such as SMS across the network and CDMA trial phones within retail outlets
- Raising awareness amongst retail outlets of disability issues
- Ensuring disability issues are taken into account when implementing strategies to achieve compliance with privacy requirements

#### Equipment

- Ensuring TTY customer service operational and effective
- Progress towards implementation of an equipment solution for the Optus Local Telephony product, including the CLASS (volume control) handset trial and the TTY Trial (Refer Appendix A for more information on the TTY trial)
- Development of Equipment Solutions site on Optus' retail and Optus Local Telephony Website to inform customers of the TTY Trial. This site incorporates an Auslan video clip being trialled by Centre of Excellence for Students who are Deaf and Hard of Hearing (NMIT) and Centre for International Research on Communication and Information Technologies (RMIT)
- Ensuring the TTY number is printed on customer information including the phone bill

#### Websites

- Ensuring updates to Websites take account of International Accessibility Guidelines

#### Billing

- Availability of information in alternative formats – including Optus Welcome Kit in Braille and finalisation of DAP in large print and audio formats
- Implementation of strategies to address the identified gaps in information needs, including trialling of Braille and Electronic Bill with selected external participants and employees
- Implementation of an online bill payment facility on Optus' Retail website

Access

- Resolution of major access issues in Optus Centre Melbourne, particularly progress towards the modification of the wheelchair access at the building entrance
- Scoping of access opportunities for retail outlets and provision of information to customers/potential customers regarding access

Identification

- Ensuring Primary and Secondary Forms of Identification are appropriate to customers with a disability, including addition of Disability Support Pension Card and Blind Citizen's Australia Card (and consideration of other options as appropriate)

IVRs

- Reviewing the accessibility of current Interactive Voice Response (IVR) systems
- Ongoing assessment of IVRs against Australian Standard (AS/NZS 4263:1997)

***Focus of Implementation – December 2000 to December 2001***

The key focus of Implementation for the period 1 January to 31 December 2001 includes (not in priority order):

- Assessment of TTY Trial in preparation for broader equipment solution program, including survey of trialists to gauge level of satisfaction with both technical and customer service aspects of the Trial
- Release of equipment solution for the Optus Local Telephony product, including Local Access Resale.
- Implementation of the third phase of internal communications/staff training in parallel with release of broader equipment solution, and/or Braille Bill release
- Development of an online and interactive training module for all new employees covering disability awareness
- Ongoing reward and recognition of customer facing staff displaying excellence in handling specialist/disability enquiries
- Continued awareness raising amongst retail outlets of disability issues; ensuring retail outlets have access to information to provide guidance with regards to key disability issues (eg. Primary Forms of ID; alternative formats for information etc). Optus World outlets to be stocked with a brochure to inform the disability sector of options available with mobile products
- Continued trialling of alternative formats for telephone bills
- Launch of Braille Bill and possible Electronic Bill option for customers
- Continued scoping of access opportunities for retail outlets and provision of information to customers/potential customers regarding access
- Ongoing - ensuring disability issues are taken into account when implementing strategies to achieve compliance with privacy requirements
- Ongoing - ensuring the TTY number is included on relevant customer information
- Ongoing – resolution of major access issues at Optus Centre Melbourne and Sydney
- Additional staff training in Website accessibility. Ongoing evaluation of Optus Websites against Website Accessibility Guidelines developed from International Guidelines
- Implementation of OneTouch/CLASS handset trial to assess functionality and compatibility of equipment against a range of disabilities, including sight, hearing and mobility impairments
- Scoping opportunities for evaluating customer satisfaction of Optus' telecommunications services for customers with disabilities

**3. Progress with the Implementation of Strategies**

**Objective 1 - Corporate Culture**

- To achieve a responsive anti-discriminatory culture

<b>Strategy</b>	<b>Status</b>
<p>1.1 – Internal Communications</p> <ul style="list-style-type: none"> <li>• Internal communications initiative implemented at launch of DAP, including: <ul style="list-style-type: none"> <li>- video broadcast to all staff</li> <li>- inclusion in staff newsletter</li> <li>- email to all staff</li> </ul> </li> <li>• Ongoing communications initiatives: <ul style="list-style-type: none"> <li>- inclusion in staff newsletter</li> <li>- email to staff raising awareness levels of disability matters and the Plan</li> <li>- 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 annual reviews.</li> </ul> </li> <li>• Implementation of motivational speaker program to raise awareness of Disability Discrimination Act (DDA) and the Plan</li> </ul>	<p>Completed</p> <p>Ongoing</p> <p>To commence</p>
<p>1.2 – Employee Training</p> <ul style="list-style-type: none"> <li>• Disability Training Video produced and screened to all staff</li> <li>• Disability Issues included in induction program for Customer Service Staff</li> <li>• Procedure for logging disability queries introduced for Customer Service Staff</li> <li>• Disability awareness training for other targeted staff to commence in parallel with equipment solution including: <ul style="list-style-type: none"> <li>- use of video as key element</li> <li>- use of intranet “online” training modules regarding equipment solutions</li> <li>- expansion of equipment solutions website detailing regulatory, marketing and policy issues</li> <li>- development of disability specialists in centralised customer service/regulatory areas, including specialist privacy officer to handle disability related privacy queries</li> <li>- personalised training/feedback is provided to staff who raise specific questions relating to disability matters</li> <li>- regular bulletin notices issued to relevant staff</li> </ul> </li> <li>• Online Disability and Cultural Diversity training module to be developed which is interactive and viewed by all employees starting at Optus. This not only includes employees commencing in customer facing roles, but all new employees starting their employment with the company.</li> </ul>	<p>Completed</p> <p>Ongoing (various actions completed at regular intervals)</p> <p>To commence</p>
<p>1.3 – Reinforce Positive Behaviour</p> <ul style="list-style-type: none"> <li>• Disability responsiveness, as demonstrating Corporate Core Values introduced into Melbourne Call Centre quarterly Reward and Recognition program in Dec 99</li> <li>• TTY Customer Service Staff member received corporate recognition for excellence in customer service with article featuring recognition in staff newsletter</li> <li>• Corporate ‘True Life’ award presented to the Coordinator in the</li> </ul>	<p>Completed</p>

<p>Billing team of the alternate bill format project</p> <ul style="list-style-type: none"> <li>• Customer Service Disability Specialist seconded to Regulatory Division to cross train and expand their knowledge of the DDA and various legal and regulatory matters</li> <li>• Performance and Development Review feedback provided to line managers in recognition of excellence displayed by staff handling disability related matters</li> <li>• Implementation of other initiatives to coincide with introduction of equipment program, including: <ul style="list-style-type: none"> <li>- identification of customer service excellence in disability related matters</li> <li>- disability responsiveness, as demonstrating Corporate Core Values to be nominated for internal achievement awards</li> </ul> </li> <li>• Development of Reward and Recognition program for Sydney call centres to acknowledge demonstration of Corporate Core Values</li> </ul>	<p>Ongoing</p> <p>Completed</p>
<p>1.4 – Employer Responsibility:</p> <p>1.4.1 – Review of EEO policy</p> <ul style="list-style-type: none"> <li>• Affirmative Action Policies reviewed and considered consistent with aims of Action Plan</li> </ul> <p>1.4.2 – Updating of EEO procedures</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• November 2000 monitoring of EEO procedures and Affirmative Action Policies completed</li> </ul> <p>1.4.3 – Review of OH&amp;S procedures</p> <ul style="list-style-type: none"> <li>• OH&amp;S Policies reviewed and considered consistent with aims of Action Plan</li> </ul> <p>1.4.4 – Identification and Resolution of specific OH&amp;S issues</p> <ul style="list-style-type: none"> <li>• Action on specific issues, including: <ul style="list-style-type: none"> <li>- Hot water dispensers in kitchens of Preston and in Optus Centre Melbourne modified to ensure equitable access</li> <li>- Emergency/evacuation procedures reviewed and considered consistent with needs of people with disabilities</li> <li>- Need for automatic door access to front entrance of Melbourne Office has been tabled with Building Management. Building Management have advised that work to resolve this issue is to be undertaken within 6 months. Confirmation received by Colliers Jardine Property Management that an auto sensor sliding style door will replace current disabled access door. In addition, refurbishment plans have been submitted to also remove the rear entrance revolving door and two swing doors and replace these with an auto sensor sliding door.</li> </ul> </li> <li>• Close working relationship established between Regulatory, Building Mgt and OH&amp;S Officer to ensure issues proactively resolve. Similar model has been established in Sydney premises</li> </ul>	<p>Completed</p> <p>Ongoing (this action is completed at regular intervals)</p> <p>Completed</p> <p>Ongoing</p>
<p>1.5 – Externally Focussed</p> <p>1.5.1 – Monitor work in international forums relating to disability</p>	<p>Ongoing</p>

<p>matters</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• General monitoring of international activities occurring via media, disability and other network</li> <li>• Optus Regulatory staff regularly attend external disability workshops, exhibitions, and industry meetings to keep abreast of both national and international developments</li> <li>• 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</li> <li>• 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</li> </ul> <p>1.5.2 – Build strong links with parent company (Note: Possible ownership changes may redirect this building of international links to other entities).</p> <ul style="list-style-type: none"> <li>• Optus represented on International parent company Discussion Group into Disability Issues</li> <li>• Update on Plan provided to parent company for world@work to accompany a story about the parent company's new diversity policy</li> </ul>	Ongoing
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### ***Objective 2 - Accessible Communications***

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

<b>Strategy</b>	<b>Status</b>
<p>2.1 – Information Needs Identified</p> <ul style="list-style-type: none"> <li>• Matrix of information needs developed in consultation with DAP Working Group.</li> </ul>	Completed
<p>2.2 – Review existing methods/identify gaps</p> <ul style="list-style-type: none"> <li>• Gaps identified and prioritised in consultation with DAP Working Group.</li> </ul>	Completed
<p>2.3 – Implement strategies to address gaps</p> <ul style="list-style-type: none"> <li>• Input from disability sector and International Accessibility Guidelines (WC3) incorporated into design of Corporate <b>Website</b>. Corporate Website recognised as one of most accessible in Australia by HREOC study</li> <li>• Draft Internal Website Accessibility Guidelines developed from International Guidelines</li> <li>• Retail website reviewed with Accessibility Guidelines being taken into account</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 Video/audio</li> <li>• Additional staff training in Website accessibility by specialist trainer. Ongoing evaluation of Optus Websites against Website Accessibility Guidelines developed from International</li> </ul>	<p>Completed</p> <p>To commence</p>









<p>Auslan video clips on the Optus Local Telephony website. The current Auslan clip provides the hearing impaired/deaf with information on Optus “Project Access” and its equipment solutions initiatives.</p> <ul style="list-style-type: none"> <li>• Implementation of an online bill payment facility on Optus’ Retail website</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 will be required to complete a survey at the end of the trial, indicating their satisfaction with the handset against a number of criteria.</li> </ul>	In Progress
<p>5.3 – Incorporation into Universal Design Principles</p> <ul style="list-style-type: none"> <li>• Information gathering on UDP has commenced</li> <li>• consideration of current Optus products/services which meet UDP will be considered as part of activity arising from ATIA Industry/Disability Partnership group – in particular, their development of a database of compliant products and those which provide accessible features. ATIA have advised that this project is currently on hold but will keep us informed of progress.</li> </ul>	In Progress To commence
<p>5.5 – Technical options for Pay TV</p> <ul style="list-style-type: none"> <li>• Information gathering has commenced on regulatory requirements and user feedback as to preferences for closed captioning options for Pay TV</li> <li>• Closed captioning consumer survey to be conducted to identify, for example, what type of programming consumers would most like to see captioned on Pay TV (e.g. Movies, News, General Entertainment, Family ); what time of day consumers most like to see captioned (e.g. Morning, Afternoon, Evenings)</li> </ul>	In progress

#### 4. Outcomes of the Plan

The 6 month progress report noted that it was difficult to quantify certain outcomes of the Plan, although there was anecdotal evidence of the positive response from external stakeholders, and from an increased number of enquiries from customers. Although quantifying our progress against the Plan remains a difficult task for reasons which will be discussed below, the following section does quantify certain aspects of our 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 – Optus commenced classifying disability-related enquiries from customers and potential customers in June 2000. Since that time, 262 enquiries have been recorded, with only 9 registered as complaints. 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*". From June to December 2000, a very low percentage of disability related complaints (approximately 3.5% of all disability-related customer contact) have been received.

Staff grievances – Optus' Human Resources Department have recorded no disability-related grievances over the 12 months from December 1999 to December 2000. While formal staff grievances have not been received, staff have provided feedback for consideration under the Plan such as issues relating to workplace access.

## **2) Increased number of customers with a disability**

Optus has privacy obligations under the *Telecommunications Act 1997*, ACIF Protection of Personal Information of Customers of Telecommunications Providers Industry Code, and the new *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 nor appropriate to collect information regarding customers' 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.

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

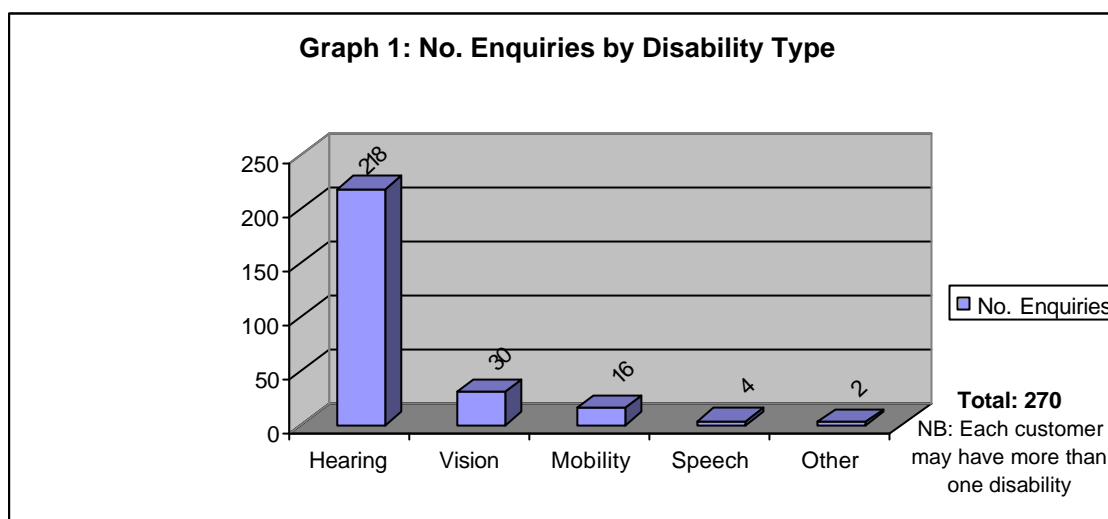
Optus' Disability Action Plan Working Group has been actively involved in the development and implementation of the Plan. We greatly value the ongoing consultation with the Working Group who will assist in further guiding the Plan. From December 1999 to December 2000, the general feedback provided by the Working Group has been extremely 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. Members of the Working Group have also acted in "specialist" roles by assisting Optus with, for example, the TTY Trial, and development of training packages for our customer facing staff. Optus' work on the Plan and related actions has received recognition both nationally and internationally as best practice. 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.

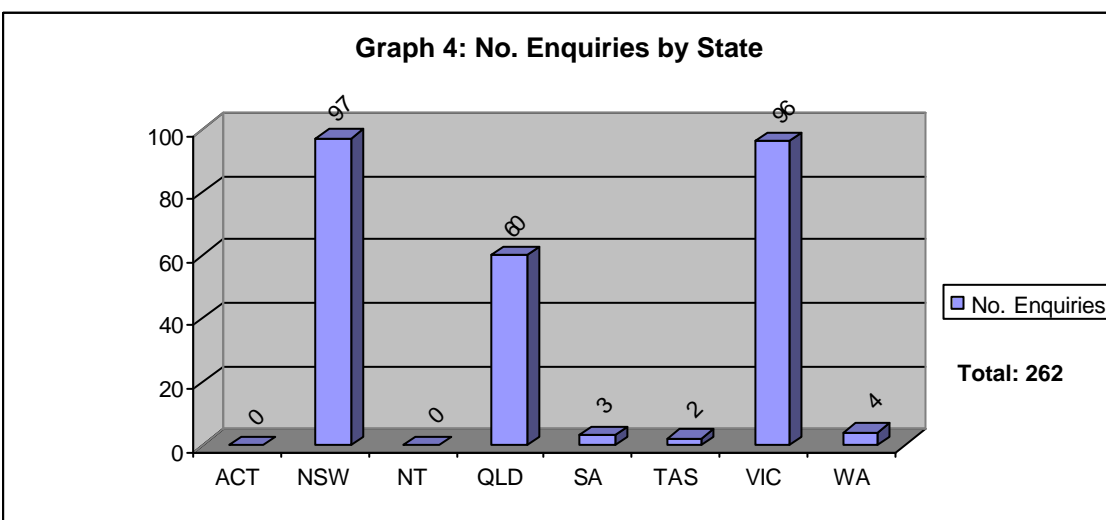
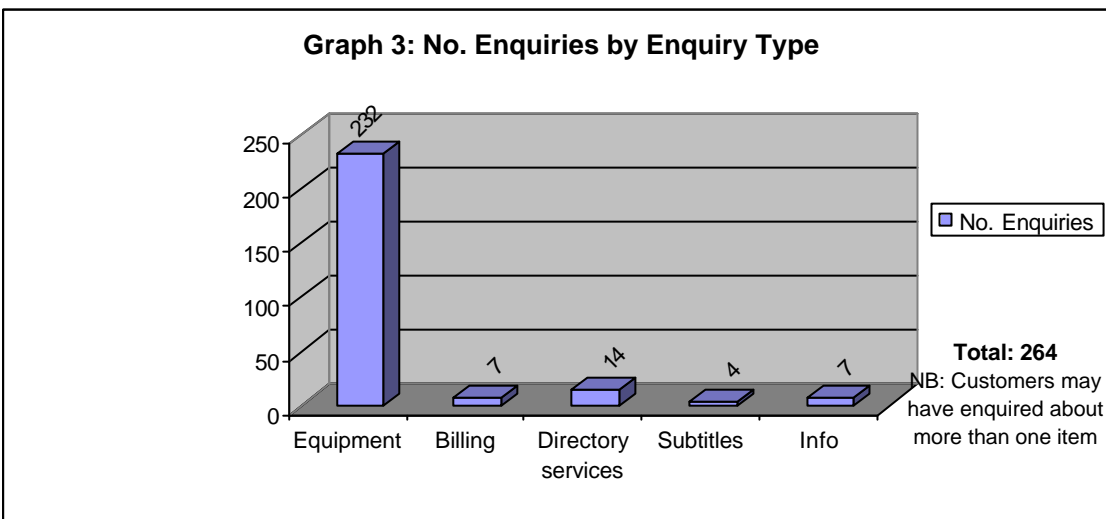
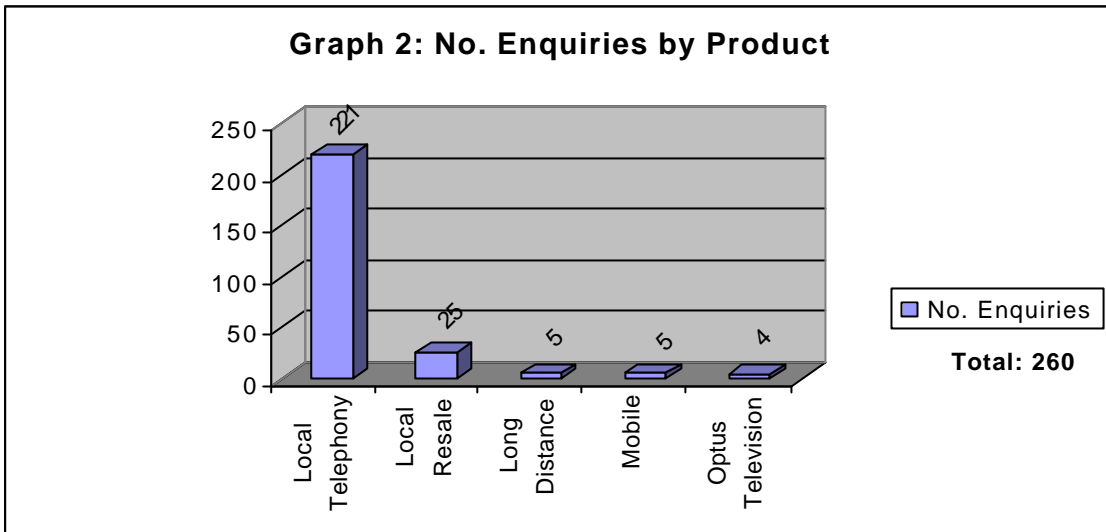
Details can be found below regarding the breakdown of the enquiries by various classifications. In line with privacy considerations, only limited information has been collected regarding the type of disability the enquiries are about and all reported data is treated on a strictly anonymous basis.

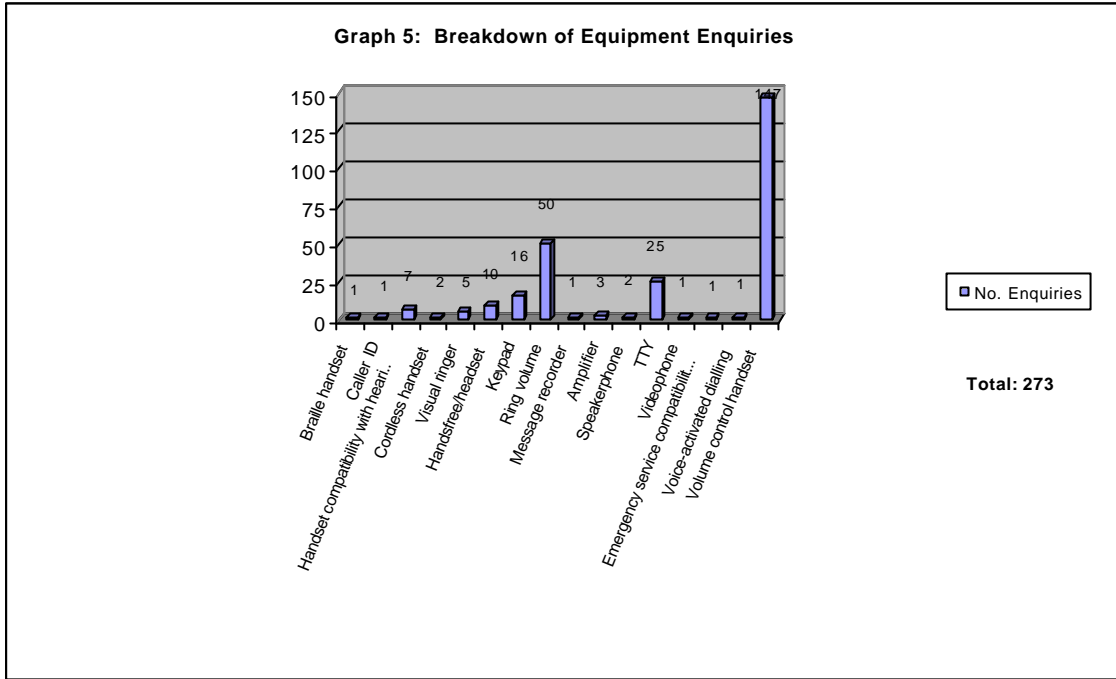
As Graph 1 illustrates, the majority of enquiries received from June to December 2000, related to hearing impairments, with visual impairments making up the second highest enquiry category.



The number of disability related enquiries received by Optus has been gradually increasing each month since reporting commenced – registering with 21 enquiries in June 2000 to 40 in December 2000. This steady increase indicates an increased awareness within the company of the procedures to follow when disability related enquiries are lodged, and also possibly an increased customer awareness of our services and products.

As seen in Graph 2, the majority of enquiries related to Optus' Local Telephony Product. 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 4). Approximately 88% of the enquiries received were regarding equipment solutions, with just over half of these (147 enquiries) concerning the need for a handset with a volume control feature (see Graph 5). The next two highest equipment queries related to a louder ringing volume (50 enquiries) and availability of TTY equipment (25 enquiries).





Ends...

## Appendix A – TTY Trial

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 launch of our TTY Trial. The trial 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). The TTY trial aims to provide a standard telephone service to directly connected Optus customers who are deaf or have a hearing or speech impairment.

The trial, which is one of the preliminary initiatives under our broader equipment policy, is being conducted 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.

A summary of the TTY trial is as follows.

- Prospective trial participant details received from AAD, ACE and customers who had previously contacted Optus with expressions of interest.
- Serviceability check conducted to establish whether participant's home address is serviceable by the Optus local telephony network and prospective trialists advised of the outcome.
- Installations organised in consultation with the trial participants, and completed by specially trained Customer Service Technicians.
- Courtesy call made 1 to 2 weeks after the installation by Optus' TTY Customer Service and the Customer Relations Group to ensure the service is working well, and to answer any potential queries.
- Trial to run for a period of 8 – 12 weeks dependent on phasing of installations.
- Survey distributed to trial participants to collate feedback regarding the trial, which includes questions relating to the installation process, the level of Customer Service experienced, the operability of the TTY equipment on the Optus network and suggestions for moving forward.
- For their assistance in the trial, participants have been offered the free installation of a Optus local cable telephone line, a free TTY handset for the duration of the trial, free telephone line rental and a 15% discount on calls made using Optus' network.

Specific procedures have been developed and implemented to support the trial such as:

- training for Customer Service, Customer Fault Management, Telemarketing, Installation and Fault Repair staff. Specialised training has been provided by Printacall and has included information on communicating with the deaf and hearing/speech impaired;
- testing of the TTY handsets on our network to ensure that they are fully functional and that the new text-based emergency services number can be accessed from TTYs on our network;
- trialling of alternative methods for contacting customers such as by SMS on their mobile, by fax, via our TTY Customer Service or the National Relay Service, and via email;
- providing specialist points of contact for the customers on the trial; and
- ensuring that all Customer Fault Management staff have sufficient knowledge about the TTY equipment in order to resolve any problems which may arise.