



DISABILITY ACTION PLAN

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SECTION 1 - CONTEXT

INTRODUCTION

Optus is Australia's second largest telecommunications company. With over 8000 employees, Optus has grown rapidly since its establishment in 1992.

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

Our Aim

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

Our Vision and Values

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

- respect for the individual** – Optus meets the challenge of finding a balance between the concerns of customers and the community and the need meet shareholder expectations
- customer focused** – Optus' focus is on satisfying and exceeding customer expectations
- performance driven** – Optus is committed to finding new opportunities to achieve leadership in communications.

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

Our Commitment

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

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

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

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

LINKS TO THE DISABILITY DISCRIMINATION ACT AND INDUSTRY PROCESSES

Disability Defined

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

Disability means

- (a) total or partial loss of the person's bodily or mental functions; or
- (b) total or partial loss of a part of the body; or
- (c) the presence in the body of organisms causing disease or illness; or
- (d) the presence in the body of organisms capable of causing disease or illness; or
- (e) the malfunction, malformation or disfigurement of a part of the person's body; or
- (f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgement or that results in disturbed behaviour;

and includes a disability that:

- (h) presently exists; or
- (i) previously existed but no longer exists; or
- (j) may exist in future; or
- (k) is imputed to a person.

The Australian Bureau of Statistics currently estimates that 3.6 million Australians have a disability, representing 19% of the population. This is predicted to increase steadily as the proportion of the aged in the community increases, currently 54% of people over 65 years of age has a disability.*

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

* *Disability, Ageing and Carers: Summary of Findings, Australian Bureau of Statistics 1999*

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 and adjust the volume of the phone according to the tone and volume of the other person's voice
- being able to see the non standard enhanced call handling features on a telephone handset
- accessing a retail premise to purchase a 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

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

Disability Action Plans

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

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

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

Industry Codes and Standards

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

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

DEVELOPMENT OF THE PLAN

Consultation

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

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

Guiding Principles

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

In implementing the Plan, Optus will focus on achieving **accessibility**.

In implementing the Plan's strategies, Optus will strive to achieve **integration** of the needs of people with disabilities with current Optus employment and business objectives.

In implementing and reviewing the Plan, Optus will commit to a process of **ongoing consultation**.

Where the retrofitting of current practices/products is inefficient, Optus will adopt a **future focus**.

Monitoring and Evaluation

This Plan is considered an evolving process with regular monitoring and review to be conducted. The document will reflect these reviews, with past, present and future actions to be recorded.

Performance will be monitored and evaluated in two ways:

(i) Implementation of Strategies

The implementation of the Plan will be monitored against the timeframes identified for each strategy. An initial evaluation of progress was conducted in the first 6 months of implementation and on an annual basis following that.

(ii) Outcomes of the Plan

The efficacy of the Plan in achieving the Key Outcomes will be 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. |

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

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

SECTION 2 - OBJECTIVES AND STRATEGIES

SUMMARY OF KEY OBJECTIVES

- 1. Corporate Culture**
To achieve a responsive anti-discriminatory culture.
- 2. Accessible Communications**
To improve accessibility to information about Optus' products and services.
- 3. Confidentiality**
To ensure that privacy and confidentiality is maintained in the handling of customer and employee personal information.
- 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.
- 5. Products and Services**
To enhance access to Optus products and services.

SUMMARY OF IMPLEMENTATION PHASES

Phase 1 July 1999- December 1999

Phase 2 January 2000- June 2000

Phase 3 June 2000 - February 2001

Phase 4 January 2001 - January 2002

Phase 5 January 2002 - January 2003

Phase 6 January 2003 - January 2004

Further phases are to be identified during the review of the Plan in November 2004.

OBJECTIVE 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 disability representatives will be used as a key component of the strategies to influence Optus Corporate Culture. This may include, for example, disability representatives to develop and deliver components of the internal communications/training program.

STRATEGIES		RESPONSIBILITY	TIMELINE
1.1	<p>Internal Communications Implement an ongoing Staff Communications program to ensure:</p> <ul style="list-style-type: none"> (i) the Plan is well understood and is readily integrated into all aspects of Optus' business (ii) the visibility of outcomes of the Plan to reinforce positive attitudes towards people with disabilities 	Human Resources - Internal Communications Division	Phase 1 Complete Ongoing Staff Communications at regular intervals
1.2	<p>Employee Training Implement an induction and ongoing training program to ensure staff are equipped and confident to respond to the needs of people with disability. Training to be tailored to the needs of various areas of the company, including:</p> <ul style="list-style-type: none"> • Customer Facing Staff (including customer service representatives, Community Selling) • Product planning • Marketing • Human Resources • Management 	Human Resources	<p>Phase 1 Complete</p> <ul style="list-style-type: none"> • Training materials developed • Materials implemented into Optus induction program • Training program implemented for customer facing staff <p>Phase 2 Complete</p> <ul style="list-style-type: none"> • Training program implemented for: <ul style="list-style-type: none"> (i) Human resources (ii) Product planning (iii) Marketing (iv) Management <p>Ongoing Employee Training at regular</p>

STRATEGIES		RESPONSIBILITY	TIMELINE
			intervals
1.3	Reinforce Positive Behaviour		
1.3.1	Incorporate disability awareness / responsiveness in Reward and Recognition programs.	Human Resources	Phase 2 Complete
1.4	Employer Responsibility		
1.4.1	Review current strategies to achieve compliance with EEO requirements regarding people with disabilities.	Human Resources Corporate Division	Phase 1 Complete Reviewed at two-yearly intervals or as necessary
1.4.2	Develop and implement strategies, where required, to enhance non-discriminatory practices of EEO policy/procedures.	Human Resources Corporate Division	Phase 2 Complete
1.4.3	Review current strategies to achieve compliance with OH&S requirements regarding people with disabilities.	Human Resources	Phase 1 Complete Reviewed at two-yearly intervals or as necessary
1.4.4	Develop and implement strategies, where required, to enhance non-discriminatory practices of OH&S policies/procedures. In particular, ensure the needs of employees with disabilities are taken into account in safety drills such as fire / evacuation procedures.	Human Resources	Phase 2 Complete
1.5	Externally focused		
1.5.1	Monitor work in international forums relating to disability matters.	Internal Plan Group	Ongoing
1.5.2	Build strong links with Singtel to share information about disability related matters and to gain knowledge of other companies' experiences to input Optus' Plan.	Internal Plan Group	Ongoing

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

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

This objective has two dimensions:

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

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

STRATEGIES		RESPONSIBILITY	TIMELINE
2.1	<p>Identify the information needs of people with disabilities who are:</p> <ul style="list-style-type: none"> • customers, or • employees of Optus, or • members of the public who communicate with Optus. <p>It is noted that information needs may be broader than alternative formats, for example, it may include the need for access to information by an authorised third party, such as a customer advocate.</p>	Regulatory Affairs	Phase 1 Complete
2.2	<p>Review existing methods of communication and identify any gaps in information needs, including:</p> <ul style="list-style-type: none"> • Review Optus website in accordance with HREOC / international guidelines and address any identified shortcomings. • Evaluate current TTY service, including 	Regulatory Affairs and other areas of business as required	<p>Phase 1 Complete Review of website Ensure TTY access</p> <p>Phase 2 Complete Identify other gaps</p>

	STRATEGIES	RESPONSIBILITY	TIMELINE
	<p>staff expertise, location of TTY machines and advertising of TTY number.</p> <ul style="list-style-type: none"> • Evaluate current use of automated voice recognition for use by hearing impaired. • Evaluate current use of IVR for use by hearing impaired. 		
2.3	<p>Develop and implement strategies to address the gaps and improve existing methods of communication, where needed Examples include:</p> <ul style="list-style-type: none"> • ensure that advertising messages are in both spoken and written forms. • evaluate the need for subtitles on advertisements or internal videos. • where public meetings are held, hearing loops and interpreters may be required. • where meetings with individuals are held, there may be a need for an interpreter and/or an advocate of that person’s choice. • ensure that automated voice recognition systems are accessible to hearing impaired. 	Relevant areas of business	Phase 2 Complete Ongoing implementation of strategies as communications developed
2.4	<p>Review the adequacy of Optus’ third party access policy for providing information access for people with disabilities and revise as appropriate.</p>	Regulatory Affairs	Phase 2 Complete
2.5	<p>ACIF Codes Develop and implement compliance programs for disability related provisions of ACIF Codes, which have regard to information provision, to which Optus becomes a signatory, for example:</p> <ul style="list-style-type: none"> • Credit Management • Complaint Handling Code 	Regulatory Affairs	Phase 2 & 3 Complete Ongoing as Codes are finalised

OBJECTIVE 3 - CONFIDENTIALITY

To ensure that:

- information is only requested from customers, potential customers and employees which is essential to the business relationship between the customer/employee and Optus; and
- Optus' information-handling procedures, including use and disclosure of information, have due regard to relevant privacy considerations.

STRATEGIES		RESPONSIBILITY	TIMELINE
3.1	Identify specific needs of people with disabilities with regards to compliance with privacy requirements, including: (i) <i>Telecommunications Act 1997</i> and <i>Privacy Act 1988</i> (ii) <i>Telecommunications (Consumer Protection and Service Standards) Act 1999</i> (iii) <i>Privacy Amendment (Private Sector) Act 2000</i> (iv) <i>ACIF Customer Personal Information Code</i>	Regulatory Affairs	Phase 2 Complete
3.2	Ensure that Optus' compliance with privacy requirements addresses needs of people with disabilities who are Optus customers and staff.	Regulatory Affairs Legal	Phase 2 Complete
3.3	In reviewing Optus' third party access policy (refer to 2.4), ensure that privacy considerations are taken into consideration in the need for information access by people with disabilities.	Regulatory Affairs	Phase 2 Complete
3.4	Review staff training for its adequacy of informing staff about the specific needs of people with disabilities in relation to privacy and implement additional training where required.	Human Resources	Phase 2 Complete Ongoing as needed
3.5	Implement a review process to ensure the needs of people with disabilities are addressed in Optus' compliance programs with future privacy requirements, eg. in particular with Privacy Legislation.	Regulatory Affairs	Phase 3 Complete Ongoing as Optus' Privacy compliance program is reviewed

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 and hinder their safety.

The physical environment encompasses the following areas:

- (i) Optus workplace premises (predominantly buildings in major capital cities of Australia);
- (ii) Optus construction sites, including mobile phone base stations and installation of 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 which are covered under this objective include -

- (a) 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

STRATEGIES		RESPONSIBILITY	TIMELINE
4.1	Prioritise Optus business and retail premises according to the need for access by people with disabilities.	Corporate Property	Phase 1 Complete
4.2	Conduct an access audit into: <ul style="list-style-type: none"> • the main business premises of Sydney and Melbourne to identify immediate access issues • other high priority premises, as identified by 4.1 	Corporate Property	Phase 1 Complete
4.3	Where premises not owned by Optus, inform landlords/building managers of any issues identified in the audits and encourage immediate and longer term issues to be addressed.	Corporate Property	Phase 1 Complete Ongoing as new premises are attained
4.4	Where premises are owned by Optus, implement access strategies as appropriate.	Corporate Property	Phase 2 Complete

STRATEGIES		RESPONSIBILITY	TIMELINE
4.5	Include access issues for people with disabilities within checklist of requirements against which potential new Optus premises/sites are assessed.	Corporate Property	Phase 1 Complete
4.6	Include a statement noting the need for compliance with the disability provisions of the Building Code of Australia within: <ul style="list-style-type: none"> • the Optus Building Standards Manual; • Optus World agreements/Operating Manuals; and • Optus Dealership Operating Manuals. 	Corporate Property	Phase 2 Optus Building Standards Manual Complete Phase 5
4.7	Provide information regarding access to premises on the Optus website.	Corporate Property	Phase 5 & 6 & as access is provided
4.8	Review signage used in Optus premises against industry best practice, with the aim of enhancing communication regarding access and information for people with disabilities. For example, signage regarding wheelchair access, location of facilities, disabled parking, hearing access/TTY access.	Corporate Property	Phase 2 Complete Ongoing as signage is added or reviewed
4.9	Incorporate physical access issues within staff training programs to increase staff awareness of access issues for people with disabilities, ie. to avoid inadvertent removal of signage etc.	Human Resources	Phase 1 & 2 Complete

OBJECTIVE 5 - PRODUCTS & SERVICES

To ensure that Optus' products and services are as accessible as possible to people with disabilities.

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

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

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

- local and long distance telephony
- mobile telephony
- internet

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

STRATEGIES		RESPONSIBILITY	TIMELINE
5.1	Develop and implement an Optus disability equipment policy	Regulatory Affairs/Local Telephony	Phase 1 Complete
5.2	Develop and implement an Optus Disability Equipment Program to include such offerings as: TTY and Volume Control Phone.	Regulatory Affairs Local Telephony Engineering Relevant areas of the business	Phase 4 & 5 Ongoing
5.3	Ensure customer facing staff are aware of Optus' disability equipment policy.	Customer Service	Phase 1 Complete
5.4 5.4.1 5.4.2 5.4.3	Incorporate the following into the Product Development process for new products/services: Universal Design Principles Disability Impact Statements Compliance requirements of disability technical standards	Local Telephony Engineering Relevant areas of the business	Ongoing
5.5	Identify opportunities for research and development under the Optus Industry Development Plan for disability-related areas.	Government Affairs	Phase 2 Complete
5.6	Consider the technical options for Pay TV.	Consumer and Multimedia	Phase 2 Complete Ongoing exploration of technical options for Pay TV

SECTION 3 - MONITORING AND EVALUATION

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

The following performance indicators will be used to assess the effectiveness of the Plan:

- | | |
|---------------------------------|---|
| Performance Indicator 1. | Low percentage of customer complaints/staff grievances relating to disability matters |
| Performance Indicator 2. | 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. |

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

STRATEGIES	RESPONSIBILITY	TIMELINE
Establish baseline data for assessing performance indicators.	Regulatory	March 2000 Complete
6 month evaluation <ul style="list-style-type: none"> • To monitor progress of implementation • Results reported to CLF and senior management 	Regulatory The Plan Working Group and internal Optus advisory committee	May 2000 Complete
Annual Review <ul style="list-style-type: none"> • Evaluation of the Plan against performance indicators and review/amendment of the Plan as required • Results reported to CLF, senior management and in Optus' Annual Report 	Regulatory The Plan Working Group and internal Optus advisory committee	November each year
Comprehensive Review <ul style="list-style-type: none"> • Evaluation of the objectives and performance indicators of the Plan • Implementation of revised Plan as required 	Regulatory The Plan Working Group and internal Optus advisory committee	November 2004

SECTION 4 - INQUIRIES/COMPLAINTS

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

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.

GLOSSARY

CLF	Consumer Liaison Forum - a tri-yearly forum held with representatives from key national consumer organisations to provide input into Optus policies/procedures as they impact upon consumers
DDA	<i>Disability Discrimination Act 1992</i>
EEO	Equal Employment Opportunities
OHS	Occupational Health and Safety
HREOC	Human Rights and Equal Opportunities Commission
IDP	Industry Development Plan - a plan for the development of industries involved in the manufacture, development or supply of facilities and of research and development activities relating to an industry as required by the <i>Telecommunications Act 1997</i> .
TTY	Telephone Typewriter - a device attached to a telephone line which allows callers to communicate by typing messages which are instantaneously seen by the person at the other end of the line.

Further Information

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

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