

# Telstra's Second Disability Action Plan

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1999 - 2001

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## Section 1 - TELSTRA'S SECOND DISABILITY ACTION PLAN 1999-2001

### INTRODUCTION

Telstra is pleased to be able to present its second Disability Action Plan. The Plan was developed after extensive consultation with national, state and territory consumer and disability representatives. Special focus groups met in several states to discuss and provide input to the Plan. Comments and suggestions were made by members of Telstra's Disability Forum. Telstra expresses its appreciation to all those involved.

Telstra launched its first Disability Action Plan in 1996. The Plan, a first for the telecommunications industry in Australia, was lodged with the Human Rights and Equal Opportunity Commission (HREOC).

Under this first plan, Telstra undertook to commission an independent audit of its performance pursuant to the first plan. Telstra commissioned PricewaterhouseCoopers (PwC) to conduct the audit. Telstra also sought feedback from consumer representatives and the peak bodies representing people with a disability.

The results of the audit were pleasing, with ninety-one percent of the detailed strategies either complete or in progress. Consumer feedback indicated that peak groups were most satisfied with Telstra's consumer consultation and research activities.

Telstra remains committed to the basic principle underlying the Disability Discrimination Act 1992, which is that people with a disability have the same fundamental rights as the rest of the community.

This second Plan builds on our past achievements and outlines eight key strategies including ongoing commitments to enhance disability awareness amongst Telstra management and staff, community consultation as well as improving accessibility to information, products and services. Telstra is especially aware of the benefits that enhanced telecommunications services and products can bring to people with a disability. Telstra recognises the concern with access to online services and has committed to a number of actions to address this concern in the new Plan.

Telstra is proud of the progress it has made to date, and has developed a second Disability Action Plan which promotes the achievements of the first Plan as well as recognising that Australians with disabilities need to share in the benefits from the new communications revolution.

The Telstra Disability Action Plan 1999-2001 demonstrates Telstra's commitment to its customers with a disability in an increasingly challenging and competitive market.

December 1999

## OVERVIEW

Over recent years, the telecommunications industry has experienced extensive and rapid growth. The industry has expanded from a duopoly to one with multiple carriers and carriage service providers. There has been an explosion of new products and services on to the market at the same time as a substantial decrease in costs of basic telephone services.

The way we do business and conduct our daily lives has changed with increased use and availability of the Internet, e-mail and other data services, and the increased mobility afforded by data and voice transfer over the mobile telephony networks.

It is widely recognised that these new telecommunications products and services have the potential to improve living standards for people with a disability.

The benefits of readily accessible telecommunications products include access to employment, opportunities to maintain and create social links, increased independence and a generally increased ability to participate in the broader community.

The disability community represents nearly 19% of the Australian population and is an important customer segment to Telstra as the major supplier of telecommunications services to Australians.

Telstra understands the important role it has to play in assisting people with a disability to fully participate in the opportunities available to them.

Telstra also recognises the need to provide adaptable, flexible and accessible telecommunication products, services and information to people with a disability.

Telstra is the only Australian telecommunications carrier to have a specialist Disability Services Unit. The Unit exists to identify and integrate issues relevant to people with a disability into the broader Telstra Business Planning Process.

The Unit works to promote elimination of discriminatory practices in Telstra, promote and advise on the execution of disability strategies and to ensure accountability for the satisfactory resolution of disability-related issues.

The Unit maintains specialist knowledge of these issues through participation in consumer and representative forums and provides expert advice to Telstra managers and their staff, ensuring that Telstra's corporate disability policy remains relevant to the needs of people with a disability.

While Telstra acknowledges its legal and social obligations to comply with the Disability Discrimination Act (DDA), the preparation of the Disability Action Plan is not only a response to these obligations. There is a strong business imperative supporting the need for the Action Plan, the aim of which is to ensure that people with a disability can use the expanding array of Telstra products and services.

## CUSTOMER PROFILE

The Australian Bureau of Statistics (ABS) estimated that in 1998, approximately 3.6 million people or nearly 19% of the Australian population had some kind of disability. Approximately 3.2 million of these people with a disability experienced some specific restriction in their core activities, including access to schooling or employment.

A further 3.1 million people have an impairment or long term condition that may, at times, restrict their every day activities.

Communication is identified in the ABS study as one of the fundamentally important activities underlying all aspects of everyday life. Sixteen per cent of the total Australian population experiences profound to mild restrictions in a core activity. The ABS study identifies self-care and mobility as well as communication as core activities.

The largest segment of people with a disability [who experience difficulties with communications] continues to be persons with a hearing impairment, and persons who are severely/profoundly deaf.

Other relevant, though smaller segments include:

- Persons with a mobility impairment
- Persons with a dexterity impairment
- Persons who are blind or vision impaired
- Persons with a speech impairment and communications disability,
- Persons with an intellectual disability.

The Disability Action Plan initiatives recognise the needs of these groups. The ABS survey notes the increasing rate of disability with age. Approximately 84 percent of the population aged 85 years or older experience a disability. This Plan aims to ensure effective communication solutions are available to older Australians.

The information above not only indicates the extent of disability within the community but also highlights the need for telecommunications service providers to effectively cater for this growing segment of the population.

Telstra has provided specialised equipment to people with disabilities since 1981. Currently, through its Disability Equipment Program, Telstra provides a range of rental equipment to enable people with a disability to access the standard telephone service to meet its Universal Service Obligation in the Telecommunications (Consumer Protection and Service Standards) Act 1999 and its obligations under the Disability Discrimination Act 1992. The program is administered through the Disability Enquiry Hotline, a dedicated customer service centre for telephone enquiries, and six Aged and Disability Centres for face-to-face service.

As telecommunications continue to evolve, rapidly creating a greater diversity of solutions, Telstra will continue its commitment to consultation to ensure that it not only understands the diverse telecommunication needs of people with a disability, but that it can provide continually better tailored solutions to them.

## PURPOSE

The Disability Discrimination Act 1992 (DDA) makes it unlawful to discriminate against people on the basis that they have, or may have, a disability. Under Part 3 of the DDA, a service provider, such as Telstra, may prepare and implement an Action Plan, which may also be lodged with the Human Rights and Equal Opportunity Commission. The Action Plan is intended to assist in achieving the principle underlying the DDA that people with a disability have the same fundamental rights as the rest of the

community. The Action Plan is a means for identifying areas of potential discrimination in the delivery of products, services and facilities and for developing an implementation plan to address the issues raised.

## SCOPE

In accordance with section 61 of the DDA, an Action Plan must include provisions relating to:

- (a) *The devising of policies and programs to achieve the objects of this Act;*
- (b) *The communication of these policies and programs to persons within the service provider;*
- (c) *The review of practices within the service provider with a view to the identification of any discriminatory practices;*
- (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 Act may be assessed;*
- (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 the service provider to implement the provisions referred to in paragraphs (a) to (e) (inclusive).*

The Telstra Disability Action Plan 1999-2001 aims to meet these provisions. The Plan adopts the broad definition of disability used in the DDA which includes physical, intellectual, psychiatric, sensory and neurological disability. It also covers physical disfigurement and the presence in the body of an organism capable of causing disease, such as HIV.

The Action Plan aims to address present and planned products and services, policies and facilities. The Plan addresses Telstra's role as the provider of goods and services and that of an employer and recommends strategies which:

- Recognise the provisions of the DDA;
- Build upon the existing programs and services Telstra provides to people with a disability;
- Can be implemented in the timeframe allocated
- Are considered to be realistic and achievable goals
- Are technically feasible in the current environment
- Are financially responsible
- Are consistent with Telstra's existing corporate policies and objectives; and
- Are consistent with improved customer service for all Australians.

## CONSULTATION

Telstra recognises the benefits to be gained from engaging in consultation on both broad disability policy and participation in the product and service development process. Regular contact is maintained between the Telstra's business units, industry and consumer groups. Telstra regularly seeks the advice of service and health professionals. Telstra also relies on research, consumer consultation and advice provided by the Disability Services Unit to ensure that initiatives contained in the Action Plan are relevant and achievable.

Telstra's commitment to formal consultation is evident. In 1989 Telstra formally established the Telstra Consumer Consultative Council which has operated since that time. A Telstra Disability Forum was established in March 1999, replacing an earlier Disability Services Consultative Committee.

The Telstra Disability Forum draws together a wide range of peak disability groups. They include the Australian Association of the Deaf, Communication Aid User Society, National Caucus of Disability Consumer Organisations, Physical Disability Council of Australia, Telephone and Disability Consumer Representation Project, ACROD – National Industry Association for Disability Services, Deafness Forum, National Ethnic Disability Alliance and Women with Disabilities Australia.

Telstra regularly receives or commissions research reports that detail the particular needs of people with a disability in relation to telecommunication services. These reports, and Telstra's customer research which includes discrete disability related complaints analysis, make it clear that customer service for people with a disability is fundamentally improved when customers are able to deal with service staff aware of, and sensitive to their particular needs. The depth of the information available also allows Telstra to build a strong base for understanding the needs of customers with a disability.

Telstra will continue to develop and deliver training programs that promote a better understanding of issues relating to disability and appropriate and effective interaction with our customers with a disability.

## **DISABILITY MISSION STATEMENT**

Telstra's primary disability strategy is to endeavour to make its telecommunications products and services more accessible to all people in Australia with a disability, and to ensure that as products and services are developed or changed, the needs of people with a disability are also taken into account.

Telstra is committed to identifying areas of potential discrimination in the provision of goods, services and facilities through the review of existing practices and the implementation of positive programs.

## **AIMS OF THE PLAN**

Through the Action Plan Telstra aims to:

- Develop policies and procedures to incorporate compliance with DDA into the normal business planning of all Telstra Business Units;
- Identify and where possible eliminate, in an appropriate and reasonable timeframe, any discriminatory practices;
- Ensure all Telstra managers and staff understand the principles of DDA compliance
- Encourage compliance with DDA principles so that services are made accessible for the greatest possible number of people in a practical and cost-effective manner;
- Ensure Telstra treats its customers with disabilities with the same high level of service as other customers
- Ensure ongoing consultation with representatives of the disability community on issues of concern to people with a disability.

## STRATEGIES AND ACTIONS 1999-2001

### Building on past achievements

Telstra's second Disability Action Plan builds on the achievements of the first Action Plan that covered three years, 1996-1998. The first Action Plan contained nine strategies:

1. Develop a Telstra Corporate Disability Policy and DDA Compliance Program
2. Develop a Disability Awareness Program for all staff
3. Ensure ongoing consultation and consideration of developments external to Telstra
4. Improve accessibility to Telstra's buildings and facilities
5. Improve accessibility to information for people with a disability
6. Improve accessibility to Telstra's new products and services
7. Improve access to Telstra's existing products and services
8. Maintain Telstra's commitment to elimination of discrimination in the workplace in accordance with EEO policy
9. Incorporate DDA requirements into existing Telstra policies and programs

The first Action Plan outlined in total 76 action points, 69 (91%) of which were completed or in progress at the end of the first Plan.

An initiative of some importance to improving access to products and services was Telstra's product development process which now provides for disability and usability impact statements to be completed on new products and services. Staff within Telstra's Research Laboratories (Human Factors Group) and the Disability Services Unit are charged with these assessment responsibilities.

The responsibility to ensure adequate staff awareness of Telstra's obligations under the Disability Discrimination Act continues to be recognised, and is reflected in the new Action Plan. Whilst the development of the Corporate Disability Services Policy and its promulgation within the company was one of the key activities in the first Action Plan, awareness-raising and staff training remain as key ongoing commitments. The ability of staff to use Telstra's Disability Services Intranet site can also facilitate awareness training during the term of the new Action Plan.

The new Action Plan also recognises the potential of information and communication technologies to change people's lives. The "online" consumer is recognised both in relation to access to Telstra's website, telstra.com, and also in relation to E-commerce. For people with a disability, the very nature of the electronic media and its use of graphics may limit their use of this new media. A significant research project is being undertaken by Telstra Research Laboratories to build on previous work relating to the development of accessible websites for people with a vision impairment.

Telstra continues to promote and support equal employment opportunities (EEO) within the company and the broader community.

The new Action Plan seeks to build on the initial achievements of the first Plan, as well as recognise the changing telecommunications industry and the growth of online services.

Under the new Action Plan, the strategies and actions for the three-year period to 2001 are:

1. Enhance disability awareness amongst Telstra management and staff
2. Ensure ongoing community consultation
3. Improve accessibility to information for people with a disability
4. Improve accessibility to Telstra's products and services
  - Payphones
  - Directory Assistance
  - Mobile Communication Services including actions addressing
    - ◆ issues relating to hearing-impaired consumers
    - ◆ issues relating to Deaf and speech-impaired consumers
  - Billing
5. Improve accessibility to Telstra's complaint management process for customers with a disability
6. Improve accessibility for the "online" consumer with a disability
7. Improve accessibility of Telstra's facilities
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with EEO policy

**STRATEGIES AND ACTIONS 1999-2001**

**Strategy 1: Enhance disability awareness amongst Telstra management and staff**

Telstra is one of Australia's largest employers, with over 50,000 full-time employees as at June 1999. We are committed to understanding who our customers are and what our customers want. We are developing a well-trained, professional workforce to ensure high standards in all our dealings with customers. We strive to meet or exceed customer requirements.

The following actions commit to improving staff awareness of Telstra's obligations under the Disability Discrimination Act 1992 and the Telecommunications (Consumer Protection and Service Standards) Act 1999 and general disability awareness.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Develop an intranet resource site for Disability Services to <ul style="list-style-type: none"> <li>▪ Assist staff in Telstra in their dealings with people with a disability</li> <li>▪ Provide basic information about disabilities</li> <li>▪ Provide information about Telstra's obligations under the DDA and the Telecommunications (Consumer Protection and Service Standards) Act 1999</li> <li>▪ Provide on-line access to Telstra's Disability Action Plan</li> </ul>	Disability Services Unit	June 2000 with ongoing improvements
Distribute information in a variety of media through staff communications channels	Disability Services Unit Staff Communications	Ongoing
Rotate chairing of Telstra's Disability Forum to enhance disability awareness at a senior management level	Disability Services Unit	Ongoing
Organise information workshops for Telstra management, product managers and developers and/or involve individual managers in consultative forums	Disability Services Unit	Ongoing
Assist training staff to develop training programs or resources, particularly for front-of-house staff	Disability Services Unit	Ongoing

**Strategy 2: Ensure ongoing community consultation**

Telstra established its Consumer Consultative Councils in 1989 operating with national and state/territory Councils. It has continued to operate these and other forums to engage in direct dialogue with consumer organisations, as well as maintaining relationships with individual organisations, service provider and health professional organisations.

The following actions commit Telstra to improving awareness within Telstra of the needs and issues affecting people with a disability.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
In consultation with consumer groups, ensure that the Telstra Disability Forum meets twice annually with peak disability groups	Disability Services Unit	Ongoing
Engage with disability representatives on Telstra's consultative forums and respond to issues raised	Consumer Relations Unit	Ongoing

### Strategy 3: Improve accessibility to information for people with a disability

Telstra utilises a range of channels to promote awareness of its products and services, including its online channel through telstra.com. For people with a disability, the very nature of the electronic media and its use of graphics may limit their use of this new media. Initiatives directed at improving the accessibility of Telstra's website are aimed primarily at improving access for customers with a disability. All customers, however, will benefit from well researched, used-focussed design.

As a result of the commitments made in the first Action Plan, all advertisements that Telstra produces are now captioned.

This Action Plan commits to exploring alternatives for accessing information for people with a print disability, improving access for online consumers and generally improving the accessibility of information about Telstra's products and services for people with a disability.

Action	Responsibility	Timeframe
Explore alternative media for people with a print disability	Disability Services Unit	Pilot program with Radio for the Print Handicapped mid 2000
Develop new promotional material on Telstra's Disability Services, including a comprehensive catalogue of products and services for people with disabilities and the aged	Disability Services Unit	New brochures developed and disseminated 1999 Catalogue production: June 2000
Make available the Customer Service Charter in alternative formats	Consumer Relations Unit	Ongoing
Produce a video for the Deaf community to improve awareness of Telstra's Disability Equipment Program	Disability Services Unit	Launched July 1999 at the World Deaf Congress in Brisbane
Review individual requests for information in alternative formats	Individual business units with the assistance of Disability Services Unit	Ongoing
Review and improve the accessibility of the Telstra website	Online Services	Ongoing
Display disability-related brochures in Telstra Shops	Telstra Retail Services	Ongoing
Establish a programmed "service hotline" from Telstra Shop phones to Disability Enquiry Hotline	Telstra Retail Services	Implemented December 1999

#### Strategy 4 Improve accessibility to Telstra's products and services

Telstra has more than 7 million residential and small business customers. It has more than 3 million mobile customers, and Telstra is the largest Internet service provider in the country. Progressively, Telstra will become a modern communications, entertainment and information enterprise with a deep and enduring base in voice products and services. Most Australians now anticipate a future where they are online all the time, are able to work from many locations, can access information and entertainment instantly, and can exploit the Internet to overcome barriers of distance, time-zones or linkage to vital services.

The following strategies relate to a range of Telstra's products and services, and efforts to improve their accessibility.

#### Strategy 4 Improve accessibility to Telstra's products and services Payphones

As at 30 June 1999, Telstra operated approximately 36,000 public payphones. Other operators had approximately 42,000 coin-only payphones under equipment sale or lease arrangements with Telstra. Telstra's universal service obligation requires it to make payphone services reasonably accessible throughout Australia, including in non-metropolitan and rural areas. Approximately half of Telstra's public payphones are in these areas.

Telstra also operates TTY payphones for deaf and speech-impaired consumers. As at end of 1999, approximately 100 have been installed throughout Australia.

Telstra has upgraded most of its public payphones to accept coins and smartcards. The new payphone has an in-built hearing aid coupling device, volume-control feature and is generally accessible by wheelchair.

The following actions represent an ongoing commitment to improve the accessibility of payphones.

Action	Responsibility	Timeframe
Undertake further research into accessibility of payphones for people with a physical impairment; a reference group, including external consumer representatives and access experts, to be established as a steering group for the duration of the research project.	outn@bout	Completed by end 2000
Undertake a survey of TTY users to better understand usage and siting requirements of TTY payphones and incorporate findings into Telstra siting processes	outn@bout	<ol style="list-style-type: none"> <li>1. Survey completed December 1999</li> <li>2. Present survey results to Disability Forum in March 2000</li> <li>3. Liaison with Australian Association of the Deaf to improve siting guidelines</li> </ol>
Increase the number of TTY payphones installed nationally by responding to consumer requests and implementing findings from siting survey	outn@bout	Ongoing
Progressively remove or replace steps in some payphone installations to improve wheelchair access	outn@bout	Ongoing
Generate awareness of accessibility issues amongst private payphone operators who are Telstra's customers by promoting appropriate siting practices	outn@bout	Ongoing

**Strategy 4    Improve accessibility to Telstra's products and services**  
**Directory Assistance**

Telstra has been providing a world-class directory assistance service free of charge to its customers for many years. Over 440 million calls are made to Directory Assistance every year. In 1988, Telstra established the Directory Assistance Helpline to assist people with a disability to access directory information where they are unable to use the 013/0175 service or they are unable to hold, read or otherwise use the White Pages™ directory. In August 1999 Telstra announced new charging arrangements for mobile and business customers. Charging does not affect residential fixed-line customers. Regardless of new charging arrangements, the Directory Assistance (DA) Helpline will continue to offer free directory assistance to Telstra customers who are registered users of the service.

The following actions commit Telstra to improving access to Directory Assistance information.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Introduce a new five-digit number for the DA Helpline to replace the ten-digit number available to registered users	Telephone Information & Connection Services (TICS)	Completed October 1999
Introduce the option of sending an audiocassette, rather than a letter, to newly registered users of the DA Helpline who are vision impaired	TICS	Introduced October 1999
Distribute a fact sheet on the DA Helpline to community and consumer organisations	TICS in conjunction with Consumer Relations	Ongoing
Improve the registration process to the DA Helpline by establishing an email address	TICS	Mid-2000
Provide appropriate awareness training for DA Helpline staff to ensure a high standard of customer service for Telstra customers who are registered users	TICS	Ongoing

**Strategy 4    Improve accessibility to Telstra’s products and services  
Mobile Telecommunications Services – issues relating to hearing-impaired consumers**

Under its carrier licence conditions, Telstra was required to close all metropolitan and 130 non-metropolitan AMPS base stations by 31 December 1999 and the remaining non-metropolitan base stations by 31 December 2000. As reported in an Australian Hearing study, digital mobile phones can cause an audible buzz in some hearing aids due to the nature of the signal and level of interference immunity of the hearing aid. This is unlike analogue phones which cause no reported audible disturbance.

Telstra’s new CDMA network will replace the analogue network when it is closed down as required by law and is intended to provide reasonably equivalent coverage to Telstra’s AMPS and GSM networks.

People can “connect” to MobileNet at any one of over 80 Telstra Shops nationwide and at other retail stores and independent dealers.

In recognition of the growing usage of mobile phones, including by people with disabilities, the following actions commit to examining issues relating to digital mobile phones and hearing impaired consumers.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Commission Australian Hearing to examine the compatibility of CDMA phones with hearing aids: Phase 1 - laboratory bench testing Phase 2 - objective measurements of hearing aid immunity	Telstra Research Laboratories	Phase 1 completed September 1999 and report published on line * Phase 2 report by August 2000
With the assistance of Cochlear Institute, examine the compatibility of CDMA phones for people with cochlear ear implants	Telstra Research Laboratories	Report by mid 2000
Provide information to staff in Telstra shops and Telstra dealers on the issue of mobiles and hearing aids	OnAir	Ongoing
Provide information to hearing impaired consumers to assist them in the purchase of a mobile phone through <ul style="list-style-type: none"> <li>▪ Brochure “Mobile Phones &amp; Hearing Aids” available in shops and through MobileNet Customer Service 018 018 111</li> <li>▪ Information available on the MobileNet website</li> <li>▪ Information to relevant consumer groups</li> </ul>	OnAir	Revision of brochure completed October 1999 and disseminated; information made available on the Telstra website
Participate in the HREOC inquiry into mobile phones and hearing aid interference and consider the findings in the HREOC report.	OnAir	End 2000

\* <http://www.hearing.com.au/Research/index.html>

**Strategy 4    Improve accessibility to Telstra’s products and services**  
**Mobile Telecommunications Services - issues relating to Deaf and speech-impaired consumers**

Recognising the growing expectation of Deaf and speech-impaired consumers to be able to utilise mobile telecommunications services, the following actions commit to examining ways in which these services can be made more accessible

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Examine overseas developments in mobile textphones which allow connectivity between mobiles and TTYs	OnAir	Ongoing
Work with other carriers to enable the nation’s GSM customers to send SMS (Short Message Service) text messages to users on other networks using their mobile phones	OnAir	April 2000
Promote awareness amongst deaf and speech impaired mobile users about data transmission services	OnAir	Develop targeted information by December 2000

Currently 40% of the population are cellular users. In recognition of the increasing role wireless communications are playing in people’s lives, Telstra will strive to maintain its position as the leading provider of mobile telecommunications services in Australia and recognise the diversity of people’s needs.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Appoint a dedicated Aged and Disability Segment Manager	OnAir	Mid 2000

**Strategy 4    Improve accessibility to Telstra’s products and services**  
**Billing**

Telstra has a long-standing commitment to investigating the accessibility of its bills. In this regard, Telstra investigations revealed that in 1993 an ABS Disability, Ageing and Carers study reported that there were 278,000 people who have a vision impairment - 261,000 of whom have partial loss of sight. In 1998, Telstra launched a Braille bill for its customers with visual impairment. This was an achievement arising from the first Action Plan.

The following action commits to improving accessibility of the Telstra bill for people with vision impairment.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Develop and launch a large print bill for people with vision impairment	Services Marketing	Launched December 1999

**Strategy 5    Improve accessibility to Telstra’s complaint management process for customers with a disability**

Telstra’s aim is to resolve all problems or complaints to a customer’s satisfaction at the local level, quickly and effectively.

If customers are dissatisfied with the management or resolution of their complaint, it may be escalated for an internal review at their request to a supervisor or manager. Telstra has a formal process in place to ensure that complaints are addressed at the highest level necessary. If a complaint is not resolved to a customer’s satisfaction by the above formal process, customers can contact the Customer Referral Centre.

Telstra has appointed complaint management “process owners” in each Business Unit.

Telstra’s complaint registration system allows disability-related data to be sourced and analysed. The following actions commit Telstra to identifying the causes of disability-related complaints and minimising their future occurrence, as well as improving accessibility to Telstra’s complaint handling process.

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Regular analysis of disability-related complaints data; identify causes and develop strategies to address complaint patterns	Disability Services Unit	Ongoing
Targeted briefings of Telstra’s complaint management “process owners” to report on complaint analysis reports and generate increased disability awareness	Disability Services Unit in conjunction with Business Units	Ongoing
Install a dedicated TTY complaints number within the Customer Referral Centre	Customer Relationship Management Unit	Mid 2000
Review information in TTY telephone directory to improve awareness of TTY complaint numbers in Telstra	Customer Relationship Management Unit	Mid 2000
Provide information on Telstra’s complaint handling process in the proposed catalogue of services for people with disabilities	Disability Services Unit	Mid 2000

## Strategy 6 Improve accessibility for the “online” consumer with a disability

Today one in four Australian families are on line. Telstra forecasts that by 2005, 60% of Australians will be active Internet users. And also by 2005, it is projected that virtually all the Australian population will own or have access to (since a large proportion of Internet access comes from workplaces) some form of wireless portable device which will be used sometimes for voice, but mainly for messaging, email, information, downloading, navigation, telemetry, diagnostics and so on.

Telstra recognises the concern with access and equity to online services for the Australian community and the social policy objective of ensuring that all Australians gain benefits from the new communications revolution.

As a provider of Internet services and eCommerce solutions, Telstra seeks to educate and assist businesses to operate successfully on-line.

The following actions seek to improve accessibility for consumers using electronic media for shopping and customer service delivery.

Action	Responsibility	Timeframe
Develop and promote guidelines to assist Telstra eCommerce Business Partners to make websites more accessible	Telstra Retail Services – E-commerce	December 2000
Undertake a project, <i>Building accessible web sites for people with visual impairment</i> , to enable the development of Telstra web-based products and services that are accessible to people with visual impairment. This project will build on the initial study of web accessibility standards for people with visual impairment undertaken in 1997-1998.	Telstra Research Laboratories	Completion by mid 2001

Telstra is the largest Internet service provider in Australia, with many Australians now using our Big Pond® brands.

Telstra aims to improve access for Big Pond® customers with disabilities through the following actions:

Action	Responsibility	Timeframe
Increase general awareness of disability amongst Big Pond technical support staff	Consumer Sales e-magine in conjunction with Disability Services	Briefing material to be prepared by end 2000
Brief Telstra Disability Enquiry Hotline staff on Big Pond® offerings and Telstra <i>easymail</i> ™ to ensure appropriate referrals for customers who wish to get online	DEH Centre Manager	December 2000

## Strategy 7 – Improve accessibility of Telstra’s facilities

Telstra has approximately 1000 commercial sites. An audit of all buildings and facilities was commenced in 1996 with key strategic buildings being targeted for assessment, and works programs have been completed for each State covering those buildings which have a high profile/high public usage within each State. A Telstra Access Advisory Panel has been operating since 1996, acting in an advisory role on matters relating to physical access to, within and from Telstra’s corporate accommodation buildings, as well as a wide range of other disability issues. Telstra’s corporate access policy was formulated in consultation with the Panel. This policy provides Telstra with guidelines on providing an accessible work environment and accessible retail outlets.

To eliminate as far as possible the possibility of leasing buildings with barriers for people with a disability, a pre-leasing assessment form was developed.

The following actions commit Telstra to ongoing access improvements by identifying and addressing access barriers for customers and staff.

Action	Responsibility	Timeframe
Examine leased and owned commercial buildings to assess accessibility and compliance with the DDA	Property Services	Ongoing
When negotiating new leases or existing leases, establish responsibility between the parties for any required rectification works	Property Services	Ongoing
Review building and construction office fitout practices and procedures to ensure all new accommodation works meet access standards	Property Services	Ongoing
Review existing corporate building signage to develop a consistent signage standard which accommodates people with disabilities, particularly vision impairment	Property Services	August 2001
Improve access for people with disabilities to and within Telstra occupied heritage/classified buildings	Property Services	Ongoing
Encourage local councils/shopping centre management to ensure adequate accessible parking spaces are available near Telstra sites, particularly retail outlets	Property Services	Ongoing
Implementation of Works Program to provide ongoing modification of existing buildings to accommodate Telstra employees with a disability	Property Services	Ten-year implementation plan 1996-2006

**Strategy 8 Maintain Telstra’s commitment to the elimination of discrimination in the workplace in accordance with its EEO policy**

Issues of diversity, equity and flexibility are key components for the future of Telstra.

Telstra constantly strives to attract and retain the best employees and to ensure the greatest diversity within its workforce.

EEO goals and objectives are established at the corporate level within Telstra. Business Units develop individual annual EEO Management Plans within the framework of the corporate goals and objectives.

Telstra monitors the representation of specific groups. EEO information is subject to voluntary disclosure in respect of details such as disability and race. Statistical reports are derived from Telstra’s Human Resource Management Information System (HRMIS) which sources information from Telstra’s personnel database (TIPPS).

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Ensure all Telstra employment policies and practices are non-discriminatory. As part of the development process consider impact on staff with a disability and make adjustments where identified as non compliant	Employment GMs ER	Ongoing
Include DDA awareness information in all relevant employment policies and procedures, where not currently addressed.	Employment ER	Ongoing
Maintain, and if required update EEO Disability statement.	Employment	Ongoing
Ensure employment information is provided to employees in a form that is accessible	Employing Business Unit Employment NTG	Ongoing
Facilitate further employment of people with a disability within Telstra. Provide information pertaining to jobs to the ‘one point of contact’ in each state/territory for distribution to disability specific employment agencies including Competitive Employment & Training Services and Commonwealth Rehabilitation Service offices.	Employment Employing Business Unit	Ongoing
Provide opportunities for people with a disability to participate in work training/ work experience and other activities to develop skills and abilities	Employment GM ER all Business Units	Ongoing

## **Section 2 – IMPLEMENTATION AND GOVERNANCE**

### **RESPONSIBILITIES AND RESOURCES**

The Action Plan is a dynamic document and progress against the implementation plan will be monitored on a regular basis for the life of the Plan. As part of the ongoing review of the Plan, a range of information will be collected and analysed to determine progress against targets and goals.

#### **Corporate Responsibility**

Senior managers in Telstra have endorsed the Disability Action Plan.

Telstra's Group Managing Director, Public Affairs and Corporate Marketing, will have corporate responsibility for implementation of the Plan.

#### **Line of Business Responsibility**

Senior Managers from each of the relevant lines of business will oversee the Action Plan compliance process. This senior management governance team oversees the implementation of the Business Unit responsibilities. It will ensure relevant, affordable and achievable initiatives are appropriately funded in annual business plans and budget cycles.

#### **Day to Day Responsibility**

The Disability Services Unit will, in conjunction with an internal working group comprising representatives of various business areas, oversees the day to day implementation of the Disability Action Plan. The Unit will co-ordinate meetings of the working group and prepare regular reports on its Intranet site to report generally within the company on progress and achievements.

Telstra will report annually to the Disability Forum on progress made against the Plan.

Provision has been made for a comprehensive assessment, including external input, to be conducted on conclusion of the Plan. This assessment will review all strategies contained within the Plan and will be used as the starting point for the development of the subsequent Plan. The assessment report will be lodged with the Human Rights and Equal Opportunity Commission.

### **KEY PERFORMANCE INDICATORS**

- Improved customer satisfaction
- Improved customer awareness of Telstra's services for customers with a disability
- Improved feedback from disability stakeholders on Telstra's services for people with a disability

## FUTURE DIRECTIONS

The monitoring and evaluation of the Disability Action Plan will occur on an ongoing basis.

The Action Plan is a dynamic document and it is intended for the Action Plan process to be cyclical, with feedback from previous plans continuing to influence the development of new plans and strategies into the future.

In addition, as part of the ongoing process of consultation with Telstra, consumer and disability representatives will continue to influence the Plan's development.

From time to time amendments may be made to the Action Plan. Amendments may occur in the following circumstances:

- If major changes occur in the legal and regulatory environment in which Telstra operates;
- Following major technological advancements;
- Following changes in community expectations;
- By regular review of operations;
- If disability standards are made and these standards are not already being met or exceeded by the Action Plan; and
- If Telstra wishes to make further provision in the Action Plan, following investigation of a complaint made to either Telstra or the HREOC.

It is expected that the process of review will continue for the life of the Plan and the formal review proposed at the end of 2001 will make further recommendations to integrate the Action Plan initiatives into the regular business planning of the business units.

[Whilst Telstra is committed to the implementation of the documented actions set out in the Action Plan, it will also work towards seeking the support of other carriers and service providers, to ensure that telecommunications services for all people in Australia with a disability are met equitably by the telecommunications industry.]

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