

Telstra's Fourth Disability Action Plan

2007 – 2009



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Table of Contents

BACKGROUND	4
INTRODUCTION	4
OBJECTIVES	5
STRUCTURE	5
1. EMERGING ISSUES	6
2. IMPROVEMENTS TO EXISTING INITIATIVES	7
3. COMPLIANCE AND CONSULTATION PROGRAMS	9
IMPLEMENTATION AND GOVERNANCE	10
MEASURES	10
FEEDBACK	10
CONTACTS	10

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BACKGROUND

The 2003 Australian Bureau of Statistics (ABS) study of Disability and Carers in the Australian Population found that one-in-five Australians reported living with a disability – close to 4 million Australians. Over 6 per cent – 1.2 million Australians – reported a profound or severe level of core activity limitation. The ABS also recognises an increasing rate of disability with age, with up to 45 per cent of people aged 65 to 74 having a disability, and 82 per cent of people aged 85 and over having a disability.

This means that as Telstra customers, Australians living with a disability may have difficulty making or receiving a phone call, using standard voice or text-based phone services or have difficulty reading a standard bill or information about Telstra's products and services.

Telstra has been providing services for Australians with a disability and older Australians for over 25 years. Its commitment has been formalised in three previous Disability Action Plans (1996-1998; 1999-2001 and 2002-2004). All were submitted to the Human Rights and Equal Opportunity Commission (HREOC), as were the respective review reports, which were based on independent assessments of performance against actions undertaken. Telstra's Disability Action Plans and review reports are published online at www.telstra.com.au/disability

INTRODUCTION

The telecommunications industry, both in Australia and globally, has recently experienced extensive and rapid growth, with digital technologies enabling access to a breathtaking new array of products, services and applications. These are now available to 98.8 per cent of Australians via fixed and mobile broadband services.

Telstra remains committed to the basic principle underlying the *Disability Discrimination Act 1992* (DDA), that people with a disability have the same fundamental rights to access existing and new products, services and applications as the rest of the community. Indeed, the rapid growth has provided opportunities that were previously not possible – such as mobile video communication for deaf Australians who prefer to communicate in AUSLAN and access to Third Generation Telstra's Next G™ network) mobile services for Australians with hearing aids and cochlear implants without the concern of interference to their hearing aid.

While Telstra acknowledges its obligation to comply with the DDA, the preparation of our Disability Action Plan is more than just a response to this obligation. There is a strong business imperative supporting the need for the Action Plan, the aim of which is to ensure that Australians with a disability can use the ever-expanding range of Telstra products and services.

The development of a Disability Action Plan is a key element of Telstra's Company Policy on Disability Services, and this Plan is endorsed by Telstra's CEO and senior management team. This Plan demonstrates Telstra's continuing commitment to Australians with disability, which includes many older Australians. It builds on the achievements of the three previous Plans, and sets out Telstra's proposed activities to address any potential discriminatory practices and improve accessibility to Telstra products, services, and information.

This commitment is consistent with the Telstra vision of creating a world of 1 click, 1 touch, 1 button, 1 screen, 1 step real-time solutions that are simple and easy to use, and valued by individuals – including Australians with a disability, businesses, enterprises and government.

Telstra recognises the importance of affordable as well as accessible communication services for customers with a disability. Telstra's **Access for Everyone** program is designed to assist people on low income or facing financial hardship to maintain telecommunications access, including those with a disability. Telstra consults regularly with the Low Income Measures Assessment Committee (LIMAC), which reports annually on the effectiveness of the program. See related link – www.telstra.com.au/accessforeveryone.

OBJECTIVES

The overall objectives of this Disability Action Plan are to facilitate the provision of accessible products, services and information to customers with disability. Telstra will do this in the following ways:

1. Promoting awareness and understanding of accessibility regulatory obligations among management and staff.
2. Encouraging Business Units to embed accessibility compliance requirements into their day-to-day operating processes.
3. Facilitating and checking compliance through a structured self-assessment and reporting framework.

STRUCTURE

This Plan will focus on three specific areas of activity:

1. Emerging Issues

- identified through customer, consumer and other key stakeholder feedback.

2. Improvements to Existing Initiatives

- to ensure that our existing activities related to customers with disability continue and are improved wherever possible.

3. Compliance and Consultation Programs

- to ensure the continuity and ongoing relevance of our internal developmental, operational and compliance processes and our external community, industry and regulatory stakeholder consultation programs.

1. EMERGING ISSUES

A range of new issues have been identified by Telstra's stakeholders, including members of Telstra's Disability Forum and Disability Equipment Program Consumer Advisory Group, consumer and community organisations, service providers to people with a disability, HREOC and customers.

These new issues are identified below. Our actions to improve access to the 'next generation' of telecommunications products and services, including fixed and mobile broadband, at ever increasing speeds, will go a long way towards bridging the 'digital divide' for Australians with disability.

Sector/ Issue	Action	Responsibility	Timeframe
1. Ensure equitable access to text-based services on their mobile phones for customers who are blind	<ul style="list-style-type: none"> ○ Develop appropriate mobile phone options to provide access to text based services for blind customers ○ Work with Industry and other relevant stakeholders to explore economy of scale options for screen reading software 	Telstra Consumer Marketing & Channels (Segments)	<i>Review progress mid-term</i>
2. Ensure equitable access to fixed and mobile video-calling for customers who are Deaf	<ul style="list-style-type: none"> ○ Develop appropriate fixed and mobile video communication options for customers who use AUSLAN 	Consumer Marketing & Channels (Segments)	<i>Review progress mid-term</i>
3. Ensure access to BigPond content services customers who are deaf or have a hearing impairment	<ul style="list-style-type: none"> ○ Continue to explore avenues for the expedient captioning on <ul style="list-style-type: none"> ○ BigPond Movies ○ BigPond TV 	BigPond (Content)	<i>Review progress mid-term</i>
4. Ensure provision of accessible communications products and services on Next Generation Networks for customers who may require disability equipment	<ul style="list-style-type: none"> ○ Manage aspects of Telstra's transformation to ensure customers with a disability and require disability equipment and accessories can successfully migrate to Telstra's Next Generation networks. Eg: <ul style="list-style-type: none"> ○ Ensure interference-free access to our Next G™ network for hearing aids and cochlear implants ○ Continue to explore real-time text communications options for TTY users ○ Explore options to improve video quality on Telstra's Next G™ mobile handsets (e.g. compatibility with H.264 protocol) 	Telstra Operations (Wireless, Product Management, Network and Technology)	<i>Ongoing, Review mid-term</i>

2. IMPROVEMENTS TO EXISTING INITIATIVES

Telstra's previous three Disability Action Plans (1996-2004) focussed on a number of key strategies and actions to identify and address any potential discriminatory practices and to improve the accessibility of our products, services and information.

An independent review of undertakings under our third Plan (2002-2004) found that 92 per cent of actions were *complete*, and the remaining eight percent rated *extensive progress*.

Telstra's previous Plans and review reports are published online at www.telstra.com.au/disability

The following actions build on our previous Plans, ensuring that we continue to monitor our operational processes and practices, and strive towards improvements to the accessibility of our products, services and information.

The following actions are descriptive of Telstra's existing initiatives. As with previous Plans, Telstra will take a flexible approach and review the actions during the life of the Plan. As a result, some actions may evolve with changes in customer needs and advances in technology.

Sector/ Issue	Action	Responsibility	Timeframe
5. Awareness and understanding by Telstra staff of customers with a disability	<ul style="list-style-type: none"> ○ Ensure disability awareness among Telstra staff by way of the on-line Disability Awareness training module, or Business Unit equivalent ○ Regularly review awareness training initiatives to ensure relevance 	Customer facing Business Units Public Policy & Communications Human Resources (Diversity)	<i>Ongoing, review progress mid-term</i>
6. Provision of appropriate equipment for customers with disability to ensure reasonable access to a standard telephone service	<ul style="list-style-type: none"> ○ Maintain a Disability Equipment Program (DEP) and specific associated activities to meet regulatory (USO) obligations, eg: <ul style="list-style-type: none"> ○ Product development, review, maintenance and support ○ A DEP application process ○ Marketing and promotional activities 	Telstra Consumer Marketing & Channels (Customer Sales & Service and Segments) Telstra Operations (Product Management)	<i>Ongoing</i>
7. Provision of public payphones	<ul style="list-style-type: none"> ○ Continue to install TTY payphones based on need/ reasonable customer requests ○ Investigate the possibility of suppressing background noise and improving incoming volume on payphones for customers with hearing impairment ○ Investigate the potential for payphones to send text messages to fixed line phones ○ Investigate the potential for payphones to send emails ○ Continue the program of modifying specified payphones to meet reasonable customer requests (eg payphone height, door width to enable wheelchair access) ○ Continue to investigate and rectify where necessary reported pedestal payphone hazards to people who are blind 	Telstra Consumer Marketing & Channels (Customer Sales & Service/ Payphones)	<i>As required</i> <i>Review progress 0208</i> <i>Review progress 0208</i> <i>Review progress 0208</i> <i>As required</i> <i>As required</i>

Sector/ Issue	Action	Responsibility	Timeframe
8. Provision of directories and directory services	<ul style="list-style-type: none"> ○ Review effectiveness of current format of TTY Directory with stakeholders ○ Maintain a Directory Assistance Helpline ○ Maintain and improve where possible accessible on-line directories ○ Maintain the Call Connect Fee Exemption ○ Maintain an application process to enable eligible customers to access the Directory Assistance Helpline and Call Connect Fee Exemption 	Sensis Telstra Consumer Marketing & Channels (Customer Sales & Service)	3 rd Q 2007 Ongoing Ongoing, Mid term review Ongoing Ongoing
9. Provision of appropriate customer service contact points	<ul style="list-style-type: none"> ○ Maintain a specialist disability centre – Telstra’s Disability Enquiry Hotline – for customer queries ○ Maintain direct TTY/ text access to escalated complaints and faults; explore the potential for expanding text access further (eg for billing inquiries) ○ Ensure callers to Telstra call centres with voice recognition have the ability to readily default to a consultant if required 	Telstra Consumer Marketing & Channels (Customer Sales & Service) Telstra Operations	Ongoing Ongoing Ongoing
10. Access to Telstra information provided via the web	<ul style="list-style-type: none"> ○ Ensure information and content on www.telstra.com conforms with Telstra’s web Accessibility Standard ○ Review Telstra’s web Accessibility Standard to ensure accessibility during Telstra’s business transformation ○ Ensure information and content on bigpond.com is as accessible as possible 	Telstra Operations (telstra.com) BigPond	Ongoing
11. Access to Telstra Shops and properties	<ul style="list-style-type: none"> ○ Ensure Hearing Loops are installed and maintained in all Telstra owned shops and staff instructed on how to use them ○ Ensure ongoing physical access to Telstra shops and premises ○ Explore options to enable video interpreting (AUSLAN) in Telstra Shops 	Telstra Operations (Procurement) Telstra Consumer Marketing & Channels (Customer Sales & Service)	All new + Refits Mid 2008 Audit 2006-07 Refresh 2009-10 Mid term review
12. Access to timely customer information in accessible formats	<ul style="list-style-type: none"> ○ Ensure Telstra bills and bill/ credit management related correspondence, contractual terms, relevant marketing offers are provided to customers in an accessible format where requested ○ Ensure ad-hoc customer requests for information in alternative formats are reasonably met ○ Explore options to promote Telstra’s Disability Equipment Program in community languages 	Telstra Operations (Billing) Telstra Consumer Marketing & Channels (Segments, Channel Development/ Relationship Marketing, Customer Sales & Service)	Ongoing Mid term review
13. Ensuring disability-related complaints are resolved in a timely way, and action taken to address identified root causes	<ul style="list-style-type: none"> ○ Ensure appropriate processes are in place to manage customer complaints relating to disability, including about potential disability discrimination ○ Ensure appropriate processes are in place to analyse disability related complaints and arrange for remedial actions as required 	Telstra Consumer Marketing & Channels (Customer Sales & Service) Public Policy & Communications	Ongoing Analysis Mid 2007 & Mid 2009

3. COMPLIANCE AND CONSULTATION PROGRAMS

Telstra has existing and robust operational processes in place to ensure our products, services and information are generally accessible to customers with disability, and that new products and services in development are assessed to ensure future access to customers with disability. These include our Disability Equipment Program, dedicated staff by way of our Disability Enquiry Hotline, Braille and large-print bills, customer information in alternative formats, and consultation with advocates and representative groups for the disability sector.

Sector/ Issue	Action	Responsibility	Timeframe
14. Ensuring reasonable accessibility of Telstra's products and services	<ul style="list-style-type: none"> ○ Ensure Telstra's business planning and initiative management processes continues to include disability impact assessment, issue identification and appropriate follow-up activities 	Telstra Operations Customer facing Business Units Public Policy & Communications (Regulatory)	<i>Ongoing</i>
15. Ensuring Telstra listens to its customers with disability and their representatives and takes actions to address issues raised	<ul style="list-style-type: none"> ○ Ensure ongoing appropriate external stakeholder consultation, briefings and dialogue eg: <ul style="list-style-type: none"> ○ Telstra's Disability Forum ○ Telstra's Disability Equipment Program Consumer Advisory Group ○ Maintain a regular cross-company disability/ accessibility forum to ensure Business Units are across issues, trends and business opportunities relating to customers with disability 	Public Policy & Communications (Regulatory) All Business Units	<i>Ongoing</i> <i>Ongoing: March & September yearly</i> <i>2nd Q 2007, ongoing</i>
16. Ensuring compliance with Telstra's regulatory obligations for customers with disability	<ul style="list-style-type: none"> ○ Review operational processes and revise where required to ensure Telstra meets disability-related regulations and industry codes and standards, by way of Telstra's Risk Management and Compliance program 	Telstra Consumer Marketing & Channels (Segment) Public Policy & Communications (Regulatory) All Business Units	<i>Ongoing</i>

IMPLEMENTATION AND GOVERNANCE

This Plan is a dynamic document. Progress against implementation will be monitored regularly for the life of the Plan. As part of this ongoing review, a range of information will be collected and analysed to determine progress against actions, targets and goals.

Business Units will have responsibility for implementation and overseeing the progress of their respective actions, ensuring that relevant, affordable and achievable initiatives are appropriately funded in annual business plans and budget cycles.

Telstra Consumer Affairs will, in conjunction with relevant Business Unit representatives, oversee day to day implementation of the Plan. Regular articles will be published in internal employee communication channels and Telstra Intranet site, to report progress and achievements within the company.

Telstra will report mid-term and end-term progress against actions to its Disability Forum.

As with previous plans, 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 HREOC.

MEASURES

- Overall performance – independent review of DAP outcomes
- Complaint management – efficiency and effectiveness of resolving complaints
- Consumer Feedback – from Telstra Disability Forum
- Customer feedback – from DEH Customer Satisfaction survey
- Customer awareness – from Customer surveys.

FEEDBACK

This Plan is published by Telstra Corporation Limited ABN 33 051 777 556. We would welcome any feedback on the Plan, which can be forwarded to the following address:

The Manager, Telstra Disability Action Plan

Freepost: Reply Paid 2474, Locked Bag 4960, Melbourne VIC 3000

Telephone: (03) 9634 5686
Fax: (03) 9663 1218
TTY: 1800 671 880
Email: disability.services@team.telstra.com

A copy of this report is accessible from www.telstra.com.au/disability. Other alternative formats are available on request from the above.

CONTACTS

For general information about Telstra's products and services for people with disability, contact:

Telstra's Disability Enquiry Hotline

Telephone: 1800 068 424
TTY: 1800 808 981
Fax: 1800 814 777
Email: Disability@online.telstra.com.au

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