

Telstra's Third Disability Action Plan 2002 – 2004

Review Report



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1. Introduction

This Report summarises Telstra's progress in meeting the actions contained in the eight strategies detailed in Telstra's third Disability Action Plan (the third Plan) for the three years (2002-2004).

The strategies were:

1. Enhance disability awareness amongst Telstra management and staff
2. Ensure ongoing community consultation
3. Improve access to information for people with a disability
4. Improve access to Telstra's products and services:
 - 4.1 Payphones
 - 4.2 Directory Assistance
 - 4.3 Mobile Services
 - 4.4 Mobile Services – Telstra Shops
 - 4.5 Billing
 - 4.6 Other
5. Improve access to Telstra's complaint management process for customers with a disability
6. Improve access for the 'online' consumer with a disability
7. Improve access to Telstra's facilities
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with its Equal Employment Opportunity (EEO) policy.

This Report has been prepared for the Human Rights and Equal Opportunity Commission (HREOC). Telstra makes this Report publicly available. The Report was prepared by Telstra's Disability Services Unit, and incorporates feedback from members of Telstra's Disability Forum. It also includes the results of an independent quantitative assessment of Telstra's performance in meeting the actions contained in the third Plan.

Telstra's third Plan has been a dynamic document, and progress against the actions contained in the Plan has been regularly reported to consumer representatives at Telstra's Disability Forum.

This Report demonstrates Telstra's continued commitment to people with a disability, both through its internal policies and processes, and in the development of external products and services.

2. Background

Telstra has been providing services for people with a disability for well over 20 years. Its commitment was formalised with the submission of its first Disability Action Plan (1996-1998) to the HREOC in 1996. The Disability Action Plan sets out Telstra's strategies to address any discriminatory practices and improve accessibility to Telstra products, services, and buildings by people with a disability.

In 1999 Telstra submitted a report to HREOC on its achievements in meeting the strategies in its first Disability Action Plan following an independent review. With the submission of this report Telstra also released its second Disability Action Plan (1999-2001). At the completion of the second Plan, an independent review of progress against the Plan found that 100 per cent of actions were either complete or in progress. Telstra again submitted a report to the HREOC outlining how it had met the actions contained in that Plan.

In its third Disability Action Plan (2002-2004) Telstra aimed to build on the achievements of the two previous plans and focus on the key strategies identified in the second Plan. As well as demonstrating Telstra's continuing commitment to people with a disability, the third Plan recognised the increasing ownership of mobile phones and the usage of online services. The third Plan also introduced a range of commitments in relation to customers with intellectual disability. In the third Plan Telstra again indi-

cated that a comprehensive independent assessment would occur at the conclusion of the Plan. That review commenced in February 2005 and forms the basis for this Report.

2.1 Process of Third Review

Telstra has an established internal process to record the progress of all initiatives outlined in its Disability Action Plan. Telstra's Disability Services Unit has maintained a central file for each of the eight strategies outlined in the third Plan. These files contain primary evidence of work undertaken to meet each action in the third Plan. At the completion of the third Plan period an independent consultant was appointed to assess each file and provide a scorecard of Telstra's progress towards implementing actions within the Plan.

In assessing progress against the third Plan, Telstra again appointed Ms Susan Halliday, a consultant with Halliday's Business Insights and former Acting Disability Discrimination Commissioner, to conduct this review (refer Appendix One). This review was conducted in person at Telstra offices (242 Exhibition St, Melbourne) during February and March 2005 and referenced physical and verbal evidence provided by Telstra's Disability Services Unit. Telstra's previous two Plans were also independently reviewed, the second Plan also by Ms Halliday, to provide a quantitative indicator of performance between the Plans.

Telstra's third Plan comprised eight strategies, encompassing 76 specific actions. Each of the 76 actions was rated using one of the following classifications:

- **Complete**
The action was completed during the period 2002-2004, or in the case of on-going actions, the action was sufficiently fulfilled during the 2002-2004 period.
- **Extensive Progress**
Over two-thirds of the work associated with the action in question had been completed.
- **In Progress**
Work associated with the action in question was underway.
- **Not Actioned**
Work associated with the action had not yet commenced.

Halliday's Business Insights provided a summary scorecard of the review results (see 2.2 below), accompanied by an explanatory letter (see Attachment 1). Feedback on Telstra's Disability Action Planning initiatives from the letter was encouraging:

Having reviewed earlier Telstra Disability Action Plans it is clear that the actions of the third Plan built, in a most constructive way, upon earlier work. The actions detailed in the third Plan were realistic, needs focused and plentiful. An exceptional amount of work has been undertaken by the Disability Services Unit, and others in Telstra, to achieve the scorecard ratings recorded.

There is also evidence that as new and unexpected issues and opportunities arose, that they were tackled by the Disability Services Unit, in addition to the 76 actions detailed in the Plan. Further there is evidence of a sophisticated flexible approach to ever evolving circumstance and technology, and at the point in time where an action may have become redundant, or possibly superseded by a better option, the Unit took the initiative to progress an alternative action, or a more contemporary option, rather than simply consider the original action defunct.

2.2 Review results: Independent assessment summary scorecard

| Strategy | Commitments/ Actions | | | | |
|-----------------------------------------------------------------------------------------------------------------------|----------------------|--------------------|-------------|--------------|-------------|
| | Complete | Extensive Progress | In Progress | Not Actioned | TOTAL |
| 1. Enhance disability awareness among Telstra management and staff | 6 | 0 | 0 | 0 | 6 |
| 2. Ensure ongoing community consultation | 11 | 0 | 0 | 0 | 11 |
| 3. Improve access to information for people with a disability | 7 | 0 | 0 | 0 | 7 |
| 4. Improve access to Telstra's products and services: | | | | | |
| • Payphones | 7 | 1 | 0 | 0 | 8 |
| • Directory Assistance | 3 | 0 | 0 | 0 | 3 |
| • Mobiles | 9 | 2 | 0 | 0 | 11 |
| • Telstra Shops | 3 | 1 | 0 | 0 | 4 |
| • Billing | 3 | 0 | 0 | 0 | 3 |
| • Other Products and Services | 5 | 1 | 0 | 0 | 6 |
| 5. Improve access to Telstra's complaint management process for customers with a disability | 3 | 0 | 0 | 0 | 3 |
| 6. Improve access for the 'online' consumer with a disability | 4 | 0 | 0 | 0 | 4 |
| 7. Improve access to Telstra's facilities | 5 | 0 | 0 | 0 | 5 |
| 8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with EEO policy. | 4 | 1 | 0 | 0 | 5 |
| TOTAL | 70 | 6 | 0 | 0 | 76 |
| TOTAL % | 92% | 8% | 0% | 0% | 100% |

The independent review of Telstra's Third Disability Action Plan 2002-2004 found that of the 76 actions detailed in the Plan, 70 fall into the category of COMPLETE (92%) and six evidenced sufficient activity to rate EXTENSIVE PROGRESS (8%).

2.3 Consumer Feedback

Telstra's Disability Forum meets twice each year, usually in March and September. Telstra's Disability Forum includes representatives from a broad cross-section of national peak disability organizations, including:

- Australian Association of the Deaf
- Australian Federation of Disability Organisations
- Better Hearing Australia.
- Blind Citizens Australia
- Communication Aid Users Society (CAUS withdrew from Telstra's Forum in June 2004)
- Deafness Forum
- National Ethnic Disability Alliance
- National Indigenous Disability Network
- Physical Disability Council of Australia
- Telecommunications Disability Project (TEDICORE)
- Women with Disabilities (Aust.).

Telstra has updated its Disability Forum regularly on progress, and sought their feedback on the work being undertaken to meet the actions contained in the third Plan.

3. Strategies and Actions 2002-2004

Strategy 1 – Enhance disability awareness amongst Telstra management and staff

Telstra is one of Australia’s largest employers and this strategy ensures that actions continue to be undertaken to improve 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.

Staff awareness remains an important ongoing activity for Telstra and we are committed to understanding who our customers are and what our customers want.

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| <p>1.1 Progress rollout of <i>Disability Awareness Program</i> to all Telstra staff.</p> <ul style="list-style-type: none"> • Monitor take up of the program and promote in relevant business areas, particularly front-of-house staff • Review the online <i>Disability Awareness Program</i>, as required. Include material to assist staff in their interactions with customers with intellectual disability • Provide tailored awareness information to business partners such as Telstra Licensed Shops | <p>Complete</p> | <p>As at end December 2004 24,175 Telstra staff members had completed Telstra’s online Disability Awareness training program. Priority staff groups for completing the training included :</p> <ul style="list-style-type: none"> • Disability Enquiry Hotline • Directory Assistance Helpline • Telstra Shops • Consumer call centres • Mobile call centres • Customer complaint centres. <p>In September 2004 Telstra reviewed its online training courses and the Disability Awareness Program was confirmed as a ‘mandatory’ course for all staff. Mandatory courses must be repeated by staff every 24 months. Regular reports are provided to senior managers on completion rates of the online course.</p> <p>The Disability Awareness Program was reviewed in both May 2003 and November 2004. As part of these reviews Telstra consulted with the National Council on Intellectual Disability (NCID) to include additional information regarding interacting with customers with intellectual disability or learning difficulties and customers with mental illness or psychiatric disability.</p> <p>All Telstra Shop staff have completed the Disability Awareness Program. Tailored information, based on the Disability Awareness Program, was provided to Telstra Licensed Shop staff in June 2002 as they are not able to access Telstra’s Intranet to complete the course online. Additional awareness information has been added to the Telstra Shops and Telstra Licensed Shops databases.</p> |

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| <p>1.2 Review and improve the Disability Services Intranet resource site to include:</p> <ul style="list-style-type: none"> • More statistical and empirical information on disability trends • Guidelines to assist staff develop appropriate 'plain English' material | Complete | <p>A major redevelopment of the Disability Services Intranet site was undertaken in January 2003 to improve information on, and the design of, the site. Additional information was added in sections including 'Newsflash', 'Research and Trends in Disability', 'Disability Resources' and additional links were included in the 'Useful Links' section. The statistical information was updated in November 2004 using information from the Australian Bureau of Statistics (ABS) <i>Ageing and Carers Survey 2003</i>. The site is reviewed regularly, and updates occur as necessary.</p> <p>Disability information is also included on the Disability Enquiry Hotline (DEH); Telstra Country Wide® and Diversity Intranet sites. Telstra Fast Facts Intranet site was updated with disability information in June 2004.</p> <p>Telstra's Customer Service Charter contains a commitment to providing information about products and services in plain language.</p> <p>Telstra has developed Written Communication Guidelines for both letter and email writing. These Guidelines include information on how to prepare information in plain language and are available to staff through Telstra's Intranet.</p> |
| <p>1.3 Regularly include articles in staff communications media</p> | Complete | <p>Regular articles have been placed in staff communications. Topics have included:</p> <ul style="list-style-type: none"> • International Day of People with a Disability • Disability Action Plan achievements • hints for interacting with customers with disability • Telstra sponsorship activities within the disability community • profiles of staff members with a disability including Paralympians • location of TTY Payphones • Telstra's Disability Forum • corporate and staff achievement awards in the area of disability. |

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| <p>1.4 Recognise achievements in disability activities eg. internal achievement awards, articles in staff communications news bulletins</p> | <p>Complete</p> | <p>A major internal event for staff, usually involving an external sponsorship, is held each year on International Day of People with a Disability on 3rd December.</p> <p>In 2002 Telstra launched its third Disability Action Plan at a staff event.</p> <p>In 2003 Telstra sponsored an event staged by <i>Club Wild</i>, one of Australia's leading disability arts organisations. Over 700 people attended the event including many Melbourne-based Telstra staff.</p> <p>In 2004 Telstra was the major sponsor of a public awareness campaign run by the NSW Department of Ageing, Disability and Home Care 'Don't DIS My ABILITY'. Telstra staff and external stakeholders were invited to a Sydney event to celebrate the launch of this campaign. In Melbourne a Telstra staff event was held with competitors from the Deaflympics attending.</p> <p>Articles regarding the above activities were placed in Telstra internal communications.</p> <p>Regular events have also taken place, and articles included in internal publications, to recognise achievements by Telstra staff with a disability.</p> |
| <p>1.5 Obtain staff involvement in disability activities eg. sponsorship events through 'Telstra Friends'</p> | <p>Complete</p> | <p>Telstra Friends, Telstra's employee volunteer program, are actively involved in many disability-related events. In particular staff were involved in International Day of People with a Disability 2004, disability sponsorship events including Inclusion International, Paralympic events and the Deaflympics.</p> <p>Senior managers are regularly involved in Telstra's disability sponsorships including performing in key roles as spokesperson or chairperson. Telstra staff with a disability are included in disability activities eg. Telstra appointed a staff member who is Deaf as Telstra's Deaflympic Games Ambassador. All Telstra staff are encouraged to participate in events such as Telstra's annual event on International Day of People with a Disability.</p> <p>Staff information sessions are held to raise awareness of disability. Topics have included the Paralympics, mental illness and recovery, Deaf culture, AUSLAN classes, deafblind and vision impairment awareness.</p> |

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| <p>1.6 Continue to provide information to Telstra line and product managers and developers and involve individual managers in consultative forums</p> | <p>Complete</p> | <p>A regular meeting is held with representatives from a wide range of Telstra's Business Unit to discuss disability issues.</p> <p>Telstra senior managers and relevant product managers are invited to attend Telstra's Disability Forum. The Forum is co-chaired by a senior Telstra manager on a rotational basis.</p> <p>Information is provided to product/project managers via the Business Initiative Management System (BIMS) to improve awareness about the accessibility of products and services for people with a disability.</p> <p>Information is available to Telstra staff and managers via Telstra's Disability Services Intranet site.</p> |

Strategy 2 – Ensure ongoing community consultation

Telstra has conducted formal Consumer Consultation since 1989 through the Telstra Consumer Consultative Council and its working groups. In 1999 Telstra's Disability Forum was established replacing the earlier Disability Consultative Council. Telstra's Disability Forum meets twice per year with senior Telstra managers. Organisations represented include: Australian Association of the Deaf, Blind Citizens Australia, Australian Federation of Disability Organisations, Physical Disability Council of Australia, Telecommunications Disability Project (TEDICORE), Women with Disabilities (Aust.), National Ethnic Disability Alliance, Deafness Forum, National Indigenous Disability Network, Better Hearing Australia and National Council on Intellectual Disability.

Telstra's Disability Equipment Program Consumer Advisory Group (DEP CAG), established in 2000, includes four representatives of Telstra's Disability Forum. The DEP CAG provides feedback to Telstra on the operation of Telstra's DEP and in the development of products and services offered through the program.

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| 2.1 In consultation with consumer groups, ensure that Telstra's Disability Forum continues to meet twice annually with peak disability groups | Complete | Telstra's Disability Forum met bi-annually in March and September/October in 2002-2004. |
| 2.2 In consultation with consumer groups, ensure the DEP CAG continues to meet twice annually to provide input to Telstra's DEP including expansion of the program to include a Braille TTY, large visual display TTY, single-switch access function for the standard telephone and a Big Button phone | Complete | <p>Telstra's DEP CAG met bi-annually usually in March and September/October in 2002-2004.</p> <p>A new standard telephone, which incorporates volume control and a number of other improved features useful for people with a disability, was introduced in 2003.</p> <p>In early 2003 Telstra added a Braille TTY and a Large Visual Display (LVD) TTY to the products available through Telstra's DEP.</p> <p>In December 2004 a cordless telephone was also added to the DEP.</p> <p>DEP CAG members have been involved in the development of a Big Button multi-feature phone, which was released mid-2005. An additional DEP CAG meeting was held in 2004 to discuss the development of this phone. DEP CAG members trialled this phone in 2005 and their feedback was used to further improve the features of this phone.</p> |
| 2.3 In consultation with the DEP CAG investigate issues for TTY users reporting faults to Telstra | Complete | In August 2003 a new TTY Fault reporting line was established. Telstra customers who use TTYs can now report faults directly to Telstra via the TTY Fault Centre on 1300 139 404 on their TTY. The TTY fault centre operators can also be contacted by telephone. The centre is staffed for direct TTY/voice calls between 7am-7pm Monday to Saturday and 9am-5pm Sunday. At other times, TTY users can contact Telstra faults via the National Relay Service. |

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| 2.4 Consult with members of Telstra's DEP CAG to ensure that the annual Customer Satisfaction Survey undertaken with customers of Telstra's Disability Enquiry Hotline is thorough and comprehensive | Complete | DEP CAG members were involved in the design of the Customer Satisfaction Survey in both 2003 and 2004. |
| 2.5 Continue engagement with disability representatives on Telstra's consultative forums and respond to issues raised | Complete | The Telstra Consumer Consultative Council (TCCC) Consumer e-News and Disability Alerts are regularly distributed to Disability Forum members. Briefings and consultation, including by audio-conference, has occurred between forum meetings on a range of initiatives and events including: the Wholesale DEP, closure of the Aged and Disability Centres, major pricing changes, Telstra's Customer Service Charter and credit management initiatives. |
| 2.6 Broaden representation on Telstra's Disability Forum, including representation by Service Provider organisations | Complete | A representative from the National Council on Intellectual Disability (NCID) joined Telstra's Disability Forum in October 2002. A representative from Carers Australia was invited to join Telstra's Disability Forum in March 2003 however it was later agreed with this organisation that they would not continue representation on this Forum. In September 2004 a long time member organisation of Telstra's Disability Forum, the Communication Aid Users Society (CAUS), withdrew its representation on a number of Government and Regulatory forums and Telstra's Disability Forum. Telstra discussed this with CAUS management, who have an open invitation to re-join the Forum at any time. |
| 2.7 Provide targeted support to organisations eg. technological advice | Complete | Telecommunications advice was provided to NCID as part of Telstra sponsorship of Inclusion International in September 2002. Assistance (audio-conference facilities) was provided to National Indigenous Disability Network (NIDN). Telstra has regularly provided technological advice including updates on new developments to a range of consumer organisations. |
| 2.8 Strengthen the relationship with the Independent Living Centres to promote awareness of Telstra's Disability Services | Complete | Discussions commenced with the Independent Living Centres (ILC) in late 2002. Manager, Disability Services attended the National Conference of the ILC Directors in May 2003. ILCs in each state now provide viewing facilities for Telstra's range of DEP products, specifically for people with functional communication difficulties. |

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| <p>2.9 Explore opportunities to consult with the newer members of Telstra's Disability Forum including National Indigenous Disability Network (NIDN), National Ethnic Disability Alliance (NEDA) and the National Council on Intellectual Disability (NCID)</p> | <p>Complete</p> | <p>A meeting was held with NCID in November 2002 and January 2003 to discuss strategies for improving Telstra's information, including plain-English material. Subsequent meetings were held in 2003 and 2004 to discuss the incorporation of information regarding intellectual disability in Telstra's Disability Awareness Program and also Telstra's development of plain-English contracts.</p> <p>A meeting was held with Telstra's Disability Forum National Ethnic Disability Alliance (NEDA) representative in May 2003 to discuss joint project opportunities for the sector. Information about Telstra's <i>Access for Everyone</i> program, which includes disability information, has been sent to a range of stakeholder groups from Non-English Speaking Backgrounds.</p> <p>Consultation has occurred with consumer organisations on the many initiatives Telstra has developed to support the Indigenous sector particularly through the development of the <i>Access for Everyone</i> package.</p> |
| <p>2.10 Invite the National Council on Intellectual Disability to participate in Telstra's Consumer Consultative Council's Credit Management Working Group to discuss identified issues related to people with intellectual disability</p> | <p>Complete</p> | <p>A representative from NCID attended the TCCC Credit Management Working Group in November 2002.</p> |
| <p>2.11 Ensure early consultation occurs when considering new initiatives, particularly for new technology and include universal design principles wherever possible</p> | <p>Complete</p> | <p>Telstra included representatives from the DEP CAG in discussion groups regarding the development of Telstra's new standard rental telephone. This new standard rental telephone incorporates universal design principles, and is Telstra's first standard rental telephone to have volume control functionality.</p> <p>The DEP CAG was also consulted in the development of the Braille and LVD TTYs, cordless phone and the Big Button multi-feature telephone. DEP CAG members trialled these phones and their feedback was incorporated.</p> <p>Telstra's Disability Forum regularly included discussions and briefings on new and emerging technologies. Telstra's regular TCCC Consumer e-News and Disability Alerts sent to stakeholders include information about new initiatives.</p> |

Strategy 3 – Improve access to information for people with a disability

Telstra utilises a range of channels to promote awareness of its products and services, including its products and services for people with a disability. Telstra's DEP catalogue is accessible online at www.telstra.com.au/disability. Telstra's Disability Enquiry Hotline provides advice about the Telstra DEP and other Telstra equipment that may provide solutions for customers' telecommunications needs. As a result of commitments made in earlier Plans, large print, audiotapes, computer disks (floppy and CD) and videotapes are some of the communications tools now used to communicate with customers.

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| <p>3.1 Promote awareness of Telstra's products and services for older people and people with a disability through mass market and targeted media including Radio for the Print Handicapped, community and municipal associations</p> | <p>Complete</p> | <p>Advertisements</p> <ul style="list-style-type: none"> • Age Pension News for Seniors (2003) • Australian Retirement Press (2003) • Australian Seniors Newspaper (2003-2004) • Centrelink News for Seniors (2004) • DPS: Guide to Aged Care (2002-2004) • Disabled Workers Union (2002) • Have a Go News (2002) • House and Garden (2002) • Impact Magazine (2003-2004) • Insite – The Aged Care Industry Newspaper (2003) • Jewish News (2002) • Link magazine – 5 issues per year (2002-2004) • Radio for the Print Handicapped (2003) • TAD Journal (2002) • Teletypewriter Directory (2002-2004). <p>Advertorials</p> <ul style="list-style-type: none"> • Link magazine – each edition featured an article about a new Telstra initiative (2002-2004) • Deafness Forum newsletter (2003) • Radio for the Print Handicapped (2003-2004) • Accessibility.com (2003) • Royal Blind Society Donor newsletter (2003) • Better Hearing Australia (2003) • Printacall (2004) • Carers' National News (2004) • Deaflympics e-newsletter (2004) • Employers Making a Difference (2004) • Independent Living Journal (2004). <p>Media Releases</p> <ul style="list-style-type: none"> • Telstra sponsor of Inclusion International Congress • Release of Telstra's Disability Action Plan • Telstra Country Wide supports Hearing Awareness Week • Telstra wins Prime Minister's Employer of the Year Awards |

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| | | <ul style="list-style-type: none"> • Students win national Deafness Forum Telstra scholarships • Telstra leads community support for the 2005 Deaflympic Games. <p>Sponsorships Organisations and projects Telstra sponsored include:</p> <ul style="list-style-type: none"> • Australian Rehabilitation Lifestyle and Equipment Exhibition (2002) • Victorian State Deafness Conference (2002) • Deafblind Association wine auction Vic (2002-2003) • Albury Ideas Expo (2002) • Deafblind Council Conference (2002) • Supertext Captioning Awards (2002) • People with Disabilities (WA) Multi-media award (2002-2003) • Inclusion International Congress (2002) • Deafness Forum Educational Scholarships (2003-2004) • Better Hearing Australia Annual National Conference (2003-2004) • Royal Blind Society Internet Training Program (2003-2004) • Carers Australia National Conference (2003) • Royal Victorian Institute for the Blind (2003) • Blind Citizens Australia National Conference (2003) • International Day of People with a Disability (<i>Club Wild</i> Celebration of Ability, 2003 and Don't DIS My ABILITY Campaign (NSW) 2004) • Melbourne 2005 20th Deaflympic Games (2004) • Blind Citizens Australia State Conventions (2004) • Carers Australia National Website (2004) • Deafness Forum Captioning Awards (2004) • Blind Golf Australia (2004) • Technical Aid to the Disabled (2004) |
| 3.2 Review and expand the range of disability support material including information published online. | Complete | <p>Internet</p> <p>2002</p> <ul style="list-style-type: none"> • DEP information provided online • All Disability Action Plans and Review reports published online. <p>2003</p> <ul style="list-style-type: none"> • TTY Payphones location published online, accessible at www.telstra.com.au/payphoneservices |

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| | | <ul style="list-style-type: none"> • Telstra's Catalogue of <i>Products and Services for Older People and People with a Disability</i> published online • Telstra Disability Services Internet site was redesigned in 2003 www.telstra.com.au/disability. <p>2004</p> <ul style="list-style-type: none"> • The Telstra Disability Services Internet site is regularly reviewed and updated. The site has a range of features, including the ability to alter the text size and print copies of each page separately. <p>New brochures/applications/promotional material introduced or revised in 2002-04</p> <ul style="list-style-type: none"> • DEP – TTY brochure • Disability Action Plan A4 leaflet • Telstra's commitment to customers with intellectual disability leaflet • Braille and LVD TTY information and application form • Telstra DEP Brochure and Application form (revised twice in this period) • Telstra Call Connect fee exemption application form (revised) • Telstra Directory Assistance Helpline application form • Telstra Wholesale DEP Application form • Cochlear implant telephone adaptor information (revised) • Accessible communications in Melbourne (Deaflympic specific) • DEP posters for external agencies/Telstra Country Wide® offices • <i>Telstra's Products and Services, A catalogue for older people and people with a disability</i> (extensively revised and the new version sent to over 120 community and disability organisations once printed in June 2003). |
| 3.3 Publish selected customer information in alternative format | Complete | <p>Telstra publishes selected material in alternative formats including the:</p> <ul style="list-style-type: none"> • Customer Service Charter • Disability Action Plan reports • Priority Assistance® brochure/application form • Message Bank user guide • HomeLine™ Plus services brochure • Home Messages 101® information • Telstra Feature Assistant 1#® Call Forward |

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| | | <p>user guide.</p> <p>Customer information, including the DEP application form and Braille and LVD TTY applications forms, are available in alternative formats through the Disability Enquiry Hotline.</p> |
| 3.4 Continue to provide captioning on all Telstra television advertisements | Complete | Now a standard requirement for all Telstra advertisements. |
| 3.5 Continue to produce specific information in alternative format on request | Complete | Information is available to staff through Telstra's Intranet about how to provide information in alternative formats to customers on request. |
| 3.6 Improve appropriate material to demonstrate a 'plain English' style in customer information in consultation with relevant disability consumer groups | Complete | <p>A meeting was held with NCID in November 2002 and January 2003 to discuss strategies for improving Telstra's information, including plain-English material.</p> <p>Telstra consulted a plain-English specialist on a range of publications including 'Mobile Services: What you need to know before you sign up' and information currently being developed about Telstra's mobile services for people who are deaf or have hearing impairment.</p> |
| 3.7 Promote 'inclusiveness' theme in Telstra advertising including use of images of people with a disability | Complete | Some of Telstra's television advertisements have included people with a disability. Telstra's marketing and advertising group has been provided with a number of case studies of people with a disability. |

Strategy 4 – Improve access to Telstra’s products and services

New technologies are continually being introduced. Telstra is committed to ensuring that its products and services are accessible for all its customers, including customers with a disability.

The following strategies relate to a range of Telstra’s products and services and initiatives to improve their accessibility.

Strategy 4.1 – Improve access to Telstra’s products and services: Payphones

Telstra’s Universal Service Obligation (USO) requires it to make payphone services reasonably accessible throughout Australia. This includes non-metropolitan and rural areas and approximately half of Telstra’s public payphones are in these areas. Telstra also operates TTY payphones for consumers who are deaf or have speech impairment. During 2002-2004, Telstra continued to roll-out TTY payphones and began to include SMS functionality on payphones. As at December 2004, there were 230 TTY payphones. In addition, 48 per cent of Telstra’s 34,000 payphones, – around 16,000 were SMS enabled.

Telstra has upgraded most of its public payphones to accept Telstra Smart Phonecards in addition to coins. Payphones are also being upgraded with an in-built hearing aid coupling device, volume control feature, language selection, large visual displays and improved wheelchair accessibility.

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| <p>4.1.1 Continue to review the outcomes of the Payphone Physical Access Research Study (completed during the second Disability Action Plan) including:</p> <ul style="list-style-type: none"> • submit outcomes to Standards Australia to develop a new Australian Standard for the mounting height of public payphones • investigate ways of assisting people in wheelchairs with limited upper limb mobility to have access to communications when out and about | <p>Extensive progress</p> | <p>Telstra has reviewed the outcomes of the Payphone Physical Access Research Study and is developing its submission for Standards Australia.</p> <p>Telstra Payphones Group has been developing a preliminary draft Industry Code for Payphones in consultation with Telstra’s Disability Forum Payphones Working Group (first meeting held in February 2004). Regular meetings have been held with opportunities for consumers to comment on the draft code between meetings. At end December 2004, this draft code was in the final stages of development. The Draft will be submitted to the Australian Communications Industry Forum (ACIF) for consideration, as the basis of an ACIF Payphones Code.</p> <p>Telstra has developed a modified Bluephone payphone with headset compatibility for use by people with limited upper limb mobility at selected sites in WA to replace modified Redphones.</p> |

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| 4.1.2 Through targeted communications, improve the awareness of the latest payphone features designed to assist people with a disability eg. volume control feature | Complete | <p>Telstra has developed a 'How to use a Payphone' leaflet. Brochures on Payphone booth products, Telstra Payphone TTY and Telstra Payphones are now available for site owners, local government and the public. Information is also available on the Telstra Payphone website.</p> <p>Payphones information is included in Telstra's <i>Catalogue of Products and Services for older people and people with a disability</i> and in Telstra Disability Services presentation packs for use with community and other stakeholder groups.</p> |
| 4.1.3 Review the location of TTY payphones to ensure siting best meets the needs of TTY users: <ul style="list-style-type: none"> • research available data and statistics to map and match potential TTY users to the location of terminals by Post Code or local government area, in consultation with relevant stakeholders • determine an appropriate standard location for TTY payphones in major centres | Complete | <p>Telstra Payphone Services and Telstra Disability Services have met with Australian Association of the Deaf (AAD) to discuss siting of TTY payphones.</p> <p>TTY locations are now published online at www.telstra.com.au/payphoneservices Through this site, consumers can email Telstra with any siting suggestions. There were 230 Telstra TTY payphones in operation nationally as at December 2004, which represents a 35 per cent increase from June 2002. Additional payphone TTYs were installed for the 2005 Deaflympics in Melbourne and Ballarat.</p> <p>Any suggestions from consumers about siting locations for TTY payphones are investigated.</p> |
| 4.1.4 Investigate the feasibility of a robust TTY payphone attachment for outdoor locations | Complete | <p>Telstra held extensive discussions with a manufacturer regarding the development of an attachment that would meet Australian compliance standards. It was determined this was not feasible due to the cost and the length of time it would take to develop. Telstra will instead deliver the existing TTY payphone with waterproof keyboards in suitable booths in supervised external areas.</p> |
| 4.1.5 Continue the project to investigate the feasibility of sending SMS from payphone to mobile | Complete | <p>At December 2004, almost 48 per cent of Telstra's 34,000 payphones were enabled to send an SMS. All Telstra TTY payphones and standard payphones in remote localities have SMS capability. Telstra will continue enabling payphones in rural and urban areas to send an SMS.</p> |
| 4.1.6 As part of an ongoing upgrade program to older installations – progressively remove steps or lower slab heights, widen doorways and place payphone at recommended mounting heights | Complete | <p>Ongoing activity within Telstra Payphone Services continues to identify and upgrade sites on a priority basis. Over 100 sites are being upgraded ranging from booth widening to complete re-installation of the facility to pavement level. Funds have been allocated in 2004-05 to continue upgrading existing sites.</p> |

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| <p>4.1.7 Examine the issues for people who are visually impaired, particularly those using mobility canes, in relation to pedestal style booth siting and promote awareness of these street furniture issues with site owners such as local municipalities</p> | <p>Complete</p> | <p>Development work was undertaken with Telstra's booth manufacturer to conceptualise and design a bollard, or changes to the booth side, to enhance the ability to detect the booth using mobility canes. Board members of Blind Citizens Australia provided feedback and information on the bollard concept at a product trial at the manufacturer's premises in 2004.</p> <p>Telstra Payphone Services Account Executives regularly provide advice to site owners regarding siting of pedestal style booths.</p> |
| <p>4.1.8 Review Telstra's siting guidelines as appropriate and continue to:</p> <ul style="list-style-type: none"> • promote awareness of access issues with payphone suppliers and • promote awareness of appropriate siting practices with site owners | <p>Complete</p> | <p>Telstra Payphone Services Account Executives routinely provide information and information packs to payphone suppliers and site owners regarding accessibility issues.</p> <p>All new payphones comply with the Australian Standard <i>Requirements for Customer Equipment for use with the Standard Telephone Service – Features for special needs (AS/ACIF S040)</i> and are installed in accordance with Telstra guidelines.</p> |

Strategy 4.2 – Improve access to Telstra’s products and services: Directory Assistance

Telstra’s Directory Assistance Helpline (DAH) has been operating since 1988. The DAH was established to assist Telstra customers who are unable to use the standard Directory Assistance service, and unable to hold, read or use Telstra’s printed telephone directories, to access directory information. As at end December 2004, 7,322 people were registered DAH users. The service receives approximately 325,000 calls per year.

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| 4.2.1 Continue to support Telstra’s DAH, including: <ul style="list-style-type: none"> • reviewing the application process • regularly reviewing service levels and suggesting improvements as required | Complete | <p>A new DAH application form was developed in 2003. Information about the service and an application form have been produced in audiocassette.</p> <p>Service levels at the DAH are regularly reviewed; and are at a consistently higher level than other Telstra call centres. Additionally a Customer Satisfaction Survey was undertaken in September 2003. Results of the research were discussed with management of the DAH and suggested strategies to improve customer service were considered.</p> |
| 4.2.2 Provide appropriate awareness training to DAH staff as required | Complete | All staff at the DAH have completed Telstra’s Disability Awareness Program online training course. New staff are required to undertake the program. |
| 4.2.3 Improve awareness within the community of Telstra’s DAH including: <ul style="list-style-type: none"> • promote DAH information in key Telstra publications • include DAH information in Telstra’s online disability catalogue | Complete | <p>Information about the DAH was included in both the online and printed versions of the revised disability catalogue, released in July 2003. An information sheet was developed on the DAH. Information has also been included in other key publications, including relevant media releases and Telstra Disability publications. Information support systems for Telstra customer service consultants have been updated to include information about the DAH.</p> <p>Telstra promotes the Directory Assistance Helpline by way of radio advertisements on Radio For the Print Handicapped (RPH) nationally on a regular basis.</p> |

Strategy 4.3 – Improve access to Telstra’s products and services: Mobile Services

Telstra operates Australia’s two largest digital cellular networks the CDMA and the GSM networks. Telstra is committed to ensuring all its customers can utilise its products and services. The rapid growth in text messaging (SMS) and WAP (Wireless Application Protocol) services, including e-mail, chat, games, sport and travel information provides new opportunities for meeting the needs of people with a disability. In 2003, Telstra Disability Services supported a research study by Regency Park Engineering (SA) [now known as Novitatech] to enable people with an upper limb mobility impairment to access mobile phones. Findings from this study indicated that in many cases it is possible for people with severe physical limitations to use a mobile phone with careful matching of currently available products and services. In 2005, Telstra continued to support Novitatech’s further work in this area

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| <p>4.3.1 Take a leadership role in the field of disability services:</p> <ul style="list-style-type: none"> • Represent Telstra Mobile on at least one major public forum each quarter relating to disability services • Establish an active program of consultation with external organisations to better understand the needs of Telstra Mobile users and potential users with a disability | <p>Complete</p> | <p>In 2002-2004 the Telstra Mobile Segment Manager:</p> <ul style="list-style-type: none"> • Regularly attended the twice-yearly Telstra Disability Forums • Attended various public forums relating to disability services including Christopher Reeves ‘Making Connections Forum’ in Sydney (Jan 2003) <i>Disabled People International World Summit 2004</i>’ in Canada • Consulted with Victorian Council of Deaf People, AAD and Vision Australia. <p>Telstra has taken a leadership role in a number of mobile industry wide forums including a disability committee established by the Australian Mobiles Telecommunication’s Association (AMTA) to consider disability-related issues and to ensure that other AMTA internal working groups and members are aware of these issues. Telstra has also been actively involved in the Australian Communications Industry Forum (ACIF) working group CECRP WC 19 ‘Information on the Accessibility of Telecommunications Equipment’. This group aims to develop an Industry Code to specify obligations on equipment manufacturers, importers and suppliers of fixed and mobile phone equipment to provide information to retailers/CSPs about functional characteristics of this equipment that would benefit people with a disability. Retailers/CSPs would then make the information available to consumers to assist them to make an informed choice when choosing telephone equipment.</p> <p>The TCCC hosted a consumer-led ‘Mobiles and Wireless Cultures’ Forum in July 2004. Members of Telstra’s Disability Forum were encouraged to attend.</p> |

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| <p>4.3.2 Explore ways to improve access to mobile services for customers with intellectual disability by utilising Telstra's prepaid mobile products:</p> <ul style="list-style-type: none"> • Liaise with the Telstra Consumer Consultative Council's Credit Management Working Group to discuss identified issues related to contracts and people with intellectual disability • Develop appropriate customer information and distribute through appropriate channels such as Telstra's Disability Enquiry Hotline and Telstra website | Complete | <p>A representative from NCID attended Telstra's TCCC Credit Management Working Group's meeting in November 2002 to discuss issues identified. Telstra has developed a fact sheet for customers 'Stay connected: mobile phone services' designed to simplify mobile phone decisions for customers. Telstra consulted a 'plain-English' specialist during the development of this guide.</p> <p>Telstra Mobile's Internet site has been updated with information about mobile phones suitable for people with a disability. Comprehensive information about Telstra's mobile products was included in <i>Telstra's Products and Services, A catalogue for older people and people with a disability</i>, which was published in hard copy and online during the life of this Plan.</p> |
| <p>4.3.3 Promote the availability of alternative formats for Telstra Mobile bills including Braille, large print and online options</p> | Complete | <p>Mobile phone bills can be provided in a variety of formats including online, large print and Braille. Information on how to provide customer information in alternative formats, including mobile phone bills is available to Telstra Mobile customer service consultants through Telstra's Intranet.</p> <p>Telstra Disability Services created a presentation pack, available on Telstra's Intranet, which includes information about alternative formats for mobile phone bills. With the introduction of Telstra Single Bill most advertising has concentrated on promotion of 'bills in alternative format' generally rather than specific mobile phone bills.</p> |
| <p>4.3.4 Update existing information (brochure, website) on mobile products and services for customers with a disability (eg. mobile phones and hearing aids/cochlear implants brochure) and develop new targeted material</p> | Complete | <p>Information has been included on Telstra Mobile's website about mobile phones and hearing aids. Additional targeted information will not be developed relating to hearing aids.</p> <p>Targeted material relating to Telstra's SMS plans was developed for customers who are deaf eg. an advertisement in Supertext News (quarterly publication for Australian Caption Centre) in December 2002 and for the Deaflympics in December 2004/January 2005.</p> |

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| 4.3.5 Conduct information program and training to improve awareness amongst Telstra Mobile Shop staff about appropriate mobile products for people with a disability | Complete | <p>Telstra's Intranet, updated in September 2003, includes comprehensive information about Telstra mobile products and services. It also includes information about the selection of mobile devices for people with a disability. The Intranet is accessible to Telstra Mobile customer service consultants.</p> <p>All Telstra Shop staff are required to complete the online <i>Disability Awareness Program</i> training course.</p> |
| 4.3.6 Develop targeted mobile product - pricing packages to suit specific disability sectors: customers with hearing, speech or vision impairment and intellectual disability | Complete | Telstra has reviewed mobile pricing plans to ensure customers who are deaf have access to a suitable SMS/text pricing plan. Telstra has developed targeted material around suitable text pricing plans for these customers. |
| 4.3.7 Monitor the development of mobile product technologies - for people who are deaf, have hearing impairment or have a cochlear implant. This includes participation in the industry study to be conducted with Australian Hearing and other carriers and manufacturers | Complete | <p>Telstra has taken an active role in industry discussions through involvement in industry associations such as AMTA and ACIF.</p> <p>Significant developments have occurred in the development of SMS products eg. fixed SMS and Talking Text™ – SMS messaging to fixed phone lines. Consultation with customers with hearing impairment and customers who are deaf occurred during the development phase of these products.</p> |
| 4.3.8 Improve access to mobile phones for customers with a disability to trial eg. customers with hearing aid/cochlear implant who need to test a CDMA phone in an external environment for suitability before purchase | Complete | <p>A process was established in April 2003 to allow customers who use hearing aids or have a cochlear implant to test a mobile phone. Specifically customers can go to a Telstra Shop, Licensed Shop or Dealer and ask to test a CDMA handset (subject to availability). They can make an outgoing call to 125 111 from any CDMA handset for testing purposes without the handset being fully activated (subject to availability) and test incoming ring tones and voice volume levels on the handset being tried.</p> <p>The Telstra Shop, Licensed Shop or Dealer must be in a CDMA network coverage area.</p> |
| 4.3.9 Launch SMS Self-care product to enable customers with hearing impairment to conduct all regular mobile phone service transactions (bill check, recharge, service enablement) via SMS | Extensive progress | Telstra is developing Handset Self Care functionality that will allow customers to conduct transactions with Telstra via SMS. For customers who are deaf, all mobile phone transactions can now be conducted online. Telstra has also established an 'Online Assistance' service that allows customers to talk online with a customer services operator. Telstra trialed a TTY enquiry line dedicated to mobile telephone queries during the Deaflympics in January 2005. |

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| 4.3.10 Monitor developments in mobile textphones which allow real-time communication between TTYs and mobile devices, and provide recommendation to Telstra | Extensive progress | Telstra was a proactive, supportive participant in the ACIF any-to-any text connectivity working group. Telstra conducted trials of two overseas models of textphones in the Australian environment – the Textlink 9000 from the UK and the Ultratec Compact C from the USA. |
| 4.3.11 Monitor and review developments in voice activated mobile devices, and recommend on provision for customers with a vision impairment | Complete | Telstra, Nokia and Quantum issued a joint press release in May 2002 announcing the launch of Australia's first 'talking' mobile phone. At least two versions of software are available (TALX & Mobile Availability) that assist people who are blind to navigate mobile phones. |

Strategy 4.4 – Improve access to Telstra’s products and services: Mobile Services – Telstra Shops

Telstra has an extensive network of retail outlets located throughout Australia. Since the introduction of Telstra’s first Disability Action Plan in 1996 the site selection specification for all new shop leases has included accessibility criteria. Telstra’s generic shop fit out has been upgraded to include access initiatives such as improved paths of travel, provision of a consultancy desk or low counter, provision of hearing loops and visual contrasts. As existing shops are upgraded the new fit out is applied.

Telstra’s Access Advisory Panel (TAAP) has operated since 1996, acting in an advisory role to Telstra’s Accommodation Planning group on matters relating to physical access. The panel includes representation from community, professional organisations, Telstra staff, Telstra Human Resources and Telstra Property Management. A Telstra Shop Network representative within this panel ensures initiatives for Telstra Shops are addressed. In addition to the Telstra Shop Network, Telstra also has a number of privately owned retail outlets (Telstra Licensed Shops) operating under a license arrangement.

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| 4.4.1 Review and improve the range of information about products and services for people with a disability available in Telstra Shops | Complete | Copies of the new catalogue <i>Telstra Products and Services for older people and people with a disability</i> were provided to all Telstra shops for reference and to fulfil customer requests. Telstra Shops display disability related brochures in prominent areas – this varies from Shop to Shop depending on layout. It is not possible to display all brochures available in Telstra Shops but staff can order copies of all available brochures from Telstra’s distribution centre. |
| 4.4.2 Ensure Telstra Shop Network staff receive disability awareness training, including information about: <ul style="list-style-type: none"> interacting with customers with a disability the purpose and use of hearing loops access initiatives included in shop design and fit outs best practice merchandising placement for ease of access information about Telstra’s products and services for people with a disability | Extensive progress | All Telstra shop staff are required to undertake the online Disability Awareness Program. As of January 2005, 1003 staff had successfully completed the training. A summary of the Disability Awareness online course was provided to Telstra Licensed Shops and Dealers. In 2002 a comprehensive learning brief was added to the Telstra Shop online information resource outlining the purpose of the hearing loop and how to use it. Telstra Shops have experienced some technical operating problems with the hearing loops and an alternative model is being investigated. |

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| <p>4.4.3 Continue to address specific access issues for the Telstra Shop Network including merchandising placement, visual contrast and ensuring access issues are included in the Health and Safety self-audit regime by shop managers and staff</p> | <p>Complete</p> | <p>A specialist in Health and Safety conducted an independent assessment of the Health Safety & Environment (HS&E) and Disability Discrimination Act (DDA) status of Telstra Shops. A report of this assessment was included in guidelines issued to designers and architects who work on Telstra Shops.</p> <p>Regular audits are conducted on Telstra Shop accessibility. These are presented at TAAP meetings. Telstra Shop management has appointed six Health Safety & Environment (HS&E) Coordinators across Australia, responsible for conducting audits and highlighting potential HS&E or DDA issues. These are prioritised and works scheduled where practicable.</p> |
| <p>4.4.4 Ensure all new contracts for Telstra Licensed Shops include site selection criteria and specifications which comply with the access standards set for Telstra-owned shops wherever possible</p> | <p>Complete</p> | <p>New Licence Agreements for Telstra Licensed Shops include specific reference to DDA compliance being mandatory.</p> |

Strategy 4.5 – Improve access to Telstra’s products and services: Billing

Telstra has a long-standing commitment to reviewing the accessibility of its bills. Telstra provides a range of billing options for customers including Braille, large print and accessible online bills.

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| 4.5.1 Ensure any re-design of the standard bill format takes account of the needs of customers with a disability | Complete | Telstra’s Centre for Accessibility was involved in a review of the standard Telstra bill. Major changes to improve the usability of the bill were made in September 2003. A briefing pack on these changes was provided to Telstra’s Disability Forum in September 2003. |
| 4.5.2 Review and improve, as required, Telstra’s alternative format billing options including: <ul style="list-style-type: none"> • Braille bill • Big Print bill • Online bill • Single and Summary bill to ensure they are accessible for all customers including those with a disability | Complete | <p>As part of the review of the standard telephone bill, the alternative format options were also reviewed.</p> <p>Improvements to the standard bill are immediately translated into improvements in the Braille bill and large print bill as these contain the same information and layout (i.e. the large print Bill is an A3 version of standard bill).</p> |
| 4.5.3 Improve awareness of Telstra’s alternative format billing options through targeted communications eg. Radio for the Print Handicapped (RPH) announcements | Complete | <p>The print and online catalogue of <i>Telstra Products and Services for older people and people with a disability</i> includes a section on billing options. Information has been included in other Telstra material.</p> <p>Telstra Disability Services sponsored Radio for the Print Handicapped in 2003 and 2004 to produce 30 second information announcements about disability services products and services including billing options.</p> <p>In October 2004 Telstra Disability Services also included information about billing options (Braille, large print and online) in a quarterly national audiocassette magazine available to all Blind Citizens of Australia members.</p> <p>Telstra’s disability presentations to community and stakeholder groups include references to the availability of alternative format bills.</p> <p>Telstra Disability Liaison Officers and Telstra Country Wide® representatives have copies of large print bills for promotional displays.</p> |

Strategy 4.6 – Improve access to Telstra’s products and services: Other

Telstra product managers and product developers are required to complete a Disability Impact Statement as part of Telstra’s Product Development Operating Model. This online process is completed at the early stage of a product’s development to improve accessibility for people with a disability.

Telstra Disability Services, the internal (Telstra) subject matter expert (SME) area on disability related matters, assesses new products in development for Disability impact, and advises product developers of areas of potential discrimination and on avenues to minimise or eliminate any risks.

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| 4.6.1 Monitor progress of the HREOC working party activity on pay television captioning | Complete | Telstra subscribes to updates from the HREOC and has continued to monitor progress by this working party. Issues raised by this working party have also been discussed with external stakeholders including Deafness Forum and Australian Association of the Deaf. Telstra has also liaised with Foxtel® to improve awareness of issues for customers who are deaf or have hearing impairment. |
| 4.6.2 Continue to review all new products and services to assess access and equity impact for Telstra customers with a disability through submission of disability impact statements as part of Telstra’s product development process (Rapid Delivery GeniSys) | Complete | A mandatory component of Telstra’s project development process is the completion of a disability impact statement, which is reviewed by Telstra Disability Services. In 2002-2004 306 impact statements were completed and assessed. |
| 4.6.3 Provide input into Telstra’s <i>Access for Everyone</i> program to improve the affordability of telecommunications for Telstra’s low income customers with a disability | Complete | Customers with a disability who are also on a low-income are a target segment for Telstra’s <i>Access for Everyone</i> program. Information is included in <i>Access for Everyone</i> communications material relevant to low-income customers with a disability. Customers with a disability were a target group in research conducted on accessibility and affordability of telecommunications for customers on a low-income. |
| 4.6.4 Monitor the protocols put in place to ensure TTY users continue to have access to the telephone network in areas where Wireless Local Loop technology is to be deployed | Complete | Deployment began in January 2003 with protocols established. Protocols are monitored on an ongoing basis to ensure compliance. |
| 4.6.5 Continue to investigate options to support TTY devices on CDMA WLL network | Extensive progress | Telstra is a proactive, supportive participant in the Australian Communications Industry Forum (ACIF) any-to-any text connectivity working group. Telstra conducted trials of two overseas models of textphones in the Australian environment – the Textlink 9000 from the UK and the Ultratec Compact C from the US. |

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| <p>4.6.6 Ensure Telstra customers with a disability, located in rural and regional areas, receive equitable access to Telstra's products and services</p> | <p>Complete</p> | <p>Telstra now has a disability representative in each of Telstra's 46 Telstra Country Wide® (TCW) regions, each of whom has a display case of DEP equipment for mobile displays and presentations. All TCW Area General Managers have been briefed on disability products and services.</p> <p>Presentation packs have been developed for TCW staff to enable tailored community presentations about Telstra's DEP and other products and services for people with a disability. These are available from Telstra Disability Services Intranet site to ensure information remains current and relevant.</p> |

Strategy 5 – Improve access 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 quickly and effectively. If a customer is dissatisfied with the management or resolution of a complaint, it may be escalated (to a supervisor or manager) for an internal review at the customer’s request. Telstra has a formal process in place to ensure that complaints are addressed at the highest level necessary. Telstra’s complaint registration system allows disability-related data to be sourced and analysed.

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| <p>5.1 Conduct regular analysis of disability-related complaints data to identify causes and develop strategies to address any complaint patterns</p> | <p>Complete</p> | <p>Regular reviews of disability related complaints have been undertaken. Most reports have been assessed internally by the Disability Services group.</p> <p>In June 2003 Telstra Disability Services commissioned an independent consultant to undertake a comprehensive review of customer complaints about disability issues for the 12-month period July 2002 to June 2003. The objective of the analysis was to examine complaints-related data and identify systemic issues. The conclusions and recommendations from this study were reviewed and information was passed on to relevant groups for action. For example a project to improve the understanding of contracts, particularly by people with intellectual disability, was undertaken via a research study funded by Telstra into judgement related disabilities and unfair contracts.</p> <p>Regular complaint data is now provided to Disability Services. Disability complaints are reviewed and appropriate action plans are put in place. Telstra’s new complaint system Questus will allow regular reports to be downloaded. Disability Services staff were trained in this system in December 2004.</p> |
| <p>5.2 Brief complaint management 'process owners' to report on complaint patterns and increase disability awareness</p> | <p>Complete</p> | <p>Manager Disability Services briefed the Telecommunications Industry Ombudsman’s staff in August 2003, and provided information about Telstra’s products, services and activities for customers with a disability.</p> |
| <p>5.3 Ensure information about Telstra’s complaint management process is included in relevant customer communications for example, TTY telephone directory, DEP catalogue, online information</p> | <p>Complete</p> | <p>The revised disability catalogue, released in July 2003, provided information about Telstra’s complaint management process. This information is also provided online through Telstra.com.</p> <p>Information about Telstra’s complaint management process was also provided in the 2002, 2003 and 2004 editions of the TTY directory. Telstra’s Customer Service Charter includes information about how a customer can make and escalate a complaint.</p> |

Strategy 6 – Improve access for the 'online' consumer with a disability

Telstra is committed to take all reasonable steps to ensure that the content and functionality of its web presence is accessible by the widest possible number of people in the community, including those using assistive technologies such as screen readers. Telstra's Centre for Accessibility publicly launched in September 2001 assists in evaluating and improving access to Telstra's website.

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| 6.1 Conduct audits, at least annually, of Telstra web pages and publish findings internally to enhance compliance with Corporate Accessibility Standard | Complete | <p>A comprehensive benchmark review of Telstra's website was conducted by Telstra's Centre for Accessibility in March 2004 following a review in September 2002. The 2004 review demonstrated a 22 per cent improvement in accessibility compliance to the Telstra Corporate Accessibility Standard - a standard based on the W3C Web Content Accessibility Guidelines 1.0, (WCAG) requiring compliance at better than a single-A WCAG level. There has also been a marked improvement in accessibility compliance in the Telstra Products and Services and Online Billing areas of the site, due to specific attention to these areas through accessibility evaluations and advice throughout 2003-2004.</p> <p>The reviews revealed that the main accessibility issues are proper coding of online forms, appropriate alternative text for images, and accessible device independent use of scripts and programmatic objects. Legacy content and site-wide page templates pose the greatest challenge to overall accessibility compliance due to their use on all pages of Telstra's sites. Telstra's Centre for Accessibility, in conjunction with Telstra's Data & Online business, is creating a new set of templates with specific attention to accessibility, and updates to accessibility standards and training to ensure requirements continue to align with Industry best practice.</p> |
| 6.2 Review and update Telstra Standards for Accessibility, as required, and monitor adherence | Complete | <p>Telstra's Standard for Accessibility has been regularly updated and all users of online standards including external vendors have been notified of any changes when these are made. Telstra's Centre for Accessibility monitors Telstra's Internet site for adherence to accessibility standards.</p> |
| 6.3 Ensure Telstra web developers are briefed regularly on accessibility developments | Complete | <p>Telstra's Centre for Accessibility and Telstra Technologies have developed comprehensive guidelines for product developers and designers. Regular workshops on accessibility training for this group have been established.</p> |
| 6.4 Improve prominence of Disability Services page within telstra.com | Complete | <p>The prominence of Telstra Disability Services web presence has been improved by making it easier to find via the telstra.com search engine, the Home and Family site and also on the Telstra online Product catalogue site.</p> |

Strategy 7 – Improve access to Telstra’s facilities

An audit of Telstra buildings and facilities commenced in 1996. Works programs have been completed for each State covering those buildings that have a high profile or high public usage.

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| 7.1 Continue auditing leased and owned properties to assess accessibility and compliance with the DDA, and maintain an ongoing program of work to rectify non-compliance | Complete | Telstra’s Access Advisory Panel (TAAP) met regularly during 2002-04. The panel has included representatives from across Telstra and external community, disability and industry representatives. TAAP advises on policy and implementation of works arising from DDA accessibility audits of Telstra premises. Telstra’s DDA property audits are ongoing, funded from capital works each year. |
| 7.2 Ensure new leasing is, wherever possible, within compliant buildings or seek rectification of non-compliant issues prior to lease commencement | Complete | All new buildings are assessed for DDA compliance and are reported at TAAP meetings. Standard lease documents require DDA compliance. Existing leases are not extended unless DDA requirements are met. |
| 7.3 Ensure all new office fit-outs are completed in accordance with Australian Standard for Design for Access and Mobility (AS1428.2) | Complete | Telstra policy is that all new office fit-outs meet accessibility guidelines. |
| 7.4 Implement regular programs of access awareness training for property Service Providers, Telstra Property Vendor managers, Telstra Shop Network staff | Complete | TAAP members include service providers, Telstra Property Vendor managers and Telstra Shop staff responsible for property related decisions. Expert briefings by external consultants occur at these meetings. Industry related information and awareness material is regularly distributed to TAAP members. A property management training program has been developed for property management staff. |
| 7.5 In conjunction with Corporate Human Relations, Health and Safety establish accessibility as part of the routine Health and Safety self-assessment checklists | Complete | This item was discussed in detail at TAAP meetings. Amendments were made in September 2004 based on TAAP members' recommendations. |

Strategy 8 – Maintain Telstra’s commitment to the elimination of discrimination in the workplace in accordance with its Equal Employment Opportunity (EEO) policy

The intent of Telstra’s Equal Opportunity (EEO) policy is to provide an employment environment that realises the principles of equal opportunity and affirmative action for designated groups. Telstra has a long and proud record of implementing practical programs with the goal of attracting and retaining the best and brightest talents regardless of attributes such as gender, race, religion or disability. Telstra submits an annual EEO Report to the Minister for Communications, Information Technology and the Arts. This report is available at

http://www.telstra.com.au/abouttelstra/csr/reporting_performance/reports.cfm

| Action | Status | Comments |
|---------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.1 Continue to ensure all Telstra employment policies and practices are non-discriminatory | Complete | <p>Telstra’s employment policies and practices are non-discriminatory. Telstra managers have accountability for Equal Employment Opportunity (EEO) actions and outcomes (including disability) in their job descriptions.</p> <p>Telstra regularly conducts reviews to ensure equal access and opportunities for all employees. Workplace initiatives and support have included:</p> <ul style="list-style-type: none"> • Improved building access • Provision of adaptive software to enhance access to Telstra’s Standard Operating Environment • Production of training material in Braille • Alterations to hours of work and duties • Opportunities to work from home • Alignment of systems and training for staff with learning disability • Job-sharing to assist return to work programs • Provision of AUSLAN interpreters in the workplace and for staff forums. |
| 8.2 Continue to include DDA awareness in all employment policies and procedures | Complete | <p>Telstra’s EEO and Diversity strategy includes reviews of policies and procedures, development of corporate compliance and training programs and provision of specialist services on EEO and diversity issues. Disability (DDA) awareness forms a key part of this strategy.</p> |
| 8.3 Maintain and update as required Telstra’s EEO Disability Statement | Complete | <p>Telstra’s EEO Disability Statement forms a key strategy within Telstra’s Diversity Statement. Telstra’s commitment to Diversity in employment has been communicated to managers and staff via training awareness programs, staff communications and staff information seminars.</p> |

| Action | Status | Comments |
|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.4 Increase the recruitment of people with a disability | Extensive progress | <p>In 2001 – 2002 representation of people with a disability decreased by 0.04 per cent to 2.64 per cent. However people with a disability's share of recruitment increased by 1.65 per cent to 1.85 per cent. In 2002-2003 representation of people with a disability decreased from 2.64 per cent to 2.57 per cent.</p> <p>In 2003 – 2004 representation decreased by 0.39 per cent to 2.18 per cent. The representation of people with a disability in the total workforce for the period was impacted by the integration of NDC Ltd employees. Recruitment figures have decreased for people with a disability by 2.18 per cent to 0.45 per cent.</p> <p>In 2002 – 2004 initiatives to include the participation of people with a disability included:</p> <ul style="list-style-type: none"> • diversity projects • two Equal Employment Opportunity scholarships were awarded to students with a disability each year. In 2004, the scholarships were aligned with the Telstra graduate recruitment program, to encourage students with a disability to consider Telstra as an employer • a Transitional Employment Program in partnership with the Mental Illness Fellowship of Victoria's Bromhan Place Clubhouse • the ongoing employment of six athletes through Telstra's Paralympic Employment Program (PEP). |
| 8.5 Promote work training/work experience/mentoring programs and other activities to develop skills and abilities for people with a disability | Complete | <p>Telstra undertook the following programs during 2002-04:</p> <ul style="list-style-type: none"> • provided support and training to students with a disability through the <i>Willing and Able Mentoring Program</i> in partnership with Deakin University and Diversity @ Work • training and employment opportunities for people with a disability in the IT industry via Telstra's <i>Partnership Training Program (PTP)</i> • a range of programs to improve and develop individual skills of staff with a disability including training, mentoring, and creating networking opportunities. |

4. Progress Against the Key Performance Indicators

Telstra's third Plan contained three Key Performance Indicators (KPI's) against which performance could be measured at the completion of the Plan. These were:

- 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.

This section reports on Telstra's performance against these indicators in 2002-2004.

4.1 Improved Customer Satisfaction

Telstra measures customer satisfaction in a number of ways.

Disability Enquiry Hotline Annual Market Research

Telstra's Disability Enquiry Hotline staff provide specialist advice to customers with a disability about Telstra's DEP and other Telstra products and services that may provide solutions to their communications needs. Telstra conducts annual market research with callers to the Disability Enquiry Hotline to measure customer satisfaction with the service.

In the 2003 market research, 85 per cent of callers rated the overall quality of the service as 'above average' which is consistent with the 2004 result where 83 per cent of callers rated the overall quality of the service as 'above average'.

Eighty-five per cent of customers who were interviewed in 2004 agreed that the product provided met their needs and expectations, compared with 78 per cent in 2003.

Eighty-five per cent of those surveyed in 2004 agreed that the requested product was delivered in agreed timeframes, compared with the 74 per cent result received in the survey in 2003.

Directory Assistance Helpline Market Research

Telstra's Directory Assistance Helpline is an operator-assisted service for Telstra customers with a disability who are unable to use or hold a printed directory, or use the standard Directory Assistance service. Telstra conducts Market Research with a sample of users of the service every two years.

Market Research undertaken in September 2003 with 200 Directory Assistance Helpline users showed 89 per cent of users rated the service they received as very good/excellent.

Disability Complaint Management

Disability-related complaints are recorded in Telstra's complaint management database and are monitored by Telstra Disability Services. Additionally Telstra's Disability Services Unit commissioned reports to investigate root causes of disability-related complaints. Findings from these studies indicate that customers with a disability generally appear to experience the same issues that cause complaints as the broader Telstra customer base.

An independent study report of 12 months complaints data, conducted in 2003, found that 526 or 0.34 per cent of the total complaints recorded, mentioned in some way, customer issues relating to disability. Key issues identified included: Service (including delays in fault repairs) (26 per cent); Bill-

ing (19.3 per cent); Contracts (9.8 per cent); Equipment (9 per cent) and Safety (8.7 per cent). Complaints about billing and credit management, which dominated previous studies, decreased. However, billing for specific services, such as 190x Premium Rate Services and some confusion over charges for disability equipment remained at earlier levels.

The issues raised in the study report confirmed to Telstra the need for ongoing monitoring of the needs of customers with a disability, noting that many of the complaints could be addressed by reinforcing to staff to refer customers to the Disability Enquiry Hotline; for procedures to be adhered to; and recommended additional coaching for consultants about interacting with people with a disability. The conclusions and recommendations to address issues that were identified in the report were forwarded to appropriate Telstra areas for further action.

4.2 Improved customer awareness of Telstra’s services for customers with a disability

Telstra has undertaken a range of sponsorships and advertising in the period of the third Plan to increase customer awareness of Telstra’s services for customers with a disability (for a list of these see action 3.1). Telstra has also increased the range of promotional material and information about its DEP and other services for customers with a disability over the period of the third Plan (see action 3.2). Telstra measures customers’ awareness of its services for customers with a disability in a number of ways.

General Consumer Awareness

Telstra regularly undertakes research amongst customers to assess the level of awareness among customers about Telstra’s products and services including Telstra services for people with a disability. In November 2002 64 per cent of those surveyed were aware Telstra offered specialised products and services for customers with a disability. In October 2003 Telstra split those surveyed into metropolitan and regional customers, the results showing very high awareness levels with 75 per cent of metropolitan people surveyed aware of these services and 79 per cent of non-metropolitan respondents aware of these services. While the August 2004 survey showed a decline in awareness compared to the previous year’s survey – 66 per cent of metropolitan people and 54 per cent of non-metropolitan respondents - the results were significantly higher than for most other questions in the survey. Telstra Disability Services will continue to promote its products and services for people with a disability, to ensure a high level of awareness about its disability services among people with a disability, their carers, and the general community.

Take-up of Telstra services for people with a disability

In 2001-02 Telstra provisioned 36,557 pieces of specialised equipment through the DEP. In 2002-03, 33,812 pieces were provisioned and in 2003-04 13,484 pieces of specialised equipment were provided through the DEP. The significant decline in specialised equipment being provisioned through the DEP is due to the introduction of a new standard rental phone in July 2003. The new phone, the T1000S incorporates many universal design features including volume control as a standard feature for the first time. With the introduction of this phone there has been a significant decrease in the number of customers requiring specialist equipment to access the standard phone service.

Telstra supplies bills in a range of formats for people with a disability including Braille, large print and accessible bills online. The average number of bills issued in alternate formats was:

| Year | Braille Bill | Large Print Bill |
|-------------|---------------------|-------------------------|
| 2001-2002 | 118 | 377 |
| 2002-2003 | 128 | 481 |
| 2003-2004 | 123 | 625 |

Telstra’s experience is indicating that the number of Braille bills issued each month is not likely to increase as customers who are blind or have vision impairment can access their bill online with as-

sistive technology. Telstra is pleased by the continual increase of customers who receive their bill in large print.

4.3 Improved feedback from disability stakeholders on Telstra’s services for people with a disability.

Telstra’s Disability Forum meets twice-yearly in person and as required via audio-conference. This formal consultation program provides a practical and effective forum for dialogue between Telstra’s Business Units and customers with a disability. Representatives on Telstra’s Disability Forum come from a broad cross-section of national peak disability organisations. The relationship between these organisations and Telstra has been positive and there is sufficient trust and respect to allow discussion of a range of important and sometimes sensitive issues and programs.

Telstra seeks direct feedback from Disability Forum participants at the conclusion of each twice-yearly meeting. In addition to a general review on the effectiveness of each Forum held, in order to improve the structure, content and logistics for future Forums, the following, more encompassing question about Telstra’s services for people with a disability were asked of Forum members at the September 2003 and September 2004 Forums:

Review of Telstra’s Services for People with a Disability:

Considering:

- today’s briefings and discussions,
- other dialogue at and since Telstra’s Disability Forums held (in March 2003; and September 2003 and March 2004 respectively) and
- any feedback from your own constituents,

Would you say that Telstra’s services for people with a disability during that time have:

- Improved significantly
- Improved to some extent
- Remained the same
- Worsened to some extent
- Worsened significantly

The results were as follows:

| | September 2003 | September 2004 |
|--------------------------------------------------|----------------|----------------|
| <input type="checkbox"/> Improved significantly | 20% | 38% |
| <input type="checkbox"/> Improved to some extent | 70% | 62% |
| <input type="checkbox"/> Remained the same | 10% | - |
| <input type="checkbox"/> Worsened to some extent | - | - |
| <input type="checkbox"/> Worsened significantly | - | - |

5. Future Direction

Telstra is proud of its achievements as a corporate leader in the area of disability planning and initiatives. However we acknowledge that our efforts are incremental and there is still much to do to ensure that all people, including people with a disability, have equal access to our products, services and information.

Telstra will develop a fourth Disability Action Plan to build on the work undertaken in the last nine years through our three previous Plans.

As a living document, the fourth Plan will continue to take into account the fast-changing nature of telecommunications products and how they are transforming the lives of all consumers. Telstra will continue to consult widely with peak disability bodies as it develops and implements its fourth Plan.

Published by Telstra Disability Services
Freepost: Reply Paid 2474, Locked Bag 4960
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A copy of this report is accessible from www.telstra.com.au/disability. Other alternative formats are available on request from Telstra Disability Services.

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

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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Appendix One: Letter from Halliday's Business Insights

susan halliday

Halliday's Business Insights Pty Ltd

ABN – 84080960005

Mr Bert Ciavarra
Manager Disability Services
Telstra Corporate Relations
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Review Report to the Human Rights and Equal Opportunity Commission Telstra's Third Disability Action Plan 2002 – 2004

The Review of Telstra's Third Disability Action Plan 2002 – 2004 has been finalised. A summary scorecard has been attached to this correspondence. Of the 76 actions detailed in the Plan, 70 fall into the category of COMPLETE (92 %) and 6 evidence sufficient activity to rate EXTENSIVE PROGRESS (8 %). The 6 actions were 4.1.1, 4.3.9, 4.3.10, 4.4.2, 4.6.5, and 8.4

Conducted during February and March 2005, the Review did not include a qualitative assessment, rather the Review was conducted via the examination of documentation presented by Telstra.

Having reviewed earlier Telstra Disability Action Plans it is clear that the actions of the third Plan built, in a most constructive way, upon earlier work. The actions detailed in the third Plan were realistic, needs focused and plentiful. An exceptional amount of work has been undertaken by the Disability Services Unit, and others in Telstra, to achieve the scorecard ratings recorded.

There is also evidence that as new and unexpected issues and opportunities arose, that they were tackled by the Disability Services Unit, in addition to the 76 actions detailed in the Plan. Further there is evidence of a sophisticated flexible approach to ever evolving circumstance and technology, and at the point in time where an action may have become redundant, or possibly superseded by a better option, the Unit took the initiative to progress an alternative action, or a more contemporary option, rather than simply consider the original action defunct.

A number of the actions detailed in the third Plan were generic to the aims of a Disability Action Plan and should of course be repeated in the fourth Plan. That said, a high number of these generic actions were rated as COMPLETE for the third Plan, due to the amount of work undertaken.

(signed)

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