

Telstra Corporation

Telstra Disability Action Plan

1996-1998

Foreword Statement

I have the pleasure of presenting to you Telstra's Disability Action Plan, which has been developed in consultation with consumer and disability organisations and the Human Rights and Equal Opportunity Commission.

The Disability Action Plan complements Telstra's Corporate Disability Policy which will put into effect the basic principle underlying the *Disability Discrimination Act 1992*, that people with a disability have the same fundamental rights as the rest of the community. Implementation of the Action Plan will assist Telstra to minimise and, where possible, eliminate discriminatory practices and/ or obstacles to the achievement of this objective through effective planning, performance and accountability requirements.

Improving the accessibility of Telstra's products and services to people with a disability will not be without its challenges as Telstra operates within an increasingly competitive and rapidly changing environment. Telstra values its consultative relationship with consumer and disability organisations and welcomes community input to its activities to enable the views of people with a disability to be heard in a meaningful and constructive way.

The initiatives outlined in the Action Plan will not only improve the accessibility of our products, services and facilities to people with a disability but ensure that Telstra continues to be a leading edge telecommunications and information services company, delivering a quality service to **all** Australians.

I look forward to the continued improvement to be gained for our customers and our business by the achievement of Telstra's Disability Action Plan.

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Section One: Purpose

1. Purpose

The *Disability Discrimination Act 1992* came into effect in March 1993 making it unlawful to discriminate against people on the basis that they have, or may have, a disability. It makes provision in Part Three for a service provider, such as Telstra, to prepare and implement an Action Plan, which may also be lodged with the Human Rights and Equal Opportunity Commission (HREOC). The Commonwealth Disability Strategy, adopted by Cabinet in December 1994 further recommends that all Commonwealth Departments and authorities lodge an Action Plan with the HREOC by January, 1997.

An Action Plan is intended to assist in achieving the principle underlying the Disability Discrimination Act (DDA) - **that people with a disability have the same fundamental rights as the rest of the community**. An Action Plan is a means for identifying areas of potential discrimination in the delivery of products, services and facilities (or buildings) and for developing an Implementation Plan to address the issues raised. Through effective planning, performance and accountability requirements, the Action Plan will help Telstra, where possible, to eliminate discriminatory practices or obstacles to the achievement of the above principle.

While it is not mandatory to prepare an Action Plan under the DDA, the implementation of an Action Plan will make it less likely for discrimination to occur, therefore reducing the risk of legal action. More importantly, the development of a Disability Action Plan will show how Telstra will:

- fulfil its social obligations as defined in both the DDA and the Commonwealth Disability Strategy;
- ensure the needs of people with a disability are considered in future planning activities of Telstra; and
- communicate these intentions to the community.

Background

Over the years Telstra has had a strong involvement in meeting the needs of people with a disability. In 1981 'The International Year of Disabled' Telstra introduced a range of specialised products to assist people in using the standard telephone. In June 1988 Telstra established a dedicated Disabilities Programs unit within its corporate structure, which has the responsibility for formulating policy and the direction of disability activities within Telstra. An Aged and Disability Centre was also established in each state capital city and these continue to provide practical day to day help to people with special telecommunications needs.

Today Telstra has disability programs which provide support totalling millions of dollars in the form of funding and sponsorship for disability groups, concessions on a range of disability products and services and support services. For example, Telstra has a TTY Enquiry Line (FREECALL™ 1800 808 981) for Deaf and hearing impaired people, a Disability Enquiry Hotline (FREECALL™ 1800 068 424) which provides specialist telecommunications information for people with a disability, and modified payphones, including 70 TTY payphones already deployed around the country.

Telstra has an Equal Employment Opportunity program committed to the elimination of any discrimination within Telstra in employment and customer service. As part of a comprehensive Equal Employment Opportunity program, Telstra has an Employment Placement Program with the responsibility for increasing the awareness and acceptance of people with a disability within Telstra and also to actively promote the employment of people with a disability within the organisation. This also helps in raising the awareness of the needs of people with a disability.

An internal working group was established in August 1995 to review Telstra's obligations under the DDA. This group recommended the preparation of a Disability Action Plan and this action was endorsed by senior management.

Scope

In accordance with Section 61 of the DDA, the action plan of a service provider must include provisions relating to:

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

Telstra's Disability Action Plan aims to meet these provisions. The Plan adopts the definition of disability as used in the Disability Discrimination Act 1992. This definition is very broad and includes: physical, intellectual, psychiatric, sensory and neurological. It also covers physical disfigurement and the presence in the body of an organism capable of causing disease, such as HIV. It is worth noting the broadness of this definition as people sometimes limit their understanding of disability to someone in a wheelchair.

Telstra's Disability Action Plan aims to address present and planned products and services, policies and facilities. The Plan encompasses Telstra's role as a provider of goods and services as well as that of an employer and will recommend initiatives which:

- recognise the provisions of the Disability Discrimination Act;
- build upon the existing programs and services Telstra provides for people with a disability;
- can be implemented in the time frame allocated;
- are considered to be realistic and achievable goals;
- are technically feasible within the current environment;
- are financially responsible;
- are consistent with Telstra's existing Corporate policies and objectives; and
- are consistent with improved customer service for all Australians.

The Action Plan is a dynamic document and will be reviewed regularly, with an assessment of the implementation process to take place after two years. Amendments may occur in the following circumstances:

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

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

Section Two: Mission Statement

2. Disability Mission Statement

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

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

Means of Achieving Objectives

Through the Action Plan Telstra aims to:

- develop policies and procedures to incorporate compliance with the DDA into the normal business planning of all Telstra business units;
- identify and where possible eliminate, in an appropriate and reasonable time frame, any discriminatory practices;
- ensure all management and staff understand the principles of DDA compliance;
- encourage compliance with the DDA so that services are made accessible for the greatest possible number of people in a practical and cost-effective manner;
- establish Telstra as a socially responsible organisation committed to the principles of Access and Equity;
- ensure ongoing consultation with representatives of the disability community on issues of concern to people with a disability.

Section Three: Customer Profile

3. Number of People with a Disability

The Australian Bureau of Statistics, "*Survey of Disability, Ageing and Carers (1993)*", provides estimates for Australia on the numbers and characteristics of persons with disabilities, persons with handicaps, persons aged 60 years or more and people who are carers in Australia.

The following is a summary of the results from this survey:

- it was estimated in 1993 that 18.0% of the Australian population (3.2 million people) had a disability and 14.2% of the total population were classified as having a handicap (not all people who regard themselves as having a disability, regard themselves as handicapped);
- 78.7% of those people with a disability also had a handicap;
- 4.1% of the Australian population required considerable assistance from others to perform daily tasks (profound and severe handicap), 2.6% had moderate handicap (needed no help but had difficulty with tasks), and 5.3% had a mild handicap (had no difficulty with tasks, but required assistance to perform tasks);
- the vast majority of people with a disability live in private households (95.0%) with 18.7% of these people living alone;
- the incidence of disability increases dramatically with age resulting in a population age structure that is almost the reverse of the general population (some 50% of persons aged 60 or more have a disability), and
- of the Australian population aged 15 years or more, 4.2% were principal carers (those who have major responsibility for care of another person in the areas of self-care, mobility or verbal communication).

The major shortcomings of the above information for Telstra is that it is a 'self-report' study relying on a 'medical' or 'clinical' definition of disability. Many people would not identify themselves with this definition, yet may have functional difficulties in using telecommunications products and services. However it is obvious that people with a disability represent a large and important segment of the population.

Range of Disabilities

Using the telephone involves physical and sensory abilities that people possess to varying degrees. The ability to lift and hold the receiver, to dial, to hear the other person's voice and the ringing of the telephone, and to speak at a level that can be heard clearly are all essential to a satisfactory telephone conversation. A person's telecommunications needs may be unique and may require a combination of services.

In Telstra's experience the largest two relevant segments for people with a disability who experience difficulty with telecommunications are:

- persons with a hearing impairment, and
- persons who are severely/profoundly deaf.

Much smaller segments in order of size are:

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

In developing the Action Plan Telstra has also considered other issues, including the particular needs of older people. Telstra recognises both the wide range of disabilities and the diverse needs of people with a disability. Within any particular type of disability eg. hearing loss, there are many differences that affect an individual's ability to function and adapt - age of onset, severity of the impairment, availability of training or rehabilitation, degree of support from family and friends etc. Many people may also have more than one disability. Of importance also is that the telecommunications industry is in a state of constant change and technological advances are occurring all the time, making it necessary for Telstra to monitor technological and industry developments and their impact, if any, on people with a disability.

Telstra currently provides a range of specialist equipment to assist people in using the telephone and because of the great diversity in the telecommunications needs of people with a disability will continue to build on its existing body of research to gain a better understanding of these needs.

Section Four: The Process - Action Plan Development

4. The Process

Initial Review

The development of Telstra's Disability Action Plan commenced with an initial review of what were considered the most relevant policies, products and services across the organisation. The aim of this review was to:

- identify priorities;
- estimate the costs to the corporation of DDA compliance;
- establish a platform from which meaningful discussions with consumer representatives could be achieved; and
- establish benchmarks for what constitutes reasonable compliance.

This approach enabled priority areas for action to be identified. A progressive review of other products and services will continue over time as part of the Action Plan implementation process.

Consultation

Internal Consultation

A Project Manager, within Telstra's Office of Customer Affairs, was appointed to coordinate the Action Plan development. An internal working group, the DDA Compliance Group was established with representation from across the organisation including Disability Services, Payphone Services, Property Services, Operator Assisted Services, Product Development, Retail Products including mobiles, Consumer Relations, Equal Employment Opportunity, Regulatory, Corporate Planning and other areas as required.

A valuable source of information for Telstra was the use of a number of internal focus groups made up of Telstra employees with a disability. The groups were useful in gathering information on priority areas for review.

External Consultation

Consultation with the community was an ongoing feature of the development process. Telstra's existing consultative process was utilised via the Disability Services Consultative Committee (DSCC) of the Telstra Consumer Consultative Council. The DSCC is made up of representatives from the following organisations; the Australian Association for the Deaf (AAD), ACROD - National Industry Association for Disability Services, National Caucus of Disability Consumer Organisations, National Federation of Blind Citizens of Australia (NFBCA), and Consumers' Telecommunications Network (CTN). An additional representative from Communications Aids Users Society (CAUS) has been included on the committee for the Action Plan discussions. Regular meetings of the DSCC were held to establish priorities and to discuss the Action Plan development at progressive stages.

Further consultation took place with the Human Rights and Equal Opportunity Commission, specialist disability consultants and industry representatives as required. Independent audits by experts in disability services were undertaken where necessary, to identify access and mobility barriers. This advice was particularly useful in assessing the accessibility of Telstra's payphones and buildings.

Evaluation Process

Telstra has utilised the expertise of its internal working group, the feedback received from consultation with consumers on what constitutes 'reasonable compliance' under the DDA and advice from expert consultants in the field of disability services to establish a framework for assessing compliance and to develop appropriate programs.

This consultation will continue throughout the implementation of Telstra's Disability Action Plan (Refer Section 8: Monitoring and Evaluation).

Section Five: Key Strategies

- 1. Develop a Telstra Corporate Disability Policy and DDA compliance program.**
- 2. Develop a Disability Awareness Program for all staff.**
- 3. Ensure ongoing community consultation and consideration of developments external to Telstra.**
- 4. Improve Accessibility to Telstra's buildings and facilities.**
- 5. Improve Accessibility to information for people with a disability.**
- 6. Improve Accessibility to Telstra's new products and services.**
- 7. Improve Accessibility to Telstra's existing Products and Services including:**
 - standard telephone service;**
 - payphone services;**
 - operator assisted services;**
 - directory services;**
 - mobile communication services, and**
 - other products and services.**
- 8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with the EEO policy.**
- 9. Incorporate DDA requirements into existing Telstra policies and programs.**

Strategy 1: Develop a Telstra Corporate Disability Policy and DDA compliance program.

Action	Responsibility	Time Frame	Outcome
<p>1.1 Endorsement of Corporate Disability Policy for inclusion in Telstra's Corporate Policy Manual</p>	Disability Services	December 1996	To obtain senior level understanding and endorsement of Telstra's DDA compliance program.
<p>1.2 Develop a Disability Compliance Manual to support the Disability Policy. To include:</p> <ul style="list-style-type: none"> • Disability product policy (including TTY Program and revised Disability Tariff Concession Policy); • Guidelines for product and policy development, information and promotional material; • Outline of management and staff compliance responsibilities; • Inclusion of DDA compliance in relevant staff manuals. 	Disability Services	June 1997	Provide a framework for DDA compliance throughout the corporation.

Strategy 2: Develop a disability awareness program for all staff

Action	Responsibility	Time frame	Outcome
<p>2.1 Develop and implement a comprehensive disability awareness program for all staff Develop and distribute information in a variety of forms to all staff. Include all key internal publications, newsletters, bulletins and learning briefs. Key staff and management involved in the implementation of the Action Plan and those in customer service areas will be targeted first.</p>	<ul style="list-style-type: none"> • Disability Services • Staff Communications 	December 1997 (Staged process commencing in November 1996)	Improved staff attitudes and staff awareness about the DDA and issues affecting people with a disability.
Disseminate Telstra's Disability Policy and Compliance manual to all staff.	Disability Services	June 1997	All staff informed of the rights and responsibilities which arise under the DDA.
Integrate DDA principles and responsibilities and update all relevant existing training modules (including Induction Training, EEO Training etc).	<ul style="list-style-type: none"> • Telstra Learning • Disability Services 	December 1997	Ensure the requirements of the DDA are understood by staff attending these courses.
Review and update the existing Disability Awareness training module.	<ul style="list-style-type: none"> • Telstra Learning • Disability Services 	December 1997	Disability Awareness module could be included in various training courses to educate staff.
Distribute information in a variety of forms through staff communications channels as part of an ongoing disability awareness program.	<ul style="list-style-type: none"> • Disability Services • Staff Communications 	Ongoing	Ensure continuing improvement in staff attitudes and knowledge.
<p>2.2 Implement a series of information workshops and presentations for Telstra management, product managers and product developers.</p>	<ul style="list-style-type: none"> • Disability Services • Legal Directorate • NTG 	Commence January 1997	Ensure the requirements of the DDA and the needs of people with a disability are understood by product designers and management. Encourage the recognition of opportunities to improve the accessibility of existing products. Ensure the needs of people with a disability are understood by external suppliers on whom Telstra relies.

Strategy 3: Ensure ongoing community consultation and consideration of developments external to Telstra.

Action	Responsibility	Time Frame	Outcome
3.1 Continue ongoing community consultation on issues affecting people with a disability.	<ul style="list-style-type: none"> • Consumer Affairs (includes Disability Services) 	Ongoing	Improved awareness within Telstra of the needs and issues affecting people with a disability.
3.2 Periodically update Telstra's catalogue of DDA resource material.	Disability Services	Ongoing	Ensure Telstra is aware of the changing legal and regulatory environment.
Review regularly, new technology developments and global trends in telecommunications for people with a disability. Disseminate information to product managers. Monitor the development of any Disability Standards under the DDA.	Disability Services	Ongoing	Ensure product planning areas are aware of the changes in technology of relevance to people with a disability.
3.3 Undertake periodic research projects to monitor the needs of people with a disability in accessing telecommunications.	<ul style="list-style-type: none"> • Disability Services • Telstra Consumer Consultative Council Research 	Ongoing	Ongoing monitoring of the needs of people with a disability.

Strategy 4: Improve accessibility to Telstra's buildings and facilities

Action	Responsibility	Time Frame	Outcome
<p>4.1 Review Property Services practices to identify areas for reform. Develop building audit process</p>	Property Services	October 1996	To provide a mechanism to identify access restrictions to and within Telstra buildings.
Conduct examination of all buildings leased and owned by Telstra to assess accessibility and compliance to requirements of the DDA.	Property Services	November 1996 and ongoing	To identify barriers to access by employees and customers with a disability and provide an estimate of expected costs for modifications, facilitating the development of a 10 year program of capital works.
Review pre-leasing assessment forms	Property Services	Complete	Eliminate possibility of leasing buildings with barriers for people with a disability.
Review building and construction office fit out practices and procedures to determine adequacy in eliminating access limitations.	Property Services	Complete	Ensure all new accommodation works meet access standards.
<p>4.2 Development of a Corporate Access Policy Establish an Access Advisory Panel to consult on issues of policy formulation, defining '<i>reasonable adjustment</i>' for individual applications, prioritising capital works program and reviewing the development and refinement of the Access Action Plan.</p>	Property Services	December 1996	To enable consultation with staff representatives, disability groups, representative bodies and industry experts.
Formulation of a Corporate Access Policy in consultation with the Access Advisory Panel.	Property Services	March 1997	Policy will provide Telstra with guidelines for an accessible work environment and accessible retail outlets. The policy will be a reference point for Telstra Property Services staff.
Include Accessibility within the Corporation's "Accommodation Guidelines".	Property Services	Complete	Ensure all new accommodation fit out and/or building construction complies with the requirements of the DDA.

Action	Responsibility	Time Frame	Outcome
<p>4.3 Communicate access policies and practices to relevant staff. Develop and implement a staff training and awareness program for all staff involved in managing Telstra's building portfolio.</p>	Property Services	May 1997	<ul style="list-style-type: none"> • To enable all staff to recognise and eliminate barriers to access and develop appropriate means of providing non-discriminatory access. • To improve attitudes to and awareness of people with a disability.
<p>4.4 Develop and implement a Works Program (to include targeted completion dates)</p> <ul style="list-style-type: none"> • Establish specific action schedules for each building • Prioritise buildings for upgrades • Include funding for Access Action Plan in annual business plans and budgets, including a contingency fund for unexpected adjustments. 	Property Services	10 Year Implementation Plan 1996 - 2006	<ul style="list-style-type: none"> • Continual modification of existing buildings to accommodate Telstra employees with a disability. • Progressive upgrade of all other buildings over a 10 year period.
<p>4.5 Establish a process for reviewing any complaints/suggestions regarding Telstra's Access Plan and communicate this to staff and customers.</p>	Property Services	March 1997	Ensure any concerns from employees or customers with a disability are investigated promptly.

Reference: Telstra's Access Action Plan

Strategy 5: Improve accessibility to information for people with a disability

Action	Responsibility	Time Frame	Outcome
5.1 Ensure the continuation of equitable access to Telstra's customer services.	Front Office Operations Support	Ongoing	Improved accessibility to Telstra's services
Extend the operating hours of Telstra's National TTY Enquiry Line to 6am - 9pm, 7 days per week.	Front Office Operations Support	Complete	Improved service to Deaf and speech-impaired TTY users.
Include the National TTY Enquiry Line in standard monitoring programs for customer service levels.	Front Office Operations Support	December 1996	Ensure a consistent level of service for TTY users.
Advertise Telstra's TTY Enquiry Line in all key corporate publications including the TTY Directory, Guide to Using Telstra's Telephone Services and the White Pages Directory etc.	Disability Services	Complete	Increased awareness of Telstra's TTY lines.
Provide Telstra's Aged and Disability Centres with a central TTY enquiry number.	Disability Services	Complete	Increased accessibility to Telstra's disability services for TTY users.
Ensure staff at all Telstra TTY lines receive regular TTY training.	<ul style="list-style-type: none"> • Disability Services • Management of all TTY Enquiry Lines 	Ongoing	Ensure a consistent level of service is provided to TTY users.
Investigate modem access and electronic customer access to Telstra's customer services.	<ul style="list-style-type: none"> • Disability Services • Front Office Operations Support 	October 1997	Improved accessibility to Telstra's services
5.2 Develop information materials in a range of alternative formats. Develop a brochure to include information about Telstra's products and services for people with a disability including enquiry numbers.	Disability Services	June 1997	Improved access to information about Telstra's services, for people with a disability.

Develop the brochure in alternative formats for people with a print disability.	Disability Services	June 1997	More accessible information for people with a print handicap.
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Action	Responsibility	Time Frame	Outcome
Assess the need to provide information in languages other than English.	Disability Services	September 1997	To gain an understanding of needs, in order of priority, for people from a non-English speaking background. Improved accessibility to information for people with a disability.
5.3 Consider the provision of key information and promotional material in alternative formats.	Disability Services	Ongoing	
Develop the TTY Directory in braille.	Disability Services	Complete	
Consider the provision of ' <i>Guide to Using Telstra's Telephone Services</i> ' in alternative formats including large print, disk, via the Internet and braille.	<ul style="list-style-type: none"> • Disability Services • Consumer Affairs 	April 1997	
Ensure captions are provided on all Telstra's television advertisements, including voice overs.	Marketing Communications, RP&M	Ongoing	
Review the accessibility to people with a disability of information Telstra provides via the Internet.	<ul style="list-style-type: none"> • Disability Services • Telstra Multi-Media 	July 1997	
Produce a large print version of the standard telephone user guide.	<ul style="list-style-type: none"> • Disability Services • CPE Group 	March 1997	
Establish a process for reviewing requests for converting other key information into alternative formats on request (eg. AUSLAN video), and maintenance of appropriate funding.	Disability Services	June 1997	
5.4 When completed, review the recommendations of the National Federation of Blind Citizens of Australia (NFBCA) report 'Consumer Information Project'.	Disability Services	June 1997	

Reference: Telstra Disability Compliance Manual

Strategy 6: Improve Accessibility to Telstra's New Products and Services

Action	Responsibility	Time Frame	Outcome
<p>6.1 Ensure all new products and services are assessed for potential accessibility to persons with a disability.</p>	<ul style="list-style-type: none"> • Disability Services • Network Technology Group • RP&M 	December 1996	All new products will be assessed for DDA compliance as part of Telstra's product development process.
<p>All product managers and product developers will be required to complete a Disability Impact Assessment as part of the product development process.</p>	<ul style="list-style-type: none"> • Network Technology Group • RP&M 	December 1996	DDA compliance is formally addressed by all product developers.
<p>6.2 Include people with a disability, wherever possible, in the useability testing for new products. Where applicable, utilise people with a disability for focus groups, prototype testing, market testing and product trials.</p>	<ul style="list-style-type: none"> • Network Technology Group • RP&M 	December 1996	Ensure the users of products have input to their design.
<p>6.3 Explore the opportunity for people with a disability to take part in the trial of equipment as part of the Personal Communication System (PCS) trial.</p>	Retail Products and Marketing	12 month trial to commence late 1996.	To improve access to PCS for people with a disability.

Reference: Disability Compliance Manual

Strategy 7: To improve Accessibility to Telstra's Existing Products and Services
- Customer Premises Equipment

Action	Responsibility	Time Frame	Outcome
7.1 Establish a TTY Voucher Scheme to provide TTYs or modems to the profoundly deaf and speech-impaired who are not eligible under the Government TEA Program.	Disability Services	Complete	Increased the accessibility to the network for Deaf and speech-impaired users.
Promote the Telstra TTY Program through specialist disability publications and by direct mailing associations who deal with the Deaf, hearing impaired and speech impaired.	Disability Services	Ongoing	Increased the awareness of Telstra's TTY Program to potential users.
Provide information to Telstra's TTY Enquiry Line staff to deal with enquiries regarding the Program.	Disability Services	Ongoing	Ensure a consistent level of service to TTY users.
Provide an information brief to all Telstra front line staff to advise them about the Program.	Disability Services	Complete	Create awareness amongst staff about the TTY program to assist in handling enquiries.
Include articles in internal newsletters and publications to create awareness of the Telstra TTY Program.	Disability Services	Ongoing	Create and maintain awareness about Telstra's TTY Program.
7.2 Review the pricing principles applied to products and services provided to people with a disability, including those products provided by the Disability Tariff Concession Policy. (refer also Pricing Strategy- 9.3 page 29)	<ul style="list-style-type: none"> • Disability Services • CPE Group 	December 1997	Ensure that the price of products and services is reasonable having regard to all the circumstances.

Reference: Disability Compliance Manual

Strategy 7: Improve Accessibility to Telstra's Products and Services
- Payphone Service

Definition:

This strategy refers to the delivery of telecommunications services through payphones operated by Telstra. It excludes payphones (such as Bluephone) operated by other entities. Also excluded from this product definition are services that are not exclusively accessible from or with a payphone (for example directory assistance).

Initiatives Completed:

To assist people with a disability to access payphones, Telstra's Payphones Services have completed the following initiatives:

- removal of doors from cabinets, provision of half length booths, provision of modified payphones upon request (1989/90);
- provision of the following assistive devices -inductive coupling for hearing aids, touch dial pads with tactile orientation mark on 5 button, and tactile marking on Phonecard (1992);
- introduction of the Payphone Access Policy (PAP) and a program to increase the number of multi-access payphones (1993/4), and
- introduction of payphones with TTY facilities and the provision of a directory of modified payphones (1993/4).

Action	Responsibility	Time Frame	Outcome
7.3 Consult widely with disability and community groups to review and set new standards for the provision of payphone services to meet the needs of people with a disability.	Payphone Services	Commenced December 1995 and ongoing	Ensure that issues and concerns of customers are known, and that there is input to new standards from groups representing people with a disability.
7.4 Revise the PAP to reflect as far as is practicable, the standards determined above.	Payphone Services	October 1996	Improve the accessibility of Telstra payphones to people with a disability.
7.5 Implementation of procedures. Devise and document procedures to process and assess requests for modified payphones where standards are currently not being met	Payphone Services	November 1996	Individual requests to be assessed by the same method nationally.

Action	Responsibility	Time Frame	Outcome
Revise work instructions and technical specifications in accordance with the PAP and the above assessment process.	Payphone Services	December 1996	New equipment and enclosures ordered to meet new standards. New installations with existing equipment and enclosures to meet new standards, as far as is practical.
7.6 Plan to alter existing facilities. Audit existing payphone installations against new standards to determine extent of variation.	Payphone Services	Commenced October 1996	Identification of the extent to which standards are or are not being met.
Develop and implement a works plan to modify existing installations to meet standards.	Payphone Services	Plan complete March 1997. Implementation as per plan.	Telstra's payphone base to meet new standards and improve the accessibility of Telstra payphones to people with a disability.
7.7 Regularly review the PAP in consultation with the community.	Payphone Services	Review at least bi-annually.	Ensure standards and provision of service continue to meet needs.

Reference: Payphones Access Policy

Strategy 7: To improve Accessibility to Telstra's Products and Services
- Operator Assisted Services

Action	Responsibility	Time Frame	Outcome
<p>7.8 Ensure TTY accessibility to emergency 000 services. Continue to monitor TTY access to emergency 000 services via the Australian Communication Exchange (ACE) National Relay Service, and assist in working towards a better solution, if required.</p>	<ul style="list-style-type: none"> • Retail Products and Marketing • OAS 	<p>Agreement was reached in Jan 1996 between ACE and Telstra for TTY access to emergency 000 via the ACE Relay Service.</p>	<p>TTY access to emergency services.</p>
<p>7.9 Investigate any difficulties in accessing Telstra's Operator Assisted Services, in consultation with the community.</p>	<p>OAS</p>	<p>Ongoing</p>	<p>Improved access for people with a disability.</p>

Strategy 7: Improve Accessibility to Telstra's Products and Services
- Directory Services

Action	Responsibility	Time Frame	Outcome
<p>7.10 Establish a process to upgrade and improve the accuracy of the Telephone Typewriter Directory. Implement a data base clean-up by direct mailing all listings which have not been updated in the last two years.</p>	National Directory Services	September 1996	Improved accuracy of the TTY Directory.
Establish procedures to improve the level of service to clients of the Telephone Typewriter Directory	National Directory Services	June 1997	Ensure consistent level of service to TTY users.
Undertake TTY training for Telephone Typewriter Directory staff.	National Directory Services	June 1997	Ensure consistent level of service to TTY users.
Investigate access to directory services and operator assisted services for people with a communications disability.	<ul style="list-style-type: none"> • Disability Services • Telstra Consumer Consultative Council Research • OAS • Directory Services 	June 1997	Gain a better understanding of the needs of people with a speech impairment and a communications disability.

Strategy 7: Improve Accessibility to Telstra's Products and Services
- Mobile Communication Services

Action	Responsibility	Time Frame	Outcome
7.11 Monitor technological developments for TTY/Text interface equipment to identify opportunities for making TTYs more accessible to mobile communication products.	<ul style="list-style-type: none"> • Retail Products and Marketing • Disability Services 	October 1996 and ongoing	Improvement in the accessibility of TTYs to mobile communication products.
7.12 Continue to consult with industry bodies, disability groups, AUSTEL and the Government to resolve the issue of GSM interference to hearing aids.	Retail Products and Marketing	Ongoing	Improved accessibility to mobile telecommunications by hearing aid users.
Investigate the opportunity to widen the above consultative forum to discuss other disability/DDA compliance issues of importance to the mobile industry.	Retail Products and Marketing	December 1996	Improved accessibility to mobile telecommunications products for people with a disability. Ensure the needs of people with a disability are understood by suppliers on whom Telstra relies.

Strategy 7: Improve Accessibility to Telstra's Products and Services
- Other Products and Services (existing)

Action	Responsibility	Time Frame	Outcome
<p>7.13 Review other existing products and services, on an ongoing basis. This review may occur following:</p> <ul style="list-style-type: none"> • feedback from the Telstra Consumer Consultative forums; • customer complaints; • complaints to the HREOC; • input from Disability Impact Assessments, prepared as part of the Product Development Process, and/or • other feedback received. 	<ul style="list-style-type: none"> • Disability Services • Legal Directorate • RP&M 	Ongoing	Improved the accessibility of products for people with a disability.
<p>7.14 Ensure Telstra's Disability Policy is also adopted by Telstra's subsidiaries.</p>	<ul style="list-style-type: none"> • Disability Services • Legal Directorate 	March 1997	Improved accessibility of Telstra subsidiaries products and services.
<p>Inform joint-venture partners about Telstra's Disability Policy and associated activities.</p>	<ul style="list-style-type: none"> • Disability Services • Legal Directorate 	March 1997	Improved accessibility of Telstra's commercial partners' products and services.

Strategy 8: Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with the EEO policy.

Action	Responsibility	Time Frame	Outcome
<p>8.1 Review Telstra's employment policies and practices to ensure all are non-discriminatory. Include DDA awareness information in all relevant employment policies and procedures, where not currently addressed.</p>	Employee Relations	Ongoing to March 1997	Ensure Telstra's employment procedures comply with the DDA.
<p>Include a separate policy statement within the Corporate EEO statement specifically for Disability Discrimination.</p>	EEO	March 1997	Disability Discrimination is more prominently displayed in Telstra's EEO policy statement.
<p>Ensure information to employees on occupational health and safety, employment information, grievance handling procedures and EEO policies is made available in alternative formats, on request.</p>	<ul style="list-style-type: none"> • EEO • Individual Policy areas 	December 1996	Ensure equitable accessibility to information for all staff members.
<p>8.2 Facilitate further employment of people with a disability within Telstra. Continue the implementation of the <i>'Telstra Disability Employment Project Strategy'</i>.</p>	EEO	Ongoing	Increased employment opportunities for people with a disability.

Reference: Telstra's EEO Policy

Strategy 9: Incorporate DDA requirements into existing Telstra policies and programs

Action	Responsibility	Time Frame	Outcome
9.1 Ensure any information collected to verify a customer's disability, remains confidential in strict adherence with Telstra's Privacy Policy.	<ul style="list-style-type: none"> • Disability Services • Privacy Managers 	September 1996	Any details about a person's disability will remain confidential.
9.2 Review other policies as and when the need arises to ensure they are non-discriminatory.	<ul style="list-style-type: none"> • Policy areas • Legal Directorate 	Ongoing	Ensure Telstra's policies are non-discriminatory.
9.3 Review the pricing principles applied to products and services provided to people with a disability as required.	<ul style="list-style-type: none"> • Disability Services • Other areas as required. 	Ongoing	Ensure that the price of products and services is reasonable having regard to all the circumstances.

Section Six: Responsibilities and Resources

Corporate Responsibility

- The Disability Action Plan has been endorsed by Telstra's senior management.
- Telstra's Group Director, Regulatory and External Affairs shall have the corporate responsibility for the implementation of the Action Plan.

Line of Business Responsibility

- Each area of business within Telstra will recognise their responsibilities in the Action Plan and include appropriate funding in annual business plans and budgets.
- A responsible officer from each business unit will be nominated as the DDA compliance officer and will assist in coordinating and evaluating Action Plan initiatives within each business unit.

Day to Day Responsibility

- Day to day coordination and implementation of the Action Plan will be the ongoing responsibility of the Disability Services unit, Consumer Affairs, Regulatory and External Affairs.

Section Seven: Action Plan Communication Strategy

Internal Communications Plan

A comprehensive internal communications strategy will be developed and will include the following activities:

1. A copy of the Action Plan will be distributed to appropriate Telstra management including:
 - Senior Management
 - Relevant line managers
 - Supervisors in the Disability Enquiry Hotline Centres and Aged & Disability Centres
 - Staff directly involved in the implementation of the Action Plan

Additional copies of the Plan will be available from the Disability Services unit, Regulatory and External Affairs.

2. Internal communications material will be distributed to inform all staff of Telstra's Disability Action Plan.
3. Articles featuring the Disability Action Plan will be included periodically, in a variety of internal publications such as 'Our Future'.
4. A message about Telstra's disability programs, including the Disability Action Plan, will be prepared and distributed to all media officers for use in speeches where appropriate.

External Communications Plan

A comprehensive external communications strategy will be developed and will include the following activities:

1. Following formal approval by Telstra senior management, the Disability Action Plan will be lodged with the Human Rights and Equal Opportunity Commission.
2. An information pack containing cover letter and a copy of the Plan will be distributed to relevant external organisations including:
 - Equal Opportunity Commissioner or equivalent, in each state;
 - Telecommunications Industry Ombudsman;
 - Department of Health and Family Services;
 - Department of Communications and the Arts and other relevant government departments;
 - AUSTEL, and
 - Key disability and community groups.
3. The Disability Action Plan will be launched following lodgement with HREOC.
4. A marketing strategy will be developed to provide information to the public about Telstra's specific initiatives in improving service to people with a disability, as these initiatives are launched.
5. Information about Telstra's Disability Action Plan will be included, where appropriate, in Telstra's National Communications Team talks and in Telstra's Disability Action Plan will be included in the next edition of the '*Guide to Using Telstra's Telephone Products and Services*'.
6. Articles featuring the Disability Action Plan and Telstra's disability programs will be prepared for inclusion in relevant disability media.

Section Eight: Monitoring and Evaluation

Complaints Management Process

Telstra has a comprehensive complaints management process in place and any complaints about failure to comply with the DDA or the Action Plan will be made through these usual channels. Telstra's aim is to resolve all problems or complaints at the local level quickly and effectively. If unsatisfied with the initial outcome of the complaint, or if a customer feels the complaint did not receive a fair hearing, the complaint will be escalated to the supervisor or manager. The supervisor or manager will review the complaint and the way it was handled. Telstra has a formal process in place to ensure that the complaint is addressed at the highest level necessary, to guarantee an appropriate response for each complaint. All complaints referred to Telstra by the Human Rights and Equal Opportunity Commission will be directed to Telstra's Disability Services unit for resolution.

Any concerns should be directed to:

Disability Enquiry Hotline	FREECALL™ 1800 068 424	(Voice)
National TTY Enquiry Line	FREECALL 1800 808 981	(TTY)

Complaints may also be forwarded in writing, by facsimile, or by TTY.

Write to:	Customer Referral Centre	Facsimile:	(03) 9634 0277
	Telstra Corporation Ltd	TTY:	FREECALL 1800 033 433
	Locked Bag 4160		
	MELBOURNE VIC 8100		

Any enquiries or suggestions about Telstra's Disability Action Plan should be directed to:

Telstra Disability Action Plan	Facsimile:	(03) 9632 3235
Locked Bag 4960	TTY:	FREECALL 1800 671 880
Melbourne 8100		

Monitoring

The Action Plan is a dynamic document and within the first year of implementation its progress will be reviewed each quarter by the internal DDA Compliance Group. In subsequent years the Plan will be reviewed twice a year by this group. To assist in this ongoing review, information will be collected on the following activities:

- the number of and type of information distributed in alternative formats;
- the number of TTY enquiries received by Telstra's TTY Enquiry Lines;
- the number of written enquiries about the Action Plan;
- data gathered from the Complaints Management Process (via CICERO, the SMRT) including the number of complaints referred to the Disability Services unit for advice;
- any customer complaints referred to the Human Rights and Equal Opportunity Commission;
- the customer service 'satisfaction levels' for customers of Telstra's disability products and services, as provided in regular research reports eg. TELCATS reports;
- the percentage of payphones meeting the Payphone Access Policy requirements;
- the percentage of buildings which meet the Access Action Plan requirements;
- compliance with the DDA requirements within the Product Development Process; and
- the regular reports from Telstra's TTY Program.

The above information will be provided to the Disability Services unit and will be used to evaluate the success of Action Plan strategies.

Evaluation

- the Disability Services unit will oversee the day to day implementation of the Disability Action Plan and will coordinate the quarterly meetings of the DDA Compliance Group;
- the DDA Compliance Group will meet each quarter to review the implementation process and report to Telstra's Group Director, Regulatory and External Affairs annually, on the achievement of targets and the progress towards removing barriers;
- the Disability Services unit will review the effectiveness of the Action Plan each year and consider its effectiveness;
- the Disability Services unit will report annually to the Telstra Consumer Consultative Council on the progress of the Action Plan implementation;

Evaluation continued:

- the Disability Services unit will be responsible for overseeing the assessment of customer complaints and new product development issues and will report regularly to both the DDA Compliance Group and senior management on the status of issues being assessed;
- employees involved in training will participate in a training evaluation survey to ascertain if the objectives of the training were achieved or if further training is required;
- management performance appraisals and consequential salary determinations for all relevant Telstra managers will include the acceptance and performance under the tenets of Telstra's Disability Action Plan;
- each annual report commencing 1996/7 will include a summary of progress towards the Disability Action Plan implementation,
- audits will be conducted to assess the awareness of staff and adherence to Telstra's disability compliance program; and
- provision will be made for an assessment, to include some external input, of the implementation process to take place after two years, which will include a review of all strategies.

Section 9: Future Direction

As outlined above, the monitoring and evaluation of the Disability Action Plan will occur on an ongoing basis and amendments may be made to the Plan. The Action Plan process will be cyclical with feedback from the process used to review strategies, actions and timelines as necessary. Consultation via the Telstra Consumer Consultative Council and relevant sub-committees, will be an ongoing feature of the Action Plan implementation.

Other than via this regular review of operations, the Action Plan may be amended to reflect changes in external factors such as technological advancements, changes to the regulatory or legislative environment in which Telstra operates and changes in community expectations. However it is proposed that a formal, comprehensive review of the Disability Action Plan should take place two years after its launch, and consideration will be given at this time, as to how best to mainstream the Action Plan initiatives into the normal business planning of all business units.

Appendix One: Key Deliverables and Milestones

30 June 1996

- Successfully implemented *"Telstra's TTY Program"*
- Accessibility criteria included within Telstra's *"Accommodation Guidelines"*
- Ensured all Telstra's television advertisements include captions (supertext)
- Ensured TTY accessibility to 000 Emergency Services via the ACE National Relay Service

31 December 1996

- Reviewed and revised the *"Payphones Access Policy"* after consultation with the community
- Developed a Corporate Disability Policy for inclusion in Telstra's Company Policy Manual
- Developed a Corporate Access Policy for all Telstra buildings
- Included Telstra's National TTY Enquiry line number in all key corporate publications
- Ensured all new products and services are assessed for potential use by persons with a disability as part of the Product Development Process
- Developed and commenced the implementation of a "Works Plan" to modify existing pay phone installations to meet the standards
- Established processes to improve the accuracy of the Telephone Typewriter Directory

30 June 1997

- Developed a brochure providing information on Telstra's services for people with a disability
- Developed key publications and communications material in alternative formats for customers
- Developed and distributed a Corporate Compliance Manual
- Promulgated the principles of the Corporate Disability Policy throughout the corporation via appropriate staff communications
- Developed and commenced the implementation of a comprehensive "Works Program" for upgrading Telstra's building portfolio to improve accessibility
- Communicated Telstra's access policies and practices to all relevant staff working in Property Services
- Completed an audit of existing payphone facilities against the *"Payphones Access Policy"*
- Developed a works plan to modify existing installations to meet the standards in the *"Payphones Access Policy"*

31 December 1997

- Included disability awareness and DDA compliance issues in relevant training modules
- Successfully implemented a Staff Awareness program focusing on compliance with the DDA and general disability awareness
- Undertaken at least one major research project to monitor the needs of people with a disability
- Completed a review of the pricing principles applied to products and services provided to people with a disability

Appendix Two: Disability Action Plan - Key Performance Measurement

STRATEGIES	KEY PERFORMANCE INDICATORS
1. Development of a Disability Policy and staff guidelines	<ul style="list-style-type: none"> • Issue Corporate Disability Policy • Issue Disability Compliance Manual • Policies and manuals will be reviewed and updated every 2/3 years to ensure content remains relevant
2. Develop a Disability Awareness Program	<ul style="list-style-type: none"> • All staff receive disability awareness materials and information • Articles published in internal communications publications periodically • Training evaluation surveys • Review of staff training needs to include disability awareness • Conducted an audit of staff awareness as part of the Disability Compliance Program
3. Ensure ongoing community consultation and consideration of developments external to Telstra	<ul style="list-style-type: none"> • Disability Services Consultative Committee to report to the Telstra Consumer Consultative Committee annually on the progress of consultation on disability issues • Progress of market research projects included in annual Action Plan reports
4. Improve accessibility to Telstra's building and facilities	<ul style="list-style-type: none"> • All new buildings leased and owned to be accessible • Access Advisory Committee to annually review progress of Access Plan • Progress of Access Plan implementation included in quarterly Action Plan reports • Annual review of policies and procedures to ensure relevancy
5. Improve accessibility to information for people with a disability	<ul style="list-style-type: none"> • Information material detailing Telstra's services for people with a disability produced and readily available • Information needs monitored and included in quarterly reports
6. Improve accessibility to Telstra's new products and services	<ul style="list-style-type: none"> • Disability Compliance Report completed for all new products

STRATEGIES	KEY PERFORMANCE INDICATORS
7. Improve accessibility to Telstra's existing products and services	<ul style="list-style-type: none"> • Disability Services unit to report regularly to management on the investigation of customer complaints relating to existing products • Timely resolution of all customer complaints regarding products and services
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with the EEO policy	<ul style="list-style-type: none"> • Number of people with a disability employed by Telstra is in accordance with targets set by Telstra's Disability Employment Strategy
9. Incorporate DDA requirements into existing Telstra policies and programs	<ul style="list-style-type: none"> • Policies reviewed and updated, where necessary, to ensure DDA compliance

Glossary of Terms

ACE	Australian Communication Exchange Ltd -manages the TTY National Relay Service and equipment program
AUSTEL	Australian Telecommunications Regulatory Authority
B&G	Telstra's Business and Government group
CICERO	Telstra's national Complaints Management Process support system
CPE	Customer Premises Equipment
DDA	Disability Discrimination Act (1992)
DSCC	Disability Services Consultative Committee, a sub-committee of the Telstra Consumer Consultative Council - made up of representatives from a number of peak consumer and disability groups
DTCP	Disability Tariff Concession Policy
FREECALL™	Calls to FREECALL numbers are free to the caller from most phones except mobile phones*
GSM	Global System for Mobile Communications, European (and Australian) digital standard for mobile phones
HREOC	Human Rights and Equal Opportunity Commission - statutory body responsible for matters under the Disability Discrimination Act 1992
NRS	National Relay Service allowing TTY to Voice (and vice versa) communication through a relay operator
NTG	Telstra's Network Technology Group
OAS	Telstra's Operator Assisted Services unit
PAP	Payphones Access Policy
RP&M	Telstra's Retail Products and Marketing Business Unit
SMRT	Senior Management Review Team
TCCC	Telstra Consumer Consultative Council
TELCATS	Telstra's Customers' Attitudes To Service
TIO	Telecommunications Industry Ombudsman
TTY	Teletypewriter - keyboard device to allow use of telephones by people with a hearing or speech impairment

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* A free call unless made from a mobile phone, which will be charged at the applicable mobile rate

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