

**REPORT TO THE
HUMAN RIGHTS AND EQUAL OPPORTUNITY
COMMISSION**

**TELSTRA CORPORATION'S
DISABILITY ACTION PLAN 1996 - 1998**

2 December 1999

Ms Susan Halliday
Acting Disability Discrimination Commissioner
Human Rights and Equal Opportunity Commission
Piccadilly Tower
Level 8, 133 Castlereagh Street
SYDNEY NSW 2000

Dear Ms Halliday,

It is with pleasure that I submit this Report on the implementation of Telstra's first Disability Action Plan 1996 - 1998. Telstra was proud to be the first major Corporation to develop and lodge a Disability Action Plan with the Commission.

Over the past three years, the telecommunications industry has experienced extensive and rapid growth. The industry has expanded from a duopoly to one with multiple carriers and carriage service providers. There has been an explosion of new products and services onto the market at the same time as a substantial decrease in the costs to the public of basic telephone services. The way we do business and conduct our daily lives has changed with the increase in the use of the Internet, e-mail and other data services, and the increased mobility afforded by data transfer over mobile telephony.

I am pleased to report that the vast majority of our commitments have been either fully or partially implemented and the efforts of the many staff in Telstra who worked to achieve this significant outcome are appreciated. There is still much to be done. Telstra is currently finalising its new Disability Action Plan 1999 - 2001, which I look forward to submitting to you in the near future. Through the new Disability Action Plan, Telstra will continue to work towards improved accessibility to products and services for our customers.

It is with regret that I acknowledge the death of the first Disability Discrimination Commissioner, Ms Elizabeth Hastings in October 1998. Ms Hastings achieved much in establishing the Disability Discrimination Unit and the many projects in which she was involved during her time as the Disability Discrimination Commissioner. Ms Hastings demonstrated her willingness to work with government, business,

community organisations and individuals to achieve positive outcomes for people with a disability in Australia.

I would like to acknowledge Ms Hastings for the guidance she provided to my staff on a range of issues. Her efforts set the standard for a cooperative working relationship between Telstra and the Commission, which remains in place today.

Yours sincerely

Graeme B Ward

**Group Managing Director
Public Affairs and Corporate Marketing
Telstra Corporation Ltd**

TABLE OF CONTENTS

Executive Summary

1. Introduction and Objectives of the Report

2. Changes to the Telecommunications Industry and its Regulation

Introduction of the Telecommunications Act 1997

Increased consultation with industry and consumer groups

3. Development and Evolution of Telstra's Disability Action Plan

4. Governance and Monitoring of Telstra's Disability Action Plan

5. Review of Telstra's Disability Action Plan

5.1 Process

5.1.1 PwC Review

5.1.2 Consumer Feedback

5.2 Results of the Nine Strategies

Strategy 1: Develop a Telstra Corporate Disability Policy and DDA Compliance Program

Strategy 2: Develop a Disability Awareness Program for all staff

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

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

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

Strategy 6: Improve accessibility to Telstra's new products and services

Strategy 7: Improve access to Telstra's existing Products and Services

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

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

5.2.1 Consumer Feedback

6. HREOC Complaints

7. Future Direction

Executive Summary

Telstra was the first major corporate to develop and lodge a Disability Action Plan with the Human Rights and Equal Opportunity Commission. Telstra lodged its Action Plan with the Commission on 3 December 1996, International Day of Disabled People.

The Disability Action Plan submitted in 1996 consisted of a mission statement and nine strategies. These strategies were:

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

The objective of this Report is to provide the Human Rights and Equal Opportunity Commission (HREOC) with the status of the implementation of Telstra's Disability Action Plan.

There have been many changes to the telecommunications industry since Telstra first submitted its Disability Action Plan in 1996. These include:

- Opening of the telecommunications industry to full competition;
- Changes to legislation (including the expansion of the Universal Service Obligation);

- Promotion of industry self regulation as a key plank of the telecommunications regime;
- Increased number of products and services;
- Decrease in prices for long distance calls;
- Increased consumer consultation;
- Increased consumer expectations; and
- Increased community awareness of the DDA.

While the format of Telstra's consultation with representatives of disability consumer organisations has changed, Telstra has continued to consult widely with consumer and industry groups.

Telstra is proud of its commitment to people with disabilities whether they be customers or employees. Telstra remains committed to increasing the number of employees with disabilities.

As detailed in the Disability Action Plan, Telstra planned to perform a review of the initiatives included in the Disability Action Plan and prepare a report to the Human Rights and Equal Opportunity Commission regarding the status of the implementation of the nine strategies outlined in the Plan.

PricewaterhouseCoopers ("PwC") was appointed to perform this review. PwC reviewed the status of each action point detailed in the Disability Action Plan. The results of the *PricewaterhouseCoopers* work were based on discussions held with Telstra employees along with sighting of primary evidence to indicate action against each item in the Disability Action Plan. The PwC report is dated 4 February 1999.

The findings for each strategy as at 4 February 1999 are summarised in the table below. The table indicates the number of action points completed, in progress or yet to be actioned for each strategy. It should be noted that for items requiring ongoing action, if the action has been performed to date, the action has been marked as completed.

Strategy	Complete	In Progress	Not actioned	Total
1. Develop a Telstra Corporate Disability Policy and DDA Compliance Program.	1	1	0	2
2. Develop a Disability Awareness Program for all staff	1	4	1	6
3. Ensure ongoing consultation and consideration of developments external to Telstra	4	0	0	4
4. Improve accessibility to Telstra's buildings and facilities	5	4	1	10
5. Improve accessibility to information for people with a disability	12	4	2	18
6. Improve accessibility to Telstra's new products and services	3	0	1	4
7. Improve access to Telstra's existing Products and Services, including:				
• Customer Premises Equipment (CPE)	5	1		6
• Payphone Services	3	4		7
• Operator Assisted Services	1	1		2
• Directory Services	3	1		4
• Mobile Communication Services	3			3
• Other products and services	1		2	3
Total	16	7	2	25
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with EEO policy	4	0	0	4
9. Incorporate DDA requirements into existing Telstra policies and programs	3	0	0	3
Total	49	20	7	76
Total %	65%	26%	9%	100%

PricewaterhouseCoopers did not undertake a review of the effectiveness of the Disability Action Plan. Consumer feedback was sought to gain a qualitative perspective on the effectiveness of Telstra's Disability Action Plan. A Questionnaire was sent to members of Telstra's Disability Consumer Forum in March 1999 seeking their feedback on their perceptions of Telstra's progress against the Disability Action Plan (see section 5.2.1). Not all consumers chose to provide feedback, and feedback was not received for all items. Consumers were most satisfied with Telstra's consumer consultation

and the research projects either funded or initiated by Telstra. Of most concern to consumers was the lack of direct access to Emergency 000 for TTY users.

Telstra was notified by the Human Rights and Equal Opportunity Commission of five Human Rights and Equal Opportunity Commission complaints during the period 1996 – 1998. Two of the complaints have been resolved, one has become the subject of a public inquiry and two, which were joined, are still being conciliated.

Telstra is constantly striving to improve its products and services. We are currently in the process of preparing our next three-year Disability Action Plan and this will incorporate the key areas of:

- improved accessibility to new and existing products and services, information, and buildings and facilities,
- regular complaints analysis,
- improved staff awareness,
- internal governance/compliance process,
- ongoing community consultation, and
- ongoing EEO strategies.

The next Disability Action Plan will also incorporate some of the items not actioned from the first plan.

As detailed in our first plan, consideration is now being given as how best to mainstream the Disability Action Plan initiatives into the normal business planning and ongoing monitoring process of all business units. This will ensure the initiatives are addressed on a regular basis by the business units thus improving the products and services offered to people with disabilities.

1. Introduction and Objective of the Report

The *Disability Discrimination Act 1992* (“DDA”) came into effect in March 1993, making it unlawful to discriminate against people on the basis that they have, or may have, a disability. The DDA makes provision in section 60 for a service provider, such as Telstra, to prepare and implement an Action Plan, which may be lodged with the Human Rights and Equal Opportunity Commission (“HREOC”). Section 61 states that the Action Plan must include provisions relating to:

- the devising of policies and programs to achieve the objects of the DDA;
- the communication of these policies and programs to staff;
- the review of practices within the company with a view to identifying any discriminatory practices;
- the setting of goals and targets against which the success of the plan in achieving the objects of the DDA may be assessed;
- the means of evaluating the policies and programs; and
- the appointment of staff to implement the above provisions.

Telstra was the first major Corporation to develop a Disability Action Plan and lodge it with HREOC, which it did on 3 December 1996, *International Day of Disabled People*.

Telstra’s first Disability Action Plan consisted of a mission statement and nine strategies. These strategies were:

1. Develop a Telstra Corporate Disability Policy and DDA Compliance Program.
2. Develop a Disability Awareness Program for all staff.
3. Ensure ongoing consultation and consideration of developments external to Telstra.
4. Improve accessibility to Telstra’s buildings and facilities.
5. Improve accessibility to information for people with a disability.

6. Improve accessibility to Telstra's new products and services.
7. Improve access to Telstra's existing Products and Services.
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with EEO policy.
9. Incorporate DDA requirements into existing Telstra policies and programs.

This report summarises the progress Telstra has made in relation to the nine strategies detailed in the Disability Action Plan. The report consists of seven sections:

- *Section 1:* contains the introduction and objective of the report
- *Section 2:* outlines changes to the telecommunication industry and its regulation
- *Section 3:* outlines the development and evolution of Telstra's Disability Action Plan
- *Section 4:* outlines the governance and monitoring of the Disability Action Plan
- *Section 5:* details the status of the nine strategies outlined in the Disability Action Plan including the PricewaterhouseCoopers (PwC) review and consumer feedback
- *Section 6:* outlines the complaints lodged against Telstra in the Human Rights and Equal Opportunity Commission
- *Section 7:* provides our conclusion and future direction for Telstra's next three year Disability Action Plan.

This report demonstrates Telstra's commitment to people with disabilities, both in terms of its internal policies and processes and external product and service development. Telstra aims to build on the success of the first three-year plan and continue to improve its service to people with disabilities.

2. Changes in the Telecommunications Industry and its Regulation

Over the past three years, the telecommunications industry has undergone extensive and rapid change. Full and open competition came into effect on July 1, 1997 with the introduction of the *Telecommunications Act 1997*. There has been an increase in the number of telecommunications carriers to 25 at the end of 1998, and many more carriage service providers.

In addition we have seen the introduction of many new products and services, most notably a huge increase in Internet and data services and mobile phones. This has had the effect of providing customers with a greater choice of services, and providing opportunities for access that previously did not exist.

The pricing of long distance calls has decreased significantly with a range of special offers available from the various carriers and carriage service providers.

The Telecommunications Act 1997

The most significant change to legislation impacting on people with a disability over the past three years was the expansion of the Universal Service Obligation ("USO") in 1997 to include the supply of customer equipment upon request to enable people with a disability to access the standard telephone service.

Telstra is required to supply equipment to people with a disability to meet its obligations under the *Disability Discrimination Act 1992* ("the DDA") and the Universal Service Obligation ("USO") in the *Telecommunications Act 1997*. The USO is now contained in the *Telecommunications (Consumer Protection and Service Standards) Act 1999*. As the nominated national Universal Service Provider, Telstra is obliged to ensure that standard telephone services, payphones and prescribed carriage services (of which there are

currently none) are reasonably accessible to all Australians, wherever they reside or carry on business. For the purposes of the USO, the supply of the standard telephone service includes the supply of customer equipment (including equivalent disability equipment) upon request. The telecommunications legislation provides a process for telecommunications carriers to share the cost of funding the USO, although it should be noted that this does not currently include the costs to Telstra of providing disability equipment.

As the national Universal Service Provider, Telstra will, at the request of a person with a disability and in conjunction with the provision of the standard telephone service, supply disability equipment by way of hire to enable a person with a disability to access the service at an equivalent rental cost.

The *Telecommunications (Equipment for the Disabled) Regulations 1998* ("the Regulations") which came into force on 25 June 1998 specify the kind of customer equipment that is to be supplied to a person with a disability for use in connection with the standard telephone service. The Regulations specify the kind of customer equipment by way of functionality and include, by way of example, the following products: TTY, modem, telebraille, the Touchfone 400, the Touchfone 400 volume control, the Touchfone 200 voice aid, the Access 35 handsfree telephone or the Touchfone 200 Executive, an extension ringer or general purpose alarm, a visual signal alert, a double adaptor, a Holdaphone, and a cochlear implant telephone adapting device (TLP-102T or TRP - 100T).

Telstra supplies these products under the Telstra Disability Equipment Program (except for the telebraille which is no longer being manufactured and the cochlear implant telephone adapting device which was launched on 21 September, 1999).

The range of disability equipment provided under Telstra's Disability Equipment Program has varied over time. In September 1998, Telstra's

Disability Equipment Program was expanded to provide customer equipment that was formerly provided under the Telstra TTY Program and the Federal Government's National Relay Service - Telecommunications Equipment Access ("NRS-TEA") Program. Under these two programs, people who are deaf, have a speech or communication impairment or who are deaf and blind were provided with a voucher towards the purchase of a teletypewriter ("TTY"), modem or telebraille. Government funding for the NRS-TEA program ceased on 30 June 1998.

It should be noted that the provision of equipment through the Disability Equipment Program does not preclude a customer from obtaining long distance services from another carrier or carriage service provider.

Telstra's Universal Service Plan, approved by the Minister for Communications, Information Technology and the Arts in May 1998, sets out information about the supply of the standard telephone service to people with disabilities. This information as currently drafted, refers to the Telstra TTY Program and the Telstra Disability Equipment Program. Telstra submitted a revised draft of the disability section of its Universal Service Plan to the Australian Communications Authority ("ACA") as part of the ACA's review of the Plan. The revision was required because of the closure of the NRS-TEA Program and the expansion of the Telstra Disability Equipment Program, in keeping with the changed arrangements under the Universal Service regime.

The Telecommunications Act 1997 (and now the Telecommunications (Consumer Protection and Service Standards) Act 1999) provides for a National Relay Service to provide people who are deaf, or have a hearing and/or speech impairment, with access to a standard telephone service on terms and in circumstances that are comparable to those on which other Australians have access to a standard telephone service. The National Relay service is not part of the USO, although like the USO regime, the legislation requires telecommunications carriers to contribute to the cost of providing the NRS. The National Relay Service operates 24 hours, 365 days per year and

is provided under contract to the Commonwealth Government by Australian Communication Exchange Ltd.

In a further change under the Telecommunications Act 1997, the Australian Communications Authority (ACA) can make a technical standard for customer equipment that is used in connection with the standard telephone service which is not designed for use by people with disabilities (ie. an ordinary telephone) that would, via the inclusion of mandatory features, give persons with a disability, greater access to this equipment. The ACIF has drafted a disability standard (on behalf of the ACA). Telstra is working closely with ACIF to develop the standard.

Increased consultation with industry and consumer groups

Australian Communications Industry Forum (ACIF)

The passage of the *Telecommunications Act 1997* gave rise, from 1 July 1997, to major changes to the regulation of the Australian telecommunications industry, including the transfer of responsibility for significant standardisation activities from the regulator to the industry . Whilst there are still legislative requirements, obligations and safeguard provisions with which industry participants must comply, it was intended that industry itself initiate and drive regulation to the greatest extent possible.

In 1997, members of the telecommunications industry established the Australian Communications Industry Forum (“ACIF”) as the industry body with the responsibility of developing industry codes under the *Telecommunications Act 1997*. ACIF also has a role in developing technical standards to be adopted by the ACA which relate to customer equipment and customer cabling, the interconnection of facilities and disability standards.

Industry provides ACIF with the experts to develop technical standards and industry codes.

On 25 February 1999, after consultation with disability sector associations, ACIF established a Disability Advisory Body (DAB) to provide focussed interaction with, including, as relevant, representation in the technical standards and industry codes development process, of persons with disabilities. Membership of the DAB comprises representatives of associations covering persons with disabilities including vision, hearing, speech, physical, and intellectual disabilities.

The DAB responsibility covers:

- examination of proposals for the development of industry codes and technical standards that have intrinsic disability implications;
- examination of drafts, including public comment drafts, of industry codes and technical standards for implications for persons with disabilities, and in both cases, providing appropriate advice within the ACIF Executive and the industry codes and technical standards development structure; and
- facilitating the availability of representatives to advise, or participate in Working Committees.

In essence, persons with disabilities have been given special exposure to the work of, and representation within, the Standards and Codes development process in ACIF.

In its relative short history, the DAB has shown it can contribute significantly to identifying the need, in Consumer Codes, for adequate access facilities / processes to service providers including special inquiry lines or operators, TTY access, provision of information in alternative formats, and how a complaint may be lodged.

(Telstra would like to acknowledge Mr Rex Christensen of the ACIF for compiling this section of the Report for Telstra.)

Funding of Consumer Representation

There is provision in section 593 of the *Telecommunications Act 1997*, for the Commonwealth to fund consumer representation and research in relation to telecommunications. The funding is provided for consumer representation by a range of consumer organisations, including organisations that represent people with a disability.

Conclusion

Consumers have expressed concern that in a telecommunications industry that is open to full competition, there may be fewer protections available to them and that their needs will not be addressed. Legislation such as the *Telecommunications Act 1997* and *Disability Discrimination Act 1992* coupled with industry self-regulation and increased consumer consultation will ensure that consumers needs will continue to be accommodated. Competition has undoubtedly resulted in greater choice of product and service offerings and lower prices for basic services for all Australians, including people with a disability.

3. Development and Evolution of Telstra's Disability Action Plan

The *Disability Discrimination Act 1992* allows for an organisation to develop and lodge a Disability Action Plan with the Human Rights and Equal Opportunity Commission. The decision by Telstra came about as a result of the process of resolving the *Scott & Ors v Telstra* case. This helped Telstra to gain a better understanding of the workings of the *Disability Discrimination Act 1992* and its implications for Telstra.

Telstra conducted an initial review with the aim of gaining an understanding of what process would need to be followed to develop a Disability Action Plan, what issues would need to be addressed within an Action Plan, how an Action Plan should be structured and from what sources input would need to be obtained. As outlined in section 4 of the Disability Action Plan, the aims of the review were also 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.

Prior to the review, Telstra had an informal internal working group comprised of representatives of key areas of the organisation that were dealing with disability issues and were already engaged in active consumer consultation. This group formed the basis of the DDA Compliance Working Group. This group advised the Disability Services Unit as to which policies, products and services were a priority for action, and assisted the Disability Services Unit to conduct the internal part of the review.

At the same time, consumer representatives on Telstra's Disability Services Consumer Committee (DSCC) were invited to attend a workshop to scope out what areas of the business, or issues Telstra needed to address in its Disability Action Plan. A follow up forum was convened to agree priorities with consumers – ie what commitments should be short, medium and long term in the Plan.

Telstra also sought specialist advice from experts in the disability discrimination field on a range of aspects of the process of development of the Action Plan, and the content of the Plan itself. Information was collated and a draft developed. Consultants were engaged to conduct audits of Telstra payphones and buildings, in particular. A draft of the Plan was circulated internally and externally to consumers and key advisers, for comment. The final version of the Plan was launched at an event on International Day of People with Disabilities, 3 December 1996, attended by Ms Elizabeth Hastings, senior Telstra managers and consumer representatives. Telstra officially lodged its Disability Action Plan with the Human Rights and Equal Opportunity Commission on that day.

4. Governance and Monitoring of the Disability Action Plan

The development and ongoing monitoring of the Disability Action Plan was overseen by Telstra's Disability Services Unit.

A two-tiered governance process was established to monitor the Disability Action Plan. This involved a Senior Management Compliance Group, chaired by Graeme Ward (then Group Director, Regulatory & External Affairs) which was to meet every six months. Representatives on the Senior Management Compliance group were appointed by each of the Business Unit heads. Their role is to provide strategic direction and advice about key aspects of Telstra's compliance with the Disability Discrimination Act.

The Senior Management Compliance Group was supported by a DDA Compliance Working Group comprised of representatives from each of the Business Units and key business areas within Telstra. The DDA Compliance Working Group meetings were chaired by the National Manager, Consumer Relations, and were to meet quarterly. With the majority of DDA impacts being on Telstra's products and services for Consumer customers (being residential and small business customers), representation from a number of business areas within Telstra's Commercial and Consumer Business Unit was required. The group provided regular reports on the progress of their action points in the Plan. The group also provided practical guidance and advice to Telstra management on what were the priority areas requiring action.

Regular contact was maintained between business units, industry and consumer groups. Telstra relied on research, consumer consultation (as described under section 5, strategy 3) and the Disability Services Unit to ensure the initiatives contained in the Disability Action Plan were achieved where possible.

Ongoing consultation and the move to more sector specific discussions on new product developments or key areas of concern, has assisted Telstra to achieve the best outcomes possible for people with disabilities.

5. Review of Telstra's Disability Action Plan

Telstra's first Disability Action Plan covered the three-year period from 1996 to 1998. When the Plan was launched on December 3, 1996, work was well under way to implement many of the actions outlined in the Plan.

Telstra indicated in Section 9 of the Plan that it would conduct a formal, comprehensive review of its Disability Action Plan two years after its launch.

That review commenced in December 1998 and forms the basis of this report.

5.1 Process

The review of Telstra's first Disability Action Plan has been a three-stage process. **PricewaterhouseCoopers ("PwC")** was engaged to conduct an independent review of Telstra's Plan which included a testing methodology. Further, consumer feedback was sought through disability representatives on Telstra's Disability Consumer Forum.

5.1.1 PwC Review

On engagement by Telstra, PwC's first task was to develop a Testing Plan, by which the status of each of the actions outlined in the Disability Action Plan could be independently evaluated. While Appendix One of Telstra's Disability Action Plan identifies a range of Key Deliverables and Milestones, and Appendix Two, Key Performance Measurements, it was agreed that the basis on which Telstra reports its success in implementing the Plan, should be the status of the individual actions outlined in each of the nine strategies.

The Testing Plan developed by PwC formed the structure for the review. The results of the *PricewaterhouseCoopers* work were based on discussions held

with Telstra employees along with the sighting of primary evidence to indicate action against each item in the Disability Action Plan.

If an action has been fully implemented it is shown as '**Complete**'. Where an action has been commenced but not fully implemented, it is shown as '**In Progress**', and where implementation of an action has not commenced (irrespective of the reason), it is shown as '**Not Actioned**'.

It should be noted that for items requiring ongoing action, if the action has been performed to date, the action has been marked as '**Complete**'.

The findings for each strategy are summarised in the table in the Results section in 5.2 below.

PricewaterhouseCoopers review was a quantitative review only, and did not attempt to evaluate the effectiveness of the actions taken by Telstra to implement its Disability Action Plan strategies.

5.1.2 Consumer Feedback

Nine organisations represented on Telstra's Disability Consumer Forum were invited to complete a questionnaire which identified those actions where the organisations could be expected to have knowledge of the actions taken by Telstra to implement that strategy. Some items they would not have knowledge of because they related to internal policies or processes. They were asked to rate Telstra's performance on qualitative grounds as 'Satisfied', 'Partly Satisfied', or 'Not Satisfied'.

In all 19 actions under four key strategies were identified as appropriate for consumer feedback:

- Strategy 3: Ensure ongoing community consultation
- Strategy 4: Improve accessibility to buildings and facilities
- Strategy 5: Improve accessibility to information
- Strategy 7: Improve accessibility to existing products and services, including CPE, Payphones, OAS, Directory Services, Mobiles, and other products and services

Not all organisations that were invited to provide feedback did so, and feedback was not received on each action. Feedback is summarised in section 5.2.1.

5.2 Results of the Nine Strategies

This section reports on implementation of the nine strategies. The report outlines the aims of the strategy, the PwC audit findings in percentage terms and then a discussion of the actions taken by Telstra to implement the actions under each strategy. The results of the PwC independent review as at 4 February 1999 are detailed in the following table:

Strategy	Complete	In Progress	Not actioned	Total
1. Develop a Telstra Corporate Disability Policy and DDA Compliance Program.	1	1	0	2
2. Develop a Disability Awareness Program for all staff	1	4	1	6
3. Ensure ongoing consultation and consideration of developments external to Telstra	4	0	0	4
4. Improve accessibility to Telstra's buildings and facilities	5	4	1	10
5. Improve accessibility to information for people with a disability	12	4	2	18
6. Improve accessibility to Telstra's new products and services	3	0	1	4
7. Improve access to Telstra's existing Products and Services, including:				
• Customer Premises Equipment (CPE)	5	1		6
• Payphone Services	3	4		7
• Operator Assisted Services	1	1		2
• Directory Services	3	1		4
• Mobile Communication Services	3			3
• Other products and services	1		2	3
Total	16	7	2	25
8. Maintain Telstra's commitment to the elimination of discrimination in the workplace in accordance with EEO policy	4	0	0	4
9. Incorporate DDA requirements into existing Telstra policies and programs	3	0	0	3
Total	49	20	7	76
Total %	65%	26%	9%	100%

Strategy 1: Develop a Telstra Corporate Disability Policy and DDA Compliance Program.

The aims of this strategy were to obtain senior level understanding and endorsement of Telstra's DDA compliance program and to provide a framework for DDA compliance throughout the Corporation.

***PricewaterhouseCoopers* review found that 100% of actions had been either completed or were in progress for this strategy.**

1.1 Endorsement of Corporate Disability Policy for inclusion in Telstra's Corporate Policy Manual.

Prior to the development of Telstra's Disability Action Plan, a Corporate Disability Policy was drafted. The Corporate Disability Policy was designed to increase senior level understanding and endorsement of Telstra's DDA Compliance Program and set the broad policy direction that Telstra management wanted the company to follow. In essence it states that people with a disability have the same rights as the rest of the community and to the best of its ability Telstra will aim to make its products and services accessible to all its customers.

Initially, the Corporate Policy was provided in hard copy as part of Telstra's Corporate Policy manual, which had a limited distribution within the company to managers and made available to their staff. More recently it, along with all company policies, is now located on Telstra's internal Intranet site and is accessible to all staff either directly or through their supervisor.

The Corporate Disability Policy was formally accepted and signed by Mr Graeme Ward, Group Director, Regulatory and External Affairs, and Telstra Chief Executive Officer, Mr Frank Blount on 28 November 1996.

1.2 Develop a Disability Compliance Manual to support the Disability Policy.

The intention in developing this strategy was that all relevant management and staff (particularly those in customer facing areas) would have a written reference manual which provided a framework for DDA compliance throughout the corporation.

It was Telstra's intention that the compliance manual include the disability CPE product policies (Telstra TTY Program and the Disability Tariff Concession Policy (now called the Disability Equipment Program), guidelines for product and policy development, information and promotional material on Telstra's specialised products and services for people with disabilities, an outline of management and staff compliance responsibilities, and the inclusion of DDA compliance in relevant staff materials.

Since drafting the Disability Action Plan, new methods for storing and disseminating information have been introduced throughout the company, primarily the use of Intranet.

A comprehensive Corporate Disability Manual as such has not been developed. There are a range of materials that have been made available to target groups where a clear need has been identified, some of which are outlined below (also see Strategy 2, action 2.1). In addition, a range of materials is currently being developed which will be available to staff on Telstra's Intranet site.

Materials that have been developed and which would have comprised the Disability Compliance manual include the following:

- The Disability Equipment Program (DEP) Policy is available to those staff who directly administers the DEP Program. No formal policy document was developed for the Telstra TTY Program, which now forms part of the DEP.
- Guidelines for product development were developed as part of the Product Development Process documentation which includes the Disability Impact Statement. These have been made available electronically to all Product Managers and forms the foundations of some of the mandatory stages of the current Product Development Operating Model (see Strategy 6, action 6.1). The completion of the Disability Impact Statement is mandatory for all new product developments.
- Guidelines for the development of information and promotional materials were obtained from Australian Association of the Deaf and National Federation of Blind Citizens of Australia (now called Blind Citizens Australia) and disseminated to management in Telstra's Marketing Communications Group. Additional guidelines have been obtained from Villamanta Publishing.
- Outline of management and staff compliance responsibilities - these have been made available to members of both the Senior Management Compliance Group and the DDA Compliance Working Group, and are broadly outlined in Telstra's Disability Policy.
- DDA compliance guidelines have been included in a range of staff manuals, such as training manuals and Help files.

- Comprehensive DDA related information has been provided via Infofax, which is accessible to managers and staff across all Business Units. Information provided via Infofax was promoted regularly via Telstra's Corporate publications.

Strategy 2: Develop a Disability Awareness Program for all staff

This strategy was intended to ensure that information would be provided to all Telstra management and staff to assist in the improvement of staff awareness of the DDA and issues affecting people with a disability.

***PricewaterhouseCoopers* review found that 83% of actions had been completed or were in progress for this strategy.**

2.1 Develop and implement a comprehensive disability awareness program for all staff.

A working party was established to scope out what the requirements of a Corporate wide Awareness Program would entail. A recommendation was made that a 4-tiered program be implemented.

Tier 1: Top executive management with a “need to know” about Telstra’s legal and regulatory obligations in relation to people with a disability.

Tier 2: Executive management who would have management responsibility for disability related issues within their portfolios.

Tier 3: Managers and supervisors who would be directly supervising staff in customer interface areas or developing products and services that directly or indirectly impact on customers with a disability.

Tier 4: Customer facing staff who have a direct interface either in person or by telephone with customers, including customers with a disability.

Customer interfacing areas were seen as a top priority. Therefore, as a starting point, a comprehensive 2-hour Disability Awareness Program was developed which consisted of a training pack and a 9-minute video. There were three versions of the last section of the training program, which comprised approximately half of the total program, developed, to convey information relevant to:

- customer facing staff;
- telephone sales and enquiry staff; and
- field service staff;

and which contained specific information designed to improve communication with people with a disability.

The video produced provides an overview of the nature and extent of Telstra's obligations in relation to our customers with a disability. In addition, a targeted 30-minute Self-Paced Program was specifically developed for all Operator Assisted Services (OAS) staff. The Self-Paced Workbook was revised in late 1998, and updated to incorporate additional information about newly developed operator assisted services, including the Directory Assistance Disability Helpline.

The Disability Services Awareness training was updated in November 1997, when Telstra's Disability Enquiry Hotline was centralised. This was done in conjunction with the update of Telstra's Disability Equipment Program training.

As previously mentioned, prior to the extensive use of the Intranet, comprehensive information regarding the DDA has been provided via Infofax. This information was accessible to all managers and staff and was promoted regularly via Telstra's Corporate publications.

While the PwC audit found that all existing training modules had not been updated and therefore showed this item as "Not Actioned", where possible DDA principles and responsibilities have been incorporated into all relevant existing training modules, and been included in Induction and EEO training

programs. A Disability Awareness component was included in the *Business Imperatives* course targeted at all managers and supervisors in Tier 3, in the *Executive Perspectives* course targeted at Tier 2 managers. In addition, similar information was provided to Tier 1 managers through periodic Executive Memoranda from Graeme Ward, Group Director, Regulatory and External Affairs.

Telstra's Disability Policy is available on the Telstra Intranet site along with Telstra's policies.

Information has been distributed via the broad range of staff communications media including Telstra's flagship in-house weekly magazine *Our Future*, which is distributed to all Telstra staff nationally and overseas.

2.2 Implement a series of information workshops and presentations for Telstra management, product managers and product developers.

DDA compliance and awareness workshops have been conducted for key areas of the business such as product managers and product developers. In addition, the Disability Services Unit has had ongoing discussions with product managers and developers through the Product Development process.

Strategy 3: Ensure ongoing Consultation and Consideration of Developments External to Telstra

This strategy focused on Telstra continuing to gather information from a range of sources external to Telstra and ensure ongoing consultation with representatives of the disability community.

***PricewaterhouseCoopers* review found that all actions had been completed for this strategy.**

3.1 Continue ongoing community consultation on issues affecting people with a disability.

The Disability Services Consultative Committee (DSCC) met 3 times during 1996 and 5 times during 1997. A broad range of issues was discussed, including strategic regulatory and industry matters and Telstra product and service developments. It was recognised at the end of 1997 that Telstra's consultation program needed to be reviewed and the DSCC was discontinued in its current form.

Telstra convened two meetings in 1998 to specifically consult with a broad range of organisations providing services to people who are Deaf, or have a hearing impairment, on proposed changes to the Disability Equipment Program (DEP) in order for Telstra to meet its obligations as the Universal Service Provider under the *Telecommunications Act 1997* and *Telecommunications (Equipment for the Disabled) Regulation 1998*.

Telstra held the first of its new bi-annual Disability Consumer Forum consultation meetings in March 1999. Initial feedback from this new-style consultation forum was very positive and the second meeting was held on 21 September 1999. A summary report of the forum is produced and circulated to all interested parties in preferred formats. This includes all disability

members of the Telstra Consumer Consultative Councils (TCCC). An HTML version is made available for inclusion on consumer web sites.

Throughout 1996–98, meetings of the national and eight regional Telstra Consumer Consultative Councils were held three times per year. Each of these Councils has at least one representative from the disability community.

The following disability organisations have been involved with Telstra's consultation process at either the national or regional level:

1. ACROD
2. Advocacy Victoria
3. Australian Association of the Deaf
4. Barwon Disability Resource Council
5. Blind Citizens Australia
6. Communication Aid User Society
7. Crippled Children's Assoc of SA Inc
8. Deafness Association NT
9. Deafness Forum
10. Disability Resources Centre (VIC)
11. Disabled Peoples Initiatives (ACT)
12. Disabled Persons International (NT)
13. National Caucus of Disability Consumer Organisations
14. National Ethnic Disability Alliance
15. People with Disabilities (NSW) Inc.
16. People with Disabilities WA Inc
17. Physical Disability Council of Australia
18. Queensland Council of Carers
19. Queensland Disabled Peoples International
20. Tasmanian Council of the Deaf
21. Tasmanians with Disabilities
22. Telecommunications & Disability Consumer Representation Project
23. Victorian Council of the Deaf
24. Victorian Services for Deaf Children Inc
25. VISION Resources NT

By way of example, 44 disability-related issues were raised in these forums in 1996/97 covering matters relating to the Disability Equipment Program, access issues (to Telstra Shops, Payphones, Directory Assistance, etc.), affordability issues, issues or clarification about a range of products and services such as mobiles, EasyCall® features and Call Connect. The issues were sometimes raised by consumers, and sometimes by Telstra as a means of increasing community awareness on particular initiatives or developments. The discussions ranged from short explanations or clarifications through to in-depth briefings and consultation.

A number of regular communications are sent to all TCCC members. These include:

- (i) *Consumer Exchange*, the newsletter of the Consumer Councils, published twice a year, with news about consultation on Telstra's Disability Services (it is also distributed to a wide range of other community and government organisations as well as internally in Telstra);
- (ii) Minutes of the TCCC National meeting;
- (iii) a report by the TCCC Consumer Secretariat produced biannually, which includes a consumer perspective on consultation and where relevant Telstra's Disability Services; and
- (iv) a report of the issues discussed at the regional TCCCs is produced twice per year. When relevant, this includes material that can be included in consumer newsletters about Telstra's Disability Services.

3.2 Periodically update Telstra's catalogue of DDA resource material.

Telstra has undertaken a range of consultation with the Human Rights and Equal Opportunity Commission, representatives of other Corporations, and a range of Government and industry bodies, in addition to seeking periodic legal advice on specific matters, to ensure that Telstra has available to it the

most up to date and fully informed information regarding the DDA, how it might be interpreted and key issues of concern to the disability sector.

A series of workshops were undertaken to brief Product and Project Managers and Product Developers about the Disability Discrimination Act 1992. In addition, as part of the Product Development process, a series of Help Files, which supplement the Disability Impact Statement and other proformas, have been developed.

3.3 Undertake periodic research projects to monitor the needs of people with a disability in accessing telecommunications.

The Telstra Consumer Consultative Council (TCCC) provided resourcing to Blind Citizens Australia in 1996 to undertake a project investigating customer information access for people who are blind or vision impaired. The project highlighted telecommunications more than banking and government information issues because the “telecommunications infrastructure and useability factors” were considered to underpin many aspects of information access. A number of the recommendations made in the report have since been implemented, eg. development of Yellow Pages Direct allows people who are blind or with vision impairment to gain access to Yellow Pages entries, and the introduction of the availability of the Telstra Bill in Braille.

In 1997, Telstra undertook statistically significant research into the usage of the Disability Services page in the front of the White Pages Directory. The results of the survey were utilised to re-format the Telstra information pages in the White Pages directory, which were cited as being a more important source of information than the Disability page. The research also identified the importance of health professionals and service provider organisations in disseminating information to their relevant client base. This information has been utilised to ensure effective targeting of information about Telstra’s products and services for people with disabilities.

Telstra's Disability Services Unit undertook a two-stage market research program to identify the needs of customers with disabilities, involving qualitative and quantitative research. This program was completed in 1997 and provided information on levels of satisfaction with Telstra's range of products and services, as well as levels of awareness of Telstra's Disability Services. This research has assisted in the development of Telstra's communication program being implemented in 1999 and guided the development of some new services for people with disabilities.

Telstra's Research Laboratories (TRL) undertook a study to improve access to Telstra's Internet services for customers with a vision impairment. It focussed on two Internet-based applications that were currently under development at TRL and resulted in a number of outputs in 1998, including sets of guidelines and checklists which give Telstra Human Factors researchers and Web designers a practical guide into making web sites accessible for people with a vision impairment. The project also provided input for improvements to the Telstra homepage.

The Telstra Consumer Consultative Council (TCCC) provided resourcing to the Communications Aid User Society (CAUS) to undertake a research study into the "Telecommunications Needs of People with Communication/ Speech Difficulties". Deakin University completed the study in February 1998.

Strategy 4: Improve Accessibility to Telstra's Buildings and Facilities

The aim of this strategy was to provide a mechanism to identify buildings and facilities which may not be fully accessible to people with disabilities.

***PricewaterhouseCoopers* review found that 90% of actions had been completed or were in progress for this strategy.**

4.1 Review Property Services practices to identify areas for reform.

A building audit process has been developed. Corporate Property Services has formulated the "National Disability Access Implementation Program". The aim of the program is to provide equitable access to all Telstra corporate owned and leased properties. In order to achieve this, the program has been developed in two stages:

Stage 1 - Identification of non-compliance items by conducting access audits.

Stage 2 - Rectification of non-compliance items.

An audit of all buildings and facilities was commenced in 1996 with key strategic buildings being targeted for assessment, and where required, upgraded initially. Other buildings and facilities will be assessed progressively over the next five years.

Pre-leasing agreement forms were reviewed. The Works Projects Management System and Property Management System document all work procedures. Work processes have also been documented.

4.2 Development of a Corporate Access Policy

A Telstra Access Advisory Panel (TAAP) was formed by Corporate Property Services in 1996 to act as an advisory board on matters relating to physical access to, within and from Telstra's corporate accommodation buildings, as well as a wide range of other disability issues.

The purpose of the TAAP is to assist and support Corporate Property Services in achieving the objectives of the Telstra Disability Action Plan and ensure compliance with the *Disability Discrimination Act 1992 (DDA)*.

The TAAP meets quarterly and consists of peak representative bodies, industry technical experts, and advocates representing all areas of disability and also representatives of Telstra employees with a disability.

4.3 Communicate access policies and practices to relevant staff.

Disability Awareness Training Seminars were delivered to all Corporate Property Services staff to assist in meeting Telstra's commitments with respect to the DDA and the Telstra Disability Action Plan.

Corporate Property Services, with the assistance of the TAAP, has formulated access policies, guidelines, an access audit checklist and emergency evacuation procedures for people with disabilities.

4.4 Develop and implement a Works Program (to include targeted completion dates)

The PwC review found that this action point had not been actioned. Since the review, works programs have been completed for each State covering priority one buildings, ie. those buildings which have a high profile/high public usage

within each State. Audit summaries are continuing for remaining buildings and works programs are being continuously updated.

However, in relation to the Telstra Retail Shop network, with the assistance of the TAAP and various access consultants, a “Retail Shop Disability Design Brief” has been developed. This document has been applied to the new designs and refurbishment of the Telstra Retail Shop outlets on a national rollout program. The brief outlines and specifies design requirements to be followed to accommodate people of all abilities, therefore making the shops accessible to all members of the public.

The standard retail fitout currently being implemented incorporates a continuous process of design review by an Access Consultant and the TAAP. An appointed access consultant reviews all proposed shop design details (which have been developed in accordance with the design brief) and provides recommendations in relation to improved access design for people with disabilities. Upon completion of the retail shop fitouts, the access consultant conducts a post occupancy evaluation of the shop.

All new retail shop fitouts are incorporating a hearing induction loop at the main inquiry/service counter to accommodate people with hearing impairments.

4.5 Establish a process for reviewing any complaints/suggestions regarding Telstra’s Access Plan and communicate this to staff and customers.

This process has not been documented due to the very low level of complaints/suggestions that have been received. Any complaints/suggestions that are received are dealt with immediately, and can usually be resolved within Corporate Property Services.

Strategy 5: Improve Accessibility to Information for People with a Disability

The aim of this strategy was to ensure that customers with a disability have equal access to Telstra general sales and billing information services.

***PricewaterhouseCoopers* review found that 89% of actions had been completed or were in progress for this strategy.**

5.1 Ensure the continuation of equitable access to Telstra's customer services.

Telstra's TTY Enquiry Line provides a parallel service for people who are Deaf to Telstra's main sales and general information service 13 2200. Access to the TTY Enquiry Line was extended to 7 days a week until the time that the service was relocated with the Disability Enquiry Hotline (DEH) when the DEH was centralised in November 1997. The service now operates standard business hours, Monday to Friday, 8am to 5pm. There are no plans to expand the operating hours of this service.

Due to the relatively low numbers of calls to this service, customer satisfaction levels for these services cannot be monitored using Telstra's standard monitoring surveys. However, the service is monitored by the National Telemarketing Centre management in line with other services provided within that centre and Grade of Service ("GOS") (the percentage of calls answered within 10 seconds) is consistently around 95%, with GOS for other services being at around 80-85%.

TTY access to Telstra is published in the Telstra information pages in the front of the White Pages Directory, in the TTY Directory and in the publication *A Guide to Telstra's Services for Residential, Business and MobileNet® customers*, which is also available on the Internet.

Telstra's Aged & Disability Centres have a central TTY number - 1300 366 299. This service can be accessed for the cost of a local call.

Staff at Telstra's Disability Enquiry Hotline have received TTY training and now rotate through the group so that they regularly handle TTY calls and are able to keep their skills up to date.

Information about Telstra's Disability Services can be accessed via the Telstra Internet site at www.telstra.com.au.

5.2 Develop information materials in a range of alternative formats.

Telstra developed a brochure *Services for people with disabilities*, which it launched in July 1997. The brochure was developed in four community languages, braille and audio cassette.

The brochure was distributed via a direct mail campaign to local councils, disability consumer and service provider organisations, key government departments and agencies, telecommunications industry agencies and other key stakeholders. As part of the direct mail campaign, organisations were provided with an order form for multiple copies of the brochure in printed English or another language or format.

Telstra utilises the services of the Telephone Interpreter Service where an enquiry is received from a person who has a disability and who does not speak English. Telstra also has multilingual sales cells and can assist people who speak Mandarin, Cantonese, Greek, Indonesian, Italian, Korean and Vietnamese, in their own language. These numbers are published in the information pages of the White Pages Directory.

5.3 Consider the provision of key information and promotional material in alternative formats.

The TTY Directory was developed in braille in 1996 and Telstra had the intention of ensuring that each year the Directory was also developed in braille. Two issues have impacted on the subsequent printing of the TTY Directory in braille:

- Telstra's National Directory Services was sold to Pacific Access in 1997; and
- the change to 8 digit numbering in Sydney and Melbourne delayed the printing of the Directory until late last year.

The *Guide to Using Telstra's Telephone Services* was first developed in 1995.

Captions are provided on all Telstra advertisements, including those where the on-screen print matches the voice over.

Various areas of Telstra have been involved in projects to assess whether, and ensure that, Telstra's website is accessible. This has included involvement with the Australian representative on the World Wide Web Consortium (W3C), a major research project undertaken by the Human Factors Group at the Telstra Research Laboratories, and discussions with Telstra's website managers and developers.

It was Telstra's intention to establish a formal process for reviewing requests for converting information into alternative formats when required or upon request. For those projects where information in an alternative format was clearly required by customers where a product which would impact on everyone, such as with Calling Number Display, this has been provided. In addition, Telstra has responded to all reasonable requests from individuals for information in other than a printed form. These requests have usually been made through the Telstra Consumer Councils, Telstra's Disability Enquiry Hotline or one of Telstra's Aged & Disability Centres.

5.4 When completed, review the recommendations of the National Federation of Blind Citizens of Australia (NFBCA) report "Consumer Information Project".

There were 18 recommendations made in the NFBCA report that related specifically to Telstra. Of these, 13 of the recommendations have been considered or implemented, with a further 2 recommendations currently being implemented. Two of the recommendations could not be implemented at this time. A further recommendation is no longer valid because the Telstra service referred to no longer exists.

Examples of the recommendations that have been implemented are the provision of exemptions on Telstra Call Connect, the expansion of the Hello Yellow service, now called Yellow Pages Direct, and the provision of the Telstra Bill in Braille.

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

This strategy aimed to ensure that a formal process was established whereby any new products under development were assessed for potential accessibility to persons with a disability, and that customers with a disability be included in the useability testing of products where possible.

***PricewaterhouseCoopers* review found that 75% of actions had been completed for this strategy.**

6.1 Ensure all new products and services are assessed for potential accessibility to persons with a disability.

All product managers and product developers are now required to submit a Disability Impact Statement which is completed at the concept stage of the Product Development process.

The vast majority of projects assessed were for network modifications or were targeted at large businesses without any end impact on consumers. Of the 279 products assessed from 7 May 1996 to 31 December 1998, 17 were found to have a potential impact on accessibility by people with a disability. Where a product is identified as having a potential impact, the Product Manager is required to conduct further testing or analysis as advised by the Disability Services Unit. The product development of that product is then tracked, and where appropriate consultation with relevant sections of the disability sector are conducted

6.2 Include people with a disability, wherever possible, in the useability testing for new products.

PwC has recorded this particular action point as “Not Actioned”. People with disabilities are not always specifically included when performing product testing. A list of participants is usually obtained from an independent consulting agency that generally does not specifically target people with disabilities.

However, where a product is identified as having an impact on a particular sector of the disability community, Telstra seeks the guidance and assistance of representatives of that sector through its consumer consultation processes. Examples of specific outcomes that have been achieved through consumer consultation are the exemptions on Telstra Call Connect, and the provision of the Telstra Bill in Braille. Consumer representatives on Telstra’s Disability Services Consultative Committee, assisted Telstra in the development of its policy and application form for the exemptions on Telstra Call Connect. In addition, representatives from National Federation of Blind Citizens Australia assisted and advised Telstra in its development of the Telstra Bill in Braille.

Consumer representatives have, through the consumer consultation process, urged Telstra to use people with disabilities when developing or testing products and services. This is done wherever possible.

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.

The Secretariat of the Telstra Consumer Consultative Council attempted to gain the participation of people with disabilities through a disability consumer representative on the TCCC Victoria. However, despite a number of invitations, the invitation was not taken up.

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

This strategy was aimed at improving accessibility to Telstra's existing products and services. The strategy specifically addressed six products and services. These are discussed below.

Customer Premises Equipment

The main aim of this section was to establish the Telstra TTY Program and to ensure that Telstra staff and its customers were informed about the Program. In addition, Telstra aimed to review the pricing principles that apply to CPE provision.

PricewaterhouseCoopers review found that 100% of actions had been completed or were in progress for this strategy.

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.

The Telstra TTY Program was established by Telstra and commenced operation on March 1 1996. The program was administered by Australian Communication Exchange and supplemented Telstra's voluntary equipment provision program, the Disability Equipment Program (formerly the Disability Tariff Concession Policy) administered by Telstra.

A media release announcing the launch of Telstra's TTY Program was issued to national print and electronic media and to specialist press and disability consumer organisations. As a consequence, a series of interviews were conducted on metropolitan and regional radio. A direct mailout to disability consumer and service organisations Australia wide was conducted at the time of launch.

Significant staff communication was undertaken prior to, and after, the launch of the Telstra TTY Program, with a range of staff briefing materials being disseminated, supplemented by staff briefings, and placement of articles in all Telstra's major internal publications and dissemination via Corporate e-mail.

With the introduction of the *Telecommunications Act 1997*, the universal service obligation has been expanded to include the obligation to supply customer equipment upon request to a person with a disability to enable them to access the standard telephone service supplied by Telstra.

Telstra's Disability Equipment Program has now been expanded to include the provision of equipment formerly made available under the Telstra TTY Program and the National Relay Service - Telecommunications Equipment Access ("NRS-TEA") Program. The expanded program commenced operation on 17 September 1998.

Three models of TTYs and two models of modems are currently available under this integrated program. Eligible customers can rent the equipment from Telstra at a (current) annual hire charge of \$30, the same charge as for the standard rental telephone handset. The equipment remains the property of Telstra. If the equipment becomes faulty, Telstra will maintain the equipment at no additional charge to the customer, providing the fault is due to reasonable wear and tear.

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.

All equipment provided through Telstra's Disability Equipment Program (DEP) is provided at the same rental charge as the standard rental telephone handset, ie. currently \$30 per annum, irrespective of the cost of that equipment

Telstra, through its breadth of products and services, aims to provide a range of product and pricing options to its customers. Where a commercial product provides basic access to the standard telephone service for a person with a disability who would not otherwise be able to access that service, Telstra has through its consumer consultation process, developed equitable pricing policies for those products or developed specialised services where required.

Payphone Services

This strategy focused on improving accessibility to Payphones along with increasing awareness of the needs of people with a disability. A review of internal procedures and policies for processing requests for modified Payphones was also to be conducted.

PricewaterhouseCoopers review found that 100% of actions had been completed or were in progress for this strategy.

7.3-7.7 A range of actions were documented to ensure the development of a Payphones Access Policy in consultation with disability and community groups, to implement those procedures and to plan for the alteration of existing facilities, and to review the Policy.

The Payphone Access Policy, first issued in 1993, was revised in consultation with disability and consumer groups during the term of the Plan. The policy was used as a guide to the sorts of features required in the new Telstra Smart Payphone. Telstra is currently replacing most of its existing payphones with the new model payphone and is expected to complete rollout on a national basis by the end of 1999. The new payphone has an in-built hearing aid coupling device, volume control feature and is generally accessible by wheelchair. It is both coin and card operated and takes all Australian coins.

Payphone issues relating to siting and accessibility have been raised in Telstra's consultative forums. Telstra management has attended these forums to respond to the issues raised. Some issues have related specifically to the availability and siting of TTY payphones, and the development of a TTY Payphone siting survey was proposed by consumer representatives. This proposal has been implemented and consultation on the findings will be an action to be included in the new Plan.

Operator Assisted Services

The action points relating to Operator Assisted Services (now called Telstra Information and Connection Services - TICS) focussed on TTY access to emergency services and general access to Operator Services for people with disabilities.

***PricewaterhouseCoopers* review found that 100% of actions had been completed or were in progress for this strategy.**

7.8 Ensure TTY accessibility to emergency 000 services.

Agreement was reached in January 1996 between Australian Communication Exchange and Telstra for TTY access to the emergency service number 000 via the National Relay Service through FREECALL™ 1800 067 167.

Telstra's operators answer some nine million calls to 000 each year. Of these, only a small proportion (30%) are genuine emergency calls, with the vast proportion being hoax or misdialled calls to fax machines or overseas numbers. There are approximately 120 operators who are trained to handle calls to 000.

In order for a call from a TTY to 000 to be answered by a Telstra operator, the operator would have to first distinguish the TTY tone from a fax or modem call, and then be sufficiently skilled in the use of a TTY, Deaf culture and TTY etiquette to handle the call appropriately. This option was seen as posing a greater risk to the customer than having those calls answered by a Relay Officer at the National Relay Service who was skilled in the use of a TTY. Telstra worked with the various Deaf organisations and the National Relay Service to promote the establishment of the TTY Emergency Call number. The number is promoted in the inside front covers of the White Pages Directory and the TTY Directory.

A separate three-digit emergency number has now been established by the Australian Communications Authority and is presently being tested for implementation. This emergency number is expected to give faster access to emergency services for people with disabilities. Access to this number will be operational from 1 March 2000 when the new *Telecommunications (Emergency Call Person) Determination 1999* ("ECP Determination") comes into operation. Under the ECP Determination, the NRS Provider (which is currently Australian Communications Exchange Ltd) is specified to be the national operator of emergency call services for calls made to the emergency service number 100.

7.9 Investigate any difficulties in accessing Telstra's Operator Assisted Services, in consultation with the community.

Telstra has operated a Directory Assistance Disability Helpline (DADH) since 1988 for people who need more time and assistance with Directory Assistance (013). In 1996 the policy was revised in consultation with consumer groups to ensure the service met the needs of consumers who could not read, hold or use the White Pages directory and are unable to satisfactorily use the 013 service. The Helpline currently has over 1000 registered customers.

Some difficulties and complaints were reported by people who were not able to access address information through Directory Assistance. As a result, a revised learning brief was developed and distributed to OAS staff in late 1998.

Directory Services

The aim of this strategy was to improve Directory Services for TTY users, along with other services provided for people with a communications impairment.

***PricewaterhouseCoopers* review found that 100% of actions had been completed or were in progress for this strategy.**

7.10 Establish a process to upgrade and improve the accuracy of the TTY directory

A TTY Directory - User Survey is scheduled for distribution at the time of delivery of the new issue directory in 1999.

In order to improve the level of service to clients of the Telephone Typewriter Directory, Pacific Access is currently drafting the Product Plan and Rates Proposal. This document covers development and product improvements and will be incorporated into the 1999-2002 Product Plan.

Pacific Access provides TTY access to its product support area. Staff are trained in the use of a TTY.

The Directory Assistance Disability Helpline, established in 1988, continues to provide assistance to people with a speech or communications impairment. In addition, a range of Directory products, including the *White Pages™* on the Internet, has been developed to provide alternative access to Directory information.

Mobile Communication Services

This strategy involved monitoring and consultation in relation to issues faced by hearing aid users and people with a disability when using mobile phones.

***PricewaterhouseCoopers* review found that 100% of actions had been completed for this strategy.**

7.11 Monitor technological developments for TTY/text interface equipment to identify opportunities for making TTYs more accessible to mobile communication products.

The incompatibility of TTYs and mobile technology remained an outstanding issue for the term of the Plan, and although the issue was investigated and discussed, there appeared to be no immediate solution. It seems that there are now overseas examples of mobile textphones. This breakthrough will be identified as an action for further investigation under Telstra's new Disability Action Plan.

7.12 Continue to consult with industry bodies, disability groups, AUSTEL (now Australian Communications Authority) and the government to resolve the issue of GSM interference to hearing aids.

There has been a considerable focus on the government's decision to close the analogue network in major metropolitan areas and some country areas on 31 December 1999, with total phase out in the remaining rural areas by 31 December 2000. People with hearing aids are concerned that digital mobile phones may cause interference with their hearing aids.

Telstra's CDMA network is planned to enter service during the latter part of 1999 and when completed in 2000 will provide reasonably equivalent coverage to Telstra's AMPS and GSM networks.

Telstra has commissioned independent testing through Australian Hearing. This testing is showing preliminary results that are encouraging. A clearer indication will be available after the testing has been completed. This issue remains one for further action under the new Plan.

Other Products and Services

This strategy aimed to improve the accessibility of products and services provided by Telstra, its subsidiaries and its commercial partners as a result of customer feedback through a range of communications channels.

***PricewaterhouseCoopers* review found that 33% of actions had been completed.**

7.13 Review other existing products and services, on an ongoing basis.

Issues in relation to products and services raised in Telstra's consultative forums, customer complaints recorded in accordance with Telstra's complaint management process, complaints to the HREOC, the Telecommunications Industry Ombudsman ("TIO"), the Australian Communications Authority ("ACA") and Ministerials, information received through journals and other publications, and information received from Product Managers through the Product Development process, are all taken into account and form the basis of decision making.

7.14 Ensure Telstra's Disability Policy is also adopted by Telstra's subsidiaries.

The adoption of Telstra's Corporate Policy - Disability by its subsidiaries and joint venture partners is to be considered over the next six months. The policy is available on the Telstra Intranet site, to which all Australian subsidiaries have access.

Strategy 8: Maintain Telstra's Commitment to the Elimination of Discrimination in the Workplace in Accordance with Telstra's EEO Policy.

Areas such as compliance with Telstra's employment policies and increasing employment opportunities for people with a disability were addressed in this strategy.

***PricewaterhouseCoopers* review found that 100% of the actions in this strategy were completed.**

8.1 Review Telstra's employment policies and practices to ensure all are non-discriminatory.

Telstra's Senior EEO Consultant, Disability is part of the Employment team within Employee Relations. It is this team which is responsible for the design and development of Telstra's employment policies and practices. Maintaining a profile in this area of the organisation has ensured disability issues are considered when changes are made to policies or procedures or where new processes are being developed.

In addition to disability being included in all statements pertaining to Telstra's Fair Treatment process, Equal Employment Opportunity and Recruitment, a separate statement specifically for disability discrimination has been designed. All Telstra staff can access this information via Telstra's Intranet.

Documents including training notes, information relating to Telstra shares and Telstra staff share offers, brochures, Telstra's Code of Conduct and articles from *Our Future* have been made available in braille to Telstra staff who are blind. Documentation has also been made available in large print for staff requiring this format.

Deaf staff have been provided with Auslan interpreters for team briefs. Information on subjects including health and safety, employment information, Telstra's Fair Treatment process and policies such as EEO are provided to staff in these meetings. Interpreters have also been utilised at information sessions conducted in order to provide Telstra staff with information about staff share offers.

The Telstra Intranet is accessible to all staff. Information provided includes policies and procedures relating to all aspects of employment. The Intranet has been beneficial in that it has provided more flexible access for staff with sensory disabilities. The information can be captured and presented in a variety of formats. A person with a vision impairment can access the information using voice adaptive technology to have the information read aloud via computer, or use a zoom facility to enlarge the size of the text.

8.2 Facilitate further employment of people with a disability within Telstra.

Telstra's Disability Employment Program continues to be successful in providing employment opportunities for people with a disability.

Telstra's recruitment and selection policies and procedures support the commitment Telstra has to the employment of people with a disability. Telstra's recruitment policies and procedures stipulate that people with a disability and Aboriginal & Islander applicants need only to be considered competent to do the work to be selected, as opposed to the best person based on merit. Further for external recruitment, all vacancies are to be referred to the Senior EEO Consultant, Disability. This inclusion provides a greater opportunity for people with a disability to have access to information about the job.

Telstra's preferred suppliers have been provided with information relating to Telstra's EEO commitments and in many instances have been provided with information sessions on Telstra's Disability Employment Program. Many of Telstra's preferred suppliers have accessed training to enhance their ability to

meet Telstra's targets in the area of recruitment of people with a disability. This training has been provided by a number of agencies including Central Marketing Services, an organisation funded by the Employer Incentives program within the Department of Family and Community Services and the Commonwealth Rehabilitation Service.

Increasingly employment in Telstra includes temporary and casual jobs. As these opportunities have increased Telstra has undertaken work with preferred suppliers and disability specific agencies to increase opportunities for people with a disability in temporary and casual job markets within Telstra. This work has resulted in an increase in representation of people with a disability gaining employment within Telstra.

Telstra offers EEO Scholarships to students who are members of the EEO target groups. People with a disability have been amongst those awarded these scholarships in the last 2 years. The scholarships include a monetary component and employment.

Telstra established its Paralympic Employment Program (PEP) in June 1997. Through this program, Telstra aims to employ up to 10 Paralympic level athletes by the Year 2000. Candidates are chosen on merit and where a suitable job opportunity exists. To date six athletes have been employed under this program.

People with a disability have also been employed through Telstra's Graduate Program.

Telstra continues to make reasonable adjustments to the physical environments in which people with a disability work, and the job roles where necessary and as appropriate.

Strategy 9: Incorporate DDA Requirements into Existing Telstra Policies and Programs.

This strategy aimed to ensure that customer information remain confidential, that Telstra's policies be non-discriminatory and ensure its pricing of products and services provided to people with a disability are reviewed.

***PricewaterhouseCoopers* review indicated that 100% of actions outlined under this strategy have been completed.**

9.1 Ensure any information collected to verify a customer's disability remains confidential in strict adherence with Telstra's Privacy Policy.

Telstra is committed to the protection of personal privacy. To meet this commitment, Telstra has adopted a set of principles, policies and procedures to protect the privacy of its customers. These were developed in consultation with the Telecommunications Industry Ombudsman and the Privacy Commissioner, and include:

- The proper use and protection of customer personal information and information gathered in the course of service provision by Telstra;
- The need to actively consider privacy issues as new products and services are developed.

Telstra maintains an independent compliance audit program to ensure its Privacy Protection Principles and policies remain appropriate and that it operates in compliance with those principles and policies. A Privacy Audit Panel monitors the independent program. A yearly report on the audits conducted under the auspices of the Privacy Audit Panel, and their outcomes, is available to the public.

The consideration of privacy issues in the development of new products and services is executed through Telstra product development process which ensures impacts in relation to privacy are identified and conform with Telstra's privacy policy.

9.2 Review other policies as and when the need arises to ensure they are non-discriminatory.

Policies have been reviewed in light of Telstra's Disability Action Plan with adjustments being made to Telstra's product and service offerings.

9.3 Review the pricing principles applied to products and services provided to people with a disability as required.

The principal example of a pricing review affecting products and services provided to people with a disability is the development of the annual rental charge of disability equipment under the Disability Equipment Program which is the equivalent to the rental charge of a standard telephone handset.

One outstanding issue that has been strongly represented by the Deaf and speech-impaired community has been the cost of long-distance calls for TTY users. The issue stems from the longer time it takes to communicate with a TTY. The difficulty for Telstra is that the network cannot distinguish between a TTY and voice call. However, we note that the real cost of long distance calls has dropped dramatically in recent years.

5.2.1 Consumer Feedback

As mentioned earlier, not all organisations that were invited to provide feedback did so, and feedback was not received on each action. The following section provides an overview of the qualitative assessment by some of the nine members of Telstra's Disability Consumer Forum, and is based on the individual's knowledge of Telstra's activity in a particular area.

Consumer representatives provided feedback on the implementation of Telstra's Disability Action Plan on four strategies, these being:

- Strategy 3: Ensure ongoing community consultation
- Strategy 4: Improve accessibility to buildings and facilities
- Strategy 5: Improve accessibility to information
- Strategy 7: Improve accessibility to existing products and services, including CPE, Payphones, OAS, Directory Services, Mobiles, and other products and services

Generally consumers responded that they were 'partly satisfied' in the majority of cases where a response was given. However, the variety of responses to some actions was quite mixed with responses ranging from 'satisfied' to 'not satisfied'. This disparity in feedback seems to reflect sector specific differences in needs and highlights the very real difficulty of providing products and services that are accessible to all people with a disability.

Consumer organisations indicated the highest level of satisfaction with Telstra's consultation process and the research projects it had undertaken (strategies 3.1 and 3.3). Consumers comments reflect that they still feel that consultation is too infrequent, but acknowledged that this has increased over the past few years. Consumers' views differed on whether the research that Telstra has conducted is sufficient, with some consumers stating that they would like to see Telstra being more proactive in initiating research projects generally, but specifically developing unique customer equipment not made

elsewhere in the world. Where research projects have been undertaken, consumer feedback indicated an expectation that all recommendations of any report could, and would, be implemented. Research is used as a guide in Telstra's planning process, and some recommendations will at times not be implemented, because of technical limitations or for commercial reasons.

Consumers expressed a level of satisfaction, but not without some reservations, with the provision of information in alternative formats (strategies 5.2 and 5.3), the establishment of the TTY Voucher Program (strategy 7.1), the review of the Payphones Access Policy (strategy 7.4), the upgrade of the TTY Directory (strategy 7.10) and Telstra's consultation with industry bodies etc, on the issue of GSM interference and hearing aids (strategy 7.12).

The issue of greatest concern to consumers was TTY access to emergency services. Consumers felt that the current arrangement of contacting Emergency Services by calling via the National Relay Service on FREECALL™1800 067 167, was seen to be an unacceptable compromise. As indicated in the discussion of strategy 7.8, a new three-digit number has been established and will be operational by early next year.

Other areas of concern raised by consumers were with strategies 7.8 and 7.9 - access to Operator Assisted Services (now called Telstra Information and Connection Services), and the provision of public payphones (strategies 7.3-7.7), with consumers indicating that these services were not fully accessible by all persons with a disability.

6. HREOC Complaints

During the life of Telstra's Disability Action Plan there have been 5 disability discrimination complaints referred to Telstra by the Human Rights and Equal Opportunity Commission. Telstra was notified of one complaint late in 1997 and a further four complaints during 1998. Two of these complaints have been closed.

The broad nature of the complaints are as follows:

- Access to Telstra's new public payphones - complaints;
- Bill payment methods and access to address information via Directory Assistance;
- Access to address information via Directory Assistance; and
- Access to mobile services for a customer with a hearing aid upon closure of the AMPS (Advanced Mobile Phone System) Network.

The process for receiving and responding to a complaint is that the Disability Discrimination Commissioner writes to Telstra's Chief Executive Officer to notify him of the complaint. Telstra has 21 days in which to respond.

Telstra's Disability Services Unit is usually notified of the complaint by the Chief Executive Officer's Office and oversees the dissemination of the correspondence to the relevant Business Unit/s or business area/s within the Corporation and, where appropriate, will coordinate Telstra's response to the Commission and participate in any conciliation conferences.

7. Future Direction

As outlined above, Telstra has completed approximately 65%, and has another 26% in progress, of the actions outlined in its nine strategies in its first Disability Action Plan. We feel that this is a positive result when considering:

- the size of the Corporation and the breadth of its product and service offerings;
- the significant change within the telecommunications industry since the Plan was first submitted; and
- Telstra was the first corporation to prepare and submit a Disability Action Plan to the Human Rights and Equal Opportunity Commission.

Telstra acknowledges that there are areas where it can improve access to its products and services. We are currently in the process of preparing our next three-year Disability Action Plan and this will incorporate key areas identified as requiring improvement. The next Disability Action Plan will also incorporate those actions/activities that are currently “in progress” or “not actioned” from our first Plan where appropriate.

As detailed in our initial Plan, consideration is being given as to how best mainstream the Disability Action Plan initiatives into Telstra’s normal business planning within each of the business units. Our aim is to ensure that the initiatives are addressed on a regular basis by the business units thus improving the services and products offered to people with a disability.

In addition to the Disability Action Plan, Telstra’s Disability Services Unit undertakes a range of activity to ensure that access to Telstra’s services, and that an awareness of the needs of people with a disability, are maintained.

For example:

- Telstra has sponsored **LINK** magazine for 5 years. The magazine’s subscribers are primarily people with a disability, community and service provider organisations and health professionals.

- Through targeted sponsorships Telstra seeks to positively promote the abilities and aspirations of people with a disability.
- The reformatting of the Telstra pages in the White Pages telephone directory in 1998/99 provided an opportunity to more prominently include the contact numbers of services for people with disabilities. The FREECALL numbers for the Disability Enquiry Hotline and the TTY Enquiry Line now feature on page 2 of the White Pages, directly under the principal contact numbers for sales, billing and product information.
- The Guide to Telstra's Services for Residential Business and MobileNet® Customers, also published on Telstra's Internet site, includes a section on Telstra's Disability Services. The Guide, now in its third edition, was initially launched in 1995.
- The Disability Enquiry Hotline (DEH) is the primary contact point for customers wishing to enquire about or apply for equipment under the Disability Equipment Program.
- The six Aged and Disability Centres have been maintained and continue to provide a contact point for people with disabilities.

Telstra is proud of the progress it has made to date, and remains committed to ongoing improvement in access to its products and services, building facilities, and employment opportunities for people with a disability.

APPENDIX 1:

Letter from PricewaterhouseCoopers

Dated 12 November 1999