



ANZ Group Regulatory Compliance

Disability Action Plan

September 2002

Australia and New Zealand
Banking Group Limited
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Introduction

ANZ is a leading banking and financial services organisation with about 22,500 people employed in 29 countries around the world. We have a history that stretches back more than 160 years, and a future being built around a strong performance culture.

Our overriding philosophy is that ANZ is the bank with a human face in our interactions with our customers, our shareholders, the community and with each other. This is supported by our values:

- Put our customers first
- Perform and grow to create value for our shareholders
- Lead and inspire each other
- Earn the trust of the community
- Breakout, be bold and have the courage to be different.

We see the development and implementation of our Disability Action Plan as a key feature of ANZ's commitment to our customers, our staff and the community. It's a guarantee that we are working hard to ensure that our products and services are accessible to everyone – whether they are a person with a disability or not, and that our workplace is welcoming and inclusive of people with a disability.

The action items contained in our Disability Action Plan address the issues of accessibility and usability of:

- Our communications with customers, staff and the community
- Our property and premises, and
- Our services (including technology-based banking services).

Also, the action items are aimed at ensuring that we:

- Increase staff understanding of disability issues through an ongoing awareness campaign and better training
- Review our workplace and employment policies and practices to ensure that ANZ is an employer inclusive of people with disabilities, and
- Review the effectiveness of our Action Plan on a regular basis, and update it regularly.

ANZ's Disability Action Plan complements our Customer Service Charter, which sets out how we plan to provide all of our customers with a better level of service and further restore their faith in us. Copies of ANZ's Customer Service Charter are available in branches, by calling us on **131314** or on ANZ's Internet site at www.anz.com. Hearing or speech impaired customers can also utilise the TTY service by calling **1300 366 255**.

Our Aim

In developing our Disability Action Plan we aim to ensure that people with a disability have equal access to all ANZ properties, products, services and information. We are also striving to strengthen diversity at ANZ, to create a work culture and environment where employee differences are valued and leveraged for organisational success.

Our Customer Disability Discrimination Policy

ANZ's Disability Action Plan has been developed in accordance with our Customer Disability Discrimination Policy. Our policy recognises the special needs of people with a disability, and our obligation not to discriminate against customers on the grounds of disability.

The policy states that wherever practicable, ANZ's properties, products, services, information and other communication must be accessible to people with a disability. Where full and equitable access cannot be provided because of the impact of disabilities, alternative products or services should be provided by ANZ at no additional cost to the customer.

The policy also provides that information on ANZ's commitment to people with a disability and the special arrangements made for persons with a disability should be readily available. As such, our Disability Action Plan will be available online, in ANZ branches and by calling our Australasian Contact Centre on **131314**. Hearing or speech impaired customers can also utilise the TTY service by calling **1300 366 255**.

Issues of equal opportunity in employment are not addressed in ANZ's Customer Disability Discrimination Policy, as these are addressed in our employment policies and Diversity Charter.

What is a Disability?

The *Disability Discrimination Act 1992* (C'lth) defines disability in relation to a person as:

- (a) total or partial loss of the person's bodily or mental functions; or
- (b) total or partial loss of a part of the body; or
- (c) the presence in the body of organisms causing disease or illness; or
- (d) the presence in the body of organisms capable of causing disease or illness; or
- (e) the malfunction, malformation or disfigurement of a part of the person's body; or
- (f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or

(g) a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour;

and includes a disability that:

- (h) presently exists; or
- (i) previously existed but no longer exists; or
- (j) may exist in the future; or
- (k) is imputed to a person.

How ANZ Went About Developing Our Disability Action Plan

Development of ANZ's Disability Action Plan has been a long-term project, and is closely linked to many of our other initiatives designed to 'put customers first'. In a large organisation like ANZ, reviewing our current facilities, services and practices to ensure that they are not discriminatory towards customers and staff with a disability, as well as the community in general was a significant task.

To start, we established a Working Party, an Advisory Group and a Disability Action Plan Steering Committee. A team this large was brought together to ensure that ANZ's Disability Action Plan covered all aspects of the business, from Regulatory Compliance, to Marketing, Property, Personal Banking, Electronic Banking and Human Resources.

The members of the Working Party took on the job of auditing our business and identifying specific areas where ANZ could better meet the needs of customers and staff with a disability. The issues identified formed the basis of our Disability Action Plan, which the Steering Committee and Advisory Group then reviewed and commented on. We then consulted the business and relevant internal and external stakeholders, including disability advocacy groups, and the Human Rights and Equal Opportunity Commission to ensure that our Disability Action Plan would successfully meet the needs of customers and staff with a disability.

Industry Standards on Disability Access

In addition to developing our own Disability Action Plan, ANZ has been actively involved in the development of industry disability standards. The voluntary standards - covering Automated Teller Machines (ATMs); Electronic Funds Transfer at the Point of Sale (EFTPOS); Automated Telephone Banking and Internet Banking - were developed by the Australian Bankers Association following the release of a Human Rights and Equal Opportunity Commission report on access to e-commerce for older Australians and people with disabilities. Implementing the initiatives of the industry standards is just one aspect of ANZ's Disability Action Plan.

The standards are available on the ABA's website at <http://www.bankers.asn.au>.

Our Objectives & Proposed Actions

1. Improved Communication

Openly and transparently communicating with customers, staff and the community in general is central to the way we do business at ANZ. The initiatives we've developed to improve our communication are aimed at ensuring that the information we provide to customers, staff and the community is clear, accessible to and usable by people with a disability.

In addition, a number of the communication initiatives relate to increasing awareness of disability issues, and ANZ's commitment to customers and staff with a disability both internally, and in the wider community. We also place great importance on liaising with interested advocacy groups, industry bodies and the Human Rights and Equal Opportunity Commission on initiatives we can take to better accommodate the special needs of ANZ customers and staff with a disability.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Communicate launch of ANZ's Disability Action Plan to interested individuals and bodies.	Manager Regulatory Compliance Policy, Group Risk Management.	30/09/2002	Disability advocacy groups, HREOC, customers and staff will be aware of the key commitments that ANZ has made to ensure that its products, services and employment opportunities are accessible to, usable by and inclusive of people with a disability.
Include a promise that embodies ANZ's commitment to customers with a disability in ANZ's Customer Charter.	Manager Customer Service Charter, Personal Banking.	30/04/2003	In addition to the Action Plan, ANZ's Customer Charter will make a commitment to people with a disability.
Review ANZ's compliance with the Customer Charter promise to customers with a disability annually.	Manager Customer Service Charter, Personal Banking.	30/09/2003 and ongoing	ANZ's Compliance with our Customer Charter will be audited annually (by external auditors). Results of the audit will be made publicly available.
Review signature and identification policies to provide easy access and use by customers with a disability.	Head of Risk & Compliance, Personal Banking.	31/12/2003	Signature and identification policies and processes will adequately address accessibility and usability issues as they relate to customers with a disability.
Review Attorney and Agency document provisions for user friendliness.	Legal Counsel, Personal Banking.	31/12/2003	Attorney and Agency documents will be clearly expressed, and in a format that facilitates their understanding and use by people with a disability.

<p>Develop a Signing Deaf Policy for the delivery of financial advisory and other services with the assistance of Auslan (Australian Sign Language) interpreters.</p>	<p>Head of People Capital, Personal Customer Business</p>	<p>30/10/2002</p>	<p>Upon request, and based on the availability of external Auslan interpreter providers, ANZ will deliver financial advisory and other services with the Assistance of Auslan interpreters at no additional cost to the customer.</p>
<p>Include guidance notes on usability and accessibility to ANZ Intranet (Max) developers and publishers. Review and update the guidance notes as required.</p>	<p>Manager, Usability Design, Staff Technologies.</p>	<p>31/12/02 – and thereafter ongoing on a 6 monthly basis.</p>	<p>Material available to staff on ANZ “Max” Intranet sites will be published in such a way as to facilitate access and use by people with a disability.</p>
<p>Develop and produce a brochure providing details of delivery channels available to customers with a disability.</p>	<p>Manger Sponsorship & Community Involvement, Group Marketing.</p>	<p>30/09/2003</p>	<p>ANZ customers with a disability will be aware of products and services that are specifically designed to improve access and usability.</p>
<p>Improve editing and print sizing on brochures and other associated product documentation to make them more user friendly for vision impaired customers.</p>	<p>Manger Sponsorship & Community Involvement, Group Marketing.</p>	<p>30/09/2003</p>	<p>Product documentation and brochures will be printed and published in a format that can be read comfortably by vision-impaired customers.</p>
<p>Include information on Group Regulatory Compliance intranet (Max) specifically dealing with disability services, and ANZ’s obligations under the Disability Discrimination Act. The site will contain general information such as:</p> <ul style="list-style-type: none"> ▪ Guidelines for assisting staff to deal with people with a disability; ▪ Basic information about disabilities; ▪ A copy of ANZ’s customer Disability Discrimination Policy; ▪ Links to ANZ’s 	<p>Manager Regulatory Compliance Policy, Group Regulatory Compliance.</p>	<p>31/12/2002</p>	<p>Staff will have access to a suite of information about dealing with people with a disability, and what ANZ’s policy is on improving access to and usability of products and services, and our inclusive employment practices.</p>

<p>equal opportunity employment policies, and relevant external organisations, such as HREOC;</p> <ul style="list-style-type: none"> ▪ On-line access to ANZ's Disability Action Plan; ▪ Links to related Compliance Awareness Training. 			
<p>Ensure that a copy of ANZ's disability action plan is available on ANZ's intranet (Max) and anz.com in a font that can be easily read by customers and staff with a vision impairment.</p>	<p>Manager Regulatory Compliance, Group Risk Management in conjunction with Risk & Compliance Manager - eCommerce Risk, Group Risk Management.</p>	<p>30/09/2002</p>	<p>Vision impaired customers and staff are able to download and comfortably read a copy of ANZ's Disability Action Plan.</p>
<p>Develop and implement a policy for the provision of statements and product information in alternative formats.</p>	<p>Manager Regulatory Compliance Policy.</p>	<p>30/06/2003</p>	<p>Blind and vision-impaired customers will be able to request copies of statements and product documentation in alternative formats.</p>
<p>Include images of customers and staff with a disability in marketing material.</p>	<p>Manager Sponsorship & Community Involvement, Group Marketing.</p>	<p>30/09/2003</p>	<p>Inclusive marketing material will reinforce the fact that customers and staff with a disability make a valued contribution to the success of ANZ.</p>
<p>Consult with industry bodies to develop a common standard for access to premises, products and services.</p>	<p>Manager Public Policy, Government & Regulatory Affairs.</p>	<p>Ongoing to commence immediately</p>	<p>ANZ will play an active role in working towards common industry standards to enhance accessibility for people with a disability.</p>
<p>Regularly include articles and progress updates on the disability action plan in 'ANZ World' magazine, and on the ANZ intranet (Max).</p>	<p>Editor 'World', Group Communication & Change.</p>	<p>Ongoing</p>	<p>Staff will be kept informed about ANZ initiatives in line with the Disability Action Plan.</p>

2. Access to ANZ property and premises

ANZ Property manages, through partnership agreements, over 2000 properties (branches, offices, residences and ATMs etc) throughout Australia. We aim to provide access to all ANZ premises, whether owned by ANZ or leased. To achieve this, we will establish a Property Access Review Panel, which will take on the role of ensuring that legislative requirements as they relate to property access are met, customer feedback on the accessibility of ANZ premises is reviewed and acted upon where appropriate and that where necessary, adequate budget is allocated to upgrade ANZ premises so as to increase accessibility.

In addition, we will consult disability advocacy groups on the accessibility of ANZ premises, and actively promote ANZ's commitment to accessible premises when we negotiate with lessors, shopping centre management and local authorities.

Action	Responsibility	Desired Completion Date	Target Outcome
Establish a Property Access Advisory Panel to: <ul style="list-style-type: none"> Review and advise on the implementation of legislative requirements; Consider feedback and complaints from people with a disability on access to premises and services; Where necessary, set a budget for work to be carried out to increase accessibility. 	National Property Relationship Manager, Property.	31/12/2002	Property Access Advisory Panel will be established and meeting on a regular basis to ensure that requirements of customers and staff with a disability are met in the design, development and redevelopment of ANZ property and premises.
Consult with disability advocacy groups on the accessibility and usability of premises.	National Property Relationship Manager, Property.	Ongoing - to commence by 31/03/2003	ANZ property group will be aware of access issues relating to specific property and premises. This will then be used in relation to the scheduling and prioritising of works.
Develop a Corporate Property Access Policy.	National Property Relationship Manager, Property.	31/12/02	Development and release of an access policy that takes into account the requirements of the Disability Discrimination Act.

Communicate Access Policies, Practices and Standards to property staff, and ensure that they receive ongoing training.	National Property Relationship Manager, Property.	31/12/02	Property staff will be aware of and comply with policies, practices and standards that are aimed at ensuring customers and staff with a disability access to ANZ property and premises.
Upgrade accommodation standards to achieve compliance with the Disability Discrimination Act, and ensure their implementation in fit-out of new premises and refurbishment of existing premises going forward.	National Property Relationship Manager, Property.	Ongoing – to commence by 30/06/02	Accommodation standards for new and refurbished premises will be upgraded to incorporate the requirements of the Disability Discrimination Act.
Ensure that all new lease and building negotiations consider compliance with ANZ’s obligations under the Disability Discrimination Act.	National Property Relationship Manager, Property.	Ongoing – effective from 30/09/02	Engagement of new property and premises leased and built by ANZ will be in line with compliance obligations under the Disability Discrimination Act.
Liaise with new lessors and Local Authorities to improve access for people with a disability.	National Property Relationship Manager, Property.	Ongoing – effective from 30/09/02	Where appropriate, ANZ will be proactive in ensuring that the requirements of customers and staff with a disability are taken into account by lessors and local authorities.
Communicate to new lessors and shopping centre management (where appropriate) ANZ’s commitment to Disability Discrimination Act requirements.	National Property Relationship Manager, Property.	Ongoing – effective from 30/09/02	Lessors and shopping centre management will be aware of ANZ’s commitment to the requirements of the Disability Discrimination Act.
Develop and implement a works program (to include targeted completion dates) for refurbishment of premises that incorporates appropriate measures to increase accessibility for people with a disability.	National Property Relationship Manager, Property.	Ongoing – to commence from 30/09/2002	Scheduled works program will cover issues of accessibility with people with a disability in mind.

<p>Upgrade standard for Q-matic machines in ANZ branches to enhance their usability by customers with a disability.</p>	<p>National Property Relationship Manager, Property.</p>	<p>Ongoing – to commence from 30/09/2002</p>	<p>New Q-matic machines will be designed to better facilitate their use by customers – for example, Q-matic machines will have both visual and audio prompts, ticket numbers will be printed in a larger font, and ticket colour will be suited to use by vision impaired customers.</p>
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3. Access to ANZ services

ANZ provides solutions to help its customers achieve their financial goals, including managed investments, savings and transaction accounts, online share trading, credit cards and loans for home, personal and car purchases. In addition to our in-branch services, ANZ also offers a range of services to make managing accounts easier, including ANZ Internet Banking, Telephone Banking, Electronic Funds Transfer and Automatic Teller Machines.

As part of our commitment to provide accessible banking services, ANZ offers our Access Basic Account to customers who:

- Have held an ANZ account for 12 months or more; and
- Hold either a Senior's Card number, Pensioner Card, Commonwealth Government Health Card or a Repatriation Card (issued by Veteran's Affairs); and
- Supply ANZ with their Centrelink or Veterans Affairs reference number; and
- Have their benefit or income paid into this account.

ANZ's Access Basic Account requires no minimum monthly account balance, has no monthly account servicing fees, provides 15 free transactions per month (excluding non ANZ ATM transactions), and offers eligible customers access to their funds via ANZ ATMs, EFTPOS, Phone Banking, Internet Banking and ANZ branches.

We see access to our services as a key priority. As such, in addition to providing fee free banking via our Access Basic Account, we will establish a Product/Service Review Advisory Panel, which will advise on legislative requirements for products and services as they relate to customers with a disability, consider feedback from customers with a disability and advise product owners on access to and usability of ANZ products and services.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Establish a Product / Service Review Advisory Panel to: <ul style="list-style-type: none"> • Review and advise on the implementation of legislative requirements; • Consider feedback and complaints from customers with a disability in relation to banking products and services; • Review and advise on the accessibility and usability of banking products and services. 	National Manager, Customer Liaison.	30/06/2003	Product / Service Review Advisory Panel will be established and meeting on a regular basis to ensure that requirements of customers with a disability are met in the development and provision of banking products and services. Advice on accessibility will be provided to product and service owners where required.

Establish a process and checklist for designing new products and services that avoids discriminating against customers with disability.	Manager Regulatory Compliance Policy, Group Risk Management.	31/12/2003	A Disability Discrimination Act product development checklist will be included in the new product risk assessment process to ensure that new products and services are designed in a manner that avoids discriminating against customers with disabilities.
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In addition to developing our own Disability Action Plan, ANZ has worked with the ABA to create industry standards on disability access for e-commerce. The voluntary standards - covering Automated Teller Machines (ATMs); Electronic Funds Transfer at the Point of Sale (EFTPOS); Automated Telephone Banking and Internet Banking - were developed by the ABA following the release of a Human Rights and Equal Opportunity Commission report on access to e-commerce for older Australians and people with disabilities. The standards are available on the ABA's website at <http://www.bankers.asn.au>. ANZ's approach to meeting the requirements of the access standards for e-commerce is detailed below.

a. Internet Banking

ANZ Internet Banking is the convenient online service that helps our customers save time by allowing them to do their banking 24 hours a day, 7 days a week. It lets our customers do all the things they can do via ANZ Phone Banking plus added functionality (including Pay Anyone), with the added advantage of being able to see transactions on screen and print a hard copy receipt for their records.

We aim to make ANZ Internet Banking a useful and accessible tool for customers with a disability, providing them with the ability to easily and conveniently:

- Access balances and transaction history of linked ANZ Accounts
- View ANZ credit card statements and ANZ loan details
- Use 'Pay Anyone' to transfer funds to any individual or business with a bank account at most Australian financial institutions (online registration required)
- Use the cheque reconciliation function to keep track of outstanding cheques
- Access ANZ investments online (online registration required)
- Pay more than 6,000 billers online via BPAY®
- Make five bill payments and five transfers on the one screen.

Additionally, with ANZ Internet Banking you can talk to a Customer Service Consultant 24 hours a day, 7 days a week. Call 133350 and press 0. Hearing or speech impaired customers can utilise the TTY (Telephone Typewriter) service by calling 1300 366 255. We are also working to ensure that customers with a disability who require the assistance of the National Relay Service will be able to contact ANZ and conduct their banking securely via that service.

To ensure that ANZ Internet Banking is accessible to and usable by customers with a disability, we will implement the industry standards as follows.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Implement checklist with a Priority Level of 1 as stipulated in the ABA Industry Standard on Internet Banking.	Risk & Compliance Manager - eCommerce Risk, Group Risk Management.	30/10/2002	Priority Level 1 checkpoints for Internet Banking will be met, including the following: <ul style="list-style-type: none"> ✓ ANZ Internet Banking will meet the requirements of W3C WCAG V1.0 priority 1 checkpoints within 6 months of the release of the ABA Industry Standard; ✓ ANZ Internet Banking will either meet checkpoint 6.3 of the ABA Industry Standard, or conform to US Public Law 508 rule L; ✓ ANZ Internet Banking will meet all 16 W3C WCAG V1.0 checkpoints within 18 months of the release of the ABA Industry Standard.
Where feasible, implement checklist with a Priority Level of 2 as stipulated by W3C and endorsed as an ABA Industry Standard on Internet Banking.	Risk & Compliance Manager - eCommerce Risk, Group Risk Management.	30/10/2003	Feasible priority 2 checkpoints will be met within 18 months of the release of the ABA Industry Standard.
Where feasible, implement checkpoints with a Priority Level of 3 in the ABA Industry Standard on Internet Banking.	Risk & Compliance Manager - eCommerce Risk, Group Risk Management.	30/10/2003	ANZ will work towards meeting priority 3 checkpoints within 18 months of the release of the ABA Industry Standard.

b. Automated Telephone Banking

ANZ Phone Banking offers a convenient and easy way to do your banking 24 hours a day, 7 days a week with the use of a touch phone. By simply following the voice prompts, ANZ Phone Banking can be used to:

- Check account balances and have transactions read to you
- Transfer funds between linked accounts
- Pay over 6,000 bills using BPAY®
- Obtain account and credit card balances, details of last 15 transactions, and amount of interest earned.
- Change your address details if you have recently moved.
- Order statements and new cheque/deposit books.

Plus, with ANZ Phone Banking you can talk to a Customer Service Consultant from 8am to 8pm, Monday to Friday (AEST). Call 131314 and press 0. Hearing or speech impaired customers can utilise the TTY (Telephone Typewriter) service by calling 1300 366 255. We are also working to ensure that customers with a disability who require the assistance of the National Relay Service will be able to contact ANZ and conduct their banking securely via that service.

To ensure that ANZ Phone Banking is accessible to and usable by customers with a disability, we will implement the industry standards as follows.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Implement checkpoints with a Priority Level of 1 as stipulated in the ABA Industry Standard on Automated Telephone Banking.	Manager, Projects and Technology Contact Centre Solutions.	To commence 30/11/2002	Priority Level 1 checkpoints for Automated Telephone Banking will be met, including (but not limited to) the following: <ul style="list-style-type: none"> ✓ ANZ will comply with AS/NZS 4263: 1997/Amdt 1, or the most current version of that standard; ✓ Users who are having difficulty navigating or comprehending the IVR shall be given the option to speak with an ANZ operator in order to carry out their transactions; ✓ Customers who are compelled to use an ANZ operator will not be financially penalised for doing so; ✓ Transaction steps for automated telephone banking will be available on request.
Where feasible, implement checklist of Priority Level 2 as stipulated in the ABA Industry Standard on Automated Telephone Banking.	Manager Projects and Technology, Contact Centre Solutions.	To be completed by 31/10/2003	Feasible priority 2 checkpoints will be met within 18 months of the release of the ABA Industry Standard.
Where feasible, implement checkpoints with a Priority Level of 3 in the ABA Industry Standard on Automated Telephone Banking.	Manager Projects and Technology Contact Centre Solutions.	To be completed by 31/10/2003	ANZ will work towards meeting priority 3 checkpoints within 18 months of the release of the ABA Industry Standard.

Establish a process in conjunction with the National Relay Service so as to facilitate calls with deaf, hearing impaired and speech impaired customers.	Quality & Risk Manager, Contact Centre Solutions.	31/12/2002	Customers with a disability who require the assistance of the National Relay Service will be able to contact ANZ and conduct their banking securely via the NRS.
Ensure that published material clearly displays the TTY telephone number for use by customers with a disability.	Quality & Risk Manager, Contact Centre Solutions in conjunction with Manager Sponsorship & Community Involvement, Group Marketing.	31/12/2002	Customers who choose to use the TTY facilities available will be aware of the appropriate number to call.

c. ANZ EFTPOS & ATMs

ATMs and EFTPOS provide our customers with convenient access to their funds at thousands of locations across Australia and worldwide via the MAESTRO and CIRRUS networks. Customers can obtain cash directly from an ATM or obtain additional cash while making a purchase via EFTPOS. Plus ANZ-branded ATMs can be used to transfer funds between ANZ accounts, make deposits and check account balances. By using ANZ Night and Day ATMs to withdraw cash from ANZ accounts, customers can avoid fees charged for using the ATMs of other banks.

To ensure that ANZ ATMs and EFTPOS devices are accessible to and usable by customers with a disability, we will implement the industry standards as follows.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Implement checkpoints with a Priority Level of 1 as stipulated in the ABA Industry Standard on EFTPOS.	Senior Manager, Acquiring Merchant Payment Solutions & Smartcards.	Ongoing, to commence 30/11/2002	<p>Priority Level 1 checkpoints for EFTPOS Industry Standard will be met, including (but not limited to) the following:</p> <ul style="list-style-type: none"> ✓ Where we are a deployer of EFTPOS terminals, ANZ will endeavour to ensure that the requirements of the Standard are met by retailers; ✓ If necessary, terminals will be movable so as they are in comfortable reach of users; ✓ EFTPOS terminal controls will be operable with one hand, and will not require tight grasping, pinching, or twisting of the wrist;

			<ul style="list-style-type: none"> ✓ Text based operating instructions will be in plain English; ✓ Keypads will conform to the telephone layout convention, with a raised 'pip' on the 5 key.
Where feasible, implement checkpoints with a Priority Level of 2 as stipulated in the ABA Industry Standard on EFTPOS.	Senior Manager, Acquiring Merchant Payment Solutions & Smartcards.	To be completed by 31/10/2003	Feasible priority 2 checkpoints will be met within 18 months of the release of the ABA Industry Standard.
Where feasible, implement checkpoints with a Priority Level of 3 in the ABA Industry Standard on EFTPOS.	Senior Manager, Acquiring Merchant Payment Solutions & Smartcards.	To be completed by 31/10/2003	ANZ will work towards meeting priority 3 checkpoints within 18 months of the release of the ABA Industry Standard.
Implement checkpoints with a Priority Level of 1 as stipulated in the ABA Industry Standard on ATMs.	Strategic Development Manager, ATM Banking.	Ongoing, to commence 30/11/2002	<p>Priority Level 1 checkpoints for ATM Industry Standard will be met, including (but not limited to) those related to:</p> <ul style="list-style-type: none"> ✓ ATM requirements; ✓ Access and location of ATMs; ✓ ATM operation; ✓ ATM display; ✓ Keypads; ✓ Outputs; ✓ Security and Privacy; ✓ Installation, Maintenance and Operating Instructions.
Where feasible, implement checkpoints with a Priority Level of 2 as stipulated in the ABA Industry Standard on ATMs.	Strategic Development Manager, ATM Banking.	To be completed by 31/10/2004	Feasible priority 2 checkpoints will be met within 18 months of the release of the ABA Industry Standard.
Where feasible, implement checkpoints with a Priority Level of 3 in the ABA Industry Standard on ATMs.	Strategic Development Manager, ATM Banking.	To be completed by 31/10/2004	ANZ will work towards meeting priority 3 checkpoints within 18 months of the release of the ABA Industry Standard.

4. Increased staff awareness and better training

ANZ already trains our staff in discrimination and harassment as they relate to people with a disability. To ensure that our staff are in a position to best meet the needs of customers with a disability, and are aware of what constitutes discriminatory behaviour we will be relaunching our discrimination and harassment awareness training, and integrating training related to disability issues in our Qualified to Serve, Qualified to Sell module and eInduction Program for new staff.

Increasing staff awareness of disability issues will not only benefit our customers and the community, it will also benefit existing and potential ANZ staff by reinforcing and enhancing hiring managers' understanding of the valuable contribution staff with a disability can make to ANZ.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Upgrade staff knowledge and skills for dealing with customers with disabilities including their knowledge of products and services available and useful to them.	Manager Regulatory Compliance Policy, Group Risk Management in conjunction with Manager Business Integration & Change, Restoring Customer Faith.	31/12/2003	ANZ staff will be better able to deal with customers with a disability, and be aware of products and services available to suit customers with a disability.
Train staff in Disability Awareness relative to emerging products and services and face-to-face contact.	Manager Regulatory Compliance Policy, Group Risk Management	31/12/2003	Staff will be in a better position to serve customers with a disability and advise on products and services that are designed to enhance access and usability.
Include material on the Disability Discrimination Act in ANZ's eInduction training for new employees.	Manager Regulatory Compliance Policy, Group Risk Management in conjunction with Project Manager, eInduction.	13/12/2003	The eInduction module will include training on disability as it relates to both customers and staff. New staff will be aware of disability issues from the time they commence employment with ANZ.
Ensure Disability Discrimination Act issues are included in ANZ's Qualified to	Manager Regulatory Compliance Policy, Group	31/12/2003	Branch staff will be aware of disability issues, and keep these in mind when serving customers with a disability.

<p>Serve, Qualified to Sell program for branch staff.</p>	<p>Risk Management in conjunction with Manager Business Integration & Change, Restoring Customer Faith.</p>		
<p>Review Discrimination and Harassment compliance awareness module to ensure that it adequately addresses disability issues.</p>	<p>Manager Regulatory Compliance Policy, Group Risk Management in conjunction with Head of Online Learning Services.</p>	<p>31/12/2002 and ongoing</p>	<p>Discrimination and Harassment Compliance Awareness Module will be updated to ensure that disability issues are adequately addressed. Regular reviews will ensure that module content is accurate and up-to-date.</p>
<p>Pilot Diversity@work's "Opening the Door for People with a Disability" program within ANZ, in particular focusing on hiring managers so as to provide improved employment opportunities to people with a disability.</p>	<p>HR Adviser, Breakout and Cultural Change.</p>	<p>31/12/2002</p>	<p>The program will assist staff within ANZ (including hiring managers) to better understand different types of disabilities and the principles of the Disability Discrimination Act, as well as develop the skills and knowledge needed to access the advantages of workers with a disability.</p>

5. Fostering a diverse and inclusive workplace

ANZ prides itself on being an employer of choice, and designs and implements initiatives that ensure our organisational demographics reflect those of the greater community and that employee differences are valued and utilised. The action items we have developed in relation to fostering a diverse and inclusive are aimed at improving on the strong foundation we have built.

In addition, we are actively seeking to become involved in development and placement programs for people with a disability. In doing so, we will be working with expert consultants and advocacy groups to identify high calibre people with a disability who will contribute to the diversity of our workplace.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Review ANZ's Equal Opportunity Employment Policy and Diversity Charter for compliance with the underlying principles of the Disability Discrimination Act.	Snr Consultant, Workplace Relationships in conjunction with Project Manager Diversity, Breakout & Cultural Transformation	31/04/2003	ANZ's Equal Opportunity Policy will be reviewed and updated where necessary to ensure that it is inclusive of people with a disability, and compliant with the underlying principles of the Disability Discrimination Act.
Promulgate Equal Opportunity Employment Policy and relevant information on Diversity and our Diversity Charter to ANZ staff.	Snr Consultant, Workplace Relationships in conjunction with Project Manager Diversity, Breakout & Cultural Transformation	31/04/2003	Review and update of ANZ's intranet (Max) Diversity site to ensure that Equal Opportunity Policy is made known to all ANZ staff.
Ensure that all ANZ staff have completed Discrimination and Harassment awareness training.	Manager Regulatory Compliance Policy, Group Risk Management.	80% of staff to have completed by 31/12/2002, 95% to have completed by 31/12/2004	All ANZ staff will be aware of the requirements of the Disability Discrimination Act and ANZ's workplace policies on disability, inclusiveness and discrimination and harassment as they relate to both customers and staff.
Develop and foster a strong relationship with Diversity@Work and similar organisations to provide employment opportunities and	Project Manager Diversity, Breakout & Cultural Transformation	Ongoing	ANZ will be an employer of choice for people with a disability on the basis of our inclusive workplace culture and disability friendly policies and initiatives.

access to people with disabilities, and be recognised as a Disability Friendly organisation.			
Regularly include disability employment program success stories in 'ANZ World' magazine, and on the ANZ intranet (Max).	Editor 'World', Group Communication & Change.	Ongoing	Staff will be kept informed about ANZ's disability in employment initiatives in line with the Disability Action Plan.
Ensure that issues of disability in employment are regularly considered by ANZ's Diversity Council.	Project Manager Diversity, Breakout & Cultural Transformation	Ongoing	The Diversity Council will actively consider and promote disability issues in our workplace.

Measuring the effectiveness of our Disability Action Plan

To make sure that we are meeting our aim of providing equal access to all ANZ properties, products, services and information, and creating a work culture and environment where employee differences are valued, we have put in place a rigorous process for measuring the effectiveness of our Disability Action Plan.

The ongoing effectiveness of our action plan will be determined in two ways. First, we will review our progress to target outcomes and desired implementation dates on a yearly basis. Secondly, via the Property and Product/Service Advisory Panels and the Disability Steering Committee we will review feedback provided by customers and employees with a disability, community groups and the Human Rights and Equal Opportunity Commission on the effectiveness of ANZ's attempts to meet the overall aim of our Action Plan.

Action Item	Responsibility	Desired Completion Date	Target Outcome
Co-ordinate the monitoring process for implementation of the Disability Action Plan, including use of the specification checklists relating to ABA Industry Standards.	Manager, Regulatory Compliance Policy, Group Risk Management in conjunction with impacted Business Units.	Ongoing – review to be undertaken every 12 months	Regular reviews against plan will take place to ensure the action items included in the Action Plan are implemented within the desired timeframes.
Develop and maintain a register of issues and concerns brought to the Bank's attention by customers with disabilities.	National Manager, Customer Liaison.	Ongoing – register to be in place by July 2003	By maintaining a register of issues and concerns, ANZ will be in a better position to provide people with a disability access to products, services and employment opportunities, and to enhance the usability of products and services going forward.
Consult with HREOC, ABA and interest groups to ensure ANZ products, services and employment are accessible to people with disabilities.	Head of Government and Regulatory Affairs.	Ongoing – will be based on 12 monthly review	ANZ will take a proactive position in ensuring accessibility and usability of its products, and ensure that employment policies and practices are inclusive of people with a disability.
Update Action Plan to overcome inadequacies or ambiguities identified during implementation, or on the basis of feedback from HREOC, ABA and interested community groups & individuals.	Manager, Regulatory Compliance Policy, Group Risk Management & Disability Action Plan Steering Committee.	Ongoing – will be based on 12 monthly review	ANZ's Disability Action Plan will be updated and amended as required to ensure that action items are appropriate and achieve the aim of increasing accessibility and usability of ANZ products, services and employment opportunities.

Definitions

Accessible	meeting the functional needs of all people to the greatest extent possible
ANZ	Australia and New Zealand Banking Group Limited ABN 11 005 357 522
ABA	Australian Bankers Association
ATM	Automatic Teller Machine
Auslan	Australian Sign Language
DDA	<i>Disability Discrimination Act 1992 (Commonwealth)</i>
DAP	ANZ's Disability Action Plan
EFTPOS	Electronic Funds Transfer at Point of Sale
HREOC	Human Rights and Equal Opportunity Commission
NRS	National Relay Service
TTY	Telephone Typewriter – a device attached to a telephone line which allows callers to communicate by typing messages which are instantly seen by the person at the other end of the line
Usable	able to be used by all people to the greatest extent possible

Complaints

We have worked hard to develop a comprehensive Disability Action Plan, and would welcome your feedback on it. If you have questions or comments related to the Action Plan, please don't hesitate to contact us.

- **Talk to us**

If you have a complaint to make in relation to the Action Plan, talk to us. Our staff will treat your concern as their own and our aim is to resolve the matter at your first point of contact. So if you have any complaints or issues, talk to the staff at your local branch or service centre. You also have the right to speak to your branch manager.

- **National Customer Liaison**

If above contacts do not resolve your complaint to your satisfaction you should contact National Customer Liaison. If your branch manager has been unable to help you or you are not comfortable discussing the issue with our staff or the Manager, you can call our complaints team at National Customer Liaison on **1800 805 154**. Hearing or speech impaired customers can also utilise the TTY service by calling **1300 366 255**.

- **ANZ Customer Advocate**

If your complaint is not resolved to your satisfaction after these contacts, you can have your complaint objectively reviewed by ANZ's Customer Advocate. Contact the Advocate on **03 9273 6523**.

- **Australian Banking Industry Ombudsman**

The Ombudsman is an independent arbitrator who helps customers resolve concerns and disputes with their bank. You can contact the Ombudsman on **1800 337 444** or **03 9613 7333**, or visit the Ombudsman's website at <http://www.abio.org.au>.

- **Human Rights and Equal Opportunity Commission**

HREOC The Human Rights and Equal Opportunity Commission (HREOC) is a national organisation established by the Australian Parliament in 1986 to administer federal laws relating to discrimination and human rights infringements. It is an independent national organisation that investigates and conciliates complaints of discrimination and human rights breaches. The Commission acts in an impartial manner and does not act for either party to a complaint. While HREOC is based in Sydney, it handles complaints from all over Australia in an accessible, professional and timely manner. Contact HREOC's Complaints Infoline on **1300 656 419**, or TTY **1800 620 241**. You can also visit the HREOC website at <http://www.humanrights.gov.au>.