

Australia and New Zealand Banking Group Limited (ANZ)

**NATIONAL MENTAL HEALTH AND
DISABILITY EMPLOYMENT STRATEGY
SUBMISSION JUNE 2008**



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1. Introduction

ANZ welcomes the opportunity to participate in the consultation to develop a National Mental Health and Disability Employment Strategy.

ANZ's Group Diversity strategy recognises that a diverse and inclusive workforce is a strategic asset for ANZ and essential to achieving our growth objectives. The strategy focuses on gender, cultural background, age, disability and sexual orientation.

ANZ's experience is that strong leadership from the employer is crucial to improving the opportunities and workplace conditions for employees with a disability. This includes improving awareness and increasing understanding among employees of the barriers, and providing the right support not only for employees with a disability, but their managers and co-workers.

We also believe a comprehensive Australian business case for employing people with a disability is required and ANZ is contributing to the work being done on this by the Australian Employers Network on Disability (AENOD).

We have made some progress in improving inclusion of people with disabilities, though at a slower pace than in other areas of our diversity strategy. We acknowledge more action is required to recruit, retain and include people with disabilities.

In developing our submission, we conducted a survey in May 2008 to gather views from our employees with disabilities and their managers about their experiences. We have incorporated some of their insights throughout our submission. Verbatim quotes from this survey and our bi-annual Diversity census are provided *in italics* throughout this document.

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2. Key issues for Government consideration from ANZ's perspective

Increasing the number of people with a disability in the workforce will require a joint response from Government, business and the not-for-profit sectors. ANZ believes that the following initiatives would have the biggest impact on the National Mental Health and Disability Employment Strategy.

2.1 Advice and Awareness

A national agency for disability employment

We would support the establishment of a national agency or organisation to work with business to provide a "one stop shop" for disability employment information and education and provide recruitment and support advice and services for employers and employees with disabilities.

Our people have told us the following about recruitment:

- *You can only register with one employment agency that is specialised in finding jobs for people with disabilities, when able bods can register in several.*
- *ANZ, like other recruitment schemes (e.g. indigenous recruitment, graduates etc.), should have a specific recruitment scheme for those with disability.*
- *Service providers need to take our goals seriously for diversity and recruiting people with a disability. Organisationally we could establish formal partnerships with organisations like Vision Australia to make this happen.*
- *The problem is most providers are very specific in who they help and there are a lot of people missing out on assistance because there is not specific provider or no funding to assist*

ANZ's relationship with Reconciliation Australia and the Aboriginal Employment Strategy (AES), together with DEEWYA advice and financial support via the STEP program, has enabled ANZ to implement its Indigenous employment program. This employment program was implemented as a result of ANZ signing the Federal Government *Corporate Leaders for Indigenous Employment (CLIEP)* agreement in February 2006. The Equal Opportunity for Women in the Workplace Agency program has performed a similar role over a longer period to improve employment opportunities and standards for women.

National awareness and education campaign

A national awareness and education campaign could address unconscious biases against workers with disabilities and celebrate and share details of employment success stories. This campaign would also include a comprehensive business case detailing the business benefits of a diverse workforce.

Our people have described the stigma associated with disabilities and mental illness:

- *many people with a mental disability will not 'come out', as there is still a huge stigma attached to it. Awareness and education are the key factors in overcoming such a problem, but we, as a society, are still a very long way behind in this.*
- *(there is a) stigma attached to depression and the immediate assumption is that one is 'fragile' or 'not to be trusted'*
- *an Australia-wide advertising campaign, education for corporations and small business owners is needed,*
- *funding to help to reduce the stigma surrounding mental illness in the workplace, to provide education to peers and management.*

2.2 Support for Employees and Employers

Disability traineeship program

A pilot disability traineeship program similar to other employment schemes for disadvantaged groups could facilitate increased employment outcomes.

ANZ has worked successfully with an indigenous provider (AES) and the DEEWYA Aboriginal Employment Scheme to provide traineeships in our branch network for Indigenous youth with 88% being recruited into employment with ANZ post traineeship

A National Disability Standard

A National Disability Standard or Action Plan program could encourage private sector engagement and leadership.

In the UK, for example, 116 organisations took part in the Disability Standard 2007, between them employing around 2 million people with disabilities. In Australia, the CLIEP agreement and more recently the Reconciliation Action Plan program has resulted in major corporations, including ANZ, working to improve employment opportunities for Indigenous Australians.

2.3 Recognising and rewarding excellence

The Government plays an important role in recognising and sharing best practice employer success stories by introducing and/or leveraging high profile recognition programs for corporate/community initiatives and programs that encourage greater workforce participation. For example the **Prime Minister's Award** for Employers of People with disabilities which recognise excellence in the employment of people with disability could be updated to focus on business leaders and showcase best practice to inspire action.

Such programs can encourage and inspire organisations to innovate and lead the way on issues facing business and society.

Our people have suggested:

- *Holding up and recognising the efforts of organisations that make a concerted effort to support and employ people with disabilities.*
- *Offer greater incentives to employers who champion accessibility.*

These are the key initiatives that ANZ believes would impact the external environment to provide greater employment opportunities for people with disabilities and/or mental illness.

3. ANZ approach to improving employment and inclusion of people with disabilities and/or mental illness

ANZ's Group Diversity strategy recognises that a diverse and inclusive workforce will be a strategic asset for the Group and essential to achieving our growth objectives. The strategy focuses on gender, cultural background, age, disability and sexual orientation.

We have made some progress in improving inclusion of people with disabilities, though at a slower pace than in other areas of our diversity strategy.

We acknowledge more action is required to recruit, retain and include people with disabilities. From our 2007 internal diversity Census called "My Difference Census" we know that 3% of ANZ employees in Australia identify with having a disability.

However, the number of employees with a disability who agree they are able to use their experience of disability to enhance their contribution to ANZ signals to us that there is work to be done in this area, as does the fact that our employees with a disability feel less included in their workplace compared to other groups of employees

To assist ANZ in becoming a more inclusive employer for people with disabilities we have identified some key issues/barriers and have put in place measures and initiatives to work through them

Importantly, ANZ's experience is that strong leadership is crucial to improving the opportunities and workplace conditions for employees with a disability. This includes improving awareness and understanding among employees, building organisational capability and governance to successfully implement ANZ's initiatives and providing the right support not only for employees with a disability, but their managers and co-workers.

3.1 Governance

ANZ launched its first Disability Action Plan (DAP) in 2005. Despite some success, it did not get the level of support within the organisation required. At the time, ANZ focused on improving employment processes, awareness and understanding amongst HR managers and recruitment companies, rather than business leaders and line managers.

Learning from this, a governance structure was established with the development and launch of the second DAP in 2007. In addition to governance, the other areas of focus included ANZ policies and practices, and organisational capability including awareness and training. As a result, significant improvements have been achieved in a relatively short period of time.

3.1.1 Disability Action Plan

ANZ's DAP incorporates 23 specific commitments to improve our business practices, and support the inclusion of people with disabilities – including our employees, our customers and the broader community.

3.2.2 Disability Action Plan Steering Committee

Responsibility for implementing the plan lies with the Disability Action Plan Steering Committee which is lead by John Harries, ANZ's Managing Director of Consumer Finance, and consists of a group of senior managers and executives from across ANZ who have responsibility for major business units, policy and program development.

3.2.3 Measurement and Targets

ANZ is measuring its success in creating and implementing inclusive workplace conditions for employees with a disability:

- DAP initiatives are tracked on an ongoing basis to ensure the commitments and timelines are met and reported back to the DAP Steering Committee.
- ANZ has set itself internal targets for the employment of people with disabilities. In 2007/08 ANZ set its first internal disability employment targets to recruit three people with a disability as part of our graduate recruitment program. Experience with our Indigenous employment strategy (now with a target of 100 trainees annually) has taught us that starting small and getting the model right is crucial to sustainable success.

- ANZ is also investigating how it can better capture information on staff with a disability. All information will be completely voluntary and will only be used to help us better support our employees, serve our customers and deliver improved services.
- In 2008/09 we will introduce internal employment targets as part of our Diversity scorecard for employing people with disabilities across our Australian business.
- In November 2007 ANZ conducted its bi-annual diversity census called "*My Difference*" which is our main source of diversity data. In this, 3% of ANZ employees in Australia identify as having a disability (29% - sensory, 31% - physical, 35% - mental/psychiatric, 8% - neurological, and 5% - learning/intellectual)
- The effectiveness of ANZ policies are measured through surveys and various HR metrics. These include:
 - ANZ's Engagement and Culture Survey
 - *My Difference* Census
 - *My Flexibility* Survey

4. Policies and Practices

ANZ has introduced a number of strategies, policies, practices and initiatives to facilitate the employment, retention and development of people with a disability and/or mental health issue. Enabling our people to access a range of policies plays an important role in helping us to achieve our business performance objectives.

4.1 Property

ANZ's Property team works to ensure that all new ANZ workplace environments are designed in compliance with the latest Disability Discrimination Act (DDA) requirements: Access, egress, amenities, surfaces, controls.

We achieve this during the design phase of any fit-out or refurbishment when the designers engaged by ANZ apply design principles that comply with the latest Building Code of Australia (BCA) and DDA requirements.

Proposed floor plans are then reviewed by a specialist DDA Consultant who will advise ANZ on whether or not DDA-specific matters have been addressed adequately, and if not, will advise on how best to improve the design.

ANZ Occupational Health and Safety (OHS) Consultants also review the design with regard to accessibility issues and any recommendations are incorporated into the design to ensure ANZ provides a work environment that is fully compliant wherever possible.

When ANZ considers new buildings for lease or purchase, the premises are evaluated using a DDA Checklist which contains mandatory (legislative) and voluntary provisions.

Group Property also monitor changes in Building Code of Australia (BCA) and DDA legislation, as some changes may require retrospective upgrades to our buildings depending on the nature of the amendments.

In some instances, ANZ may consider voluntary provisions by designing work environments that not only meet but exceed the deemed-to-satisfy requirements under the current code.

4.2 Reasonable Accommodation Policy

Reasonable accommodation is the appropriate provision of specialised equipment or accommodations to enable employees with a disability to work more effectively and enjoy equal opportunity with others. This includes ANZ properties, products, services information and employment opportunities. Examples of reasonable accommodations include arranging assistance in the recruitment process, modifications of facilities or work area to improve physical accessibility, or providing additional equipment or facilities such as screen reader software. AENOD data shows that the actual average cost an employer incurs for Reasonable Accommodation is \$500.

4.3 Technology Accessibility Policy

ANZ is committed to ensuring our technology systems are accessible to everyone and non-discriminatory - whether it is our ATMs, Internet Banking or our intranet for employees.

The Technology Accessibility Policy helps us achieve this as well as ensuring we are compliant with the Disability Discrimination Act. This policy outlines a set of accessible design standards for web content, personal computers and desktop applications. This means improved accessibility of information and communication for employees with disabilities. Any new initiatives where there are impacts to customer or staff systems will be required to include these standards as part of the planning process.

Examples of accessibility enhancements delivered within Technology include:

- Installing 1700 audio-enabled ATMs, allowing ATM users to listen to an audio translation of information as it appears on the screen
- Audio enabling branch ticketing machines
- Integrating best practice standards and guidelines into the development of anz.com, Internet Banking and all new services
- Significant work has also been carried out to ensure that all new online compliance training modules for staff are accessible.

ANZ invested \$8000 on a 5 user enterprise licence for the screen reader Jaws so that all the operators that used a screen reader had the latest version as previously they were all using older versions of Jaws and not

necessarily the same version. Also one copy of the screen magnification program Magic was purchased.

Some of the other tools we use include:

- LCD monitor - Adjustable height and tilt for your viewing comfort
- Magnification dial - Adjust magnification from 3 times up to 82 times the actual size
- Colour Panel - Simple, accessible controls for colour selection and brightness
- Position Locator Beam - Easily guides you to exact document placement
- Reading Table - Generous size, with fingertip control and wide side-to-side motion
- Magic Screen Magnification software
- Open book scanning software
- Talks screen reader for mobile phones

4.4 Flexible work practices

ANZ is committed to increasing our people's access to flexible work arrangements so this becomes the way we work, rather than the exception.

Flexible working arrangements are central to ANZ people being able to fully contribute and achieve their best in the workplace. It also makes business sense by helping ANZ attract and retain the best talent in the market.

The ANZ My Difference census identified that 52 per cent of ANZ people benefited from flexible working arrangements. As a result of these findings, we launched *My Flexibility* to further promote employee access to our wide range of flexible working and leave arrangements.

My Flexibility encourages employees and their managers to explore how flexible working arrangements can help people achieve their personal and career goals, while ensuring team and business needs continue to be met.

Options include flexible hours including flexible start and finish times, job sharing, telecommuting, 12 weeks paid parental leave, part time work, child care, career extension for people aged 55 and above and carer's, lifestyle and study leave.

These options are particularly valued by carers and employees with disabilities as they provide flexibility to attend specialist appointments when required.

One employee said:

- *Being able to work from home from time to time is very beneficial. I have a supportive manager who knows that my work quality and output is not diminished due to disability. This support means I can put in 110% to my work as I know it is appreciated*

4.5 Mental Health Strategy

ANZ has established a three-year Mental Health Strategy (2007-2010), including education booklets for all staff and their families and practical workshops for Human Resources and line managers working with people with disabilities and/or mental illness.

4.6 Employee Assistance Program

The Employee Assistance Program (EAP) provides a service for ANZ staff and managers to seek professional, confidential counselling on any work related or non-work related matter. The EAP is readily accessible to all ANZ employees with program providers located in each Australian state and throughout New Zealand.

5. Capability

5.1 Manager and employee awareness and education

Our recent survey conducted to inform this submission told us that 45% of people with disabilities who responded said that having a supportive line manager was the most important factor in them finding and staying in work and developing their careers. This support generally comes from understanding and awareness. According to our My Difference Census, 88% of employees with a disability are comfortable discussing their disability with their line manager representing a 17% increase since ANZ established its Disability Network and implemented our second Disability Action Plan (DAP).

Our people described the importance of supportive line managers:

- *Very understanding Line Managers who have compassion and understanding - flexible with work hours and not seeing my disability as a hindrance to my quality of work.*
- *Support and openness from Line Managers has helped me immensely, both emotionally and practically*
- *I developed a disability 15 years ago while working for ANZ and have always let my different line managers know of my condition. Over that time, the understanding and flexibility consistently shown by management has allowed me to balance and manage my condition and*

worklife the way I want to, with no pressure. Perhaps if I hadn't had this level of support over such a long period of time I might not be still working here

- *I found having a supportive manager very helpful, being able to talk through issues in a non judgmental environment is very important.*

However, a lack of understanding or awareness of diversity can result in fear of employing people with a disability and/or mental illness. Our survey told us that 29% of people with a disability believe that people's lack of awareness and pre-conceptions about disability make it difficult for them to find and stay in work. Of that group, 36% agreed that increased understanding from management through disability training would assist in finding and staying in work.

The combined responses from managers and carers of those with a disability showed that 91% agree that a lack of understanding is a barrier to recruiting, retaining and assisting in career development.

As a result, ANZ has and continues to focus on awareness training and other management tools.

Our people told us understanding is a key barrier to employment success:

- *Training managers to recognise mental stress and depression would mean they could be aware of the need to provide more support during bad periods*
- *Misunderstanding what I can and can't do is the most common. The belief that I am not capable because I have a mental illness - it is manageable - it doesn't stop me from performing my job. Sometimes I might just need more balance between work demands and life demands.*
- *Greater awareness surrounding disability for managers. Training in this area for managers should be mandatory regardless of whether or not you manage someone with a disability.*
- *The greatest barrier - fear and unease surrounding dealing with someone who has a disability. Encouraging managers to use recruitment agencies that specialise in disability to find temps/perm hires.*
- *The main barrier is perception of disability. Most people don't have a full understanding of what forms disability comes in. The least understood disability is perhaps the learning and mental kind.*
- *Prejudice, pre-conception regarding a person's condition (mental/psychiatric illness) and their ability to perform their role in a workplace*

5.1.1 The Reasonable Accommodation Kit

Employers perceive they will have a higher health and safety exposure by employing a person with a disability. Employers are also concerned about the costs associated with providing accessible facilities and working environments for people with disabilities, although AENOD data shows that the actual average cost an employer incurs for a Reasonable Accommodation is \$500.

Managers have voiced the following concerns:

- *I would like to see a central funding pool that I can draw on with discretion to fast track technology accessibility issues that come to our attention.*
- *We have found that after identification of these issues it is very difficult to get business units to fund the fixes.*

To provide ANZ managers with access to resources about disability, managing staff with disability, and the appropriate provision of reasonable accommodations, the Reasonable Accommodation Kit was developed. It also directs managers to all existing disability resources within ANZ along with relevant external resources. It covers:

- Defining Disability
- The Disability Discrimination Act 1992
- Working With People Who Have Disability
- Reasonable Accommodation
- Resources, Links and Glossary

5.1.2 ANZ's Mental Health Strategy

To educate and inform managers, an online awareness program was developed using case studies and practical workshops. Initiatives include:

- Global release of 'Creating a Supportive Workplace' booklet and Intranet information, containing regional statistics and resource information
- World Mental Health Day and Mental Health Week activities
- On-line awareness program using case studies

5.1.3 Practical workshops for ANZ managers and HR community

A number of other tools are available to raise awareness concerning employing people with disabilities:

- *Diversity Challenge* – The diversity 'game' represents a unique way to raise diversity awareness amongst employees. Employees are challenged to explore their knowledge base and attitudes towards diversity issues and to determine how diversity and equity scenarios, which typically arise in the workplace, should best be handled.
- *Flexibility walk* – This is a tool designed to improve the awareness and acceptance of diversity and challenge unconscious biases by participants taking on a different identity. For example the disability

identities include “You are a full-time employee with a visual impairment” and “You are a part-time employee with a physical disability. You require a wheel chair”. It creates a safe environment in which people can identify and explore their personal assumptions about flexibility in the workplace.

- ANZ has recently piloted a new one day global diversity awareness program called *Breakout Inclusion*, to challenge assumptions, expand mindsets and identify the behaviour change required from individuals, teams and businesses to deliver an inclusive organisation. It provides the compelling business case for diversity at ANZ and participants explore actions that can be taken to enable all ANZ voices to be heard so that we can effectively utilise our diversity for business benefit. Plans are underway to roll out the intervention to the wider group at ANZ in late 2008.

5.1.4 Specific brochures and products for staff and customers

To provide awareness tools as part of our responsibility to the broader community, ANZ has:

- Launched an information booklet called “Welcoming Customers with a Disability” - distributed to all customer facing employees across Australia (developed in partnership with McDonalds and the Australian Employers Network on Disability (AENOD),
- Made nine of our most commonly used product documents available to our customers in Braille, large prints and audio CD format (with support from Vision Australia)
- Adapted ANZ’s online MoneyMinded financial literacy courses to be accessible for employees, customers and members of the community with vision impairment

5.2 Recruitment Process

A lack of awareness and understanding among some line managers and recruiters can result in unconscious bias getting in the way of effective recruitment, support for and valuing of people with disabilities.

One employee suggested:

- *It would be great if ANZ Careers were able to have a more diverse range of recruitment providers on their panel - e.g. charity organisations that assist low income/disadvantaged or disability recruiters*

Potential employees coming through mainstream recruitment agencies may not disclose a disability (and are not required to under Privacy Laws) making proactive recruitment strategies difficult.

In addition, people with disabilities can only register with one agency limiting the pool of available candidates from selected service providers.

There is a plethora of service providers corporations must engage with in order to successfully recruit and retain people with disabilities, making it

difficult to partner with one national provider – a preferred option for large employers.

There is no “one stop shop”, providing easy to access information for employers to help develop the business case for employing people with a disability and implementing effective employment strategies.

To combat some of these barriers, ANZ Careers has a specific Disability Action Plan focussing on providing an inclusive recruitment process.

Key areas include:

(a) Training of ANZ Careers staff in recruiting individuals with disability and across diversity to:

- educate ANZ Careers staff about best practice concerning candidates across disability and diversity to recruit diverse candidates
- understand explicit and implicit barriers to employment for people with disabilities
- deliver a positive recruitment experience for candidates (measured by feedback)
- consider challenges for individuals that can seem initial obstacles but are mostly able to be accommodated, i.e. flexibility of hours, equipment, accessibility, transport, suitability of assessment method
- increase consulting capability of ANZ Careers consultants when working with hiring managers to discuss with confidence suitability of candidates matched to role, particular adjustments, periods of absence in work history etc.

(b) Monitoring and recording of applicants with disability to:

- enhance our ability to record numbers of applicants with disability and track individual progress throughout the recruitment process
- enhance ANZ Careers ability to target areas of the wider recruitment market
- allow ANZ to benchmark against other organisations in the attraction of staff
- give insight into roles, business units and gradings of roles applied to and success across the whole recruitment process. This will be valuable in knowing whether we attract applicants who have a disability but are less successful in converting to short-listed candidates or hires.

(c) Partnering with key Disability Employment Network (DEN) providers to supply a pool of applicants with disability to:

- provide ANZ with a pool of applicants already qualified as 'work ready' to match to roles
- provide ANZ with the ability to place itself close to the established DEN network
- provide ANZ with the ability to market itself as an employer of choice

Key measurements are the increase of applicants and an increase in the number of applicants successfully hired

(d) Auditing assessment and selection processes to:

- allow us the confidence to assess to best practice in this area
- highlight any barriers to employment within the selection practices employed and give suggestions to other alternative methods should this be necessary
- consider facilities and technology across ANZ Careers assessment facilities

5.3 Engagement and empowerment

ANZ has developed a “top-down, bottom-up” approach to increasing employment opportunities for people with disabilities and/or mental illness.

Feedback from our employees with disabilities reveals a desire for more opportunities to use their experience to contribute to ANZ, and the products and services we provide our customers.

To assist with this, in 2005, the **ANZ Disability Employee Network** was established to support ANZ employees with a disability. This network, an initiative of one of our employees with vision impairment, is funded by the ANZ Diversity Council. It meets regularly in Melbourne, with people joining via teleconference from around Australia and has been effective in supporting employees with a disability, and recommending employee and customer policy changes, for example:

- organised and ran Disability Awareness Week in December 06 and 07 to coincide with International Day of People with Disability. The success of this initiative is due to the large number of volunteer staff members and managers who dedicate significant time and energy to this event.
- developed a DVD called “Reach Out” to raise awareness by telling the stories of ANZ employees with disabilities. This DVD was launched at the 2007 Disability Awareness week and is available for viewing on ANZ’s intranet
- contributed to the ANZ Reasonable Accommodation policy and kit. This kit is an accessible reference guide to help managers and employees ensure that staff members with a disability have equitable access to ANZ properties, products, services, information and employment.
- contributed to the 2007 ANZ Disability Action Plan (DAP). Members shared their personal experiences of working at ANZ and some of the opportunities for improving the new Plan.

- provided input on accessible Internet Banking authentication techniques, and the accessibility of online compliance training courses for ANZ staff, and several members were involved in the design and testing of a new feature that allows ATM users to listen to an audio translation.
- currently working with ANZ's property function in the design of the new ANZ building being constructed at 833 Collins St, Melbourne to ensure all aspects of accessibility are considered.

6. Closing Comments

ANZ appreciates the opportunity to contribute ideas and insights for Government consideration to the National Health and Disability Strategy to improve the employment of people with disabilities and/or mental illness. We have done this through sharing our views as to what would assist external to our organisation, and by providing some insights as to what ANZ has put in place internally.