

Medibank Accessibility and Inclusion Plan

2022 – 2024

Interim Progress Report
May 2022 to April 2023



Acknowledgment of Country

Medibank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We proudly recognise Elders past, present and emerging as the Traditional Owners and Custodians of the lands on which we work and live. We're committed to supporting self-determination and envision a future where all Australians embrace Aboriginal and Torres Strait Islander histories, cultures and rights as a central part of our national identity.

Special thanks

The Medibank Accessibility and Inclusion Plan features an original design by Emily Crockford titled 'Patterns of the Loveheart Mandala.'

About the artist

Emily Crockford's broad creative practice encompasses painting, textiles and soft sculpture. Her work can be seen in large scale across Sydney and in high profile institutions. Emily was the recipient of the 2020 Australia Council National Arts and Disability Award for an Emerging Artist. Emily is an artist with Studio A, a supported studio based in Sydney that tackles the barriers that artists living with intellectual disability face in accessing conventional education, professional development pathways and opportunities needed to be successful and renowned visual artists.

studio A

Design

Marcus Lee Design, a creative agency certified by Supply Nation.



Creating an inclusive, safe and disability confident workplace

Medibank is an employer of choice for people with disability, those with accessibility adjustments and carers of people with disability or chronic illness. Medibank is a place where people can bring their whole selves to work and where diversity is respected and celebrated, because it's the way we do things here.

Commitment	Deliverables	Status	Timeline	Progress
Medibank will strive for a truly inclusive workplace where our people feel safe to disclose and are empowered to succeed.	1. Actively engage employees with disability to undertake a review of their employment journeys to identify and remove barriers for people with an accessibility adjustment or disability.	Achieved	December 2022	As part of a broader review of our employee journeys, a new framework was developed that covered 'moments that matter,' for our people. This framework was informed by specific feedback from employees with an accessibility adjustment or disability via our employee engagement survey. The next step in the project is to engage with the refreshed 'EMPOWER Network,' of employees with disability and Neurodiversity Employee Network, to identify areas of priority in their employment journeys and key initiatives that focus on removing accessibility barriers.
	2. Develop inclusive language and communication guidelines to be utilised for employee communications and recruitment processes.	Not yet due	June 2023	Progress to be updated in subsequent reports.
	3. Continue to review and update all new learning content, including compliance training, against externally benchmarked standards where applicable (WCAG 2.2 AA).	On track	Ongoing	The Learning & Development team attended several accessible design workshops across September and October 2022 delivered by Intopia. Before launching each new online module, the Learning team now complete an accessible design checklist as standard process and are currently being assessed on a compliance module by Get Skilled Access against WCAG standards.
	4. Continue to review and update all new intranet content and internal communications against externally benchmarked standards where applicable (WCAG 2.2 AA).	On track	Ongoing	Medibank's Employee Experience team has established a process to review and update all new intranet content and internal communications against externally benchmarked standards. This review process continues to be applied across the intranet.
	5. Provide opportunities for employees with disability exiting Medibank to share feedback on their employee experience.	On track	Ongoing	Employees with disability can now self-identify through the exit interview process and share feedback on their experience.
	6. Refresh employee onboarding welcome packs to visually showcase Medibank's appreciation for diversity and inclusion, including disability.	Achieved	December 2022	In August 2022, Medibank refreshed its onboarding welcome packs for all new employees and our commitment to accessibility and inclusion was a key focus in the development of the new packs. This included a notebook with our AIP artwork by Emily Crockford and its story, key focus areas of accessibility at Medibank and the strong link between our AIP commitments and our 2030 vision.

Creating an inclusive, safe and disability confident workplace

Commitment	Deliverables	Status	Timeline	Progress
<p>Medibank will strive for a truly inclusive workplace where our people feel safe to disclose and are empowered to succeed.</p> <p>(Continued)</p>	<p>7. Ensure all senior executives demonstrate a commitment to workplace inclusion, through:</p> <p>a. Including actions linked directly to relevant accessibility actions as part of their Big Goals; and</p> <p>b. Implementing measures for their team to include relevant accessibility actions as part of their Big Goals.</p>	Achieved	August 2022	All senior executives and their direct reports utilise a Big Goals framework for setting and reporting on annual performance. A specific commitment to contribute to our Diversity & Inclusion priorities, including accessibility, is now embedded into this framework for all employees, including senior executives and their direct reports.
<p>Medibank will celebrate all abilities and provide a mechanism for people with accessibility requirements to connect and provide support.</p>	<p>8. Refresh and promote our employee-led, peer support network for people with disability 'EMPOWER.'</p>	Past deadline but on track	December 2022	Medibank's EMPOWER Network of employees with disability was promoted and refreshed as part of a whole-of-organisation refresh of Diversity & Inclusion employee networks in April – May 2023.
	<p>9. Support our EMPOWER Network to establish a Terms of Reference.</p>	Not yet due	June 2023	Progress to be updated in subsequent reports.
	<p>10. Develop a Network approved consultation mechanism to consult EMPOWER on access and inclusion related matters.</p>	Not yet due	June 2023	Progress to be updated in subsequent reports.
	<p>11. Support events and activities relating to people with disability, including International Day of People with Disability, and engaging guest speakers, where applicable.</p>	On track	December 2022, 2023, 2024	Medibank marked International Day of People with Disability in 2022 together with recruitment start-up, The Field – an online, candidate-centred recruitment platform that connects candidates with disability with organisations that want to hire more inclusively. To kick off our work together, Andrew Retschko, Senior Executive Talent Inclusion & Capability interviewed Joel Sardi from The Field at a virtual event for all Medibank employees.

Creating an inclusive, safe and disability confident workplace

Commitment	Deliverables	Status	Timeline	Progress
Medibank will build a diverse workforce reflective of our diverse customers and community through meaningful, sustained employment opportunities.	12. Develop and promote an interactive employee proposition to showcase Medibank as an employer of choice for people with disability and carers for people with disability or chronic illness.	On track	Ongoing	<p>Medibank's interactive employee proposition as an employer of choice for people with disability and carers for people with disability or chronic illness continues to grow. In the past 12 months we have implemented or progressed the following supporting initiatives:</p> <ul style="list-style-type: none"> Extended our carers support package to offer an additional 50 places for carers to access tailored, confidential guidance from our own health concierges. Progressed our Disability Confident Recruiter (DCR) submission toward our June 30, 2023 certification deadline. Refined our workplace adjustment process to support a more streamlined experience. Partnered with The Field to create targeted, tailored job ads.
	13. Review language in job advertisements for all roles to ensure they are inclusive and encourage diverse candidates to apply.	Achieved	December 2022	As part of our work towards achieving Disability Confident Recruiter (DCR) status (action 19, due June 2023) job advertisement templates were reviewed for inclusive language. Standard accessibility inclusions are now embedded alongside capacity building for the recruitment team who review job ads ongoing.
	14. Work with partner organisations in the disability space to build a pipeline of talent with disability within Medibank including targeted employment opportunities for people with disability.	Achieved ahead of schedule	December 2023	In early 2023, Medibank established a partnership with The Field as a founding client to connect with more candidates with disability through an online candidate-centred role match-making process.
	15. Throughout the recruitment process, share with candidates the access features of interview locations, including physical and sensory factors, including in job advertisements, where applicable.	Achieved	December 2022	As part of our work towards achieving Disability Confident Recruiter Status, this information is now shared if a candidate discloses disability or requests an adjustment in the recruitment process. The next step is to explore sharing this information with all candidates, regardless of disclosure.
	16. Develop a strategy to build meaningful career pathways for people with disability from entry level internship and graduate opportunities to senior roles.	Not yet due	June 2023	Progress to be updated in subsequent reports.
	17. Utilise diverse recruitment panels and disability confident recruitment agencies in the recruitment of leadership roles, where applicable.	Not yet due	June 2023	Progress to be updated in subsequent reports.
	18. Ensure all hiring managers uplift their inclusion capability and complete disability awareness training.	Achieved	December 2022	All people leaders along with all employees are now required to complete mandatory, annual training to uplift inclusion capability and disability awareness. Participation is tracked and recorded.
	19. Achieve Disability Confident Recruiter status with Australian Network on Disability.	Not yet due	June 2023	Progress to be updated in subsequent reports.

Creating an inclusive, safe and disability confident workplace

Commitment	Deliverables	Status	Timeline	Progress
Medibank will foster a disability confident culture with a focus on strengthening capability of our senior executives and people leaders.	20. Conduct a review of inclusion capability needs within our organisation and develop and maintain an effective inclusion learning strategy in consultation with employees, advisors and partners.	Achieved	June 2022	A Medibank-wide inclusion capability strategy was developed by Learning & Development and Diversity & Inclusion teams with co-design support from employees and stakeholders with lived experience.
	21. Uplift disability confidence through disability awareness training for all employees, including: <ul style="list-style-type: none"> a. Update annual compliance training to include disability awareness content. b. Update induction training to include disability awareness content. c. Ensuring relevant specialist teams complete disability awareness training including, but not limited to, Talent Acquisition, People, Culture & Sustainability Business Partnering, D&I squad members, and customer facing teams. 	Achieved after deadline	December 2022	Disability awareness training, co-designed with people with lived experience was developed and launched in December, 2022. <ul style="list-style-type: none"> a. A stand-alone disability awareness module is now an annual requirement for all employees. b. The disability awareness module is also embedded into mandatory induction training for all new starters. c. Specialist teams have almost all completed disability awareness training including: Talent Acquisition, Culture & Sustainability. Refreshed D&I squad members and customer facing teams have until 30 June 2023 to complete.
	22. Uplift leadership capability through ongoing education opportunities (including immersive experiences) for people leaders and develop guidance material for managers to build confidence in leading people with disability, those with an accessibility adjustment and carers for people with disability or chronic illness.	Not yet due	December 2023	Progress to be updated in subsequent reports.
	23. Accelerate opportunities for employees with disability to participate in leadership and professional development programs.	Not yet due	June 2023	Progress to be updated in subsequent reports.
	24. Participate in Australian Network on Disability's PACE mentoring program.	Achieved	August 2022, 2023, 2024	Medibank continued to participate in the PACE mentoring program, with 12 mentors in 2022.
	25. Appoint a Senior Executive Disability Champion to provide leadership and demonstrate Medibank's commitment to accessibility and inclusion and drive strategic change.	Exceeded target	December 2022	Kylie Williamson, Senior Executive Core Medibank Customer Systems continued in her role as Accessibility & Inclusion Plan (AIP) work group chair, providing leadership and removing barriers to support the achievement of AIP actions. Further to this, Mei Ramsey, Group Executive Legal, Governance & Compliance was appointed Executive Leadership Team (ELT) AIP sponsor.

Creating an inclusive, safe and disability confident workplace

Commitment	Deliverables	Status	Timeline	Progress
Medibank will enable a working environment where our people can thrive.	26. Ensure that new office spaces are designed according to universal design principles in consultation with people with disability.	On track	Ongoing	The process for reviewing the new Medibank Melbourne office design included consultation with Get Skilled Access who provided input and feedback on Accessibility and Inclusion of the space. This guidance will form the basis of a new set of principles for use in future potential Medibank corporate office designs.
	27. Undertake a systems audit of our current systems to determine incompatibility with assistive technologies.	Achieved	June 2022	An audit of all 17 Medibank systems was completed to determine incompatibility with assistance technologies. 15 systems were identified as compatible with known software/hardware, one was identified as inaccessible and is now retired, and one system was identified as accessible but can be improved further. This is planned for 2023.
	28. Prioritise and address systems which are incompatible with assistive technology.	Not yet due	June 2024	Progress to be updated in subsequent reports.
	29. Embed accessibility requirements in the process of scoping and purchasing new tools, software, systems including user testing by people with disability.	Achieved	June 2022	<p>Medibank's supplier questionnaire now includes a request for information around accessibility. Working together with the technology team, the next step is to build universal design principles into the scoping process of any new system, tool, and software.</p> <p>Alongside this, the Medibank Accessibility Adjustments tools hub continues to expand. It consists of all software and hardware options that have passed user-testing requirements by employees and are available for use.</p>
	30. Communicate with employees about the Personal Emergency Evacuation Plan (PEEP) process annually.	On track	Ongoing	The employee intranet and mandatory annual health and safety training included specific communications about the Personal Emergency Evacuation Plan (PEEP) process and offered support to any employee seeking to create one.
	31. Introduce a process to track and report on the success of accessibility adjustment requests.	Achieved	December 2022	A tracking and reporting system has been established for accessibility adjustment requests. The process upholds privacy by limiting access to only employees involved in the workplace personalisation/adjustment process.
	32. Continue to embed our ways of working strategy, Future Fit, which provides our employees with choice in the location and the way in which they work, where applicable.	On track	Ongoing	Medibank's Future Fit policy continues to ensure all employees have flexibility in the choice of location and how they work, this includes no mandated or expected office days per week.
	33. Deliver a targeted support package to improve the experience of employees with caring responsibilities for elderly parents, or person with disability or chronic condition.	Not yet due	June 2023	Progress to be updated in subsequent reports.

Ensuring an equitable and accessible customer experience

Medibank is committed to creating an accessible experience for its current and future customers.

Commitment	Deliverables	Status	Timeline	Progress
Medibank will work to ensure equitable access to products and services for our customers.	34. Ensure digital accessibility standards are met in line with externally benchmarked standards (WCAG 2.2 AA), as part of ongoing website and app development where applicable.	On track	Ongoing	This continues to be an ongoing capability uplift across website and app development of each feature release. In this way it is an always-on activity that the relevant teams have now embedded into standard development processes.
	35. Provide a feedback mechanism on our website for customers regarding accessibility requests.	Not yet due	June 2024	Progress to be updated in subsequent reports.
	36. Ensure all retail store fit outs consider universal design principles.	On track	Ongoing	Relevant Medibank teams worked with Get Skilled Access who have provided an initial report for Retail Stores on design principles and standards that Medibank can implement. Next steps are to engage with key stakeholders to determine and agree to a prioritisation and implementation schedule.
	37. Roll out the new Disability Confident Retail Toolkit and Adjustment Guidelines to all retail employees to build their disability awareness in communication, National Relay Service, accessible procedures and offering adjustments.	Partially achieved	December 2022	The Disability Confident Retail Toolkit and Adjustment Guidelines have been developed and are ready for socialising with all retail employees. This action was delayed due to Medibank's strong focus on our customers during the cyber event in the second half of 2022.
	38. Develop a process for a person with disability to book an appointment in a retail store, including with a carer or interpreter.	Not yet due	June 2024	Progress to be updated in subsequent reports.
	39. Continue to integrate inclusive and universal design into any new product and service development, including consultation with people with disability.	On track	Ongoing	Integration of inclusive and universal design into any new product and service development is supported by members of the Accessibility Work Group and partners such as Get Skilled Access and Intopia. The next step is to embed this into formal product/service development processes.
	40. Ensure the design of all clinical services considers the needs of people with disability through the inclusion of advice and input from stakeholders experienced in these areas.	On track	Ongoing	Inclusive clinical service design considerations are underway in some service delivery and development areas such as Virtual GP. The next step is to develop and implement an organisation-wide strategy for embedding inclusive clinical service design across Medibank and Amplar.

Ensuring an equitable and accessible customer experience

Commitment	Deliverables	Status	Timeline	Progress
Medibank will ensure accessible communication with customers.	41. Ensure digital accessibility standards are met in line with externally benchmarked standards (WCAG 2.2 AA), for social media communications where applicable.	On track	Ongoing	Social media communications at Medibank are scheduled for review as part of an external audit by our partners at Intopia. This is with the view to ensuring digital accessibility standards are met in line with benchmarked standards (WCAG 2.2 AA) where applicable.
	42. Ensure the design of our membership cards are accessible to provide independent use for members.	Achieved	June 2022	In March 2022, our membership cards were redesigned with accessibility features including thumb notch and unique embossed dots. To avoid stock wastage the new cards were phased in from July 2022.
	43. Continue to improve the accessibility of our customer communications.	Achieved	December 2022	Medibank's marketing team participated in a 3-session training program with Intopia in 2022. Training focused on creating more accessible Electronic Direct Marketing (EDM) communications and these have been embedded into BAU processes.
	44. Develop 'how to' guides in Easy English for key information pertaining to policy information and processes.	Not yet due	June 2024	Progress to be updated in subsequent reports.
	45. Conduct a regular review of brand guidelines and marketing imagery to ensure it authentically and respectfully represents people with disability.	On track	Ongoing	Medibank's branding was updated during the reporting period along with an accompanying marketing campaign. Through this process, brand guidelines and imagery were reviewed to ensure it was an authentic and respectful representation of people with disability, including an Instagram collaboration with Jimmy Jan.

Establishing strong, mutually beneficial relationships with community partners

Medibank has meaningful relationships with organisations that support inclusion of people with disability and carers, and these relationships translate to meaningful and positive social impact.

Commitment	Deliverables	Status	Timeline	Progress
Medibank will partner with organisations to advance the inclusion of people with disability in all aspects of life.	46. Continue relationships with partners who provide advice and consult on issues relating to people with disability including Australian Network on Disability and Get Skilled Access.	On track	Ongoing	Medibank continues to value its partnerships with Australian Network on Disability and Get Skilled Access who provide valuable advice and consultation in the implementation of AIP commitments.
	47. Utilise Medibank resources to support community partners in the disability sector to achieve their strategic objectives including building commercial acumen and/or other projects.	On track	Ongoing	Through our continued partnership with Get Skilled Access, Medibank had the two-way learning opportunity to work with The Field in the pilot and testing phase of their commercial recruiter profile platform. Alongside this, Medibank also supported the Australian Network on Disability (AND) including sponsoring the 2022 AND Conference, participation in their Index Advisory Panel and presented at the Disability Champion Roundtable in March 2022.
Medibank will broaden our sphere of influence with our partners to improve the experience of people with accessibility requirements.	48. Connect with other organisations on their accessibility journey to share our learnings and advance the inclusion of corporate Australia.	On track	Ongoing	Medibank continued to connect with other organisations with the purpose of sharing learnings including: Breast Cancer Victoria, Swinburne University (including hosting students), CBA and Bupa (workplace adjustments), and Apple (carers support).
	49. Support corporate partners to increase their inclusion capability within their organisation and foster an environment for learning for our community.	Not yet due	December 2024	Progress to be updated in subsequent reports.

Establishing strong, mutually beneficial relationships with community partners

Commitment	Deliverables	Status	Timeline	Progress
Medibank will encourage accessibility and diversity considerations in our procurement procedures.	50. Publish a procurement checklist with access and inclusion criteria to aid our vendor selection process particularly with IT suppliers.	Achieved	June 2022	As part of our supplier selection and evaluation process, Medibank's Business Principles questionnaire includes access and inclusion criteria in particular compliance with WCAG and assurances of compliance.
	51. Identify and develop a list of preferred suppliers within the disability and accessibility sector.	Not yet due	June 2023	Progress to be updated in subsequent reports.
	52. Review and update procurement procedures and policies to remove barriers for accessibility support and services.	Achieved	December 2022	Medibank's Procurement Team updated both the Medibank Procurement Policy document and the Procurement Procedure document in April 2022. The updated versions ensure that there are no barriers to the engagement of accessibility support and services.
	53. Review, update and promote our external supplier page to include all our responsible buying guidelines, including access and inclusion.	Achieved	June 2022	Our Sustainable Procurement internet page was updated in June 2022 to promote to our suppliers the importance of diversity and inclusion to Medibank supplier engagements, along with providing links to BuyAbility and our Diversity and Inclusion Policy.
	54. Continue to procure technology providers that align with Medibank's accessibility and inclusion commitments.	On track	Ongoing	Through Medibank's new supplier questionnaire and access and inclusion criteria, factoring accessibility into our technology procurements is now a business-as-usual process. The next step is to identify and implement a process for ensuring accessibility is embedded into all new technology related projects at design-phase, rather than procurement phase.

Medibank will be transparent about our commitment to accessibility, sharing achievements and challenges throughout the progress of our plan

Medibank is transparent about our commitment to accessibility; we share when we get it right and when we don't and foster an environment for learning for our community.

Commitment	Deliverables	Status	Timeline	Progress
Medibank will be transparent about our commitment to accessibility, sharing achievements and challenges throughout the progress of our plan.	55. Lodge Medibank's Accessibility and Inclusion Plan with the Human Rights Commission.	Achieved	July 2022	Medibank's Accessibility and Inclusion Plan was lodged with the Australian Human Rights Commission upon launch and can be viewed here .
	56. Report progress to People, Culture & Sustainability leadership team, Diversity and Inclusion Council, Executive Leadership team and Medibank Board to ensure ongoing progress and early identification of issues.	On track	Ongoing	<p>Ongoing progress updates are provided to key stakeholder groups by representatives from the Accessibility / AIP work group members:</p> <ul style="list-style-type: none"> • People, Culture & Sustainability leadership team: Senior Executive Talent, Inclusion & Engagement. • Accessibility work group and EMPOWER network leads: Diversity & Inclusion Council. • Group Executive Legal, Governance and Compliance: Executive Leadership Team and Medibank Board. <p>Progress updates were provided at Quarterly Diversity & Inclusion Council meetings and a February 2023 Board update.</p>
	57. Communicate to our people and our customers on the progress against our Accessibility and Inclusion Plan annually, including in our Annual and Sustainability reports.	On track	September 2022, 2023, 2024	Medibank's 2022 Annual and Sustainability Reports included progress updates against our Access and Inclusion Plan. These were also accompanied, internally, by frequent intranet articles, Yammer posts, team updates and Quarterly Diversity & Inclusion showcases.
	58. Participate in the Australian Network on Disability Access and Inclusion Index as an independent audit of our action plan progress.	On track	December 2022, 2023, 2024	Medibank participated in the AND Access and Inclusion Index in 2022 and 2023. Over the past 12 months our position in the Index increased 8 places, from 11th overall in 2022 to equal 3rd overall in 2023.