

# Accessibility and Inclusion Strategy

2024–2026







## **Acknowledgement of Country**

We acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country throughout Australia, and recognise First Nations peoples' continuing connection to the land, waters and sky.

We pay our respects to Elders past and present, and commit to listening, learning and working together with Aboriginal and Torres Strait Islander peoples in partnership and respect.

We walk together with Aboriginal and Torres Strait Islander peoples towards a brighter and more inclusive future for all Australians.

This strategy was created on Gadigal Country.

## **Recognising people with disability**

We acknowledge and pay our respects to all those who are working to establish accessibility and inclusion as universal human rights. We honour this diverse community, including people with disability, people who are neurodivergent, and carers.

Our families, communities and society are made richer by the diverse stories, perspectives, unique talents and skills of all Australians.

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This strategy has been developed for the Commonwealth Bank of Australia (CommBank) and the brands, Bankwest and CommSec, which the Group operates.





# Foreword

## A bank for all Australians

Our purpose is to build a brighter future for all.

This means we are committed to enabling our customers to access our products and services with dignity and ease, regardless of their background, abilities or circumstances.

We're finding ways to create environments that give our people the opportunity to be their best, and feel safe, respected and included.

To achieve this, everyone at CommBank has a responsibility to understand and advocate for accessibility and inclusion.

In the two decades since CommBank introduced what was originally known as its Disability Action Plan, we've made meaningful progress towards improving the experiences of our customers and people.

More recently, we launched the [Equal Access Toolkit](#) across all our branches, and redesigned our cards to make them easier to use, including by customers with low vision. We also introduced a new Marketing Accessibility Standard so that CommBank customer communications are accessible and inclusive.

We recognise that the journey towards accessibility and inclusion continues to evolve as expectations shift, and that there will always be more to do.

Our *Accessibility and Inclusion Strategy 2024–2026* sets out our goal to design inclusive products, services, experiences and workplaces that provide equitable access and dignity for all our customers, people and communities.

We call this Dignity by Design.

According to the [Australian Bureau of Statistics](#), one in six Australians, or almost 4.4 million people, live with disability, and for people aged 65 years and over, the proportion rises to one in two. Around one in 10 Australians are carers, providing unpaid care for friends or family members.

These statistics underscore the fact that disability is a part of life for many of us, directly or indirectly.

This strategy describes our approach to driving change in the years to come. Importantly, it has been created with, and informed by, our customers and people with disability and those who are neurodivergent, as well as their carers and our community partners. Their experiences, insights and perspectives have been invaluable in shaping our approach and defining where we will direct our efforts over the next three years, and beyond.

While we've focused on accessibility in the context of disability in our strategy, it's not just people with disability who will benefit. As Australia's largest bank, we believe that by adopting an inclusive mindset, we can have a broader positive influence. When we design for inclusion, everyone benefits.

By living our values of care, courage and commitment, and fostering an environment that celebrates inclusion, we will continue to be the bank for all Australians.



A handwritten signature in black ink, appearing to read 'ASullivan'.

**Angus Sullivan**  
Group Executive Retail  
Banking Services  
Commonwealth Bank

# A message from the CEO of Australian Network on Disability

The Australian Network on Disability (AND) congratulates CommBank on the launch of their new *Accessibility and Inclusion Strategy 2024–2026*. This strategy demonstrates CommBank’s longstanding commitment to designing inclusive products, services, experiences and workplaces that provide equitable access and dignity for all Australians.

With Dignity by Design at its core, this strategy sets out three main pillars – mindset, maturity and measurement – and 11 strategic focus areas. Affirming CommBank’s commitment to its employees, customers and communities, the development of the strategy was guided by extensive consultation using a human-centered design approach.

AND is proud to have supported the development of this strategy, which is just one of many important projects that AND and CommBank have partnered on over the last 19 years.

We wish CommBank every success with the implementation of this *Accessibility and Inclusion Strategy* and look forward to continuing to support CommBank in creating a more equitable and inclusive Australia.



**Corene Strauss**  
CEO  
Australian Network on Disability



# Thank you

This strategy was developed in partnership with the Australian Network on Disability, and co-designed with people with disability, carers, those who are neurodivergent, subject matter experts, our people and community partners.

We are deeply grateful to everyone who gave their time, insights and perspectives, with special thanks to:

- Australian Network on Disability
- Carers Australia
- CommBank's Human-Centred Design Team
- CommBank's Enable Employee Network
- Council on the Ageing
- Deaf Australia
- First Peoples Disability Network
- Guide Dogs Australia
- National Ethnic Disability Alliance
- National Seniors Australia
- Neurodiversity Hub
- Physical Disability Australia
- Scope Australia
- Vision Australia.



# Introduction

## Disability – it might be different to what you think

### Recognising the diverse needs of our people and communities



**4.4 million**

Australians live with disability (ABS 2018).



**2.65 million**

Australians are carers, representing **10.8%** of all Australians (ABS 2018).



**48%**

of people with disability who are of working age (aged 15–64) are employed, compared to 80% without disability (AIHW 2022).



The proportion of Australians who live with disability rises to

**one in two**

for people aged 65 and over (ABS 2018).



**80%+**

of people with disability have a non-visible disability (AHRC, 2022).



**Almost everyone**

will temporarily or permanently experience disability at some point in their life (WHO n.d.).



**4.6%**

of Australians (**over 1 million people**) report having psychosocial disability, including but not limited to a brain injury, mental illness, or a nervous or emotional condition (ABS 2020).



**7.6%**

of CommBank and Bankwest employees identify as living with disability (CommBank 2023).



**59.4%**

of CommBank and Bankwest employees have caring responsibilities, including but not limited to caring for people with disability, a medical condition or chronic illness (CommBank 2023).





## Fix the environment, not the person

Often, the biggest challenges for people with disability are the societal barriers that impact participation in day-to-day activities. This includes negative attitudes, such as low expectations of people with disability. Types of disability vary, but whatever form they take discrimination can affect a person's ability to meaningfully engage with others – especially when the disability intersects with factors like a person's age, gender or cultural background.

Barriers such as social stigma, the absence of physical access, or a simple lack of awareness on behalf of other people can contribute to a person's ability or inability to equitably participate. Other barriers include inadvertent discrimination in laws and policies, reluctance to consider the different ways people communicate, and the accessibility of technology.

As defined by the social model of disability, it is these barriers that are considered to be obstacles to a person's equal participation, not their disability.

When we listen to people with lived experience, we can better understand how social and environmental factors can exclude people with disability from participating fully in society. This is the first step in bringing about positive change. The next is understanding we all have a role to play in creating a more inclusive society. If we commit to doing so, we open the door to positive change and create opportunities that benefit everyone.

## Disability is part of the human experience

Most Australians will experience disability themselves or care for someone with a disability at some point in their lives.

Disability can be temporary, situational or permanent, and inherited or acquired. It can also affect any age group, from young children through to teens, adults and older people.

Not all disability is visible. The symptoms of chronic illnesses like diabetes, arthritis and epilepsy, or mental health conditions like anxiety and depression, may not be obvious.

And, as each person is an individual, no two experiences of disability are the same. Everyone has their own needs and circumstances.

While some people identify as having a disability and others don't, everyone can benefit from being included. Accessibility features like easy-to-use banking apps, clear signage outside branches, and forms and cards that can be used by people with low vision, can make life easier for everyone.



### **Our approach to accessibility and inclusion**

While Australia's *Disability Discrimination Act 1992* focuses on physical descriptions of medical conditions and illnesses, we adopt the broader concept of people with disability outlined in the UN Convention on the Rights of Persons with Disability in our approach to accessibility and inclusion. This concept is underpinned by the social model of disability.

We also recognise the contributions and needs of carers, with the *Carers Recognition Act 2010* (Cth) shaping our approach.





# Our progress

## Highlights from 2021–2023

Over the past three years, we've been working towards improving accessibility and inclusion for our people, customers and communities in line with CommBank's *Accessibility and Inclusion Plan 2021–2023*. Here are some of the actions we have taken so far. We recognise that there is still more to do.



### Supporting our people

We're enabling accessibility and inclusion in our workplaces.



#### Accessibility and inclusion training

In FY2023, **41,000+** CommBank and Bankwest employees completed accessibility and inclusion training.



#### Respect Lives Here

In December 2021, we launched Respect Lives Here, an initiative **designed to foster a culture of safety, respect and inclusion** in the workplace.



#### 10 years of Enable

In June 2023, our **Enable employee network turned 10** – celebrating a decade of supporting accessibility and inclusion for CommBank employees and raising awareness of disability.



#### IncludeAbility membership

In 2021, we joined IncludeAbility, an initiative of the Australian Human Rights Commission developed to **increase employment opportunities** for people with disability.



## Delivering for our customers

We've made changes to our products and services to make life easier for our customers.



### Accessible debit and credit cards

We redesigned CommBank cards to include a range of accessibility features and be more inclusive.

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### Communication boards and cards

We introduced supports in CommBank branches to help customers who cannot talk, or whose speech may be more challenging to understand.

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### Equal Access Toolkit

We rolled out practical tools and supports in our Equal Access Toolkit to make it easier for customers to complete their banking across all CommBank and Bankwest branches.

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### Easy English guides

We expanded our suite of Easy English guides to assist customers who have a diverse range of communication needs.

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### Branch braille and tactile signage

We redesigned and implemented new opening hours signage across all CommBank and Bankwest branches.

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### Web Content Accessibility Guidelines (WCAG) 2.1 AA

We implemented WCAG as our standard for all new websites and app updates.

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### Bankwest App 5.0

We conducted extensive research and testing during the design of the app to ensure it was accessible.

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**We've improved accessibility and inclusion across our systems and governance.**



### **Access and Inclusion Index**

We continue to participate in the Australian Network on Disability's Access and Inclusion Index. We've been a Gold member of the network since 2018 – along with other organisations that actively contribute to making Australia more inclusive and accessible.

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### **Auslan interpreters**

We made it easier for CommBank employees to engage a qualified Auslan interpreter for customers who may require interpretation to do their banking.

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### **Marketing Accessibility Standard**

We created a new standard in consultation with Vision Australia for all CommBank marketing and communications.

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## Working with communities

We're supporting accessibility and inclusion in communities.



### CommBank Community Grants

We provided over \$1 million in funding to 114 community organisations that promote inclusion.



### CommBank ParaMatildas and CommBank Pararoos

We support Australia's national football teams for players with cerebral palsy, acquired brain injuries and symptoms of stroke.



### Cricket Australia's *A Sport for All* program

We support Cricket Australia's *A Sport for All* program, which champions inclusion and diversity through community initiatives with cricketers with disability, and with First Nations, multicultural and LGBTQI+ players.



### Community Council

We regularly consult with over 20 community organisations (including disability focused organisations) to get feedback on ways to improve the design of our products and services.



### Alumni Connect

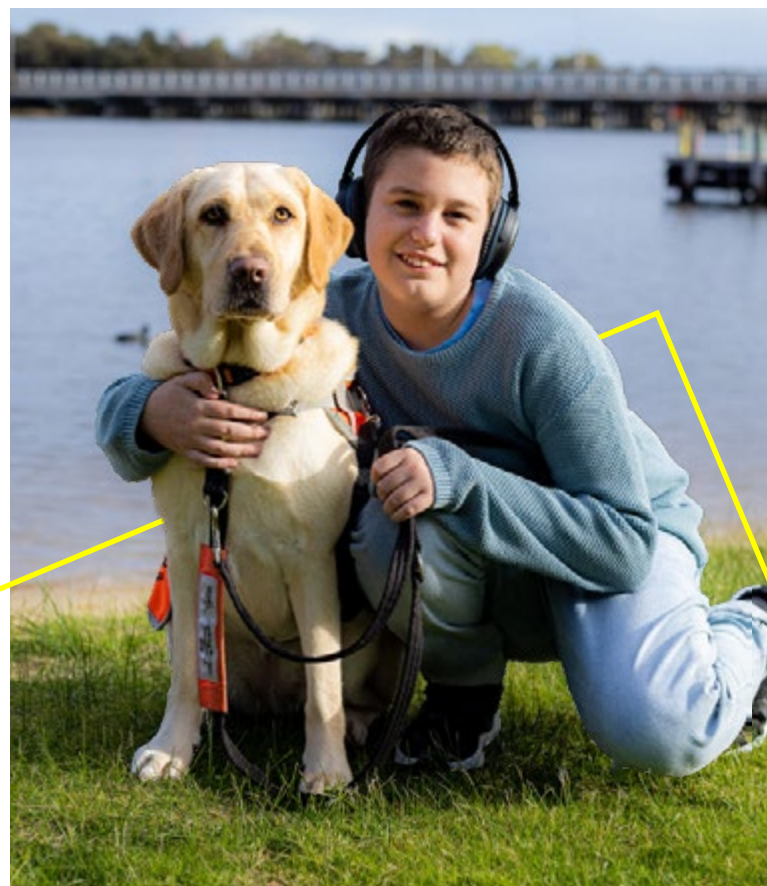
We are a founding partner of the Australian Network on Disability's Stepping Into Alumni Network – Australia's first alumni network for university graduates with disability that aims to provide job and networking opportunities, and professional development.



### Guide Dogs WA

Together with the Bankwest employee fundraising group, we donated more than \$77,000 to Guide Dogs WA to support its work in training assistance dogs for Western Australians living with low vision, disability or illness.

Photo courtesy of Guide Dogs WA.





# Our Enable network

## Empowering our people

Our employee-led network, Enable, empowers our people to make a difference at work, and in the lives of their co-workers and communities.

Established as part of CommBank's diversity, equity and inclusion strategy in 2013, Enable advocates for people with disability, people who are neurodivergent, and carers of people with disability by:



### Shining a spotlight on inclusion

Sharing lived experiences and highlighting the benefits of creating an accessible and inclusive environment for our colleagues, customers and communities.



### Advocating for change

Connecting with leaders and engaging teams across the bank.



### Raising awareness

Sharing the tools CommBank has created for our people and customers with disability with colleagues across the Group.



## A message from Enable

Through Enable we are empowering our people to raise awareness about – and advocate for – accessibility and inclusion for people living with disability, people who are neurodivergent, and carers.

We know that positive change leads to a more equitable workplace, and that shining a spotlight on accessibility can provide better opportunities and access. This improves the overall experience for everyone.

Enable plays a key role in promoting the importance of inclusion and informing solutions for our people and customers. We build empathy, knowledge and support, recognising that every person is valuable.

Enable's recent 10 year anniversary provided an opportunity to celebrate some of the network's significant achievements. We are fostering a sense of belonging through Enable and have heard great stories about the difference it has made for our people.

Looking ahead, we will ensure Enable is aligned to this strategy by recognising that all talents, perspectives and contributions can enrich our organisation, and by making further positive steps forward to support greater accessibility.



**Gavin Munroe,**  
Group Chief Information  
Officer

**“Understand that once you take the step of speaking up at work about what support you need, you’re not done. In fact, you might only just be getting started. The great thing about my manager and small team is that they’re not afraid to stand up for me, helping educate others and raising awareness about deafness, and making sure I feel included in discussions.”**

Andrew, Service Delivery Manager,  
Digitisation Technology





## Enable turns 10!

To celebrate 10 years of Enable, we engaged Studio A to deliver an art-making workshop. Studio A is a Sydney based social enterprise that provides professional development for artists with intellectual disability.

Guided by Studio A artists, Lauren Kerjan and Emily Crockford, our people contributed to an artwork celebrating accessibility and inclusion based on the motif of a sunflower – the internationally recognised symbol of non-visible disabilities.



CommBank team members create petals for the sunflower artwork.



Artists from Studio A who delivered the art-making workshop for Enable's 10th birthday celebration.



## Celebrating International Day of People with Disability

Each December, CommBank comes together to support International Day of People with Disability – a United Nations–sponsored day to promote the rights and wellbeing of people with disability across all parts of society.

Our guest speakers have included people with lived experiences of disability who work with us, as well as Sam Bloom, a two time para surfing champion and the author of bestselling book *Penguin Bloom*, which was adapted for a film starring Naomi Watts.

**“No matter how much you hurt or how bad you feel, accepting the love of others, and loving them in return to whatever degree you can, will help you feel whole again. Trust me – I know.”**

Bestselling author, Sam Bloom, at CommBank’s International Day of People with Disability celebration in 2022



Sam Bloom (centre) and her husband, Cameron, share their story with Enable’s co-chair, Jo, at our 2023 celebration of the International Day of People with Disability.



## Jo's story

Jo is CommBank's Head of International Financial Services. She has been a member of Enable for 10 years, serving as co-chair from 2020 to 2023.

Jo's motivations for joining Enable were simple but powerful. Diagnosed with multiple sclerosis 21 years ago, Jo gained a new perspective. Her manager at CommBank supported her during her return to work, and Jo saw the value of helping others in similar situations. So, when the opportunity came to join Enable, she enthusiastically took it.

"I really wanted to raise the profile of disability and to provide an avenue where CommBank employees, either living with disability or caring for someone with disability, could seek support and advocacy," Jo explains.

**"A big part of what we do is just let people know that we're here – that there is a place people can come for support."**

Since its inception, Enable has made significant strides towards promoting equality at CommBank, providing support for employees and promoting wider organisational awareness. Jo emphasises that these achievements would not have been possible without people volunteering a significant amount of their time.

"The fact that the Enable employee network has existed for 10 years is testament to the enormous commitment from a dedicated group of people."





Gina and Al.

## Al's story

Al works as an agile coach at CommBank and is an Enable champion. He also cares for his partner of 16 years, Gina, who has low vision and is legally blind.

Whenever Al does an interview or speaks about being a carer, he begins in a slightly unusual way.

"I start by saying 'Hi. My name's Al. I'm a white, middle-aged male. I have dark brown hair, blue eyes, a brown beard. I'm wearing a red hoodie and am in a room where there's a window on my right. I'm telling you all of this because I'm here as a carer who looks after someone who has low vision."

The reason behind the description is both considered and practical. "I don't know who my audience is, so I don't know whether they can see me or not," he says.



## The importance of flexibility

According to the [Australian Bureau of Statistics](#), in Australia, one in 10 people are carers, taking time to look after a friend or family member. But caring for loved ones often requires increased flexibility in the workplace.

As Al explains, eye specialists tend to work 9 to 5, Monday to Friday – the same hours as other people, including Al. In this situation, reliably being able to fit work hours around appointments is vital.

The relaxed approach of Al's managers at CommBank has helped no end, he says.

"I've always had good managers. They've been really understanding."

Al has also been given the opportunity to work from home when he needs to.

But the relationship between manager and employee is reciprocal, something that Al is keen to stress.

"They've been good to me as a manager and I'm good to them in return," he says. "My work doesn't suffer for it. I make sure I make the hours up, and I'll move any meetings that I need to. I really appreciate my managers looking after me in this way, and helping Gina, ultimately. I respect that and I want to show that by showing up in a meaningful way."

## An opportunity to give back

Determined to make his experiences in caring for Gina count for others, Al has contributed to several accessibility initiatives at CommBank, including providing feedback on the design of forms, customer-facing web pages and the CommBank app.

**"My experience with Gina has brought me a new understanding on how relatively small things like logical and consistent fields in online forms can really make a huge difference."**

It has also heightened his empathy for others.

"If I see that someone in my team doesn't understand a task they need to perform, I stop and think about how I might be able to explain it differently."

His experience has shown him that different people have different needs, and we all have a role to play in creating environments where everyone can perform at their best.

# Making our services more accessible to our customers



## Improving our branch experience

Thanks to our [Equal Access Toolkit](#), our branches have become more accessible for our customers.

We rolled out the toolkit to all CommBank and Bankwest branches in 2023. Co-designed in consultation with community partners and people with disability, it consists of simple but practical tools developed with the needs of customers in mind.

Tools include communication boards\* to assist customers with limited to no speech or who speak a language other than English, and customer preference cards that let customers discreetly share their accessibility requirements with us.

Signature guides enable customers who are blind or who have low vision to sign paper documents and forms independently, in the right spot. To use them, a branch team member places the signature guide over a form, lining up a slot with the spot where the signature needs to go. The customer then signs inside the slot. There are also guides for signing on electronic signature pads.

\* Communication boards and cards are only available in CommBank branches.

**“The Equal Access Toolkit addresses the individual needs of customers that are not always obvious. It is empowering to be considered in a manner that makes banking easier. Simple, considered solutions do make a difference to us.”**

Rob, CommBank customer with low vision

High contrast keyboards help customers identify keys when typing a password or other information, while magnifying tools assist with reading documents and using a PIN pad or keyboard.

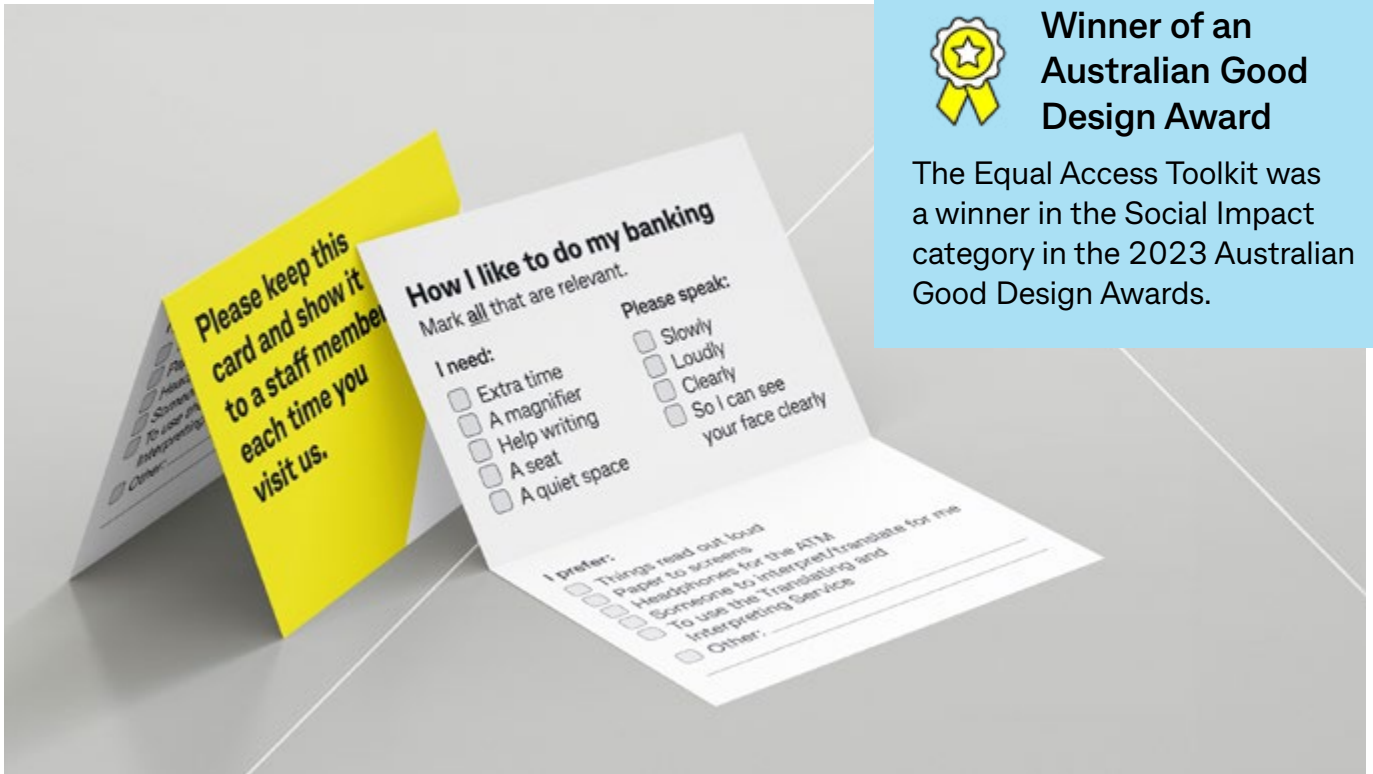
Other tools include pens with thicker nibs and blacker ink to help customers see what they have written more easily. We’ve also made Jumbo pens readily available, as they’re easier to hold for many customers, including older customers and people with disabilities that affect fine motor skills.

Every CommBank and Bankwest branch across Australia has a toolkit, so customers can be assured they can access these items whenever they are banking with us.



## Winner of an Australian Good Design Award

The Equal Access Toolkit was a winner in the Social Impact category in the 2023 Australian Good Design Awards.



The customer preference card enables customers to discreetly share their accessibility preferences when they visit a branch.

## What's in the Equal Access Toolkit?



Magnifying tools



Jumbo pen



Earphones



Signature guide



High contrast keyboard



Customer preference card



High contrast clipboard



Communication boards and cards\*



High contrast pens





## Meeting the needs of our customers

When CommBank branch manager Natasha learned Auslan – the sign language of the Australian Deaf community – she got more back than she had ever hoped for.

As manager of a branch in a close-knit community for six and a half years, Natasha has had the privilege of meeting many of its locals. So, when George\* walked through the door one day, she welcomed him and asked how she could assist.

George wasn't comfortable using the ATM, nor did he bank online. George is also deaf. But at the branch, nobody knew Auslan, so he had to rely on hand signals and written notes to make his needs clear.

Natasha wanted to do more to help, so she enrolled herself in an Auslan course at TAFE.

Three months into her course, Natasha is already able to chat with George and help him with his banking needs. Moreover, George was unaware of services available in his community, so Natasha assisted him with contacting Deaf Connect, which provided a free translator for the church service he attends.

Natasha's enthusiasm has led to several other colleagues joining her in learning Auslan – broadening their own skills and improving the accessibility of services at the branch.

\*Name has been changed to protect the customer's privacy.







Our more inclusive card designs.

## CommBank's accessible products – designing 'with' not 'for'

[Vision Australia](#) estimates that over 450,000 Australians are blind or have low vision, and many more can experience temporary vision loss due to an accident or medical condition. This can make it challenging to perform everyday activities such as banking, paying bills and shopping.

As Australia's largest bank, we acknowledge that incorporating simple measures into daily activities can improve the experiences of our customers.

### A question of inclusive design

One way we have made a difference has been to make our cards easier to use for more of our customers.

We developed cards with a range of accessibility features and sought the help of Vision Australia to test the prototypes with people who are blind or who have low vision.

"Focus groups were given physical samples of the cards. They felt them, they talked about them, they gave us tips," says Melissa from CommBank's Marketing and Corporate Affairs team.

**"User testing is critical because you don't know what you don't know until you meet with customers and get to learn more about the challenges they face ... It's critical to have the conversation."**



The perspectives were invaluable and helped us to introduce four simple improvements.



### **Notches**

Help customers orientate cards when using them at an EFTPOS machine or ATM.



### **Tactile dot(s)**

CommBank cards have both a notch and a tactile dot to make it easier for customers to tell when they are touching a CommBank card.



### **A contrasting colour scheme and distinct patterns**

Those with low vision can more easily differentiate between their debit, credit, corporate and business cards.



### **Increased font size, thickness and spacing of numbers and letters**

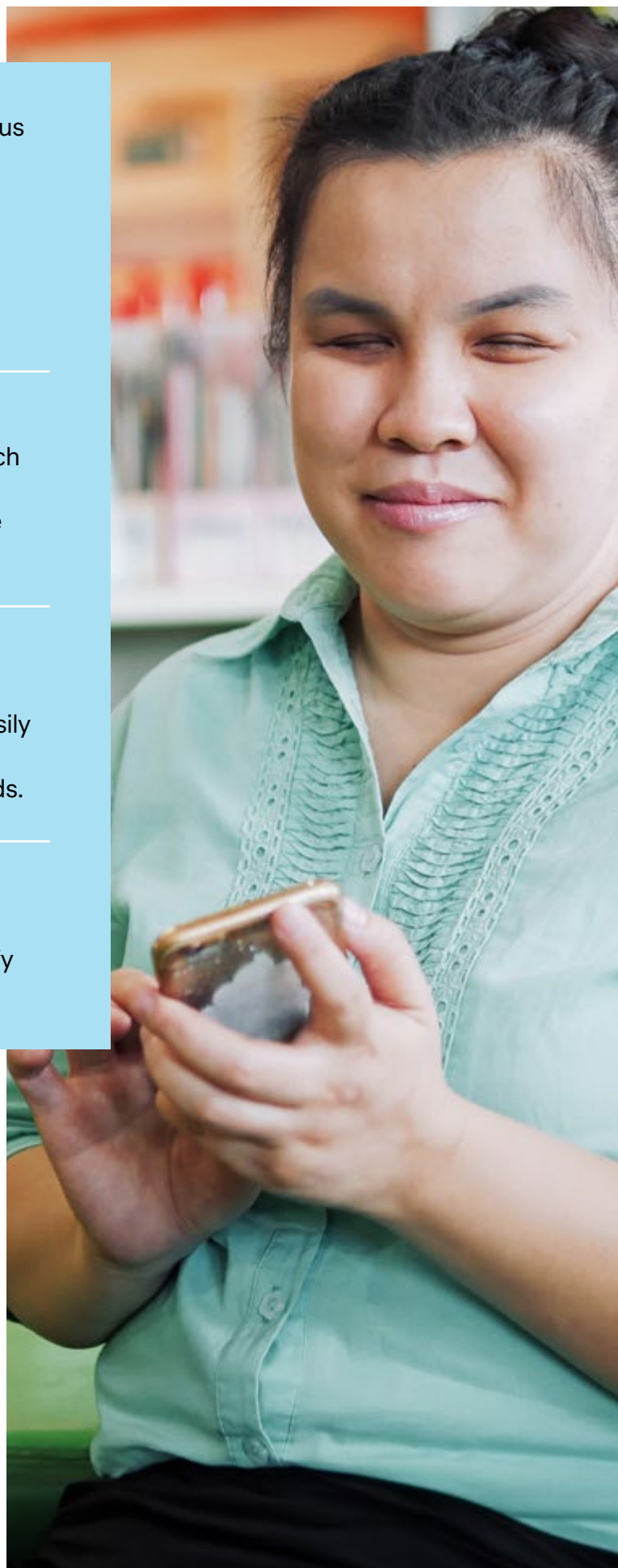
Help customers more easily identify and read key details.

User feedback also guided our choice of the logo colour on the card.

“Our testers told us that they needed to see the bright yellow CommBank logo so they could recognise it as a CommBank card,” explains Melissa.

“User testing with people with lived experience really helped us understand how we could improve the design, and gave us insights in areas which we may not otherwise have considered.”

In addition to our accessibility enhancements, the new cards are made with 82 per cent recycled plastic using post-industrial waste.



# Supporting our communities

## Nicole's story

Nicole Christodoulou has always loved football. The first thing she did after school every day was watch videos of superstars of the game so that she could master the tricks of her heroes. Her dream was to wear the green and gold for Australia as a Matilda.

But 10 years ago, when she was just 21, Nicole experienced a stroke. She spent months in hospital undergoing rehab to learn how to walk and talk again. She struggled to understand how her life would take shape. She was told that she would never finish university, never work full time, and never play football again.

But her motivation through this challenging time was the sport she loved. Nicole had placed a football in her hospital room as motivation to achieve her goals. She took it to her rehab classes and asked her physio to make sure it was there alongside her as she practised sitting up, standing and shuffling around her hospital room.

For Nicole, proving the doubters wrong was important for her recovery.

“Lots of people put me down, told me I would never work full time or finish university,” she says. “But football has given me confidence and played a big role in the improvement of my cognitive functioning, physical health and recovery. Thanks to football, I have finished my teaching degree and I now work full time as a high school teacher. Yes, I did prove many people wrong.”

Nicole made her debut for Australia in April 2022 at the first Women's Cerebral Palsy Football World Cup. Alongside her CommBank ParaMatildas teammates, Nicole achieved her dream of wearing the green and gold. She wants to make sure the team is here for future generations to live their own sporting dreams.



Nicole Christodoulou, CommBank ParaMatilda.

## CommBank has proudly supported the CommBank ParaMatildas and CommBank Pararoos since 2022.

### CommBank ParaMatildas



The [ParaMatildas](#) are Australia's first ever women's national team for players with cerebral palsy, acquired brain injuries, and symptoms of stroke. They made their international debut competing in the inaugural International Federation of Cerebral Palsy Football (IFCPF) Women's World Cup in 2022, in which they were runners-up.



In 2022, they won **Team of the Year with a Disability** at the NSW Champions of Sport Awards.



In 2023, they competed in the first Women's **IFCPF Asia-Oceania Championships (Para Asian Cup)**.

### CommBank Pararoos



The CommBank [Pararoos](#) celebrated their **25th anniversary** in October 2023.



They finished a **record-equalling 11th** in the 2022 IFCPF World Cup.



In 2023, they **ranked 10th** in the world.



In 2023, they competed in the **IFCPF Asia-Oceania Championships (Para Asian Cup)**.



The CommBank Pararoos celebrate after their match against the USA in Gadigal/Sydney.



# Our strategy 2024–2026

## Dignity by Design

CommBank's purpose is to build a brighter future for all.

Aligned to this is the goal we have set through this strategy, which is to design inclusive products, services, experiences and workplaces that provide equitable access and dignity for all our customers, people and communities.

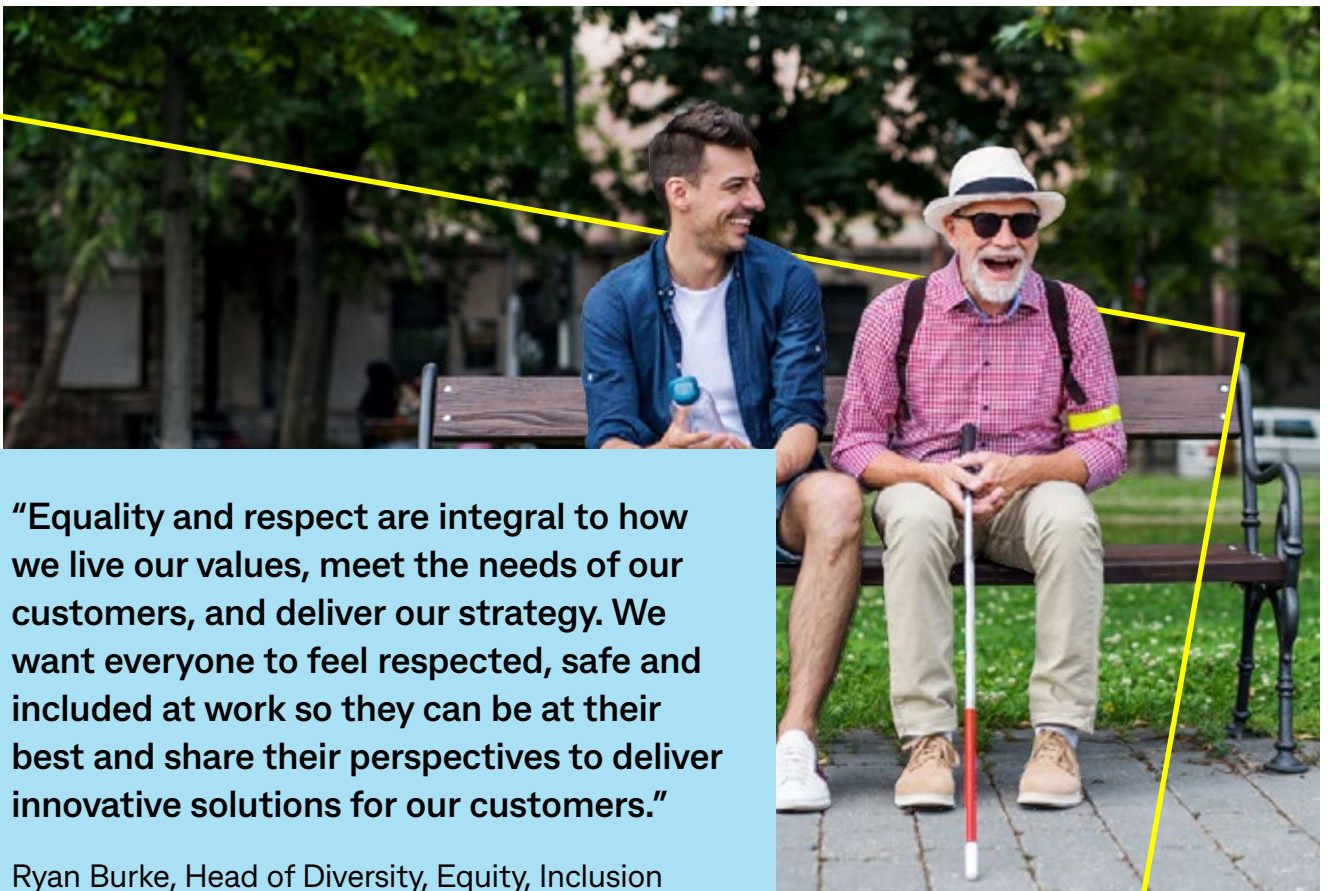
We call this Dignity by Design.

To fulfill this goal, our people must take responsibility for their actions – big and small – to make our business better for everyone.

We recognise the social model of disability. As such, we are working towards changing the environments we create for our customers and people rather than expecting people with disability, carers and those who are neurodivergent to simply adapt.

This means being flexible in the way we use new technologies and being open to innovation.

As a bank, we are shifting our mindset to change how we operate day to day. Because to achieve our goal, accessibility and inclusion can't be just 'nice to have'. Rather, they need to be part of normal business operations, shaping how we design physical spaces, services and our workplaces into the future.



**"Equality and respect are integral to how we live our values, meet the needs of our customers, and deliver our strategy. We want everyone to feel respected, safe and included at work so they can be at their best and share their perspectives to deliver innovative solutions for our customers."**

Ryan Burke, Head of Diversity, Equity, Inclusion

## What is driving our strategy?

According to a [2023 Deloitte Report](#), people with disability are at higher risk of financial insecurity. A contributing factor to this is exclusion from banking services. The impacts of exclusion can be far-reaching, making it more difficult for people to participate in other areas of life too.

As Australia's largest bank, we want to make a difference by designing our products and services to be more accessible and ensuring our people are aware that our customers have different needs. We also know that inclusivity will not happen immediately – achieving it is an iterative process that requires sustained effort and commitment.

## Our human-centred design approach

We developed our strategy using a human-centred design methodology. It was co-created with people with sensory, mobility and cognitive disability, seniors, people who are neurodivergent, people living with mental illness, and carers of people with disability. We also consulted with community organisations and subject matter experts, as well as our own people, including members of our Enable employee network. Together they contributed their ideas, provided feedback and gave us valuable insights and perspectives.

**“In today’s world, change is the only constant. Our approach will be driven by developments in technology, global events and the way people’s expectations and needs evolve.”**

Angela MacMillan,  
Group Customer Advocate

## What people told us

**I want to be able to live and work independently. Give me the tools, agency and flexibility I need to do so.**

"When a document [isn't] working, instead of thinking 'This is inaccessible', I [think] 'I can't see this.'"

**CommBank customer**

"With my condition and caring responsibilities, if I didn't have the flexible hours and working from home, I wouldn't be able to do my job."

**CommBank employee**

"I am older and managing orientation within a digital space is difficult. I often think, 'Oh, where has that sent me? They've sent me a code. The time is running out.'"

**Community organisation**

**I want to be part of an environment where I feel valued, accepted and connected, regardless of my circumstance.**

"I don't know how an interaction with a staff member is going to go, so is it worth the anxiety of disclosing my disability?"

**CommBank customer**

"It's being part of the team, being part of general everyday life and how I ... can take part. It's also not being a burden to others. I don't want to be thinking that other people must work harder just to carry me."

**CommBank employee**

**I want to realise my full potential. I have so much to offer – in the right conditions, I can thrive and contribute.**

"I might be a little bit slower, but if you give me that time and understanding I can achieve my best."

**CommBank employee**

"My condition leads to imposter syndrome. The most stressful thing when struggling with a task for me is: 'Is it me struggling because of my skills or is the task badly designed or explained?'"

**CommBank employee**

**I need to be understood, acknowledged and accepted. My lived experience with disability gives me empathy for others.**

"People are contacting a bank because they need service, and there's usually a time frame around it and other things depending on it that can cause emotional stress. Empathy and patience go a long way when you're dealing with multiple barriers in the background."

**CommBank customer**

"On a positive note, [neurodivergent] tendencies help me empathise with customers more. Because I know what it's like to be misunderstood, I ask a lot of questions and go off script a lot to get context from people I am serving. It makes you hear everything, empathise and treat people with respect."

**CommBank employee**



## Four key themes from our research

### Empowerment

#### Employees want:

- the agency to perform their roles independently
- to choose how they work to enable them to be at their best.

#### Customers want:

- more choice and control over their banking experience.

### Self-actualisation

#### Employees want:

- respect for different needs, rather than special treatment
- small adjustments to the workplace to help them contribute more fully.

#### Customers want:

- appropriate supports based on their level of need.

### Belonging

#### Employees want:

- to be part of the team and contribute to the bank's success.

#### Customers want:

- to be treated fairly and with the same respect as customers without disability.

### Empathy

#### Employees want:

- supportive managers who are willing to go the extra mile to accommodate differing needs.

#### Customers want:

- staff sensitivity to different needs
- to avoid having to repeat requests for adjustments to multiple members of staff.



# Our new strategic framework

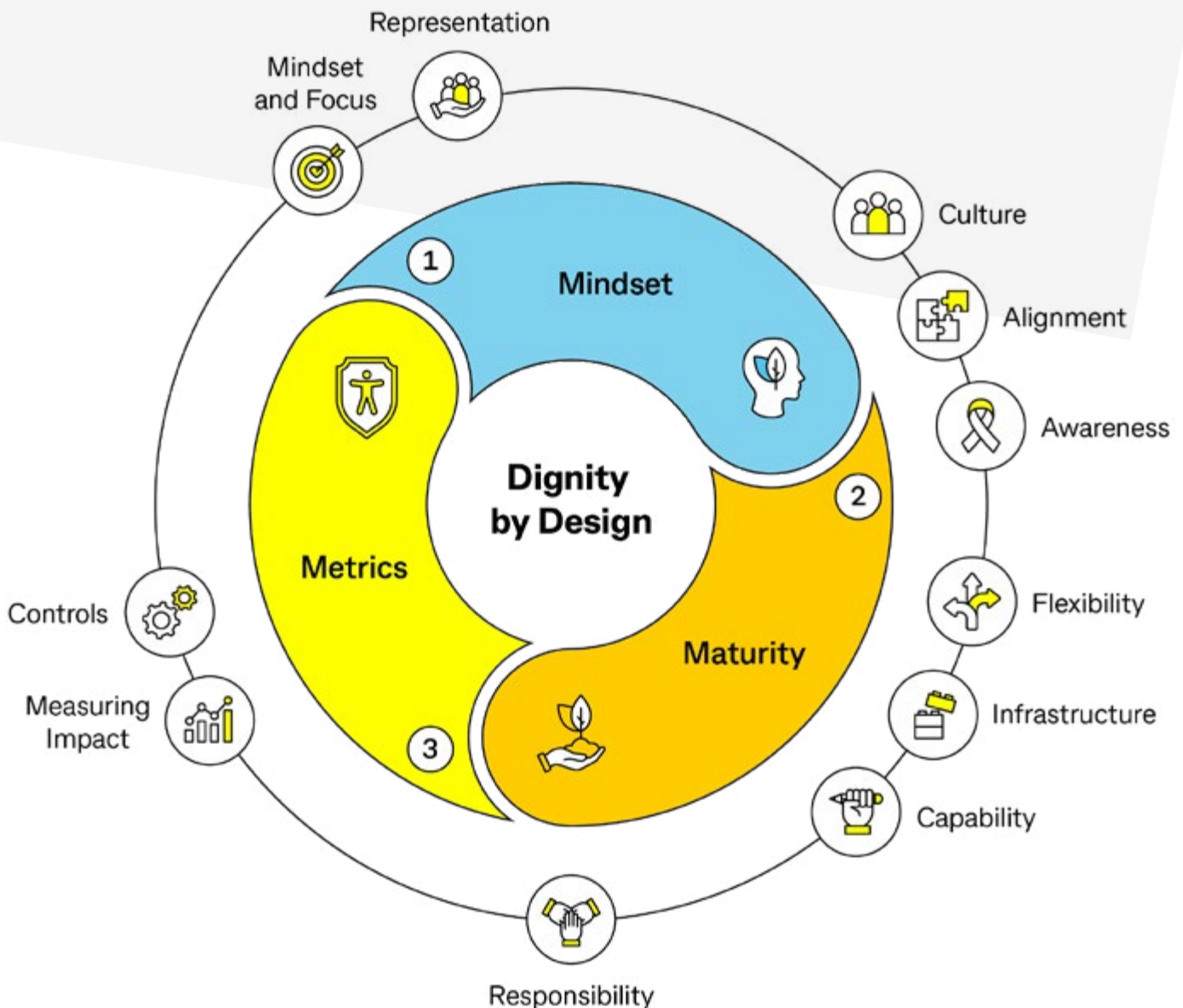
Guiding what we will do and where we will focus our efforts is our new strategic framework, or what we call an ecosystem.

At its heart is our goal: Dignity by Design. Wrapped around it are three core pillars – mindset, maturity and metrics – and 11 strategic focus areas. For each of the elements in the framework, we have defined the future state we want to achieve – as set out on the following pages.

Like any healthy ecosystem, the framework’s strength lies in the interconnectedness of its parts – and their ability to work together and reinforce and support one another.

Each focus area is underpinned by initiatives we are aiming to deliver over 2024–2026.

## Our ecosystem



## Our three core pillars

Each pillar outlines a fundamental component that, when combined, will help us achieve our goal.



### Mindset

#### Setting the right focus

We foster an environment that embodies genuine inclusivity and disability confidence.



### Maturity

#### Enabling good practice

We enable and expect our people to integrate accessibility principles into their work.



### Metrics

#### Holding ourselves accountable

We have appropriate controls and measures in place to safeguard our commitment to accessibility and inclusion.

## Our 11 strategic focus areas

Each area describes where we will focus and helps guide the actions we will take.



### Alignment

We have a common goal of embedding accessibility and inclusion into how we do business.



### Awareness

Our people understand what accessibility and inclusion are, how they relate to disability, and their importance to our organisation. We strive to be a driving force in promoting awareness in the community.



### Capability

We equip our people with the knowledge and skills to achieve accessibility and inclusion. We continue to improve our capability and prioritise creating an environment where accessibility and inclusion are championed and supported by leaders and employees.



### Controls

We have the right governance and controls to achieve accessibility and inclusion in the design and delivery of our products, services and experiences.





### Culture

We foster a culture of empathy, belonging and understanding so that customers and our people feel safe, respected and included.

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### Flexibility

We remove barriers and create experiences that give our customers and people agency, choice and flexibility to interact with us in ways that work for them.

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### Infrastructure

We provide the tools, processes and resources to enable and empower our people to embed accessibility.

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### Measuring Impact

We measure, track and benchmark our impact and progress in accessibility and inclusion. We regularly evaluate what we do to identify and prioritise opportunities to improve across the organisation.

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### Mindset and Focus

We embrace an inclusive mindset and promote the understanding that environments should be designed to meet a diverse range of needs. We are clear and focused on what we need to do to improve accessibility and inclusion for our people, customers and communities.

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### Representation

We are committed to representing the communities we serve by driving disability confidence and representation across our workforce. We recognise the benefits that diverse perspectives and experiences bring to our organisation.

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### Responsibility

Our people recognise that accessibility and inclusion are everyone's responsibility. They understand the role they play in upholding accessibility standards in the interactions they have with customers, colleagues and the community.

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## How we will govern our strategy

A range of initiatives have been developed to support our strategy. To track progress and drive sustainable change we will govern these initiatives through CommBank's approach to Environmental and Social Governance.

Achievements will be reported in our next accessibility and inclusion strategy.





# Contact us

## Feedback, questions and ideas?

If you have ideas on how we can better serve our customers, people and community, we're here to listen.

To provide feedback on our *Accessibility and Inclusion Strategy 2024–2026* or any other accessibility-related matters, you can contact us via:

### Email

[customeradvocate@cba.com.au](mailto:customeradvocate@cba.com.au)

### Mail

Customer Advocate  
Commonwealth Bank of Australia  
Reply Paid 88915  
SYDNEY NSW 2001

*There's no need to use a stamp – we'll pay for the postage.*

Further information about CommBank's Customer Advocate can be found at: [commbank.com.au/customeradvocate](https://commbank.com.au/customeradvocate)



### Access this document in Easy English

An Easy English version of our *Accessibility and Inclusion Strategy 2024–2026* can be found at: [commbank.com.au/accessibility](https://commbank.com.au/accessibility).

## Support for customers affected by domestic and family violence

If you're experiencing domestic or family violence, including financial abuse, you can speak to our specialist Next Chapter team about your financial needs.

Our team has been specially trained to provide confidential support and address the immediate banking needs of individuals whose circumstances make it challenging to have a conversation about finances. That includes circumstances involving mental health, serious illness, domestic or financial abuse, problem gambling or other addictions, homelessness, or other circumstances that may make you feel vulnerable.

You can call the Next Chapter team on 1800 222 387 between 8am and 6pm, Monday to Friday (Sydney/Melbourne time).





# Common terms

Below we have defined common terms used in this document. We acknowledge that people have different interpretations and language continues to change and evolve.

## Accessibility and inclusion

The consideration and incorporation of the needs of people with disability in all areas of an organisation's operations. This means ensuring that people with disability have equal access to employment, training and development, products and services, premises, communication and information communication technology.

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## Access and Inclusion Index

An evaluation and benchmarking assessment created by the Australian Network on Disability. The index gives organisations insights into their strengths and opportunities on their journey towards becoming accessible and inclusive of people with disability. Participation in the index is confidential (AND n.d.).

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## Carers

People who provide unpaid care and support to family members and friends who have a disability, mental illness, a chronic condition, a terminal illness or an alcohol or other drug issue, or who are frail aged (Carers Australia n.d.).

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## Dignity by Design

Dignity is the bedrock of inclusion. Dignity by Design recognises that accessibility must coexist with inclusion. Accessibility without inclusion is not dignified. That's why our goal is to design inclusive product, services, experiences and workplaces that provide equitable access and dignity for all our customers, people and communities.

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## Disability confident

Being disability confident is about being able and willing to effectively manage a spectrum of human needs (Business Disability International n.d.). Disability confident employers understand the benefits that people with disability can bring to their business. They think differently about disability, and have the skills, techniques and confidence to recruit and retain people with disability. They think about the needs of people with disability when designing their products and services, and when creating employment opportunities (AFDO n.d.).

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## Equitable access

In this document, equitable access means:

- 1) providing customers with opportunities and support to enable equal access to our banking products and services regardless of ability, or
- 2) providing supports to our people to fully and equally participate in the workplace.

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## Human-centred design

An approach to problem solving that includes different human perspectives at all steps of the process. Participants actively contribute to solutions rather than simply having their perspectives recorded. The process typically involves observing a situation, brainstorming and conceptualising, and then developing and implementing ideas.

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## Neurodiversity and neurodivergence

Neurodiversity is an umbrella term used to describe the range of differences in individual brain function and behavioural traits, regarded as part of normal variation in the human population. (Merriam-Webster n.d.). Neurodivergence is defined as cognitive functioning which is not considered 'typical'. Someone who is neurodivergent behaves, thinks and learns differently compared to those who are neurotypical. The term neurodivergent includes people with autism, ADHD, Tourette's, dyslexia and a range of other neurodiverse conditions. (Exceptional Individuals n.d.). In this document, neurodivergence has been discussed separately to disability based on the preferences of the people with lived experience we consulted during the research phase.

## Social model of disability

According to the social model, 'disability' is socially constructed. The social model sees 'disability' as the result of the interaction between a person's impairment and an environment filled with physical, attitudinal, communication and social barriers (PWDA n.d.).

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## United Nations Convention on the Rights of Persons with Disabilities (CRPD)

Article 12 of the CRPD outlines 'Equal recognition before the law'. Part 5 states that "subject to the provisions of this article, States Parties shall take all appropriate and effective measures to ensure the equal right of persons with disabilities to own or inherit property, to control their own financial affairs and to have equal access to bank loans, mortgages and other forms of financial credit, and shall ensure that persons with disabilities are not arbitrarily deprived of their property" (UN 2006).





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