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Who's in? Analysing the impact of inclusive communication policy and processes on organisations seeking to include diverse publics

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Certificate of Original Authorship

I, Vicki Anne Bamford declare that this thesis, is submitted in fulfilment of the requirements for the award of Doctor of Philosophy, in the School of Communication, Faculty of Arts and Social Sciences at the University of Technology Sydney.

This thesis is wholly my own work unless otherwise referenced or acknowledged. In addition, I certify that all information sources and literature used are indicated in the thesis.

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Abstract

Who's in? Analysing the impact of inclusive communication policy and processes for organisations and their diverse publics

Many organisations acknowledge the need to include diverse publics, but most struggle to do so (Edwards, 2017, p.2, Thill, 2015, p.3). A case study approach investigated one organisation from each sector of not for profit, government, and for profit based on a reputation for including diverse publics. Each organisation's inclusive policies and processes were analysed and their publics experience of being included reported. Data were collected from 2017 to 2018 from staff and their customers with disability and from a Non-English Speaking Background (NESB), and industry reports and documentation were analysed from 2008 to 2019 mapping their historical position to include these publics.

This study found a mismatch between the diverse publics' norms of culture, to share meaning (Kim, 2001) and the organisations' norms of practice, to share communication processes to engage and it created a barrier to inclusion. Gaps in communication processes prevented effective feedback mechanisms to inform change; the prioritisation of business goals over mission statements supporting the values of inclusion; and the lack of relationships with advocacy groups able to intercede for NESB publics. Staff with lived experience of disability or as a NESB shared some of these publics' norms of culture but they were unable to use this understanding to influence the organisations' norms of practice to be included (Kalowski, 1996, Davis, 2013).

The study demonstrated that strategic communication processes could improve inclusion of diverse publics. Thus, a key conceptual contribution is the observation that embedding strategic communication processes to build on the ideological framework of communicative action (Habermas, 1981), to support an open exchange of ideas for diverse publics, leads to new knowledge because understanding and meaningful engagement is the aim.

Four significant implications for practice were identified: establishing feedback mechanisms on inclusion is important for understanding current needs and promoting future services; communicating with diverse publics requires specialist skills; programs of education for strategic communicators need an emphasis on establishing processes that bring together the norms of culture of diverse publics with the potentially constraining norms of practice of organisations; the changes required in organisations to ensure that diverse publics are included need to focus on access, requiring the implementation of culturally sensitive strategic communication processes.

This study's originality lies in its close study of mainstream organisations widely regarded as industry leading in relation to their inclusive approach to diverse publics. It revealed practices that covertly excluded diverse publics, and identified staff were unaware.

Chapter 1

Introduction

Beatrice is a migrant from Spain who has lived in Australia for more than 20 years. Recently she rang her phone company, Oz Tel, to inquire about a basic service. Beatrice is fluent in English and speaks with a Spanish accent. Oz Tel's automated telephone system could not understand her request and steered her through additional processes in order to finally achieve the outcome she needed. Beatrice says it was a simple issue that should not have taken as long as it did. She felt frustrated and devalued as a customer of Oz Tel, and as a citizen of a multicultural country where 'everyone has an accent'.

Nicole is an Oz Tel customer with low vision. She always requests a printed bill because she relies on specialist software to read information. She knows it is her right to have a printed bill at no extra cost, but recently she was charged for it. She rang to complain, having to explain the company's own policy to the telephone operator. She was then sent her bill in braille, despite never having asked for this, and not being able to read braille. She says she has to continually follow up with Oz Tel to have her bill sent in the correct format, and has her service cut when she fails to pay. She is planning to take her case to the NSW Ombudsman to resolve the issue.

These two cases show the day-to-day difficulties experienced by members of diverse publics in accessing basic products and services.

Introduction

This study investigates how people with disability and people from a Non-English Speaking Background (NESB) experience exclusion from service provider organisations when they have a right to access. Although these two publics comprise a substantial

proportion of the national population, with 17.7% of the Australian population identifying with disability and 27.6% born overseas (Australian Bureau of Statistics 2015-2021), they often report experiencing difficulties with access to basic services (Thill, 2015, p.3, Jakubowicz, 2022). Even organisations that present themselves as committed to inclusion can inadvertently exclude those whose needs may vary from those of mainstream communities (Hyland-wood et al., 2021, p.7). Such organisations may remain oblivious to this exclusion because they do not have in place mechanisms to receive feedback from diverse customers to inform their practices (Hyland-wood et al., 2021, p.8). And even when they do have variations available for diverse customers, for example, translations or printed or audio versions of information, customers may not be aware of them because of inadequate communication from the organisation (Dawson, 2018, p.738).

Engaging with diverse publics is a specialist skill and organisations may have a limited number of staff with expertise, or the expertise may only be accessible for particular publics they have decided require attention as demonstrated by the processes offered (Hyland-wood et al., 2021, p.8). Bias occurs when shared norms privilege the publics who share them, but diverse publics who engage differently are easily excluded (Campbell, 2009, Garland-Thompson, 2005). It may be compliance criteria are limited or that an organisational goal and agenda have skewed attention to the norms of the organisation and they have therefore assumed inclusion has been achieved (Davis, 2013, Kim, 2001). This process sidelines the expertise and experience of diverse publics because their feedback is not captured or included (Ratcliffe, 2005). Unjust patterns of value and attention afforded to publics more closely aligned with the organisation require attention if diverse publics are to be included (Thill, 2018, p9.)

It is up to the organisation to include all their publics given they are equally entitled to a good service, however, organisations can assume the processes they have developed are adequate unless they have feedback that indicates otherwise (Hyland-wood, et. al, 2021, p.7). Diverse publics can find it harder to provide feedback because the system offered is inaccessible or not promoted to them, so it is important organisations develop a purposive communication system to gather feedback from their diverse

publics to inform their communication processes (Pereira and De Abreu Figuero, 2020, p.61).

The catalyst for this research is my experience as the daughter of a profoundly deaf mother for whom I became a translator from an early age. I am also the primary carer of a sister with an intellectual disability, on whose behalf I seek equitable access to services on a daily basis. In my personal experience, I have also witnessed that people named and positioned as a minority coming from a Non-English Speaking Background (NESB) face similar, and often greater, discrimination to that faced by people with disability. This is supported by Kaczorek, Wadiwel and Cooper (2010), whose report for the National Ethnic Disability Alliance (NEDA) found that "all people with disability face barriers to social participation- access to employment, technology, social activity and economic wellbeing- however, people from NESB countries are likely to face deeper forms of marginalisation" (2010, p.7) given culture and language may not be shared and the barriers to inclusion can be hidden.

Thus, the origin of this study is in my lived experience, particularly my work as an advocate. I undertook this study because I find it unreasonable that these two publics, people with disability and those from a non-English speaking background, who represent a large number of people in Australian society (Survey of Disability, Ageing and Carers, 2016, Ho and Jakubowicz 2013, p.23), are excluded or provided with lesser opportunities, and the value they bring is not recognised (Tan, 2003, p.108). I was also influenced by my professional self, the strategic communicator, as in part I wanted to explore what it means to be named a minority from the perspective of managers of organisations whose stated mission is to engage with diverse publics and publics who want to be offered inclusive services.

By taking Habermas' communicative action approach I was able to theorise the relationship between organisations and their diverse publics to move beyond the functionalist approach which has been proven to be limited regardless of its focus on two-way engagement (Heath, 2009, Taylor and Kent, 2014, Edwards and Hodges, 2011, Macnamara, 2021, p.67), to focus on more meaningful opportunities for

authentic exchange. That is, extending debate beyond a single "market focus" of goal orientated engagement, to one that "builds cooperation" through exposure to different ideas and values that can lead to an authentic exchange and shared decision making (Habermas, 1994, p.9). This approach to engagement differs from Dozier, Grunig and Grunig's historical prioritising of dialogic engagement as symmetrical communication. Their approach, which was so influential when it was first presented, assumes the flow between organisation and stakeholder is equal yet fails to acknowledge bias is held according to the organisation's ideology (Edgett, 2002, p.3). Simultaneously, stakeholders may be listened to and participate, operationalising a two-way exchange as noted in normative theories, according to Macnamara, but in reality, this symmetrical communication is rarely practiced (2016, 2019). The use of Habermas' communicative action to theorise market-based approaches of public relations and analyse complex interactions with society, not merely focussed on accelerating an economy, deepens thinking about inclusion (Demetrious, 2022). This approach to understanding communication between organisations and their diverse publics through "co-operative negotiation … " (Johnson, 1991, p.184) may be regarded as idealistic but it is essential for engaging meaningfully with a range of stakeholders and publics.

Stakeholder engagement to achieve real dialogue as opposed to manipulating publics to engage for organisational success must be purposive according to Freeman (1984, p.25) and is important for diverse publics who may lack the agency to engage. Stakeholders, however, can fail to be identified if they are outside of organisation-initiated dialogue (Hughes and Demetrious, 2006, p.100). Thus, a broader identification of publics, a conceptual innovation introduced by Grunig (1978), to expand options for collaboration and partnerships both within and external to the organisation is essential. The unthinking use of stakeholder engagement reinvents traditional power relationships between organisation and stakeholders in the guise of creating proactive and interactive relationships (Hughes and Demetrious 2006, p.100). Nevertheless, all organisational publics are stakeholders and communication professionals must think about engagement that extends beyond a narrow set of publics and Key Performance Indicators (KPIs).

I took a strategic approach to communication with diverse publics to prioritise attention to their access needs (Hallahan, Holthausen, van Ruler, Vercic, and Sriramesh (2007). A strategic approach allows communicators to provide information in a form that is effective for specific publics rather than assuming everyone will have access to the general information distributed (Vardeman-Winter, Jiang and Tindall, 2014, p.238). It requires communicators to understand their publics' access needs by collecting feedback and using it to inform information delivery (Ratcliffe, 2005).

I take a public communication approach to my analysis of the interplay between publics and organisations because this approach openly seeks opportunities to engage broadly in a mediated, politicised public sphere, rather than public relations which seeks to control the public to achieve business goals (Demetrious, 2013). Participants are "empowered to think and act" according to Demetrious, (2013) and engagement recognises a broad range of publics including 'marginalised' replacing the 'functionalist and liberal pluralist idea of public relations" according to Macnamara (2013, p.145).

As an advocate, scholar and professional practitioner, I understand inclusion as operating at different levels. Firstly, as values held and expressed through legislative frameworks to eliminate discrimination in society; secondly as the way values permeate through vision and mission statements reported by goals and objectives in organisations; and thirdly as a personal commitment to equality and fair play. By drawing on the values underpinning inclusion as part of a strategic communication process at these levels, I am uniquely positioned to be able to identify how it manifests and how marginalisation occurs.

Understanding Key Terms

Inclusion, Social Exclusion and Marginalisation

This study seeks to understand marginalisation and the practices that lead to it by identifying engagement practices in organisations that provide products and services to diverse publics as well as to the general publics. Dobusch identifies the difficulties with the term inclusion, noting that it is implicitly referenced but rarely explicitly

addressed (2014, p.221). Social inclusion, and its pairing, social exclusion, are relatively recent concepts, as the United Nations has identified (UN 2016, p. 18-19), but in the less than 50 years since the phrase 'social exclusion' was first used in a policy context, these three terms, inclusion, exclusion and marginalisation, have become significant in the moves towards an equitable society. The UN defines social inclusion as "the process of improving the terms of participation in society, particularly for people who are disadvantaged, through enhancing opportunities, access to resources, voice and respect for rights" (UN 2016, p. 17). It is acknowledged as an aspirational goal. This study aims to improve participation in society by taking a strategic perspective to purposefully identify diverse publics and their access needs so they can be addressed and so that diverse publics are able to engage more fully in society. It is a deliberate move to change the landscape by increasing the profile of diverse publics as one of many publics with a right to be acknowledged and included.

What constitutes exclusion is more problematic, with no agreed definitions. In Australia, exclusion is often linked with discrimination (AHRC, 2022), making legislation such as the Disability Discrimination Act (1992) an important tool in achieving inclusion. However, the Act does not achieve human rights measures beyond addressing discrimination. Former Human Rights Commissioner, Gillian Triggs argues there is a disconnect between having a policy to address exclusion and the act of inclusion. Engagement with diverse publics can be hard to achieve without experienced communicators or advice from people with lived experience informing them (2013). For example, the Racial Discrimination Act (1975) does not address the exclusion of people who do not speak English or who are culturally diverse. Even though the act is a tool to prevent discrimination, these attributes are not included in their measure of success. The "inclusive organisation", by acknowledging a lack of awareness and stereotyping among staff, is more aware of inherent power relationships than implicit "happy ever after" stories that simply claim that difference is valued (Dobusch 2014 p. 230). In many organisations, the principles of access and inclusion appear to be prominent, but success is measured according to economic markers, diminishing the value the organisation has placed on inclusion.

Organisations often claim to consider the particular requirements of diverse publics, using the term "inclusion" or "inclusive". However, practices of inclusion will lead to significant social change, which can be threatening to existing power structure. Therefore, as Armstrong, Armstrong and Spandago found in education, such threats result in "blurring the edge" of social inclusion policies for a "feel good" process that no one can be opposed to because it means nothing (2011, p.29). Organisations often work with weak or vague definitions of inclusion. In this context, organisations that are recognised as being inclusive are characterised by explicit efforts geared towards change, especially in long established societal inequalities. All organisations must work within the laws, but some will take up the challenge of providing products and services for marginalised groups.

By the same token, moves towards inclusion create exclusion for those unable to engage with organisational processes (Dobusch, 2015, p. 130). Participation is affected by a range of factors, including personal circumstance such as income, employment, education and health care (Goggin, 2009). However, an important factor in the balance between inclusion and exclusion is the effect a lack of agency creates for some people in having their rights recognised. This includes the right of privileging their voice so it is valued (UN, LNOB, p.18). Goggin and Newell go further, advocating for exploring norms of the everyday, as mutually understood ways of engaging for rethinking access, rather than power-loaded notions of inclusion across marginalised groups of citizens (2005, p. 72). These researchers argue that inclusion should be universally offered rather than offered only when aligned with a marginalised group. That is, experiences that build understanding need to be shared rather than those that focus on one group obtaining better skills to communicate with the other.

Engagement and Access

From a strategic communication perspective, engagement is an essential tool for achieving inclusion (Johnston and Taylor, 2018, p.1). Engagement is a multi-layered process. Organisations working with a diverse range of clients or publics require knowledge of publics and strategies for communication that empower these publics to

connect with the organisation (Edwards, 2018, p.5). This process of empowerment gives people agency. Ideally, engagement should be the result of co-creation of information that is mutually shared. Through such co-creation, the organisation and their publics can learn about each other to find mechanisms for collaboration to share meaning. Key skills in engagement are active listening, problem-solving and relationship management. A significant aspect of relationship management is the management of expectations. People with disability, for example, are likely to be aware that they have rights under the Disability Discrimination Act, and to have an expectation that those rights will be upheld (AHRC, 1992). Relationship management must include mechanisms to secure feedback to underpin a deep relationship of trust (Bruning and Ledingham, 2000).

Access, however, is both a legal right and a moral right for diverse customers of organisations according to legislation, imbedded in societal expectations found in organisational values of equity, equality, social justice and human rights as outlined in UNESCO's definition of social inclusion (Triggs, 2013). An obligation to service customers may be in place but organisations can fail to be aware diverse customers engage differently and miss connecting (Thill, 2015 p.40). Access is not equally available because legislation is not equally applicable for all diverse publics. For example, people with disability have a process to review access against whereas people from an NESB do not unless they identify under a category that measures access (Chauhan, 2020, p.1). For example, the Racial Discrimination Act (1975) measures complaints not access or inclusion (AHRC, 2020, p.8). The process prevents customers right to access being achieved. Conversely engagement for people with disability is set out in the *Disability Inclusion Act 2014* and organisation's Disability Action Plan (AHRC, 2020, p.7). The process sets expectations of inclusion and can affect satisfaction if not achieved and it can identify communication gaps for people who have access. However, many people with disability fail to have the access they need to be included because their access needs are not recognised (Thill, 2015, p.3).

Likewise, access is a moral right of diverse customers reflective of societal expectations to include but the values held by the organisation may not be aligned with their

strategic communication process. As a consequence of not having a process to evaluate inclusion, the organisation is unable to report success or identify gaps. The diverse customers who are reliant on having a process to connect are excluded and the organisation can be unaware (Harrison, Walton, Chauhan, Manias, Chitkara, Latanik and Leone, 2019, p.1).

The organisation's ability to operationalise their vision and mission to include as measured by their goals and objectives is imperative for them to describe success or otherwise.

Access is a complex process for organisations to facilitate. It has several elements to it, including: promotion, accessibility and detailed understanding of the public's communication styles based on their norms of culture. Thus, access can be said to exist when an environment is established that allows people to engage with an organisation. For people to be able to engage with an organisation, they need to be aware that the organisation has developed a variation to suit their particular requirements, and how to access them. In other words, organisations need to promote the services they provide (Gadamer, 1989, in Macnamara, 2016, p.36). Without accessibility, however, the person will not be able to use the service. Accessibility refers to the communication processes that meet the requirements of the particular person, for example the provision of a bill sent in Braille for people with low vision or plain English descriptions of policies and services for people with low literacy. To achieve access, organisations need specific policies to exist within organisations and staff that have an understanding of the complexity of communication. This includes understanding cultural norms. In working with diverse publics, organisations need to establish services that vary from those offered to the general public. However, just establishing variations for diverse publics does not in and of itself lead to access. Internal communication processes should ensure that staff are aware of variations that can lead to inclusion, as without this second level of processes, diverse publics remain excluded from the level of service that others receive. Despite the implementation of these processes, the organisational provision of this environment only becomes effective when diverse publics have agency. Agency can be described as a situation

where there is an equal exchange of information on needs, expectations and services (Zerfass, Vercic, Nothhaft and Werder, 2018m p,488).

The two processes of engagement and access are essential to inclusion of diverse publics. Engagement emphasises the importance of agency for diverse publics and access focuses on the organisation's responsibilities to ensure that its staff are skilled in communication and trained in the details of variations for those with particular service requirements.

Publics and their labels

For the purposes of this doctoral research, I acknowledge society's role in disabling people by not accommodating needs for equal access (Ellis, Kent, Hollier, Burns and Goggin, 2018, p.95) and I refer to two publics of focus as diverse publics. They are selected because they represent two groups of people who are entitled to the same provisions because we are all diverse or unique. I do this to demonstrate the value of diversity to create innovation and build ideas, not to dilute an individual's value by saying they are diverse and regarded as 'other' (Hall, 1997). Publics need to be named for attention but the process essentialises the complex, leading to marginalisation. Marginalisation is further perpetuated by an assumption the group is homogeneous and receptive to information (Hughes and Demetrious, 2006, p.96), failing to recognise norms may not be shared and the process reduces these publics agency (Davis, 2013, Dawson, 2018, p.775). I argue that a better way of identifying publics is needed. I promote the term 'people with disability' as one of many norms that deserve attention. By placing disability prominently, I aim to counter Mitchell and Synder's (2013) argument that 'people with disabilities are treated as exceptions valorising able-bodied norms of inclusion as naturalised and qualified citizenship' (p. 47). I use the term Non-English Speaking Background (NESB) to refer to people whose first language is not English. I use NESB instead of Culturally and Linguistically Diverse (CALD) in line with Wadiwel and Cooper's argument that 'generality of culture and language potentially diffuses the social and political challenges faced by racialized minority groupings, given we are all culturally and linguistically diverse' (2013, p.96).

While I acknowledge the Department of Immigration and Multicultural Affairs standards' preferred term is CALD for data collection (2001), the focus of my work is communication. I argue that understanding is impeded because written English is used to promote language variation and accents of English speakers are frequently misunderstood. For this reason I support Sawrikar and Katz's claim that neither term is complete and that further work needs to be done (2009). However, I do use these terms, CALD, NESB and Language Other than English (LOTE) in the findings of this study in line with each organisation's use of the terms. In the same way, 'publics' is commonly referred to as a group of people who share an interest and know about each other, increasing their power to act (Dewey, 1927, Hallahan, 2007, Smith, 2013). However, organisations do not consider the people they work with as publics. From a strategic communication perspective and therefore, when reporting on the case studies, I have used the term used by the organisation. These terms reflect the relationship from the goals and conventions of the business sector to which the organisation belongs, that is, not for profit, government or for-profit. Therefore, an organisation's public is referred to as member, client or customer, accordingly.

Significance of the Study

This study addresses a larger philosophical question about who is valued and how their value manifests through access opportunities to engage equally in organisations and society at large. However, my concern here is not directly with that larger question, but rather with a question based in the professional practice of strategic communication. My pursuit goes beyond 'tick the box' compliance measures to meet anti-discrimination legislation or minimum requirements of a strategic, or access and inclusion plan. I want to understand the barriers to inclusion for diverse publics and why they occur.

This study is significant because it contributes to communication theory and strategic practice in six important ways, which are set out below.

Firstly, the study highlights the under-researched link between strategic communication and marginalisation of publics. The literature has little focus on this

key relationship, despite a gap expressed by numerous scholars and identified in case studies (e.g. Vardeman-Winter, Jiang 2014, Atkin and Rice, 2013). From a professional practice perspective, this is an important issue because the purpose of strategic communication processes is to ensure engagement between an organisation and its publics. A focus on this link is vital given that explicit strategic communication practices assume connections have been made. However, these practices do not attend to misunderstandings that are not named and therefore cannot be addressed. Therefore, implicit communication processes are more important for diverse publics.

Secondly, this study showcases the real-life experiences of managers and of diverse publics. There is a large literature on the experiences of diverse publics and of developing diversity within leadership teams but there is little attention given to the relationship between managers and diverse publics. The bringing together of these perspectives is significant because it extends the practices of listening to hear a range of voices from people positioned in the centre and periphery (Miles, Huberman and Saldana, 2014) to theorise relationships for attention. Few studies include diverse publics who do not have a strong link with the organisation to understand how their experiences lead to lesser engagement.

The important role that organisational structure plays in marginalisation is demonstrated by this study and its significance therefore contributes to the field of strategic communication. This was identified by an analysis of the reporting lines linked to strategic markers that measured success. The markers influence organisational priorities to determine which processes are prioritised and resourced in an organisation and which are not. A concern with organisational structure is rarely found in the literature of strategic communication.

Fourthly, this study questions notions of best practice. The three case studies were selected because of their accepted position, in professional terms, as models of best practice. Models of best practice are important from a professional perspective because they give examples and ideas that prompt development in the way that professional practitioners work. They also provide resources for programs of study and

training. This study shows that even organisations that have a reputation for best practice are limited by an external framing of inclusion in terms of compliance. Thus, the study is significant because it challenges practitioners to consider who the target of their practices of inclusion are.

This study identified that inclusion is measured differently for people with disability and people from NESB and is underpinned by differing processes of engagement and communication. There is an assumption in the literature and in practice that diverse publics are "minorities" and that everyone in a minority category is given equal treatment within that context. The study questions that assumption.

Finally, the study emphasises the importance of the link between voice and agency, not only from a scholarly perspective, but also from the perspective of professional practice. Voice, the ability to articulate expectations and experiences, is important. So too is agency, the capacity to interact with the organisation and have it take account of these expectations and experiences. If the link between these concepts is not well understood, the professional practice will be weak and ineffectual. Consequentially, the professional ideal of collaborating with diverse publics to co-create inclusive strategies will never be achieved.

Summary of the Chapters

The Literature review, **chapter 2,** applies theories of communication and organisational communication to interpret the exchange between people from diverse backgrounds and their service provider organisation. These include Habermas's theory of communicative action (1987), Davis's theory of normalcy and norms of practice (2006), and Hallahan, Holtzhausen, van Ruler, Vercic and Sriramesh's theory of strategic communication (2007). Voice and listening are identified as key communication processes essential for engagement and feedback. The marginalising effects of weaknesses in these processes are identified. The chapter concludes by identifying gaps in the literature related to strategic communication processes and the marginalisation of diverse publics.

Chapter 3, methodology, is informed by my position as a communication specialist for government and for-profit clients, as a university lecturer, and a white, working class advocate for people with disability, with some lived experience in this area. This positions me as both an insider and outsider. The study takes an interpretivist approach using a qualitative methodology. I adopt a multi case study method to collect emerging interpretations from information constructed by people as they engage with the world (Yin, 2009). Data includes industry reports, reports from the case study organisations, interviews with employees and with diverse publics based on three levels of engagement as well as observations. A priori and open coding have been used to analyse the data and identify key themes. The chapter concludes with a consideration of criteria for quality.

Chapter 4 is the first of the Findings chapters. It presents the not-for-profit case study, 'Consumer Advocacy Australia' (all organisation names are pseudonyms). It focuses on the impact of the organisation's norms of practice for consumers when their norms of culture are not shared. This case study found a culture of inclusion challenged powerful barriers that established a "hegemony of normalcy" (Davis, 2006). Nonetheless effective engagement with actively engaged partners blinkered exclusion of diverse consumers who struggled to engage.

Chapter 5, the second of the Findings chapters, presents the case study of a local government organisation, 'Metro Council'. It focuses on the politics of listening. This case study found the established structures for consultation operate unevenly. It also found that the inclusion of some privileged diverse members, such as those included in advisory committees, could mask the continued exclusion of more disengaged community members.

Chapter 6, the third of the Findings chapters, presents the case study of the for-profit organisation, 'Oz Tel'. It found that a mismatch between the strong mission statement and weaker strategic communication processes, as well as the mismatch between norms of culture and norms of practice, meant that the organisation was more likely to focus on compliance with the legislation rather than providing services that genuinely

include diverse publics. In both Metro Council and Oz Tel, publics with disability had better access because they were more likely to conform to organisational frameworks for engaging with customers, as opposed to LOTE customers. This finding confirms Campbell's argument that people are reduced when they don't fit a particular frame (2009).

Chapter 7 presents a discussion about the exemplification of inclusion through norms of practice and norms of culture to demonstrate values held as manifest through relationships and processes that create inclusion for diverse publics. Exclusion of diverse publics occurred when meaning was not shared, and organisations simply assumed their communication was effective. This study found inclusion was only possible when feedback was collected from people with lived experience of diversity, and when it was applied strategically to promote access to engage.

Chapter 2

Literature Review

Introduction

This chapter will do three things: introduce the current climate for inclusion, review the literature and establish the gaps in the literature.

In the current climate there is an expectation that people will be included in society because it is a human right "to inherently value each person regardless of their background, where they live, what they look like, what we think or what we believe" (Australian Human Rights Commission, 2022). This chapter begins by briefly re-iterating the societal context of rights, legislation and government action to ensure that minorities, particularly those living with disability and to a lesser extent those from Non-English Speaking Backgrounds, are treated equally in Australian society.

The literature review draws on scholarship from several areas to respond to the research question that asks "who's in?" and analyses the impact of inclusive communication policy and processes for organisations seeking to include diverse publics. They include the strategic communication literature's impact on organisational communication; the literature on norms of practice and the impact of norms of culture, aspects that covertly regulate much of human and organisational behaviours; and the literatures focussing on diverse publics as people with disability and people from a Non-English Speaking Background (NESB), their entitlement to inclusion and the practices that often leave them excluded in society. This literature review is not presented in separate parts, it is presented to show the complexity of the area under investigation and the importance of bringing the four areas together to address organisational practices and the implications these have for exclusion of minority publics.

I review communication theories to identify their role in identifying power relations and their impact on organisations and their publics to convey information to engage their publics, particularly their diverse minority publics. Next, I review literature on the norms of practice and norms of culture and how they conceptualise the inclusion of diverse publics named and positioned as minorities for attention. Finally, I explore the literature of access and inclusion from a strategic communication perspective, introducing the implications for the diverse publics of these organisational processes. This final part is set out in three sections, covering organisational vision statements; setting and measuring of goals and objectives; and the processes used in working towards the engagement of these publics.

The final part of the chapter identifies the gaps in the literature that this study will address.

The current climate of inclusion

UNESCO defines social inclusion where every individual has an active role to play to uphold values of equity, equality, social justice, human rights and freedoms; as well as principles of tolerance; and an ability to embrace diversity (Triggs, 2013). Including this contextual material is important for this study because the scholarly literature draws on these definitions and concepts. According to Triggs, social exclusion limits those rights and there is a link between discrimination and social exclusion that needs to be explored. Legislation to guide inclusive practices of organisations is based on societal expectations of inclusion and their link to organisational communication. It is achieved when the organisation's communication policy guides engagement for managers to structure processes to meet legislative protocols of inclusion. The obligation is a positive move for organisations and their publics, but it means an effective communication process must be in place to recognise and accommodate those who do not share equal access.

Legislation guides processes to manage contestations around the rights of people to receive equal treatment. In Australia, legislation includes the *Australian Human Rights Commission Act of 1986* and extends to the *Age Discrimination Act 2004, Disability*

Discrimination Act 1992, Racial Discrimination Act 1975 and *Sex Discrimination Act 1984*. These Acts provide a process to address discrimination. However, as Australia does not have a Human Rights Act, former Human Rights Commission President Gillian Triggs (2013) argued that there is a disconnect between the policy and the act of inclusion.

In a 2012 review of social inclusion in Australia, Patricia Faulkner, Chair of the Australian Social Inclusion Board, agreed that 'while Australia is a prosperous and thriving nation, there are still too many people being left behind'. Faulkner argued (2012) that the act of exclusion diminishes the Australian community, and she called for greater focus on those left out, especially people with multiple and complex disadvantage. Social inclusion in Australia has been tracked since the Social Inclusion Board's inception in 2010 and it is interesting to observe changes in attitude to people from different cultures as measured by the Scanlon-Monash Index (SMI) of Social Cohesion, which worsened between 2007 and 2011, arguably a consequence of a change in immigration policy (Faulkner, 2012). Recently, the SMI reported a decrease in negative views on multiculturalism from 30% to 10% but it identified discrimination was highest for NESB people (SMI, 2021, p.12). In response to a question about experiencing discrimination' 11% of Australian-born NESB people said they had experienced discrimination due to skin colour, religion, and ethnic origin, as had 12% of people born in English-speaking countries, and 38.1% of people born in a Non-English Speaking (NES) country (2021 p. 13). This played out through the lack of policy attention given to NESB publics during the pandemic where poor communication resulted in inequitable access to services, social isolation and information and created fear, uncertainty, and anxiety (2021, p.15). The attention by the Commonwealth government has diminished over the past thirty years where once it was the focus of all organisations and had compliance criteria to report against. It is now up to the Australian Human Rights Commission to monitor inclusion via complaints about racism. The shift has created a void that prompted Andrew Jakubowicz to argue for a Multicultural Act to support people from NES countries living in Australia who are not getting the information they need to survive, let alone thrive (Jakubowicz, 2022). He acknowledges that state level support is provided, but a gap at the Commonwealth

level for establishing and monitoring practices across all service provider organisations exists. Compliance measures can be punitive but without them, minorities risk receiving no attention.

A new Australian Cohesion Index (ACI) was established in 2021 and reports against core dimensions of social inclusion, namely, ideational, behavioural and distributive characteristics (Scanlon-Monash Index, 2021) These can be identified in this study to compare the offer with the reality of inclusion for diverse minority publics. The ideational is intangible, subjective, aims to share values to create respect, build trust and a willingness to cooperate (Schiefer and Nott, 2017, p. 22) and can be identified through the informal relationships built. Behavioural characteristics lead to action from a political, social, network and mutual goal perspective, reflecting the organisation's offer of inclusion, and distributive includes the physical, economic, educational, social and cultural resources needed to access a good life (p. 22).

Similarly, the Australian Human Rights Commission (AHRC) monitors discrimination against people with disability. Of the discrimination complaints made to the AHRC in 2019-2020: 11% were about human rights; 7% age discrimination; 17% race discrimination; 21% sex discrimination and a whopping 44% disability discrimination (AHRC, 2021, p.8).

The AHRC describes disability discrimination beyond the physical and extends its focus to include attitudes and behaviours in society. It monitors complaints but also monitors adherence to Disability Action Planning (DAP), a process organisations develop to address discrimination in the workplace. By developing and registering a DAP, organisations can map compliance with the Disability Inclusion Act (2014) and their own measurable objectives to plan strategically and implement change (2021, p. 7). DAPs are designed to support the inclusion of what is currently almost one in five Australians with disability (ABS, 2019) and promote accessibility more broadly. Concurrently, the AHRC encourages organisations to develop greater diversity through increased services, more accessible services, building a reputation as inclusive and

promoting success by demonstrating the benefits of supporting people with disability (AHRC, 2017, p.15 of DAP, 2021).

The increased focus on inclusive communication processes in policy development suggests the government wants to improve engagement between itself and some Australian publics, including service organisations. This is demonstrated by establishing the *Disability Inclusion Act of 2014* to address inequities and focus on the roll-out of the National Disability Insurance Scheme (NDIS) and specialist supports. The Act has established a process for the Federal Government to review current procedures to create inclusion. However, the systems can only be as good as the processes established. According to Thill (2015), more work is required to ensure inclusion. Despite open listening in policy development, there is limited opportunity for disabled people to engage in 'shared dialogue' (Thill, 2015, p. 3). Concurrently, no Act exists for ethnic communities to mark successes and challenges against, and this represents a gap. For the government to improve inclusion for all publics, organisations need to establish processes that go beyond their usual practices and recognise the diversity and capacity of all their minority publics in organisational communication (Vardeman-Winter, 2014, Macnamara, 2016, Thill, 2015).

Review of communication theories

This section reviews communication theories that contribute to the strategic communication processes of engagement between service provider organisations and their publics. It also reviews the literature on communication flows between organisations and their diverse publics in order to explore challenges faced when norms of practice are not shared. I explore the impact arising from unequal power relations as demonstrated by naming and framing, and through implicit and explicit communication practices found in norms of practice and norms of culture, to assess whether inclusion is possible for these publics.

Background to communication theories

Understanding communication theories is essential because it is these that enable public communicators to enhance their ability to manage the relationship between organisations and their publics. This relationship is influenced by the communicator's role as an advocate for one party with a simultaneous obligation to meet societal expectations as an ethical professional (McElreath, 1996, the Melbourne Mandate 2012). The role uniquely exposes public communicators to multiple perspectives. When managed well, this offers a fertile space for idea generation and for trouble-shooting strategies to emerge. The power held by public communicators to intervene in competing discourses challenges the democratic process because they can be political and sway the outcome, culminating in an uneasy relationship where some but not all needs are addressed (Daymon and Demetrious, 2014, p. 3). The struggle to achieve a beneficial outcome (given the role is one of advocate) remains, while imbalance arising when a party's needs are not included can affect the relationship.

The role of public communicator is to make meaning of the exchange between organisations and their publics, and their interpretation influences the process to benefit their client regardless of whether the client is a multinational or a community service organisation (Demetrious, 2008, Weaver, Motion and Roper, 2006, in Daymon and Demetrious, 2014, p. 3). This role also influences decision making that can impact the democratic process and create a space for debate to extend engagement to a multiplicity of publics across multiple touch points. This becomes an open space with potential for inclusion when norms of practice found in organisational communication processes and the skills of public communicators challenge the status quo for their organisation's publics. For instance, power invariably resides with the organisation, but the explicit impact of activist publics to overtly change outcomes in a dispute should not be underestimated (Demetrious, 2014). Similarly, the impact of implicit practices found in cultural norms not shared can cause misunderstanding and misinterpretations in organisational communication (Vardeman-Winter, Jiang and Tindall, 2014). For example, Vardeman-Winter et al. found misunderstandings of new breast cancer screening guidelines according to the culture of respondents (2014, pp.

225-226). The authors used an intersectionality framework to unpack multiple identities across culture, language, gender and socio-economic status, which were either cohesive or dissonant with other respondents and the organisation (2014, p. 227). Implicit differences were found in the norms of practice of African American women who did not share cultural norms with the organisation (2014, p.223).

Explicit and implicit processes can mask cultural norms, leading to an assumption that connections have been made. Similarly, an active mediated public sphere dictates the 'societal norms' of acceptable practice. Broom and Sha (2013) argue that this process is most prominently demonstrated through persuasive messaging and advertising to privilege particular perspectives, which has a significant impact. Others agree that the unique positioning of public communicators between the macro of the public sphere and the micro of the organisation holds potential for inclusive practices; nevertheless, the power found in explicit, implicit and media-generated relationships needs to be scrutinised (Gregory, 2012, Broom, 2013, Smith, 2013 and Stacks 2011, Habermas, 1962, 1989, 2006, Macnamara, 2016, p. 8, Daymon & Demetrious, 2014, p. 5).

An analysis of the flow of communication and its influence on the conditions necessary for inclusion provides insight into the power held by parties. Grunig and Hunt (1984) pioneered the one and two-way communication models to theorise the flow of communication and describe the relationship between publics and organisations. The basic tenets of these models describe the flow of information either as a one-way to inform, or two-way to collaborate, albeit opportunities to collaborate vary (Dozier, Grunig and Grunig, 2001, p. 12). Grunig and Hunt (1984) argue the two-way exchange exemplifies excellence when genuinely symmetrical, (see also Kent and Taylor, 2002, Broom and Sha, 2013, and Buber, 1958, Bakhtin, 1981). Nonetheless a deficit arises when an equal exchange is not established by the organisation or public (Sommerfeldt, Kent and Taylor, 2012) and the simplicity of this approach has been rejected by many who argue equal engagement is ideal, given power differences may not be acknowledged and the likelihood of all publics being included is remote (Murphy, 1991, Kent and Taylor, 2002, Broom and Sha, 2013). If inclusion is the aim, then a two-way flow of communication is essential; however, the process requires attention to

potential inhibitors. For example, traditionally, 'public relations has been positioned as a management function of capitalist organisations' within a business paradigm (Holtzhausen, 2010, p. 100). While this relationship may value a two-way flow of communication to maximise engagement between organisation and public, the organisation dominates.

Underpinning the two-way flow of communication are principles of dialogue argued to offer greater capacity for inclusion through an improved focus on the exchange. Taylor and Kent (2014) claim a dialogic process connects and creates sustainable relationships because the speaker and listener have a chance to be acknowledged (Smith, 2013, p. 3). However, the offer of inclusion is not always available. A community consultation between organisation and public provides an example of the limitations faced: people are encouraged to voice their views, but they can then find out they may not be heard. In fact, they may not even be acknowledged or only acknowledged when the organisation decides the point is worth responding to (Macnamara, 2016, p. 97). The process may be dialogic but the power to act rests with the more powerful organisation.

It is useful in the context of this study to elaborate on Buber's (1958) influential theorisation of dialogic communication through relationships with self to show values imbedded through experience and embodiment of the exchange to affect inclusion. He named the relationships, 'I-it' and 'I-thou': 'I-it' is characterised by self-centeredness and monologue, whereas 'I-thou' opens up an exchange to value reciprocity, mutuality, involvement and openness (Buber, 1958, Kent & Taylor, 2002). Buber argues the 'I-thou' attributes have the capacity to rebalance the exchange, offering a space to expose covert advocacies so that minorities have a greater chance for inclusion. Dialogue may make the process inclusive, but it is hard to establish because it requires public communicators to relinquish control (Theunissen and Rahman, 2011, p. 2). To pinpoint pathways to connect to publics, it is important to unpack covert elements in organisational culture through systemic institutional factors that describe the way they do business (Halualani, Mendoza and Drzewiecka, 2009, p. 26). A dialogic communication process holds immense potential to expand an exchange when a

communication process is established to recognise and acknowledge the impact of covert power relations.

These theories of communication have centred on the interaction with or between individuals and the ways in which shared meaning might be developed. Habermas (1987), taking a broader, societal position, described an exchange as holding relational and persuasive principles, and theorised that interactions had either a communicative or purposive action. 'Communicative action' vies for a negotiated exchange with multiple publics to freely exchange ideas and expect to be heard. While 'purposive action' strategically seeks out engagement with identified publics to persuade them to engage in favour of the instigator of communication. Habermas' theorisation of engagement brings depth to understand the practical application of Grunig and Hunt's two-way symmetrical model and Buber's dialogic theories in their principles of self-serving or inclusive practice. However, Habermas' points to the effect of social norms to connect. Chriss (1998), in a review of Habermas' 1992 text 'Between Facts and Norms', describes the tension as a way to balance the community's ability to have a say with laws that establish processes to do so (p. 3). Theunissen and Rahman (2011) agree that if diverse views are to be heard, there must be a process to encourage them (p. 18). While Chriss (1998) calls for greater focus on the exchange between explicit rules of law and implicit rules of norms, he notes that managing the process between these positions is complex (p. 3).

Communicative action creates the potential to hear new views and expand inclusion if it is established as part of a communication system that supports multiple connection (Habermas, 1996). Krompridis (2006) agrees that multiple opportunities for engagement and power sharing are established when norms expand the expectations of publics. According to Theunissen and Rahman (2011), by extending Habermas' communicative action approach to increase engagement with a purposive approach to seek out and create awareness, there is an opportunity to listen to multiple publics and this process can lead to change (p. 18). The challenge for communicators is establishing the process to extend connections beyond the usual publics. For example, an organisation offering housing will consult with their clients and provide information

to them according to their communicators' ability to know the clients' needs. When their ability does not extend to clients such as NESB or people with disability, the materials and methods used may not meet the language or access need in terms of translation of materials or variation of materials to suit a sight-impaired person, for example. The organisation has communicated according to their understanding of what the public needs but has not recognised that more specific approaches are required. The communicator's abilities are a reflection of priorities arising from the organisation and their ethnocentric perspective embedded through historical, political, social and cultural experiences to affect their ability to include (Woodhams and Corby, 2007). Exploring limitations in practice and process is key to isolating and then addressing ineffective communication processes (Harrison, Walton, Chauhan, Manias, Chitkara, Latanik and Leone, 2019, p1).

To achieve access for 'all actors of civil society', (Habermas, 2006, pp.417) a combination of Habermas' approaches to communication may be useful, using purposive action to seek meaningful engagement with diverse publics, and communicative action to facilitate new connections (Habermas, 2006, p. 16; Hallahan, 2007, p. 14; Castells, 2009, p. 301). However, these approaches rely on the organisation to move outside their usual processes and establish new ways of including that go beyond making a connection. Therefore, there needs to be a greater focus on feedback through voice and listening opportunities, as a prerequisite for openness to allow for an exchange that can be listened to (Gadamer, 1989 in Macnamara, 2016, p. 36). The change in focus requires organisations to *want* to know about their publics; exposing both the organisations' norms of practice and their diverse publics' needs is key to understanding requirements and to investigating the powers held to affect communication.

This part of the literature review has analysed communication theories to isolate elements that facilitate engagement with diverse publics and increase their potential for inclusion. While a dialogic process underpins the exchange, there remains both a gap and an opportunity to extend communication to better include diverse publics by focusing on their feedback through the voice and listening capacities of all publics.

There is also an opportunity to analyse the capacities of public communicators to identify norms of practice and norms of culture to understand power relations and their impact on inclusion for diverse publics of organisations.

Structures underpinning a culture of inclusion

A culture of inclusion becomes possible when organisations and their publics are open to a diversity of norms and establish effective communication processes. However, many organisations are not open, which begs the question: why? Ahmed (2012) argues that inclusion is a consequence of organisations having 'an attitude based on an habitually fixed style that values certain aspects of cultural accomplishments' that 'shape what is taken for granted' (pp. 60-61). Vardeman-Winter (2011) agrees that norms of practice facilitate relationships and reinforce habitus through communication structures inherent in the process (p. 417). To share a culture is to share norms that enable understanding (Kim, 2001, p. 143).

A successful communication exchange occurs when implicit cultural norms of participants align, whereas norms not shared result in misunderstanding (Roper, 2005, Hall, 1992, Atkin and Rice, 2013, Vardeman-Winter, 2011). The less powerful minority publics who may not share norms with the majority lack the power and a process to speak back and correct misunderstandings, and their ability to be included is reduced (Roper, 2005, Hall, 1992, Atkin and Rice, 2013, Vardeman-Winter, 2011, 2014). In line with this, cultural exchanges are complex because publics not familiar with each other essentialise the process by drawing on their previous experience and stereotypes to determine what is going on (Holliday, 2010, p. 258). In addition, the communicator's ethnocentric position is rarely acknowledged as affecting the exchange, and their positioning can mean they misunderstand and consequently miss opportunities (Shah, 2004, p. 559). For example, Marianne Sison (2016), an academic of Filipino heritage, recounted her experience of submitting a paper to an international conference of an organisation she belonged to. Rejecting her paper, conference organisers told her that, 'you are too polite, unlike us Americans, we are direct and very critical so you need to be more pointed in your writing so your papers will be accepted' (Sison, 2016, p. 39).

The implication was that she needed to conform to American academic norms of communication. Sison stated, 'that's not me, that is not how I was brought up. Why do I have to change my way?' (p. 39). As her experience demonstrates, there are consequences for those who do not fit the prevailing norm (Ahmed, 2012, Davis, 2013). Ahmed (2012) called these 'givens' and argues that norms prevent other ways of 'becoming' (p. 73). The culture of the organisation determines a 'given' and positions people accordingly.

Honneth (1995) argues that norms are formed as a consequence of society's reinforcing of networks to define social agendas and cultural directions (Jakubowicz and Meekosha, 2002). Nevertheless, Stephens (2015) argues that the concept of a norm is flawed because 'normal' does not exist as a standard measure (Stephens and Townsend, 2015). Shildrik (2012), a prominent disability scholar, concurs that, unfortunately, 'to be perceived as differently embodied is still to occupy a place defined as exceptional, rather than simply be part of a multiplicity of possibilities' (p. 31). According to disability and feminist scholar Be (2012), 'society privileges normalcy and aligns thinking of culture, ableism and gender with othering so people are positioned for reductive treatment'. In this way, unconventional forms of engagement are silenced and require a more complex view of corporeality if they are to challenge universally held norms that block other ways of being (Shildrik, 2012). Similarly, Vardeman-Winter (2011, 2014) found that exclusion results from the favouring of certain communication styles in organisational policy and practice that are underpinned by white privilege (2011, 2014). An absence of synergy between people of differing cultures leads to exclusion of diverse publics in communication campaigns. Decision making is in the hands of the privileged, and intrinsic to inclusive practice (Vardeman-Winter, 2014).

Therefore, creating a culture of inclusion requires an open communication process that seeks out overt and covert ways of being so that norms of practice are expanded to facilitate multiple ways to achieve effective communication between publics (Johnstone and Kanitsaki, 2006, p. 385).

Norms of Culture and Norms of Practice

This section explores the importance of norms of culture and norms of practice in processes of inclusion and exclusion. Here, they are taken to be mechanisms through which framing for communication attention occurs. The emphasis in this study is on these conceptual tools, norms of culture and norms of practice. Norms are the rules, tacit and explicit, that govern behaviours in a given context. The phrase, 'norms of culture' is used to construct the rules of the social context and 'norms of practice' is used to construct the rules of the organisational context.

Norms of culture develop when people who are linked by social characteristics or by experience come together. Culture is a term which can carry several meanings (Williams, 1983, p.87). Holliday (1999) uses the phrase "small cultures" for groupings of people where there are "cohesive behaviours", that is, rules of interactions that link members of the groups together. His focus on intercultural communication means that he aligns 'large culture' with regional, national or transnational groupings. He argues that the concept of "small culture" differs from large culture on three grounds: it derives from the behaviours and interactions of a social group, rather than being portrayed as essentialist or stereotypical; it is not subordinated to any other culture but exists independently of other cultures; from a research perspective, a consideration of small cultures is neither prescriptive nor normative, but is emergent and necessarily interpretive (1999, pp. 240-241). These shared understandings of behaviours allow members of the group to "make sense of and operate meaningfully" in that shared context (1999, p. 248). Although Holliday's concept of small cultures has been developed in a different context, it is relevant to this study.

Norms of culture, then, are shared understandings of how to behave and communicate in a given situation. Schein (1985), writing in the context of an organisation, identified that norms of culture exist at three levels, that he called artifacts, values and assumptions. Artifacts can include communication style; values include knowledge and skills, beliefs and attitudes; and assumptions, which are mostly

implicit, are taken for granted behaviours and perceptions. This categorisation is also relevant for understanding norms of culture in this study.

Norms connect when people share meaning and the experience creates understanding that facilitates communication (Davis, 2013). Thus, it is unsurprising that people from different cultural backgrounds can struggle to engage, and meaning may not be shared (Kalowski, 1996), as they belong to different small cultures, although connections may be assumed by those outside of the group. The misunderstanding that occurs can perpetuate further uncertainty about the exchange that is felt but not confirmed unless feedback is gathered. Moon argues people avoid clarifying meaning to avoid drawing attention to what might be seen as racist, classist or gendered misunderstandings that occur when aware of their outsider status (Moon, 1996, p.201).

Publics can be seen as small cultures, especially minority publics. They interact with organisations, but rather than communicating using the norms of culture of the group, their interactions are directed by the norms of practice of the organisation. This leads to a situation where two sets of norms overlap, impacting successful communication and leading to the need for different approaches to engagement (Moon, 1996).

The phrase norms of practice is used in this study to refer to the norms of an organisation, although much of the literature uses "norms of culture" to refer to the behaviours of staff in organisations. The position taken in this study is that organisational norms are prescriptive, set out through policies and procedures and reinforced by training and development. They are normative, in the assumptions that staff and customers or clients will conform to. Thus, the phrase norms of practice is used for the organisational context. Organisations' norms of practice reflect societal norms and understandings of diverse publics, but these norms are not the norms of culture shared by the diverse public. As noted above, norms allow people who share them to share understanding (Kim, 2001, p.143). A focus on the way norms operate in society draws attention to the way inclusion and exclusion occur because of the privileging of publics who share norms (Habermas, 1998; Davis, 2006, 2013). Structural

inequalities impact publics when norms are not shared and these impacted people become minoritized because their access to products and services and often to participation in the wider society is blocked (Dawson, 2018, p.772). Publics who share norms become the majority because communication is narrowly constructed to privilege dominant publics and minorities are rendered powerless because they are unable to participate or change the terms of participation (Dawson, 2018, p.772). People from non-English speaking backgrounds and people with disability are often marginalised by the norms of practice adopted by organisations because these are at odds with the norms of culture used by these groups. As a consequence, what they need to participate equitably remains unknown or misunderstood and the narrow focus an organisation takes in communicating with them does not take account of their needs for access to a shared communication and understanding (Dawson, 2018, p.783).

Mitchell and Synder argue that publics with "disabilities are treated as exceptions and this valorises able-bodied norms of inclusion as naturalised and qualified citizenship" (2013, p. 47). Further norms are used as a short cut to convey information and popular culture in ways that become part of the lexicon and can inadvertently exclude (Davis, 2013). The application of a norm could be inadequate or inadequately applied because of stereotyping that can contribute to limited understanding of the publics of focus and affect communication (Goggin and Newell, 2005, p.72, Hall, 1997). Norms are deeply embedded values that are implicit and when not shared they will exclude and participants can be unaware misunderstanding has occurred.

Exclusion was identified in Hage's analysis of migrants sharing food to feel at home in a new country, reflective of a cultural norm that is valued within that community. This norm was subsequently interpreted as 'yearning for home' by outsiders unfamiliar with the implicit norms shared within the community (Hage, 1997, p.99). The mismatch was not obvious to either party although they both sensed misunderstanding, without being able to identify the reason (1997). Norms of culture affect communication in ways that are implicit and either not recognised or not fully understood (cf Schein 1985). Likewise, Tan found norms affect engagement for

Chinese Australians, arguing 'embodiment of Chineseness' marked race as a point of difference that had a longer impact on norms of inclusion over time (2003, p.108). She found "the inscription of difference" remains prominent for Chinese Australians and affected their ability to engage (2003, p.108). Norms shared or partially shared can improve inclusion when engagement is reimagined as an asset to the organisation, not a deficit needing to be managed (Dawson, 2018, p.784).

However, taking steps towards inclusion is not simple. Getting more people through the door of a community setting or organisation is not by itself evidence of inclusion. Inviting people from minority ethnic or socio/economically disadvantaged backgrounds into spaces or practices that reflect dominant values of whiteness and class privilege, without fundamentally reimagining the practices involved to engage them, is insufficient (Dawson, 2018, p.784). Messages of resilience to the community – not individuals – was identified as critical to engage with vulnerable communities during the Covid pandemic because of shared culture (Airhihenbuwa et al, 2020, p.1). Their study found incorporating messages from members of the community was essential to engage with communities who bore the heaviest burden of the pandemic (Airhihenbuwa et., al, 2020, p.1).

A culture of inclusion is recognised in official definitions and policy by naming minority publics for attention. For example, an understanding of ethnic minorities based on an indicator such as country of birth may not capture the needs of groups whose birthplace does not align with their native language, as Wadiwel and Cooper (2013, p. 99) found with Russian speakers born in China. People with disability are argued to be the largest minority group in the world, yet identification by ability is highly contested and people are not easily identified, nor do all people identify themselves this way. Historically, people with disability were defined according to a medical definition that privileged the voice of the medical professional as expert, silencing the person with disability (Oliver, 1983, p. 6). A shift to define disability based on societal barriers that people face also redirected focus away from the person (Oliver, 1990). Attention was directed to people's access to everyday processes such as housing and employment to privilege the voice of disabled people, a voice that had been taken away by the

medical definition (Goggin, 2009, Barnes and Mercer, 2003, Swain and Cameron, 1999). Currently, the World Health Organisation (WHO, 2015) defines disabled people based on 'the interaction between individuals with a health condition and personal and environmental factors'. This puts the communication focus on the person and their access to organisations and society, with a clear aim to include. However, the WHO struggled to find an agreed definition of disability for more than thirty years (Jakubowicz and Meekosha, 2002, p. 248), making it impossible to usefully compare cohorts and build up data. Similarly, in Australia, people with disability are named differently from census to census (Wadiwel and Cooper, 2013).

When organisations' norms of practice are founded on simplistic understandings of minority publics, communication may fail (Holliday, 2010, Grunig and Hunt, 1984, Davis, 2006, 2013). Grunig gave the label of publics to individuals who come together to respond to an issue but also acknowledged that identifying their characteristics for targeted messaging was challenging because of the assumptions implicit in interactions (Heath, 2001, p.141). That is, norms of culture and norms of practice may not be shared and publics can misunderstand staff in an organisation and be unaware they misunderstood. While Grunig's way of identifying publics has been superseded, its core is still valid, having similarities with Holliday's notion of small cultures (1999). Ahmed (2012) argues that identifying publics by a name uses a set of 'norms, values and priorities that determine what is granted and privileged and how' (p. 60). Naming becomes part of an organisational 'norm of practice' that facilitates common processes to engage. Further, the media's role in naming also reinforces norms of practice as acceptable (Stansberry, 2011).

Publics can be named according to the ways they interact with an organisation. Here, the focus is on the levels of communicative behaviour between themselves and organisations, as this affects the exchange (Hallahan, 2001). A common categorisation of communicative behaviours labels publics as active, aware or latent (Grunig, 1978, Kim and Grunig, 2011). This categorisation has been extended to include a larger range of contemporary publics that are reflective of society (Aldoory and Sha, 2007). This

study's focus on minority publics makes it a useful categorisation, allowing a focus on publics with differing levels of interactions with the organisation.

Organisations' norms of practice often draw on essentialised understandings of minority publics based on stereotypes. Stereotypes reduce a complex person to a set of characteristics and assumed behaviours that may not fully represent the person. Using their incomplete understandings of minorities, organisations may assume that understanding has been achieved, but this assumption can be wrong (Davis, 2006, 2012, Mitchell, 2013, Dossa, 2004, and Lee & Lutz, 2005, Holliday, 2010). For example, as mentioned above, Vardeman-Winter, Jiang and Tindall (2014) found that when women from different language and cultural groups were the focus of the same communication campaign about changes to a breast-screening process, not all groups received the message adequately. This may have contributed to long-term health disparities for those who missed the message (p. 238).

Organisations cannot assume that everyone within any particular label necessarily shares a common experience. People may identify as NESB when they have a particular need for an organisation to translate materials or to bridge cultural differences; however, identifying NESB persons may not be relevant in every situation. Similarly, Reeve (2012) found there is a false assumption that 'disabled people, share a common experience of disablism', neglecting differences that may arise due to gender, class, sexuality, ethnicity (p. 89).

Davis (2013) argues that the naming process sets up a 'hegemony of normalcy' that powerfully supports certain narratives, making it hard to conceive different perspectives (Barnes, Mercer and Shakespeare, 1999). Davis (2013) states that 'the implications of hegemony are profound and extend into the very heart of cultural production' (p. 12). He challenged the basis of attributing norms, arguing that norms create a place where people with disabilities are reductively positioned for 'specialist' treatment that requires 'fixing' (p. 6). Newell (1996) agrees that the way standards or norms are set and named can act in ways that are contrary to the interests of people with disability (p. 431).

When organisations name publics this affects their ability to engage, and the process is particularly problematic for those who struggle to be recognised (Vardeman-Winter, 2011, Davis, 2013, Wadiwel and Cooper, 2013). There are other factors at play that influence the creation of norms of practice and its interplay with norms of culture. One of those is the power dynamic in a society. Demetrious (2013) argues that the re-positioning of publics from citizen public to consumer has come as a consequence of increasing neoliberalisation. The process 'transmogrifies the citizen' by changing the structures for participation within civil society. Citizens are positioned in ways that change norms of practice, limiting their ability to speak back to organisations on points of concern beyond an economic perspective (Couldry, 2010). This reframing of a public reduces engagement potential for those whose concerns sit outside of an economic relationship. For example, a customer can refer back to the organisation when a good (product or service) does not meet the expected need, but a question about access may not be one staff in an organisation can respond to as it is outside their remit. Following this argument, NESB people and people with disability could gain new recognition as consumers if their needs are taken into consideration. A neoliberal model that recognises the needs of minority publics could offer some potential for inclusion.

Publics are framed in communication to reflect societal norms of practice (Entman, 1993). Framing is an important process in strategic communication, as it is the process through which successful targeted communication is developed. Entman's focus is the media and he argues that framing occurs when the 'selection and salience' of information aligns with personal values (p. 51). This way of framing, which is based on the sharing of certain types of information, positions publics for attention in a different way, potentially making them powerful and freer to speak up (Entman, 2007 p.170). However, when information is limited by certain norms, other ways for publics to present themselves and their lives are not considered (Campbell, 2009, Garland-Thompson, 2010). This framing process impacts decision making through what Hallahan (1999) calls a 'schemata of interpretation' to provide context for how

communication enables individuals to 'locate, perceive, identify and label' information (p. 208). People in a minority can be limited by others' ability to know them and their access needs. This problem is compounded when people in a minority do not find themselves represented or the organisation has not included them as a public to adapt information for as part of their norms of practice. This can result in reduced options to interact (Vardeman-Winter, 2011). Thus, a lack of diversity in the representation of people affects their ability to imagine themselves in roles beyond the stereotypical (Garland-Thompson, 2016, Haller, 2016, Paramanathan, 2017, Amnesty, 2017). This is particularly problematic when this happens in an organisational context and these limitations are formalised in norms of practice.

Framing is grounded in shared cultural values that may not be common to publics outside of a particular community (Airhinhenbuwa et al., 2020, p.2). Airhinhenbuwa et al.,'s study of communicating health messaging across culture during the Covid pandemic found working in partnership with the community intrinsic to identify culturally appropriate health messaging and effectively promoting it (2020, p2). Accepted beliefs about people influence norms of culture and norms of practice and create bias that impacts engagement (Entman, 2007, p.170) between organisations and diverse publics. This process where beliefs become accepted can lead to unsatisfactory outcomes because they are not real. In their relationships with an organisation, publics can convince themselves of a need for something; they elaborate on it to personalise it and the idea of having this 'something' becomes a reality (Petty and Cacioppo, 1986). For example, when publics are asked to give feedback on problems they experience or ideas for improvements, they may make the assumption that the changes they would like to see in an organisation's products or services will be made. Thus, it is unsurprising, that, having set out the changes they would like to see, they feel let down when not only is there no change, but they receive no response. The organisation's norms of practice set up the environment to conform to particular conditions and publics become confused when they think they have acted according to the organisation's norms, but their expectations are not fulfilled.

Campbell argues that foregrounding a person's disability constitutes 'ableism', a set of beliefs and practices shared to produce a norm, and when it is not achieved, equates to abnormal or 'ableist normativity' (Campbell, 2008, p.153). Campbell (2009) defines ableism as a norm that is white, male and privileging of one view of a public while masking others. Many organisations operate within an 'ableist' framework because they lack the ability to scrutinise their own worldview and an ability to question principles behind communication decisions as norms of practice are not shared. People can be simplified into a binary, able or not able, and the opinion of the more privileged or powerful prevails (Thomas, 1999, p. 24, Campbell, 2008). Some examples of scholars in the field of communication seeking to avoid this binary divide include Garland-Thomson (2010) and Haller (2016) who aim to position disabled people prominently in everyday situations via media to challenge norms of practice. Thill takes a similar activist perspective and names people with disability as 'disabled' to call attention to the disabling structures, the norms of practice and the norms of culture, that impact their inclusion (2015). By challenging dominant norms of practice and reviewing the way diverse publics are framed, possibilities for inclusion can emerge.

Exercises of Power

Underpinning the communication process is the need to understand publics, the way they share information and the power relations that exist. Norms of practice and culture connect those who share similar norms through frames that lead to inclusion; however, when norms are not shared, the exchange can lead to exclusion (Habermas, 1998, Davis, 2006, 2013). Norms can manifest explicitly through communication policy and processes, and implicitly through cultural values. By analysing the impact of implicit and explicit norms on inclusive processes, power sharing and decision making can be assessed to explore whether inclusion is possible.

People who share cultural values share protocols of engagement that may not be seen by those outside the culture. This can also be seen in organisational communication processes that misconnect. Habermas (1979) states that when implicit norms of practice are shared, 'mutually recognised validity claims' increase the possibility of

inclusion in decision making (1984, p. 209). Nevertheless, while feminist scholar Susan Bickford (1996) agrees that Habermas' communicative action process can be inclusive, she argues that the process is limited because participants are pushed 'to reach consensus' (p. 17). A collaborative process risks not allowing for all opinions to be heard because the ability to engage varies (p. 18). A communication exchange is complex because the capacity to share norms of practice varies and should never be assumed. While explicit processes dominate, the implicit power in an exchange plays a key role that can enable shared voice and listening. Lukes (1978) states that attention shifts when unconscious actions are given undue prominence in an exchange. In his seminal work on power, Lukes describes three dimensions of power, and the way an agenda is controlled to manage political issues (p. 21). He argues that power is ever present, always playing a role in communication and, through covert processes, it can support assumptions that parties are in agreement. For example, cultural norms may be shared through non-verbal communication in organisations: a smile may indicate agreement, but a smile (by a person not wanting to offend) may also indicate disagreement. The overt action may not align with the intent, which is covert. In line with Bickford, Lukes (2005) states that individual positions are rarely articulated in communication feedback because the process summarises outcomes and there is an assumption that the majority view is shared, as in the example of the smile (pp. 64-65). Embedded power relations and social norms that occur in the exchange are complex and need unpacking, given 'consensus arises from the suppression' of those who lack prominence in the exchange (Lukes, 1978, p. 19). The question then becomes: can people become empowered and contribute to the exchange to reveal suppressed opinions?

Lukes (1978) also found that alliances that occur through overt decision making and covert non-decision making send a message of resistance and affect a successful exchange (p. 19). Lukes argues that the decision-making process in organisations is narrowly conceived, given that conflict can be suppressed, or its presence not considered, and consensus only arises when the more powerful dominate (Beland, 2006). Thus, power can drive decision-making processes to create an assumption of consensus. The process positions the less powerful members of society so that access

is only offered when their presence is overtly acknowledged. Those in power need to acknowledge the impact of covert processes if they are genuinely seeking access and inclusion in society. To counter covert influences in the decision-making process, Lukes' (1978) study found that posing a question in a face-to-face meeting encouraged participants to contribute, consequently achieving inclusion. This process was especially useful for minorities whose voices may be harder to hear (Lukes, 1978). Further work by Lukes (2005) claimed a deeper analysis of power is possible, but warned that power is polysemic, that there is no common essence, that it varies by language and is 'inescapably political given power is "essentially contested"' (pp. 59, 61, 63). This final argument draws on Gallie's (1955) claim that there is a single concept of power but there are endless disputes about its proper use (Lukes, 2005, p. 62).

Thus, the challenge for professional communicators is to find a process that enables a multitude of voices to be exchanged. Gathering views is complex because participants are not value-free, and their comments can be decontextualised through the process of creating summaries (Dahlgren, 2009, p. 13, Dahlberg, 2014, Macnamara, 2016, p. 10). Therefore, an assessment of the framing of diverse publics who may not hold the same power or ability to speak up could isolate points to address in future communication processes. Thus, understanding norms of practice and norms of culture is fundamental.

Implementing Strategic Communication in Organisations

This final section of the literature review sets out the three levels at which organisations, through a strategic communication lens, can demonstrate their practices of social inclusion. The move from a public communication focus as encompassing all communication within an active mediated public sphere to strategic communication as purposive action aimed to proactively engage specific publics is deliberate (Demetrious, 2014, Habermas, 1984, Hallahan et.al, 2007). If the strategic communication link is broken, the consequence is likely to be a disconnect between policy and inclusion (Triggs, 2013).

Vision statements and their link to organisational practices

This subsection describes the importance of a strong relationship between the organisation's vision statement and their policies and practices, as articulated by their goals and objectives, to achieve inclusion as their strategic communication aim. It explores the links between these processes and asks whether they are superficial or intrinsic to genuine inclusion.

The analysis begins from Lencioni's assertion that value statements are "bland, toothless or just plain dishonest and far from being harmless, they can be highly destructive" because they undermine the true values proposed by the organisation (2002, p.113). I explore these assertions to investigate why values are established and what happens when there is a poor connection between values found in vision statements and the practices offered by organisations that claim to value inclusion.

Few studies focus on the strategic link between vision statements and organisational practices as described by goals and objectives to measure success. This is somewhat surprising, given the substantial literature on values within organisations. However, the majority of this literature is concerned with the values held by organisations and stakeholder groups rather than the links between vision statements, which promote the values of an organisation and the objectives and processes for implementing and achieving them in organisations.

Vision statements convey the long-term aims of the organisation and its connection with the changing environment to describe their values according to markets, technologies, and competition (Bowen, 2018). Thus, vision statements are not measurable, nor can they be evaluated against because they provide too little structure (Lencioni 2002). Lencioni identified four basic imperatives to create and implement values but found issues arose when managers confused them. For example, he found organisations describe aspirational values of where they want to be, such as offering inclusive service and confused them with core values of what they represent, as inclusive service (Lencioni, 2002, p.6). The mismatch leaves the organisation with value statements that are empty because they are unable to achieve their aim, thus

creating dispirited employees and alienating customers because these value statements are not genuine (Lencioni, 2002, p.5). Genuine values can set the company apart, so it is a wasted opportunity when they are not strategically aligned to demonstrate the values underpinning the business (2002, p.6). The reason, according to Lencioni, is it is difficult for the organisations to embed that commitment, ensure staff are fully briefed and monitor to adjust processes as required (2002, p.6).

Tension arises when values and formal governance mechanisms are impacted by the economic situation (Thomsen, 2004, p41) and prevent the inclusive processes from being realised as promised. Visionary companies, however, stand out because their focus is achieving core values that extend beyond profit making (Williams 2013). Visions and entrepreneurship disrupt structures and create innovation to inform corporate values and challenge traditional models of capitalist enterprise (Schumpeter, 1950 in Thomsen, 2004, p.41). However, establishing a system to report success against is not easy. It requires a genuine commitment to their vision and how it manifests. An integrated process allows organisations to discuss and define their core values and through the interaction create understanding built through cohesion (Humble, Jackson and Thomson, 1994).

Values articulated by vision statements must align with organisational goals if they are to be embedded across the entire organisation, to be strategically effective, and are informed by the organisation's core culture, not aligned with a HR function to build consensus (Lencioni, 2002, p8). True engagement with values is not easy (Lencioni, 2002), because the organisation must commit to processes that link internal and external goals and adjust communication practices to align with their vision, values and processes (Thomsen, 2004, p.40-41). Inclusion may be a core value but if it is not linked to organisational processes that embed it in every process then it becomes aspirational, not measured and therefore not properly resourced.

Legislation provides one framework for organisations to work towards to achieve their goals of inclusion with success measured by compliance indicators, but it does not evaluate the impact of their strategic communication action (Zerfass, Tench, Verhoeven, Vercic and Moreno, 2018, Zerfass et. al, 2012, p. 36, the Global Communication Report, USC, Annenberg, 2016). Strategic communication goals measure success according to the organisation's articulation of their mission and vision statements through SMART objectives (Smith, 2017, p.107). These objectives are designed based on the organisation's goals and, ideally, research collected from the feedback of current publics to meet their specific needs. However, feedback can be limited to certain publics making the focus on minorities harder to achieve (Daya, 2014, p.301).

For organisations to recognise diverse publics, they need to develop goals, objectives and performance indicators that are relevant to the needs and requirements of these publics. The organisation's goals and objectives operationalise the values found in their mission and vision statements to guide managers' communication with their publics. The literature contains few examples of goal setting that achieves this close linking of values with objectives. Much of the literature is concerned with a normative approach, encouraging strategic communication practitioners to work to establish goals, objectives and plans to facilitate purposeful engagement with diverse publics, as Hallahan, Holtzhausen, van Ruler, Vercic, and Sriramesh (2007) propose.

This is not to say that there is little concern with operationalising values, however, these values and their operationalisation reflect a broad societal agenda, and a tool to measure success may not be embedded in the context of the organisation. As noted above, the transnational rights agenda of the United Nations is extremely influential in questions of social inclusion. Thus, the values are often operationalised through the organisation's alignment with societal expectations to integrate "the economic, social and environmental dimensions of practice" (Montesano, Biermann, Kalfagianni and Vijge 2021, p.1). These goals may be reported separately, against wider directives

related to the United Nations 2015 sustainable development goals (SDG) to demonstrate their progress towards these societal values (Grainger-Brown and Malekpour, 2019, p1). However, these goals are usually aligned with the organisation's sustainability processes for reporting and not linked to the organisation's business focus to remain financially viable. The alignment of reporting processes affects the organisation's capacity to measure their values and financial progress as equal goals.

Montesano et. al questioned whether the focus on transnational goals ensured a commitment to meeting the requirements of minorities (2021, p.2-3). They found that a vision based on SDGs became effective in shaping organisational goals to improve inclusion when awareness was created within the organisation of ways to measure and align success (2021, p.12-13). Likewise, Daya found awareness of an inclusive vision was only possible when minorities were able to relate to the organisation's values of inclusion (2014, p.301). The lesson from these studies for practitioners was that establishing organisation goals based on SDGs is not a linear process where a SDG is simply "applied" to targeted recipients but an opportunity for change to emerge from "the constant cyclical interplay of agents and their context" (Montesano, 2021, p.13).

Setting objectives and establishing key performance indicators are important processes, because "what gets measured is what gets done" (Peters, 1986 in Macnamara 2018, p. 193) and if services and products for minorities are not specifically included, those groups may find their requirements are not taken into account. Organisational processes of evaluation do not measure values, they measure outputs from the organisation. The evaluation process is therefore limited to the organisation's remit and does not include reporting from external publics or society to gauge how an organisation's processes meet external values and expectations (Macnamara, 2018, p.187). The Public Relations Institute of Australia has encouraged practitioners to take a more advanced evaluation process, incorporating both organisational 'outcome' and 'impact' as reported by external publics (PRIA, 2022). Such an approach uses operational practices, building in two-way communication, dialogue, and engagement points to measure between organisations and publics. In this context, organisational communicators could measure contact and impact for the

publics who are engaged with the organisation. However, the process is not able to measure engagement of publics that are not part of the organisation's specific focus and because the feedback system does not collect information, they are largely excluded (Dawson 2018, p.774). Feedback systems are narrowly aligned with the organisation's goals (Macnamara, 2018, p.193) not their broader values. Thus, in an ideal situation, the values of the organisation should be reported against alongside the goals and objectives of the organisation and measured in the same way.

A strategic communication approach can be a way to purposefully engage with minority publics (Hallahan, Holtzhausen, , van Ruler, Vercic, and Sriramesh 2007, p.5) and for that reason it becomes an essential organisational strategy for diverse publics who might otherwise struggle to be connected to an organisation and have their needs met. A strategic communication process uses persuasion to create awareness amongst minorities to encourage engagement. It is often regarded as unethical given its bias is from the organisation to fulfil their agenda (Fawkes, 2007, p.313). Nonetheless it is an important component to equalise engagement with society's marginalised people, thus leading to a more democratic society (Demetrious, 2021, p.3).

Other key aspects affecting an organisation's priorities, and therefore their emphasis on the requirements of diverse publics, are operational structure and market orientation. Taking a normative approach, Thill (2015, p. 40) argues that institutions need to structure the way their minority publics can be heard. Structurally, some organisations measure successful engagement of minorities under their corporate social responsibility goals of sustainability because it is important to demonstrate alignment with values of inclusion. This alignment reflects the worldview of their organisation, and it affects the way they attend to their minority publics in two ways. Their engagement is measured separately from that of other publics so their feedback is also separate and not incorporated to give a comprehensive view of engagement to meet their overarching goals. As a consequence of the separation they become a specialist stream and require specialist staff and specialist attention that needs another level of justifying to resource (Mitchell and Snyder, 2013, Barnes, Mercer and

Shakespeare, 1999). Structural inequalities maintain or exacerbate social inequalities (Fraser, 2003) and the oppression is hard to pinpoint (Dawson, 2018, p.776).

A market orientation to business privileges sustained and continued economic growth by facilitating capital accumulation rather than focusing on accountability to citizens to meet societal objectives (Schrecker, 2009 in Townsend, 2020). The approach uses a neo-liberal ideology that favours a free-market exchange and aims for minimal government intervention and maximum growth. A public interest frame aims to ensure public interests are not dominated by private interests. However, asserting the importance of the collective interests and rights and a state sovereignty frame is where the interests of not-for-profits dominate (Townsend et.al, 2020 p. 118-121).

Organisational goals can conflict when objectives collide and create challenges to reconcile competing pressures to meet external compliance criteria (Townsend, 2020, p.115). For example, diverse minority publics can compete for attention if their success is aligned with profit making goals rather than sustainability goals, given that a neoliberal market framing dominates. The market frame is particularly constraining for arguments to address social determinants of health, as was Townsend's focus (2020, p.119)

Demetrious cautions against organisations taking a market-oriented agenda, suggesting that such an approach can lead to a loss of focus on minorities (2021, p. 4), and the reduced focus is reflected in the organisation's priorities (2021, p.5). A market driven approach may be essential for organisations to remain viable, but options for engaging minorities can be reduced unless authentic dialogue is established that leads to co-designing engagement (Demetrious, 2021, p.8, 12). In part, a market driven approach changes the focus on publics as citizens, part of civil society with rights to engage, and "transmogrifies them" into clients or customers of organisations and the positioning affects their capacity to engage equally (Demetrious, 2013, 2021, p.14). Thus, dialogue is subject to both external and internal processes that shape the environment they operate in (Macpherson, 1977 in Demetrious, 2021, p.14).

Organisations are more than their structure and their goals and objectives. Organisations are, fundamentally, the people whose roles are defined within the structure and whose responsibilities are the implementation of goals and objectives. For staff to provide appropriate levels of service to their diverse publics they need to share the organisation's vision of inclusion. A strategic Internal communication process offers staff a process to create such a climate when it is formally embedded, staff are trained to manage access and the process is resourced according to feedback from minorities on success or failure. A climate that is open, participatory and inclusive of minorities who would otherwise be excluded when information is not shared offers organisations a process to include them (Lee, Li and Tsai, 2021, p.54). Such a process, formally offered and accessible for all staff, might serve as a model process for the organisation to offer their minority publics when an effective listening and feedback collection process is in place (Lee, Li, Tsai, 2021, p. 54). However, a formal process alone is not sufficient as Lee, et. al note. Incorporating informal processes is critical when managing culturally diverse interactions since misunderstanding is likely to occur when norms may not be shared (2021, p.55). Thus, a strategic internal communication process requires a focus on formal and informal communication channels, as norms of practice and norms of culture when engaging with diverse minority publics that may push managers to move outside of their usual remit, supporting Dawson's point that 'what counts' might help to reimagine 'who counts' in more inclusive terms (Dawson, 2018, p.783).

In a field that emphasises models of practice, there is no "one size to fit all" communication strategy, according to Hyland-wood, Gardner, Leask and Ecker, who argue a normative framework must be adjusted to fit alternative normative contexts (2021, p7). This is a significant point, as it highlights the importance of local context. In the list of minorities that Hyland-Wood et al. provide, NESB people are not included and only certain people with disability, highlighting the variation of what constitutes a minority (2021). The variation in understandings of minorities affects the findings of studies because different data is collected and researchers are unable to compare outcomes (Hyland-wood, et.al, 2021, p.8, Wadiwel and Cooper, 2013, p.104).

The process of sharing information among staff to improve engagement with minorities varies according to the value the organisation places on inclusion and can be noted by their opportunities to give feedback (Hyland-wood et.al, 2021, p.7). When publics are not part of "an interest group" it is hard to communicate effectively with them (Thill and Dreher 2017, p.6) and staff are not always skilled to understand why.

Staff need specialist communication skills to engage diverse publics. However, the literature indicates that there is no consensus on what those specialist skills are. Few organisations distinguish between a policy officer, knowledgeable about the minority, and a communicator who knows how to engage (Sison, 2016). These are specialist skills acquired through accredited courses of study, and often the basis for employment. Sison finds teaching is dominated by "white Anglo Saxons" and she calls for privileging broader cultural perspectives to reflect the reality of society (p.39). People with lived experience of being a minority are a valuable resource in organisations (Vardeman-Winter et al, 2014, Davis, 2013, Goggin, 2009, Campbell, 2010). Capable of bringing their lived experience to improving engagement processes, their knowledge is not always formally recognised nor valued as part of their workload. As an example, Virdun, Gray, Sherwood, Power, Phillips, Parker and Jackson in their study of an Indigenous curriculum in health care found there is too much reliance on Indigenous academics to be responsible for sharing cultural knowledge when there are so few to share the load (2013, p.98). The value Indigenous academics brought was acknowledged but not sufficiently supported so they could provide the assistance non-Indigenous academics needed to provide information in culturally appropriate ways (p.98). More extensive resources are required when organisations encourage publics with lived experience of diversity to help them engage their diverse publics to go beyond informal arrangements which are not part of a supported formal process. A similar issue was described in organisations by staff unfamiliar with engaging people with disability: Pereira and De Abreu Figuero argued that accessible relationships and communication practices (2020, p.61) were important and need to be acknowledged. They involve workers identifying their own practices and as these are adapted they become inclusive and communication is improved (p.2020, p.53). Providing (dis)ability awareness training strengthened employees' ability to engage and the workforce

attitude changed (Kazlauskaitė, and Bučiūnienė, 2010). Further, as a consequence of hiring people with disability, the workforce becomes diversified and leads to a more inclusive and positive workplace because people have a chance to understand one another (Lindsay, Cagliostro, Albarico, Mortaji, Karon, 2018, p. 650). The opportunity to openly engage with people with disability reduces barriers and creates confidence among staff, positively influencing the culture of the organisation and they found they also became more productive (Lindsay, et.al. 2018, p.634).

However, it may be inevitable that staff may not have the skills needed to communicate effectively nor may they have the lived experience of diversity or connections to give them confidence in their communication. Training becomes essential. However, it may not be recognised as necessary because gaps in communication are missed by staff unfamiliar with engaging with minorities and the justification needed to establish training is absent without data to support it. This may occur because inclusion is not recognised as a value that contributes to an organisation's economic success, thus it is unlikely to attract the funding needed to achieve the aim (Townsend et.al, 2020, p.123).

There are many approaches to identify gaps to address in training, especially in organisations that cross culture where new values may be identified (Bandara, Adikaram and Dissanayake, 2021). Training has been argued to help managers include their diverse minority publics. However, assumptions can be made about trainees' capacities that Noon found when reviewing 'unconscious bias training' (2018). The approach emerges from the premise that everyone is biased but by recognising that bias, behaviours can be changed. Noon cautions that it works by assuming everyone is racist and unaware of their bias (2018, p.199). This generalisation in approach diminishes the intent as a purposeful way to reduce discrimination because it assumes norms are shared when they may not be (Noon, 2017, p. 199). Diversity training may be helpful to identify interventions that are pedagogically sound (Swan, 2009) but without an effective process that supports their use and applies the values raised, training programs will be ineffective (Noon, 2018, p.206).

In many organisations, specialist information to engage diverse publics is available to a limited number of people when it could be widely shared through a strategic communication process to all employees, not only specialist streams (Ciszek, 2020, p.6). Inclusion is more than getting people through the door, or increasing the client base, according to Dawson, it occurs when an environment is established where multiple views are valued and as a result can be heard and shared (2018, p.784). Successful dispersion of information relies on the organisation having a structure and process to create connections between staff and individual members of minority publics (Virdun et. al, 2013, p.101).

Organisations and their processes

In this section I will describe relationship development that occurs when engagement is created and trust establishes communication between organisations and their diverse publics. Engagement occurs when staff in organisations and minority publics connect in ways that enable each other to put forward their ideas and to make decisions (Johnston and Taylor, 2018, p.1). Through engagement, participants learn about one another and over time establish relationships because they share values (Everett, 2018, p.91). The relationship encourages diverse publics to express their views and the process empowers them because they are familiar with the environment and the norms of practice. The exchange enables relationships to be established and participants expect to be listened to. It is a reciprocal process, built on trust (Kent and Taylor, 2002), and expectations it will be mutually rewarding (Bruning and Ledingham, 2000). Feedback is key to this reciprocal process: It must not only be requested but should be expected as part of the relationship to enable minority publics to improve the services they receive. Successful engagement will mean different things to different people (Everett, 2018, p.93) and within this dynamic, relationships can be swayed to meet agendas that might not be obvious. For example, organisations might consider successful engagement as the purchase of goods whereas minorities may see it as having their access needs attended to so they can engage. The process is not always transparent, and many diverse publics can struggle to participate with a system because their voice differs, and the system may not hear

them (Ashby, 2011, Thill, 2015). Organisations and publics benefit from mutually rewarding relationships when a communication system is established to meet their access needs as well as the organisation's to engage and be inclusive.

Establishing and managing relationships

For organisations to recognise diverse publics, they need to establish relationships with them. Managers experienced with engaging with minorities are likely to hold relationships, but these relationships may not be shared with other managers across the organisation due to limitations of the strategic process (Lee, Li and Tsai 2021, p37). Similarly, norms of engagement may not be shared, leading to missed opportunities to make connections that extend beyond the "in group". The significance of these missed opportunities is that they are covert, as those that do not share norms are completely unaware an opportunity exists to engage (Hyland-Wood et. al. 2020, p.6). Norms that are not shared alienate the "out group" who, as a consequence, become marginalised (Guttman and Salmon, 2004, Lupton, 2015). Hyland-Wood et al. argue the gap can be addressed by appealing to shared norms to improve engagement (2020, p. 6). It is a challenging process. Habersaat et al., 2020 (in Hyland-Wood et al. 2020 p.6), suggest that by focussing on the interactions between staff and minority publics, the importance of identifying shared norms and how these can be extended to include diverse communities becomes apparent and can lead to modifications in that process of interaction.

Working with people with lived experience of diversity is recognised as a resource for organisations wanting to improve engagement but connections can be hard to achieve unless embedded in the current system (Chauhan, Walton, Manias, Walpola, Seale, Latanik, Leone, Mears and Harrison, 2020). Chauhan et al. found a lack of attention to relationship development for ethnic minority consumers resulted in negative outcomes in health care settings because nuances that improved access were not identified and re-embedded in the strategies developed to engage (2020, p.22). They argued relationships that led to co-designing approaches to adapt and develop suitable engagement strategies were needed to address gaps in communication (2020, p.22).

Formal relationships connect people with lived experience to the organisation's strategic communication process, but the connection is only ever available to some people, according to Dawson, who links this process back to organisational goals, suggesting "what counts" may help to reimagine "who counts" (2018, p.783). In other words, the process may suggest inclusion is the aim, but they are 'empty words' (Lencioni, 2002, p.113) because access is only available to some people. Likewise, Cake and Kent found decisions about inclusion when designing urban spaces for people with disability were based on who is considered normal or according to specific principles of participation in society (2014, p.115). The terms used by the organisation influence how inclusion of people with disability occurs and can extend participation when a broader focus is applied (Ellis, Kent, Hollier, Goggin, 2018, p.106).

Given international recognition that diverse minorities should be identified as a priority group, it is surprising there is a limited number of formal relationships established to engage them (Chauchan, 2020, p.22). Perhaps it is because informal communication processes have been used to bridge the gap. While informal engagement processes benefit the organisation, through improved morale (Lindsay et al., 2018, p.651), the informal nature of the relationship means it is not recognised by the organisation and can be inconsistently offered (Daya, 2014, p.304) because of the process and inadequate funding. There is an ongoing history of managing relationships with minorities who find themselves on the periphery, valued but not formally recognised, and Edwards argues these "spaces of appearance" demand attention to showcase the plurality that exists in society that must be heard (2016, p.5).

For example, people with disability may have specific and varied access needs and having a relationship helps organisations to develop information in the way they need it, but if they are not part of a mainstream focus their needs can be missed (Everett, 2018, p.97-98). Similarly, translations of information into other languages for LOTE publics may be required but organisations might use informal translators that Chauhan et al. found contributed to increased risk of misinformation because the translations were not always correct (2020 p. 1). Cultural differences were also largely unrecognised and not addressed, affecting the engagement opportunity for ethnic

minorities (Chauhan, 2020, p.1, Everett, 2018, p.98). Establishing and maintaining relationships with diverse minorities is improved by a communication process that treats participants equally and spends time developing and maintaining trust (Hyland-Wood, 221, p.1).

Developing Trust

From a strategic communication perspective, trust between an organisation and its publics is fundamental for provision of effective services and is a key part of establishing mutually rewarding relationships. Most scholars acknowledge that establishing dialogue is essential to developing trust. This becomes especially important when communicating across culture, since trust may be shared when norms may not be (Hyland-Wood, et.al., 2021, p3). Researchers identified ten indicators to enhance message delivery and actions to improve health outcomes of the community during a pandemic and found they all relied on generating transparency and trust (2021, p.3). Success was achieved when people with lived experience from the same socio-cultural background were consulted directly and their feedback improved strategies because common ground enabled them to build trust (Hyland-Wood, et. al., 2021, p.7).

Transparency and trust were identified as intrinsic to building relationships that improved engagement. However, there is no single approach that can be used in all contexts (Hyland-Wood et.al, 2021, p8). Input from people with lived experience improved communication because they began to trust each other through their shared norms of culture to achieve mutually rewarding goals (Bruning and Ledingham, 2000).

Ciszek, on the other hand, argues trust must be established as an antecedent to dialogue (2020, p.1). Her work focussed on LGBTQ people as a significant public in the American population who are under engaged with (2020). Ciszek's approach runs counter to earlier arguments about establishing dialogue to create trust. She argues that since trust comes before dialogue, historical issues and barriers to trust and communication must be dealt with first to foster commitment, creativity and innovation through cultural competencies (2020, 4). Ciszek finds trust occurs when

people situate themselves in the worldview of others by understanding the attitudes, beliefs, and values held (p.6). The action manifests in internal policies and procedures to mirror shared values for inclusion, and trust is demonstrated through cultural competency (2020, p.5). However, cultural competency does not offer an easy solution to establishing relationships. Noon, for example, found cultural competency was applied as a quick fix or tick the box to address exclusion rather than a well-considered and embedded long term process to address the specific issue (2018, p.2016).

This section argued relationships are improved when worldviews are shared or informed by people with lived experience (Kent and Theunissen, 2016, p. 4043) to create openness and a respect for diverse opinions so minorities can be empowered to speak up and be heard (Ciszek, 2020, p.6).

Agency

A strategic communication model of engagement acknowledges that in strong relationships between organisations and their publics, the experiences and opinions of publics, transmitted through feedback, demonstrate that publics can have agency in the relationship (Hallahan, 2007, Zerfass, Vercic, Nothhaft and Werder, 2018, p488). Likewise, public communication is shaped by cultures and society outside of the organisation and the communication itself provides agency to intervene in society to generate change (Edwards, 2018, p.5). Edwards argues that agency alone is not enough. Publics always exist in some societal or institutional structure that shapes communication to make engagement possible and they can be empowered when organisations or other structures of which they are a part take steps to change the relationships between themselves and their publics, for example by bringing in new information or creating new possibilities for action (2016, p. 9). By having agency, publics are recognised and have the capacity to seek changes and have those requests taken seriously.

However, diverse publics can fail to have the agency they need to be included. There are several reasons for this. There is an assumption that minority publics "reflect the shape, values and practices of dominant groups" (Dawson, 2018, p.772) and when it is

found they do not, the organisation has no way to take account of the feedback. Even though the organisational structure might prioritise them for attention and special access, this does not mean all publics hold agency to speak up or speak back. Since the organisation then has no mechanism for response, minority publics lose agency, the organisation remains unaware of the issue and the minority public can be excluded (Levitas, 2004 in Dawson, 2018, p.775).

Positioning can also reduce diverse publics' capacity to engage and their agency to make a change. Dawson argues marginalisation and oppression occur when people are unable to participate, benefit or shape public practices (Fraser, 2003, Young, 2000) as a result they lose agency (2018, p.776). She advocates for a model of strategic communication that recognises the disadvantage experienced by minority publics and creates opportunities for the voices of minorities to be heard (p.784). Agency occurs when minorities have confidence in the communication system and are empowered to use it, as Darcy, Yerbury and Maxwell found through a mobile phone access program trial that was improved when users were supported because they gave feedback that was acted upon (2019, p.541).

A way to ensure that staff and diverse publics have agency is through a sound communication process, which is clearly set out, and with rights and responsibilities documented. A transparent internal communication process to openly discuss discrimination and present challenges empowered employees to have a say because they were given a process to speak up (Lee, Li and Tsai 2021, p.53). In this study, a perception of injustice had prevented employees from speaking up and scholars (Lee, Li and Tsai, 2021, p. 54) argued that better promotion of the process and transparency empowered staff and the organisation was then able to address practices of discrimination.

Voice and listening

In strategic communication, having a voice that counts is essential to being included, but the capacity to speak up varies. While publics have a right to be heard they are not always able to exercise that right. In this context, it is the role of organisations to

establish a process to meet the needs of their publics and give them a voice to give feedback. Voice is a complex concept. Having a voice that counts is more than just speaking, it is about having agency to put forward a view (Couldry, 2010, p. 8). Voice draws attention that leads to acknowledgement and creates a space for inclusion (Couldry, 2010, p. 2). Diverse publics need to be positioned so their voice can be heard. According to Couldry, a critical review of the type of voice that is valued is required because, as members of contemporary society, we have become used to valuing a neoliberal perspective that focuses on economic returns to the private sector. Inclusion requires 'the offer of effective voice [a]s crucial to the legitimacy of modern democracies' as we have grown used to organising society in ways that ignore certain voices (Couldry, 2010, p. 1). Couldry pointed to 'long entrenched inequalities of representation' when referring to minority publics who struggle to achieve the same attention (p. 1) as the majority. He argues for naming 'voice as a value' as a way to shift the focus from the process of speaking up, that is from a mechanism focussing on communications from minority publics, to the valuing of a multiplicity of connections that may be unique (pp. 1-2, 8), that emanate from the organisation's efforts to engage in a process of listening. By critiquing the way voice manifests, the 'processes which obstruct [the] voice' of minority publics can be addressed (pp. 2-3).

The way 'voice' is used in relation to people with disability requires critique because speaking up for oneself is often a challenge. Thill (2015) has suggested that if the voice of disabled people is to be valued, institutions need to structure the way their voices can be heard (p. 40). The practices of organisations are set up to value some voices over others. For people with disability, ableist practices may prevent equal access (Campbell in Thill, 2015, p. 8) and norms on which these are based need to be questioned for social change to become a possibility.

 Thill claimed that voice as a value can positively contribute to the inclusion of people with severe communication impairments, whose citizenship is routinely contravened as it is situated outside of a norm of practice (Meekosha, 2001, Thill, 2015, p. 7). By interrogating who speaks for whom, disabled people can demonstrate how they become the object and lose capacity to speak for themselves when carers and support

workers take up the task (Meekosha, 2001, Ashby, 2011, Thill, 2015). The consequence of this process is disabled people become the subject of interpretation by others, including researchers (Ashby, 2011, Thill, 2015, p. 5). Similarly, people from a NESB may rely on language and cultural interpreters, which reduces their capacity for true engagement. In the context of strategic communication processes, a voice may be heard, but it may not represent what the diverse publics want to communicate.

In addition to focusing on voice, organisations must also focus on listening when negotiating policy between publics in complex environments (Couldry, 2010). Bickford (1996) argued that listening is the missing element in contemporary democratic politics and civil society. She suggested a focus on interpersonal listening and argued that a hierarchy of voice maintains the silence of marginalised voices as a mechanism for maintaining privilege. A selective listening process can lead to oppression when publics lack the power and agency to ensure that their norms of culture are acknowledged in an organisation and become marginalised (Lukes, 1978, Bickford, 1996). Bickford (1996) called for intersubjective listening to include practices of democratic citizenship, termed 'political listening'. Political listening operates through openness, courage, and continuation so that the voices of marginalised people have a chance to be heard (Bickford, 1996, p. 170).

Similarly, Thill (2015) found that the voice of disabled people was systematically marginalised (p. 8). She (2014) argued that oppression works to silence or marginalise certain groups and listening functions to undermine the established norms of practice to foster inclusive practices (p. 2). Thill uses an analogy of music - listening to all of the parts of a musical composition (baseline, melody and so on) in their various intensities allows for the overall richness to be heard, as opposed to privileging one part that is nothing without the other parts (p. 2). In our unequal societies, with their 'long entrenched inequalities of representation' (Couldry, 2010, p.1), voices exist in a hierarchy (Bickford, 1996) and accordingly there are 'hierarchies of attention' (Thill, 2009). A hegemony of normalcy (Barnes, 2012, p.8) results in minorities often being excluded. For example, the communication styles of marginalised voices may not align with those of institutions and when norms are not shared, institutions fail to build

effective communication with minority publics (Bassell, 2017). In these circumstances the 'promise of voice' (Dreher, 2012) will be unrealised for marginalised communities.

Dreher (2010) has called for institutions to initiate opportunities to listen to ethnic minorities by privileging their opportunity to be heard, given that institutions are better placed and resourced to manage the communication process. In line with this, Macnamara (2014) found that while the public communication field values a two-way dialogic approach to communication, listening is narrowly conceived as engagement and haphazardly applied by organisations as their need arises (2014, p. 9). Organisational communication has a greater focus on speaking to benefit the organisation, which is problematic when inclusion is the aim (2014, p. 1). Macnamara (2015) called for organisational listening to go beyond being economically motivated (p. 2) to a genuine exchange (Macnamara, 2014, p. 7). That is, listening should be for the purpose of meeting the diverse and varied needs of all parties. He names this process an 'architecture of listening', and argued that government departments, agencies and authorities need to be responsive to publics if inclusion is the aim (Macnamara, 2015, p. 1).

Macnamara (2016) identified 'seven canons of listening including: recognition, acknowledgement, attention, interpreting, understanding, consideration and responding'. Of these, three have particular relevance when listening to diverse publics who do not fit an organisation's norms of practice. They are: 'giving attention', 'interpreting what others say fairly' and 'understanding others' views' (p. 43). All elements require greater attention to norms of practice, given these publics' needs may sit outside usual communication practices. Misunderstandings occur when different norms of practice operate and anomalies not recognised are not factored into the communication process (Dreher, 2012, Thill, 2015). This demonstrates the complexity and importance of the processes of strategic communication.

Dawson argues inclusion is not simply getting more people through the door, it is developing an inclusive model to involve multiple voices, spaces and publics to disrupt

social reproduction by developing more equitable experiences (Dawson, 2014a, Dawson, 2017, Yalowitz et. al, 2013).

Gaps in the Literature

This review of the literature has shown that there is an extensive practice-based literature that links to the communication theories. The research literature tends to focus on a specific aspect of the communication practices of staff or on the experiences of clients and customers. In spite of this literature, and the commonality of its findings and recommendations for changes to professional practice, issues in the effectiveness of strategic communication practices persist.

Firstly, there is little consideration of the appropriateness of Habermas's theory of communicative action as a foundation for theorising the organisational practices of strategic communication.

Secondly, the literature shows the strength of the normative approach to providing services and products to diverse minority publics that derives from Human Rights treaties and national and state level legislation. The literature suggests that the normative approach in services and products for people with disability can lead to essentialising them. Although there is emphasis on people with disability, the literature gives little attention to ethnically diverse communities, also identified as a minority and struggling to be included. Even though these findings have been in the literature for many years, and suggestions have been made for changes to professional practice, a gap in understanding of how interactions take place in organisations persists.

Thirdly, the literature demonstrates the strength of assumptions made in organisations about what constitutes effective communication practices. Although the importance of two-way communication is emphasised, the power relations that prevent marginalised people's voices from being heard are shown to continue to exist.

Fourthly, a nuanced analysis of the normative approaches evident in strategic communication processes, especially with people with disability and people from

NESB, demonstrates that the distinction between the concept of norms of practice, that is the accepted rules and behaviour of the organisation, and norms of culture, that is the accepted rules and behaviours of the individual or group, are not well understood and thus the implications of this distinction for organisational practices is rarely explored.

Thus, this study aims to address these gaps through the research question: Who's in? Analysing the impact of inclusive communication policy and processes for organisations seeking to include diverse publics and comparing the experiences of specific publics.

In answering this research question, the study will:

- maintain a critical focus on the appropriateness of Habermas's theory of communicative action as a theoretical underpinning, at the same time as demonstrating a concern for the implications for professional practice of such a focus;
- bring together the perspective of the organisation, its staff and the clients and customers in addressing strategic communication processes of inclusion;
- be mindful of those processes which prevent the voices of minority publics being heard;
- explore the relationships between the concepts of norms of culture and norms of practice.

Chapter 3

Methodology

This chapter will map out the methodology used in this study. It presents my approach to the research as an outsider with insider knowledge and discusses the implications for the study. It outlines the research questions, approach to data collection as authorised by the University of Technology Sydney (UTS) Human Research Ethics Committee (HREC) application number ETH17-1120. Information about the selection of organisations and their information and documentation, participants to interview, and note taking is outlined. This section is followed by a description of the way the data was analysed, concern for quality, and justification of the writing up style. The chapter concludes with a reconsideration of the research question.

The research questions

This study is based in the practice of strategic communication. The broad research question asks how the strategic communication processes in organisations providing services to diverse publics lead to "inclusion". Secondary questions targeted at different groups are as follows: firstly, how do organisations present the notion of inclusion in their mission statement? Secondly, how do managers explain what it means for their organisation to be inclusive? This includes how they develop policies and processes and how successful inclusion is measured; and how processes such as feedback are incorporated into the organisation's strategic communication processes to enable engagement of diverse publics. Thirdly, what were the expectations that diverse publics had of the organisation, what problems did they experience with communication about the services provided by the organisation, and how effective were the communication processes of the organisation in resolving those processes?

This research question calls for an exploration of multiple perspectives to understand how inclusion between organisations and their diverse publics occurs, given no one

view can be held (Weerakkody, 2015, p.27). I take an interpretivist approach where meaning is constructed by the researcher as she engages with the data and, as a consequence, creates understanding (Charmaz, 2008, p.398). This approach allows for emerging interpretations to occur and is particularly helpful when engaging across cultures as people bring their own worldview to the exchange. This methodology enabled me, the researcher, to capture rich value laden experiences (Denzin and Lincoln, 2008, p.14).

Insider and Outsider Approaches

My research approach is informed by my position as a communication specialist for government and for-profit clients, as a university lecturer, and as a white, working-class female advocate for people with disability, with some lived experience in this area (Guba, 1990, p.17, Denzin and Lincoln, 2008, p.28). This background prompts me to acknowledge the multiple perspectives at play, and to recognise the importance of taking a constructivist approach to the study. It has also trained me to listen carefully to the responses of diverse interviewees, knowing that listening is harder across cultures because practical and cultural understandings differ and my capacity to hear is limited by my own worldview and experience (Guba, 1990, p.17).

When conducting research, I bring my own worldview and apply it as both an insider who advocates for minorities, and an outsider who does not share cultural norms. This positioning affects my engagement with the communication processes available because I have the advantage of understanding the benefits of proactively listening to people who speak differently to improve inclusion. By the same token, the confidence that derives from this familiarity can mask misunderstanding when meanings are not actually shared but assumed because of the relationship (Shah, 2004, p. 565). Thus, insiders must approach research "with eyes wide open", according to Asselin (2003) because there is no such thing as neutrality, according to feminist writer, Rose, who advocates for open engagement processes. Rose argues the exchange is never neutral, there is only greater or less awareness of bias and what is being left out (1985, p.77). The stories of people cannot be separate from the researcher's role in collecting them,

according to Dwyer and Buckle, who argue that the experience is bound together (2009, p. 61). As a consequence, insider research can be open to criticism because the focus is on relationships rather than the process of sharing information (Fleming, 2018, p.312). Transparency of the process is important to identify any bias, given it can covertly skew results. Fleming advocates for a focus on establishing trustworthiness in the research design phase and argues trustworthiness parallels Creswell's concepts of research quality, that is validity, reliability, and objectivity, for full disclosure as an insider (Fleming, 2018, p.314). Being an insider has benefits because connections are easier to make with likeminded participants and questions can be adjusted to suit the different participants, but worldviews can hinder listening, skew reporting and fail to acknowledge bias if not addressed.

Self-awareness by being reflective and reflexive is important to deconstruct the engagement process and consider the impact of overt and covert processes (Teusner, 2016, p.93). For example, I felt an emotional connection with many of the interviewees because we shared a passion for equal access, but I was unable to know that experience of exclusion because I was an outsider and not excluded. Reflection is a way of thinking productively about an experience rather than focusing on a strategy to address an issue (Boud, 2009, p.10). The worldview of the researcher and the effect of their bias on the exchange is important to identify and assess.

My experience as a professional strategic communicator equips me with skills to seek out and engage publics, but it does not help me engage with groups of diverse publics with whom I do not share meaning. My experience as a carer and advocate for minorities has helped me to listen more carefully to engage more openly with people who communicate differently from me, but it does not allow me to reach them as I may not be privy to the communication networks they use to engage. However, I am also the person who brings a scholarly background to the enquiry. Unlike the participants in this study, I am familiar with the literature on the topic of inclusion of diverse publics, and the purpose of this study is a scholarly one: not to make a change to the processes used by staff, but to add to the knowledge of the academic field of strategic communication.

The research question and the acknowledgement of the multiple perspectives it requires, as well as the complexities brought by the insider/outsider positioning of myself as the researcher, confirm the need to work in the interpretivist paradigm, using a qualitative methodology. This approach allows for emerging interpretations from information constructed by people as they engage with the world they are interpreting (Crotty, 1998), in a socially constructed reality (Robson, 2002) in Teusner, 2016, p.86). Shared meaning builds understanding and creates new interpretations (Charmaz, 2008, p.398) and is particularly relevant for engaging with diverse publics, according to Shah, who explores cross cultural research (2004, p.549). While a quantitative approach may assist with data analysis to count the number and frequency of themes arising in the analysis of interview and website content, it would not provide rich detail of value-laden experiences of engagement and inclusion for minority publics (Denzin and Lincoln, 2008, p.14). An interpretivist perspective encourages researchers to embrace multiple realities, as one single view is impossible given meaning varies between people and groups as replicated in this study to engage with multiple organisations and their multiple publics (Weerakkody 2015, p.27).

Research methodology

This study uses a multi-case study methodology, which allows for the collection of appropriate data to answer the research question from an interpretivist approach. Yin (2003), defines a case study as

> an empirical enquiry that investigates a contemporary phenomenon within its real-life context; when the boundaries between phenomenon and context are not clearly evident … [the case study] copes with the technically distinctive situations in which there will be many more variables of interest than data points (Yin 2003, pp. 13-4)

Case studies usefully investigate questions of "how" or "why" in situations where contemporary phenomena can be explored in their natural environment (Yin, 2009, p.2). Case studies are diverse in their objectives, characteristics, and results because they report on real-life contexts (Della Porta, 2008 p.225). Concurrently, case studies

are known to uncover power, values and causes to explain the social and political world (Vennesson, 2008, p.223). A case study uses one or several cases to analyse complex contemporary phenomena at specific times and places, and from a range of viewpoints to understand multiple realities or perspectives of a range of participants (Weerakkody, 2015, p. 250).

A benefit of choosing a case study methodology is its capacity to analyse overt and covert processes. For example, a contemporary phenomenon such as inclusion expressed overtly through policies and processes and covertly through relationships can be explored in ways that an experiment or survey alone would not achieve (Yin, 2009, p.3). Unique to case study method is managing the large number of factors that impact a phenomenon like inclusion, to identify relationships between them and the phenomenon under investigation (Weerakkody 2015, p.250). These interactions and relationships are examined within a real-life context to understand impacts bounded by time, space and context (Yin, 1994).

A multi-case study methodology was used in this study, as rich data could be drawn from multiple sources within each of three cases to explore and explain how inclusion manifests in real life (Yin, 2009, p.18). The real-life context was important to understand inclusion, the phenomenon under study, but at the same time, phenomena are harder to define clearly because boundaries are not rigid and the space between the phenomena and context is not distinct (Yin 2009, p.18). Case studies are generalisable to theoretical propositions, as is the purpose of this study, not populations (Yin, 2009, p.15). Yin argues the quality of the case study relies on the ability of the investigator (p.16) to ensure that the technical processes are robust and consistently implemented.

The case study methodology allowed me to explore real-world examples of inclusion in organisations, gathering data from the organisations' statements and reports as well as from organisational managers and their publics to compare the intention of inclusion with the reality experienced. A benefit of this approach is it allowed me to analyse multiple sources of data in one case to compare experiences of inclusion to

point to successes and gaps, that one method alone would not achieve. A further benefit of using a case study approach is it had the capacity to analyse overt and covert processes, comparing policies, practices, and experiences. A case, or organisation in this study, facilitated the showcasing of the practices used by staff to include their publics; these cases can serve as models to promote best practice to similar organisations in each business sector. Exemplars can be adopted as part of a strategic communication framework to model practice against, supporting the identification of inclusive communication practices and the challenges faced establishing them.

By interrogating best practice, I hoped to identify communication successes and gaps to understand how they manifest. For this reason, I selected a multi-case study approach where each case represented a business sector as a not-for-profit, government or for-profit organisation, within a range of industries, including consumer advocacy, local government and telecommunications. I did not intend to compare case study experiences but to reveal how diverse publics with equal rights to inclusion in products and services are marginalised.

My case studies were identified through personal experience, backed up by a document search. I identified several organisations with offices in Sydney known to have established inclusive processes for their diverse publics (ACCAN staff personal interview, 2017). I made preliminary approaches to these organisations to engage their willingness to participate in such a study. Once an organisation representing one of the three business sectors agreed to take part in the study, I moved to contacting those organisations in one of the other business sectors until I had agreement from one study site for each sector. Although one subsequently withdrew before data collection, another was selected, and all sectors were covered. The organisations varied in size and remit with the not-for-profit being the smallest organisation with a national purview, the government organisation was large, and its focus was local, and the for-profit was large and national. These dynamics did not appear to affect the data collection process.

This positioning by sector was overtly demonstrated through the manifestation of values inherent in the names given to publics. For example, the not-for-profit publics were known as members, the government were known as clients and the for-profit were known as customers, a point to be kept in mind during the data collection process.

Data Collection

The case study methodology can apply quantitative and qualitative data collection methods to understand phenomena and reflect on their impact. The data collection process follows a specific format using multiple sources of data as triangulation to strengthen verification of the findings, maintain a logical chain of evidence and follow ethical protocols (Weerakkody, 2015, p. 258). A strength of a case study approach is its ability to deal with multiple sources of evidence (Yin, 2009, p.11).

Common techniques used in the design and collection of case study data are content analysis of literature and existing organisational documentation, interviews, and field notes to describe the context of the situation. Their combined attributes create a strong base of evidence that helps to address problems of construct validity and reliability (Yin 2009, p. 101).

These types of data were collected from the field from August 2017 to June 2018.

Participant selection

The organisations' diverse publics were selected for focus because they share the same right to access services and products as all of the organisations' publics, but their specific needs, including access to services, can differ, and they can find it harder to engage with the organisation's communication processes. I aimed to identify how and why successes and challenges occur in the communication process by capturing the experiences of managers whose responsibility it is to provide inclusive services. I compared these experiences with those of diverse customers who joined the organisation expecting to receive inclusive services. The goal was to add to the scholarly understanding of the relationship between inclusion and strategic

communication, and, from a practical perspective, to identify implications for improving communication processes between organisations and their publics, leading to more effective approaches to inclusion.

When I approached organisations, asking them to take part in the study, I asked for access to staff who managed engagement programs for their publics with disability and their publics from a Non-English Speaking Background (NESB). In each instance, I was referred to an individual who was able to provide advice on documentation to review and to indicate relevant staff for me to interview. These senior employees provided background to their approach to inclusion by sharing information about the organisation's values through their goals and priorities for developing policy and processes to include their diverse publics (Weerekoddy, 2015, p. 99). They gave me an overview of the organisation's philosophy and referred me to fourteen managers who specifically engage with publics with a disability and publics from an NESB (Weerekkody, 2015, p.101).

My access to staff from diverse backgrounds mirrored the organisation's offer of inclusion through prioritisation of certain communication structures and the appointment of specialist managers. The positioning of the main contact had an impact on the referrals they made to managers for interview. For example, referral by the senior manager who was part of the operations team of Consumer Advocacy Australia included staff from both policy and communication areas whereas the other organisations' referrals were mostly to policy staff. This clearly would have an impact on the data I could collect, and while I sought to expand the pool of people and interview more communication staff, it was not possible for all organisations because relationships within the organisation were not held nor was it necessarily considered that a communication focus would improve access and inclusion for these publics.

The skills of the managers I interviewed also had an impact on the information I was able to obtain. Some brought little experience of engaging with diverse customers, but extensive managerial skills, and others had lived experience of diversity, be it disability or NESB and few communication skills. Norms of practice connect people who share

them (Ahmed 2012, p.17) so it was not surprising that the managers with lived experience of diversity provided extended discussion about access issues because of their deeper understanding of the impact of policies and processes that other staff were unaware of. They also knew some of their diverse customers and the feedback they gave enabled me to tap into the experiences of their staff and customers in ways I would not otherwise have had as an outsider to the organisation. The familiarity brought also helped me to develop more effective message prompts when interviewing their publics. Access to highly skilled people with lived experience allowed me to learn about their challenges and experiences about which other staff were unaware. In particular, managers with disability had a thorough understanding of their rights under legislation that guided their communication; managers from an NESB described gaps in communication that were filled by staff from similar backgrounds by providing translations and advice on access.

Access to the organisations' diverse publics was harder to achieve and required several different strategies. It was my aim to find three people with disability and three from an NESB to interview for each organisation. I also wanted to ensure I collected a range of views to ensure the views of people in the centre and on the periphery were included (Miles, Huberman and Saldana, 2014, p.37). Interviewees were selected because they were active, aware or latently involved with the organisation, mirroring Miles Huberman and Saldana's 'typical' and 'negative' sampling process to allow for a comparison between extreme experiences and to showcase a range of responses (2014, p.36). By doing so, I avoided only hearing from the most engaged, active and empowered who were the easiest to liaise with and to "decentre" myself with an aim to achieve openness (Miles, Huberman and Saldana, 2014, p.36). Some managers referred me to lists of groups on their website to approach to interview, others referred to groups or organisations that were particularly hard to engage with or more involved, an approach that involved cold calling. It was easier to engage with people with disability through their associations using a snowball process of referral that Weerakkody explains is often easiest to achieve, (2015, p.101). It was harder to find people from a NESB background. In some instances, I organised an invitation to a meeting of a group and approached people directly. At other times, word of mouth

helped to connect with diverse publics to interview. Despite the challenges, I have a robust group of eighteen participants, nine who identify with disability and nine who identify as from an NESB. In addition to those known to be supportive of the organisations, I managed to include clients who were quite marginalised and felt excluded by the organisations.

Organisational documents

Organisations' strategic documents and protocols that describe the professional practices of the organisation and how they operate provide insight about their values and how they manifest in their daily operation through the processes they adopt and the way they highlight them in their communication to their staff and publics. These documents are valuable because they provide information about current practices and innovations from the organisation in an accessible form to the lay person (Pappas and Williams, 2011, p.228). Business reports may not hold the same weight in the academic world as peer reviewed papers, but they are produced by experts and offer early insights about current issues (Pappas and Williams, 2011, p.229). For example, reviewing existing documentation assisted me to quickly orient myself to the organisation and the phenomenon under study by reading its policies and processes. Such a review also provides insight about what is valued and why, as a first point to understand the worldview of the organisation and consider options for further investigation (Woodhams and Corby, 2007). The organisation's documentation demonstrates its goals and how they will be achieved through prioritisation to address their greatest concerns. However, since most organisations have significant amounts of documentation, isolating the most relevant information is an important task for the researcher and being selective about the documentation to use is critical (Yin, 2009, p. 105).

The process of reviewing organisational documentation helps the researcher orient to the field by becoming familiar with its nomenclature, as the language used to describe their business and actions that become normalised according to industry (Davis, 2013). The language used in documentation and the type of processes developed also

conveys their priorities. Scholars advocate for employing this language in research questions to orient interviewees to the question because they are familiar with the terms used and feel more comfortable responding (Charmaz, 2015, p.1613).

I began with a document analysis of industry and government reports that located the organisations in their business sector and I was able to map their values, vision, goals and objectives against their commitment to inclusion as described in their Annual and Sustainability Reports. The reporting period varied for each organisation according to the evolution of their policies on inclusion of their diverse publics. For example, CAA documentary evidence spanned from 2012 when they adopted their first Disability Action Plan to 2017 when interviews were conducted. Metro Council's documents spanned from 2008- when they developed a Cultural Diversity Strategy until 2018 when the last interview was conducted and OzTel documentation spanned from 2016-2018 reflecting their change of operation and customer refocus. The analysis of these reports and industry reports on the benefits and challenges of inclusion of diverse publics gave me an understanding of each organisation's real potential to fulfill their goals as identified by their commitment to inclusion through the allocation of resources to support their diverse publics. In addition, I analysed the reports against external compliance measures including the Disability Discrimination Act 1992 (DDA), Racial Discrimination Act 1975 (RDA), Telecommunication Consumer Protection and Service Standards Act 1999 (TCPSS) and the Convention of the Rights of Persons with Disabilities 2008 (CRPD) as well as internal indicators such as the Community Engagement Plan (CEP), Access and Inclusion Plan (AIP) and Universal Service Guarantee (USG) and these indicators were argued to mark their level of commitment to the inclusion of their diverse publics. The review enabled me to identify gaps and design questions that were pointed to specifically unpack the impact of these gaps on interviewees.

Interviews

Interviewing was the main method used for data collection as is commonly advocated in many professions in this sector, including the media communication field

(Silverman, 2010, p.189). Its application in the social sciences ranges from an individual focus to capture the lived experiences of people to understand their social world by capturing information about their circumstance and opinions through in-depth interviewing (Morris, 2015, p.3). Interviewing is a valuable method of data collection because it can be adapted to meet the needs of the people. It can provide an individual approach to capture their experiences to understand how they see the world (Morris, 2015, p.5).

This study focusses on semi-structured in-depth interviews that ask open-ended questions to give responders scope to elaborate. The semi-structured interview is set up as a conversation where the interviewee and interviewer clarify points that arise in the exchange to share meaning (Morris, 2015, p.10), but the topic is clearly defined, and this "conversation" is not casual but focused. This type of interview relies on interviewers using message prompts to keep on the topic and encourage discussion on the points of investigation. Establishing rapport is important to build trust and create opportunities for the researcher to explore the topic and report on the environment. Depth of discussion can be achieved by repeating the same data collection methods because it builds knowledge to create stronger justification (Morris, 2015, p. 10). This is the best method for capturing the experiences of the diverse publics in this study because the questions are specific to identify inclusion, and the meaning found in responses can be clarified further by adjusting the engagement to suit different access needs. I was able to follow up with questions to prompt the interviewee or be prompted by the interviewee's responses to explore the ideas they raised in further depth and as a strategy to create rapport.

Contextual factors of age, ethnicity, gender and class of the interviewer, and the setting influence the exchange and these relationships must be acknowledged by the researcher if bias is to be minimised (Morris, 2015, p.12). A disadvantage of interviewing is that norms may not be shared and misunderstanding can be harder to recognise for someone who is not part of the culture, as experienced when interviewees did not understand what was meant by feedback (Davis, 2013). Shah argues cross cultural interviewing is a "two-way learning process" to "make meaning"

so separating the interviewer and interviewee is impossible, given misunderstanding and bias occurs in every interview and is increased when culture is not shared (2004, p.552). Morris discusses 'interviewing across difference', as often not achieving the outcome expected (2015, p. 106). Second language speakers can struggle to share meaning and the difficulties experienced can be unknown to interviewers and impact the quality of the research, because misunderstanding is not recognised and therefore not acknowledged (Morris, 2015, p.112). In this instance the interview process is improved when interviewers observe reactions in an exchange to describe when meaning is not shared to improve understanding (Bowen, 2016, p.193).

I experienced a mismatch of understanding when interviewing a person from a Filipino background about her experience of inclusion. She was unable to understand my question about participating in the organisation because she had never had her opinions included, even though the manager described her as actively engaged in the consultation process. Norms were not shared and both interviewee and interviewer made assumptions that covertly prevented them from sharing meaning. The focus is on relationships to improve the quality of the exchange and flow of information but Reinharz and Chase (2002) caution "it may not lead to a superior interview" unless the dimensions of the study are acknowledged (Morris, 2015, p.107). Sharing language or norms can improve access but not data, because the interviewer is focussed on the relationship and can fail to collect the data needed to make the case because it is not obvious to them as an insider (Nairn, 2005, p.236). Likewise, responders can give responses they "think the interviewer wants to hear" to keep their job or because they want to support the interviewer, so they are not seen to 'sell out' to the cause (Davis, 1997), addressing a covert norm not necessarily shared across culture.

Similarly interviewing people with disability raises questions about who interviews whom and why (Kitchin, 2000), highlighting a long history of "speaking for", not with, "disabled people" (Ashby, 2011). Shakespeare, a person with disability, says giving the person the option to revise what is being asked builds a relationship that improves the quality of the outcome of the research for both parties (1996, p.116), presumably educating the interviewer for future engagement (Shah, 2004, Morris, 2015, p.112).

I conducted two series of interviews, one with managers and one with their publics. Interviews with the managers were conducted in their offices in person or by telephone for 45-60 minutes from August 2017 to June 2018 and observations noted during and immediately afterwards. Notes enable the researcher to delve into overt and covert responses to compare her impact on outcomes given "interviews are not neutral tools" (Denzin and Lincoln, 2008, p. 119). Nine questions and pre-tested prompts were asked to gather managers' opinions about how they included their diverse publics. The language to describe their publics, as members, clients and customers or NESB, LOTE or CALD were drawn from the document review and applied in questions to improve familiarity for the interviewee to orientate more seamlessly to the question, (Smith, 2013). The questions focussed on organisational communication policy and processes and included how managers engaged them, if they had a variation of process for publics who needed it and what it was and how it was offered. I asked for examples of success and challenges, lessons learnt, and if feedback had been collected and whether it changed processes. In addition, I asked managers how they promoted engagement differently for diverse publics. I wanted to find out if the organisation would extend their capacity to include beyond compliance to legislation.

I conducted semi-structured in-depth interviews with three of each organisation's publics who identified with disability and three who identified as from a Non-English Speaking Background (NESB). The latter were able to speak English well enough to avoid needing a translator. Seven questions and pre-tested prompts were asked to identify interviewees' experience of, and relationship with, the organisation, to identify how they engaged and if the process was adequate. I asked whether clients were provided with a variation of access, if it was useful, and whether it improved access. I also asked how they found out about variations, whether the promotion was effective or how it might be improved. Finally, I asked interviewees to describe successful inclusion and how they measure it.

Field Notes

Field notes are a qualitative research methodology that comes from an ethnographic analysis of an environment where observations of phenomena in the field are recorded in detail by an observer and are later reflected on to interpret meaning (Tenzek, 2018). In this research approach an observer will report what they see and their interpretation of the exchange at the time (Tenzek, 2018, p.2). It is regarded as an unstructured approach to observation because meaning occurs as a result of 'the researcher and the researched interacting, rather than as a result of a series of structured questions asked of participants where the observer's influence is not acknowledged (Mulhall, 2003, p.307). This type of data collection allows the researcher to compare "what people say they will do, with what they do" through detailed note taking of interactions in the field (Mulhall, 2003, p.308).

Note takers, however, bring their view of the world, understanding of the exchange and observational capacity to the task, which impacts data collection and analysis. The descriptions developed are a representation of the author's construction of reality, not reality in itself (Mulhall, 2003, p.311). Reflective field notes "create a space for the researcher to tap into their own interpretation" of the observation and critically assess what is happening by noting down questions to self to think about and explore (Tenzek, 2018, p.4). Field notes help researchers learn about a phenomenon or group but because they are immersed as an outsider listening in, but it is important to acknowledge their presence and impact on the interpretation of outcomes (Tenzek, 2018, p.5).

Field notes helped me to identify points of significance for the interviewees that were not obvious in transcripts, and they allowed me to draw out these points from the interview data to explore in more detail and consider more deeply. My notes also helped me to identify gaps when compared with questions not answered or answered in ways that suggested there was misunderstanding or more going on. The information helped me to reframe the questions in follow up interviews to make more sense to interviewees and for me to reflect on why the gap had occurred. For example, one of

my NESB interviewees with disability commented that word of mouth was the best way to share information because "most people don't read" and I took that to mean they don't read material from their service provider but on further investigation and re-reading of my notes I understood she meant they did not read English or read at all. Therefore, the interviewee was completely excluded, and the organisation was unaware. Note taking allowed me to reflect on her other responses and piece together a much larger degree of exclusion than I had understood, and the level of detail improved my analysis.

The combination of field notes, interview transcripts and observations to identify connections and incongruencies provides the "rich context" (Lashley, 2018) that enables the researcher to achieve a metasynthesis that improves the credibility of the process (Phillippi, et. al. 2018, p.382). The analysis seeks out patterns and raises questions about phenomena that continually feedback so early collection and reflection on data informs the future focus to build understanding (Phillippi, et. al.2018, p.386).

Data Analysis

The process of analysing data comprises examining, categorising, tabulating, testing or recombining evidence to draw empirically based conclusions (Yin, 2009, p.126) and in qualitative research, will involve interpretation of the data collected. The analysis of qualitative data aims to provide "insight to the qualities of communication, meanings, language and social interactions" to understand meaning held by participants and how they come to be through processes, rules and categories (Leeman and Novak, 2018, p.1). In other words, analysis of content and its meaning is essential to qualitative research.

The role of the researcher is not separate from the data collected nor from analysis of content, as meaning is found within a specific context as attributed by the group or culture (Krippendorff 1989, p.403). Krippner argues that content analysis goes beyond the observable to incorporate cognitive consequences of participants as covert within the exchange (1989, p. 403). The analysis of data compares noted interactions

gathered from documentation, interviews, observations, and field notes, to expected interactions based on experience, best practice or theoretical models to identify a shift for reporting (Bowen, 2016, p.217), but it is important not to see this comparison as a mechanical or purely a technical process. This data analysis approach is naturally affected by the researcher's assessment of the environment and their logic in analysing the data to understand the exchange (Bowen, 2016, p.217).

Content analysis focuses on a unit such as text to capture verbal, written and observed interactions that are compressed into categories based on explicit rules of coding (Stemler, 2001, p.1). It uses a systematic process of design, definition of the unit of analysis, coding, drawing inferences and validation (Krippendorff 1989, p. 406.7). Thus, Weber argues, the systematic nature of the process allows researchers to discover and describe individual, group, institution, and social interactions in a timely way (1990).

The structure of the approach allows researchers to systematically scan for themes and identify trends and patterns. A thematic analysis systematically identifies, organises, and enables the researcher to create insight about patterns of meaning (themes), across a data set for the researcher to make sense of the collective or shared meanings and experiences (Braun and Clarke, 2012, p.57). The aim is to identify commonalities within the data and to find out how these commonalities are distributed to make sense of interactions in relation to the question under analysis (2012, p. 57). The analysis produces answers to questions that are not always apparent at the outset of process but become important as a result of research collected about an issue (Braun and Clarke, 2012, p.58). This approach also enables researchers to focus on a phenomenon like inclusion to analyse how it occurs, and whether it is equally shared across a cohort. Thematic analysis allows for semantic and latent meanings and experiences to be unpacked to expose assumptions and reveal hidden agendas (Braun and Clarke 2012, p. 58). Stemler and Bebell (1998) note that a thematic analysis is helpful when comparing statements that describe organisational values with the experiences of users to observe whether the program objectives align with user expectations (Stemler, 2001, p.1), an aspect of particular relevance to this study.

In my research, the transcripts of the interviews and the reports formed the basis of the data for analysis. I undertook several close readings, taking notes in the process to identify ideas for themes that were emerging. I also developed a draft coding frame based on the literature. After testing the coding frame and modifying it, I used it to establish a spreadsheet. My first step in analysing the transcripts was to draw together the answers from all the participants to each question. This made the process of identifying similarities and differences in the answers simpler. From this, I began the process of identifying the emergent themes and developed a mind map of these themes and the connections among and between them. Through this process applied to the first case, key themes emerged. However, in applying these themes to the data from the other cases, mismatches occurred, and it became apparent that there was unexplored richness in the data. Thus, I implemented the same process with each of the cases separately, isolating themes and mind-mapping them to create an analytical frame. The process of integrating the mind-maps was useful in bringing out the central themes of relevance to the research question across all the cases. This enabled a focus on the challenges for each business sector in meeting their goals of inclusion.

Quality

Quality is achieved when a study is evaluated against the criteria of credibility, transferability, dependability and confirmability (Lincoln and Guba, 1985). Credibility refers to the belief that the research findings make sense and represent an accurate interpretation of the data. A credible study is seen as authoritative in its field. Credibility relies on "lengthy and intensive contact with the phenomena […] in the field", persistent observation, triangulation of data, and peer debriefing (Lincoln & Guba 1986, p. 77). Researchers can work to ensure credibility in their study by sharing their findings with other researchers to assess if they "ring true", thus gaining a measure of validation from other scholars (Colorafi and Evans, 2016, p. 8).

In my research credibility was founded upon establishing a conducive environment where interviewees were able to speak freely about their experiences (Mason, 1996) and the interviewer able to record them and explain the context with accuracy. To

orientate interviewees, I spent time explaining my interest in inclusion and why it was important to me to create an open environment to share ideas and I felt that made people feel comfortable discussing their experiences. In addition, and prior to interviewing, I reviewed each organisation's documentation to identify the norms of practice and their application of nomenclature relating to diversity and inclusion to apply the same processes and terms in my questions to create a familiar exchange for interviewees and improve their understanding of the questions. This approach was adopted following Charmaz's advice that participants are more likely to answer questions using terms they are familiar with (2015, p.1513). The prework helped me create an exchange and questions that aimed to be inclusive and to ask about inclusion.

In Australia, the National Health and Medical Research Council's code for responsible research sets out standards of credibility and community trust (NHMRC, 2018). A statement of Ethical Conduct of Human Research outlines the process and includes values and principles of ethical conduct, themes as risk, benefit and consent in simple and more complex situations, ethical design, development, review processes, and the specifics relating to the inquiry or people to be engaged (NSECHR, 2018). They include processes to ensure confidentiality will be maintained, how to approach participants to ensure they do not feel obliged and are afforded the access they need by listening carefully to their feedback. The processes provide an ethos to guide engagement in human research by reducing risk, supporting care in planning and by being ethically sensitive (2018). The UTS HREC criteria ETH17-1120 ensured the research conducted met the standards outlined.

A standard process for ensuring quality is important, but it can enforce rigidity in methods of interpretation by disregarding theoretically sensitive, reflexive and deliberative engagement and contradicting values of flexibility and openness (Braun and Clarke, 2021, p.329 and p.331). Thus an interpretivist and critical lens that is filtered by culture, social, political, and ability is essential to understanding at the outset according to Lincoln and Guba (2013, p.10). The importance of the researcher's subjectivity as an analytic resource becomes apparent, as does their reflexive

engagement with theory, data, and interpretation to understand their perspective (Braun and Clarke, 2021, p. 330).

The semi-structured interview process offered a level of flexibility so that I could adjust questions when I realised the interviewee misunderstood or the question was irrelevant to them. By doing so I was able to build trust with diverse publics by listening carefully and it enabled me to gather rich data (Morris, 2015, p.5). Likewise, I built trust with managers because we shared a professional interest. This meant that initially each was open to the exchange but as the questions became more probing, each became more cautious. I was mindful that they were speaking as the face of the organisation and therefore presenting their policies and practices in the best light. Despite any barriers the managers may have faced in being able to reflect on the organisation's processes, my data was not significantly undermined because of my approach to analysis which enabled me to be aware of gaps and to 'read between the lines', for example, by comparing the documentation on the policies and processes that was available with the interview data.

Interviews were accompanied by observations and informed the context by recording non-verbal actions and conversational cues to provide further insight about the engagement. The observations were transferred into detailed notes, that were read in conjunction with interview transcripts multiple times. This process enabled me to identify inconsistencies and points of emphasis to follow up on to create a "rich context" (Lashley 2018) that improves credibility (Phillippi, et., al, 2018, p.382).

By using multiple sources of data including a literature review, document analysis, interviews, observations and field notes, I was able to identify consistent and inconsistent themes that prompted me to explore communication gaps for diverse publics. This process allowed me to compare "what people say they will do, with what they do" (Mulhall 2003, p. 3018).

The process of triangulation provides an increased confidence in the data because it combines multiple sources and methods to confirm the participants' original views and I found it consolidated themes of access and engagement if inclusion was the aim for

diverse publics (Lincoln and Guba, 1985). Credibility of the process was further improved when interviewees gave feedback about the questions asked and they often included new points to explore. Their views helped me recognise my bias in terms of the data collection process and to acknowledge my limitations as an outsider (see also Shah 2004, p.553).

Reporting on the information collection process by describing, in detail, the context of where the data was collected and the circumstances at the time, ensured the quality of the data remained true. I found the members, clients and customers of the organisation were more interested in providing detail about their experience than managers who were more focussed on showcasing their inclusive services. The environment was conducive to collecting data but the type of information shared reflected the motivation of the participant. In some interviews I was not able to control the environment and it affected the depth of data collected. For example, I interviewed some people in the park and they were interrupted by their friends or children, so it was convenient but not always a conducive way to maintain dialogue with them (Morris, 2015, p.3).

Transferability assesses the study's likelihood of having a broader application in another setting (Colorafi, and Evans, 2016, p.8). Lincoln and Guba argue that it is the responsibility of the reader to make this judgement, while the responsibility of the researcher is "to provide the database that makes transferability judgements possible" (1985, p. 316). This involves describing in detail the findings and setting the data in its context, providing a level of detail that would enable others to make critical evaluations of the study.

Transferability is addressed by the adoption of a systematic application of data collection methods informed by a thick description of the behaviour, experiences, and context for the meaning of inclusion to be shared (Sim and Sharp, 1998). I selected one organisation known as an exemplar of inclusive practice for diverse publics for each of the business sectors of not-for-profit, government and for-profit. I took this approach

because I was able to apply the same criteria to other organisations according to their sector to identify organisational structures and processes that impact inclusion.

Dependability was achieved by fostering consistency of the data collection procedures across participants over time (Colorafi and Evans, 2016, p.7) and maintaining a record of the data collection process through an audit system that was logical and justified decision-making (Teusner, 2016, p.92). Quality control was maintained when the investigative processes were clearly outlined and linked to the research questions, conceptual theory and connected the data analysis to theoretical constructs (Miles, Huberman, Saldana, 2014).

Confirmability was addressed by explicitly describing the study's methods and procedures; collection of data, analysis and audit trail; reporting personal assumptions and bias and the process of retaining the data and making it available on request (Colorafi and Evans 2016, p.7). It was achieved by presentation of the data at various conferences, publication of a case study in a peer reviewed publication, which has been cited, and through feedback from the exposure to scholars and professionals to confirm the challenges identified.

Reflexivity was important to allow the researcher to critically assess their level of engagement in the research process and its impact on participants and phenomena to identify bias, preferencing, and preconceptions of how the exchange would play out (Lincoln and Guba, 1985). Through self-awareness and being reflexive about my own role, I am able to describe some of my impact on data collection and analysis (Korstjens and Moser, 2018, p.123). It is particularly helpful for the researcher to understand their personal position and how it informed the exchange to improve their ability to understand how meaning occurs.

This study was limited by the researcher's worldview and approach to engagement (Denzin and Lincoln, 2008, p.28). Access to organisations and the managers' referral processes had an impact on the quality of data collected. For example, because some managers held relationships with diverse publics they provided more extensive information whereas information from managers who did not hold a strong

relationship or were latent publics, was limited because they were not as engaged (Miles, Huberman and Saldana, 2014, p.37). The interviewer-interviewee relationship impacts the quality of data collection (Morris, 2015, p.13) and reporting on its status is particularly important when engaging with diverse publics whose voice can be marginalised (Couldry, 2009, p.359). Further a multi case study approach by industry sector produced a microcosm of society that cannot be replicated (Weerakoddy, 2015 p. 265). However, the data collected provides a rich account of the experiences of people who are rarely heard in an environment where their inclusion is the focus. A structured approach to interview only people who managed or identified as one of the publics of focus meant few interviews were conducted but the ones that were, were of high quality and "value-laden" for capturing the experiences of engagement and inclusion of diverse publics (Denzin and Lincoln, 2008, p.14).

Writing up the Study

My approach to writing up this multi-case study was to present each case separately, to maintain the integrity of each case, argued by Herriott and Firestone as a more robust approach (1983). This enabled me to draw attention to the way organisations in each sector worked differently towards inclusion of diverse publics (Daymon and Demetrious, 2014). Having set out the findings from each case, I was able to draw out points of significance across all the cases in the discussion section, to demonstrate the contributions that this study has made to the broader literature, through its multi-case approach.

Conclusion

This chapter has explained the investigation into organisational communication policies and practices for diverse publics and compared their experiences with the services provided to identify inclusion and exclusion.

The broad research questions of why diverse publics with equal rights to inclusion are excluded and the impact of strategic communication processes to fulfill managers' commitment were identified by a document analysis, interviews, observations, and field notes. The three narrow questions were answered by data gathered from specific sources. By following a systematic data collection process across three case studies, data about real life experiences was able to be collected and analysed thematically to isolate themes that described inclusion for interviewees. This data was complemented by organisational documentation and industry reports. Concern for quality was addressed by evaluating practice against Lincoln and Guba's model of trustworthiness to demonstrate rigour of process (1985).

Chapter 4

Challenging organisational norms of access for people with disability and people from a NESB: a not-for-profit case study

Introduction

This is the first of three case studies examining the communication frameworks and processes that organisations with an agenda to include minority publics use to create access and engage them. This case study is a not-for-profit member organisation and it will be referred to as Consumer Advocacy Australia (CAA). CAA is known as a significant communications consumer organisation representing consumers in the public interest to provide goods and services across telecommunication, broadcasting, internet and online platforms (CAA, Annual Report, 2018, p.4). CAA is funded by the Commonwealth of Australia to achieve their goals of improved accessible and affordable service for all customers (Annual Report, 2018, p.2, Strategic Plan, 2016, p.63).

This not-for-profit organisation was selected because of its reputation for providing access to service for all publics, including its members, and for establishing targeted consultation for identified consumer groups that require a specific approach for access (CAA, Consumer Representation Review, 2016 p.6). This case study complements but differs from the government and for-profit organisation case studies (set out in the following chapters) to reflect their business goals for equitable service and profit-making, respectively. The findings of this study show how goals vary by business sector and demonstrates the value organisations place on inclusion of their diverse publics. These findings across the three chapters demonstrate the priorities arising for organisations according to their business sector and this allows the researcher to compare experiences within and across sectors.

CAA is a small national organisation with 14 staff and more than 100 organisational and individual members (CAA, Annual Report, 2018, p.4). They represent telecommunication consumers, by participating in more than thirty government and

other external committees and making submissions on behalf of government and regulatory bodies and promoting their work widely through media (CAA, 2018, p.4). CAA advocate for equal access for all consumers and empower them to make informed choices about the products and services they purchase (CAA Submission to Review, p.6, 2016). They administer community grant funding that is allocated by government (CAA, Constitution, 2012).

CAA include a broad number of publics as part of their advocacy work because of their established engagement and outreach programs and representation on external committees (CAA Annual Report, 2018, p.12,13). Opportunities to collaborate enable CAA to develop relationships that extend their reach and improve their ability to advocate. This approach to engagement differs from the approach taken by the other two organisations. They separated attention to their minority publics in ways that they argue allowed them to achieve better attention and provide specific support. These processes are explored in greater depth and analysed according to alignment with each organisation's strategic focus and their effect on inclusion becomes a feature of the discussion in Chapter 7.

This case study highlights the benefits of taking an issues-based approach to engage a wider range of publics rather than exclusively segmenting publics according to a group of which they may be a member. It demonstrates the value of combining an issues-based focus to draw widely from the public, with a strategic process to engage specific publics according to their access requirements. The general and specific focus is improved by feedback on current processes from advisory forums for members in the categories: Indigenous, Disability and Small Business (CAA Annual Report, 2018, p.14). The forums allow CAA to hear directly from industry representatives to raise issues and guide action. CAA's engagement structure is designed to maximise an exchange of ideas to learn from one another. The relationships established enable views to be more freely exchanged because people are more likely to be listened to. The communication process empowers discussants to engage, and expertise on how to do this, as well as information on the topic, is developed, creating greater depth of discussion.

CAA's strategic communication approach

A strategic communication approach to advocacy on behalf of CAA's members as individuals, small businesses and not-for profit groups is essential for the organisation to achieve their goals given limited staffing and resources. While CAA's particular focus is consumers for whom "the market is not working", their aim to proactively ensure equal access is achieved for all consumers (CAA Annual Report, 2018, p.2). For this reason, many groups representing disadvantaged individuals become members of CAA to ensure their specific access needs are advocated for. Current membership includes community legal centres, disability advocates, Indigenous organisations, financial counsellors, regional organisations, farmers' federations, parents' groups, seniors' organisations as well as individual members (CAA Submission to Review of Telecommunications Act, 2016, p.2).

The CAA strategic plan guides activities to meet their constitutional terms and operational guidelines as agreed by the Board and funded by the government (Annual Report, 2017, p.2). A vision for "communications services that are available, accessible and affordable for consumers" drives their strategic direction (CAA Strategic Plan, 2012-2017). Embedded in the plan are CAA's mission and values that inform their strategic goals and prioritise reporting success against. The alignment between principles is guided by objectives that set out a process to achieve the organisation's goals and adhere to their vision, mission and values. In one sense, a well-designed strategic approach to communication may be seen as limiting the focus to particular criteria, however, CAA use it to their advantage, knowing they have limited staff and resources to achieve their goals. In this way a strategic approach allows them to achieve their aims because they maximise their reach by drawing on relationships held with advisory groups, the committees they are part of and their "extensive alumni" of people who share values and are passionate about advocacy work to achieve these goals (Margo, 2017).

This focussed approach demonstrated a minimalist organisational structure comprising a CEO reporting to the Board with direct reports from the Manager of Operations, Director of Policy, Director of Communications and specialist staff relevant to each portfolio, including: Disability Policy Officer, Policy Analyst, Policy Officer, Grants and Research Officer, Consumer Engagement and Membership Officer, Digital Communication Officer and support staff. These roles show CAA's focus is to advocate through policy, accessibility and communication.

The team is small, but they operate within a culture where they all work together to share information because inclusion is valued and these attributes contribute to their advocacy work (Fiona, 2017). Staff also have experience working with a wide range of publics including government and industry representatives, and some staff have lived experience of diversity. These attributes combine to create an environment where people are encouraged to listen and support one another, mimicking the environment they aim to establish for their consumers. The parallels found in the workplace reflect an organisation that values different opinions and strives to know how to include a range of publics in their work.

CAA's formal communication processes include operational documents and processes to maximise their reach and these are strengthened by informal communication processes made possible by working with people with lived experience of diversity and with expert advocates.

CAA's Formal Documents to guide communication

The CAA's formal communication documents include their Constitution (2012), Strategic Plan (2017), Disability Action Plan (2015-2017) and Reconciliation Action Plan (2012-2014). These documents guide CAA's operation and the values they place on inclusion of their specific publics. The documents track success and identify areas for greater focus. Progress is reported in the Annual Report outlining advocacy negotiations, policy submissions, research and formal reviews (CAA Annual Report, 2017-2018, p.5-7). The annual reports guide the organisation to achieve their goals as outlined in the 2012-2017 Constitution and demonstrate their priorities by the

inclusion of the Disability Action Plan and the Reconciliation Action Plan. A review of consumer representation acknowledges the CAA model of consumer representation as valuable and effective and recommends it 'remain unchanged' (Consumer Representation Review, 2016, p.59).

A summary of the attributes that demonstrate the relationship between each document and the organisation's advocacy role in the context of strategic communication follows.

The strategic communication plan guides CAA's communication with their publics to achieve their vision of "communications services that are available, accessible and affordable for all consumers" (CAA Strategic Plan, 2012-2017). They do so by upholding their mission, "to represent the needs of consumers and the public interest with particular attention to the needs of consumers for whom the market is not working; inspire, inform, enable and equip consumers to act in their own interests; research emerging consumer communications issues to provide evidence-based policy advice" (CAA Strategic Plan, 2012-2017).

The mission is underpinned by values "to act with courage, integrity and independence; operate openly, efficiently and effectively; be accessible and inclusive, consistent with the high value we place on diversity; recognise that building relationships with members, community groups, industry regulators and government is critical to achieving our goals; value volunteers, staff and members for their crucial role in our organisation" (CAA Strategic Plan, 2012-2017). These attributes are embedded and reported against because they are valued by staff and customers, and they become an intrinsic part of the strategic approach to engagement by balancing limited resources with action to achieve their advocacy goals.

Five strategic goals guide CAA's activities to influence the government and industry so the communication market is fair and inclusive for all; to protect communications standards and consumers' privacy and security; to enable consumers to make

informed choices; to identify and engage on emerging communication issues and technologies; to ensure adequate and sustainable resources for effective operations (CAA Strategic plan, 2012-2017). The goals are activated by a series of objectives to describe the methods used to achieve each one and how success is to be measured to identify gaps which need to be addressed. The connection between goal and objectives, as applied within a culture that openly aims to include all publics and especially diverse publics, reflects a communication system that values an exchange that is inclusive.

The interconnectedness between mission, values, goals and objectives of CAA and their member publics creates a communication framework that can build a culture of inclusion when the voices of their publics are empowered to speak up and impact engagement. The organisation's approach to engagement reflects their organisational culture as advocate and it is improved when a strategic communication approach prioritises engagement with publics who raise issues, including those who may traditionally not have a forum for raising their concerns. Organisational values reflect the business sector of not-for-profit member organisations where advocacy and inclusion are prioritised. The organisation's strategic communication approach is influenced by the values they operate by and affects all their communication systems including their attention to their diverse publics.

Inclusion of the Disability Action Plan (DAP) as a key document to guide CAA engagement processes demonstrates their commitment to include all people with disability to ensure their materials are accessible, affordable and available (CAA DAP, 2017). CAA strive to become a model for inclusion for all not-for-profit, industry and government organisations for people with disability. The plan aligns CAA's strategic principles of vision, mission, goals and objectives with their DAP goals and objectives of eliminating discrimination, complying with the Disability Discrimination Act and UN Convention on the Rights of Persons with Disabilities (CAA, DAP, 2015-17, p.2). The action plan focusses on staff training and awareness of disability, and advice on effective communication, including providing information for staff to use to connect with the Deaf and hearing impaired in all their external communication. Sharing

information through different media and technologies to suit different publics, including using SMS, training staff to receive information via teletypewriter (TTY) services and for disability issues to be considered as part of mainstream issues are fundamental to the DAP (CAA, DAP, 2015-17, p.7).

Likewise, the Reconciliation Action Plan (RAP) demonstrates CAA's commitment to engage with respect and to build relationships that value Indigenous people and communities by creating better access and support services (RAP, 2012-2014). Goals include improved access, positive partnerships, eliminating discrimination, addressing the digital divide and modelling effective engagement through respectful collaboration and cultural exchange to inspire other sectors to improve processes (RAP, 2012, p.9). RAP goals and objectives are aligned with CAA goals and objectives with the aim of improving representation and access for people from Aboriginal and Torres Strait Islander backgrounds. A focus on relationship building, developing cultural competence of staff and identifying better ways of engaging aims to increase awareness of barriers and looks to improve access and inclusion and are integral to this plan (CAA RAP, 2012, p. 11).

These documents, while discrete, align strategically to demonstrate the CAA's commitment to include their publics, especially their diverse and harder to reach publics for a small not-for-profit organisation with a broad remit. The documents guide the communication processes that create engagement opportunities because staff learn about the communication needs of their publics and how to establish pathways to include them.

CAA's Communication processes

The communication processes are set up to extend CAA's reach by engaging with their partner organisations to also share and promote information to their members and provide their feedback. By establishing mutually rewarding relationships with organisations as advisors, small organisations can extend their reach more effectively. CAA have established a number of formal communication processes to share information with their members and the wider community and to secure feedback.

These processes and the associated feedback are used to support representations to government and industry on behalf of their members.

The processes include standing advisory forums, representation on government and industry committees, participation at conferences and industry events, and through feedback provided via media interactions (CAA Annual Report, 2017-2018). A Grants Program offers consumers a pathway to apply for support to address their specific telecommunications issues, and publications on research jointly supported by academics and industry on current issues are shared by CAA and their partners (CAA Annual Report, 2017-18).

Four standing advisory committees were created by inviting representatives of specific consumer groups to contribute to discussion about telecommunication issues important to them. They include: the members' advisory forum encompassing all CAA activity and policy work, the disability advisory forum with a focus on access and suitability of products for people with disability, the Indigenous advisory forum focussing on suitability of services for Indigenous people often in remote locations, and the small business advisory forum to ensure the voice of small business is heard at government level (CAA, website, 12.2017). This model of communication enables CAA to engage with multiple publics who have similar interests in one forum where they can raise concerns and develop responses that are appropriate to their needs (CAA, Annual Report, 2017-18 p. 10). It is a cost and time efficient way for CAA to engage with its many stakeholders effectively, given its limited resources and staff.

Similarly, CAA staff sit on external industry and government committees and contribute to discussions by advocating for their members and sharing information with their members to ensure access issues are raised and considered. These consultations have resulted in a number of positive changes for consumers. (CAA Annual Report, 2017, p5). The opportunity to share information with interested parties and to comment in the context of these committees establishes an environment where relationships are built because mutual goals are recognised, and solutions are found that could be applied in other situations.

The annual report for 2017 shows that CAA was active in supporting the needs and interests of its members through a number of channels, with the preparation of submissions being particularly important. (CAA Annual Report, 2017, p.6-7). Demands included in submissions made in the period 2017-18 covered topics such as: "better communications for poorly served areas"," improved consumer safeguards and better regulation" and "improved accessibility and affordable communications".

CAA manage an Independent Grants Program for communities to apply to fund initiatives to support their community needs. In 2017-18, this program attracted more than 50 applications and disbursed over $400,000. The program benefits the applicants by empowering them to address their own needs and the information becomes a resource to justify action and to share among communities experiencing similar issues. Funded projects have included information provision for people with disability and assisting people with disability to use smartphones to connect to their community. A review of the program found it unified the consumer voice into a single strategic direction because it supported all member groups to apply (Submission to Review, 2016, p.60). While some applications may not have been successful, applicants were able to raise their issue and CAA included their points in other advocacy work. The research conducted and the data collected provides evidence to support their policy positions and consumer education activities (Review CAA Funding, 2016, p.60). Further research with academic and industry partners has resulted in several publications extending debate on various points of concern for members (CAA, Annual Report 2017-18, p.18-19).

CAA holds an annual conference that brings together government and industry leaders to exchange information about their latest developments and direction for the future. More than 200 delegates attended in 2017 and the resources arising from case studies and best practices were reported on in the organisations of attendees. The resulting resources were distributed widely across the sector and placed on their websites and in accessible portals for members to share (CAA Annual Report, 2017-18, p. 4). Similarly, CAA have had a presence at specifically targeted industry conferences and events organised by member organisations, including the Federation of Ethnic

Communities Council of Australia (FECCA) and People with Disability Conference, (CAA, Annual Report, 2017-2018 p.12). Industry events assist CAA to understand their members, and the exchange allows members to share up to date resources that improve access and inclusion.

CAA's commitment to inclusion is demonstrated through the proactive role they take in policy debates and by the submission of position statements to government to advocate for the views of their members (CCA Annual Report, 2018, p.4). Contributions to an Accessible Telecoms Project funded by the NDIA were informed by contributions from their members. An inclusive attitude is formally recognised by the establishment of communication policies and processes to guide engagement with their publics and represent them through focussed "public discussions on trusted, inclusive and available communications services for all Australians" (CAA, Annual Report, 2019, p.5).

CAA is proud to be known as the "go to organisation for media comments and information on consumer issues in the telecommunication industry" and they share information via media discussion, blog posts, webpage, social media, Facebook, tweets and through their partners directly with consumers (CAA, Annual Report, 2017-18 p.10-11). The communication process strategically delivers maximum reach because mutually effective collaboration extends engagement and multiple formats are adapted for accessibility and language as required. A range of tip sheets and educational materials and resources including how to apply for telecommunications compensation, posters on how to make a complaint, magazines and promotion of the Grants project are also shared on the CAA website with partners in a variety of formats (CAA, Annual Report, 2017-2018, p.10). By collaborating with partners and having them adapt materials to suit their publics, CAA can extend their reach and share resources broadly.

Managers and their experience of offering inclusion

Six CAA managers were interviewed and their experience offering access and engagement is described.

Managers and their reporting structure

Of the six managers interviewed, two were part of the three-person executive, two reported to the Director of Policy and two reported to the CEO. This small organisation has a flat structure that allowed for good access between the Executive, the Board and their staff. This enabled them to share their passion for advocacy and inspire each other to work to goals of inclusion. An advantage of being a small team is they can collaborate and maximise engagement opportunities by sharing experiences and opportunities for their members and, "especially those that the market fails to include" (CAA, Mission Statement, Strategic Plan, 2012-2017). While the organisation is small, staff are carefully selected for their expertise, mentored by an experienced team and encouraged to collaborate to strategically maximise their reach (Margo, 2017). This collaborative environment creates a culture of inclusion that managers and members described as coming "from the top" of the organisation (Margo, Bruno, Will, 2017). This environment and a strategic communication framework support CAA to achieve their vision and mission of inclusion. The combination of a culture of inclusion and a strategic plan to maximise connections extends opportunities for advocacy that would not be achieved without the connections.

Following is a description of each manager, their role, link to the organisation's strategic direction and their personal commitment to the role as expressed in the interview. Pseudonyms are used throughout.

Margo is the Operations Manager, and has extensive experience in the data and telecommunications field managing research and advocating for minorities. She has held executive positions in several government, industry and not-for-profit organisations and sits on a joint technical committee to represent consumers in standards and policy making at national and international levels. Margo takes a

strategic approach "to achieve the KPIs" set and aims to maintain the "integrity" of the process, that CAA are known for (Margo, 2017). She and the CEO ensure the Strategic Plan (2012-2017) is applied and the Disability Action Plan (2017) and Reconciliation Action Plan (2015) are embedded in their operational processes. According to Margo, CAA's operational success was attributed to having staff with "solid" expertise and "lived experience" of diversity (Margo, 2017). Margo is proud of the work they do to create the "integrity" CAA are known for. A review of service conducted in 2016 recognised CAA as "a unified, coordinated voice for consumers in the communication industry" that offered quality participation and achieved advocacy for their members and the general population (CAA, Review, 2016, p.13). Margo did not say if she identified with disability or was from an NESB.

Gavin is a Policy Advisor Disability and he has extensive experience liaising with disability advocacy groups. This work includes liaising with their member groups and he is especially focussed on the 25-30 per cent of members who represent people with disability. He is particularly focussed on ensuring the Disability Action Plan (2017) and Human Rights Legislation are adhered to. Gavin aims to build an "evidence base" and use it to argue for the support their members' needs through more inclusive policies. Gavin has found similar issues are raised about telecommunications by all members, not specifically people with disability, and he advocates for a holistic approach to inclusion (2017). Conversely, he acknowledges access can differ and needs to be considered for people with physical impairment or intellectual impairment that might require additional resourcing to enable engagement. He encapsulates this when he says: "taking a broad and narrow approach to inclusion is needed" (Gavin, 2017). Gavin is a passionate advocate of people with disability to ensure their voice is heard (2017). He identifies as a person with vision impairment and his lived experience is regarded by CAA to contribute positively to their advocacy work (Margo, James, Bruno, Will 2017).

Fiona is the Director of Policy and her experience comes from ensuring government regulatory authorities and industry are held accountable and provide the service they advertise. She works to CAA goals of transparency and integrity to gather evidence and

make a case to propose change when policies are not able to achieve equal access for their members and the wider community. Fiona has worked in the policy area of not-for-profits advocating for improved service for their members and her recent work has focussed on the telecommunications sector. She is extremely knowledgeable about how to present evidence and argue for improved service and she strives to ensure the process is fair for all. Fiona did not identify with disability or as being from an NESB.

Noah is a policy officer reporting to Fiona. He works with member groups, interns and scholarship students to gather evidence about their telecommunications issues and assists them to present it effectively to advocate for change. He is passionate about ensuring Indigenous communities are fairly included especially given complexities around remote locations and lack of verifying documentation contributing to exclusion. Noah did not identify with disability or from an NESB. But he did identify as a New Zealander with experience working alongside of Indigenous publics.

Branden is the Manager Communication. He works with the Policy Team to ensure their messaging is clear and to unpack complexities in the information they are distributing from government and the telecommunication industry. Branden aims to provide information in easy English to maximise reach and he works with member groups to identify the best method of circulating information to ensure engagement (2017). He applies the Strategic Plan to ensure his approach to inclusion aligns (2012-2017). Branden did not identify with disability or from an NESB.

James is the Manager Digital and Web Services. He ensures all CAA materials are clearly presented and accessible through online technologies. He works at the cutting edge of technology and brings new ideas to improve engagement and encourages uptake of new developments by trialing options. James is regarded as an Australian expert in web development according to Margo and he uses his skills to identify barriers and problem-solve by tracking success (2017). James works closely with member groups to gather their feedback and apply it to ensure their online access needs have been addressed or solutions explored. He also supports grant recipients to achieve the communication tools they need. The website has achieved a AAA rating for

access and it has become the model to strive for (James, 2017). James continues to explore new ways of improving access to information and presenting it. He did not identify with disability or as being from an NESB but he did identify as a passionate advocate and tech guru.

The managers were selected by a snowball process after referral by the first interviewee, Margo the Operations Manager. Each Manager was selected because they managed the application of policy or communication for CAA and they specifically established engagement with consumers who identified with disability and were from an NESB. Fiona and Noah from the Policy area were interviewed together to hear how they engaged with their consumers and obtained feedback. Branden and James from the Communication/digital and web service area were also interviewed together because their approach to communication was complementary for understanding engagement processes. The managers' and customers' experience of access, engagement and inclusion are described according to themes arising from the interview data and reported in the following two sections under managers and consumers separately. A discussion follows.

Managers' experience engaging their diverse customers

From the interviews conducted with the six staff members, two themes arose. One focussed on the impact of the organisation's culture of inclusion on the implementation of the strategic plan and the second theme focussed on CAA's strategic approach to engagement by establishing processes of mutual benefit. The experiences of managers' application of CAA's access and engagement processes will be discussed, and their members' experiences of inclusion are reported in the subsequent section. A discussion of the themes arising by comparing intentions and realities follows.

Establishing a culture of inclusion

The interviews with staff describe their motivation to include their diverse publics, and the processes they applied to engage them. Themes that established a culture of

inclusion included: shared values; staff with expertise and a passion for advocacy; a commitment to evidence-based solutions and training staff.

CAA is a member-based organisation with a mandate to achieve "outcomes" to improve telecommunications for all consumers not only their members and this focus sets them apart from organisations who want "to be known" and promote themselves (Margo, 2017). CAA "strive to be open and transparent" according to Margo because "we value input" even though "the intent [of communication] is always strategic to maximise impact" (Margo, 2017). CAA have a mandate to "include customers for whom the market is not working" to extend access beyond "special interest groups" to wider society (Margo, 2017). CAA's commitment to inclusion extends beyond their members for a bigger focus on broader societal inclusion. The communication approach differs from other organisations who primarily aim to ensure their own survival with secondary goals to align with organisational values. CAA treat goals and values equally and it is a strength because the focus allows them to employ strategies that achieve more than their organisational goals to contribute to the greater good of society through inclusive values.

One way CAA maintain their commitment to their values is by employing staff who share values. Margo said while they have few staff, they have "solid expertise" and "an extensive alumni they can draw on" (Margo, 2017). Staff are "encouraged to be active in the community" (Margo, 2017) and many bring that passion for advocacy to their role and it improves CAA's ability to include. Internships and scholarships enable CAA to extend their capacity to engage and the relationships built create an interest in advocacy work according to Fiona (2017). Noah saw his job as being to translate what was often "complex policy into information people could understand" and he argued "people looked to CAA to be the consumer voice" (2018).

A staff member who is vision impaired provides a depth of experience to his role in disability policy that is unequalled in many similar organisations. Margo described his contribution as "tremendous" because of his commitment to access and being "plugged into the whole disability sector" where he can provide advice on effective

engagement strategies for the 20% of members who identify with disability (2017). His depth of knowledge extends inclusion and created a particular expertise that was highly regarded by staff and customers alike (Margo, Fiona, Branden, James, Bruno, Will, 2017). Similarly, experts like Fiona with extensive contacts in government and the communications regulations sector, and Branden in the digital and web communication field "are highly regarded experts with a reputation for establishing processes" to include (Margo, 2017). CAA is "a disability friendly workplace, where the lift talks to you", a ramp provides an alternative to stairs and a hearing loop is in place for hearing impaired people (Margo, 2017). Consulting with publics prior to engaging helped CAA create an inclusive environment because they "asked attendees what they need to be included" and provided it (Gavin, 2017). Gavin said the process aimed to avoid "stigmatising" consumers and excluding them because "the last thing we need is to get people here and not provide access" (Gavin, 2017).

A commitment to staff training to improve their capacity to engage increased their confidence liaising with people they may be unfamiliar with and identified ways to develop materials more inclusively. For example, a course in "easy English" enabled Noah to learn how to write information so it was easy to understand by a person with a lower reading age (Noah, Margo, 2017). Similarly, a "cultural awareness course to assist staff to engage with Indigenous communities improved their capacity to engage" and the skills learnt helped staff more effectively apply the Disability Action Plan and Reconciliation Action Plan in their communication (Margo, Gavin, Branden 2017).

A communication process which enables diverse publics' views to be heard creates a culture that is open to listening. By sharing ideas publics can identify solutions that suit themselves and develop processes to address their own barriers if they are supported and empowered to initiate them because their ideas are valued.

Avoiding hearing only from the most engaged consumers by "casting the net widely" enabled CAA to tap into "the needs of people for whom the market is not working" (Margo, 2017). The focus aimed to address criticism from government that CAA "spend too much time representing special interest groups and not the general consumer"

(Margo, 2017). This adjustment to engagement demonstrates the value of focussing attention on the barrier by collating evidence, rather than focusing on the public, resulting in a more equitable outcome (Gavin, 2017).

Gathering evidence to justify action was important because "without evidence" Gavin said, "we cannot show the impact" to make a case for support (Gavin, 2017). However, collecting evidence could be challenging as CAA have few resources and rely on their members to share information. Their capacity was further impacted by a "change to government funding redirecting it to larger advocacy groups" and in doing so making it "twice as hard to identify gaps in access" (Gavin, 2017). This was partly because the larger groups did not have the detailed knowledge about these people's access issues or evidence that smaller groups of people with lived experience had (Gavin, 2017). For example, a recommendation to improve engagement using text messaging was assumed effective for members of the Auslan community but was later found to be problematic because some consumers "had low literacy" (Gavin, 2017). The peak body was unaware the process was inaccessible for some members and they did not have this evidence to justify a variation of support (Gavin, 2017). Establishing a process that is inclusive is only achieved by empowering consumers who are affected to express their access issues by providing evidence so CAA can advocate on their behalf by "showing the impact" to call for change (Gavin, 2017). Noah collects his own data by individually contacting members when preparing a submission and including their specific views (2017). By gathering "input" from members, industry and government, CAA can advocate for policy that delivers better outcomes for their members and greater society because "we have the expertise to look at it from the consumer perspective" (Gavin, 2017).

A culture of inclusion was achieved because CAA equally valued their vision and mission and their goals and objectives and advocated for better outcomes for their members and the broader community. However, a culture of inclusion cannot achieve engagement alone, it requires a strategic approach to guide communication with publics because many may be harder to access for engagement to occur.

A strategic approach to engagement

A strategic communication process was essential for CAA to include their diverse consumers because they were "operating on the smell of an oily rag" (Margo, 2017). CAA needed to "maximise their resources" and connections were strategically made by collaborating with industry, government and consumer partners (Fiona, 2017). A formal engagement framework connected CAA to government and industry groups (Margo, 2017). Representation by CAA staff on external committees; establishment of advisory forums for specific and general consultation; and provision of speakers at events and conferences enabled staff to hear about current issues and "extended their reach cost effectively" (Fiona, 2017). Formal communication processes were extended by informal opportunities where feedback is exchanged as part of collaborations with industry and the community via the grants program and events, broadening understanding of the consumer and telecommunication regulation landscape (Margo, 2017).

By collaborating, staff awareness is increased and they can "raise issues with their members and gather their feedback to share it" (Fiona, 2017). Gavin said it "helps us set policy priorities" (Gavin, 2017). When knowledge is shared staff learn about issues and communication needs, improving staff's capacity to engage (Branden, 2017). For example, Margo, learnt how to create accessibility and how to identify barriers by "asking advisory forum members what they need to be included" (2017). The Indigenous advisory group described difficulties accessing information because it was only available in English "which is often their third or fourth language" for a person living in a remote community like Alice Springs (Noah, 2017). Noah said it was difficult finding translators but knowing you need to find translators is something learnt by engaging with the group (Noah, 2017). By sharing information, members learnt what was needed to engage and it was an asset because "long term relationships" were built and CAA's engagement model became known as an exemplar (Branden, 2017 and CAA Review, 2016, p.13).

Four advisory forums representing: Members, Disability, Indigenous and Small Business, that government identified as having "the greatest need for access" met annually face to face to provide feedback on policy and raise issues from their members (Margo, 2017). They provide a "coordinated consumer voice" with representation from people with disability, people on low incomes, Indigenous communities, culturally and linguistically diverse people, people from regional, rural and remote areas, people representing emerging technologies, women, youth, seniors and general consumers (CAA Advisory Forum, terms of reference, 2016, CAA Review p. 89). The forums gather "specific and broad feedback" from people with lived experience and give CAA a way to circulate information "directly to their community" (Gavin, 2017). Fiona "identified issues that were coming up" and circulated them to advisory forums and representative groups before they meet so they could think about the issues and to "give their perspective" to feedback into policy work (Fiona, 2017). For example, a research report that identified barriers to digital government, where all services are accessible online, was prepared and found "people who did not speak English were unable to make a complaint" when their service failed and their service provider was unaware of the problem (Fiona, 2017). The reason was NESB people did not know how to access their service digitally (Fiona, 2017, CAA Digital Government Report, 2017). Feedback identified a need for information in easy to access forms including "plain English versions of information and visuals." (Noah, 2017). "Audio files" were also found to create easier access for people with "lower literacy or other languages to understand content rather than written English" (Noah, 2017).

Advisory forum members provided feedback based on their capacity to liaise with their community and gather their feedback. They are not "vulnerable consumers or non-English speakers" themselves because "they understand consumer rights" (Noah, 2017). Some had lived experience but were not unable to access a process to engage, unlike some of the members they represented. CAA "rely on [forum members] to understand these consumers' needs" and their role, according to Noah, is to "convey their issues for us to address" (2017).

CAA's policy team contributes to submissions to government inquiries and parliamentary committees to "identify issues that are going to be relevant to a particular community, and approach our members for feedback" (Fiona, 2017). Policy that was particularly important for refugees and people in remote areas "to apply for a prepaid telephone" was identified as problematic (Fiona, 2017). These customers needed a phone to get a job but they were unable to buy one because they did not have "identity documents like a passport, birth certificate or drivers' licence" (Fiona, 2017). The alternative of finding and completing "a statutory declaration" to verify their identity details was "particularly difficult for Indigenous and refugee communities, people who don't always know their date of birth or have an address" (Noah, 2017). These experiences were identified by asking members of the advisory forums about their community's experiences and collating their feedback into submissions for government.

A grant program to encourage consumers to identify issues and apply for funding to address their own exclusion improved outcomes for successful recipients and created a skills exchange for staff. An organisation supporting people with visual impairment applied for a grant by providing evidence of written materials that were inaccessible for their members (Branden, 2017). The grant enabled these customers to use their lived experience to identify the gap and they worked with experts to develop "a plug in for Microsoft Office that checked documents for accessibility and advised how they could be improved" (Branden, 2017). A similar grant was awarded "to develop guidelines for organisations using Auslan translations" (Branden, 2017). Grants empower communities to develop solutions and apply them to suit their own needs rather than fit a process offered by the organisation as a North Queensland remote Aboriginal community found. They developed information to warn their community about phone scams in their local language using their own messaging to address it (Noah, 2017). Branden described going to the National Indigenous Media Festival shortly after where everyone was talking about the benefit of having the resources (2017). Other Indigenous groups were inspired to apply for a grant to "develop resources including posters and brochures in their own language" (Branden, 2017). A benefit of the community devising the solution is they design it in the format they

need and circulate the information to their members using their own networks, increasing awareness in ways that another communicator may not (Branden, 2017).

Advocacy organisations also applied for grants to help them design effective ways to engage their communities. Margo described a grant awarded to a community legal organisation who developed a one-day event where community members bring their utility bills and staff reviewed them to identify payment issues (2017). They worked with telecommunication, energy and water ombudsman and counsellors to help resolve misunderstandings and disputes. The model of "a bills day" came out of the grants program and is now used to assist many vulnerable communities that Fiona found "get forgotten too often" (2017). Similarly, a grant to address issues that arise when carers and family members "go online on behalf of others" as proxies because the person cannot explain their situation due to language or ability was identified by ethnic advocacy groups (Fiona, 2017). The project has resulted in development of "a check list of things to be aware of" as a positive outcome (Fiona, 2017).

Relationships were built through strategic engagement at conferences and events and the exchange often led to productive collaborations. The Annual Conference was an event where the latest trends and innovations are presented by government and industry partners, and advocacy groups showcase their application to demonstrate improvements in the telecommunications sector. The event is highly regarded as the place to launch new policy and to hear about new practices from a wide variety of organisations and for organisations to raise issues in an environment that is inclusive with hearing loops, Auslan translators, audio captioning and so on (Gavin, 2017). CAA staff also attend conferences and events to strategically promote their latest information directly to managers who will use it and to tap into community sentiment as an effective feedback process.

CAA's website is "AAA rated" and "an exemplar for accessibility" (Branden, 2017) and they use the Radio for Print Handicapped (RPH) to extend reach (Margo, 2017). "The internet and telephony" are their main tools for sharing information and CAA work with peak bodies "to further disseminate information to meet their specialist access

needs" (Gavin, 2017). CAA is a generalist organisation, and they have a big focus on access for consumers for whom the market is not working and many are people with disability, who represent 30% of their membership (Gavin, 2017). Much of CAA's work involves "translating complex legislation, policies and government reports into an accessible form" and "people look to us" to do it well according to Branden (2017). He described "going back and forth between the policy team and consumers" to understand the points being made and to get the language right before preparing effective information for their consumers (Branden, 2017). By undertaking an "easy English" course, he and the communications team aim to ensure all information follows that model so it is more accessible (Branden, 2017). However, challenges "to keep [communication] short and spelling everything out sits contra with usual practice" (Branden, 2017). James found "wording could be tricky," with portals on the website for people with disability self-evident but terms like "hardship" could make it difficult for people to know whether the portal was to help them (2017). By tracking views James found few people access the portal and he claimed it was because "people who can't pay their bills did not consider themselves as facing hardship" (2017). "We put out a flyer that was described as a resource for people facing tough times" and it was much more successful (James, 2017). Similarly, "a series of information brochures with a snappy name designed to catch people's attention was debated by the team" and "we decided to call them Tip sheets" for phones and internet (Branden, 2017). They are one of the most popular information packs. "Making it clear and simple" worked (Branden, 2017).

Presentation of Information in hard copy materials and on the website is carefully laid out to be accessible by using icons and pictures for people and accessibility software (Branden, 2017). Information is published in English and other languages and formats (Margo, 2017) but CAA rely on peak body members to circulate information to their members using their own channels to maximise reach. The information is designed to be accessible but it only includes when it is becomes available by using a known process.

Managers operated within a culture that valued inclusion and it informed the way they advocated for their members and the broader community. CAA strategically used their staff to engage their members as managers of advocacy groups to maximise reach and gather feedback as evidence directly from people with lived experience to develop information they were able to engage with. Collaboration with experts in industry and advocacy groups improved CAA's capacity to engage because they shared networks and engagement processes based on feedback from their members. This process enabled CAA to influence policy submissions and "advocate for consumers" in ways that engaged them (CAA, Annual Report, 2017).

The next section reports on the engagement experiences of interviewees who represented an advocacy organisation that is a member of CAA.

Members and their experiences of inclusion

Six people were interviewed because they worked for organisations that were members of CAA. Three people represented organisations that advocated for people with disability and three people represented organisations that advocated for people from a Non-English-Speaking Background (NESB). They were selected because they were managers of one of the advocacy groups and because of their level of engagement. Two were selected because they were actively engaged, two were aware of the organisation and engaged regularly and two only engaged when approached or as needed and they were known to be latent. This focus on the engagement process mimics the aim of this research to identify diverse minorities' experience of inclusion by following Miles, Huberman and Saldana's data collection method to listen to people at the centre to compare with the experience of people on the periphery (2014, p.37).

All interviewees were actively engaged with their advocacy group and held expertise about effective communication processes and challenges for their members. People with disability's engagement as a member improved their capacity to have their issues heard to inform practice. However, advocating for people with disability was criticised as not keeping the focus broader for "all customers for whom the market was not working" and so CAA staff made an extra effort to ensure all communication was

inclusive (CAA, Annual Report, 2017, CAA Review, 2016). The change of focus further enhanced their reputation for being inclusive.

Bruno, Will and Nicole identified with disability. Each is a member of multiple advocacy groups and liaised with CAA directly as part of their group. Bruno is an active member of a peak body for vision impaired people and he said they "chose to become a member of CAA, rather than work as allies on common issues" because the collaboration improved their advocacy capacity (Bruno, 2017). Bruno looked to CAA for "leadership around telecommunication issues and to identify opportunities to give feedback" (2017). The exception was a long-term campaign his organisation had initiated "advocating for audio description" on television (Bruno,2017). By partnering with CAA as a member, the peak body was able to tap into existing relationships with government agencies and industry because they "have an established and credible reputation working with them" (Bruno, 2017). Bruno liaised directly with Gavin or the CEO because they had a relationship, or as part of the member and disability advisory forum and by invitation at teleconference meetings (Bruno, 2017). Bruno had extensive experience in advocacy work from a human rights perspective and he said he identified with vision impairment (Bruno, 2017).

Will is a member of a peak body for accessible advocacy in Australia and he has been "involved with CAA for over six years now" (Will, 2017). His organisation is small and they rely on CAA to connect them to industry and compliance bodies to keep up to date with telecommunications as it has become "a huge part of the lives of most deaf-blind people" (Will, 2017). SMART phones have given people access to a "level of independence through text messaging, emails and social media" but in doing so, they have become "customers of telecommunication providers" (Will, 2017). His members found the customer service process is not accessible for them and advocacy to fix "issues around bill shock and financial management" is difficult to address (Will, 2017). Working with CAA to raise these issues and including their feedback on policy is mutually beneficial (Will, 2017). Will's level of engagement with CAA is regarded as aware of engagement processes but he is not actively involved as part of a consultative forum. He has lived experience of disability and he is a strong advocate.

Nicole is a member of an advocacy organisation for people with disability and has "sat on CAA's disability advisory committee" (2018). She has attended their annual conference and she describes their inclusive processes as "exceptional" (Nicole, 2018). Nicole argues success is due to having a broader focus on "telecommunications and disability" by "try[ing] to mainstream disability" (Nicole, 2018). She described CAA's approach to advocacy as "very effective" because "they always involve us in developing their strategic planning" (2018). Nicole found CAA put "a lot of energy" into ensuring policies and processes are accessible and she attributed much of that focus to "employing people with disability to run things" (Nicole, 2018). Nicole works to advocate for people with disability in the workplace and to ensure they have access to everyday processes but her current engagement with CAA was latent as she no longer has a formal role but engaged as needed (Nicole, 2018).

All three managers of organisations that are members of CAA identified with disability and they knew their right to advocate for equitable service. Members agreed they had good access to information but at times they could miss giving feedback unless they were actively part of a formal consultation. Will and Bruno saw this as a missed opportunity for CAA to tap into their members' expertise and use it to improve their advocacy work (2017).

CAA members Lia, Michaela and Garrick represented people from an NESB. All of these members worked collaboratively with CAA to improve telecommunication access and they requested services as required. Lia is a manager of a national peak body that advocates for people "who are members of grassroots ethnic and multicultural community organisations" (2017). She "assists CAA to make their strategies more inclusive" by providing advice "on language proficiencies" and cultural variations (Lia, 2017). Lia is actively involved with "lobbying and advocacy work about issues of immigration, citizenship, racism, anti-discrimination, but also in specific areas such as disability and healthcare" (Lia, 2017). A particular and growing focus is "lobbying to improve services for elderly Australians from culturally and linguistically diverse backgrounds", with some but not all having "a language other than English preference" (Lia, 2017). Their strategic focus reflects part funding by the Department of Social

Services "to conduct research and write an annual report on access and equity of multicultural communities" (Lia, 2017). This advice is provided to government to improve "equitable outcomes and equitable access to outcomes" according to Lia, although she found the advice in the report "quite basic" and argued it "shouldn't need to be given" (Lia, 2017). Lia was an actively engaged member of her organisation and CAA regarded her to be actively engaged but she described her relationship with CAA as more to help them to connect with their diverse publics than them helping her members.

Michaela is a member of a state-based legal advocacy organisation of twenty full time staff plus volunteers who have been members of CAA for more than six years. They advocate for vulnerable and disadvantaged people of whom "many are from a CALD background with many co-occurring or having individual disability" (Michaela, 2017). Michaela's involvement with CAA is 'as needed' and the relationship was originally motivated by winning a grant to address legal issues and support customers access the technology they need to function fully in their environment. Michaela found "a lot of people don't know they've got a legal issue" that could easily be resolved by contacting the TIO or ombudsman so "we facilitate that" interaction because they need that help to engage even though it does "bog us down" (2017). Her relationship is regarded as aware and active when required.

For Garrick, a manager of a state-based organisation supporting asylum seekers, the relationship is defined as latent because engagement was occasional. Garrick hosted training of newly arrived refugees and asked CAA staff to attend to explain how telecommunication plans work and point out loopholes. Garrick said many clients "stayed after to ask individual questions" so it was "very helpful" having CAA present (2017). He said the one-on-one contact was particularly beneficial because there is "little time to spend" on individuals (Garrick, 2017). Garrick described his contact with CAA as minimal. However, he does receive "the newsletter and has been approached to provide people for case study research" for evidence of gaps in service and to "speak about his work at their Annual Conference" (Garrick, 2017). Garrick found the

contact effective because they could share information about their work, and he knew he could approach CAA if needed (2017).

All three interviewees had good access to CAA and collaborated when they identified it was appropriate and the exchange extended their advocacy potential. Conversely, CAA approached them to seek their feedback and to ask for specific advice to improve communication with their members. Often there was no reason to connect and because of that, interviewees forgot to seek out or perhaps were unaware of new opportunities to participate. Michaela said she could find "emails and webnews" if she needed them but her "inbox was pretty full" and she was "time poor" (Michaela, 2017).

The next section describes these members' opportunity to have access and engage.

Members and their experience of access and engagement

Two distinct perspectives on access and engagement were identified after analysis of interview data from CAA members. Firstly, the interviewees were managers of advocacy organisations who were members of CAA and they describe their engagement opportunities and their challenges accessing information from CAA. Secondly, managers described their experience advocating for their members by outlining their approach to gather feedback on access and to raise issues of inclusion as evidence of effective policy or to argue for change in wider society.

A key aspect from the findings of interviews with members is their praise of CAA for its "leadership" in providing advocacy for telecommunication consumers (Bruno, 2017). Nicole said they got a "a big gold star" and Will said, "you couldn't find a better organisation to consult with" (2017). These comments came from managers of advocacy groups for people with disability and managers who identified as having disability. They had a professional and a personal commitment to include that manifest in their actions. Whereas managers of NESB advocacy groups had a professional commitment driven by their organisation's communication structure, they did not identify as from an NESB themselves. The managers' focus was achieving outcomes for

their members by sharing information and using it to contribute to policy reviews, grant outcomes, at skills training and through conference presentations. The exception was Lia who was focussed on ensuring equity to service for her members in society. Lia described "assisting CAA to be more inclusive culturally and by language" whereas Michaela took a "case study" approach to "address multiple legal issues" of individuals at a Bills day and Garrick invited CAA managers to training workshops for refugees in transition to housing and employment (2017). The managers with lived experience appeared to provide advocacy based on values they held personally and professionally because of a better understanding of the barriers faced. Other managers did not have that depth of personal insight so the focus was professional. Regardless, both advocated to achieve the best outcome for their members.

Key themes in the relationship between CAA and their members include: advocating for inclusion, leading with lived experience and mainstreaming diversity.

Member organisations' experiences engaging with CAA

The member organisations' experience of engaging with CAA was mostly described as positive. Bruno said CAA have "a culture that values inclusion" because they are "philosophically committed to access" that is "driven from the top and permeates through the organisation" (Bruno, 2017). Will found mutual opportunities for involvement in "research and policy development" improved their capacity to service their members (2017). The relationship enabled member organisations to keep "abreast of communication issues" and "draw our attention to things that will impact our members" (Bruno, 2017).

Active member organisations appreciated being "a member of CAA because they were formally included in consultations, and it gave them a pathway to convey their members' issues (Bruno, 2017). Bruno looked to CAA to "provide leadership" and "identify telecommunications issues" to take to their members for their input (2017). They also ran their own campaign for "audio description" to provide verbal commentary on television for blind or low vision people that was supported by CAA

(Bruno, 2017). CAA's credibility and connections with government and industry improved the organisation's capacity to advocate for their members (Bruno, 2017).

Relationships between member organisations and CAA were improved when they were part of an advisory forum or presented at the conference or because they won a grant because they could engage in dialogue. Many members with disability also had a relationship with Gavin, the Disability Policy Officer where he "will just ring me up or I'll ring him" if a pressing issue arises (Bruno, 2017). Likewise, Nicole, as a previous member of an advisory forum, was able to ring Gavin, as was Will, who had participated in consultations (2017).

The relationship between managers of NESB organisations and CAA was different even though all members interviewed had been part of a grant, research or presentation at the conference, their engagement was not continuous, and they did not have a specific person to liaise with, nor did they look to be more involved. Lia described her relationship as providing advice to CAA to "ensure inclusivity of a wide variety of communities and language proficiencies" to provide evidence to support lobbying and advocacy work (2017). Michaela used a focus on utility bills to start a conversation with vulnerable and disadvantaged clients from "CALD backgrounds…and with disability", to hear "their stories" and address multiple legal issues (Michaela, 2017). The process provided "smarter ways to engage" and the stories provided evidence to inform "systemic advocacy and campaign for legislative change" (Michaela, 2017). NESB member partners were not as active with CAA as disability organisation members even though Garrick said they "could engage more if we wanted to" (Garrick, 2017). It was more about "relevancy and having the time" to get involved (Garrick, 2017). Lia and Michaela agreed (2017). The relationship between disability advocacy organisations and CAA was formally embedded in their strategic plan guided by their application of the Disability Action Plan's goals. A similar measure was not in place for NESB advocacy organisations.

Opportunities to give feedback as part of CAA consultations "was not an issue" because the papers were "circulated in an accessible format" prior to meetings "to

allow members time to gather feedback" (Bruno, 207). However, "having the time to read [papers] and provide feedback" in the way CAA committee members needed could be challenging, according to Bruno, depending on his workload (2017). Bruno preferred to "engage via teleconference" to give verbal input because he could "engage with others … as a collective through the process" (Bruno, 2017). Similarly, Nicole said, "having the information made available in advance is really important" (2018). She was provided with an agenda and papers in plenty of time and asked, "what focus" she wanted or was told, "we're thinking about looking at this area" and the prompts helped her prepare for the meeting (2018).

Will, however, argued CAA "swings to appease industry" even though he goes to conferences and is asked what he "is doing?", he finds his work is not always reflected in the feedback (2017). Will described attending a consultation only because he rang up about another matter and it prompted the manager to invite him as a second thought. It was easy for Will "to speak with Gavin but it was not so easy for him to know about a consultation" because he was not part of an advisory program or receiving regular updates (2017). This "reactionary approach to engagement" disappointed Will, only too aware his "little corner of interest is one part of their very broad portfolio". He knew "we came very, very close to not being included" in important conversations (Will, 2017). Nicole also found she could be left out because "it was not always easy to know what [CAA] are doing in between meetings" (2018) echoing Will's point that "we don't know where, when and how the opportunities for us to participate come up unless we look for them and instigate them" (2017). Will "learnt to be proactive" (2017). However, he described his organisation's engagement as "a member that draws on CAA when we need assistance" (2017). They were not proactively drawn into CAA's work in a way he thought "could be quite effective" to extend their remit (Will, 2017). Some managers wanted more regular communication "about their activities" to be sure they were kept up to date (Bruno, Will, Nicole 2017, 18).

Nicole on the other hand found CAA to be "very professional in the way they ensure access" by providing "interpreters, alternative formats and communicating when

needed but not too much" (2017). She found the fact they "offer to support your access needs" significant because it shows they value your input (Nicole, 2018). Nicole argued CAA "mainstream disability" by involving us in "developing their strategic plan" and that is where their focus on "advocacy emerges" and becomes embedded (2018).

Customers' experiences engaging with CAA member organisations

CAA member organisations provided feedback from their customers about their current telecommunication opportunities to argue for change. Bruno described frustration when "unreasonable requirements" like asking people with sight impairment to provide "a drivers licence" or equivalent were imposed when it was waivered for sight impaired people (Bruno, 2017). Their feedback was included in consultations as part of the disability advisory group and other relevant forums to address.

Similarly, a shift to "a SMART phone" technology gave Will's members "a level of independence" that improved their capacity to engage but they found their telecommunication providers were unable to provide the customer service they needed because it was not accessible for them (Will, 2017). Will explained deaf-blind customers were "blocked from accessing customer service interfaces over the phone, because they had to go through an Auslan interpreter" and verification via an interpreter prevented inclusion (2017). He explained how a customer had received a bill and found an extra charge had been applied and wanted to come in and talk to someone about it as their "best method of communication for Australian sign language users who have visual and auditory impairment" but it was not an option. The only option was "to have a conversation with someone through a computer interface using the National Relay Service (NRS)" to translate, but it was inaccessible (Will, 2017). The service goes through a qualified interpreter" but … "when the phone gets picked up, the person starts signing, "hello my name is Joe Blow and I'm speaking to you through an interpreter", the operator then "refuses to speak to us because they don't believe they can verify they are actually speaking to the account holder so the conversation gets shut down" (Will, 2017).

The nub of Will's customer's complaint is "you sign someone up and you're taking their money and part of what they are paying for is an ability to access customer service" (2017). They "don't get a discounted rate because half the services are inaccessible" (Will, 2017). The telecommunication provider needs to "step up and make some very minor modifications" according to Will, who is in consultation with Standards Australia (2017). He acknowledges the issue is "niche … and exclusion may not affect a lot of people" but Will argues it is not restricted to this community (2017). Many "older people or people from NESB or people with intellectual disability would like to have someone assist them when they needed to interact"(Will, 2017).

A similar experience of exclusion was described by Lia analysing the government's "move to digital communication that was difficult for members of her organisation because they have differing levels of literacy" (2017). She found organisations "offer variations but there is an assumption people can read English to find them" (Lia, 2017). Lia emphasised "the need to have multiple communication channels and communication methods" because "it's not enough to only provide translated pages." She advocated for the content to also "be provided in simplified or accessible English versions" and to be "downloadable, so people can take it away and read it and think about it" (Lia, 2017). Lia described the "Australian parliamentary website as "horrendous in terms of access for multicultural communities, with no translated material, no ability to receive support in language, and it is text dense" (Lia, 2014). These points impact access and "are fundamental to [achieving] democracy and [meeting criteria of the] legal system given huge swathes of the population don't have equitable access" (Lia, 2017). These points provide important feedback for CAA to incorporate in their advocacy work (Lia, 2017).

CAA supported member organisations to introduce changes to improve inclusion through their grants program. Michaela's use of a casework approach to "bring parties together to identify and resolve financial and legal issues [for vulnerable community members] by looking at their bills" was an effective model achieved because a grant was awarded by CAA (2017). Michaela found having a conversation around a bill was effective because many people had no idea they had a legal problem and their team

assisted them to resolve issues or refer them onto the ombudsman's office (2017). Part of the success was "employing community workers from the same background as their customers" to assist them with access and building trust with people so they accessed our services" (Michaela, 2017). CAA promoted the approach and outcomes in their webnews and at the conference, and the model was used by other similar organisations to engage harder to reach communities (Fiona, 2017). The evidence gathered from the cases improved the outcomes of their advocacy work.

The strength of the relationship between members and CAA is emphasised through recommendations for changes and improvements in services proposed by members, even those who are latent in their relationship with CAA. Bruno suggested "quarterly updates summarising key issues" and podcasts to forecast issues or government reviews/reports "before things happen" will help us to "start thinking about issues earlier" (Bruno 2017). Will acknowledged the expertise and experience of member organisations was a strength and it created evidence-based policy and action but he suggested that this knowledge may not be "accessed effectively by [CAA] at this point in time" Will (2017).

Discussion

CAA engaged with government, industry and their members to strategically improve access to telecommunication service for all consumers, particularly those at risk of being excluded. Engagement was successful according to members and managers because they were strong advocates, but communication about upcoming issues could be limited to customers already engaged. Constraints caused by having few staff were blamed but members identified gaps and argued small improvements to processes were achievable. Three themes emerge from the Findings which are significant and relevant to the research question and are explored and situated with relevant literature. They are advocacy for inclusion, leading with lived experience and mainstreaming diversity.

CAA advocates for its members by ensuring their telecommunication issues are included in policy submissions to government and consultations with industry bodies. This case study identified CAA's evidence-based advocacy for changes in telecommunications products and services as a strength. The combination of established relationships with a strategic approach to communication through formal and informal processes delivers evidence-based policy that Nichols, Malenfant, Schwan, argue create change (2020, p.653). The managers are highly regarded experts "connected with government and industry" and the relationships enable them to "take a leadership role" to advocate for inclusion (Bruno, 2017). CAA's focus on "customers for whom the market is not working" deliberately aims to meet a wider societal goal for "their consumers' voice to be heard in significant debates" (CAA, Annual Report, 2017, p.4). This worldview reflects a human right "to inherently value each person regardless of their background, where they live, what they look like, what we think or what we believe" (Australian Human Rights Commission, 2022). It is a value that is important to CAA. Unsurprisingly many of their members represent people from vulnerable and disadvantaged communities. Membership facilitates relationships that give organisations a "smart" way to share evidence about exclusion to improve their chance of being heard (Michaela,2017), and it gives CAA a strategic way to engage their harder-to-reach publics. Strategic communication for knowledge exchange plays integral roles to create evidence-based policy change according to Nichols, Malenfant and Schwan, (2020, p.653). They found "relationships, trust and timing influence government interactions with research" and are shaped by the availability of evidence and the degree to which it can be selectively and strategically used (Schearer et al., 2018 in Nichols et al., 2020 p.653). A "heterogeneous network structure with formal and informal alliances …serve policy change aims" according to Nichols et.al, because they cast the net widely (2020, p.653). "Evidence-led governance" shifts the boundaries between "research, advocacy and government action, to research and strategic communication" and extends reach to organisations that have traditionally been prevented from working together (Nichols et al., 2020, p.653). These structural

opportunities rely on managers having a relationship and working strategically to maximise the voice of consumers.

Relationships

CAA place a great deal of importance on relationships to achieve advocacy work witnessed by regular communication with members, advisory groups, industry bodies, government, and the broader community to ensure "the consumer's voice is heard" (CAA Annual Report, 2017, p.4). Their formal communication structure permits participants to exchange ideas that are listened to because their feedback is valued as it provides evidence that informs their advocacy work (Lee, Li and Tsai, 2021, p.54). Bruno found the relationship allowed member organisations to keep "abreast of communication issues" and "draw attention to things that will impact our members" (2017). This approach differs from informal communication where the lack of structure impacts minorities because their engagement style can differ and they find it harder to be heard or to have their feedback recognised (Ahmed, 2012). As Will experienced, as a member not associated with a formal consultation process as part of an advisory group, he "nearly missed giving feedback" because he was unaware of a call out (2017). The significance of not having a relationship is that opportunities are missed because they are covert when norms of engagement are not shared (Hyland-wood et al. 2020, p.6). A consequence of not sharing norms is that people become marginalised (Guttman and Salmon, 2004, Lupton, 2015). Will "learnt to be proactive" to improve his chance of being included but it was hard for him because he was not privy to upcoming consultations as he was not part of a formal process (2017). Greater focus on informal relationships to identify communication pathways that extend reach is argued by Habersaat et al. as leading to modifications that improve engagement (2020 in Hyland-wood, et al. 2020 p.6).

NESB members who were part of an advisory forum, where they could raise concerns found having "a voice that counts is more than just a process for speaking, it is a form of agency" (Couldry, 2010, p.8). They were given the agency needed to raise their members' concerns because ideas could be discussed (Virdun et al, 2013, p.101). The

exception was Lia because she advocated on behalf of her members "to achieve equal access to services" by providing variations "by language and culture using their own media" to make connections (Lia, 2017). Rather than empowering members to discuss issues they were able to raise their own issues. A system for diverse publics' voice to be heard is essential because it may not be recognised when it differs from the dominant culture (Fraser, 2008). Lia's organisation empowered its members to share experiences so they could advocate on their behalf as experts (Lia, 2017). Members of organisations representing people with disability had a formal engagement structure as part of the Disability Action Plan to report against or they "rang Gavin" who had lived experience to request support (Bruno, 2017). Members not connected with a formal process like Will could struggle to engage; even though he had the capacity, he may not have "the agency" to raise his members' concerns unless CAA provided a pathway (Will, 2017). Relationships improved the organisation's capacity to establish a communication process where multiple views are valued and as a result can be heard and shared (Dawson, 2018, p.784) but they were not always present.

Managers were known as "experts" who regularly participated in training about "the latest access" innovations and Margo argued the skills set them apart (Margo, 2017). Relationships form because participants learn about one another and over time they share values when a system is in place to encourage the exchange (Everett, 2018, p.91). But there was a gap. Managers were sensitive to their members' access needs, but they were also blinkered by their own worldview of inclusion and it affected their ability to look more broadly at CAA's engagement processes, as Ahmed proposed (2012, p.17). Branden described being "married to some of those consumer organisations for so long", they "really understand what their constituents actually need" but Will said they missed including his members (2017) and CAA were unaware.

Formal communication processes allowed for productive relationships but they masked exclusion of members who were not part of an advisory forum or committee where they could engage in an exchange of ideas, where multiple views are valued and as a result are heard (Dawson, 2018, p.784). Successful dispersion of information relies on the organisation creating connections between staff and individual minority publics

(Virdun et. al., 2013, p.101). Dreher calls for institutions to develop a process to hear their minorities rather than relying on them to find a way to be heard (2009). The organisation's capacity to listen to their members that are outside their usual engagement process was limited and as Daya argues, a focus is needed to identify why (2014, p.302).

The formal communication process established relationships with actively engaged members and they were able to share their experiences and the evidence gathered helped CAA advocate for them. The relationships were extended by informal relationships through collaborations with member group participants who identified their own experience of exclusion and provided evidence to argue for change. In part success was achieved because the relationships were mutually rewarding (Bruning and Ledingham, 2000) and when culture was shared, they were more likely to trust one another and be open to engage (Johnson and Taylor, 2018, p.1; Kent and Taylor, 2002). The telephone card scam in a North Queensland Aboriginal community was an example of a successful collaboration where the community developed resources to alert their own community. Engaging directly with community assists managers because they share culture, have a relationship and know what they need to engage their members. James' described the direct engagement as successful because they were able to establish relationships with more vulnerable communities to hear first-hand about their issues and support the community to resolve their own issues in culturally appropriate ways. The importance of fostering formal relationships and creating opportunities for informal interactions becomes a "strategic exchange of knowledge" because trust can be built as the process is reciprocal (Nichols, Malenfant, Schwan, (2020, p.640).

Strategic communication process

CAA operated on "the smell of an oily rag" so it was imperative they communicate strategically to maximise their resources to achieve their inclusive vision (Margo, 2017). By establishing a purposive action framework CAA proactively engage their publics, including those identified by government that "the market was not working"

for (Habermas, 1984, Hallahan, et al, 2007, CAA Annual Report, 2017 p. 4). A formal communication process created "actual change" because pathways encouraged discussion and gathered feedback according to Fiona (2017). Engagement occurred as part of advisory forums, conferences, grant programs and representation on committees. The interactions created a space for CAA managers and their members to efficiently bring the real-life experience of their community to the discussion to raise issues. In effect the strategic communication process combined formal and informal engagement to maximise reach (Lee, Li, Tsai, 2021, p.55).

CAA's inclusive vision sets them apart from other organisations because it "extends beyond profit-making goals" (Williams, 2013) to mission statements that are designed in "the public interest" (CAA Annual Report, 2018, p.2). Strong core values to achieve advocacy underpin CAA's organisational goals and objectives and measure inclusion because they are strategically connected (Lecioni, 2002, p.6). Margo proudly acknowledged they operated to achieve "outcomes" for their members by allocating resources to maximise inclusion through advocacy (2017).

Nonetheless, CAA are not able to completely demonstrate successful engagement with publics that are not part of one of the organisation's specific foci, such as newly arrived migrants who are not part of a group because these organisations are unable to give feedback to CAA (Dawson, 2018, p.774). In providing that structure CAA are able to show "what counts" and through shared knowledge to reimagine "who counts" (Dawson, 2018, p.783) although feedback is limited to formal channels.

An assumption that Informal communication from member communities and individuals improved inclusion was found to be effective if CAA was able to adjust their processes as required (Hyland-Wood et al., 2021, p.7). Will said "you couldn't find a better organisation to consult with… but we came very, very close to not being included in conversations" because he was not part of a formal communication process such as an advisory group (2017). The strategic communication system was effective for CAA's advocacy purposes but it blinkered managers who assumed their communication processes effectively engaged (Ahmed, 2012).

CAA is recognised as a leader in its field because it comprises experts who draw on the lived experience of staff and members to inform their advocacy work (Nicole, 2018, Will, Lia, Bruno, 2017). A lived experience is important for engaging minorities because their communication style can differ and they may not share culture and do not share norms that enable understanding (Kim, 2001, p.143). The contrast of Nicole giving them a "gold star" because "they employ people with disability to run things" and "always involve us" (2018) with Lia who "advocates for diverse ethnic communities and translates" information for CAA (2017) showcased different ways lived experience contributed to inclusion. Nicole had been an actively engaged member and although her current engagement status was latent, she knew CAA actively worked to achieve a culture of inclusion because she was involved (2018). Lia, on the other hand, found the move to digital government difficult for her members "because literacy levels vary" and while translations were available she found "an assumption people can read English" to access it meant they were excluded (2017). When cultural norms are not shared and opportunities for collaboration are not provided to explore issues, misunderstanding and misinterpretations in organisational communication can occur that are hard to recognise and exclude (Vardeman-Winter, Jiang and Tindall, 2011).

All interviewees were part of CAA member organisations but only the managers of disability-focused organisations had lived experience of disability and their personal insight generated "a cohesive approach" to advocacy. This was not identified in the managers of NESB-focused member organisations (Vardeman-Winter, et al., 2011, p.227). Groupings of people with "cohesive behaviours" encourage members to "make sense of each other and operate meaningfully" in what Holliday describes as a "small culture" (1999, pp. 240-248). By operating within a small culture members avoid taking a generalist approach that is essentialist and prescriptive because norms are not shared (Holliday, 1999, p.240-241). Lia, Michelle and Garrick shared their members' experiences as users of telecommunication not as members with lived experience. The subtleties of the relationship affected engagement because they did not share values and could miss culturally specific information (Airhinhenbuwa, 2020, p.2). Managers of

advocacy groups for people with disability had a personal commitment to advocacy because of their lived experience, meaning they had a different relationship with the people they represented. They understood the implicit complexity that occurred as part of communication. When implicit norms of practice are shared, "mutually recognised validity claims" increase the possibility of inclusion (Habermas, 1984, p.209).

Staff were "highly regarded as experts" and many had "lived experience" that improved engagement (Margo, 2017). Gavin's position as a manager with lived experience of disability enabled him to gather "evidence" of exclusion to make a strong case for "more inclusive policies" (2017). His depth of knowledge and willingness to share information were appreciated by staff and members alike and provided easy access to what might be a difficult engagement for people who were unfamiliar with disability (Margo, Fiona, Branden, James, Bruno, Will, 2017, Nicole, 2018). People with lived experience of being a minority are a valuable resource in organisations according to Vardeman-Winter et al (2014), Davis (2013), Goggin (2009), Campbell (2010). Gavin found accessibility issues like those associated with Digital Government were the same for many minority groups, and he advocated for a "wholistic approach to inclusion" (2017). Dawson agreed; inclusion occurs when an environment is established where multiple views are valued and as a result people can be heard and information shared (Dawson 2018, p.784).

Managers unfamiliar with their diverse consumers can essentialise communication based on their previous experience and use stereotypes to make connections and be unaware they missed connecting (Holliday, 2010, p.258). Employing people with lived experience improved access by creating awareness that inadequate communication processes were operating. Noah's lived experience of Indigenous culture helped him identify barriers Indigenous consumers in metropolitan areas experienced because they were unable to understand information in English (2017). "English was their third or fourth language" and their service provider was unaware the information prepared for them was inaccessible (Noah, 2017). Campbell defines this biased worldview as "ableism... a set of beliefs and practices that privilege one view, the more powerful,

and mask other views" (2008, p.153, Thomas, 1999, p.24). By sharing norms of culture, managers can identify and address access issues and prevent becoming minoritized (Dawson, 2018, p.772). Airhinhenbuwa found working in partnership with the community was intrinsic to identifying culturally appropriate messaging and promoting it (2020, p.2).

Training

CAA demonstrated their commitment to inclusion by providing staff training to improve engagement with their wide and diverse range of publics. New staff are provided with guides on "how to use language sensitively" and set expectations of how to engage professionally (Margo 2017). The framework established expectations that Bruno argued created a culture that prioritises accessibility "that is driven from the top" and permeates the whole organisation (2017). Margo argued it is strengthened by having "an extensive alumni in a number of influential organisations that we can call on" (2017).

Margo proactively "looked year on year to decide where training" is needed based on feedback from government, industry and consumers (2017). They identified gaps in "cultural awareness of engagement practices with Indigenous communities" and Margo arranged for staff to "learn about culture and respect but also how to work with communities to identify different approaches to engagement" (Gavin, 2017). Training aimed to bridge the gap created because norms are implicit, not shared and taken for granted (Schein, 1985).

Training encouraged managers to question their own communication processes as emerging from an 'ableist' view that privileged the most powerful and masked the access needs of people who are different (Campbell, 2008, p.153). Norms of culture may not be shared and inviting people into spaces or practices that reflect dominant values of whiteness and class privilege without fundamentally reimagining the practice involved to engage them is insufficient (Dawson, 2018, p.784). For example, training workshops for people who advise the Afghan community about their consumer rights and publish the material in Dari language aimed to improve outcomes for that

community when materials were prepared and distributed with the community (Margot, 2017). The collaboration empowered minorities to express their own needs and for CAA to support them to achieve accessibility. Embedded power relations and social norms that occur in the exchange are complex and need exploring, given "consensus arises from the suppression" of those who lack prominence in the exchange (Lukes, 1978, p.19). Training staff to working with people with lived experience to learn how to engage and create an open exchange is essential. Training also gives staff confidence by reducing barriers and positively influences the culture of the organisation according to Lindsay et al (2018, p. 634).

Experts trained staff, and many were also members of CAA with lived experience and established relationships, so it was easy for them to convey the access needs of the people they represent within a telecommunication environment. Lia regularly provided advice on "language proficiencies and culturally appropriate engagement" for multicultural publics (2017). As did Bruno who provided information about Auslan to assist James develop variations of information to meet CAA's members' access needs (2017). Providing (dis)ability awareness training strengthened employees' ability to engage and create attitude change within the workforce (Buciuinene and Kazlauauskaite, 2010). Further, a consequence of hiring people with lived experience is that the workforce becomes diversified and leads to a more inclusive and positive workplace because people have a chance to understand one another according to Lindsay et al. (2018, p.650).

The dedication to training staff and engaging with diverse publics "is symbolic" of their commitment to inclusion according to Nicole (2018).

Mainstreaming diversity

Mainstreaming diversity improves access for consumers who share norms of culture when norms of practice are established to include them. However, when norms are not shared structural inequalities maintain or exacerbate social inequalities (Fraser, 2003) and the oppression is hard to pinpoint (Dawson, 2018, p.776).

CAA demonstrates its commitment to diversity by strategically engaging with consumers for whom the market is not working through forums, conferences, collaborations, and grants to gather their feedback and use it as evidence to improve policy and processes (CAA Annual Report, 2017 p.2). Ensuring their "voice is heard in significant debates" is essential for mainstreaming diverse consumers in submissions, representations and by sitting on external committees (CAA Annual Report, 2017 p.4).

CAA established communication processes for all consumers to engage, including their diverse consumers, and by participating they shared experiences and problem-solved: the process addresses exclusion according to Lee, Li and Tsai, (2021, p.54). Participants were able to hear and listen to one another as part of CAA's mainstream communication because it was open to all, not separated as part of a specialty stream making engagement harder (Mitchell and Snyder, 2013). By identifying barriers that were experienced by multiple communities the communication focus changed from engaging people as minorities to developing organisational communication processes to include. This focus in part addresses Dreher's criticism that organisations need to provide systems for minorities to be acknowledged (2012). A communication process that is open to hearing a variety of voices becomes a pathway for the organisation to become inclusive. Nicole described CAA as "exceptional" because they "look wider than disability" to empower all participants to engage which was different to other organisations with specialist streams for focus on minorities (2017). However, norms of practice are not always shared and because they are covert, managers can assume inclusion has been achieved (Hyland-Wood et. al., 2020, p.6). This was the experience of deaf-blind customers when unable to engage via text messaging that was assumed to be more effective for members to participate (Gavin, 2017). The manager was unaware the process was ineffective.

A "hegemony of normalcy" shifts the narrative to emphasise different perspectives (Davis, 2013, Barnes, Mercer and Shakespeare, 1999) moving away from reductively positioning people for specialist attention (Davis, 2013, p.6) to include them as part of the mainstream. Diverse consumers were invited to participate at the annual conference to share their latest innovations and challenges alongside speakers from

government, industry, and other community organisations. This positioning as equals on the program shows the value CAA place on engagement of diverse consumers as part of their business. The exchange created an opportunity to learn about diverse consumers' work as well as others, in a professional and collaborative environment and the communication process is integrated into their mainstream so it is accessible. The organisation's norms of practice enabled diverse publics to engage because their access needs were addressed when their norms of culture were identified and shared (Hyland-Wood et al., 2020, p6). Working with people with lived experience of diversity was a resource for organisations wanting to improve engagement when connections were embedded in the communication system (Chauhan, et al., 2020, p.22).

By empowering publics to develop their own communication, organisations create relationships of trust where information can be shared and built on to create change because they "create partnerships" according to Airhinhenbuwa, (2020, p.2). The community grants program empowered communities to identify their own telecommunication barriers and apply for funding to address them. By collecting evidence and presenting it as part of their grant application, the community taught CAA about the issue and how to address it because they were empowered "to actively engage" (Darcy et al., 2018, p.551). By sharing information, barriers were reduced because understanding was created, shifting the focus from engaging with diverse minorities to engaging with community. A benefit of the community developing their own resources is they know what they need and "what to say to engage their community in their own language" and how to distribute it (Branden, 2017). Noah's example of a successful grant to develop resources for a northern Queensland remote community to warn of a telephone scam was successful and repurposed many times for different Indigenous communities using different languages (2017).

Establishing an inclusive process is only achieved when consumers are empowered to speak up so collecting evidence to argue for change is essential (Noah, 2017). Ciszek agrees, arguing when people "with lived experience are empowered to speak up, the openness and respect that occurs allows for diverse opinions to be heard" (Ciszek, 2020, p.6).

CAA strives to be inclusive and operate to maximise inclusion for all, but they are limited by their capacity to engage (Margo, 2017). To maximise their reach, CAA adopt a strategic communication process but it relies on representatives as members of advocacy groups, grant recipients, participants at conferences and external committees to exchange information (Fiona, 2017). While the process becomes inclusive by mainstreaming communication, individuals who are not connected to an advocacy group or part of a forum, like Will are unable to raise their own issues and are excluded (2017). Ultimately the communication system privileges organisational worldviews and masks exclusion of diverse consumers who were not part of an access program. The goal of advocacy organisations might not be quite the same as the intentions of members. Unpacking "covert elements in organisational culture creates insight" (Halualani et al., 2009, p.26) by "exploring limitations in practice and process to address ineffective communication processes" (Harrison, et al., 2018, p.1). Lukes argues power is ever present, always plays a role and can lead to assumptions that parties are in agreement (1978, p.21). In these circumstances the "promise of voice" (Dreher, 2012) will be unrealised. Communicating across culture is not simple.

Chapter 5

The politics of listening to diverse clients: A case study of a local government organisation

Introduction: overview of case study

This is the second of three case studies examining the communication frameworks and processes that organisations apply to access, engage and include their diverse clients. This case study focuses on a Local Government Organisation, which will be referred to throughout as Metro Council. Compared to the not -for-profit organisation discussed in the previous chapter, councils are generally better resourced to embed inclusive processes in their operations. Further, as democratic institutions, they have an obligation and mandate to include all constituents, including diverse publics. However, their scale and bureaucratic structure can hinder implementation of processes required for genuine inclusion. This research of a government organisation complements the Findings from the not-for-profit and for-profit organisations to comprehensively describe how the business sector includes its diverse publics.

Metro Council was selected because of its reputation as a progressive local authority and because of its attempts to prioritise services for its diverse clients as demonstrated in its policies and processes (Sustainable 2030, Community Strategic Plan, 2017-2021, ACCAN, 2017). The organisation is a large metropolitan council in New South Wales, representing five million people across an area of 27 square kilometres. It employs staff to fill 1,930 positions to service its residents, businesses, workers and visitors (Adopted Resourcing Strategy 2017). Among its constituency, 6.3 per cent are registered as people with disability (PWD) and 41.3 per cent are from a Non-English Speaking Background (NESB) (Adopted Resourcing Strategy 2017, p.18). While the number of people identifying with disability in this report is few, it is argued the statistic are an ineffective indicator of the actual number of people with disability

in the local area because many people choose not to identify as having a disability (Metro Council, Managers, 2017, Sustainable 2030 Snap Shot 2017, p.14). The two communities are identified as Metro Council's largest minority communities. They are the focus of this study because they can be harder to include (Thill, 2015, Goggin, 2009), even for organisations with established processes and policies that comply with the *Local Government Act of 1993* (Metro Council Operations Plan, 2019, Davis, 2006, Vardeman-Winter, 2014).

This case study demonstrated that the organisation's managers and diverse clients had different perceptions of the opportunities available for access and engagement. Inclusion was not achieved consistently, despite Metro Council's carefully worded and designed strategic plans and vision and value statements, all of which demonstrated the organisation's eagerness to include diverse clients. This Findings chapter shows that these differences result from three main factors in the organisation's policies and processes of strategic communication:

(1) An emphasis on policies that focussed on inclusion rather than on meeting the legislated requirements of compliance, but which nonetheless were affected by processes that failed to match the needs and expectations of diverse clients

(2) A range of structural factors that blinkered the organisation in its decision-making and communication processes, including the influence of the political environment and commitment to staff's knowledge and skills around diversity and communication

(3) The complexity of listening and the range of factors that meant that, despite the efforts of the organisation to establish appropriate mechanisms for diverse clients to provide comments and feedback, people with disability and CALD[1] residents were often unable to contribute effectively to decision-making processes that affected them.

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[1] This organisation referred to their NESB clients as Culturally And Linguistically Diverse (CALD) and this protocol is used to report the Findings of this case study

The next section outlines the organisation's strategic communication approach and is followed by a report of comments from Metro Council's managers and their diverse clients, presenting both parties' experiences of access, engagement, and inclusion.

Metro Council's strategic communication approach

Local government authorities have a unique relationship with their clients because they are both elected by them and serve them as elected representatives. They balance their obligations to provide a service that meets legislative frameworks of inclusion with strategies to meet the needs of all their clients. However, even in a democratic system, louder voices can be easier to hear and can dominate the policy and implementation processes. Consequently, diverse publics whose voices differ can struggle to be included because the systems provided to hear them can fail to meet their communication needs. Further, organisations can be unaware they are not engaging because communication can be covert and they are unable to obtain feedback, leading them to make assumptions about the reason for lack of engagement. Additionally, and a factor unique to government, is that the politics of the day can sway the focus and vary opportunities to connect with people who have less power in the debate. Listening offers diverse clients a voice by addressing their communication needs but this assumes that a process is in place for them to be heard. This context is important for reporting the Findings of this case study.

Formal communication processes found in Metro Council's strategic documentation demonstrate their alignment with legislation and commitment to access and inclusion processes. Many of these processes have been established through consultation with people with lived experience of disability or CALD through surveys, forums and consultative panels, as well as informal processes with skilled communicators with established relationships. Government organisations have a commitment to investing in staff training and providing access to reports and statistics to improve their staff's capacity to fulfil their duties (Hastings et al, Profile of the Local Government 2015, p.32). However, they can be limited by the funding allocated and affected by prioritisation influenced by a political agenda. Securing feedback from diverse

communities about their access needs can improve inclusion that leads to co-developed solutions (Sustainable 2030 Community Strategic Plan 2018, p. 90).

Figure 5.1 is a diagram of Metro Council's strategic relationship between state priorities and their overarching and internal strategic plans. It shows communication connections and feedback processes that are one-way and limited to a cycle that must be completed before action is initiated. This Sustainable 2030 Community Strategic Plan (2018) replaces the Sustainable 2030 Plan (2008).

Figure 5.1: Metro Council's Sustainable 2030 Community Strategic Plan

Source: Sustainable 2030 Community Strategic Plan, 2018, p.12
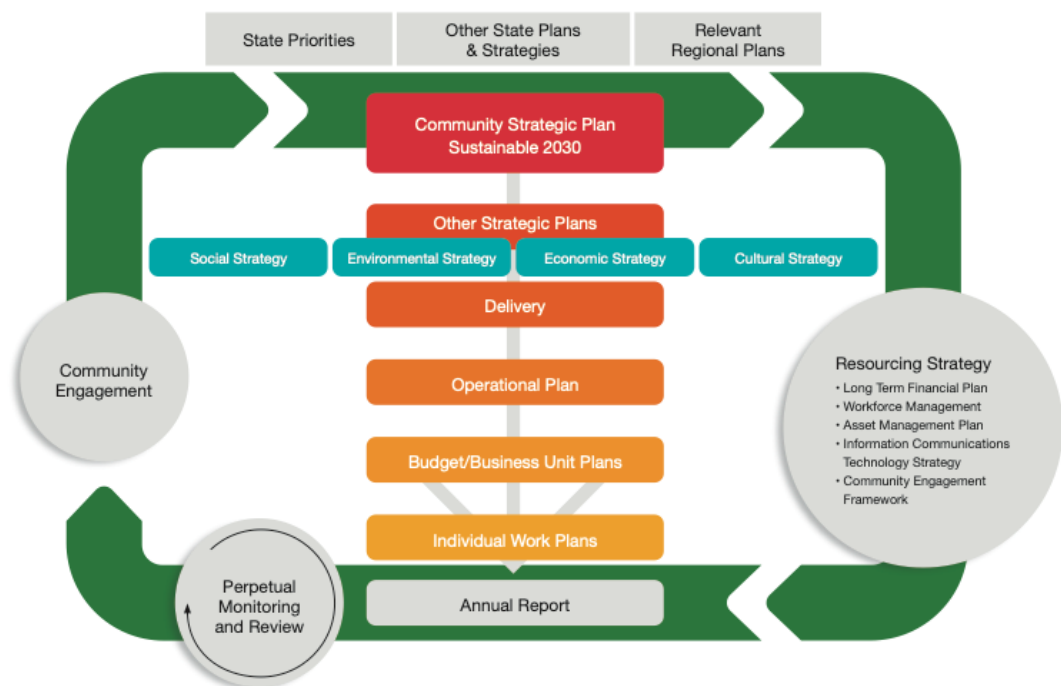
Metro Council's *Community Strategic Plan* sets out the information exchange processes the organisation uses to achieve its goals and objectives which are underpinned by the organisation's values, vision and mission to 'develop a green, global and connected city by providing valued services' (Sustainable 2030 Community

Strategic Plan, 2018). These elements are applied by managers who lead the process to embed inclusive practices in Metro Council's operation.

Metro Council's vision, mission and values are operationalised through ten strategic directions to 'achieve a socially just, inclusive and resilient city' (Sustainable 2030 Community Strategic Plan, 2018). The strategic directions include: being globally competitive and innovative; being an environmental leader; integrating transport; developing a lively and engaging city centre; creating a city for pedestrians and cyclists; engaging with local communities and economies; creating a cultural and creative hub; housing a diverse population; pursuing sustainable development; driving implementation through effective partnerships (Sustainable 2030 Community Strategic Plan, 2018, p.13).

Metro Council's strategic plans and documents are clearly written to reflect their ethos of being inclusive (as expressed in the organisation's values, vision and mission statements) and the primary focus of achieving the organisation's business goals. Here, Metro Council sets out its business agenda, which is reflected in all its formal communication.

Formal communication practices

Metro Council's formal communication processes include internal and public documents and processes and they guide engagement and share information within and outside the organisation.

Processes are also adapted to improve access for the organisation's diverse publics who are harder to engage with because their communication style is different. The council's documents name these publics as a priority because they face barriers to 'full social and economic participation' (Sustainable 2030, Community Strategic Plan, 2018).

Metro Council's communication documents

Metro Council's documentation includes policies, action plans and information on protocols. The documents aim to engage a wide variety of the council's publics to align

with the council's goals and objectives to be inclusive. The documents show a commitment to policies and processes that value inclusion by using accessible language and highlighting the value of inclusion for all the council's publics.

Following are the main documents that have guided Metro Council's approach to accessibility for disability and CALD communities. They span from 2008–2018, because it was a significant period of policy change and were referred to by staff interviewed.

Metro Council's Annual Report 2017–2018 outlines the priorities and resourcing allocated to support diverse clients to reflect the organisation's commitment to include. The Sustainable 2030 Community Strategic Plan 2017–2021, demonstrates the method used to engage with their publics, including diverse publics. The current plan has 10 strategic directions, a delivery program and an operational plan to measure progress against and has been designed to meet new legislative requirements according to the council's community vision. Part of Metro Council's long term Sustainability Policy 2030 (2016) is an "aim to develop 'a social, just and resilient city by strengthening society to improve individual and collective wellbeing" (Metro Council, Sustainable 2030 Community Strategic Plan 2018, p.2).

Success is mapped by the Wellbeing Survey, which is conducted every three years in November/December, to identify personal wellbeing, access to services, recreation and arts activities, community involvement and connection, levels of civic engagement, and health and safety and the replies collected are used to help Council plan services. At the time of data collection, the 2018 Survey reported 6,904 valid responses returned. Responses track progress towards meeting the goals set in the *Sustainable Metro Council 2030*. The survey was distributed to all city households and was available online. It was translated from English into five languages: traditional and simplified Chinese, Thai, Indonesian and Korean.

In addition to Metro Council's overarching documents to guide communication with publics are documents specifically designed to improve the long-term engagement and vision of inclusion for diverse publics. They are the Inclusion (Disability) Action Plan 2017–2021, the NSW Disability Inclusion Act 2014 and Metro Council's Sustainability

Policy. These documents underpin communication processes to guide manager's ability to include through actions that create positive community attitudes and behaviours, by developing liveable communities, meaningful employment and equitable access to mainstream services. Feedback from people with lived experience from the council's Inclusion (Disability) Advisory Panel (IDAP) improves the relevance of the plan (Metro Council, IDAP, 2017-2021). Similarly, Metro Council's Cultural Diversity Strategy 2008–2011, was designed as a blueprint to support cultural diversity in the organisation with a focus on traditional owners, migrants and refugees, and multi-faith and international publics. The document outlines Metro council's legal obligations to include and their strategy to do so with programs of events and activities. It draws on feedback from Metro Council's Multicultural Advisory Panel and regular reviews from advocates, to lead the council into the future (Metro Council, Cultural Diversity Strategy 2008-2011). However, the Cultural Diversity Strategy was abandoned in 2011, along with the advisory panel, in a move to include all publics, except publics with disability, in strategic documents and not separate or essentialise CALD publics. These documents were designed based on Metro Council's obligation to fulfill legislative requirements.

External documents were complemented by internally accessible documents shared between managers and staff to guide engagement with diverse publics and maintain a consistent approach to communication. They include: an Event Guide to establish inclusive events by providing information about physical and intellectual access options and how to adopt them including improving engagement by using appropriate language. Similarly, sharing information about the Code of Meeting Practices, to improve inclusion and engagement by attending to physical practices and language use by designing variations such as the use of audio or visual modes or by providing translations of materials. A Writing Style Guide, outlines the tone and format of all written materials to meet access requirements and organisational branding. The guide encourages users to simplify information and use easy English to improve access, reducing bureaucratic speak. Information about where to access translations and variations of content in audio or visual modes is also provided. Universally accessible

HTML formats are used in all documents to improve access for people who use conversion software, including 'readers and writers' for people with vision and processing needs. Translations are made available on request and documents are available in Metro Council's offices, online, and by request.

Council has adopted the Australian Human Rights Commission's (AHRC) approach to inclusion by counting success against positive actions, like increased engagement with minorities rather than counting the number of complaints responded to (AHRC, 2019). This decision alters the focus from compliance to achieving positive actions for change to inclusion of diverse publics as a human right.

Metro Council has changed the way they have prioritised attention to their diverse publics as observed by a review of their engagement plans for People with Disability. For example, the 2002–2005 Action Plan for People with Disabilities primarily addressed physical barriers, whereas the 2007–2011 Inclusion (Disability) Action Plan addressed participation and access to services and amenities. The 2014-2017 Inclusion (Disability) Action Plan focused on co-design processes informed by advisory panels of people with lived experience. At the time of data collection, Metro Council's Inclusion (Disability) Plan (2017) extended the focus to employment options to improve quality of life (Metro Council, Sustainable 2030 Strategic Plan, 2017). Changes in policy reflect changes in community attitudes and opportunities for inclusion that align with the *Disability Discrimination Act 1992*, the *Disability Inclusion Act 2014* and Metro Council's 'wellbeing' indicators of financial security, employment, education, health, social connection, safety and belonging (Metro Council, Sustainable 2030 Strategic Plan 2017 p.90).

Similarly, the organisations changes to its CALD community's access plan reflects changes to policies as a mirror of societal expectations. These include a move from having an overarching Cultural Diversity Strategy (CDS) in 2008 to 2011 with a Multicultural Advisory Panel to establishing discrete strategies for particular diverse communities according to issues that evolve. For example, in 2012, Metro Council had targeted specific publics via partnerships with groups like the Ethnic Communities

Council of NSW and Relationships Australia to deliver programs for their members based on issues in those communities and in 2017 they included:

- 'Building the Family Tree' forum, a program to address relocation and conflict issues between generations in the community

- the 'welcome zone', a program targeting refugees and asylum seekers

- 'Racism. It stops with me', a program to address discrimination

- 'What's in your name', a program to share heritage with a focus on activities to support international students (Metro Council, Multicultural Community website, 2019).

For some areas where a large number of diverse language speakers reside, the Council holds activities in libraries such as Mandarin language computer literacy classes, Chinese Rhymetime and bilingual storytime. Harmony Day is Metro Council's major initiative to engage CALD publics and to improve community access more broadly (Metro Council, Multicultural Community website, 2019). Metro Council has a longstanding mechanism to engage with Aboriginal and Torres Strait Islander people. An Advisory Panel to focus on their needs was formed in 2008. The commitment to this panel demonstrated an organisational change, with indigenous communities having their own advisory panel. It reflects a change in Council's priorities and aligns resourcing and funding to meet the organisation's goals, objectives and compliance criteria. The change is a major one as it leaves CALD clients who are not associated with one of the council's particular 'issues' of focus without a way of being included.

Metro Council's communication processes

In the period from 2008-2018 that was studied for this research, the communication processes the council used to engage their diverse clients varied according to the issue or the public they wanted to connect with. Some processes evolved according to the council's priorities. The Lord Mayor's open consultation, an event at which any resident was encouraged to speak directly with her to give feedback, had been

regarded as highly effective, but was replaced by consultative committees. The change of process reflected a change in priority.

The council's communication processes included issue-specific workshops, community or stakeholder meetings and roundtables, online consultations, drop-in sessions, surveys, doorknocking and notifications. More formal processes included: community participation planning processes at the strategic long-term policy and planning phase, by participation with the community at exhibitions, consultations, and through submissions (Metro Council, Sustainable 2030, Community Strategic Plan, 2017, p.4). They are advertised to the public the organisation aims to engage in feedback. All submissions made were said to be considered and submitters acknowledged. Additionally, submissions could be made in a variety of forms including by telephone, online or written in the writer's original language.

The Community Engagement Strategy (CES) is another process that guides engagement between managers and the council's clients through public participation. The process involves three phases: inform, consult and/or encourage active participation. The three levels of participation aim to create 'sustained collaboration and new ways of getting involved and empowering the community' (Metro Council Operations Plan, CES 2019, p2). The goals of the Community Engagement Strategy are to provide integrity, inclusiveness, dialogue and influence. Engagement encompasses individual and community meetings, interagency forums, workshops, talks, reference groups, by giving feedback via the Wellbeing Survey, issue-specific groups, door knocking, drop-ins and customer service centre exchanges.

An Inclusion (Disability) Advisory Panel provides the council with feedback on their policies and processes and consists of 10 to 12 members who are residents or professionals of the council's local government area and have lived experience of disability. Membership is renewed every four years and promoted via media and peak groups. Applicants are admitted based on their knowledge or experience in providing independent strategic advice on access and inclusion. They are appointed as independent individuals, not representatives of a group. They meet five times a year and advise the council on strategic planning, policy development, submission writing,

sustainability, community consultation and information provision. The panel aims to improve access and inclusion for all residents and visitors to the council.

A separate panel for Aboriginal and Torres Strait Island people (ATSIP), which was first formed in 2008 brings together up to 19 community and professional members of the council's local government area to give advice on matters of importance to the community. The committee make up requires two elders, two people aged from 18 to 33 and up to 11 from the Aboriginal and Torres Strait Islander community including one member from the council. Membership is promoted via local Aboriginal media and in the community, and applicants apply by responding to a question on how they will contribute to the committee. Members must live, work or study in the council's local government area, be recognised as a member of their community by their community and outline their skills to contribute to the panel (Metro Council ATSI Panel selection process, 2018) The panel meets six times a year.

A further, fifty-eight community groups, including resident action groups and sports, recreation and leisure groups, engage with council on local issues and liaise on issues of mutual interest. Some of the larger groups have council-paid liaison sessions to improve engagement in the process, others are provided with support and information as needed (Metro Council, Community Groups 2019).

Managers improved engagement with their diverse publics because they understood the needs of their publics'. Some managers also held relationships with people with lived experience and they advised on their access needs. However, managers' engagement skills vary and some managers need more advice. The council's communication processes support managers to improve their ability to engage.

Metro Council's people: managers and clients

I interviewed five Metro Council managers and six clients, three identifying with disability and three identifying as CALD, with the aim of understanding their experiences of access and engagement.

Of the managers, three reported to the council's City Life section. Their focus was on engaging diverse clients. Two managers held general roles in planning and workforce communication. These roles aimed to engage all the council's publics including the organisation's diverse minority clients. Table 5.1 list the managers interviewed and their roles and reporting areas within the council.

Table 5.1 List of managers interviewed and their roles and reporting areas

Note: all names are pseudonyms

Interviewee	Role	Reporting area
Alice	Manager of Strategy	City Planning, Development & Transport
Chris	Manager of Policy	City Life
Hannah	Manager of Community	City Life
Bree	Manager of Events	City Life
Matthew	Manager of Communication	Work force services and Information Services

A description of each manager's role and link to the organisation's overall strategic direction and reporting protocols follows. This is significant as it shows the prioritisation of particular roles and how they are valued and resourced to ensure inclusion of diverse publics.

Alice manages Social Strategy within the Research Strategy and Corporate Planning section of Metro Council. Her role aligns with the council's protocols to engage by researching the needs of all the organisation's clients, to develop policies and processes to include them and obtain their feedback. She reports to the Planning, Development and Transport section, which in turn reports to the CEO (see Table 5.1). The communication activities undertaken are outlined in the council's *Annual Report* and demonstrate resourcing allocated and results achieved. The outcomes feed into

the council's overarching Community Strategic Plan 2030 (see Figure 5.1) and align with actions that fulfil the organisation's legislative requirements for engagement and inclusion under the *Local Government Act 1993*. Alice is of Anglo Celtic origin and says she is passionate about ensuring that Metro Council includes and engages with the community (2017). Alice aims to include all the council's clients, but she also has a list of target clients with whom she specifically aims to engage.

Chris is an experienced researcher who is committed to ensuring the inclusion of marginalised groups of people. He manages the implementation of policy specifically related to accessibility for people identifying with disability. Chris did not indicate whether he identified with a disability. He is of Anglo Celtic background. His primary focus is to support the Disability Inclusion Panel and ensure disability and inclusion are at the forefront of Metro Council's planning. He prepares policy documents in the format required by panel members, facilitates the meetings and reports feedback on policies and processes to the council. Chris reports to the Manager of Inclusion. Even though he was a new staff member, he said he could see there was a great focus on inclusion (2017).

Hannah manages community engagement and has been a long-standing member of the council's management team. She has a reputation as an experienced facilitator for effective engagement with people from a Non-English Speaking Background (NESB) who are referred to as Culturally and Linguistically Diverse (CALD) and Language Other than English (LOTE) community members at the council. She is from a Chinese background and she is known as someone who will look to the community for feedback on the processes developed. She has established long-term relationships with many residents, professional associations and representatives from migrant groups. Her focus is on social cohesion and working to engage with the most vulnerable.

Bree is an event manager who becomes an inclusion officer for all the council's minority clients during major events. She aims to maximise engagement and inclusion with people of all abilities and cultural backgrounds and she is guided by the council's

Accessibility Action Plan that has been in place since 2011 and is now known as the *Inclusive Events Programme*. She did not say whether she identified with a disability but she did indicate that she has 'an extensive interest in this area' (2017). Bree is from an Anglo Celtic background.

A journalist and an IT expert, *Matthew* is a manager of the council's website. His goal is to make the website as accessible and interactive as possible for all the council's clients and he advises council staff on how to make their materials clear. His previous work involved supporting people with disability by offering a variation of services and he builds on this experience in his day to day work. Matthew did not identify with disability and is of Anglo Celtic background.

As advocated by Fink (2010, p. 64), the managers' and clients' experiences of access and inclusion are described using their own words.

Managers' experiences offering access and engagement

Managers and their diverse clients had different experiences of access and inclusion. All managers assumed their process effectively included, even though some said, 'it could be improved' (Alice, Hannah, Bree 2017). The communication framework for access, skills to identify effective engagement, feedback obtained and applied and promotion of access were identified as significant in the data gathered to describe managers' experiences of including their diverse clients.

Nine questions were asked of managers about the processes they use to engage their diverse minority publics. In summary, the questions asked: how the managers decided whom to engage and include, what informed that decision, who was engaged and if they thought clients were included, how were they included, and was it successful? Managers described engagement processes, how they were developed and resourced, and whether skills were shared and promoted across the organisation.

Metro Council established a number of frameworks for managers to engage their diverse minority publics to comply with the council's commitment to the *DDA, 1992, DIA, 2014 and LGA 1993* (Hannah, Bree, Alice, 2017, Metro Council, Sustainable 2030 Strategic plan, 2017). For example, Alice used the council's Community Engagement Strategy (CES) to engage publics. The Inclusion (Disability) Action Plan guided Chris's inclusion of clients with disability and Hannah found the council's Social Policy and Strategy effective because her focus was 'including CALD publics' who no longer had a separate advisory committee for feedback (2017). Bree set up an access steering committee of people with lived experience of disability for advice on how to improve access to the event she managed but struggled to engage CALD clients because she did not have contacts (Bree, 2017). Matthew used readability tools to ensure consistency and simplification of messages to the council's publics and provided variations of content as requested (2017). Chris applied the Inclusion (Disability) Action Plan 2017-2021 to guide engagement with the council's publics with disability. He was "guided by people with lived experience of disability" so it was his main focus (Chris, 2017). Each manager used a different formal framework to access their diverse minority publics according to the public they aimed to engage and their understanding of that public's access and engagement needs.

The formal engagement framework was improved by informal communication processes managers used by engaging with their diverse clients or with managers who shared experiences of access. Alice reported relying on Hannah for advice on accessing CALD communities and Chris for advice from the Accessibility (Disability) Panel members. The formal processes gave Alice access to informal feedback she was unable to access herself because she did not have the connections (2017). Similarly, event manager Bree, found that informal relationships with people with disability at the peak bodies she was connected with gave her access to people with lived experience of disability, which improved her processes. However, she did not have the same access to CALD publics (Bree, 2017). She said the lack of connection affected her ability to provide access to the 700,000 international visitors to the fireworks event she

organised (2017, Metro Council, 2018a). She described disappointment after the extra effort she went to engage CALD clients by translating information about the event into five languages, because the translations were not accessed (Bree, 2017). As a consequence, she assumed CALD publics did not need a translation and she said she 'wouldn't do it again' (Bree, 2017). It was a cost she could not justify. For managers less well connected or who did not share culture with their diverse clients, the offer of engagement could be misunderstood or missed. Informal communication processes improved formal frameworks because the relationships helped managers to understand the exchange, and understanding improved access.

Consultative panels were one way that Metro Council captured feedback from their diverse minority publics. Part of Alice's role as manager of strategy for the council involved the establishment of community advisory panels to improve engagement with communities that she said were prioritised as 'harder to reach' (Alice 2017). Alice said the Accessibility (Disability) and Aboriginal and Torres Strait Islander (ATSI) panel members provided invaluable feedback on the *Community Engagement Strategy* (CES) and other policies and processes. The Multicultural Advisory Panel had been dissolved following a government initiative to avoid discrimination by separating CALD clients out for attention (Alice, 2017; Hannah, 2017). Managers agreed there was merit in simply making 'activities accessible for everyone to attend or participate' (Chris, 2017). However, the change of focus from having a separate Multicultural Advisory Panel and dissolving the 'Cultural Diversity Strategy in 2008-2011' removed the overarching framework. As a result, the focus on access and opportunity for broader engagement was reduced. The policy and panel were replaced by a series of discrete targeted initiatives based on issues arising within the CALD community. While the initiatives represent an important focus for many, the lack of an overarching framework where anyone can have a say is likely to affect the 12,965 residents and more than 700,000 international visitors who may not share culture or speak English well (Metro Council's profile of non-English speakers, 2016). The move to a more cohesive process may avoid segregation but it represents an opportunity cost for excluded CALD publics. This contravenes the Australian Human Rights Commission Action Plan's aim 'to foster a

sense of belonging, ownership of solutions and empowerment to improve individual and communal wellbeing' (AHRC, 2013 p. 4).

Formal consultative committees were 'not the be all' according to Hannah (2018). She said, 'just because you have a voice, share language and have an advisory panel doesn't mean it's effective' (2017). Hannah questioned reliance on panels and argued they were 'gatekeepers of feedback' (2017). She found panel members can have their own agenda and their comments can skew outcomes that are not representative of the larger group (2017). While the council's terms of reference claim panel members' views are independent and not representative of a group (Metro Council, Sustainable 2030, Community Strategic Plan,2017), they are nevertheless, relied on by managers for feedback on the design of policy and processes.

All managers agreed that empowering unengaged clients was their biggest struggle but it also offered the greatest benefit because, as Hannah said, 'we need to hear from the most vulnerable in our community' if we are to be truly inclusive (2017). Managers who had relationships with disengaged clients had the best chance of hearing their engagement needs. However, Metro Council mostly communicated with clients who were already engaged and they relied on peak bodies with whom they had relationships to help them. For example, Chris said, 'if we want to specifically target mental health, we would go to the peak body that we've got a relationship with and go through their Facebook and social channels' (2017). Having a relationship with peak bodies helped managers engage with some harder to reach, diverse clients but the relationship also masked inaccessibility for the clients not connected to their association and these clients then became further estranged.

Hannah argued that 'listen[ing] at the grassroots' enabled her to secure feedback from people with lived experience of developing engagement strategies but she warned that clients vary and managers have limited skills. Nevertheless Chris, Bree and Alice maintained that consultative panels were a valuable tool for quick feedback and provided them with opportunities to co-design information having the added benefit of developing ongoing relationships with harder to reach publics (2017).

Metro Council is constantly evolving to manage 'competing priorities' pitched against its available resources. Its prioritisation of these resources affects the establishment of engagement with its diverse and often minoritised clients who are generally harder to reach (Hannah, 2017). In the main, managers accessed their diverse clients according to formal processes offered by the council. These contacts were improved by informal relationships shared with other managers and clients. A benefit of the informal process was that managers learnt there were other ways to offer access and this realisation challenged their own norms of practice.

Skills to identify effective engagement

All of the managers interviewed had experience engaging with the council's diverse clients but their access varied according to their experience and contacts. Some managers based their access and engagement strategies on data collected through surveys and statistics. Others took advice from peak bodies, consultative committees and advocates who were in contact with people with lived experience. Both sources improved managers' understandings of their clients' access needs but having a relationship with a person with lived experience gave managers insight that enabled engagement.

Alice used the council's formal data collection systems from the annual Residents' Survey, managers' feedback from events and advice from advisory panels to develop the Community Engagement Strategy. The mixed approach improved her capacity to access the diverse clients who already had a connection to the council in some way. However, the needs of clients who did not fill out a survey or attend an event or sit on an advisory panel were missed. In other words, the council was engaging with publics known to them because the system they had developed met these clients' needs. Alice and Hannah said many residents did not contribute to the council's Residents' Survey. In particular, clients with disability did not always identify in this way, as is their right, but their lack of feedback affected the organisation's understanding of the resourcing they needed for engagement. Hannah found some clients were unable to access written material because they were unable to read English. The council's *Social Atlas*,

based on census data, is the main tool the organisation used to provide background context about its residents to understand their needs. The atlas provides very detailed information but residents' literacy levels were not indicated (Metro Council, Social Atlas, 2016, Education). The Residents' Survey is the main tool for council to understand clients' needs and to plan for the future but a response rate of 6,904 seems insignificant compared with a population of 240,229 residing in the local government area (Metro Council, At a glance website, 2018). When residents do not respond because they are not aware of the process or not able to access it, they miss the chance to describe their communication needs. Inaccessibility directly impacts engagement and affects resourcing distribution according to Hannah, because 'if it isn't recognised, it isn't funded' (2017).

The Inclusion (Disability) Action Plan that was developed with advice from their Advisory panel and data collected from the council's resident survey effectively guided Chris' engagement with clients with disability (2017). Accompanying this plan was 'an implementation strategy' also designed by people with lived experience of disability to address specific access needs that other managers may be unaware of (Chris, 2017). Chris said it made a significant difference to their ability to engage (2017).

Metro council's *Social Sustainability Policy* guided Hannah's engagement with CALD clients by drawing on data from the residents' survey but she also 'listened to people with lived experience' at events (Hannah, 2017). Hannah was the only manager who described herself as coming from a CALD background. She said it had a positive impact on her capacity to understand some of the cultural barriers that affected the council's clients' access and engagement. On the other hand, Event Manager Bree, who did not identify with disability said she learnt from her own mistakes. She designed a communication process she thought would engage her clients who identified with disability that was later found to be inadequate (2017). The failure prompted Bree to establish a steering committee of 'people with lived experience of disability' to help her identify issues early and design more effective communication processes, avoiding wasting time and money by rolling out ineffective solutions (Bree, 2017). Bree found the improved engagement built contacts that gave her advice on developing more

effective processes for people who identified with disability but she said she was unable to have that same access to CALD clients. Bree did not have any connections to CALD communities. She relied on the communications team to develop engagement with them. Managers structured engagement according to their policies, the data they held, their contacts and their understanding of their diverse minority publics based on past experience.

Sharing successes and challenges improved managers' skills at problem-solving and built contacts, according to Alice, Bree, Chris and Hannah, but there was no formal knowledge transfer (2017). These managers became the 'go to' experts for advice on engaging the organisation's diverse clients and while all managers were happy to be recognised this way, they described the additional requests as a burden at times (Hannah, Bree, 2017). Bree described herself as a subject expert, designing processes to engage people with disability but not a communication expert. She recalled other managers assuming she could give advice about varying and distributing content for these publics but Bree said she did not have the expertise (Bree, 2017). Hannah tried 'to connect with harder to reach communities' by attending grass roots community events like the council's annual Harmony Day celebration because she could 'engage with people in their own environment where they feel comfortable' (Hannah, 2017). Hannah said this type of engagement was key to developing trusting relationships. Even though many people saw Harmony Day as a tokenistic display of dance and food, she disagreed because 'the event gave [Metro Council] access to publics [it] would usually miss' (2017). Exposure to the council's unengaged diverse minority publics helped managers develop confidence to engage them, but contact was inconsistent because the process was informal.

The four community managers had excellent contacts to advise Metro Council on how to engage with their clients who were already engaged and how to vary information to improve access but they did not know how to promote access to diverse clients who were not connected. They were not specialist communicators. The organisation assumed that because they were engaged with their diverse clients, they could provide

appropriate and relevant services because of the relationships they had developed. Metro Council were unaware of the short-comings in their communication processes.

Alice found peak bodies repurposed information to engage their members. By working with them she found she could extend engagement beyond her own contacts (2017). Bree also asked for 'feedback from peak bodies to help [her] develop processes' and she found there was a side benefit of getting to know people with lived experience to understand their needs (Bree, 2017). The contact enabled her to design more inclusive processes in the format people needed (2017). Hannah said the council 'couldn't work alone; having a close partnership was important' (2017). Working with peak bodies who had direct access to harder-to-reach clients allowed managers to build relationships and provided them with advice on better access and engagement processes. Diverse clients not connected to a peak body or unfamiliar with the organisation were not engaged and managers did not have a way to access them.

The exceptions were events where anyone could come and have a say, such as the [now abandoned] Lord Mayor's community forum. Hannah described it as a good place for Metro Council to identify emerging issues because 'people were free to speak for themselves' (2017). However, for clients to engage they needed to know that the forum was on and have the capacity to speak up. Alice said the process was daunting for many diverse clients because they were unable to represent themselves effectively in a public forum (2017). Hannah agreed that many of the newer communities didn't feel able to speak up (2018). She saw her role was to empower them (2017). Diverse clients often communicated differently and expressing themselves in a public forum could be challenging even when they had the knowledge and skills required. In this case diverse clients did not have the agency needed.

Engagement was not always effective for diverse clients. Alice was unable to access clients from a Chinese background even though she used the *Community Engagement Strategy* and drew on advice from specialist managers and translators (2017). She described putting on community BBQs and door knocking clients' homes to discuss a major infrastructure project affecting them, but no one turned up or answered the

door (2017). According to Alice, disengagement occurred because they were 'unfamiliar with deliberative democracy and came from countries where they did not trust the government' (2017). She acknowledged 'building trust takes time'; and when culture was not shared between managers and clients, misunderstandings frequently occurred and were often not identified until clients were surveyed (Alice, 2017). Alice said, 'we need to do better' but she was unsure as to how (2017). She argued a deliberative democracy approach to inclusion enabled everyone to have a say but it relies on all parties engaging and reaching consensus (Alice, 2017).

Sharing meaning within an exchange between diverse minority publics is complex because parties easily misunderstand each other when norms of practice and power relations are not shared, leading to distrust.

Feedback obtained and applied

Managers developed effective strategies to engage their diverse clients when they were able to make contact and gather feedback about their access and engagement requirements. However, the variations developed did not always successfully include them. This research found managers could be unaware of this.

The Residents' Survey was the council's main feedback tool and input from advisory panels and peak bodies informed policies and processes but input was limited to members of these groups. People who engaged with the council's website were asked to feedback every time they engaged and this feedback confirmed the number of times publics accessed information. In addition, Alice said clients gave feedback 'at public exhibitions, and managers polled opinions at community BBQs, events, community centres and libraries' (2017). Interested clients could make a submission on specific projects, write a letter in their own language and the council would translate it or they could provide a verbal submission via the telephone interpreter service', as extended options to include diverse clients (Hannah, 2017). However, clients needed to be aware these options were available. To improve the breadth of feedback to incorporate more diverse publics, Metro Council mandated that a percentage of responses should come from their diverse groups via the Residents'

Survey, according to Hannah (2017). However, Alice and Bree said many diverse clients were unaware the survey was available even though it was the council's main tool for future planning. Likewise, managers knew many people with disability did not identify themselves this way nor did they have access because of language or reading proficiency (Alice, Bree, Hannah 2017). Bree said the survey was not promoted to diverse clients who were not already connected to the Council and this limited their feedback opportunities (2017).

At the same time, Metro Council made its online documents accessible by offering them in HTML format, as noted above. The simple change to file format improved compatibility with document conversion software, according to Matthew, and the people who needed different formats were able to have access to the content. Matthew said a simplified focus on content helped staff keep their message clear, and it was much more accessible for all clients (2017). Hannah said she was proud of the council's commitment to variations as it 'demonstrates an attitude that runs through everything we do' (Hannah, 2017). Alice agreed, explaining that 'the Sustainable Metro Council 2030 easy English version' was so popular they always provide an easy English version of all policies (Alice, 2017).

Managers agreed that clients influenced the way the organisation offered materials through feedback and their actions but when diverse clients gave feedback they extended current processes beyond the organisation's norms of culture and improved access for many publics that the organisation were unaware of. Further, Metro Council applied feedback from diverse publics when relationships with people with lived experience were heard and it informed their processes.

Managers' ability to engage and include their diverse clients was improved by relationships held within and external to the organisation. Alice said she, 'ask[ed] [peak groups] to communicate for us ... and bring us feedback' which improved engagement because they knew how to engage their members (2017). Examples of collaboration with specialist organisations included work with Vision Australia to deliver alternative formats and improve access for people with vision impairment and

with People with Disability Australia (PWDA) to have input to the design of 'Easy-English' versions of materials, where a mix of visual representation and simplified text combines to support people with intellectual disability improved access for many (PWDA p. 11). The collaboration benefited the organisation because the variations they provided met the clients' access needs. The contact enabled managers to build relationships and improve access for their diverse clients. The information shared improved the council's internal and external communication processes. Hannah argued that this informed the cultural change essential to achieving inclusion (Hannah, 2017). Chris supported staff and clients who identified with disability by providing resources recommended by the council's Inclusion (Disability) Advisory Panel or by designing protocols and courses to increase staff awareness of processes.

All managers wanted to engage with people with disability, but Bree found many were nervous and she put it down to not 'want[ing] to offend, or get it wrong and they become awkward' (2017). Chris argued that staff need confidence and he advocated for greater exposure to diverse minority publics. However, Chris found that an online e-learning module he managed that was designed to upskill staff on inclusive behaviour was rarely accessed. Chris said the module was voluntary and, the 'people who complete it don't need it', according to Matthew, because they are already engaged (2017). The engaged staff and clients were committed to inclusion but many staff and clients were excluded and the organisation was unaware of this. The council described a commitment to compliance with the DDA 1993 and DIA 2014; however, the training needed to improve processes was voluntary and it diluted Metro Council's opportunity to address the gap in skills for many managers unaware of, or unfamiliar with, diversity.

Internal communication was improved by updates on disability inclusion activities at regular meetings. This was an improvement on having disability specific meetings because more people became informed about access issues and were encouraged to have greater involvement. Likewise, Bree argued progress was made when 'separate meetings of staff who worked on inclusive strategies' changed to two forums a year for

all staff to attend, sharing resourcing and avoiding having to have a separate process (2017).

The change was positively received, and it was one of many processes that demonstrated the improved access that followed on from a change of name and purpose 'from disability reporting to inclusion reporting' (Chris 2017). A new event plan guideline to support staff to lead engagement with their diverse colleagues and encourage staff to rethink the ways they include was circulated and embraced, according to Chris (2017). This plan demonstrated the move from the name of 'disability' to 'accessibility' and while it was subtle it proved to be a powerful game changer. For example, variations of content were available in plain and easy-English versions that were originally designed to address the exclusion of people with reading and information processing issues. The offer of this variation not only improved access for people with reading and processing disabilities, it also improved access for people from a NESB and older people who wanted a simplified version of information that was easy to understand. One variation that was initially focussed on disability improved access for many when its name changed.

Externally, Metro Council managers worked with their trusted advisors from panels, expert advocates and peak bodies to provide feedback on processes to improve accessibility (Alice, 2017). Chris described their 'ongoing commitment to inclusion' and cited feedback from what seemed an unrelated policy on Waste Management and Street Cleansing, about which their Inclusion (Disability) Advisory Panel provided very helpful advice. They recommended using tactile braille lettering on the top of rubbish bins for vision impaired people, and images on the side of bins for people with limited reading and language proficiency, and gave advice on the placement of bins to avoid congestion near bus stops, especially for people using wheelchairs or prams (Chris, 2017). Chris said the panel's feedback improved access for multiple clients, not only for clients with disability.

Event Manager Bree described learning from her own mistakes when she tried to improve engagement with low vision and sight impaired clients because she

misunderstood their needs (2017). Bree was asked to provide 'an audio description' of the New Year's Eve fireworks event and the team prepared what they thought was needed (2017). Bree described 'interviewing pyro-technicians and event managers and putting together an audio package that played at the time of the fireworks' to find it did not engage the clients (2017). She said, 'they wanted a description of the fireworks, the star bursts and rockets' (Bree, 2017). She learnt from feedback and 'it changed the way I approached engagement' (2017). Bree said, 'you can tick a box to say, "yeah audio description done", but whether it is effective, inclusive … you don't know until you get the feedback.' (2017). A consequence of the miscommunication was that Bree learnt to listen to people with lived experience and it changed her assumptions and the way she engaged (2017).

Feedback from diverse clients was identified to improve access but the engagement process for CALD publics was no longer formalised through an action plan to monitor success. Matthew said not having a dedicated CALD advisory panel obscured 'their needs' and reduced the CALD profile in the council (2017). It was harder to obtain feedback from a range of CALD clients because fewer processes were available. Hannah said a key challenge for the council was 'empowering the community [to engage]' because cultural norms differed and people often misunderstood one another (2017). Alice found her intent to engage with a Chinese community to obtain their feedback about a major infrastructure change was misunderstood as checking up on what they were doing. She wanted to get their feedback on the development and her usual engagement methods and advice from multicultural specialists and translators failed. She put it down to not sharing processes and said it caused distrust (Alice, 2017). Hannah agreed. She said, 'newer [migrant] communities are not empowered to speak up' because they have different experiences of engaging with government (Hannah, 2017). However, clients may not have seen the value in giving feedback. The reason for not engaging is not clear, although the managers put it down to a lack of trust.

Feedback collected from clients identifying with disability was more likely because they had a legislative framework underpinned by the DDA (1993) and DIA 2014. The actively

engaged clients were aware and connected to improve their access because their needs were accommodated. However, less aware or latent clients who were less involved could be excluded if their access need or a variation was not asked for or provided. The council was mostly talking to clients who were already engaged. While they advertised that anyone could ask for a variation on the way content was presented to improve access, clients needed to be aware the option was available. Wider promotion beyond the council's already engaged clients was rarely budgeted for (Bree, 2017) and managers lacked the specialist skills to engage their diverse clients.

Promotion of access

All managers agreed promotion of accessible variations to their diverse clients was essential and that they had in place a system to improve access. A commitment to promoting inclusion was demonstrated by dedicated roles of an 'Inclusion Diversity Officer' in every library and support for an 'Inclusion (Disability) Accessibility Panel' but the capacity and confidence of staff to engage varied (Hannah, 2017). A formalised opportunity to share the council's initiatives to include their clients was complemented by informal relationships, but by sharing resources informally the organisation was unaware of their contribution. Further, the informal process created a burden for skilled managers who became the 'go to' for all matters of inclusion. As Metro Council were unaware of the importance of informal relationships, they missed the chance to identify a gap and upskill more staff.

Variations were often promoted through mainstream services, not directly to the diverse clients who needed them, because managers were not experienced communicators. Matthew explained the effort Council put in to ensure their website adopted the latest accessibility guidelines (Web Content Accessibility Guidelines, WCAG2) and how easy it was for people to obtain translations. In fact, Matthew said no-one had been refused a variation (2017). However, to access the request page for a translation, clients need to know it is available and where to access it. To do that they need to know the website and read English. Accessibility was offered but its services

were paradoxically inaccessible for many diverse clients, a fact many managers were unaware of.

None of the managers interviewed for this study said they had the marketing skills needed to engage with the diverse clients with whom they did not already have a connection. The organisation assumed communication was happening because they had relationships with many diverse clients. The council did not provide an additional marketing budget or staff to promote access to diverse clients unless it was pre-agreed (Bree, 2017). At times, variations of content were prepared based on an assumption that a translation would encourage inclusion, to find the resources were not accessed. When resources were not accessed, managers incorrectly assumed [the variations] were not needed and said they 'would not offer them again' (Bree, 2017). The assumption that their diverse clients were unaware a variation was available was not considered.

Communicating with clients who are not already engaged was only considered for specific targeted programs, even though inclusion was a compliance condition across all the council's activities related to the *LGA, 1992, DDA, 1993* and *DIA, 2014*. The council did not look to extend engagement because it assumed it effectively connected with the publics it needed to. Managers developed networks of advocates across the sector to help design communication that was accessible but the networking efforts were limited to discussions with peak organisations and many clients were not connected (2017). Alice admitted that communication processes were a work in progress and she said she was continually searching for best practices (2017).

Misunderstandings and missed opportunities occurred when inclusion was assumed but not achieved. This often occurred because norms of practice that were not shared between clients and the organisation prevented the organisation from effectively engaging with and including their diverse clients because their norms of culture differed.

Clients' experiences of access and engagement

Clients and their relationships

Six clients were identified because they voted, worked or participated in activities of the council or in the local government area. Three were from a non-English speaking background, three identified with disability and two identified as both. Two were selected because they were actively engaged, two were identified as aware and two were latent, according to comments made by managers in interviews (but not referring to any individual by name). Clients were selected because they had a range of engagement levels with council, to avoid only hearing the views of the most actively engaged. This is in line with Miles, Huberman and Saldana's advice to incorporate perspectives from the periphery and centre for comparison (2014, p.37). The actively involved clients were more likely to have a relationship with the council and it improved their access because they became familiar with the organisation's practices. Aware and latent clients had less opportunity to develop a relationship with the council and this affected their access and their opportunity to learn about the organisation's offer of inclusion.

Table 5.2 List of customers interviewed by name, diverse background, level of engagement and relationship to the organisation

Note: all names are pseudonyms

Interviewee	Diverse Background	Level of engagement with the organisation	Relationship to the organisation
Michelle	Disability	Active member	Member of an Inclusion Advisory Panel
Nicole	Disability	Aware member	Member of a peak body for people who identify with disability
Rod	Disability	Latent member	Member of a peak body for people who identify with disability who are indigenous
Huan	NESB	Active member	Community grant holder and member of a Community Centre
Angela	NESB	Aware member	Resident of a community with a large number of people from diverse & low socio-economic backgrounds
Hui-Ru	NESB	Latent member	Member of a community and attendee at Council's bilingual storytime group.

The following paragraphs describe each client by pseudonym.

Michelle is a resident of Metro Council's local government area and an active member of the Inclusion (Disability) Advisory Panel, which gave feedback on the accessibility of the organisation's policies and processes. Michelle identified with disability and described herself as 'deaf, able to speak my first language and lipread' (2017). Michelle applied to be a member of the Inclusion (Disability) Advisory Panel after seeing an advertisement in her local paper. She was one of 10 clients selected because she fitted the criteria of having disability. Michelle said she was keen to contribute to the council

to improve access for all residents (2017). Her self-ranking of her level of engagement matched the council staff's estimate of her engagement.

Huan is an active member of the Chinese community and recipient of two community grants that enable her to run workshops with members of her community and other NESB residents. Huan is retired and is a senior member of the Chinese community. She said her first language is Chinese and her second language is English. She found out about the grants from friends and now applies annually to contribute volunteer hours with Metro Council support to run 'Laughter' and 'Tai Chi' workshops. Huan is known by council staff as actively involved with the community and Huan agrees (2017).

Nicole identified as an aware client with low vision. She had extensive knowledge of the council's processes to engage its clients who identified with disability because of her role as an advocate and advisor on access. She described, 'the council [a]s a large organisation with a diversity of workforce and while it does want to be inclusive, it is a political beast that can be swayed by external factors' (2018). She was able to read amplified text and unable to read braille. Staff from the council described her as actively involved on particular issues. She described herself as aware.

Angela was from the Philippines and her first language was Spanish. She also mentioned she had a disability. Angela was regarded by the LGO as actively engaged but she said she didn't feel engaged. She was an active member of the local community but not the council. She positioned herself as aware of the council, and the mismatch highlighted their differing expectations of the relationship.

Hui-Ru was a young mother from a Chinese background and a latent client of Metro Council. She was aware of the organisation's services but the council never approached her, even though she fitted their criteria as a member of a public the organisation wanted to improve engagement with, in an area where a major infrastructure project was underway (Alice, 2017).

Rod was also aware of the council but he was not engaged. He said he surveyed his office and his staff members said 'they had never been approached' to engage, even

though he was part of the only organisation that supported First Nations people with disability in the area (2018). As a consequence of this status, his relationship was regarded as latent. While Rod had the capacity to engage with the council he had no immediate need to do so. Likewise, the council had its own Aboriginal and Torres Strait Islander (ATSI) advisory group and it saw no need for any further interaction at that time (Alice, 2017).

Of the clients interviewed, one agreed with the description of them by council staff as active, three said they were aware and two said they were latent because they were not engaged. The council's understanding of its clients' levels of engagement differed from that of the clients', confirming perceptions of their relationships differed.

Seven questions were put to clients about their experiences and their relationships with the organisation, how they were engaged and whether the process was adequate to include them. The examples are presented in the interviewees' own words to give them their voice and improve authenticity in reporting their experiences.

Three themes were identified and reported on: awareness of access processes, access that led to engagement, and opportunities to provide feedback for inclusion.

Awareness of access processes

Clients had access to Metro Council directly via the website or in customer service centres. If they needed a variation, they could approach staff they held a relationship with or take up a promotion that appeared through public notices in newspapers, in their offices, libraries, on community radio, at events, via signage and through peak groups.

The active clients were more likely to be aware of ways to access council's services than aware or latent clients because of their relationship with the organisation that enabled them to be familiar with the council's processes. For example, Michelle was part of the Accessibility (Disability) Advisory Panel (2017) and the panel asked her "what she needed to be included" (2017). Huan was well connected to her local community and to managers she shared her 'love of diversity with', especially 'one

from a Chinese background' (2017), whereas latent clients Rod and Hui-Ru were not aware that they could access the council. They had no expectation of engagement, they were unfamiliar with council protocols and they knew nothing of any advertising about engagement by the council. Rod said access would be beneficial, given that he represented the only peak body in the local government area for First Nations people with disability but he conceded that many communication strategies only look at culture or disability, not both (Rod, 2018). He said no one will think 'there might be a cultural element within disability access' (2018). Rod said it had an impact on the way access was offered for indigenous people with disability.

Trust was a key element for First Nations people, given their history of disempowerment. Developing trusting relationships takes time (Rod, 2017). Hui-Ru looked to engage with local activities but she was not connected to any of the council's processes (2018).

The two aware clients, Nicole from a disability advocacy organisation and Angela, a resident from a NESB background, had a relationship with the council because they represented the minority clients the council wanted to hear from (2018, 2017). They both had access to the council because they were approached to give feedback on consultations. Nicole had access as a person with low vision because she could use software to enlarge materials but Angela was never asked for her access needs (Nicole, 2018, Angela, 2017). Angela did not present with a physical disability or declare one, and she spoke English, but she was unable to access any written material because she was unable to read. She said, 'people like me [in my neighbourhood] mostly don't read, and the council write letters we can't access' (2017). Angela only had access when the council engaged with her verbally but the council was unaware of her limited literacy.

The actively engaged clients, Michelle and Huan, had the greatest access because they were invited to engage with Metro Council and the contact enabled them to build relationships that improved their access. Michelle's experience differed from Huan's because she was asked what she needed for access and it was provided, whereas Huan

was not asked. She was fluent in English but her cultural norms differed and Council staff assumed she had the access she needed. They were not aware Huan faced barriers accessing the council because her norms of culture differed. Offers of access made by Metro Council to aware clients varied according to the council's needs, and compliance criteria and latent clients were not directly offered access. There was an assumption they could have access if they wanted, but this was not always the reality for these clients. Access was improved for diverse clients when the council built relationships and trust was created because the organisation became familiar with these clients' needs.

Access that led to engagement

Engagement with Metro Council was improved when clients' communication needs were recognised and listened to through feedback that offered variations to suit their needs.

For example, Michelle, who was deaf, was a member of the Inclusion (Disability) Panel. She participated in meetings with the help of a stenographer who typed up conversations so she could read them. She said, 'they asked me what I needed to be included and provided it' (Michelle, 2017). Michelle found that when the panel met, they were able to develop engagement strategies that had an impact that was more far-reaching than was first realised, often extending access to other communities. In one instance, the panel discussed the location of ramps to a central park in the local government area. The ramps were designed for wheelchair users but they had benefits for people using walking sticks and walking aides, as well as parents pushing prams (Michelle, 2017). Michelle described the panel as 'a wonderful team' (2017).

Aware client Nicole, with low vision, said the council supported her attendance at meetings and involvement in consultations by giving her the access she needed (2018). Likewise, Nicole was familiar with the council's access processes that were 'always improving' but she said the extent to which people with disability could engage with the council varied (2018). She described the Mayor's Access Forum, where anyone can ask a question of the Mayor, as a great opportunity to engage directly but she said it

was 'inaccessible for many people unfamiliar with engaging with local government' (2018). Nicole said they would 'need to speak up in front of large groups and follow government protocols' which was challenging for many people (2018). Active client Huan said she was unable to represent herself [at the Mayor's Advisory Forum] 'because it was intimidating' (2017). She did not share norms to effectively engage with the council's systems on offer.

Nicole said the forum was eventually replaced by Accessibility Advisory Panels but she argued their representation was too narrow. She said, 'you might have Mrs Smith with a vision impairment talking about her own access needs' and while hearing that is important, having individuals that can represent the voices of the group was key to driving change (2018). Nicole said, 'otherwise you're just hearing a bunch of individuals talk about their individual problems and the council knows that' (2018). She gave the example of the Accessibility (Disability) Panel's response to the council's Outdoor Dining Policy where the panel was unable to oppose the arguments made by the local area's Chamber of Commerce who 'thought they'd lose money' by not allowing it to go ahead (2018). The policy allowed for cafes and restaurants to set up on the pavement. Nicole said the change of policy had a major impact for sight impaired people who use the building line to walk safely (Nicole, 2018). She said the panel was unable to oppose the policy because it was made up of people inexperienced at representing their communities and making a case to the council (2018). Nicole argued they 'were not strong enough' (Nicole, 2018). Advisory panels were an efficient way for the council to obtain fast feedback from their diverse clients with lived experience to fulfil compliance legislation but they were limited to the views and experiences of their members.

Active client Huan managed two community grants to run a Laughter and Tai Chi workshop to engage local Chinese senior citizens whom the council found hard to access. The workshops gave attendees the opportunity to 'share experiences of arrival in a new country and ways to support each other' in an environment where culture was shared and 'trusting relationships' developed (Huan, 2017). Relationships with people with lived experience helped the council develop policies to better engage with

them. But although Council funded these community activities, they did not necessarily result in relationships with Council that would enable clients to engage directly. Norms of culture were not shared and Metro Council misunderstood why.

Michelle and Huan had different access experiences even though they were both actively involved in their communities. Michelle fared better because her access needs were recognised and she said she was 'really happy with the access they offered her' (2017), whereas Huan's access needs were misunderstood. She said, 'no one is listening' (2017). Council staff were unaware that Huan lacked an understanding of how to engage because the organisation did not realise she was operating to address her needs and the needs of her group. She was excluded by their norms of practice. The only process she had access to was the one offered by Metro Council to showcase their celebration of multiculturalism. Mainstream events such as the Lord Mayor's Access Forum were inaccessible for Huan. Access was available for clients who shared norms of practice but not necessarily available or known about for diverse clients.

Latent clients Hui-Ru and Rod were both users of Metro Council services but unaware they could engage with them further. Hui-Ru came across the bilingual children's library sessions herself because she was looking for an activity for her children. She subsequently found out council had a newsletter to promote it and 'all community activities about parenting' but she was unaware of it until she started attending the group (Hui-Ru, 2018). The information was not promoted to her nor was it translated so she could more easily read it. Hui-Ru shared information via word of mouth with parents with whom she shared culture and language and that was sufficient for her needs but it was a missed opportunity for Metro Council.

Cultural norms not shared affected access for NESB clients Huan and Angela. Both described excellent trusting relationships with their community but ineffective engagement with the council. Huan was disappointed when senior members of the council failed to attend the workshops she ran. She expected acknowledgement of her work as a grant holder and senior member of her community but this cultural norm was not shared (Huan, 2017). Angela met regularly with the community she shared

culture with but she was unwilling to engage with Metro Council because she misunderstood an offer by Metro Council to help her put on a children's Christmas party (2017). Metro council encouraged her to apply for a grant to stage the event but she did not have the skills to apply, a fact the organisation was unaware of. Angela said, 'trust was important for engagement' and she did not trust the council staff because 'they reject me' (2017). Angela found the relationship unsatisfactory. She said Metro Council always ask her 'to help them and they never helped me' (2017). Hui-Ru and Rod similarly had never knowingly been offered engagement with Metro Council but both mentioned shared culture as essential for engagement. Rod saw the benefit of engaging but he said worldviews differ and it takes time to build trust (2018), but Hui-Ru was unaware the council wanted to engage with her. She found a connection through a WeChat group of people she shared culture with (Hui-Ru, 2017). Engagement was improved by shared norms of practice but misunderstandings often occurred with NESB clients because their norms of culture differed.

The active, aware and latent NESB clients, Huan, Angela, Hui-Ru and disability client, Rod, described feeling engaged with people they shared culture with but estranged from Metro Council (2017,2018). On the other hand, disability clients, Michelle and Nicole were connected because the council acknowledged their access needs and provided variations in line with compliance legislation. Disability and NESB clients Nicole and Hui-Ru had sufficient knowledge, skills and attitude to engage with the council: they not only had a goal, they also had the capacity to achieve it.

For clients to engage with an organisation, they need to have access to describe the variations to standard processes that they require. Trusting relationships with people with lived experience who share cultural norms increased the organisation and its clients' ability to understand one another because they could listen and give feedback that was understood. Listening alone, however, was not enough. Clients needed to be heard and systems adjusted to accommodate and address access needs and differences in expectations that was identified as a barrier for many diverse clients. A process to address the communication gap created when the organisation's norms of

practice do not acknowledge their diverse publics norms of culture is needed to avoid a situation where engagement for diverse clients is assumed but not achieved.

Opportunities to provide feedback for inclusion

Clients described being included when their access needs were addressed because they could give feedback to request a variation of process or product and the contact enabled them to become part of the loop to receive information.

Michelle was able to give feedback as part of the Accessibility (Disability) Advisory Panel because her access needs were addressed and she felt valued because her input was acknowledged in all their materials. Huan was recognised for performances she staged at the annual Harmony Day Festival to celebrate multiculturalism but otherwise, she felt ignored. Nicole gave feedback directly to staff she had relationships with and on consultations that were signalled by a dedicated liaison officer as needing feedback. Despite this, she found 'the [council] won't really give you any effective way to influence the outcome' of a decision, as she found when putting forward her community's position on the Outdoor Dining Policy (2018). Nicole said, 'Councillors wanted to get the policy up as it was because they were convinced any variation would ruin their business' (2018). She said, 'people with disability needed a variation for safety and their needs should have been taken into account' (Nicole, 2018). Nicole argued they should have been the priority but 'we failed' because 'we need to be included at the beginning' (Nicole, 2018). The timing of consultations to allow for feedback to inform processes was an issue raised a number of times and may have occurred because norms of culture were not shared and they covertly affected understanding.

Similarly, Angela was asked for feedback but her capacity to provide it was limited by the council's reliance on written processes, which Angela was excluded from because she was unable to read. Metro Council was unaware that she was unable to engage because the organisation did not ask her what she needed to be included. Consequently, Angela found the council self-serving. Hui Ru and Rod were never asked for feedback because their connections were unknown to Metro Council. These clients

had the potential to provide the council with insight about how to reach similar latent clients that the organisation struggled to engage with but the opportunity was missed. Hui-Ru was a client of the council in an area where Alice said they wanted to improve engagement but their BBQs and door knocking did not engage, and Rod's organisation could offer mutual benefits for their ATSI Advisory Panel. Latent clients were not on the council's radar because the organisation's communication strategy did not extend to them. It would be unrealistic to expect Metro Council to engage with everyone but these publics were identified as important and yet connections were unexplored.

Clients' relationships were strengthened when feedback was requested and input acknowledged, however, Nicole felt the process fell short. She was asked to contribute to panels and her work was acknowledged in reports, (the New Year's Eve fireworks team 'send you a thank you letter', to acknowledge your work) but she was disappointed she was never remunerated beyond a stipend to cover travel costs (Nicole, 2018). Nicole found the double standard unacceptable, given that the council has a host of consultants it pays 'big bucks' to (2018). She said the council expects people with a disability to do it for nothing (2018). Nicole was disappointed her 'input was valued but not valued enough to cover the time invested' emphasising the importance of valuing input from people with disability (2018).

A communication strategy to go beyond addressing the access needs of actively engaged clients has been identified as is essential to break traditional cycles for a government organisation charged with ensuring inclusion for all.

Discussion

Inclusion rather than Compliance?

Metro Council is a large organisation, with rigid compliance processes to meet the legislated requirements of the Disability Discrimination Act (1992), Disability Inclusion Act (2014), and Racial Discrimination Act (1975). It has many diverse publics to engage with. This leads to a complex communication environment, with multiple documents and communication processes to include its diverse clients. To measure success in

meeting its objectives, Metro Council adopted the Australian Human Rights Commission's (AHRC) approach, measuring inclusion by counting success against positive actions, such as increased engagement with minorities rather than counting the number of complaints responded to (AHRC, 2019). In this way, Metro Council has been able to shift its focus away from compliance for the sake of compliance to an emphasis on positive actions for change and the inclusion of diverse publics.

A compliance framework suggests the organisation is serious about inclusion but some scholars argue it can represent a 'tick the box' mentality, as Bree noted (Bree, 2017), if 'shared dialogue' is not achieved for disabled people (Thill, 2015, p.13). Having policies that comply with appropriate legislation is no guarantee that the needs and expectations of diverse publics will be met (Davis, 2006, Vardeman-Winter, 2014), as Bree experienced when delivering what she thought was an accessible variation of the fireworks event, only to find it was inadequate because it did not meet the expectations of the diverse clients (2017). Feedback from people with lived experience improved her capacity to deliver accessible communication.

The Findings show that clients who identified with disability had a greater chance of having their access improved because a compliance framework aimed to include them and an implementation plan to accompany the Accessibility Disability Inclusion Plan guided access and engagement. The value of a formal process only served to highlight the missed opportunities of the lack of a compliance framework, a Cultural Diversity Policy and implementation plan offered to NESB clients. The terms of the organisation 'shape what is taken for granted' according to Ahmed, (2012, p.61) and guide communication processes that privilege known processes. As a result, clients who do not fit a known process are excluded and the organisation is unaware of the consequences of the decision to provide services in that way (Woodhams and Corby 2007).

Structural Barriers to Inclusion

'A culture of inclusion doesn't just happen', according to the Diversity Council of Australia, 'it needs a kick start' by embedding processes into current systems (2015,

p.31). The Findings show that there were several structural factors that hindered Metro Council's efforts to provide services and products to diverse minority publics. Significant among these were the constraints that impact on a government body. A factor unique to government, is that the politics of the day can sway its focus and vary opportunities to connect with people who have less power in the debate (Canel and Sanders, 2012, p.85). That factor was evident in this case study. The Multicultural Advisory Panel had been dissolved following a government initiative to avoid discrimination by separating CALD clients out for attention (Australian Human Rights Commission, 2019). The introduction of a more cohesive process may avoid segregation but it represents an opportunity cost for excluded CALD publics, masking their needs (Ahmed, 2012, Davis, 2006, 2013, Bickford, 1996, Jakubowicz, 2011). This change in approach also contravened the Australian Human Rights Commission Action Plan's aim 'to foster a sense of belonging, ownership of solutions and empowerment to improve individual and communal wellbeing' (AHRC, 2013 p. 4).

The Multicultural Advisory Panel was replaced by issues-based communication, signalling a change in Council's priorities and aligning resourcing and funding to meet the organisation's goals, objectives and compliance criteria. Lukes argues that giving undue prominence to selected issues privileges the more powerful and better aligned (1978, p.21). Consequently, diverse minority publics whose issues are less clearly understood can be side-lined.

Communicating with clients not already engaged was only considered for specific targeted programs, even though inclusion was a compliance condition across all the council's activities related to the *LGA, 1992, DDA, 1993* and *DIA, 2014*. The change, back in 2012, was a significant one as it left CALD clients who were not associated with one of the council's five 'issues' of focus without a way to engage with the Council. An 'issues focus' alone has been identified as a major barrier for communities to engage with organisations (Vardeman-Winter, 2011, Davis, 2013, Wadiwel and Cooper, 2013).

A second factor is that government organisations can be limited by funding and affected by prioritisation (Hallahan et.al 2007, p.3), as Bree found when unable to

engage the services of the communications team to promote the variations she had developed for CALD visitors to the Fireworks event because it required a separate budget (2017). Thus, the variations of information by language were not used and she was unable to justify spending the time and money developing them. Bree said she would not go to the trouble of providing them next time, as she assumed they were not needed, but diverse clients may have been unaware they were available. It was a missed opportunity for CALD clients to have the variation they needed and for Metro Council to achieve the inclusion they had hoped. A communicative action approach to engagement failed to recognise the value of strategic action to purposely seek to engage diverse clients whose access needs can vary from the organisation's norms of practice making them harder to reach (Habermas, 1987 in Chriss, 1998). Theunissen and Rahman agree a communication process must be in place for minority publics to be heard (2011, p.18) otherwise their opportunity for access can fail.

Thirdly, government organisations have a reputation for investing in staff training and providing access to reports and statistics to improve their staff's capacity to fulfil their duties (Hastings et al., 2016). Skills training was important to managers in this study but formal training opportunities were not always taken up. The council described a commitment to compliance with the DDA 1993 and DIA 2014; however, the training needed to improve processes was voluntary. The lack of compulsory training across the organisation diluted opportunities to address the gap in knowledge and skills for many managers unaware of, or unfamiliar with, diversity. The Australian Centre of Excellence for Local Government (ACELG) found only a small percentage of funds in local government were allocated to training as a proportion of total payroll (Hastings et. al., 2016, p. 32). The voluntary approach to training suggests Metro Council placed less value on inclusion than their compliance criteria and it affected the attention to inclusion for many staff. Both the Diversity Council of Australia (DCA) and Federation of Ethnic Communities Council (FECCA) describe the value of 'leveraging workforce diversity through leadership' (DCA, 2015, p.7) to create workplaces where diverse publics are valued (AND, Access and Inclusion Index, 2018) and respected but they argue a 'culture of inclusion' (FECCA, 2019) requires a more connected approach. DCA

call for a mindset, knowledge, skills and behaviours that are identity-aware, relational, open and curious, flexible and agile and growth-focussed (DCA, 2015, p.8).

The lack of awareness and lack of familiarity with diverse clients had an impact on Metro Council's ability to provide the services and products they proudly described. Evidence from the case study showed that managers were aware that their skills varied according to their experience and contacts. Some managers based their access and engagement strategies on data collected through surveys and statistics. Others took advice from peak bodies, consultative committees and advocates who were in contact with people with lived experience. Both sources improved managers' understandings of their clients' access needs but having a relationship with a person with lived experience gave managers insight that enabled engagement. A benefit of the informal processes was that managers learnt there were other ways to offer access to services and this realisation challenged their own norms of practice. Multiple opportunities for engagement and power sharing are established when norms of practice expand to include a variety of publics (Krompridis, 2006). However, a note of caution is necessary here. Communicators categorise publics for attention based on their understanding of the needs of the public but they can be mistaken in their interpretation because the information is limited to certain norms and other ways of being are not considered (Campbell, 2009, Garland-Thompson, 2013). Reeve, for example, found assumptions that people with disability share the same experience of disability and argued that managers need to be mindful that everyone is not the same (2012, p.89).

Listening in relationships of trust and distrust

There is significant evidence in the literature that listening to diverse publics improves their access to services when their access needs are addressed (Goggin 2009, p494, Vardeman-Winter, Jiang and Tindall, 2014). Further, listening 'empowers those who are listened to', according to Thill (2015, p.9) and through relationships diverse publics can have a voice when there is a process in place for them to be heard, attended to and valued (Waller, Dreher and McCallum, 2015, p.57).

The Findings in this study demonstrate listening is complex. Diverse clients often communicated differently and expressing themselves is complex in forums where norms of practice can differ, even when they have the knowledge and skills required. The experience clients described in speaking at a public forum is consistent with Couldry's assertion that 'having a voice that counts is more than just speaking, it is about having agency to put forward your view' (2010, p.8). In this case, diverse clients felt they did not have the agency needed, for example, because of a lack of familiarity or comfort with speaking in front of a public audience.

Listening is impacted by decisions on who has the authority to speak. There was support for the Advisory Panels' capacity to provide feedback that led to improved access for multiple clients, not only for clients with disability. The effective use of Advisory Panels relies on the skill of the facilitator. This finding supports Schein (2002), who claimed that public communicators have the skills to lead communication between the organisation and its publics by operationalising the values described in their vision, mission, leadership and commitment to their publics (in Clegg, Kornberger, Pitsis, 2011, p.222). A better focus on the needs of diverse clients creates an opportunity to expand engagement in new ways (Haller and Zhang, 2014, Dreher 2012, Thill 2015).

The Findings also show that reliance on panels could minimise Metro Council staff's ability to listen to the voices of its clients, with Hannah arguing they were 'gatekeepers of feedback' (2017), with some panel members having their own agenda, not representative of the larger group (2017). This echoed Thill and Dreher's findings that a gatekeeper prevented a person with disability from putting forward her view on the feminist website Destroy the Joint (DtJ) because the content was deemed 'of no interest to the group' (2017, p.6). While the council's terms of reference claim panel members' views are independent and not representative of a group (Metro Council, Sustainable 2030 Community Strategic plan, 2017), these views are nevertheless relied on by managers for feedback on the design of policy and processes. A range of pressures are brought to bear on participants in the Advisory Panels, and the process itself is set up in such a way that it is inaccessible to anyone wanting to offer a

different view. As Davis argues, when people sit outside a norm of practice, their view can be dismissed (Davis, 2006, 2013).

Established relationships were important to identify who was listened to. Communication processes including public documents were designed in consultation with diverse publics to improve their readability, for multiple publics. These experiences matched those of Thill who found that when people participated in the design stage of the National Disability Insurance Scheme (NDIS) the outcome reflected their concerns (2015, p. 19). The variations designed were found to extend beyond the people they were intended to improve access for, for example, those that might have limited reading skills or dyslexia. They were also found to be equally effective for people from a NESB who may prefer a simpler, more accessible version of a text (ACCAN, 2018, Telstra, 2018). The Federation of Ethnic Communities Council Australia (FECCA) agreed that easy-English versions improve engagement for many of their members (Access and Equity Report 2017, p.18). Metro Council found the simplified versions of policies more popular than the regular versions and Alice said they offer this version for all policies now (2017). 'Simplifying information, not dumbing it down' was an important distinction and initiative to improve inclusion that Matthew described improved accessibility for many diverse publics (See also ACCAN, 2018, Telstra 2018, PWDA, 2018, FECCA, 2017).

Similarly, informal communication processes that were built through relationships shared with clients improved the effectiveness of the formal communication frameworks managers used (Ledingham & Bruning, 2001, p.86). Informal communication processes improved formal frameworks because the relationships helped managers to understand the exchange and understanding improved access. This Finding is in line with Ledingham & Bruning (2001) and Dreher (2009), who recommended foregrounding relationships with people with lived experience.

However, not all lived experience was accepted easily and listening to some diverse publics was problematic. Relationships of trust build skills to improve access (Ledingham and Bruning, 2001, p.86, Dossa, 2008) but trust takes time and managers

unfamiliar with engaging diverse clients can struggle to include them (Macnamara and Camit, 2017, Hage, 1993, Tan, 2003). The less powerful migrants, newcomers to the council area, were marginalised because their engagement was narrowed to the organisation's priorities, celebrations of community through performance at Harmony Day. Metro Council was not open to discussing funding to address issues of isolation important to the group. Huan requested funding for a bus so community members could attend the performance or go to the centre to participate (2017). The offer of an exchange was made but it was not supported. Migrants' concerns were sidelined by the organisation's agenda, at a time when they were encouraged to speak up and were beginning to feel empowered to ask for what they needed (Hage, 1997, p.99). The organisation's agenda reduced the offer of engagement to suit their need to showcase how they included this group rather establish authentic dialogue (Woodhams and Corby, 2007). The motive for the exchange was misunderstood by both parties because norms of culture were not shared (Kim, 2001) and both felt let down but the impact was greater for the migrants whose needs were not heard (Dreher, 2012).

For some, their lack of engagement was identified as a matter of trust on the part of this diverse public. As Hannah noted, 'newer (migrant) communities are not empowered to speak up' because they have different experiences of engaging with government (Hannah, 2017). This position is supported by the Scanlon Trust Survey (2018) and Edelman Trust Barometer (2019) to extend more broadly. They found 'government' to be one of the least trusted businesses. Public communication scholars argue that trust, reciprocity and commitment improve engagement because publics become familiar with each other and the benefits are mutually rewarding (Grunig and Huang, 2000, Andriof and Waddock, 2002, Barnes, 2012, p.8, Kent and Theunissen, 2016, p.4043). The reason for this group's lack of engagement is not clear from the data. The managers assumed it was because of distrust. Building trusting relationships is considered essential to improving engagement by empowering publics, (Vardeman-Winter, 2011, p.417). However, when culture is not shared, misunderstanding occurs (Kim, 2001, p.143). The covert power that is present in the organisation affects the potential for minorities to have their say because the more powerful are privileged and

minorities are easily misunderstood (Lukes and Bickford, 2005, p64-65). This leads to a vicious cycle: diverse clients whose communication style varies from the organisational norm can experience exclusion because the process of listening has become covert, with neither the staff nor the clients aware that misunderstandings arise (Davis, 2006, 2013 Fraser, 2008, Kim, 2002, Goggin, 2009), leaving each unable to take action that would lead to the change in organisational norms that would remedy the problem.

Listening assumes that publics use the opportunity to provide feedback. Staff expressed concern that many residents did not contribute to the council's Residents' Survey. In particular, clients with disability did not always identify themselves in this way in the survey, and their lack of feedback affected the organisation's understanding of the resourcing they needed to provide services to people with disability (Wadiwel and Cooper, 2013, p.99). This finding is echoed in many studies. For example, Vardeman-Winter, Jiang and Tindall found misunderstanding of new breast cancer screening guidelines were clarified when organisations recognised the multiple identities of their women clients (i.e. their culture, language and socioeconomic status) as cohesive or dissonant and informed the way organisations communicated with them (2014, p.227). This is important, because, as Crenshaw argued, people can align with multiple categories of disadvantage that overlap, and those at the intersections can be exponentially disadvantaged (1989).

Listening in the context of a local government authority is part of the process of decision-making. Knowing consensus has been achieved however is tricky because communication between diverse people is not equal, as this case study has shown. This point is echoed by Lukes, who agrees that not everyone has the capacity to express a position and not voicing an opinion may be a covert way of opposing a position; however, that position is not identified when power relations are not shared (1978, p.50). One reason why residents of Metro Council did not provide feedback in processes of public consultation was because of the timing, an issue raised a number of times. The norms of culture of groups of residents were not considered in the organisation's norms of practice and therefore staff were unable to facilitate effective engagement with diverse publics (cf Kim, 2002, Davis, 2006, 2013).

Conclusion

This case study investigated the ways in which Metro Council provides inclusive services to its diverse clients, who are residents of the local government area. The Findings show that, despite its strong policy statements and reputation for broadly inclusive practices, several factors prevented it from providing services to diverse clients that matched its reputation. Significant among these, as discussed above, was the tension between policies of inclusion and the influence on the ways these policies were implemented from broader political ideologies; a range of structural issues that raised barriers to inclusion; and the complexity of processes of listening in the context of these first two factors. Metro Council had a strong focus of inclusion of diverse clients in its policies, reflecting its values and going beyond a basic approach to compliance with legislated requirements; however, this was no guarantee that diverse clients would receive inclusive services. Secondly, as an agency of government, Metro Council, like all local government, was influenced by the wider political context of the society, sometimes creating a significant barrier for diverse clients to receive appropriate services. Further, the organisation placed significant emphasis on meeting the expectations and needs of the residents of the local government area, and on the need for skilled and knowledgeable staff, but it did not make staff training on issues of diversity mandatory, instead leaving staff to make informal arrangements to understand the norms of culture of groups of residents. Finally, the complexity of listening, a key aspect of strategic communication in this case study organisation, was demonstrated. Listening was shown to be affected by several factors, including who had the authority to speak and who could be heard; the importance of establishing trusting relationships between staff and members of diverse publics in developing knowledge and skills in staff as well as determining sources of lived experience to be included in program development; and the challenges of non-responses from diverse publics to calls for input and feedback, who found their norms of culture were not matched by the organisation's norms of practice, often covertly expressed in the communication processes.

Chapter 6

Loyalty and disappointment: the hidden cost of exclusion. A case study of a for-profit organisation and its diverse customers

Introduction

This is the third of three case studies examining the communication frameworks and processes that organisations apply to access, engage and include their diverse and often marginalised clients. This case study explores a national telecommunication organisation that I am calling Oz Tel, selected because of its known focus of support for its diverse customers (ACCAN, 2017). It is one of Australia's largest employers with approximately 30,000 staff serving sixteen million clients across a range of telecommunication services with a revenue of A$27.8B (Oz Tel, Annual Report, 2019). Oz Tel serves many People with Disability (PWD) and people from Non-English Speaking Backgrounds (NESB), known as Language Other Than English (LOTE) by this organisation. Their commitment is demonstrated as a signatory to the Universal Service Guarantee (USG) and Access and Inclusion Plan (AIP). The USG is a formal agreement between a telecommunication organisation and government to provide services to remote Australian communities via landlines, voice, broadband and mobile networks (communications.gov.au -universal-service-guarantee-summary-report, 2018). The USG forms part of the *Telecommunications Consumer Protection and Service Standards Act 1999 (TCPSS Act)* ensuring all Australians have access to a form of telecommunication (https://www.communications.gov.au). The focus is vulnerable and remote communities. An AIP is the formal mechanism for documenting and evaluating access and inclusion across the organisation.

This chapter analyses Oz Tel practices to identify why and how inclusion is offered and manifests for an organisation that prioritises profits. I review the organisation's offer of inclusive processes and report on managers' skills in applying them. I compare

managers' experiences with engaging their diverse customers with customers' experiences of being included. I analyse themes arising from the comparison to identify successes, challenges and gaps to investigate.

The study found that the opportunities for access and engagement with Oz Tel were hindered by organisational structures and by communication processes. Efforts to include were undermined by four key factors in the context and communication processes of the organisation. The organisational structure and consequent processes valued compliance with legislated reporting requirements over processes of inclusion.

The mismatch between the organisation's norms of practice and norms of culture of customers and staff led to misunderstandings and to exclusion from services, particularly of LOTE customers. The shift in market orientation of the organisation, to a profit-making enterprise, led to a significant imbalance in power between the organisation and its diverse customers.

Oz Tel's strategic communication approach

The roll out of the National Broadband Network (NBN) impacted all telecommunications companies in Australian over the period of this study. Oz Tel's operations were guided by a strategic plan that was underpinned by four pillars to "work better together" and consolidate their position in an increasingly competitive environment as the NBN was rolled out (Corporate Strategy, 2018 p. 1-2). The new strategic plan aimed to reduce the number of permanent staff and products and services offered over four years to ensure competitiveness (Oz Tel, Four strategic pillars, 2019 Annual Report, p.10). Oz Tel planned to do this by changing its offering across products and digital experiences, establishing a separate infrastructure to operate post-NBN, simplifying internal structures and creating a portfolio management process (Oz Tel 22, 2018 p10). The $3 billion investment program set deliverables across customer, business, network, employee, and productivity environments to ensure it thrived (2018, Oz Tel Annual Report p.10). Oz Tel claimed that the radically simplified organisational structure would improve customer service and reduce costs by empowering staff and moving to new digital platforms on the next generation

network (Oz Tel, Our Corporate Strategy p1, 2019). The change was part of Oz Tel's
long term plan to downsize, reducing product offerings from 1,800 to 20. The CEO
described the change as "ensuring our continued success … while staying true to our
purpose and core values" (Oz Tel (a) Annual Report, 2019, p.7). Incentives to maintain
brand loyalty were to be offered by improved flexibility and rewarding customers in a
points system that contributed towards the latest device (Oz Tel, Annual Return 2019,
p.6).

Figure 6.1 Oz Tel Strategic plan OTXX 2018-2022

OTXX

Strategic pillars	Radically simplify our product offerings, eliminate customer pain points and create all digital experiences	Establish a standalone infrastructure business unit to drive performance and set up optionality post the nbn rollout	Greatly simplify our structure and ways of working to empower our people and serve our customers	Industry leading cost reduction program and portfolio management	
Enabled by our up to $3bn Investment program	New digital platforms				
	Australia's largest, fastest, safest, smartest and most reliable next generation network				
Delivering	Market leading customer experience	Simplified products, business and operating model	Extended network superiority and 5G leadership.	Achieve Global High Performance Norm in employee engagement	Net cost productivity of $2.5bn by FY22	Post-nbn ROIC > 10%[1]

1   Post-nbn defined as FY23 and beyond on AASB16 basis

The shift to a for-profit orientation in this environment was evident in the objectives of
increasing productivity and monetising assets to strengthen the balance sheet. Among
the changes made to the organisation were a new organisational structure and
leadership team, a reduction in the number of plans available to customers, the
migration of fifty percent of customers to new technology, establishing a standalone
infrastructure from government support, and elimination of the need for one third of
customer calls within two years.

The importance of inclusion is expressed in the organisation's vision and mission through brand statements, "to create a brilliant, connected future for everyone" with a vision to be, "a world class technology company that empowers people to connect" through branding, "to create ways to empower everyone to thrive in a connected world" (Oz Tel Annual Report, 2018p. 2). Oz Tel's advertising wants people to never think 'I have no choice' and always feel connected (CGR 2019 p.15). The delivery process is governed by standards and success is marked against deliverables that value equity of service, according to the Sustainability Report (2019 p.16).

Oz Tel's formal communication processes incorporate a mix of internal and external documents and processes to guide engagement and share information within and outside the organisation.

Processes are also adapted to improve access for the organisation's diverse publics who are harder to engage with because their communication style is different. Oz Tel is a large and complex organisation in transition and it operates to maximise engagement with diverse publics in line with their commitment guided by the externally regulated USG (www.communications.gov.au). Oz Tel also have their own internal Access and Inclusion Plans to guide them. The set up attracts many of the four million Australian people who identify with disability (Oz Tel, 2020/ aboutus/community-environment/community-programs/disability) because of the accessible services offered. They also serve many customers from LOTE backgrounds because they design products for certain international markets. The disability and LOTE communities represent a large and growing percentage of Oz Tel's Australian business.

Oz Tel Documents

Oz Tel's documentation includes policies, action plans and information on protocols. The organisation aims to maximise sales by engaging more effectively with their

current and potential customers to align with their goals and objectives to innovate for success.

A review of Oz Tel's policies for people with disability demonstrates changes in their offering and reporting processes. The transition from an organisation with a focus on equal access for all customers to a for-profit organisation that aimed to balance access with a sales focussed agenda changed their reporting structure and goals (Oz Tel, 1997). Policy changes also reflect community attitudes to inclusion and innovation that align with the Disability Discrimination Act 1992, The Disability Inclusion Act, 2014 and Universal Service Guarantee (USG) (2018).

Similarly, Oz Tel has made changes to its LOTE policies to meet the needs of particular markets through specific product and service offerings that are communicated via personal contact at multicultural hubs or via translations online and on request.

Three documents combine to form the organisation's key engagement and reporting processes to their shareholders and stakeholders (Annual Report 2019, p.2). They are the Annual Report, Corporate Governance Statement and the Sustainability Report (Oz Tel, Annual Report, 2019). The Annual Report outlines financial performance and remuneration against material risks. The Corporate Governance Statement details accountability processes to protect and enhance the interests of shareholders and stakeholders aligning with the Australian Stock Exchange (ASX) guidelines and standards of behaviour (CGS, 2019, p. 2). It incorporates an accountability framework that reflects Oz Tel's values and goals of open, clear and timely communication with shareholders; engaging a skilled, experienced, diverse and independent Board; with clear delegation, decision making and accountability frameworks and systems for risk management and assurance; and a policy framework developed to guide working together to deliver the strategy (CGS, 2019, p.2). The framework guides engagement with customers and aligns action with their code of conduct and key governance policies to "ensure diverse customers have the capacity to be heard by empowering engagement" (CGS, 2019, p.3). By engaging a diversity of people, the organisation improves their capacity to attract a range of talented people and establish a reputation

as an inclusive employer (p.18). Current diversity targets are focussed on expanding the number of women on the board, in management roles, in graduate intakes and as recognised through gender equity programs (p.19, 20). The CGS also aims to increase the number of candidates from diverse backgrounds applying for positions by establishing quotas for people who identify with disability and Indigenous Australians (2018 p.21). An ongoing participation in the Australian Network on Disability Stepping into Internship program for university students and achieving 10% of hires with disability in 2019 demonstrate their commitment to grow this engagement (p.21).

The Sustainability Report takes an in depth look at performance in relation to material, social and environmental initiatives to create opportunities to innovate (Oz Tel Annual Report, 2018, p.2).

Opportunities for efficient and effective ways the business can build collaborative processes to create a better and more inclusive future are sought out. Oz Tel's diverse customers and employees are described as an asset that the organisation collaborates with to create innovative design, using a digital futures approach and an environmental focus to support 'a diverse and inclusive workforce'. They do so by expanding current programs such as 'Tech4good' with specific support services such as digital literacy programs for diverse customers. Other supports via Oz Tel's 'vulnerable communities' program aim to assist people with disability who have become isolated and vulnerable because their access needs are harder to manage. The organisation recognises the "value of employees' unique perspectives to drive innovation in business strategy" and consequently, employ a diverse workforce to service the same customers (2019 Sustainability Report, p.32). The CEO described the increased number of diverse staff as "intentional… to achieve a better outcome" (Oz Tel, Annual Report a, 2018). The same staff advise Oz Tel on programs such as digital start-ups, Tech4Good and Remarkable, all designed to build new markets through improved engagement with people with diverse needs. The process aims to be collaborative and as a result offers an inclusive path for diverse customers.

The Accessibility and Inclusion Plan (AIP) operationalises action under the Sustainability Report to guide engagement with diverse publics. The protocols outlined in the AIP guide the organisation to develop communication processes "to work better together" aligning with the United Nations Global Compact to the UN Convention on the Rights of Persons with Disability (Oz Tel, Community and Environment, Accessibility Inclusion Plan 2017-2019, Corporate Strategy, p 1-2, 2018, Convention of the Rights of Persons with Disability, 2006). The AIP is proudly acknowledged by staff and customers as an outward sign of Oz Tel's commitment to inclusion as one of the first for-profit organisations to register with the Australian Human Rights Commission (AHRC) in 1996 (Emma, 2018). In 2016 the name changed from Disability Action Plan (DAP) to Access and Inclusion Plan (AIP), recognising a societal shift from 'disability' to 'accessibility' and its remit expanded to include people with disability, the elderly, young parents and people from culturally and linguistically diverse backgrounds (AIP, PWC, 2018, p.7). The change of focus extended possibilities to connect that went beyond a disability focus. For example, the 'SMART home' telephone application is one example of a product designed to support people with a specific disability to live independently by creating a device that gave them control of appliances such as lights, stove and heating systems using their own telephone. The accessibility offered quickly gained popularity with many other people who had difficulty reaching light switches or turning on devices, including older people living alone and people with short term physical injuries. The change of focus from a disability solution to accessibility of the product improved engagement for many and is one example of many solutions developed that extended access to multiple publics.

These documents create a backbone to report progress between Oz Tel and their stakeholders and shareholders to achieve the organisation's goals.

The next section includes further discussion of how these documents are applied and only relates to processes concerning diverse clients' access and engagement opportunities.

Oz Tel's protocols as outlined in the organisation's policies and procedures guided managers' establishment of communication processes to engage with their diverse stakeholders and shareholders. Three specialist managers of sustainability, accessibility and LOTE customer engagement, initiated communication. They were supported by the organisation's Diversity Council, comprising leaders from all their business units including the CEO (AIP, 2018, p.3). The managers applied engagement processes according to their own experience and skills working with diverse publics. Of the three specialist managers responsible for engaging diverse customers, one had lived experience of diversity and because of this they had personal and professional contacts to take advice from. The other two managers were passionate advocates, but their engagement was guided by specialist staff and champions who held relationships with diverse customers to provide feedback.

Oz Tel's key communication process to increase engagement for diverse publics was their Access and Inclusion Plan (AIP) and it focussed on three pillars: to improve customer experience, create an inclusive workforce and innovate for the future (p.41).

The first pillar was designed to improve digital access, and this was achieved by updating Oz Tel branding guidelines to ensure the colour, logos and typography were in line with best practice standards for accessibility. The initial focus was improving access for people with vision and processing impairments, but the simplified approach was found to help many more, including LOTE customers with minimal English language. The second pillar engaged strategies to develop an inclusive workforce that was supported and endorsed by the Australian Network on Disability (AND) to provide training to better include people with disability in the workplace. Oz Tel works with AND to manage employment interviews and make recommendations on workplace variations such as office furniture and computer software readers to reduce barriers for staff to complete their work (Oz Tel, Our commitment to disability employment, website 2020). The organisation aims to increase the number of graduate hires who identify as living with a disability by 10% annually and increase participation in access

and inclusion training for more than 1200 employees. Five hundred people with disability are employed as part of the Federally funded Australian Disability Enterprise program (ADE) to work with industry to provide training to staff with a disability (ADE, 2019). Oz Tel pride themselves on being a 'disability confident recruiter' (AND, 2020), according to the CEO (2018).

The final pillar aims to create an environment for innovative solutions to be developed through supported partnerships from Oz Tel Foundation's support of the Tech4Good Challenge and Remarkable accelerator, both competitive programs that encourage and support innovators to design digital solutions to social challenges. Oz Tel supports both programs by providing mentors and technical experts to assist projects with the greatest merit to develop their ideas. For example, the 'Appsforall' website came out of the Tech4Good Challenge, and it was developed with Transpire to guide programmers in how to make telephone applications accessible (2019, Sustainability Report p.41). The Tech4Good initiative joined with Expression Australia, the Royal Institute for Deaf and Blind, and Vision Australia to create an App to translate signs, sentences and greetings into Auslan to help non-deaf people communicate with deaf people. (p.48). The App improved awareness and provided users with information about how to connect in new ways. These programs sit with Oz Tel's philanthropic arm to innovate and improve access to technology across sectors of vulnerable people they have determined struggle for inclusion, including people with disability, seniors, homeless people and people suffering abuse (Oz Tel, Foundation, 2019).

The AIP ensures Oz Tel has the skills to be at the forefront of inclusion through reviewing access and learning from partnerships and inspiring management to improve access because they have a framework to engage with their diverse customers.

The organisation has established a number of communication processes to support access for customers with disability, including a "Disability Enquiry Hotline" that can be accessed using alternative engagement formats including voice, email or Tele-typewriters (TTY), and verbal content converted to text for deaf people. The variations

of process provide information to activate accessible features on technical devices such as mobile phones. Sixteen thousand calls were registered as received and three thousand five hundred successful applications submitted for products to improve access as part of the organisation's Disability Equipment Program (2019 Sustainability Report p.41). The variations requested included: one hundred and eighteen Tele-typewriters (TTY), an increase on 2018. Seventy thousand calls to the Directory Assistance Helpline to provide access assistance to people with disability to national directory information, a free service for the ten thousand registered customers unable to use telephone directories in 2018 (2019, p.41). Success was mapped against deliverables in the Corporate Governance Statement and the organisation noted only four disability discrimination complaints were lodged from the Australian Human Rights Commission over the 12 month period. The importance of mapping success and describing challenges was noted by the CEO and Chair to improve processes and identify gaps. Oz Tel argues the processes they follow emphasise the benefits of a two-way dialogue to listen and understand multiple perspectives (CGS 2019, p.4).

The communication processes for Oz Tel's largest minority, Language Other than English (LOTE) customers, only reported people who were identified in another category they deemed diverse. This included people in a remote location, seniors, women, Aboriginal people, or people with disability (Sustainability Report, 2019, p.32). Simply being from a LOTE background alone was not viewed as warranting separate reporting. Oz Tel's approach to inclusion of their LOTE customers was deliberately bolstered by having a workforce of people who represented the local communities where they operated (Alex, 2018 & CGS, 2019, p. 18). LOTE staff were encouraged to use their language and cultural skills in the workplace to speak with customers in one of Oz Tel's sixty-five multicultural stores or provide feedback on communication information designed for LOTE customers in the development stages to ensure the content was culturally appropriate. An 1800 number was available for customers to nominate to speak to an interpreter in their language to receive support on products and services (Oz Tel, Multilingual services, 2020)

Successful engagement with LOTE customers is measured against objectives that report on "business results, enhanced reputation and the attraction of diverse employees," according to Oz Tel's Employee Diversity and Inclusion Policy (2020).

The organisation deliberately employs communication processes to engage a diverse workforce that they argue is "essential for creating innovation" (CGS, p.18, 2019). The CGS code of conduct and governance policies guide managers to work towards being free of discrimination, bullying and harassment (p.16 CGS). Oz Tel's strategy to increase the diversity of staff includes: internships for university students with disability; support for leaders to adapt to workplace processes to include people with disability and their carers; recruitment of LOTE staff especially in areas designated multicultural hubs (access 2020, from 6th Disability Action Plan, 2013-2019). Oz Tel argues that such strategies improve their application of their Accessibility and Inclusion Plan (AIP) and Corporate Governance Report guidelines.

Feedback processes across multiple touch points at the individual consumer, small business, large enterprises and government organisation level is gathered by survey, market research and focus groups to count product sales (Sustainability Report, 2018). In addition, feedback is collected from industry groups, networks and forums of staff who manage diverse customer contact at meetings and events, AGMs, by email and online via webcasting to understand their customers' needs (Sustainability Report, b 2019, Annual Report, 2019). The feedback process aimed to help Oz Tel "identify concerns before the AGM and develop responses to the most important questions in the meeting" (Sustainability Report, 2018). In this instance, feedback built stakeholder trust by "being responsive and accountable" and Oz Tel measured contact at every customer touch point using a Global Reporting Initiative (GRI) and Reporting standards and principles that were in operation since 2008 to understand the market (2019, Sustainability Report, b Community and environment). Feedback improves engagement with engaged customers and to understand their presence in the market (Edelman Trust Barometer, 2019).

The next section introduces Oz Tel managers and reports on the themes that arose from interviews to describe their experience engaging with their diverse customers. This section is followed by diverse customers' experience of being included.

Staff and their experiences of offering inclusion

Three Oz Tel managers were interviewed, and their experience of access and engagement is described.

Managers and their reporting structure

Of the managers interviewed, two reported to the Legal and Corporate Affairs Head and this portfolio extended across the entire organisation, and one manager reported to the Consumer and Small Business Group Head and the focus was on the retail aspects of the business.

Table 6.1 List of managers interviewed and their roles and reporting area

Note: all names are pseudonyms

Interviewee	Role	Reporting area
William	Manager, Corporate and Wholesale Communications	Legal and Corporate Affairs
Emma	Manager, Accessibility & Inclusion & Digital – internal/external focus	Legal and Corporate Affairs
Alex	Manager Transforming the customer experience	Consumer and Small Business group

Below is a description of each manager's role, link to the organisation's overall strategic direction and their personal commitment to the role, as expressed in the interview.

William manages communication within the Corporate and Wholesale Communications section as part of their sustainability section within the Legal and Corporate Affairs division. He leads a team that develops communication across finance, regulatory, legal and sustainability parts of the business. The organisation's Accessibility and Inclusion (AIP) program sits within the sustainability section and William's team works with the AIP to curate accessible communication messaging and processes. William described Oz Tel's business as focussed on creating equal access and creating a sustainable and successful business. William did not disclose his cultural background nor whether he had disability.

Emma is the manager of the Accessibility and Inclusion program and responsible for digital inclusion across Oz Tel. Her program sits with the sustainability team of the Legal and Corporate Affairs division. Emma's focus is engaging with people with disability to provide accessible services to 'meet their needs rather than address a disability'. The approach exemplifies the Australian Human Rights Commission (AHRC) agenda of improved access to shift responsibility away from the person needing to make an adjustment, to the organisation enabling access (AND, 2020). The move proactively draws attention to the *Disability Discrimination Act 1992* (DDA) to encourage organisations to go beyond compliance and create inclusive accessible practices and environments (AND, 2020). Her role also promotes the Universal Service Guarantee (USG) to remote and disadvantaged communities demonstrating adherence to the DDA (1992). She aims to identify new technologies and processes that improve inclusion, that are achieved by building relationships across the business with managers, customers and communities. Emma manages the digital inclusion team and it includes a focus on vulnerable communities across indigenous and older Australians, people impacted by domestic violence and other minorities. Emma did not reveal her heritage, but she said she was blind. She described a drive to improve inclusion for all

of the organisation's publics and support people who have ideas to build skills and share opportunities to improve access processes (2018).

Alex sits with the LOTE strategy team as Manager Transforming the customer experience. Her team is part of the Consumer and Small Business division with a focus on sales. A particular focus is developing the LOTE market (William, 2018). Alex designs engagement strategies to improve access for LOTE customers and she works to sell the process to the broader business by encouraging buy-in from staff to initiate engagement. Her work aligns with marketing strategies to promote engagement to all customers by engaging employees through digital assets (Alex, 2018). Alex is from a European/Australian background; she did not disclose whether she identified with disability. She described a passion for building customer loyalty and market share (Alex, 2018).

The managers were selected by a snowball process after referral by the first interviewee, Manager of Corporate and Wholesale. Each manager was selected because they work with the diverse customers named in this study. Emma is more involved with customers with disability and Alex works with LOTE customers. The managers' and customers' experience of engagement and inclusion are described according to themes arising from the interview data about their access and engagement experience and whether they were included, by using their own words (Fink, 2010).

Managers' experience engaging their diverse customers

The three managers interviewed applied the organisation's policies to access and engage with their diverse customers according to their awareness of the organisation's processes and their experience engaging with diverse publics. Two overarching themes arose: mechanisms for inclusion and challenges preventing access and engagement. These themes are compared with diverse customers' experience of access and engagement and are followed by a discussion about their experience of being included.

Mechanisms for inclusion

The specialist managers interviewed were passionate about improving engagement for their diverse customers. They measured success against Oz Tel's strategic goals and objectives according to their business division. These goals and objectives informed processes and attracted resourcing according to the progress made. For example, William ensured all messaging was accessible and consistently reflected Oz Tel's inclusion and sustainability policy that was measured against the business division's goals and objectives. Emma focussed on access and inclusion against goals and objectives to increase sales and improve access to digital communication with a focus on people with disability. Both William and Emma reported to the Legal and Corporate Affairs division and goals and objectives were measured according to both Oz Tel's Access and Inclusion Plan (AIP) criteria and sales targets. Meanwhile, Alex aimed to increase engagement with LOTE customers, and her goals and objectives focussed on increased sales aligning with the Consumer and Small Business division marketing goals. The organisation's goals and objectives directed communication processes according to each division, and progress was reported and adjusted as required to meet the goals.

Managers proudly explained Oz Tel's commitment to inclusion for diverse customers. William emphasised the organisation's long history of supporting diverse and vulnerable customers, apparent through the development of formal policies and processes (William, 2018). He said this was further demonstrated by Oz Tel's status as a signatory to the Universal Service Guarantee (USG), to provide access for remote and vulnerable customers, and as one of the first for-profit organisations to implement Disability Action Planning (DAP) (William, 2018). The DAP was renamed as 'Accessibility and Inclusion Planning (AIP)' after a change from the *Disability Services Act, 1993* to provide a service, to the *Disability Inclusion Act 2014* taking a human rights approach to inclusion (Sax Institute DIP Review 2019, p.12). It has created a conscious change to operations that extends beyond 'naming', according to William, to "influence everything we do" (2018). Emma described the action of simplifying information to improve access for a person with disability, one that provided access to multiple

customers including people from a LOTE background or seniors or children, because it was clearer and easier to read (Emma, 2018). She said, "they were designing for a 'need' not a disability" (Emma, 2018). The change in nomenclature recognised 'the action' and moved the focus to improved access for all. Emma described empowering staff firstly by improving awareness of how variations could be developed because "staff don't know… they are alienating others" and giving them advice on how to do it "incrementally, not having to complete a full-scale redesign" (Emma, 2018). She found "a lot of people are onboard but are unsure how to implement changes" and saw the organisation getting better at addressing preconceptions by "engaging in more inclusion talk" (Emma, 2018), that is changing the rhetoric of the organisation.

Employees played an important role sharing information with colleagues and customers about variations and where to find them. Information was formally shared by specialist managers and referring customers to online resources and instore staff, and informally by staff champions and advocates because of the connections they held. Alex and Emma said their customer-facing colleagues contributed to a type of "think tank" to find better ways to engage with their diverse customers because of their established relationships (Emma, Alex, 2018). Likewise, staff from a LOTE background helped Alex develop more effective communication for these customers because they gave feedback on content like commenting on whether a translation, "read correctly, or if it would be clear to my mum" (2018). She found staff were comfortable working with LOTE customers because many staff were from a multicultural background and the context was very "relatable" (Alex, 2018). She saw the contribution of multicultural staff "as a strength of the organisation" (Alex, 2018). Likewise, Emma found staff advocates with lived experience of disability helped them connect, but staff who were unfamiliar struggled. She argued it was because people with disability are "seen as extreme and people do not consider someone who wears glasses" as having disability (Emma, 2018). Emma said, "we can put all the polices, standards and requirements in place but without the general employee population feeling it is the right thing to do, it doesn't matter" (2018). Emma argued sharing information among staff was essential to supporting goals of inclusion.

Oz Tel's policy of using access and inclusion language in all internal and outgoing information aims "to consistently articulate our position", as directed by the strategy team and implemented by the communication team (William, 2018). William saw it "as a small change but a big shift" to move from disability planning to accessibility and inclusion (2018). Advice on correct phrasing in speeches and external engagement directives to internal presentations and media are reviewed with external communication to ensure consistency of messaging. William aimed to ensure staff embed the language in all materials, but he was cognisant that they are a large company and "people can be drawn in different directions." Nevertheless, they aim to reinforce messaging in all their regular promotion (2018).

Oz Tel has 250 stores and 65 specialist stores for LOTE customers to speak with a multilingual consultant in their language. (Alex, 2018). The location of stores, the languages of staff in each store and the time they are in store is available for customers to book online for a consultation (Alex, 2018). Additionally, customers from their main nine language groups can telephone a call centre or translation service to speak with someone in their language and Alex said she was proud to be one of "only a few companies to offer the service" (2018). She said an excess of "30,000 calls a month demonstrated just how successful the [call centres] were" (Alex, 2018).

Oz Tel's English language policy was described by Alex as "inclusive of language not exclusive," and she said that meant, "we communicate in English and customers can request information in another language" by going online (2018). Thus English was positioned as the universal language for access, with translations available on request. The exception was that parts of the website were already translated into Chinese and publicly available but "there is a button to click for an English version" (Alex, 2018). Alex said it was because "Chinese people will only engage in their language" and they were an important market to expand (2018). Staff saw they had offered an "inclusive language" policy as a pathway that improved engagement. Customers are directed to the website as Oz Tel's preferred contact point because it is "always available and always on", according to William, and all the other services are listed there (2018).

Information on services for people with disability is provided via disability specific pages on the website, through the call centre and through specialist access services including a product information hotline and TTY, a telecommunication service for deaf people. The services are promoted via an online newsletter and people can sign up via the website. The newsletter is specifically designed to showcase Oz Tel's latest devices and services by and for people with disability. Emma said it was very effective because "it featured the people who use the products describing how they work for their access needs" (2018). Emma found the process so much better than "pure advertising" because information was shared by the people who used it with their friends and they could request different formats to meet their access needs including "an audio, PDF or braille version, in line with their AIP and USG commitment" (Emma, 2018). Formal engagement processes empowered managers to connect with their diverse customers and having lived experience of diversity improved engagement. The information was available, and accessible, for the customers they intended to engage with because they had collaborated and shared information to meet their needs. Emma described a pivotal moment when conducting awareness training for Oz Tel's top 230 executives who engaged in an immersion experience that allowed them to experience disability first-hand. She said the experience was life changing and it motivated them to change their product development process and include "accessibility and inclusion as an enterprise design principal requirement" before going to market (Emma, 2018). Emma described it as, "a moment of recognition that changed the way we do things" and she was thrilled (2018).

Feedback from formal relationships with advocacy groups representing people with lived experience of diversity helped the organisation identify issues and design solutions that improved engagement. For example, the two-step authentication process to verify identity by sending a code to a mobile phone, was taken up by many organisations but it was completely inaccessible for people with low vision (Emma, 2018). Blind Citizens Australia raised it and Emma worked with them to identify the issues and lobby for a change to the system. The glitch would never have been identified had the community not shared that information, according to Emma (2018). The relationship then allowed them to work together to find a solution, and the

community circulated the information amongst themselves because they knew how best to connect with their members (Emma, 2018). A formal relationship with advocacy groups was mutually beneficial because it allowed them to build relationships of trust that served them both by collaborating and designing effective access (Emma, 2018). However, only certain advocacy groups were connected, and Emma said logistically they struggled "to accommodate individual feedback" so developing relationships with individuals could be hard (2018). Nevertheless, dealing with advocates could be tricky, according to Emma, who found "some advocates personally invested and narrow in scope" and she aimed to avoid dealing with "individual gripes to focus on broadening inclusion to everyone" (2018). Regardless, Emma stressed "we welcome your feedback" and she described responding to groups, individuals and letters to the CEO as well as advising on questions posted online, because "we want people to talk to us" (2018). In that way, she believed, Oz Tel are better able to engage with them.

Emma's role was pivotal to circulating up to date information about access and disability to management, individuals and advocacy groups like Blind Citizens Australia and St Vincent de Paul who informed their communities directly. She found it most effective as these organisations knew how best to circulate information to their colleagues and members (2018). Likewise, Alex developed marketing materials to promote products directly to LOTE customers after taking advice from staff on culturally acceptable content for the different communities.

Community media also assisted Oz Tel managers with advice on ways to promote their products and accessible services to their users and they often collaborated. The Radio for Print Handicapped (2RPH), who provide accessible information by reading the news for their blind and low vision listeners, is one example of an organisation who knows the best way to engage their publics. Similarly, ethnic community media advised Alex on how best to promote new products to emerging LOTE communities in their language and by using appropriate incentives. She found feedback helped them to "design culturally appropriate communication that reached their audience" (2018). For example, community media reported on a pop-up promotion Oz Tel ran to encourage

the LOTE community to ring home for free and "trial the network," then they interviewed people in language to describe their experience and created "buzz in the community" (Alex, 2018). Alex found connecting with potential customers to build relationships in the community very effective to create awareness. She said the media also suggested incentives and special deals that were culturally important and increased engagement for this community, like Lunar New Year. Alex said that incentives "were very effective, for the Chinese community", and "something they always do now" (Alex, 2018). Working with people who shared culture enabled Oz Tel to improve engagement with these same communities and they were "empowered" to promote their services directly, according to Emma (2018).

Nevertheless, all managers described wanting to improve organic connections with individuals "to crack into new markets" (Alex, Emma, William, 2018). A presence at cultural events such as Diwali or Lunar New Year, and conferences about accessibility were some of the ways they were able to talk directly to potential customers to identify opportunities and build rapport. The product display stalls at these events gave managers a chance to ask, "what's happening, why aren't you with us, what can we help with to better the experience" (Alex, 2018). William agreed organic connections helped them to identify new markets, but lasting connections could be hard to make (2018).

Oz Tel looked to partnerships to expand their reach into different sectors of the market and their engagement with 'Remarkable,' a tech incubator for people with disability, directly aims to develop new ideas to build their business in this area. The 14-week program aims to identify access challenges and design to create tech solutions with people with disability. William described the collaboration as addressing "needs not disability", in line with Oz Tel's broader focus on access (2018). Weekly engagement with mentors in product design, business development and marketing for commercial viability upskills participants to develop new solutions to access (Remarkable, 2021).

The collaboration highlights the value of working with people with lived experience to identify their own needs, like the Spix App, designed to support people with speech impairment engage in gaming through development of speech conversion technology (Remarkable, 2021). The App supports gamers to verbalise positions and participate as part of a team with the ultimate goal to address social exclusion (Remarkable, 2020). The collaboration permits Oz Tel to keep abreast of ideas that William hopes will result in "finding the next Cochlear," the successful Australian hearing device company, because they are "well placed to support market entry" (2018).

By working with entrepreneurs and people with lived experience of diversity, who can be one and the same, Oz Tel creates a path "to build this section of their business" and empower innovators (William, 2018). Partnerships engage people with lived experience of diversity and entrepreneurs, to develop "inclusive design processes with and for themselves" (Emma, 2018). In doing so the communities develop their own solution and they promote it directly.

Similarly, a competitive grants program encourages community members to apply for support to design digital solutions to improve access for diverse communities that they have identified for attention. The grant focus varies according to identified needs and currently includes young people and vulnerable and remote communities (William, 2018). Cure Bionics is one start up that has made prosthetic arms and legs accessible for adults and children from 8 years. They create 3D-printed and customizable bionics that attach to the human body and have multi-grip functionality that are cool-to-wear (Remarkable, 2020). The product journey is supported by experts to bring ideas to fruition through the support of private and government funders like the National Disability Insurance Scheme (NDIS). The partnerships are developed with state governments to improve access for their harder to reach groups and as a side, they have created an opportunity for conversations between diverse communities and Oz Tel, according to William and Emma (2018). Emma argued collaborations "give them the edge" because they are tapping into the ideas of people with a passion for technology, who are informed by the people who need the variation (2018). The formal relationships had benefits that extended beyond their immediate focus and

enabled Oz Tel to be involved in a sector of the market that they hoped to develop further (William, 2018).

Specialist managers were formally connected with networks of stakeholders, advocacy groups and staff champions and they shared information and feedback on new processes and opportunities to engage which created an informal community of practice. However, many diverse publics were not connected to formal groups, and they missed receiving information to enable them to engage unless they had an informal connection with a staff advocate to assist them with information. Oz Tel were aware of a gap but were unsure how to address it given resources were limited (William, Emma, 2018).

These managers supported Oz Tel's goals and objectives to grow the business and they worked hard to improve access and inclusion for the diverse customers they engaged with through formal and informal connections with people with lived experience of diversity. The relationships improved their ability to identify engagement requirements and it gave them greater scope to understand the potential of the market. Many customers benefited from innovations devised for people with specific needs, like the SMART home App that proved effective for anyone who had access barriers within the home. The App was initially designed for the deaf community to control home services like gas, water, electricity, and security from a telephone, and proved beneficial for people with temporary injuries, older people and anyone wanting that convenience, according to Emma (2018). Emma said it was regarded as successful because designers engaged with the people who used it for feedback, but its broader application demonstrates the value of designing for a "need not a disability" (Emma, 2018). The fundamental shift in focus moves beyond the change of nomenclature in policy to a real-world change that broadens inclusion for multiple publics through cutting edge technology "to work better together" (William, 2018, Oz Tel Annual Report, 2019, p.10).

The philosophy shared by managers and advocates demonstrated Oz Tel's commitment to inclusive practice, but the application had its challenges given there were few specialist managers and staff champions for an organisation this size.

Barriers to engaging

A manager's ability to effectively engage their diverse customers relies on them knowing the organisation's policies and processes and having experience engaging with diverse customers. However, managers are constrained in their capacity to engage by the processes available, awareness of variations among staff and having a relationship to extend engagement.

Organisational Structure as a barrier

Organisational structure, intended to simplify relationships with customers, acted as a barrier to inclusion. The managers interviewed reported to different divisions and their goals and objectives also differed, meaning that customers with disability and customers from a LOTE background were managed under different programs and with differing objectives. For example, people with disability and people from remote and disadvantaged communities were managed by the Legal and Corporate Affairs division, who measured engagement against goals and objectives for sales and service, as well as against the Access and Inclusion Plan criteria (AIP). Engagement of LOTE customers was measured as part of the Consumer and Small Business division against goals and objectives on the number of product enquiries and sales. William described the approach as "noteworthy" and "demonstrated their focus on the market" (2018). Access and inclusion criteria were not assessed for LOTE customers unless they dually identified as part of one of the other groups, as noted above (William, 2018). Consequently, information on LOTE customer access was not gathered, and managers were unaware of success or gaps in communication.

Managers assumed LOTE customers had access because "most spoke English", according to Alex, and "anyone who didn't could apply for a variation online or ring a telephone number" (2018). LOTE customers were identified as a consumer group and

communication focussed on providing products in their language (Alex, 2018). The communication approach was strategic to make a profit as it aligned with the division's goals and was their marker of success. LOTE customers were defined "as a market to develop" according to Alex, rather than a minority group needing access (2018). The identification of LOTE customers in this way had an impact on the type of communication they were offered to support engagement.

Managers assumed these customers had access to the products and services they required because, as managers, they had achieved their goals and objectives and provided variations to the customers who needed them. Alex reported sales had increased and 30,000 queries a month had been received from LOTE customers to language specific help lines, so she assumed "customers had the access they needed" (2018). In taking this approach, she reported success against sales but Emma knew "they could do better," when it came to service (2018). She had lived experience of diversity and she was able to identify gaps and raise questions in parallel to achieving goals (2018). Although Alex and William described having a strong commitment to include diverse customers, their focus was on achieving the organisation's goals and objectives. They did so with the support of people with lived experience, like Emma, but they did not have lived experience of diversity themselves. As a consequence they did not focus on the experiences of customers in gaining access to products and services. They focussed on the number of variations of processes and products provided, so they were unaware access was a problem for many diverse customers.

The communication process was primarily driven by the organisation's goal to make a profit, and inclusion was added to meet their commitment to the AIP for certain diverse customers. The situation was made more complex because only a limited number of staff were familiar with entitlements under the AIP, which was managed by the Sustainability Division. Even though William argued "having [staff] buy in" was essential to successfully promoting engagement, AIP criteria were not embedded across the entire organisation, and many staff were unaware of access entitlements (2018).

Oz Tel's strategic framework relied on feedback to identify successful products and services designed to support diverse customers but it did not take account of whether customers could access them because they did not collect that type of feedback. For example, Alex said LOTE customers could ring a hotline, visit a store or apply for a translation from the website but information about how to access the translation was only available in English (2018) so that only customers who could read English could apply. Oz Tel's language policy was to "be inclusive of language not exclusive" and that meant everything was offered in English and translations were requested (Alex, 2018). Oz Tel had met the AIP criteria of providing workable variations, but they had not met the needs of many LOTE customers. Reinforcing this barrier was the lack of a feedback mechanisms for these customers.

Staff lack of awareness of variations

Oz Tel were an organisation in transition to the OTXX strategic plan from a large established onshore workforce of permanent staff to a smaller cohort of permanent staff supported by local and offshore contract staff. This was a big change in organisational culture and processes. The organisation's proud history of supporting their diverse and vulnerable customers with variations of services and products was further tested by a reduction in product offering from 1800 to only 20, to align with the OTXX strategy (William, 2018). The transition was significant for all customers but particularly for diverse customers as there was "a higher reliance on technology to support daily life", according to Emma (2018).

William found customers resistant to change to a newer product and he assumed it was because they "needed to learn new technology". However, Emma found, "it was because they feared they would not get the support they needed" (2018). The mismatch of understanding the issues diverse customers faced created a barrier that the organisation was unable to bridge. In part it was because they did not collect feedback to understand the actual experiences of diverse customers through their own words. Much of the feedback collected was via managers who may not have understood the issues, as described in the move to new technology. The staffing

profile had changed, and many staff were learning about "disability" and it was "often seen as an extreme" rather than specific to each person, according to Emma (2018).

The specialist staff who managed support for Oz Tel's diverse customers and their access to variations make up only a small proportion of the more than 60,000 on and offshore staff (Oz Tel Annual Report, 2019). Thus, they relied heavily on the website, stores and informal relationships with staff champions and advocates to extend formal processes and share information about variations. William said he and Emma managed transitions to new products because they "were familiar with …needs [of diverse customers]," and they knew these customers were used to a personal approach. However, William and Emma had to rely on other staff with less experience or understanding of Oz Tel's history, to assist customers with transitions. Many staff were new to the organisation and still learning the fundamentals of their job. The staffing profile had changed, and many staff were learning about "disability, often seen as an extreme", according to Emma, so educating them about customers' access needs, their rights and Oz Tel's services, including variations to products and services, was essential (2018). Staff who were part of the Sustainability Division held expertise but this was not shared to all staff and it affected Oz Tel's ability to achieve the access goals they aimed for to meet their commitment to the AHRC.

Weak Relationships

Relationships were central to servicing of diverse customers because their access needs were very specific. However, Oz Tel were moving away from the individual contact that existed pre OTXX "to online as the preferred method", according to William (2018). Formal relationships with external bodies like Blind Citizens Australia and Speak Deaf were maintained, extending engagement through feedback, although these relationships were not without their difficulties. For Emma they often had "their own agenda" based on "individual gripes rather than attempt to improve engagement for everyone" (Emma, 2018).

Oz Tel struggled to engage with the full range of diverse communities. To maintain relationships with diverse customers, managers "relied on the goodwill of staff"

advocates and champions to extend their formal engagement processes, according to Emma (2018). However, when staff who had been advocates and champions left, they were not replaced because this engagement process was informal, not measured and not officially supported by Oz Tel. Thus, many diverse customers who expected a level of service, based on their previous relationship, were unable to find the right staff to support them.

Staff attitudes to diverse customers proved a strength and a challenge to affect relationships, according to Emma. She said staff saw LOTE customers as 'relatable' given the number of people from multicultural backgrounds on staff, but they struggled to engage with "people with disability" even though most people know someone with disability (Emma, 2018). Emma argued the attitude was "reflected worldwide" and Oz Tel's change of focus to attend to customers' 'needs' not their 'disability,' shifted the focus to a rhetoric "engaging with more inclusion talk", more in line with the AIP policy and anti-discrimination legislation (Oz Tel, Annual Report, 2019).

Staff understanding of customers' awareness of variations

Staff often assumed that diverse customers would be aware of variations of products and information. But Emma knew "raising awareness" was difficult because she had lived experience of exclusion, as a person with disability (2018). The specialist staff who had skills in engaging generally with diverse customers were few in number but did not always have the communication skills to develop targeted messages to engage them. Instead, to help them design and promote variations directly to the members of advocacy groups, well connected managers tended to draw on formal and informal relationships they held with staff who were actively engaged with advocacy groups and specialist media (Alex and Emma, 2018). Emma found communities would take the information and adjust the content and distribution style to meet their access needs, as she had done with the e newsletter by featuring the experiences of people who would use the products. In this collaborative approach, Emma found "the community do the work to advertise... by word of mouth" and give the message insider credibility

(2018). She was also aware that while specialist pages and variations were in place, Oz Tel were not set up to measure how many customers tried but were unsuccessful in accessing this information (Emma, 2018). Alex and William thought "they'd done well" to achieve accessible products and processes but Emma felt there was room for improvement (2018).

The relationships between specialist managers and people with lived experience of diversity created shared norms of practice, through skills that were built together. However, the significance of these relationships and their importance in developing shared understandings was not acknowledged or resourced as part of the ongoing engagement processes. As a result, some staff were informally propping up the communication processes for diverse publics because their individual goodwill and friendship led to shared norms of culture and therefore to an inclusion that was not supported by the official practices and processes of Oz Tel.

Customers and their experiences of inclusion

Six of Oz Tel's customers were interviewed. Three were from a LOTE background and three self-identified with disability. They were selected based on their diverse background and because their level of engagement with the organisation varied. Two were selected because they were actively engaged, two said they were aware of the organisation and actively engaged at times but not always, and two were aware of the organisation and only engaged when it was essential. The last two are regarded as latent because they are the least engaged. This selection process aimed to deliberately avoid hearing only from the most engaged customers to compare engagement experiences of a range of customers, in line with the sentiment of this research to identify diverse minorities' experience of inclusion. The process follows Miles, Huberman and Saldana's data collection method of listening to people at the centre to compare with the experiences of people on the periphery (2014, p.37).

All customers with disability were members of advocacy groups. Their involvement with advocacy groups allowed them to have access to information and they were more knowledgeable about Oz Tel's access and engagement policies and processes than the

Language Other Than English (LOTE) customers, none of whom was associated with an advocacy group.

David, Ian and Nicole all identified with disability. Each was a member of multiple advocacy groups and liaised with Oz Tel directly and via their group. David has been a customer of Oz Tel for thirty-nine years and chose them because of their "superior infrastructure" (2018). He identified as a person with a vision impairment and described himself as very actively engaged with Oz Tel.

Ian is a customer of 20 years, and has extended the relationship his parents have had with Oz Tel. He is regarded as actively engaged by Oz Tel but he described himself as actively aware. Ian identifies with a visual impairment and hearing loss, and he described having difficulty accessing many of the services Oz Tel offered (2018). Ian also manages an advocacy organisation for blind customers, and he represents their concerns directly to Emma, Manager of Access, and Inclusion.

Nicole is the least involved with Oz Tel, but she regards herself as aware of their products and services because of her extensive history of engaging with them over many years, as an advocate for an employers' network. As a customer, her level of involvement varies and at the time of interview she is regarded as a latent client. Nicole has a visual impairment.

All three customers with disability were aware they had a right to access Oz Tel in a form that supported their engagement to purchase products but some had experienced difficulty purchasing products and some had experienced difficulty getting support for two reasons. Firstly, they reported, most general staff were unaware customers with disability could have variations of access and variations of products. Secondly, all faults were resolved by offshore staff, who did not have the same understanding of Oz Tel's obligations to provide access. These customers felt the "service they were getting was second rate" because they had to deal with offshore staff who "had no disability-specific awareness" (Nicole, 2018). David said you had to work harder to receive the resources you were entitled to because offshore staff were unfamiliar with access rights (David, 2018). David said, "it wasn't part of their

[contractors'] country's culture to have specific accessibility rules". Ian said he "couldn't understand their accent" that was made worse by his hearing impairment (2018). They all experienced having the phone go dead when waiting to resolve an issue and David assumed it was deliberate because offshore staff were unable to fix the problem (2018). Nicole agreed, "they were not trained" (2018).

Jihun, Beatrice and Malee are all from a LOTE background. Jihun and Beatrice are able to read English but Malee does not. As with the other customers, their level of engagement with Oz Tel varies. Jihun is newly arrived in Australia from a Korean background and has been a customer for under 12 months. She speaks Korean and English and she has actively engaged with Oz Tel. Jihun said, she chose Oz Tel as her internet provider because "they are the biggest" and she assumed "the best" (Jihun, 2018).

Beatrice has been a customer for 8 years. She moved to Australia from Spain and she speaks Spanish and English. Beatrice is an aware customer, and she engages with one of Oz Tel's tech programs to support people she works with in multicultural communities. Beatrice found, "Oz Tel have some great programs on offer but many people are not aware of them". Beatrice is described as an aware customer because she is engaged when she needs access.

Malee comes from Thailand, and she has been a customer for more than 20 years. She speaks Thai and some English, but she is not fluent. Malee relies on her son to speak with Oz Tel if they call her or if she has an issue. Malee said she sticks with them because of her belief that "they are the best". She is a latent customer who only engages via her son.

All three LOTE customers were able to purchase products online or instore, but they struggled to connect with Oz Tel to fix issues for two reasons. Firstly, as each explained, they had an accent that the automated telephone system used by Oz Tel did not understand. They had to wait in a queue until an operator was free to discuss their issue rather than being triaged for quick attention. Secondly, all faults and enquiries are dealt with by offshore staff with limited local knowledge and shared

processes, and these customers struggled to understand the accents of the offshore staff, even though they all said they "felt bad" mentioning it, recognising that they themselves speak with an accent (Beatrice, 2018). All diverse customers described these interactions and "feeling awkward about raising them "to justify entitlements" but Ian said "it has to be done" to meet the basic accessibility requirements (2018). Nicole agreed. She described spending "time discussing discrimination with offshore staff and her entitlements to find staff were incapable of providing them because "offshore staff were not briefed on the process" (2018).

Following is a Table providing a snapshot of each customer, their diverse background, level of engagement and relationship to the organisation.

Table 6.2 List of customers interviewed by name, diverse background, level of engagement and relationship to the organisation

Note: all names are pseudonyms

Interviewee	Diverse Background	Level of engagement with the organisation	Relationship to the organisation
David	Disability	Active member	Customer and member of a peak body for people who identify with disability
Ian	Disability	Active/Aware member	Customer and manager of a peak body for people who identify with disability

Nicole	Disability	Latent member	Customer, advocate/advisor and member of a peak body for people who identify with disability
Jihun	LOTE	Active member	Customer from a Korean speaking background
Beatrice	LOTE	Aware member	Customer from a Spanish speaking background with an association to a tech group for her members
Malee	LOTE	Latent member	Customer from a Thai speaking background

Customers describe their experience of engagement with the organisation and the following themes arose from interview data on questions that aimed to identify inclusive communication.

Awareness of specialised products and services

Customers were not necessarily aware specialised products and services were available to support their engagement because they did not receive communication about the offer of specialised support. Latent customer, Malee, was a good example of a diverse customer of Oz Tel who was excluded; she said speaking to someone in Thai was the best way to engage with her and she had no idea it was a service Oz Tel offered. The breakdown in communication occurred because she was unable to read the information available in English to know a variation was available for her in Thai. This was a consequence of Oz Tel's language policy being "inclusive not exclusive," as

described by Emma and reported above. The offer of an accessible variation of information, that is, as specialist translation service, was written in English on the website and thus it was inaccessible for people like Malee who were unable to read English (2018).

Malee was not disappointed by the level of service she received because she had "not expected" to have access to information in her language. She had no information to the contrary and did not look for information in her language (2018). Malee knew she lived in an English speaking country and she had low expectations of having better access because of her language skills. In contrast, Ian, David and Nicole, as customers who identified with disability, expected to receive the services and products they needed. They knew their rights because they were long term members or managers of advocacy groups and they were familiar with Oz Tel's obligations to abide by anti-discrimination laws and Access and Inclusion policies (2018). Ian regularly surveyed his members for feedback or took feedback directly to Oz Tel when issues arose, on behalf of his members. Malee was not connected with an advocacy group nor did she have contact with a staff member to help her meet her needs. She relied on her family member to translate (Malee, 2018). Active customer Jihun and aware customer Beatrice were both fluent English speakers and readers, thus they had no problem obtaining information online.

Other customers found their own workaround to obtain information. Aware customer, Ian googled what he needed because he was unable to "navigate the busy website" with the specialist software he used as a person with low vision (2018). Active customer Jihun used the chat function to ask questions and avoid going through the automated telephone system that blocked her because of her accent (2018). This was a workaround that active customer David found "unhelpful"; he "preferred to speak directly with a person" to convey his needs to have immediate feedback to be sure he was understood (2018). No one communication process or workaround addressed every diverse customer's need to engage, something that latent customer Nicole, and aware customer Ian acknowledged. Ian argued that "having a range of access points" was essential to inclusion (2018).

Customers reported that many Oz Tel staff lacked familiarity connecting with their diverse customers because it was left to specialist staff and the organisation did not collect feedback on their access experience to understand the specific barriers. Latent customer, Nicole described being unable to make a complaint about receiving her bill because "the process offered was inaccessible" for her e-reader software (2018). Active customer David was unable to purchase a phone over the phone because he did not have enough points to verify his identity. He knew he had an "an exemption to the 100-point verification system, as a person with low vision", but the staff did not know about it and they were unwilling to investigate it (David, 2018). David said he needed to make a case every time he purchased a new phone and he assumed this was because the information about the exemption was not shared with sales staff.

Aware customer Ian and active customer Jihun reported similar examples of having to resolve their own telecommunication installation issues. As customers, they were dealing with contractors who had not received the information needed to solve the problem. Although Ian could provide feedback to his advocacy group that would reach Oz Tel, Jihun had nowhere to provide any feedback. The feedback process counted product sales to measure market share, and there was no process to capture the feedback experience of diverse customers' access to information unless customers were part of the AIP and USG criteria that collected feedback. This meant that vulnerable people, including LOTE customers that did not read English, like Malee, were left outside of the Oz Tel feedback loop, with her problems with access to services being unknown to Oz Tel and Oz Tel unaware of this (2018).

Advocacy groups provided a pathway that created access to products and services and promoted it directly to their members; this formal engagement process made it possible for advocacy groups to engage in product development as well as to provide feedback. Aware customer Ian described achieving great success when he was invited to provide input on the two-step verification process that was initiated across the banking industry and was to be adopted by Oz Tel (2018). The involvement allowed him to tap into feedback from his members and that feedback changed the direction that Oz Tel had been planning to take. Emma said the process helped them to

"develop a policy and accessible process to be used for Oz Tel and it was adopted across many sectors" (Ian, 2018).

Ian was also pleased to be approached by Emma to give Oz Tel feedback on "touch screen technology for blind and low vision people" before devices were distributed in their stores (Ian, 2018). He had advocated for a change to the roll out on behalf of his members when initially approach by a large bank, however, he reported, they approached him after it was too late to make the change. He explained in some detail the problem the Bank had faced, including the unsuccessful mediation process with the Human Rights Commission and noted Oz Tel wanted to avoid an ineffective roll out and proactively worked with him to identify options to make the EFTPOS system accessible to people with low vision as well as people with other disabilities, such as those with poor fine motor skills. Feedback from his members recommended a keyboard be attached to the device to ensure it was accessible, and while feedback improved the process the "consultation had taken place too late" for a more cost effective resolution. Ian recommended organisations get his members involved "at the design stage, not following it" to maximise outcomes (2018). Nonetheless, Ian welcomed the approach from Emma and saw it as "the beginning of an ongoing relationship" that he hoped "will continue to improve engagement" (2018).

Advocacy groups were pivotal to sharing information and providing feedback from their members. However, many diverse customers including LOTE customers Jihun, Beatrice and Malee were not associated with a group and found it harder to connect with Oz Tel (2018). Even though specialist services were available, diverse customers were either unaware of them or the offer was inaccessible. The most actively engaged customers had the best chance of giving feedback because they were determined to resolve the issue and had the best connections but the communication process could be inaccessible, as Ian and Jihun found, because their feedback was not gathered or they "gave up" like Malee because it was a "waste of her time" (2018).

The customer service process had changed to meet the OTXX strategy of a reduced number of services and diverse customers with specific communication needs were unable to get the support to transition to a new service as they had expected. Four of the six customers interviewed described their "loyalty" to Oz Tel (David, Ian, Malee, Beatrice, 2018), and a considerable amount of goodwill was expressed, but their experience was that this commitment was not reciprocated. The change in service offering affected diverse customers the most because their access needs were specific but more importantly because staff were unaware of the long standing commitment Oz Tel had to provide access. Latent customer, Nicole said Oz Tel openly "acknowledge they want to do good things for people with disability" (2018) but she was "becoming increasingly unhappy with her lack of accessibility" (2018). Aware customer Beatrice said she "expected a good service", but she found it hard to convey her issue to staff because the customer service process was managed overseas, and staff "did not have the local experience" to understand her issue (2018). This situation often left diverse customers with nowhere to express their anger beyond advocacy groups and inaccessible websites.

Diverse customers struggled to obtain the customer service they expected because barriers prevented access to information. Customers with disability all described the benefits of having a contact in the organisation to provide support and active customer David, especially, highlighted the importance for him of "talking to one person" to resolve an issue (2018). Aware customer Ian said conversations were often complex and he "could take time to explain his needs" so being "passed onto another person and having to explain it all again, was very frustrating" (2018). David's experience of being "refused to buy a phone over the phone" was only resolved because he had "a contact person who gave him links to updated policy and processes" that he presented to justify his request for the variation in service (2018). Without this, he was not believed (David). Aware customer Ian was successful in lobbying to change a policy because he knew "who to contact" when representing his group. However, when he contacted the organisation through "offshore staff" as an individual customer, he

failed to achieve support to install a new connection because the staff were unfamiliar with his needs (Ian, 2018).

The engagement process was ineffective for all the LOTE customers interviewed regardless of their engagement status of active, aware or latent. Language was a barrier for latent customer Malee, and Jihun and Beatrice, as active and aware customers, had difficulty accessing telephone support because of their accent. They also struggled to effectively communicate their access issues to offshore staff who were unfamiliar with the local environment. Neither Jihun nor Malee were aware that specialist information was available for them, nor were they looking. Jihun assumed she would be able to engage because she "spoke English fluently" (Jihun, 2018). Neither received any communication directly about accessible options because there was an assumption they would go to the website or store if they wanted information about access. Jihun was surprised there was "no customer service, following her experience in the US and Asia where the organisation follows you up" (Jihun, 2018). Active customer Jihun and aware customer Beatrice each communicated fluently in English and were able to select their products and services from the online platform. They were not looking for a specialist service, they merely wanted to resolve an issue. The offshore staff were unable to fix the problem because the questions needed specific knowledge about the product offering and installation environment that was unavailable to them, a problem not associated with language.

Customers with disability had a formal set of service expectations. Latent customer Nicole knew that, as a person with low vision, she could register to have her telecommunication bill in hard copy as "her preferred accessible communication", because the format offered was inaccessible for her, and she knew her rights (2018). Similarly, active customer David knew he could have his bill emailed in a format that complemented his e reader (David, 2018). Both customers were aware of the process, and they knew they could ask for a specialist service because they were part of an advocacy group that kept them up to date with information that affected members (Nicole, David, 2018). Having a formal connection was a benefit for diverse customers

because their engagement needs could differ, and they were able to share that information to their members, so they were effectively supported.

The automated telephone system is a good example of a customer service process designed to efficiently triage calls that was completely inaccessible for some LOTE customers. The system did not recognise certain accents and these people were placed in a queue to speak with a staff member rather than progress through the queue to have their issue resolved more quickly. Active customer Jihun said it was "a complete waste of time" (2018). She had a strong Korean accent that was not recognised by the automated system. When she realised the system was the only way she could resolve her issue, she was dumbfounded that this was the best they could offer (Jihun, 2018). She reported repeating her request for service to fix her "internet, internet INTERNET over and over again and again" on the phone until she finally got through (Jihun, 2018). She said the process was "really frustrating from the beginning" and it set the tone for her relationship going forward (Jihun 2018). Thus, the contact system was inaccessible for some customers, and aware customer Beatrice found the process "humiliating", as a long term customer with a very slight accent (2018). She described it as "ineffective and unreasonable" that they "didn't have a system to understand their customers" when she was "dealing with an Australian company in Australia" (Beatrice, 2018). Both active customer Jihun and aware customer Beatrice found fixing issues "a nightmare".

Active customer Jihun suggested "including a prompt to speak with a person" as part of the automated telephone system but she had nowhere to submit that feedback and no interest to go out of her way to convey it (2018). She suspected "they were aware that unsatisfied customers do not bother to communicate" and suggested they were afraid to offer customers the chance to speak with 'a person,' as they may receive abuse so instead they pushed all communication online (2018). The automated telephone system may have reduced costs for the organisation, but Jihun argued it was "a waste of money because the poor communication left customers feeling very frustrated" and unwilling to engage productively (2018). No interviewee with disability

mentioned the telephone system as problematic; they were all native speakers of English.

Changes to Oz Tel's staffing that mixed old and new, permanent and contractor, local and offshore staff had a big impact on all customers' engagement with service but particularly diverse customers who were already facing barriers.

Communicating with offshore staff in the call centre presented several challenges. The customers with disability agreed there was "no disability-specific awareness by offshore staff" (Nicole, Ian and David, 2018). Active customer David argued directing customers to offshore staff, "made it near impossible to enquire or fix a simple issue" (2018). Latent customer Nicole said, "it was all about communication and making the policy clear for all employees" and while she knew her rights many customers with disability did not, or were not able to follow up (2018).

Aware customer Ian found offshore staff were unsure of how to manage issues that he and his members presented, "because they don't understand disability, even though they try." He found there were "cultural differences and different expectations" of what was needed. Ian said offshore staff were unaware of how "independently people with disability like to function and the infrastructure needed" to make that work (2018). The process "was not working at all", according to Ian (2018). Active customer David described having a difficult conversation with staff about his engagement needs because "they are unfamiliar with them", then being told they were "going to check a question", and "all of a sudden the phone disconnects" (2018). David said, "he got the feeling they just decided they don't want to deal with you" because they, "don't know how to deal with issues that are different" (2018). It was up to David to ring back and "explain his request again to another telephone operator" and he said, "it was difficult" because they were unfamiliar with his needs and he often had to reveal personal information time and time again with different staff (2018). Nicole found staff to be "very polite and say, we'll ring you back" when they were unable to fix an issue, but "they never do" and she said she "sensed it was because they were unsure of what to do" (2018).

Active customer Jihun found "information was not shared" between local and offshore staff to fix her internet cable issue, and it was up to her to follow up until it was resolved. This was completely at odds with her experience of excellent service in Asia (Jihun, 2018). The problems she experienced in simply trying to report and fix her home internet is an example of the everyday communication challenges diverse customers faced because of changes in organisational structure. The process required her to speak with a local person who directed her to the call centre offshore where that staff member arranged for a local technician to visit and fix the connection. The local technician misdiagnosed the problem. Jihun advised she "did not have an internet line to the house at all" (Jihun, 2018). Jihun was surprised she was sold the product given local "staff checked we had a cable" and the offshore staff requested the fix based on data held about the property, but the technician who attended the site said there was no cable (Jihun, 2018). It seemed incongruous to Jihun they "did not share information" (2018). Further, this technician told Jihun she "needed to arrange another technician to install the cable" as she (the technician) could not arrange it. That is when Jihun realised she "was not talking to a staff member but a contractor" (2018). Jihun had to go back through the automated telephone system that was unable to understand her to log another job. She was astounded that she had to ring them back each time given "they've got my number, so why don't they ring me?" (2018). It was "a time waster" according to Jihun because "they sent the wrong person again" (Jihun, 2018). It took her three months to fix. She suspected many customers were unaware the organisation was using contractors whose focus was fixing the issue, not representing the organisation and that meant "poor customer service" to Jihun (2018). Jihun argued Oz Tel needed "better communication between staff and contractors" if they were serious about customer service (2018).

Aware customer Ian, a person with disability, had a similar experience. He moved to a new house to find his internet service was not connected. He assumed it would be "a quick telephone call to flick a switch, but no", the technician found there was no internet to the house (Ian, 2018). Ian had to arrange for it to be installed as it was an essential service for him but he said, "it was extraordinarily difficult to sort out" because he had "to deal with staff who were unfamiliar with his access rights as a

person with a hearing and vision impairment" (2018). Ian said, "the technical team were great, but the process was difficult" to arrange because the offshore staff and local contractors were "unable to understand what people with disability need" (Ian, 2018). Ian suggested the problem might be that Oz Tel did not share their accessibility guidelines with all staff (2018).

The way staff dealt with issues and shared information, showed that priorities varied and there was little consistency in service, frequently leaving diverse customers "feeling frustrated and confused", according to Ian (2018). Both aware customers Ian and Beatrice assumed misunderstanding arose because offshore staff were "unfamiliar with the local environment" and they needed to explain their circumstances in detail (2018). When Beatrice called up to fix a "non-standard request", she found the offshore staff unaware of it and unable to help. It took a long time to fix and she said it made her feel like she was not "getting a good service" (2018). Latent customer Nicole argued, on the other hand, that offshore staff had "limited authority and were unable to fix complex issues" (2018), and she concluded that business protocols appeared to vary between offshore and onshore staff. Contractors were working to different agendas, according to Jihun, with less focus on customer service and more focus on completing the job (2018).

Staff lack of knowledge about products and services was not always a deterrent. When customers thought they could gain access to make a difference, they were persistent. Aware customer Ian described David as being "determined to get the AFL Sports App up and running" (Ian, 2018). He saw the opportunity to collaborate in the design phase as empowering and said, "we've seen some really good results" (2018). However, David found, he needed to fix a glitch from a system upgrade that prevented the App from working and it was only resolved because he hung on the phone for seven and a half hours until it was fixed. David described "it as a simple fix", but he had to persuade multiple staff it was an Oz Tel issue and they "were not listening"; they kept transferring him from one person to another suggesting it was something else then "someone pressed a button and it upgraded" (David, 2018). Oz Tel staff made assumptions about the operation of the App, presumably because they held no

information. David was determined to fix it as he had invested considerably in the process. The collaboration was successful in that it established the App, but staff were unaware of it, suggesting a gap in communication. Ian said, "David's persistence drove a new process to work collaboratively in the design phase of the AFL App" and "we've seen some really good results follow" (2018).

Poor customer service occurred when policies within the organisation were in conflict. Nicole, as a customer with disability, found this to her cost. Customers with disability were told they could request "communication in the form they needed" at no extra charge, as part of the AIP protocol to improve engagement. She requested her telephone bill in hard copy, to use with e reader software and she knew registration triggered a process to provide the variation because she was familiar with Oz Tel's AIP policy. However, the bill did not arrive in a form she could access, and her telephone was disconnected because the bill was not paid. Nicole was furious, as "having a phone is an essential service for a person with low vision", so she rang to complain and after some time arguing for her right to have the bill in that form free of charge, they "sent a bill in braille" (2018). She rang back again and then they sent her an electronic bill and they justified that decision because "they could tell" she had access to the internet (Nicole, 2018). This example demonstrates the conflict in policy: the Oz Tel staff were following a rule that said if a customer has access to the internet, they will receive an electronic bill; this contravened a customer's right to access as expressed in the AIP (2018). Staff privileged a rule for engagement above a rule for access and Nicole was both excluded, and cut off (2018). Nicole rang up and complained to staff again, but they were unable to register her issue beyond referring her to "a complaint form that was inaccessible" for her (2018). She asked to speak with someone in Australia but they were unable to transfer her. Nicole argued the fault sat with Oz Tel as "they did not give their offshore staff authority to make a change to customer's records" and diverse customers had few avenues for complaint (Nicole, 2018). Nicole was "saving up her braille bills to take to the Ombudsman" (2018).

For effective customer service, according to Nicole, a good relationship with a staff member who knew about specialist services and had expertise in disability "to

understand you" was key (2018), something that was no longer possible under Oz Tel's OTXX strategy. David agreed his approach was "to find a person and come back to that person", but he said Oz Tel "were making it increasingly difficult," with new and reduced staffing (2018). There were few specialist staff, and the offshore customer service system did not support follow up calls, so customers needed to ring back when the issue was not resolved. Ian described frustration at repeating "my situation again and again" because every time he rang, he spoke with a different person (2018). Nicole described the process as "a time waster and frustrating" (2018). Beatrice said she felt "let down" and David said "it rarely went well" (2018). Nicole argued the organisation "wanted to do good things" but the communication system was failing diverse customers who really "only wanted to speak with a person" (2018).

Ian compared his personal experience of engagement with his engagement on behalf of the advocacy group and said they "were very different" (2018). He said it was because he had a relationship as part of his role managing the group that he did not have as an individual customer ringing up (2018). Relationships improved customers' capacity to connect with Oz Tel and Oz Tel's ability to understand access and engagement gaps. However, they were limited to people connected with an advocacy group or specialist manager and many customers were not connected at all, like Malee, Beatrice and Jihun nor were the processes effective for them. Oz Tel was focussed on goals and objectives informed by feedback on products and services and even though they wanted to improve inclusion, the strategic structure did not allow them to capture feedback from diverse customers about their access. Ian argued the cost of promoting variations of services to diverse customers was "relatively minor for a big corporation" and he assumed the argument was about "penny pinching" (2018). The minor costs of inclusion for the diverse publics interviewed were overlooked because feedback was not collected and addressed unless it was aligned with a specific policy reported against in the Annual Report.

Discussion

Oz Tel developed policies and communication processes to ensure that its diverse customers had access to specific products and services. However, they failed to provide appropriate, inclusive, services, because their processes and practices covertly prioritised compliance rather than inclusion, access rather than accessibility, and profit making at the cost of innovation.

Compliance rather than inclusion

Oz Tel had been a government-funded organisation for many years and their legacy to serve diverse customers was a feature of their customer base. However, their strategic direction had changed to a for-profit market orientation, and inclusion was measured differently. Successful inclusion was measured by a strategic communication framework that aligned with compliance measures at three levels, those concerning the external, societal, requirements, those concerned with the internal workings of the organisation and those concerned with the practices of the organisation.

Oz Tel's purpose "to create a connected future for everyone" was underpinned by a strategic communication framework to meet their goals of providing an inclusive service to their customers and to comply with values derived from a human rights framework (Oz Tel, Annual Report, 2018). The structure reflected Oz Tel's history that valued a human rights perspective of inclusion to "recognise the inherent value of each person" for customers and staff alike (Universal Declaration of Human Rights, 1948). Its transition to a for-profit organisation shifted responsibilities to place a greater emphasis on meeting "stakeholder and shareholder expectations" (Oz Tel, Annual Report, 2018). The change in strategic communication structure juggled profit-making goals with human rights values to achieve equal access and maintain a focus on inclusion, but success was measured separately and differently across the two diverse publics who were the customer focus of this study. The process created a divide between long term loyal customers who expected particular attention and staff with a focus on delivering sales results and was reported by the diverse customers interviewed as staff being "unaware of the service they needed" (Nicole, 2018).

Few compliance measures for diverse customers were in place for staff to gauge success and fewer processes reported progress against them, so it was unsurprising that managers were unaware that the organisation's norms of practice had changed and these customers no longer had the same level or type of service as they had previously received, and thus felt they had been excluded. The strategic communication process privileges norms of practice shared and covertly excludes publics who sit outside of these norms (Davis, 2006, Vardeman-Winter and Tindall, 2011, Vardeman-Winter, et.al, 2014). This case study has shown how diverse customers now often sat outside the norms of practice and were therefore often excluded (Kim, 2001).

Nevertheless, a history of including diverse customers remained important and William described a change of nomenclature from "disability to accessibility" in all communication as significant (William, 2018). The change was motivated by the introduction of the *NSW Disability Inclusion Act 2014* to address discrimination including a name change from Disability Inclusion Planning to Access and Inclusion Planning to better describe the aim (Sax Institute DIP Review, 2019 p. 12). While the plan was argued by the Australian Network on Disability (AND) as a positive move towards inclusion because it would align with the *Disability Discrimination Act 1992*, it also demonstrated an organisation's compliance to ensure they met their obligation (AND, 2021). William argued the change of name was pivotal to improve inclusion (2018). Emma agreed that "servicing a need" rather than addressing a "specific condition" created opportunities that improved inclusion for multiple customers (2018). The SMART home phone App, described above, is an example of such an initiative. By addressing a 'need' Oz Tel was able to design a product for hearing-impaired customers, as well as many others including people incapacitated with short term injuries, and older people with physical challenges. For these people, the change of nomenclature created opportunities that went "beyond a name change, opening up new ways of including", according to Emma (2018).

Oz Tel's mainstream strategic communication framework to engage their customers was part of the Consumer and Small Business Division but it was inadequate for their

diverse customers because their particular access needs were not considered. Customers with disability were managed by the Sustainability Division via specialist programs and staff connected with the AIP and USG to support their access needs to align with a human rights framework. The organisation's communication structure reflects their values and priorities to ensure they remain viable, but the values and priorities were not always easily aligned. Edwards argues the strategic communication framework "includes realities that go beyond whether organisational objectives have been met to reveal wider social, cultural and political consequences" (2018, p. 5) but the findings of this case study show that priorities were not aligned to acknowledge their different but equally valuable contribution to the organisation's mission.

Compliance with the goals and objectives of the organisation affected services to diverse customers. These goals and objectives were intended to maintain Oz Tel's position in the market, and their resourcing and measures of success were reflective of the organisational values. However, success was reported differently for diverse and mainstream customers and created tension for staff working to achieve different deliverables and customers expecting a good service. Successful service provision for diverse customers was reported by compliance with AIP and USG criteria and mainstream customer service provision that included diverse customers not included in the AIP and USG was reported against sales. The reporting process affected the level and type of service customers received because it demonstrated what was valued and justified resourcing to extend or reduce levels of service. Pereira and Figueiro warn a focus on compliance can incentivise the organisation to resource and improve inclusion, but it can also lead to exclusion if it is a sole focus, as options to expand inclusion are not considered (2020, p. 60).

The feedback process, referred to as extensive by Alex, counted every product "touch point" to identify opportunities to increase sales rather than assess access to service, that diverse customers could need. There was an assumption customers had access, or they could request access via the website, store or telephone service, according to Alex (2018). There was no process for customers to advise Oz Tel they did not have access, as Malee found when unable to read the website and with no way of telling

them. Oz Tel assumed the feedback collected from diverse customers via the AIP and USG programs sufficiently dealt with their needs, but many customers including LOTE non-English speakers, were not included in this feedback process, and Oz Tel were unaware. Feedback was limited to the engaged publics of the organisation because they shared norms and understood connections. The aware or latent publics who were already marginalised because their access was not addressed were excluded (Dawson, 2018, p. 774).

Oz Tel's strategic communication process was, according to their documentation, driven by goals and objectives to maximise engagement with all their customers. However, despite the emphasis on inclusive policies and practices, customer engagement was managed separately across two divisions, creating a disjunct in their communication. Support and services for customers with disability were managed under the Sustainability Division and success reported against the AIP and USG criteria (Oz Tel, Annual Report, 2018). All other customer engagement was managed under the Consumer and Small Business Division. The separation had benefits as attention was honed and feedback collected about the experience of inclusion for customers with disability, and their barriers were identified. However, the information was not shared across divisions and when customers rang to fix a fault they were directed to the Consumer and Small Business Division and they had no information about specialist customer access under the AIP and USG protocols. David's experience of being refused the option to purchase a phone over the phone, "as a customer of 39 years who had purchased many phones", occurred because staff were unaware of his entitlements as a person with vision impairment (2018). Oz Tel staff assumed diverse customers had special access because they were part of the AIP and USG programs or they could go to the "always on, always accessible website" to request the accessible provision they needed. A culture of inclusion was intimated but not shared because the divisions were working to different goals and objectives, and communication was fragmented. The feedback system was narrowly aligned to the organisation's goals and objectives for profit making (Macnamara, 2018, p.193) and compliance to specific access programs, not their broader values. The lack of understanding about the services provided across the divisions led to many diverse customers being excluded.

The Consumer and Small Business Division led Oz Tel's internal communication process to improve engagement and achieve their goals. They assumed customers, including diverse customers, had the access they needed to purchase products because the feedback they collected did not indicate otherwise and "sales were increasing", according to Alex (2018). Consequentially many staff were unprepared to provide additional support to their diverse customers, according to Ian and Nicole, who found they were referred to the website for advice on specialist services (2018). The internal communication process for diverse customer service was fragmented as it spanned divisions with minimal circulation of information between specialist managers and mainstream staff, according to the diverse customers interviewed. The separation made it easier to dismiss the lesser known process because they were seen as harder to resource (Mitchell and Snyder, 2013, Barnes, Mercer and Shakespeare, 1999). The experiences reflected Lee and Lutz's argument that access to everyday processes affect mainstream populations differently, representing a challenge for communicators to address the needs of non-mainstream publics (2005).

Some staff struggled to engage with diverse customers and that may have been because they were ill-equipped to manage the exchange or they had limited experience working with people with disability. Ian described the challenge of having staff agree to support his need to meet on site to resolve an issue as a person with sight impairment because they did not understand his needs (2018). Emma argued misunderstanding reflected society's ambivalence to engage with people with disability because they were unsure of how to act. Garland-Thomson was more specific, putting it down to the absence of people with disability in day-to-day representations and the media (2016). Alex, on the other hand, found engaging with LOTE staff to improve engagement with their customers "a strength of the organisation", something that staff liked to do (2018).

The difference in communication between people with disability and LOTE staff and customers reflects framing for attention arising from standards of sameness that Campbell describes as ableism (2009). She argues when the standard is not achieved people are framed in reductive ways. LOTE staff were seen to represent a societal

norm and their value as interpreters was described whereas people with disability were not presented according to their ability, they were presented according to their need as people with disability and the process prevented them showcasing their value to the organisation and to society in this way. The norms of practice in the organisation could be seen to connect LOTE staff, but at the same time, they "can constrain people to a category" (Ahmed, 2012, p. 17), or even leave them without an appropriate category, as happened to LOTE customers who did not read English, so the challenge for communicators is to confront worldviews to make inclusion possible. A culture of inclusion is possible when an open, participatory and inclusive environment is formally established for all staff through effective listening and feedback processes (Lee, Li and Tsai, 2021, p.54). However, formal processes alone will not succeed for culturally diverse publics because misunderstanding occurs when culture is not shared. Lee et. al., argue informal systems need to be incorporated (20221, p.55) as Malee found when unaware she could have a translation in Thai. But the information was not accessible unless her son was able to provide that informal link to it.

Bassel argues it is up to the organisation to provide a structure to accommodate the voice of minorities, otherwise their communication needs may not be shared (2017). By setting up different structural processes to improve inclusion for diverse customers, Oz Tel were able to measure success through compliance with organisational objectives, but they inadvertently "essentialised" their customers with disability, by reducing them to a disability, rather than focussing on a need (Oz Tel, Community & Environment, AIP 2017-2018, Corporate Strategy, p.1-2, 2018, Convention of the Rights of persons with Disability, 2006, Holliday, 2010, p. 260). Oz Tel had created a 'special pathway' that was exclusive to specialist managers and excluded non-specialists; this in turn prevented Oz Tel from achieving the inclusive vision they had hoped (Holliday, 2010, p. 260). The value of inclusion could be compromised by the measures available to track success. Daya argued when legislative compliance is achieved the organisation disregards diversity and inclusion because "it shifts the focus from inclusive outcomes to equity compliance" (2014, p. 304).

Oz Tel's communication with their diverse customers was focussed on access rather than accessibility and this inadvertently excluded many customers. In part this occurred because the organisation assumed that by developing a tangible product, a variation like a translation, audio or visual version of information, they enabled diverse customers to engage. However, many diverse customers were unaware variations were available as information had not reached them and the mechanism for engagement via the website, store or by telephone was inaccessible, that is, in some way, not usable by them. A normative framework must be adjusted to fit alternative normative contexts of information sharing diverse customers use (Hyland-wood et. al., 2021, p.7).

Diverse customers needed to be aware that Oz Tel offered them ways to engage with relevant services but Oz Tel's promotion of access was mainly via their mainstream communication channels, which were inaccessible (Vardeman-Winter et., al, 2014). In addition, some specialist advocacy groups promoted information directly to their members. This was particularly so for disability advocacy groups as their relationship with Oz Tel was formal as part of specialist programs and Oz Tel had an obligation to adapt processes to improve access. This relationship empowered advocacy groups to voice concerns and shape products and services but many diverse publics were not part of an advocacy group and Oz Tel found it hard to engage with them (Thill and Dreher, 2017, p.6). Advocacy groups were afforded agency to speak up in ways that others were unable to achieve.

Many customers were not part of an advocacy group, and their access needs went unnoticed. Customers like Malee, who spoke English with a heavy accent and did not read English, were unable to engage with the website or talk to a person. So, she remained unaware that variations of information, translations, were available for her. Like her, many diverse customers would have been oblivious to the existence of the variation and the possibility of using Oz Tel's services and Oz Tel remained unaware these diverse customers were excluded. They assumed promotion via their website, in

store or by telephone was sufficient because variations of information for diverse customers were available on request. Cultural differences were unrecognised and not addressed, and affected engagement opportunities (Chauhan, 2020, p.1, Everett, 2018, p.98). Ahmed argues organisations are "blinkered by their own needs" and Oz Tel failed to see their diverse customers were unable to engage (2012).

The position of Malee as a LOTE customer was at odds with the position of customers with disability, such as Ian and Nicole who knew they had the right to access information in the format they needed for their e-reader software because it was a requirement of the AIP to prevent discrimination (Disability Discrimination Act, 1992 and Racial Discrimination Act, 1975). They pursued Oz Tel until they got access to the service they needed and their capacity to resolve the problem was enhanced by relationships held with advocacy groups. Ian compared his experience seeking support for his members as a spokesperson for an advocacy group with seeking support as an individual to fix his own communication issue, describing the latter as extremely different because he had no relationship with staff as an individual. Therefore, he had no agency to achieve the access he required even though he was entitled to it under the DDA terms. Structural inequalities maintain or exacerbate social inequalities (Fraser, 2003) and the oppression is hard to pinpoint (Dawson, 2018, p.776). Here it was clear that information was not shared among the divisions of the organisation, and knowledge about specific access requirements was held by a small number of specialist staff. Communication is argued to be a two-way process but the structure in this instance was one way and specific to particular managers so most diverse customers were unable to access the information they were entitled to. Access is affected by structure and agency (Myers and Hansen, 2019, p. 147) and is particularly important for diverse customers already disenfranchised by systems that are unable to accommodate their access needs.

The problems caused by structure were compounded because offshore staff managed customer faults and complaints. Customers argued these staff were completely unaware of their access entitlements so when they were unable to fix an issue and customers were unwilling to hang up the phone, they transferred callers. Nicole

argued it was a necessary strategy for these offshore staff: they had no way of resolving issues because they were insufficiently briefed. Consequently, customers struggled to have their entitlements met. It was, therefore, unsurprising they were frustrated by having to go through the process that Ratcliffe argues is the responsibility of the organisation to establish (2005). Edwards argues minority "voices can be a vital impetus for change, if given the space to be heard" (2019, p.177).

Specialist communication skills were needed to promote access to diverse customers by understanding their service needs, developing clear messaging and by using their media. The importance of using the right media channels to engage diverse publics was highlighted by Tindall and Vardeman-Winter who showed that health messaging about heart disease sent via mainstream media missed engaging with the diverse publics they wanted to motivate because the mainstream media lacked relevancy (2011, p.293). Understanding your publics to identify motivators and barriers to engagement is particularly important in the case of diverse customers because "their unique cultural meanings and everyday lived experiences" may vary and require a different approach to communication (Tindall and Vardeman-Winter, 2011, p.297). By co-designing messages and distributing information directly by using the community channels Airhihenbuwa et al found successful engagement could be achieved (2020, p.1).

Engagement with ethnic media was informal and while journalists helped staff develop better communication to promote engagement with their LOTE audiences, the relationship relied on goodwill. No formal process was in place to identify LOTE customers' needs for access to services, suggesting their access and engagement was not as highly valued, despite William claiming they were a market Oz Tel wanted to expand into (2018). There was something of a vicious circle: managers were focussed on product sales rather than improving access and engagement because there was nowhere for customers to provide feedback on their poor experiences in gaining access and so managers could assume all was well and focus on expanding the customer base. In this context, LOTE customers had no agency because standard processes excluded them, because of language issues, and Oz Tel missed capturing

their feedback to improve relationships and ultimately sales. The problems faced by LOTE customers because of the structures and processes Oz Tel had in place reflect Couldry's argument that minorities suffer from not having the agency to put their viewpoint forward (2010, p.8).

Here lies the gap. Oz Tel were unaware their communication efforts were ineffective because they assumed customers shared understanding as they had no feedback to indicate otherwise. The mismatch was not obvious to either party, and although both sensed misunderstanding, there was no way to confirm it without sharing values intrinsic to the culture (Hage, 1997, p.99). As noted above, Oz Tel mainly collected feedback on products, not on access to service which was critical to identifying gaps for diverse customers. An exception was found in specialist programs because of Oz Tel's legal obligation as a government agency to monitor access. Oz Tel were operating to a hegemony of normalcy that privileged customers aligned with their norms of practice and by doing so, they inadvertently excluded diverse customers (Davis, 2013).

The offshore call centre staff were also affected by this "hegemony of normalcy". Customers struggled to convey their issue to offshore staff and felt incredibly annoyed they needed to be serviced by people that they felt were ill equipped to respond to their needs because of lack of familiarity with the local environment and Australian DDA rules. Norms of practice were clearly not shared and they misunderstood each other's intent. Many customers emphatically described feeling badly about mentioning dissatisfaction because they themselves were from a minority. The exchange united them in a way that made complaining difficult but essential because customers were unable to fix their issue. When Nicole had her service disconnected, it was because staff prioritised a rule that aligned with company policy access, not with human rights access. The staff were doing their job unaware of DDA legislation that in Australia would have been prioritised over a company rule. In this example, it was easy to see how norms create connections that are covert and while these connections are felt, they can be misinterpreted as racism or inefficiency because the people involved misunderstand each other's intention (Davis, 2013, p.10, Goggin, Steele, Cadwallader, 2017, p.338).

This was not the only example where norms of practice were not shared, and staff and customers struggled to meet their differing needs. However, as there was no option to give feedback Oz Tel assumed the process was effective. Lukes describes the exchange as holding implicit power with a focus on unconscious attention to actions that assume agreement is reached (1978, p.21). As such Oz Tel assumed customer engagement was satisfactory with few exceptions but, norms were not shared and the diverse customers who needed support the most were excluded.

Profit making and power

Oz Tel's goals were aligned to a "market agenda" and the feedback collected justified resourcing to build sales (Monbiot, 2016), not engagement with customers. This focus impacted the organisation's capacity to listen to existing customers and collaboratively design engagement to improve inclusion and to expand service in markets they described as a focus. Although the organisation aimed to include their diverse customers, the strategic communication process was designed to privilege goals to align with the OTXX strategy and as a consequence, it excluded diverse customers.

Oz Tel's vision and mission that described their values to create inclusive engagement with diverse customers was at odds with the strategic goals and objectives that underpinned their communication and resourced strategies to make a profit. Oz Tel could never provide the inclusion, that is the level of service, diverse customers were promised given the operational structure that was in place. Oz Tel had not recognised resources were inaccessible and feedback inadequate because they were focussed on the profit making goals of bringing in new customers, rather than providing services that gave diverse customers an equal level of access to services. Townsend et al., similarly, found tension between competing goals of economic growth and societal expectations of inclusion in health policy that meant fewer resources and less power was allocated to non-economic factors and therefore social expectations were pushed to the periphery (Townsend et., al. 2020, p. 116, 123). The organisations in their study were set up to prioritise a neo-liberal agenda because of the framework that was in place. Subsequent analysis of their study data found this narrow frame prevented

improved engagement with societal concerns and had a negative impact on their ability to achieve their goal of health equity (Townsend et al. 2020, p. 123-124).

Despite the potentially negative impact of the move to a market-based approach, the repositioning may enable connections beyond the constraints of a neoliberal frame to identify multiple ways of engaging across society. I argue that this re-positioning can create potential to develop more effective communication through collaboration. The collaborative design of the SMART home App by people with hearing impairment to suit their accessibility needs is a good example of a product designed for a particular market that achieved wider societal exposure and by doing so it was found to be effective for multiple markets (Oz Tel, Emma, 2018).

This philosophy of collaboration is paralleled in public communication scholarship to seek out multiple connections for exchanging ideas and building synergies within an active mediated public sphere (Dayman & Demetrious, 2014, p.3). Pathways, however, are improved when norms are shared (Kim, 2001). This is demonstrated by Oz Tel's shift to the OTXX to fit their neoliberal agenda and in Townsend et al.'s study of framing of trade agreements to improve access and influence health equity in Trans-Pacific Partnerships (TPP) (2020, p. 124). The framing of customers as a minority takes away the power they need to achieve the recognition necessary for equal acknowledgement and engagement (Shildrik, 2012, p.31, Goggin and Newell, 2005, p.75). Lukes argues "consensus arises from the suppression of those who lack prominence" (1978, p.19) and can be identified in Oz Tel's shift to the OTXX where diverse customer engagement became invisible. Consequentially, diverse customers struggled to convey their experience of exclusion because the system did not accommodate their needs and as they were few (Thill, 2015, p.40), they lacked the power to speak back (Couldry, 2010, Edwards, 2016, p.9) and their input was easy to dismiss. This can be seen when Alex described feedback given by a customer complaining about not having a person who spoke their language in store at the booked time to translate, as a "neutral" comment not needing a response (2018). The scope for decisions about follow up action was narrowly conceived according to Oz Tel's profit-making agenda. Thus, the examples of views suppressed or not considered

aligns with Lukes' point that consensus only arises when the more powerful dominate (Beland, 2006). Managers made decisions about responding to feedback according to an agenda that was dominated by a perspective focussed on expanding the market (Demetrious, 2021, p.5), so it was no wonder many diverse customers with differing access needs failed to be included and an opportunity to collaborate and extend services was missed because there is "no one size to fit all" (Hyland-wood, et. al., 2021, p.7).

Diverse customers, especially people with disability and people from vulnerable and remote communities expected a good service based on their previous experience with Oz Tel and the importance the organisation had placed on political, social and cultural inclusion (Woodhams and Corby, 2007). This focus contrasted with Oz Tel's changed worldview as a for-profit organisation with bottom-line focussed deliverables intended to strategically position them as market leaders (Demetrious, 2013). Success in this strategic move was measured by accessible "digital platforms" for everything, according to the CEO, and was described by staff, stakeholders and shareholders as a strategic win (Oz Tel, 2018). Inclusion was still part of the organisation's agenda, but success was measured differently. Oz Tel considered the provision of digital platforms and specific variations the measure of success but diverse customers measured success by having services that worked for them. Unconventional views are unintentionally silenced in favour of the organisation's norms of practice (Be, 2012, Shildrik, 2012, Davis, 2013).

Diverse customers found they lacked power in their interactions with Oz Tel. They were unable to give the feedback they needed to have an appropriate level of service and be included in the same way as other customers (Vardeman-Winter et., al. 2014). Lukes describes this process as selective listening and argues it can lead to oppression because minorities lack the power to be heard, and the scale of exclusion is unknown and misunderstood (Lukes, 1978, 2005, p. 62). This was particularly significant for long-standing customers. These customers felt duped because the support they had received over an extended period had not only changed but in many cases had been withdrawn; a key example was that they could no longer speak with a person in the

organisation when they had been used to connecting with the same person to resolve an issue. The attention to feedback that was not related to new customers or the uptake of new services was easily sidelined (Thill, 2015) because of the way it was collected by "hits and clicks" there was no option for feedback on access processes (Alex, 2018). Diverse customers often had difficulty submitting feedback when it was possible to do so (Campbell in Thill, 2015, p.8) and so most customers, like Nicole, gave up unless it was critical to go to the ombudsman or wait on the telephone, as David did for seven and half hours (2018).

The findings show, however, that it was not only recent changes that led to dissatisfaction for longstanding customers. Malee, a customer of 22 years, had no expectation of service, she did not look for it nor did it bother her that she was unable to have the level of service she needed. She assumed she was unable to access information because of her poor English, being unable to read English or speak English easily, not because the organisation failed to provide the support she needed. Norms of culture were not shared with LOTE customers so the organisation's norms of practice covertly excluded them (Fraser, 2003, Young, 2000 in Dawson, 2018, p. 776). As opposed to customers with disability who expected to have a service that they could engage with because they knew their rights, Malee had no expectation of a better service and no way of knowing it could be improved (Bassel, 2017). Her experience raises questions about whether other non-English speaking LOTE customers faced the same poor level of service, but it is impossible to know because feedback from them was not collected. The "promise of voice" (Dreher, 2012) is unrealised for marginalised communities. Given that senior managers from two divisions said that LOTE customers constituted a market they hoped to expand into, the failure to collect feedback on these customers' poor experiences of service was counterintuitive (Ratcliffe, 2005). The profit motive had reduced their communication potential to a norm of inclusion that was not shared by diverse customers and Oz Tel were unable to see that their capacity to meet their goal of providing inclusive services was affected (Montensano et., al. 2021 p.1).

From a strategic communication perspective, for organisations to include their customers, they need to hear them (Thill, 2015, p.40). Oz Tel's ability to hear was muted by their own needs and they failed to notice that their communication had been unsuccessful for their minorities (Ahmed, 2012). There were several reasons for this. Firstly, they were not collecting feedback to identify issues that prevented engagement because they assumed that by providing specific variations of information diverse customers had access to the services they required (Dawson, 2018, p.774). LOTE customers could apply for variations, as could people with disability, but the application processes were inaccessible, especially to LOTE customers, and staff were unaware of this (Lee et. al, 2021, p.55). Similarly diverse customers were unaware they could have access or a variation because the service was not promoted to them as communication was initiated via mainstream services that diverse customers did not or could not use (Chauhan et. al. 2020, p. 1). The organisation did not collect feedback beyond compliance with the USG and AIP and they missed their chance to improve inclusion (Harrison et. al, 2019, p.1,).

Ratcliffe argues for attention to feedback processes to hear and listen (2005) as essential for organisations to redirect attention from a prioritised agenda. This is particularly important for diverse customers whose voices can be harder to hear, even when they are proficient in English, like Jihun, who even suggested about how to resolve the problem she faced but had nowhere to post it. The findings of this case study showed that the strategic direction underpinned by goals and objectives that could form pathways to support inclusion was ineffective because the problems that prevented inclusion were either unknown or poorly understood (Harrison et. al, 2019, p.1).

Customers, thus, were denied a voice, sometimes quite literally. Having a voice is more than just the process of speaking, it is a form of agency (Couldry, 2010, p. 8). However, for the agency of voice to be realised, that voice needs to be recognised by others. As Dreher (2012) argues, the "other side" of voice is listening, without which voice may

be meaningless. Bickford argues that what she refers to as political listening creates an environment where organisations can recognise diverse voices as a vital part of democratic citizenship to listen to each other's perspectives (1996, p. 70). For listening to occur, institutions need to develop processes that enable their diverse customers to be heard and contesting processes that prevent feedback is essential to identify exclusion. For Dreher, it is the responsibility of the organisation to manage the implementation of inclusion rather than rely on marginalised voices to stand up for themselves (2009). However, the organisation's capacity to listen to their minorities who are outside the organisation's usual process was limited and requiring attention and understanding (Daya, 2014, p.302).

However, there were exceptions. Customers who were aligned with specialist programs and advocacy groups could give feedback as part of their evaluation. Political or institutional listening enables marginalised voices to engage on "their own terms" (Dreher and Mondal 2018, p.10). To some extent, this could be seen as an example of the kind of covert communication that privileges publics with shared norms and greater power (Hallahan, 1999, p. 208).

Staff acknowledged the benefit of collaborating with people with lived experience of disability in the design and delivery of programs, as found with the SMART Home and AFL App. However, here too, the organisation's goals influenced the decisions made. As Daya argues, "inclusion is the outcome of strategically aligned processes" (2014, p.302). This became clear in the outcomes of two telephone apps. The first was an app intended to improve access to AFL (football) games for people with sight impairment, instigated by a sight-impaired customer and the second was the SMART Home app, which was developed through collaboration with people living with disability. The AFL app was of interest to people with sight impairment and while it improved access it did not increase profits. The SMART home app inadvertently met the needs of many different customers. Thus, it was this product that attracted the support needed for broader implementation across Oz Tel as a contributor to profit, whereas the AFL app was easily sidelined by the dominant agenda. This example shows profit-making goals were prioritised to achieve cost savings and goals to include diverse customers were

separate, discrete, and not shared (Townsend et. al, 2020). The support of programs to identify technical solutions and new products gave Oz Tel the chance to take new ideas to market, contingent on a business case. The collaboration with people with disability enabled staff to build relationships with people to inform their communication and improved inclusive processes "as a vital impetus for change" (Edwards, 2018, p.177). Even then, the gains were not formally recognised through evaluation. The opportunity to incorporate the value of relationships to create inclusive processes was missed because the strategic goals failed to measure values of inclusion (Daya, 2014, p.304).

Conclusion

This chapter explored the policy and processes of Oz Tel, in providing inclusive services to diverse publics. The study has shown that, despite a strong reputation for past success in providing inclusive services to diverse customers, and efforts to establish effective services, several structural issues prevent diverse publics from being fully included in the services provided by the organisation. There are four main reasons for this, as set out in the discussion section above. The focus on processes and measures of compliance with legislated requirements, rather than on the needs and expectations of diverse customers led to missed opportunities for inclusion of diverse customers (Daya, 2014, p.304). Oz Tel placed significant emphasis on providing variations in programs for its diverse customers, but lack of consideration for the norms of culture of these customers left them unable to use the programs of services provided for them (Kim, 2001). The organisation had provided access to information and services, but the lack of attention to the real needs of customers rendered them inaccessible (Vardeman-Winter, 2014, Goggin, 2009, Campbell, 2010). The shift in market-orientation to a profit-making organisation led inevitably to a shift in priorities for the organisation, with a focus on gaining new customers, and, as a consequence, opportunities for customers to exercise agency and have a say in the design and evaluation of services and products were limited (Townsend et.al, 2020, p.119). Finally, feedback mechanisms were shown to be ineffectual, either because it was too difficult

for diverse customers to make a complaint or because complaints were not taken

seriously.

Chapter 7

Conclusion

This study has taken a strategic communication approach to analyse the impact of communication policies and processes of organisations seeking to include their diverse publics. In a case study approach, data was collected from three organisations known to offer inclusive services and products to the publics surveyed to identify how their values manifest (ACCAN, 2017) and whether they included the diverse publics they serve. I used an analytical frame of 'norms of practice,' as the rules guiding the organisation and 'norms of culture', as the rules guiding social context to identify inclusion in the three case study organisations, a not-for-profit, Consumer Advocacy Australia, a Government organisation, Metro Council, and a for-profit organisation, Oz Tel. I found that approaches to inclusion varied, and I identified values, relationships and communication processes as indicators of inclusion.

This concluding chapter comprises four sections. The first section identifies the key findings of the study across the three cases. I begin by presenting the centrality of the concepts of norms of culture and norms of culture to the practices of strategic communication. I then set out how organisational values, relationships and communication processes are indicators of inclusion, and importantly, can each lead to exclusion of diverse publics. Mission statements can communicate values of inclusion, but a mismatch in the ways these values are implemented lead to decisions and practices that prevent minority publics from receiving the products and services implied by these public statements. Relationships between the organisation and its staff, advocacy and other community groups and individual clients and customers facilitate the development of familiarity which can lead to shared understandings. Ongoing relationships between the named staff and individual clients and customers support the development of shared norms of culture. Communication processes are impacted by factors such as organisational structure and the goals and objectives of different departments in the organisation, leading to internal conflicts that result in the exclusion of diverse publics. The importance of feedback in communication

processes is reinforced, demonstrating that the lack of opportunity for clients and customers to have a voice deprives organisations of important data that could lead to more inclusive services and products.

This second section documents the contributions the study makes to public communication theory and practice. I consider how this study sheds new light on the use of Habermas's theory of communicative action to understand strategic communication, and the assumptions that its use will lead to a more participatory, democratic engagement for an organisation's diverse publics. I emphasise the significance of feedback as the voice of participants, demonstrating that it must be understood as more than a practical process for collecting data. Feedback is essential to the development of a collaborative relationship between organisations and diverse publics. Finally, I explore the importance of the distinction between norms of culture and norms of practice as a significant contribution to the literature.

The third section describes the implications of the findings for the professional field of strategic communication, with recommendations to re-think the organisation's assumptions about feedback and to extend the use of norms of practice and norms of culture to identify opportunities to improve inclusion for diverse publics. The final section focuses on the implications of the findings of this study on directions for research in the future. This study, which brought together organisations with different market orientations, and which brought together the external focus of the organisation, the perspectives of staff and the experiences of diverse publics, has demonstrated that diverse publics' access to inclusive products and services is a complex topic both conceptually and practically, with many strands that can be explored in future research.

Exemplifying inclusion, practising exclusion

Inclusion is at the heart of this study. This section brings together the ways that the three organisations in this study expressed the importance of inclusion and enacted it. Based on the findings across the three cases, it will show the strengths and weaknesses in the policies and practices under the three themes of values,

relationships and processes. These emerged through the conceptual lens of norms of practice and norms of culture as an analytical tool, that demonstrates how information is shared between organisations and their diverse publics. Across the three case studies, a strategic communication framework permitted diverse publics to engage when the organisation's norms of practice were known and publics' norms of culture were shared.

The application of norms of practice, as the organisation's process of operation, and norms of culture, as shared understanding between people (Kim, 2001, p.143) as an analytic framework identified three levels at which these norms influence the work of organisations and their relationships with their publics. They are *values, relationships and processes.* An unexpected finding of the study was that all three organisations held very similar values of inclusion. Nevertheless, a closer inspection of their internal operations via relationships and processes found the three organisations were somewhat distinct. This finding is significant because values statements are the most visible part of organisations, and, by only looking at this level, one might conclude that organisations have made great progress. Further investigations into what was underneath the public statements showed what really counted.

The Importance of Norms of Culture and Norms of Practice

Norms of culture and norms of practice have been used as analytical tools to draw out key findings across the three case studies. In this study, the phrase 'norms of culture' is used in the context of the diverse publics who are the members, customers and clients of organisations (Holliday, 1999, p. 240). This study uses the phrase 'norms of practice' in the organisational context, although the phrase 'norms of culture' is also used in the literature (Schein, 1985). However, it is important to keep in mind, as will be argued below in the section on contributions to the literature, that norms of culture and norms of practice emerge as significant concepts in this study, going beyond their usefulness as analytical tools.

Culture is labelled as the collective experiences of people who share communication to varying degrees and self-identify with a common alignment to a national, ethnic,

ability, gender or geographic group that distinguishes them (Kim, 2001, p140, Williams, 1983, p.87). Organisations attempt to connect with multiple publics, many of whom do not share the norms of the organisation, and thus are challenged by different and unfamiliar expectations. Understanding that culture differs and is not always shared is essential to seeking out and identifying misunderstandings (Kalowski, 1996). This study found that organisations can assume that by having specific policies designed to engage their culturally diverse publics they achieve the inclusion they had intended. However, engagement is often at a superficial level if at all and therefore inclusion is not achieved. The organisational process ticks a box, but it is not enough to truly include the range of culturally diverse publics (Habermas, 1998, Davis, 2006, 2013).

A strategic communication process that reflects the lived experience of publics across the organisation is essential to maximise inclusion, but difficult to achieve when norms of culture are not shared. Feedback from people with lived experience of diversity identifies ways to improve engagement and address gaps in service but, because norms are covert, this feedback can be missed or misunderstood. Publics and staff prefer to make assumptions rather than reveal they have misunderstood (Daoust et. al, 2021, p.316) and this can lead to a more complex level of misunderstanding that is harder to resolve while maintaining dignity between parties (Hage, 1997). Ultimately information is not fully shared and the need for services and products may not be addressed because the organisation's norms of practice may not recognise cultural aspects that prevent someone receiving the full range of services they are entitled to.

Inclusion is achieved when an organisation's norms of practice, as reflected in their vision, mission and values statements, are applied by staff to engage their diverse publics. These statements underpin the organisation's operation and permeate the business goals and objectives to mark their success. The communication processes come to reflect the organisation's norms of practice to 'describe the way they do things' and are embedded in all their communication processes to demonstrate what is valued and what is not (Levitas, 2004 in Dawson, 2018, p. 775). Communicators must know the organisation's system of engagement and how to use it strategically to connect with their diverse publics if the intention is inclusion (Hallahan et. al, 2007).

Norms of practice connect people through a shorthand that covertly enables understanding and simultaneously disconnects when not shared (Davis, 2013). A disconnect is more likely when communicating with diverse publics across culture because norms can differ and people can be unaware (Kim, 2001, Davis, 2006, 2013). Given the unstated nature of the impact of norms, assumptions are made about communication in the exchange and ideas are often patched together based a perception of what is important. However, the perception can differ from the organisation's intent, for example, to include or to maximise profits. Misunderstanding easily occurs because participants assume understanding has been achieved and as there is no need to qualify meaning, it is assumed understanding has been shared. The dominant culture can inadvertently marginalise diverse publics, by selectively listening to information they are more familiar with, unaware they have filtered the information to suit their own agenda and in doing so prevented inclusion.

A norms of culture/norms of practice framework enables scholars to analyse organisational practices by observing interactions within an active mediated public sphere, by identifying power relations and the manifestation of bias. This approach moves the focus from an analysis of the day to day operations of the organisation. This in turn enables a critique of an organisation's position within society, identifying covert processes that impact the ability to include publics with different norms. By taking a helicopter view position we can observe the effect of norms of practice that may not otherwise be identified: the effect of norms that are covert, individual or organisational and biased are only identified when the experiences of members of marginalised publics are included in the investigation.

Values

Contemporary Australian society values fairness, equality and opportunity (Australian Government, Home Affairs, Social Cohesion Report, 2021). The organisations in my study expressed their commitment to such values in their external facing vision and mission statements. For all three organisations, the statements position them as complying with societal expectations, having a particular agenda to improve

engagement with diverse publics and as holding specialist expertise. The positioning sets them apart from other organisations in their sector and they became a drawcard for minority publics. The value statements of the organisations describe successful inclusion, which was explored in this study at three levels: Externally to meet anti-discrimination legislation and societal expectations of inclusion, internally according to the organisational policy frameworks to meet their goals, and by customer feedback to describe whether expectations were met. The findings of the study showed that although organisations claimed alignment with values of inclusion, their capacity to assess compliance with these values was limited to the strategic frameworks they adopted and thus a mismatch occurred between the statement of values and the experiences of diverse publics.

The case studies included in this study demonstrate this mismatch arose in the implementation of these values. The Telecommunication Act 1999 (TA), Local Government Act 1993 (LGA) and Telecommunication Information Ombudsman (TIO) outline compliance criteria reflective of societal expectations of inclusion, as do the *Disability Discrimination Act (1992)* and the *Racial Discrimination Act (1975)*. Within the organisations, staff measured their implementation of the values of inclusion against the specific policies they adopted, including Access and Inclusion Plans (AIP), the Universal Service Guarantee (USG), Community Engagement Strategies (CES), and by their efforts in upskilling staff, as well as proactively surveying their community to extend advocacy work and identify issues raised. Their strategic communication ensured that customers' feedback was collected at product touch points, for example, via a customer wellbeing survey (CWBS), and by feedback from consumers and advocacy groups the organisations had identified as important to hear from. However, these measures did not necessarily report on the ways customers experienced these values. The annual reports described successful engagement and gaps were highlighted for attention the following year. This process masked the immediate experience of customers who did not always experience values of inclusion, either because their needs were not included in the organisation's policy or process or because the organisations were unaware that the needs and expectations were not met because of the inadequate feedback processes that were in place.

All the organisations reviewed described themselves as having a focus on inclusion and as noted above, many of their customers had selected them because of that reputation. However, the values were not always reflected in the goals and policies of the organisation. Alignment between the organisation's vision, mission, and values, where a commitment to inclusion is expressed, and business goals, where financial viability is measured, was found to be essential for successful inclusion of diverse publics. However, this was rarely achieved. One reason was that the organisational structure prioritised business goals over values of inclusion as Townsend (2020) found, and the business goals, which were related directly to KPIs, were easier to report success against. Lencioni's argument that organisational values are empty statements merely reflective of public sentiment, not something to be mapped and reported against (2002, p.113) is relevant here. However, given that one of the organisations, Oz Tel, had been in a period of transition may offer some hope for the future.

 A robust organisational structure to formally report success is essential, as reliance on ad hoc reporting by staff is ineffective (Daya, 2014, p.302). The structures in two of the organisations were not robust. Metro Council and Oz Tel managed most programs through their marketing division but inclusive programs for their diverse publics were provided under their Sustainability Division. As a result, success was measured and reported differently. This was particularly striking in the Oz Tel case. Here, inclusion was measured against Corporate Social Responsibility criteria reported in the Sustainability Division section of the Annual Report; sales were reported under the Marketing Division to describe profit making success in this section of the Annual Report. The separation demonstrated that the organisation had established a process to achieve their goals but not to measure the achievement of their values (Grainger-Brown and Malekpour, 2019, p.15). By positioning their programs this way the programs became discrete, and their aims were not integrated. The information about products and services for diverse publics was not circulated to all the staff in the Marketing Division who dealt with customers, it was only circulated to staff who dealt with customers under their specialist programs (Halualani et. al, 2009, p.26). Thus, staff were unaware of the range of services offered; they were not only unable to provide appropriate services when these were requested by customers, they were

unable to identify gaps in processes and suggest improvements. Similarly, Metro Council took advice from feedback given by an annual survey and advisory groups on services offered but they were limited to engaged customers and the changes took time to remedy with many customers giving up waiting. Metro Council and Oz Tel measured success against product sales and engagement touch points. The goals for diverse customer access were not designed to reflect the strategic communication structure and measure the extent to which customers with disability or from a NESB found the programs effective. This led to the customers of these organisations being disappointed that the reputation which had drawn them to the organisation was not substantiated in the processes through which they engaged with the organisation. On the other hand, Consumer Advocacy Australia, being a much smaller organisation, did not have multiple divisions, and had aligned and embedded their values in the business goals. They designed markers against which to report successful engagement that were inclusive and effective for both the business goals and organisational values.

Organisations' reputation for inclusive service created expectations among diverse publics that they would be provided with the products appropriate for their needs, but the goodwill expressed by some of the customers interviewed turned to complaints when they found the values of inclusion offered were not achieved in practice. This study demonstrates, counter to findings reported in the literature, that customers were unable to access the organisation and give feedback on inadequate service. This finding mirrors that of Sison who was excluded because her communication style differed, (2016, p.39) and Hyland-Wood et. al, who found a lack of trust blocked engagement (2021, p.3). The organisations' strategic communication processes had a significant bearing on the implementation of values in the organisation. In the case of Oz Tel, the very process set up to ensure a focus on their diverse publics actually prevented these publics from having access to the services and products they had wanted, because they were defined as different from mainstream customers. The separation isolated diverse customers from their mainstream engagement practices and it prevented staff sharing the variations of products and services for all customers to access. Similarly, Metro Council's communication structure hampered their ability to include their diverse customers in the way they wanted. They had established

numerous processes that were specific to programs or diverse publics but they were not linked or shared to all staff so these publics were unable to achieve the comprehensive level of inclusion expressed in the organisation's mission statement (Harrison et. al., 2019, p.8). Further, when diverse customers did attempt to complain, either there was no way for them to make a complaint because the process was inaccessible to them or the complaints process was bureaucratic and feedback was not immediate. This demonstrated the importance of training; because general staff were not trained and/or did not have access to information to be able to make an appropriate response, there was an over-reliance on the small number of specialist staff.

The organisations' values were implemented through shared norms of practice that most diverse customers did not share and this gap led to them becoming marginalised. Successful engagement relied on organisations strategically embedding values of inclusion in their goals and objectives and reporting success against them. Compliance measures set the agenda to improve access and engagement with diverse publics. The compliance framework that was set by the DDA, (1992) and RDA, (1975) was clear and each organisation adopted it into their particular framework. However, the compliance frameworks were not extended to include minority publics not covered by the DDA and RDA frameworks. Organisations assumed that because they measured success against compliance criteria, this meant they operated to a culture of inclusion. However, the focus for data collection was limited to the specific minority publics they identified for access, rather than the full range of minorities who used their products and services. In particular, representatives of advocacy groups and peak bodies were more likely to receive appropriate inclusive service for their members because they were part of a compliance structure. This was particularly obvious for NESB customers because no compliance process was applied to measure their success.

The organisations' values of inclusion that featured in marketing materials were lauded in interviews with managers but were not embedded in the communication processes the organisations used to engage their publics. The failure to embed these values had two significant effects. Firstly, it disadvantaged diverse publics because the

organisation reported against values of inclusion and they assumed these were achieved because they had no feedback to indicate otherwise. They did not recognise that many diverse customers were not part of the specialist stream. Secondly, the access process for diverse publics was separate in two of the organisations and engagement was limited to measures aligned with their specialist access programs. The specialist stream was added on, not part of the mainstream feedback process, and it was not afforded the same attention to review or resourcing to address issues. The values of inclusion that were promoted were absent for non-specialist stream publics because managers assumed the specialist division attended to all diverse customer needs.

No one reported gaps when values of inclusion were not realised because there was no process for these customers to provide feedback. Inclusive values were a major marketing tool that was promoted widely to all publics but the strategic communication process in place to enact it was ineffective for the diverse customers they argued were their focus. Thus, this study showed the consequence of the breakdown in consistency of values underpinning an organisation's strategic communication, especially when the statements of vision and values, focused on compliance with legislation and societal expectations, are not reflected in the communication processes available to customers and clients.

Relationships

Successful engagement between organisations and their members, clients or customers is dependent on staff having a good relationship with diverse publics to identify and fulfill their needs for access to products and services. Further, organisations implement policies and goals through relationships among and between staff across the organisation. Gaps or weaknesses in these relationships will lead to breakdowns in strategic communication and may result in a failure to meet the values of inclusion expressed in the organisations' mission or goals.

Strong relationships require shared norms of culture, or a strong strategic communication program to identify significant norms of culture relevant to a diverse public. My research showed that across the three case studies, and regardless of organisations' stated commitment to inclusion, shared norms of culture improved access to products and services for diverse publics but a lack of shared norms of culture led to covert exclusion.

Organisations' lack of familiarity with norms of culture of diverse publics, and their consequent inability to establish strong relationships with them, arose for three reasons. Firstly, many managers were unfamiliar with the specific needs of some of their customers, and therefore were ill-equipped to support them effectively. Some staff were familiar with the norms of culture because they self-identified as being a member of the public, had personal contacts, or were part of advocacy groups and peak bodies. Their advice, and the advice from a few targeted customers, sometimes led to strengthened relationships with diverse publics, especially through improved access to products and services. The organisation's communication processes varied and if the structure of engagement failed to promote awareness through existing connections, then inclusion of diverse customers could fail.

Secondly, the findings of the study show that the relationships created with customers with disability were stronger and deeper than those created with customers from a NESB. All three organisations had had formalised relationships with NGOs and peak bodies concerned with disability for a number of years, and they turned to these in developing plans for new products and services. Customers with disability who found that an organisation did not provide an appropriate level of service also called on these peak organisations to lobby for improved services and products on their behalf. However, no such relationships were noted with organisations aligned with NESB customers. This made it almost impossible for the organisations to understand norms of culture around communication for people less comfortable with written and spoken English.

Thirdly, the study showed that organisations did not use the range of strategic communication processes that might have established the kind of relationship of service that would have identified the cultural norms of their diverse publics. Specifically, they had not established channels to collect feedback on the experiences of their diverse publics with the products and services they provided. Although two organisations made different assumptions, leading to lack of understanding of the norms of culture of their NESB customers, the result was the same. The findings demonstrate how Oz Tel was blinkered by the ethnocentric perspective of management, whereas in Metro Council, management were blinkered by societal expectations that multiculturalism allowed for what they referred to as CALD customers to be included as part of the mainstream, so they were not stigmatised, but the positioning prevented them receiving the attention they needed to be included. Consumer Advocacy Australia, however, showed how a strategic communication approach was directed at identifying norms of culture, by seeking the feedback from clients that identified what they needed to be included.

The study demonstrated that without access to lived experience, without input from the voice and expertise of a lobby group or without an appropriate strategic communication plan that specifically sought feedback from members of the minority publics, there was no possibility of sharing or understanding norms of culture, and it was inevitable that organisations would be hampered in their intention of providing inclusive services and products.

Relationships with diverse publics followed a formal process to inform communication and improve engagement but the process masked the potential to expand engagement that existed informally with staff and customers with lived experience of diversity. Norms of practice established processes that met the organisation's need and norms of culture improved engagement for diverse publics. However, the engagement process was ineffective because it was not formalised by the organisation and the lack of process affected all diverse customers and, in particular, NESB customers who assumed they had no right to inclusion.

Processes

A strategic communication approach is reliant on effective communication processes that promote access and empower diverse publics to engage so they can be included in their operation. This study found three key points affected the organisation's ability to engage: (1) the organisation's goals and objectives to direct engagement, (2) empowering diverse publics to give feedback on inclusion and (3) establishing a process to identify norms of culture to develop communication processes to incorporate with the organisation's norms of practice.

The organisation's goals and objectives

The communication processes adopted by an organisation and the way they were implemented was influenced by the organisation's business type as not-for-profit, government or for-profit. These processes were part of their norms of practice and an important measure of their success. Meanwhile, the ability of diverse publics to engage was based on their understanding of the organisation's norms of practice. Where norms of culture were not shared, however, diverse publics relied on their own norms of culture being embedded in organisational processes for them to be included.

The practices of developing long-term relationships, for example with advocacy groups, inadvertently directed attention away from inclusion of individuals. The focus on groups was an efficient way of obtaining feedback against the organisation's goals but it failed to acknowledge individual experiences that might differ and be just as worthy of attention. Feedback by the group was amplified because the full range of feedback was limited according to the communication structure as directed by the organisation's goals and reflective of the business sector. That is, feedback in the for-profit organisation focussed on sales, the not-for-profit extended collection more broadly to build relationships and the government organisation was concerned with equity and set up advocacy groups that represented the most active, not the most excluded, as was the goal. The feedback system led to staff making decisions about following up the feedback they received, and not recognising the shortcomings of the content. At the level of practices, the separation of attention to diverse publics from

the organisations' mainstream publics in the Metro Council and Oz Tel exacerbated problems achieving their inclusion because feedback focussed on business goals not the processes needed by their diverse publics.

The organisation's business goals became the framework to underpin communication processes to achieve their agenda because viability of the organisation took precedence over inclusion of diverse publics. Goals of profit making, relationship building or advocacy for citizens were easier to report progress against because evaluative processes were in place and well recognised. Financial viability took precedence over inclusion because inclusion and support for diverse publics were not always articulated as a goal that the organisation needed to resource and achieve. For example, people with disability experienced this firsthand in Metro Council when issues raised by an advocacy group on behalf of its members were sidelined by proposals presented by the Chamber of Commerce on behalf of local business. The organisation's agenda to remain financially viable and maintain certain relationships privileged the voices of stakeholders who shared norms of practice and the concerns of people with disability were set aside even though their needs were demonstrated as meeting the criteria legislated in the DDA (1992).

Direct engagement with people with lived experience improved the ability of all three organisations to engage with their diverse customers, for example, through community grant systems or by establishing partnerships with organisations. Collaboration improved the organisations' ability to engage more effectively because the parties involved learnt from one another, sharing expertise and norms of practice. Metro Council and Consumer Advocacy Australia's grant process was open to all publics to apply for a small grant to address an access need. By applying, community groups were able to raise their issue with the organisation as important to address for their community. The grant system dually benefited diverse customers' service needs by providing a resource that they developed by and for themselves to improve their own access and the process enabled the organisation to engage with a group that was traditionally harder to reach. The grant processes led to collaboration that supported and empowered communities to resolve their own issue in culturally appropriate ways

and promote the resolution directly to the organisation. Consumer Advocacy Australia took engagement a step further and strategically promoted these experiences as case studies in their quarterly newsletter to increase awareness more broadly among their members. The unofficial endorsement created relationships with groups in the community and, in the longer term, it enhanced the organisations' credibility in their field. However, the application process was only open to publics with the skills to apply, so many diverse publics missed the opportunity because they were unable to work according to the organisations' norms of practice.

A different form of direct engagement with diverse publics was important to Oz Tel. They developed a partnership process that was more strategic in that they purposely sought partnerships in areas they had identified to build their business rather than focussing on diverse publics' issues of inclusion. The Oz Tel partnerships worked with people with lived experience of disability and NESB to design processes to meet their needs, but the aim was to develop a business case to turn a profit. The AFL App was designed with and for a particular customer group, as was the SMART Home Phone App, but the SMART Home Phone App was later found to benefit multiple publics. Consequently, the SMART Home Phone App attracted more extensive support as its potential to increase sales was identified, something the AFL App was unable to do as its focus was improving access for existing customers. Oz Tel's strategic direction was reflected by the partnerships they supported, making it hard for diverse publics to be included in this agenda-setting process unless they had a strong business case.

Empowering diverse publics to give feedback

Feedback provided diverse customers a way of conveying their access needs to the organisation but the processes, so fundamental to strategic communication, were not effective. Members, customers and clients were not always aware a process was available for them to submit comments and when they did, there was no guarantee they were taken into account in decision making. An effective feedback process is critical to a strategic communication process because it provides a channel for publics to communicate with the organisation and gives organisations a chance to listen to

their needs. The value attributed to the feedback process varied across the three organisations and affected the way it was embedded. For example, Consumer Advocacy Australia members were "asked what they needed" to be included and the organisation provided it (NFP, 2018); Metro Council collected feedback annually by a survey but it was a less effective channel for them to communicate because the response rate was low and while publics could provide immediate feedback online, the process was inaccessible for many members of diverse publics. Oz Tel customers who were unable to give feedback on the problems they experienced because the process was limited to product sales, used cumbersome and often ineffectual work-arounds to convey their needs for products and services. The process left them feeling disgruntled and unsatisfied with the organisation. More significantly, some NESB customers blamed themselves because they did not read or speak English well enough to meet the organisation's requirements and because of this, they did not expect to be included. The extra effort required to achieve the inclusive service they were entitled to became a deterrent in this context.

It was not that the organisations did not set up feedback processes; they often established multiple feedback processes that were linked to their business goals, but they failed to ensure that their diverse customers were familiar with how to engage in these processes. For example, Metro Council hosted regular meetings that were designed to empower any members of the community to stand up and have a say, but few people held the capacity to publicly put forward their concerns in the manner the organisation had established. The organisation assumed the process was open to all but, in this study, customers described feeling intimidated speaking in such a forum. These customers were unfamiliar with the protocols required to engage and NESB customers had difficulty conveying their point in another language, a situation that staff were unaware of.

The organisation had established a communication process that favoured engagement with people who shared their norms of practice; these individuals, but only these, could speak and be listened to. Staff across Metro Council and Oz Tel were unaware that other clients or customers did not recognise these norms of practice and

therefore were unable to participate. Some managers assumed the process they had established was effective because it had been designed with input from people with lived experience, but the capacity of staff to elicit and interpret feedback was limited by the skills of staff and the processes they used. The structures limited the organisations' capacity to provide inclusive products and services to meet the needs of these diverse publics. Feedback improved engagement when diverse publics were able to give feedback that was listened to and adopted to address their needs, as many did when collaborating with people with lived experience. As an example, Consumer Advocacy Australia used voice activated software that learnt from the user and enabled them to share information about their experience in the form the user could engage with. However, where an organisation's strategic communication process failed to recognise that norms of practice were not shared, their capacity to empower people to speak up was affected, resulting in diverse publics being excluded.

Covert Norms Facilitating Exclusion

The strategic communication framework uses norms of practice to connect with the organisation's publics by understanding their norms of culture. These norms of practice emphasise the organisation's culture of inclusion through their values as the framework to underpin communication processes, unite staff and promote themselves to their publics. However, the strategic communication process can marginalise diverse publics when norms are not shared and the organisation is unaware. This experience was identified when Oz Tel adopted an automated telephone system to meet their service goals and reduce costs. However, this system excluded customers with accents, unlike the system implemented by Consumer Advocacy Australia. The organisation's norms of practice did not allow for publics that did not share these norms of practice to engage, nor did they collect feedback to identify the issue. The barriers faced by diverse publics were invisible to the organisation but significant for their diverse publics. It was unsurprising they felt let down and excluded.

Norms of practice are taken for granted and implicit, as noted above. There was no mechanism to draw attention to them except recognition that misunderstanding has

occurred when not shared. Norms shape engagement through shared meaning. Thus, norms of practice covertly affected inclusion of diverse publics in all three case studies. The extent of exclusion was unknown because organisations were unaware of the significant effect their norms of practice had on their communication processes.

Metro Council staff assumed they met their mission of inclusion because citizens from diverse publics were engaged with the organisation and they expected that was sufficient. Metro Council had not considered their engagement was limited because they were unaware that their ethnocentric perspective had an impact on their ability to recognise the barriers diverse customers faced. Staff assumed that understanding was achieved when it was not. Input from people with lived experience helped shape engagement, but it was embedded in a framework to meet the organisation's needs, not their customers'. Successful inclusion required diverse customers' norms of culture to be applied to the organisation's norms of practice for inclusion to follow.

The gap between the organisation's norms of practice and their publics' norms of culture was most prominent in Oz Tel because their goals had changed over time and their services and staff numbers had been reduced. The organisation was no longer able to provide the service customers were familiar with. The change affected the organisation's norms of practice as they adapted to new priorities and it changed the way they operated. The staff profile also changed and comprised a mix of new staff located offshore, and old and new staff located onshore. As a result, staff across the organisation did not share organisational norms of practice as new staff learnt the protocols and older staff adjusted to new processes. Knowledge and skills held by staff varied so it was unsurprising that advice to customers varied. Customers expressed anger at not having the service they expected, given the organisation's marketing messages of inclusion. Many customers with disability found themselves briefing staff and referring to Australian anti-discrimination laws because these staff were not informed about the rights of people with disability. Offshore staff members had limited information about variations of products and processes for diverse customers and they were regularly named as ineffective by customers with disability.

Norms of culture masked misunderstanding and affected norms of practice because assumptions were made that the exchange was effective. This was very clear in the third case. Oz Tel customers described their telephone call being hung up when offshore staff were unable to resolve an issue because they had no way to fix the problem and nowhere to refer customers that was accessible for them, and some customers blamed the organisation for poorly preparing their staff. Norms of practice were not shared by staff across countries and it affected their ability to engage with customers in Australia. Oz Tel's goal of cost cutting affected their ability to include their diverse customers and their offshore staff were most affected because they did not share norms to support inclusion, regardless of their willingness to comply. Diverse publics were marginalised because the cost cutting systems installed to maintain financial viability did not recognise the inclusive values espoused by the organisation.

Norms of culture affected norms of practice when not shared by participants because there was no process to identify them unless the organisation worked in a truly collaborative mode with people with lived experience of difference. The communication process was biased because norms of practice are invisible when shared and exclusion was only identified when diverse publics were empowered to speak up.

Contributions of this study

This study has made four contributions to the literature. Firstly, it draws on literature from four areas, demonstrating the importance of bringing a variety of perspectives to bear on a complex issue, the provision of services and products for the inclusion of diverse publics, which has conceptual and practical implications. Secondly, the study indicates that Habermas' communicative action theory cannot stand alone in theorising inclusive practice but must be extended by purposive action theory to strategically identify access to engage diverse publics. Thirdly, the study has shown the importance of norms of culture and norms of practice as distinct concepts, drawing on the work of Holliday (1999) and of Schein (1985) to clarify this distinction. Finally, the study demonstrates the importance of a conceptual understanding of feedback in an

exploration of inclusion, going beyond the practices of voice and listening as the processes of communication between the organisation and their diverse publics to focus on relationship development and collaboration with people with lived experience.

The investigation of the the impact of communication policy and processes in organisations seeking to include diverse publics identified the importance of drawing on a wide range of literature to analyse the complex issue of inclusion for diverse publics, reflective of the multiple ways they engage and their limited offers to engage. The value of a conceptual framework that embraces multiple lenses extends thinking to identify new ways of understanding and reduce bias that inherently occurs from taking a view from a single field of study. As Shildrik (2012) argues, embracing multiple perspectives can avoid silencing unconventional forms of engagement. Thus, this study draws on multiple literatures to identify practical applications for a range of publics, organisations and purposes to seek out challenges and remedies to inform the discussion about inclusion and exclusion of publics. By using multiple literatures, this study broadens what is often a narrow view of publics and organisations reflective of "the shape, values and practices of dominant groups, at the expense of the marginalised" (Dawson, 2018, p.772). In particular, I have drawn on literature from across communication studies including voice and listening, access and inclusion; public communication, with a focus on strategic communication; and organisational communication as internal employee communication and external communication to diverse publics. The multiple sources and varied literature created opportunities for unexpected synergies to be identified that extend and expand practical and conceptual knowledge for this particular study and across all of these areas to understand the factors that influence inclusion and can lead to exclusion.

Secondly, this study challenges the adequacy of Habermas's theory of communicative action as an ideology for publics to share information and discuss issues. It has demonstrated that as an ideology, the framework makes ill-founded assumptions about shared norms of culture and practice, and therefore proposes a modification to this framework.

In public communication, communicative action is proposed as an ideal framework to engage with participants in an active mediated public sphere because they can freely exchange views (Calhoun, 2002). Habermas' concept of the open forum offers publics a "dynamic and enriching" place to share ideas and learn from one another, outside of the control of the state (Demetrious 2021, p.6). The interaction enables collaboration through democratic models where communicative spheres of action open relational understanding to achieve social justice principles of inclusion (Habermas, 1994, Demetrious, 2021, p.6). The principles inherent in this idea have been adopted by organisations intent on establishing some level of collaborative relationship with their members, clients and customers through strategic communication.

A critical review of exchanges that occur in an open communication forum, such as a public meeting, exposes the emergence of self-interest, argued to reduce the potential of the exchange to create a public minded rationale to achieve consensus (Habermas, 1994, p.8). The exchange appears democratic because its intent is to enable participation, but the implicit self-interest of more powerful actors is prioritised at the cost of inclusion for all (Ahmed, 2012). This study has shown how diverse minorities are easily sidelined, even in the open forum of a public meeting and how consensus only arises from the "suppression" of those who lack prominence in the exchange (Lukes, 1978, p. 19). This "suppression" was noted in each of the cases explored here.

I argue that a process is necessary to counter embedded power relations that affect a dialogic exchange when publics are not equally empowered to engage. A strategic communication framework can offer such a process. It can elevate the voices of minorities through narratives constructed purposively to increase their visibility and through 'appearance' to "prompt active, responsive listening" (Edwards, 2016). Communicative action is improved by a strategic communication process because the voices of diverse customers who are on the periphery are brought into spaces where they can be recognised as equally important (Edwards, 2017, p.5). Recognition of minorities through strategic positioning informs change because of a realisation that their voice genuinely matters.

A strategic communication approach, with a focus on purposive action, makes communicative action possible for diverse publics because it focusses on the processes of communication. In particular, it promotes engagement between members of diverse publics and organisations by using the feedback collected to promote processes and change practices that they self-identify with and prevent a "hegemony of normalcy" that blinkers communication and impinges on their ability to be included (Davis, 2013).

Communicative action vies for a negotiated exchange with multiple publics to enable them to have a say when social norms are shared (Habermas 1987). The exchange cannot exist without a process, especially for diverse customers to be heard (Theunissen and Rahman 2011, p.18). This study found that by making explicit the norms of culture of diverse publics, organisations could adapt their processes and improve their organisational norms of practice. The use of strategic communication processes to gather and process feedback provides a way for diverse views to be heard (Theunissen and Rahman, 2011, p.18), as a way to include processes indicating a willingness to listen (Theunissen 2015, p.13).

This study found organisations had a greater focus on 'speaking' to achieve their own goals and by doing so they missed the chance to identify opportunities to collaborate more effectively by 'listening' to their publics. The communication process failed to capture the level of feedback needed to improve processes for diverse customer access. Simultaneously, diverse publics faced dual discrimination: first because of their personal situation and second, because the governing policy did not provide additional opportunities to include them (Faulkner, 2012, p. 17). At a societal level, this becomes significant because social exclusion limits the application of human rights and creates discrimination (Triggs, 2013). Few diverse publics held the agency they needed to speak up and be heard. Power affects people's ability to engage and leads to minorities losing their ability to be included (Barnes, 2012, p.8). Minorities are empowered when the organisation is open to listen to their criticisms (Lee, Li and Tsai 2021, p.54) but a process is needed to create change.

Communicative action is seen as an ethical approach to engagement because publics can collaborate freely when interacting with society rather than arrive at an interaction in an organisation because of goal oriented persuasive techniques that may be part of strategic communication to sway the agenda (Demetrious, 2021, p.6). However, this study found a consequence of not seeking out diverse publics through strategic communication is that these publics are unaware that the organisation has offered an opportunity for engagement and they miss the chance for inclusion.

Thus, a significant contribution of this study becomes apparent. To bolster the strengths of communicative action as an ethical approach for organisations to establish relationships with clients and customers, I propose that, in the context of organisations wanting to engage with diverse publics, adding purposive action to the framework, through the implementation of the processes of strategic communication, provides a conceptual tool that overcomes the assumptions of shared understandings and norms that underpin Habermas's notion of communicative action. This approach aims to chip away at functionalist approaches to inclusion by drawing on a wider field of ideas.

Thirdly, this study has demonstrated the significance of boosting the importance of feedback as a practical process or mechanism and, significantly, treating feedback as a concept, essential to the development of relationships. For publics to be recognised a dialogic relationship is essential for engagement (Taylor and Kent 2014, p.384) but it can be hard to achieve for minorities as it may not be accessible (Murphy, 1991). Achieving a two-way and inclusive communication process has been extensively debated in public communication because access needs vary and scholars argue responsibility lies with the organisation to improve mechanisms (Demetrious, 2021, p.7, Pereira and de Abreu Figueiro, 2020, p.59, Ciszek, 2020, p.5). In line with the findings from these studies, this study identifies the importance of prioritising feedback, which is often positioned as a secondary consideration to access and an underdeveloped element of the dialogic process. Feedback enables managers to gather information on the experience of publics and identify gaps in the promotion of

communication to them and development of an effective communication process for them.

Organisations develop feedback processes to demonstrate success, according to the findings of this study, not to innovate for success, and by doing so they miss the chance to identify communication opportunities. As found in other studies, the feedback process has been established to report against organisational goals (e.g. Montesano et. al, 2021, p.1). As demonstrated in this study, this limits an organisation's potential to "listen with the idea of debating and being exposed to different ideas and values", according to Marotta (2000, p. 205), who draws on the work of Dewey (1997) to reinforce the relationship between public communication and democratic theory.

A broader application of the feedback process is suggested by this study, to link with values of inclusion by establishing feedback processes that go beyond collecting data on financial viability. Such an approach to measuring inclusive values is supported by the International Integrated Reporting Framework (IIRF, 2013 p. 4) and the international Association of Measurement Evaluation of Communication (AMEC, 2021). These frameworks are recognised for their approach to measuring success by extending the focus to intangibles of reputation and relationships, argued to account for more than 80 per cent of the market value of public companies (Ocean Tomo, 2015). The link between financial, relational, social, or other intangibles was missing from the Metro Council and Oz Tel case studies and contributed to a "fragmented approach to evaluation", also encountered by the Centre for Corporate Reporting (CCR) (Macnamara, 2018, p134). The inconsistency biased financial validity as easy to measure and report on and dismissed measures important to track success for diverse publics.

The findings of this study indicate that establishing an effective feedback process improves the organisation's ability to establish relationships when the outcome of communicative action can be applied to promotional processes that purposely seek to engage with harder to reach diverse publics. By combining a strategic communication

process with a communicative action ideology, organisations can structure an exchange influenced by the feedback from minorities they hope to engage with. At the same time, gathering feedback from minorities builds confidence with staff and customers and affirms the right of customers to be heard (Edwards, 2017, p.11).

Norms of culture and norms of practice are established in this study as significant influences on an organisation's ability to provide services and products that meet the needs and expectations of diverse publics. They also emerge as two separate concepts, rather than as a single concept applied in different contexts. Norms of culture as applied in this study are shown to follow Holliday's concept of 'small cultures' (1999). The key features of this concept are that it is not essentialist and, importantly, it is not subordinate to the norms of other groups so they can share equal status. The phrase 'norms of culture' is also used in the literature to apply to behaviours in organisations, in an approach supported by Schein's early work (1983). However, this study has shown that in an organisational context, norms can be essentialist and that a hierarchy of norms can exist, for example positioning those supporting the financial viability of the organisation over those supporting the provision of services and products to diverse publics.

 The norms of practice of the organisation and the norms of culture of members, clients and customers influence feedback processes. This study has shown that these norms were both beneficial and detrimental to engagement. Firstly, the existence of laws (Racial Discrimination Act, 1975 and Disability Discrimination Act, 1992) improved compliance for the diverse publics of focus, but at the same time the organisation's staff assumed compliance meant an engaged relationship had been established with customers or clients and no further work was required. The misunderstanding was invisible. Publics that were not specifically included in compliance criteria found there was no impetus to engage them because staff action was not supported or rewarded. Linking back to the need to strengthen the concept of communicative action, the recognition of minorities by legal status differed from the entitlements offered by purposive communication (Edwards, 2017, p.9). This was the case with NESB customers in each of the case study organisations. This group was denied the attention

they were promised in mission statements because there was no organisational framework, be it a compliance measure or values of inclusion, against which to evaluate their experiences. While inclusion of diverse publics may still be marked by prejudice, stigma and poor evaluation (Pereira & De Abreu Figueiro, 2020, p.50), this study showed that this is likely to happen because of conflict between the norms of culture of diverse publics and the norms of practice of the organisation.

An organisation's norms of practice explicitly guided communication policies and strategies to reflect their values, and these were applied by staff through formal relationships that were key to inclusion (Pereira and De Abreu Figueiro, 2020, p.49). In this study, these formal relationships were held with several groups, including members of advocacy and peak groups, individuals who were part of formal access programs and people who were active in their community. Many of these relationships were long-term and became mutually rewarding. As Ciszek explained, trust was built as knowledge was shared with people with lived experience of diversity (2020, p.4). The formal structure of collaborations, however, masked exclusion of publics not associated with an advocacy group or individual. This study, like that of Hyland-Wood et al. (2021, p. 7), found that this was particularly problematic for NESB publics. Not only were members of this minority public excluded, but issues with the feedback mechanism meant their needs were not heard, leading the organisation to assume they had the service they needed. Ratcliffe called for greater attention to publics who are harder to hear (2005). The organisation's norms of practice "shape what is taken for granted" (Ahmed, 2012, p.60), as "a given" (2012, p.73), that can prevent the valuing of other voices in the community. The findings of this study showed that the voice of minorities was invisible to organisations unless they were purposely given agency to have a say, a process argued by Edwards to equalise status between people positioned at the centre of society and those on the periphery (Edwards, 2017, p.9). The formal relationships led to exchanges that supported collaboration with customers and clients who shared lived experience and norms of practice with staff in the organisation. However, managers often made assumptions that inclusion had been achieved based on their own worldview, to subsequently find they had misunderstood the norms of culture of the diverse public (Woodhams and Corby, 2007).

This study showed that informal relationships between staff with lived experience of diversity, who shared norms of culture and understanding with other staff and diverse customers, led to relationships that improved engagement, mirroring findings by Chauhan et. al. (2020 p. 22). Relationships developed because they understood each other and that understanding enabled staff to influence the organisation's norms of practice to bring these norms closer to the norms of culture of the diverse public. The process of staff using their lived experience or norms of culture was an unrecognised resource that improved engagement. However, as this process was not recognised by the organisation and staff were acting outside the norms of practice of the organisation, their expertise was not supported by the organisation for what it was and the possibility of using knowledge of norms of culture to influence the organisation's norms of practice was lost. This finding is in line with that of Habersaat et al. (2020) who proposed that a focus on the interactions between staff and minority publics to identify shared norms was useful in modifying processes to improve engagement with minority publics (in Hyland-wood, et. al, 2020, p.6). Norms of culture allowed people who share understanding to engage (Holliday, 1999, p. 248) but because these processes are covert, and taken for granted, the same norms exclude when not shared and the organisation remains unaware of this (Hyland-wood et. al, 2020, p.6). When effective feedback mechanisms are in place, values of inclusion can be seen to be embedded because pathways are in place to share norms of culture but on the other hand, these same mechanisms of inclusion hid the exclusion of publics that did not share culture because the organisation's norms of practice had not been appropriately modified (Holliday, 1999, p.247, Davis, 2006,2013).

The findings of this study demonstrate that organisations were blinkered by their norms of practice (Ahmed, 2012, p.61) and because their feedback processes were ineffective, they were unable to recognise publics held norms of culture that did not connect with the organisation's norms of practice. A key finding of this study is that organisations rely on informal processes to engage with publics who do not share the organisation's norms of practice, clearly demonstrating how exclusion occurs through inadequately developed norms of practice.

Relationships with groups that brought lived experience both strengthened engagement and masked their exclusion. This arose because, as this study has demonstrated, a communicative action approach was inadequate for connecting with diverse publics: an organisation's norms of practice blinkered the worldview and hindered the ability of the organisation to put in place appropriate processes. A key contribution of this study is support for the findings of Lee, Li and Tsai that a long-term relationship with employees is essential for fostering positive and culturally sensitive social interactions among people of different racial backgrounds, because it aims to engage people directly and the relationship improves their capacity to engage with diverse publics (2021, p55). Norms of practice permitted relationships and reinforced shared norms through inherent communication structures but when culture was not shared people were unable to fully understand one another (Kim, 2001, p.143). This study emphasised that personal relationships created by having a named contact person, smoothed problem solving but created angst when that contact person was no longer available. The mismatch occurred because the norms of culture that had sustained the communication processes had not been translated into norms of practice for all the staff in the organisation. Thus, many staff were unable to grasp the problems experienced by the customer from a minority public and therefore were unable to resolve issues.

As has been shown above, formal relationships with groups and organisations were important in establishing norms of practice in an organisation in line with the norms of culture of minority publics. Ciszek found a trusting relationship was most important for diverse publics who had experienced exclusion if they wanted to be included (2020, p6). However, this study has shown that a trusting relationship can be irreparably damaged if those trusting the organisation are not treated with respect. A considerable amount of goodwill was held according to many diverse customers interviewed when they held formal relationships, but it was quickly depleted when they were unable to resolve issues because of the communication processes established by the organisation.

Over time the values of the organisation change to reflect their business goals and the organisation's norms of practice progressively shift. This study has shown how, in one of the organisations, the expectations of long-term customers about the organisation's norms of practice were no longer aligned with the service provision offered as the organisation adjusted to meet profit making goals and introduced new norms of practice. Newer staff had a different understanding of practice, and communication exchanges were unsettling for both minority publics and new staff because the norms of practice had changed and were no longer shared. Because their understanding of the norms differed, neither group was able to understand the actions and expectations of the other.

The problems of establishing shared norms are complicated further when contract staff are used, as in the case of the off-shore call centre staff of Oz Tel. These people were able to operate only according to the norms of practice the organisation had laid out in the training manual, and were not, therefore, able to recognise the implications of the conflict with the norms of culture of customers. The exchange left customers in a dilemma. On the one hand, they felt let down because they were unable to have the service they expected; but on the other hand, they felt awkward about making a complaint because they recognised the issues off-shore staff faced were not dissimilar to the barriers they faced communicating across cultures.

In this study, communication processes were also affected by the structure and size of the organisation, and the employment status and length of staff service, a point not emphasised in existing literature. This is a complex set of factors. The literature suggests that an approach using strategic communication improves information sharing (Men and Bowen 2016); here the structure allowed for connections but also relationship development, because trust enabled staff to collaborate with minority publics who were clients or customers (Lee, Li and Tsai 2021, p38). Where two streams of communication processes are used, one for minority publics and one for the majority, they are intended to complement one another but this study found them to be separate in the larger Metro Council and Oz Tel cases. In the smaller Australian Consumer Advocacy case, the structure supported customers and permitted the

agency they needed to voice their concerns; as a result, the act of being heard led them to understand the organisation's norms of practice (Davis, 2013). The separate processes in the large organisations, such as Metro Council and Oz Tel, appeared to offer greater attention for their diverse customers but by separating them these processes inadvertently limited their diverse customers to one pathway that prevented them from having the access they needed (Holliday, 2010, p.260, Shah, 2004, p.559). My study supports Campbell's point that 'ableism' is at play, privileging one norm as the standard, and masking other norms to create a binary where the more powerful prevails (2009, p.4, Thomas, 1999, p.24). Consequently, diverse publics' access needs and the carefully prepared variations of processes to support them are not shared amongst all staff. Nor, as noted above, were they incorporated into the organisation's norms of practice with the consequent misunderstanding (Shildrick 2012, Be, 2012, Barnes, 2012 Bickford, 1996). The positioning of diverse customers for special treatment should have improved their access but instead it reduced their potential to engage and many were excluded, including, in this study, all NESB customers who were unable to engage using English.

In conclusion, this study argues that a strategic communication approach must precede a communicative action ideology as an effective way to engage diverse publics. The theory of communicative action assumes shared norms and the possibility of arriving at a mutually acceptable outcome. However, from the findings of this study, I have shown that norms can vary, and organisations can misunderstand the needs and expectations of diverse publics. Such a change requires significant conceptual shifts, as identified in this section. The processes that enact an organisations' policies and values are more than means to achieve an end. This study has demonstrated how feedback is more than a mechanism for gathering input on experiences; conceptually, it links closely with the development of relationships and is a significant way for organisations to understand the norms of culture that direct the behaviours and expectations of a diverse public. Another area which will demand some re-thinking is my argument that norms of culture and norms of practice are distinct concepts. Following from that, the incorporation of some aspects of a minority group's norms of culture into the norms of practice of an organisation requires a complex approach to interaction with minority

publics. Based on the establishment of some common ground, this approach demands a willingness on the part of the organisation to make ongoing changes to its norms of practices, as well as to its products and services and an understanding of the importance of trust in the expertise of clients and customers and of staff, as well as in the capacity of the organisation to be responsive to problems that arise in meeting the needs and expectations of diverse publics.

Implications for practice

This study has four significant implications for practice. The importance of feedback in the design of programs that successfully include diverse publics has implications for the use of a strategic communications approach. The need to recognise that communicating for inclusion of diverse publics is a specialist area and has implications for the employment or continuing professional development of staff. The use of a strategic communication approach to complement an over-arching communicative action framework can have an impact on an organisation's performance, without the expenditure of large funds. Finally, the study suggests that programs to include diverse publics run by staff with skills in strategic communication might be more effective if programs of education offered a specialist focus on communicating with diverse publics. Each of these will be elaborated on below.

This study demonstrates the crucial role feedback plays in communication processes to engage diverse publics. It finds that organisations need to understand their diverse publics' communication requirements before designing programs to engage them. By establishing a formal process for gathering and attending to feedback, they overtly address engagement and reduce the opportunity for misunderstanding found in the covert communication processes that derive from absence of feedback and unwarranted assumptions. The findings in this study and analysis of its implications are similar to the conclusions reached by Vardeman-Winter et al (2014, p. 230), who documented the inequitable consequences of the changes communicated about breast screening processes amongst diverse publics. This study supports a recommendation arising from the work of Dreher in the context of empowering

minorities to engage with organisations; she writes that "the promise of voice for marginalised communities without the attention to political and institutional listening may not deliver" (2012, p.161), thus, underlining the need for an effective feedback process. This must not only enable an organisation to 'listen' but also empower diverse publics to engage with the organisation and have their say in the first place.

It is incumbent on the organisation as the more powerful party to develop a formal process to listen to and monitor feedback from their various publics to improve access. This study found that organisational processes further marginalised certain groups, thereby reducing their capacity to act and achieve the agency they need to be included. They were positioned and "perceived differently" and by doing so they "became exceptional, not part of a multiplicity of possibilities" (Shildrik, 2012, p.31). Capturing the feedback from smaller or less obvious diverse publics by consultation is essential for organisations wanting to know how to foster inclusion by empowering them to engage with the organisation (Hyland-wood, et. al, 2021, p.7). When publics were not part of "an interest group", or a target group on whom there was a particular focus, they found it hard to engage with the organisation (Thill and Dreher, 2017, p.6) and staff did not have the skills to understand why and to investigate further.

Staff need specialist skills to understand the norms of culture of diverse publics, to match their expectations and needs with the organisation's mission statement of inclusion and their norms of practice. Specialist communication skills are needed to engage diverse publics because their norms of culture differ and are easily missed or misunderstood if not shared, inadvertently excluding members of this group, even when they make up a significant target group for the services of the organisation. The findings of this study are in line with the findings of Davis, that people outside of a norm can be dismissed (2006, 2013).

Providing services to a minority public is not a role that can be taken by anyone and specialist skills are essential. This study showed that even when a disability or NESB specialist staff member had the skills needed to develop communication processes that enabled their publics to engage with the organisation and make effective use of

the products and services provided, these skills remained as part of shared norms of culture, rather than becoming embedded in the organisation's norms of practice. Dawson called for a "reimagining" of practices that could disrupt norms to improve equity of access (2018, p.284). The findings of this study support this call for change.

A further implication for practice concerns the valuing of diversity. Value is placed on having a diverse workforce but there is little focus on formally sharing cultural expertise through training staff and making explicit the organisation's norms of practice. Expertise is held, but not recognised as part of the knowledge-base of the organisation and therefore not shared across the organisation in any formal sense. These findings are mirrored by Thill, who found that organisations want to have dialogue with the diverse voices of disabled people, but the process offered fails to facilitate an effective exchange (2015). Thus, an organisation needs to have a staff development program that routinely includes sessions on how the organisation's goals and objectives are linked to their value statements of inclusion and can be strategically promoted to include their diverse publics. This study argues for making norms of practice explicit to focus on understanding cultural norms so that diverse publics are not excluded through misunderstood needs and expectations of service.

Effective strategic communication makes a big difference to measures of success in an organisation. This does not necessarily require more funds, but it does require a real focus on communication strategies to promote engagement through active listening and empowerment of the voices of customers and clients to contribute to the process. There is often an assumption that improvements in service and increased measures of success will be costly. However, this study has shown that relatively small changes in processes, especially in the enhancement of a communication process to give diverse publics agency in making their needs and expectations known will lead to significant improvements in identifying issues to remedy and ultimately provide an inclusive service.

Education programs are needed to provide new members of the profession with specialist skills to deal with diverse publics by identifying ways to understand norms of

culture, and to develop familiarity with the workings of organisations. By analysing the organisation's norms of practice, practitioners learn about their impact on communication processes and how to design processes to include. Learning how to access diverse publics and then capture their feedback by empowering them to speak up is essential for practitioners wanting to include them. Recognition that the communication process differs from the mainstream puts the onus on practitioners to develop skills to engage a wider cohort of publics (Lee and Lutz 2005).

Likewise, prior to developing communications strategies, it is essential for practitioners to understand that norms of culture differ and may not be shared between staff and publics. Skills in relationship development are essential for practitioners, but few share the ability to engage with diverse customers or if they do, they do not share skills in developing communication programs. This is a critical skill to learn for practitioners wanting to include diverse publics. Training to build relationships with diverse customers or extend current practices is essential to establish inclusive communication processes. Whereas, practitioners who share culture hold the capacity to improve communication processes for diverse customers because those who share understanding are more likely to have the power to act (Goggin, 2009). All staff need to be empowered through training to develop the skills they need to engage.

Conversely, when the organisation relies on informal processes to engage their diverse customers, the expectations can create a burden because the process is not formally recognised as part of staff work plans, nor is the effort effectively supported because it is not measured or recognised. The communication process is skewed and "consensus arises from the suppression" of those who lack prominence in the exchange, thereby devaluing the needs of diverse publics because their access process is informal (Lukes, 1978, p.19).

Implications for further research

This study identifies a number of research directions for future focus. They include: the relationship between norms of practice and norms of culture for managing diverse public engagement, how organisations create a culture of inclusion, and how

organisations' business sector impacts their strategic direction. Further, the practical aspects of empowering minorities by privileging their voice contrasts with the impact of using advocacy and peak groups alone for feedback and raises questions about who listens to whom and who speaks for whom. Finally, processes for the level of cultural change in organisations that lead to the embedding of values of inclusion need further exploration, as lack of understanding in this area affects an organisation's ability to provide appropriate products and services to diverse publics.

A major finding of this research was identifying the relationship between norms of practice, as the organisation's framework for inclusion, and their publics' norms of culture to understand why many diverse publics were excluded. Further research is needed to identify factors affecting the transformation of norms of culture into the organisation's norms of practice. This study has identified several factors. A public communication approach may establish dialogue when informed by feedback from diverse publics but it is likely to be unsuccessful without that. Among the factors affecting the possibility of dialogue were the structure of the organisation, the lived experience and/or knowledge of staff, the ability of the staff to solve culturally loaded problems, the ability of diverse publics to make their needs or problems known. Other scholars, such as Myers and Hansen (2020, p.150) have identified the need for further research on this issue.

Power relations differentiate between who is heard and who is not (Goggin, 2009) with minorities experiencing the greatest gap (Barnes, 2012, p.8), as the findings of this study demonstrated. Thus, it is clear that not everyone has the agency they need to make their needs and problems known. Further research is called for to identify the power dynamics as diverse publics strive for inclusion.

This study has shown that organisations use the concept of an inclusive culture in their marketing but the process underpinning it is fragmented. This study has shown that problems of inclusion arise in all sectors: NFP, GOV and FPR. These problems are compounded by the strength of the persuasive message provided through an organisation's vision and mission statement. Further research to understand how

aligning principles of inclusive values with practices that achieve the organisation's goals would assist organisations to realise the full potential of their stated goals.

The influence of the organisation's business sector was demonstrated by a solid alignment to their business goals of equity, relationship management and profit making, but overall a neoliberal imperative to survive dominated. The assumption that "markets and growth are inherently positive" needs further investigating given it is not offset by a failure to include "social impacts" (Townsend et.al. 2020, p. 122). Regardless of market sector, the need to remain financially viable is dominant, and further research needs to examine how this affects values of inclusion.

Fundamental to inclusion for diverse publics is their capacity to have a voice and find a pathway to engage when their access needs are listened to. Despite a vast literature on active listening, there is little focus on practical listening processes within organisations. Feedback could be regarded as the strongest measure for achieving inclusion, but it was inadequate for the diverse publics of the organisations in this study. Further research needs to focus on practical applications to support diverse customers who are metaphorically and practically harder to hear. "Shared dialogue" is only open to some and requires work by the organisation to structure the way voice is heard (Thill 2015, p. 40). Organisations often assume that advocacy groups provide a voice for minority groups, but since advocacy groups may present their own institutionalised agenda, a question that arises here is "who do the advocacy groups actually speak for?" This is a question that requires further consideration.

This study has found that diverse publics struggle for inclusion because organisations privilege their own agenda even when they promote themselves as accessible to expand their market. A lens on norms of culture with norms of practice draws attention to communication structures that offer participants an equal exchange. Further research is needed to avoid separate treatment of minorities, given that reductive attention and essentialising occur through ableist processes (Thomas, 1999, p.24, Campbell, 2008, Holliday, 2010, Davis, 2013, Newell, 1996). This research found that working with people with lived experience of diversity created an environment of

learning that built skills and reduced the ambivalence described by staff unfamiliar with engaging with diverse publics. However, a structure to maintain an exchange and apply it more extensively across the entire organisation was absent. Further research to understand why will benefit all organisations and improve inclusion of diverse publics.

This study found that organisations' implicit norms of practice determined how they communicated with their various publics. People who shared these norms of practice were included because they had the capacity to engage with organisations. However, many diverse publics did not share the organisations' norms of practice and they were unable to achieve the service they were promised. Consequentially, they had to find a 'work around' by approaching the organisation multiple times or identifying managers who had previously supported them, to have the service they were entitled to, because their access needs were not addressed. The extra work created a barrier and they described feeling devalued and 'second rate' and it affected their relationship with their organisation.

Organisations were able to realise their stated vision and values and create access for diverse publics when information was shared among all staff and compliance measures were extended. Concurrently, inclusion was only achieved when feedback was collected from diverse publics to inform access and promotional processes.

A benefit of embedding visions and values in goals and objectives was that staff and publics learnt from one another because the feedback loop that reported on success informed processes beyond the organisation's main objective of profit making. Feedback informed policy and processes in all organisations but when its scope was limited to specific publics, many diverse customers were unable to give feedback. This study showed that the most engaged publics were more likely to give feedback because they understood the organisations' norms and processes, and this gave them access. Whereas the most disadvantaged and disengaged remained excluded as their access needs were not known and therefore not addressed. This was particularly the case for the dually disadvantaged, such as NESB people with disability. Likewise, many

staff were unable to benefit from hearing the experiences of their diverse publics to learn about the barriers faced and how they might change their communication to address them. Organisations have their own agenda but unless they are forced to comply with external measures, they only hear what they want to hear. Compliance is important and extending it to include all minorities is essential.

Authentic engagement with diverse publics must go beyond the rhetoric of inclusion described by highly visible vision and mission statements. But it is only achieved by a strategic communication process that identifies norms of culture to achieve engagement. Understanding the link between strategic communication practice and the barriers created by norms of culture not recognised to affect norms of practice, moves the profession away from marketing hyperbole to authentically include.

These insights have value for organisations to implement and for society to consider when designing policies and processes to improve inclusion of diverse publics.

This study found that working with people with lived experience to inform processes and develop relationships improved inclusion for diverse publics when organisations recognised their value and embedded it in their processes.

Diverse minority publics need to be supported to adapt to their service provider organisation's norms of practice by sharing norms of culture with staff with lived experience and have it formally embedded.

Establishing understanding that identifies the effect of norms of culture on norms of practice is a new approach to inclusion for public communicators. An interpretive frame as practitioner and advocate draws out the difference between values of inclusion found in organisational vision and mission statements and authentic engagement identified by feedback from diverse publics. It demonstrates that inclusion is only possible when strategic communication identifies diverse customer needs and works with them by using a communicative action approach to share experiences and build knowledge.

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