Inclusive Communication Guidelines for Emergency Managers

Submission by the Australian Communications Consumer Action Network to the Attorney-General's Department

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About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will activate its broad and diverse membership base to campaign to get a better deal for all communications consumers.

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Introduction

ACCAN welcomes the introduction of the guidelines. We are aware that both Deaf Services Queensland and the Deaf Society of NSW are working on projects to ensure that Deaf people have access to all information and communications in all stages of prevention, preparation, warning updates and relief. We recommend that you contact both organisations to ensure that all organisations are working together rather than duplicating work.

ACCAN's brief is to represent consumers around telecommunications issues, including internet/broadband and broadcasting. This includes working towards guaranteed access to and awareness of emergency management communications. We have therefore, in the main, limited our scope to these issues.

ACCAN has done some previous work on emergency issues for people with a disability. You may be interested in these. Please visit www.accan.org.au and you will find these in 'publications' under 'policy positions' and 'submissions' listed under 'emergency services'.

Response to draft Inclusive Communication Guidelines for Emergency Managers

1. Statistics

ACCAN recommends the inclusion of the latest Australian Bureau of Statistics data, which show that the number of people with disability in Australia is 18.5%[1].

2. Readability

A number of ACCAN's members who are blind or vision-impaired found the matrix difficult or impossible to read. Other members also found it difficult, particularly the lack of a key and the use of either solid or outlined circles. We recommend that a new format be used, which is more accessible to screen magnification and screenreaders as well as to audiences who do not have a background in the disability sector.

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[1]

http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Media%20Release12009?opendocument&tabname=Summary&prodno=4430.0&issue=2009&num=&view=

3. Language

ACCAN recommends the use of 'person-first' language – that is, 'person with a disability' rather than 'disabled person'; 'person who has limited speech' or 'person who is speech-impaired', rather than 'the speech-impaired'.

The only exception may be the Deaf community, which may favour 'Deaf person' rather than 'person who is Deaf' – we recommend discussing this issue directly with Deaf Australia.

Similarly, the term 'person without a disability' is preferred to 'non-disabled' or 'able-bodied'.

We recommend talking to Blind Citizens Australia about which term is preferred – 'low vision' or 'vision-impaired'. We understand that the term 'visually impaired' is inappropriate.

4. Symbols

On pages 20-23, we note the following:

5.1 The symbol shown is in fact the Auslan sign for 'interpreter', not for 'emergency', and not for 'Auslan'. The term 'signed language' should be used in preference to 'signing language'. Auslan is an abbreviation (not an acronym) of Australian Sign Language (note the capitals). ACCAN recommends contacting Deaf Australia directly for information about which symbol should be used in these circumstances.

5.2 The symbol for hearing loop may be inappropriate. Please contact Deafness Forum for a copy of the international symbol for deafness. The accompanying information should also note that portable hearing loops *or FM systems* can travel with the person and that "portable *systems can look like a small receiver the person has around their neck and a transmitter which is held by the person talking."* (Note that FM systems should also be included in the matrix.)

5.3 Please note that not everyone will be familiar with the symbol for open captioning.

There are two types of open captions:

i. Captions broadcast on TV which do not need to be 'turned on' – that is, all viewers can see them, no matter where they are (e.g. home, hospital, hotel, shelter) and whether or not they have access to closed captions. These captions may or may not be created in real time. The accompanying text in the Guidelines should note that TV stations **must** use open captions for **all** emergency information, to ensure that people who are not in their home (or whose reception of closed captions has been damaged due to the emergency) are still able to receive vital information.

ii. Captions used to communicate in meetings, conferences and so on. These are created in real time. This is sometimes called real time captioning, real time transcription or computer aided real-time transcription (CART).

5.4 The first symbol is for 106 Text Emergency – please note that callers press 'AAA', 'FFF', or 'PPP'. It is also worth noting that callers who are Deaf, hearing-impaired or speech-impaired and who do not have access to a TTY can call Triple

Zero via the National Relay Service[2], using internet relay (and in the case of callers with speech impairment, Speak and Listen). It is also likely that people with disability will soon be able to make emergency calls from mobile phones (see Section 6).

5.5   The symbol for (spoken language) 'interpreter' is incorrect – it is correct in the matrix. Please note that this symbol will not be understood by Deaf community members as representing Auslan-English interpreters.

5. Specific requirements

6.1   We recommend the very clear differentiation between people who are Deaf and those who are hearing-impaired, and the use of appropriate language - for example 'How to inform of a pending or current threat to a person who is Deaf or hearing-impaired'.

6.2   Also add in this section: "When directing people, do not shout. Face the person and ensure there is light on your face, and speak at a normal pace. (Rushed speaking will slow down the process by the time you repeat it at a normal pace.) If you are not sure you are being understood, use gesture or write notes using plain English."

Under 'Is assistance required?', add "Care is needed to notify people by looking at them with light on your face, and speaking at a normal pace and volume. Use gesture and/or notes if necessary."

Note too that Deaf people who are unable to use their hands (due to injury, for example) will have difficulty communicating and may be extremely distressed by this.

The information about the use of interpreters (e.g. page 16) needs to be clearer. We recommend contacting the Australian Sign Language Interpreters Association[3]. (You may be interested to know that the World Association of Sign Language Interpreters[4] is also currently developing guidelines about the use of sign language interpreters in emergency situations.)

6.3   For everyone, emergencies are a stressful time. For some people with disability, this stress may affect their ability to control their body to access their devices, and/or to communicate. Asking yes/no questions is a good way to obtain key information quickly in these circumstances (but should not be used all the time).

6.4   People with disability who are in shelters need access to communications. Shelters should maintain access to, for example:

    i. An iPad or similar so that interpersonal communication can be maintained and voice announcements converted into text using real-time captioning[5]

    ii. TTY and fax

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[2] http://www.relayservice.com.au/making-a-call/emergency-calls/
[3] http://www.aslia.com.au/
[4] http://www.wasli.org/default.aspx
[5] http://cms.unimelb.edu.au/studentservices/disability/students/accessing_info/lrc for more information

iii. An iPad or similar so that interpersonal communication can be maintained using a video relay/video interpreting service[6] and so that Deaf people can make and receive calls

iv. A captioned telephone so that hearing-impaired people can make and receive calls[7]

6.5   People with a hearing impairment may benefit from hearing loops. These could be used as an example on page 17, point 4, for instance.

6.6   People with limited or no speech will benefit from communication devices (high or low-tech), alphabet boards (as well as communication boards) and Community Access Cards (which contain symbols, words and pictures).

6.7   There does not appear to be any information about people who are deafblind. This is a growing group and must be included. We recommend that you contact Able Australia or the Australian Deafblind Council for information.

6.8   It should be made extremely clear that all emergency managers who use television or the internet to broadcast emergency information (for example, in a media conference) must take responsibility for booking, briefing and paying Auslan-English interpreters. It is also incumbent on the broadcasting station to ensure that the interpreters are framed within the broadcast.

6.9   Similarly, emergency managers who provide emergency information via the internet must ensure that videos are captioned (and audio described if necessary).

6. Access to emergency calls

An essential part of resilience is an individual's ability to contact emergency services. However, for many people with disability, this is difficult or impossible. Please read the sector's policy position on this for more information[8]. We recommend that these barriers to calling Triple Zero/106 be noted so that emergency personnel understand them.

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[6] http://www.aceinfo.net.au/index.php?option=com_content&view=article&id=5&Itemid=16
[7] http://aceinfo.net.au/index.php?option=com_content&view=article&id=6&Itemid=17
[8] http://accan.org.au/index.php?option=com_content&view=article&id=379:access-for-people-with-disability-to-emergency-calls&catid=82:access-for-all&Itemid=356