

13 October 2020



Government of Western Australia  
Department of Premier and Cabinet  
Office of Digital Government  
via email: [dgov-administrator@dpc.wa.gov.au](mailto:dgov-administrator@dpc.wa.gov.au)

## **Re: Digital Inclusion in Western Australia: A Blueprint for a digitally-inclusive state**

The Australian Communications Consumer Action Network (ACCAN) would like to thank the Office of Digital Government for the opportunity to provide our comments on Digital Inclusion in Western Australia: A Blueprint for a digitally-inclusive state (the Blueprint). We would also like to thank the WA Government for the proactive work that it has done to date to monitor and address telecommunication gaps in remote communities.<sup>1</sup> In addition to our comments outlined below, ACCAN supports the submission made by the Australian Digital Inclusion Alliance (ADIA) to this consultation.

As Australia's peak consumer organisation in the communications sector, ACCAN has been a strong voice for consumers for over 10 years. We are proud to have a wide range of organisations as members, and as valuable contributors to and supporters of our work. Our members include community legal centres, disability advocates, First Nations organisations, financial counsellors, regional, rural and remote organisations, and seniors groups, among others. ACCAN and many of our members are keen to ensure greater levels of digital inclusion across all states and territories, and therefore thank the WA Government for undertaking this work to ensure the benefits of digital inclusion can be experienced by all Western Australians.

### **Alignment with ACCAN's Policy Priorities**

ACCAN agrees with the WA Government's vision for making WA more digitally inclusive, and we support the four strategic priorities of connectivity, affordability, skills and design. Indeed, these priorities align with feedback that ACCAN has long received from our members about access to communications products and services across Australia.<sup>2</sup> This feedback has shaped the development of our policy priorities,<sup>3</sup> many of which relate to the Office of Digital Government's identified strategic priorities.

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<sup>1</sup> As detailed in a forthcoming ACCAN report: Featherstone D (2020) Remote Indigenous Communications Review [in press report], ACCAN, Sydney.

<sup>2</sup> Particularly the challenges experienced in these four areas, as discussed on pages 4-5 of the consultation paper.

<sup>3</sup> Available: <http://accan.org.au/our-work/1641-policy-priorities-2019-20>

One of our policy priorities, for instance, relates to better infrastructure and the need for communications infrastructure to meet the needs of all Australians (including those who are underserved by existing offerings). ACCAN's view is that place-based solutions must be developed to deliver home broadband, fixed voice services, and mobile connectivity in ways that better match the needs of consumers. In addition, future service delivery arrangements must support the best possible outcomes for regional, rural and remote consumers and small businesses.

Another policy focus for ACCAN is increased reliability. This involves ensuring that fast connection times and prompt fault repairs are available to all consumers, and that consumers are adequately compensated if timeframes or appointments are not met. This relates to ACCAN's policy priority around fairness. Consumers can experience considerable harm in the telco market, particularly relating to poor customer service, questionable selling practices, and being treated unfairly by providers. ACCAN's policy focus is on reforms to deliver stronger consumer protections to support more positive consumer outcomes and a fairer telco market. We also aim to provide consumers with information that can help them make communications-related decisions.<sup>4</sup>

Related to the need for a fairer telco market is the need to grow consumer confidence. As outlined in the consultation paper, some consumers may be concerned about their privacy or security online and may not fully understand how their personal information is used online. Consumers may therefore lack the opportunity and confidence to use the internet and may not experience the benefits of being digitally included. In this policy area ACCAN calls for improved privacy protections for consumers in Australia, and for improved measures to protect consumers at times of vulnerability or abuse. We support initiatives to help consumers get online, and our work relating to digital inclusion fits within this area. ACCAN's final two policy priorities – affordable telecommunications for all, and improved accessibility – also speak directly to the strategic priorities identified by the Office of Digital Government. ACCAN and our members have recently undertaken a significant amount of work relating to these two policy priorities. As such, we offer more detail on these two areas below.

### *Affordability*

Connectivity is now essential to so many parts of day to day life. As such, broadband and other forms of connectivity should be available and affordable for all. ACCAN views affordable broadband as a home internet service that enables all members of the community to be online without putting them into financial stress.<sup>5</sup> An affordable internet service would allow all members of the community to be online regardless of personal circumstances. Without affordable broadband the digital divide will likely

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<sup>4</sup> Examples of such information includes ACCAN's recent Talking Telco resources and our Accessible Telecoms website, available <https://accan.org.au/talking-telco> and <https://accessibletelecoms.org.au/>.

<sup>5</sup> ACCAN, 2019. No Australian Left Offline: affordable broadband for all Australians. Available: <https://accan.org.au/files/Affordability/No%20Australian%20Left%20Offline-1.pdf>

exacerbate existing disadvantage and limit the economic and social outcomes of many people across Australia.<sup>6</sup>

As part of our work on affordability, ACCAN developed a policy position entitled ‘No Australian Left Offline’<sup>7</sup> which provides a roadmap to affordable home broadband for all. We would welcome discussions with the Office of Digital Government about this policy position and how to ensure all members of the community have the means to access essential online services.

### *Accessibility*

ACCAN recently developed an ‘Ideal Accessible Communications Roadmap’<sup>8</sup> based on consultation with the disability sector and people with disability in late 2019 to early 2020. We sought feedback on what communications issues were affecting people with disability, what new communications issues may arise for this cohort and what solutions could help address these existing or emerging issues.

The insights ACCAN received as part of this consultation process highlighted that people with disability continue to experience a range of barriers to equitable communications access, resulting in greater digital exclusion.<sup>9</sup> We were told by Roadmap contributors that people with disability do not always have appropriate and affordable access to digital technologies, and that this has flow on effects to all parts of their lives – education, employment, community or social inclusion, civil participation, access to services, and so on.

Contributors to the Roadmap provided feedback that cut across a range of different topics, including the accessibility of telecommunications services and devices, online environments, and audio-visual content; the affordability of communications technologies; and the safety and reliability of communications technologies for people with disability in Australia. In relation to online environments more specifically, Roadmap contributors discussed themes of web accessibility, digital inclusion training, and digital choice.

Roadmap contributors reported that people with disability across Australia continue to experience barriers when accessing websites, online content and services. This leaves people with disability unable to access information and online services (including government services) on an equal basis with others. One way of addressing the inaccessibility of online content and services would be to develop a mechanism to review compliance with web accessibility standards.

Roadmap contributors also stated that it is not uncommon for online content and services to be retrofitted to include accessibility features after the fact, which can result

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<sup>6</sup> Ibid.

<sup>7</sup> Available: <https://accan.org.au/no-australian-left-offline>

<sup>8</sup> Available: <http://accan.org.au/our-work/1765-accessible-comms-roadmap>

<sup>9</sup> This echoes the findings of the latest Australian Digital Inclusion Index which found that people with disability continue to have a lower level of digital inclusion compared to other groups in Australian society. Available here: [https://digitalinclusionindex.org.au/wp-content/uploads/2019/10/TLS\\_ADII\\_Report-2019\\_Final\\_web\\_.pdf](https://digitalinclusionindex.org.au/wp-content/uploads/2019/10/TLS_ADII_Report-2019_Final_web_.pdf)

in clunky and frustrating online environments for people with disability (despite these websites technically meeting certain accessibility criteria). These poor user experiences can further exclude people with disability from certain online content and services, worsening the existing digital divide. One of the key enablers that governments can implement to alleviate much of this digital disability is the adoption of whole-of-government policies for the procurement of accessible information and communication technologies – equipment, software and mandated accessible web content. Procurement and tender processes, as well as other forms of consultation regarding digital inclusion, must be completely accessible to ensure that people with disability can be actively involved in these processes.

Furthermore, as was highlighted by many of the roadmap contributors, involving people with disability in the development, design and delivery of online content and services will assist in growing digital inclusion. Another complementary solution was for people with disability to be involved in the development and delivery of accessible digital inclusion training programs. Peer education was highlighted by some Roadmap contributors as a possible delivery method for this training, acknowledging the value of shared lived experiences and the expertise of people with disability. This could be expanded to include people with disability being invited to upskill government departments or government-funded organisations in accessibility and digital inclusion.

Some members of the disability community have deep knowledge about web accessibility, assistive technologies and inclusive design. This expertise must be appropriately recognised and utilised in the Blueprint and its implementation. This could involve, for instance, a greater focus of accessibility and the experiences of people with disability within each of the priority areas, but particularly in relation to 'design'. All actions undertaken as part of the Blueprint must embed accessibility and inclusion from the very start. This could help to prevent any accessibility retrofitting and would ensure that people with disability (and other people with accessibility needs, such as older people) are appropriately supported and digitally included.

### **Intersectional approach**

Some members of the WA community will experience multiple levels of disadvantage and discrimination which intersect in unique ways. As highlighted by the Australian Digital Inclusion Index,<sup>10</sup> digital inclusion levels relate to a range of economic and social factors. Generally speaking, people with lower levels of income, education and employment are often less digitally included.<sup>11</sup> People over the age of 65, people with disability and First Nations people also have low levels of digital inclusion compared with other cohorts. Given what the Australian Digital Inclusion Index shows about digital inclusion and certain economic and social factors, it is clear that experiencing one or more of these factors will likely affect that person's ability to get (or stay) digitally included. For instance, a young single parent with disability, living in a remote part of

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<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

WA with English as their second language, may encounter a range of complex and intersecting barriers to getting online. These barriers will likely relate to the priority areas identified in the Blueprint, however their experience of getting connected may be further complicated by the intersections of different parts of their identity or circumstance. It is therefore vital that the Blueprint consider these priorities hand in hand, as equally important and mutually reinforcing aims.

It is also important that the Digital Inclusion Working Group mentioned in the Blueprint includes diverse and meaningful representation from across the community. As a starting point, ACCAN recommends the Working Group include representatives from each of the groups identified in the Blueprint as experiencing social or economic disadvantage.<sup>12</sup> As discussed above, some members of the Working Group may be able to speak to their experiences of intersecting disadvantage and discrimination, and how this impacts their relationship with digital technology. An intersectional approach such as this would help ensure the Office of Digital Government's vision of digital inclusion can be fully realised, and that all members of the WA community can confidently and safely enjoy the benefit of digital technologies and services.

### **WA-specific feedback**

In May 2020, ACCAN and NBN Co held a virtual roundtable with community organisations across Western Australia. Based on these discussions with WA-based ACCAN members and community organisations, ACCAN understands that there are still barriers to getting connected to home broadband – particularly for older people, people with disability, people from non-English speaking backgrounds, and members of Aboriginal communities. The reasons given for this lower connection rate include the accessibility of information about broadband or technology in general, isolation and the affordability of connecting. The technology types available in WA, and the differing levels of reliability offered by each technology, were also highlighted as a barrier to getting and staying connected.<sup>13</sup> For instance, some community members informed us that their internet reliability is dramatically affected by the weather, with cyclones impacting satellite services, and rain affecting power supply which can in turn affect their ability to get connected. Other communities in WA have reported that mobile networks have slow speeds and patchy coverage, with congestion common in areas with 3G coverage.<sup>14</sup>

We were also informed that some members of the community, for instance older people, may lack the confidence to engage online, with fears or negative previous experiences preventing some of these people from getting online. In addition, some community members informed ACCAN that higher levels of cultural diversity in WA can create further digital divides between those who have digital access and those

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<sup>12</sup> Including people living on low income, people living in regional and remote communities, Aboriginal communities, older people and people with disability (as listed on pp10-11 of the Blueprint).

<sup>13</sup> Lack of services in very small communities was a common theme raised in the consultation performed for the forthcoming Featherstone report, op cit.

<sup>14</sup> Ibid.

who don't. For instance, recently arrived refugees with limited English literacy may have greater difficulty getting connected due to the complexity of technology services on offer and inaccessible information about these services. This highlights the importance of ensuring that information is communicated in formats and languages that are accessible, jargon-free and easy for the community to understand. ACCAN's Talking Telco resources are a key example of information that is consumer-friendly and available in Easy English,<sup>15</sup> Auslan,<sup>16</sup> and a range of community<sup>17</sup> and First Nations<sup>18</sup> languages. It is vital that information relating to the communications sector and digital inclusion more specifically is available in accessible digital and non-digital formats and community languages at the same time as other publications. Such resources are helpful for the community sector and can support their engagement with people who have diverse experiences, backgrounds, accessibility needs and digital skills.

Feedback with WA community organisations highlighted the importance of libraries and community spaces for people who are unable to afford home internet services. Those we spoke with explained that these spaces can also be useful for more transient members of the WA community. Despite this, it is worth remembering that the WA population is not uniform, and neither are different groups within the broader WA community. For some people unable to afford home internet services, libraries and community spaces will meet their needs and allow them to get online. For others, this will not be appropriate, and they may require different supports or tailored solutions. Furthermore, some WA communities do not have public WiFi available, and in other areas there are internet bandwidth issues via the public WiFi that can restrict the community's use of online services.<sup>19</sup>

Finally, during these discussions a few WA community organisations spoke of the mental health benefits of connectivity, and the impact that being digitally included can have on broader social inclusion and reducing isolation. We were also informed that connectivity could also offer protection against issues such as elder abuse or domestic and family violence. This again highlights the importance of inclusive design and an intersectional approach.

Thank you again for the opportunity to provide feedback on the Blueprint. Please do not hesitate to contact ACCAN should you wish to discuss our feedback in more detail.

Yours sincerely,

Meredith Lea  
Disability Policy Adviser

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<sup>15</sup> Available: <https://accan.org.au/talking-telco/information-in-easy-english>

<sup>16</sup> Available: <https://accan.org.au/talking-telco/information-in-auslan>

<sup>17</sup> Available: <https://accan.org.au/talking-telco/information-in-other-languages>

<sup>18</sup> Available: <https://accan.org.au/talking-telco/information-in-indigenous-language>

<sup>19</sup> Featherstone, 2020 op cit.