

Connecting Us All:

The Role of the National Disability Strategy





Australian Communications Consumer Action Network

(ACCAN)

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1. CONNECTING US ALL: THE ROLE OF THE NATIONAL DISABILITY STRATEGY

The Australian Communications Consumer Action Network (ACCAN) believes that access to information and communication services are an essential tool for all people with disability to be able to participate to the fullest extent possible in Australian society.

Articles 9 and 21 of the United Nations Convention on the Rights of People with Disability articulate the role of communications in making sure that people with disability enjoy human rights, freedoms and respect like other people.

In 2010 information and communication technologies are an integral part of our lives. This trend will continue. As a 10-year blueprint for Governments, the National Disability Strategy needs to incorporate an overarching commitment to inclusive communications and information technologies.

We call for the National Disability Strategy to adopt the following high level principle;

- Acknowledge that affordable access to communication services and information technologies enables economic participation and promotes inclusive communities as well as assisting people to live independently.

ACCAN calls for the National Disability Strategy to commit to the following areas for action:

1. Improve access to preferred information and communication equipment that will enable people with disability to access voice, voice-equivalent or text-to-speech telephony services and the internet and National Broadband Network;

People with disability need to have the right equipment to make a call or browse the internet.

ACCAN is calling for higher awareness and provision of accessible equipment options to be made more readily available for people with disability.

2. Improve available, affordable and accessible communications services for people who are Deaf, or have a speech or hearing impairment to reflect new digital technologies available via the internet and provide access to emergency services via these service channels;

The announcement of the 2010 National Relay Service review is a positive first step in progressing the accessibility options for Australians with disability. A clear commitment in the National Disability Strategy to adopting new digital technologies can provide a National Relay Service which encompasses the principles of Universal Design; offering Australians with hearing or speech-impairment the dignity and choice to communicate in their preferred format.

3. Ensure all levels of government and contracted public service providers deliver best practice in the accessibility of electronic, print, web and audio-visual communications;

The commitment to implement WCAG 2.0 is a great first step but expanding obligations to include contracted service providers will greatly increase the numbers of accessible websites and therefore increase social inclusion.

4. Promote universal design of information and communication equipment by incorporating accessibility criteria in all government procurement policies and publicly funded service provider contracts;

ACCAN sees the opportunity provided by the National Disability Strategy as a way for the Federal, State and Territory Governments to lead the way in supporting the economic participation and social inclusion of Australians with disability by adopting the successful models of public procurement policies that have been incorporated in the European Union and the United States marketplaces. Through the power of these government economies mainstream products and services are increasingly being developed incorporating the principles of Universal Design.

5. Ensure people with disability have affordable and accessible internet, voice and government services delivered via the National Broadband Network;

ACCAN sees the National Disability Strategy providing the opportunity to move forward in the expansion of the Universal Services Obligation: expanding it's scope to encompass the current standards of digital telephony, providing Australians with disability access to the essential equipment and services they need to interact in the ever expanding information and communications technologies that are part of the Australian social economy.

6. Implement a transition plan to provide for universal audio description and captioned DVDs, Cinema, Online and television broadcast services of high quality, enforced by the Australian Communications and Media Authority

As a whole of government initiative, ACCAN's expectation is that the National Disability Strategy will empower all regulatory bodies to ensure that all retail DVDs, Cinema, Online broadcasts and television broadcasts be required to comply with accessibility requirements outlined in the Commonwealth Disability Discrimination Act (1992) when providing goods and services to the Australian public.

These recommended action items need to be supported by robust performance indicators.

ACCAN therefore encourages the National Disability Strategy to adopt the following performance indicators to support these actions:

- Increase in the proportion of people with a disability regularly using the internet;

By way of annual State and Territory statistical analysis, ACCAN anticipates that the National Disability Strategy should see at minimum, equal internet usage across both the disabled and non-disabled population.

- Increase in the proportion of people with a disability having their preferred accessible telephone service in their home and at their place of work; and
- Increase in the proportion of DVDs, Cinema, Online and television broadcasts with captioned and audio description services.

ACCAN is committed to the principle of full accessibility services in the DVD, Cinema, Online and television broadcasting industries. The National Disability Strategy offers the opportunity to require all these industries to provide accessible services of captioning and audio description, reaching annual pre-determined levels of compliance as determined through consultation with the disability sector.

We believe that these recommended actions will meet the stated aspirations of the National Disability Strategy and will put Australia on a path towards a truly inclusive community.



Allan Asher
Chief Executive Officer

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CONTENTS

1.	Connecting Us All: the Role of the National Disability Strategy	2
2.	Introduction	6
3.	Background to National Disability Strategy	6
4.	Inclusive Communications.....	7
5.	About the Convention.....	8
6.	Background to the National Broadband Network.....	11
7.	Opportunities and Implications of Broadband	12
8.	Recommendations for the National Disability Strategy.....	15
9.	Implementing the Convention.....	16

2. INTRODUCTION

This report has been prepared to assist the Australian Communications Consumer Action Network (ACCAN) campaign for accessible communications services. The report identifies opportunities for communications issues to be incorporated in the National Disability Strategy (NDS) and addressed through its implementation plans. The report outlines the rationale of the National Disability Strategy, explains the relevant aspects of the United Nations Convention on the Rights of People with Disabilities and explores the changing role of technology, such as broadband services, in meeting the communications and information needs of people with disabilities.

3. BACKGROUND TO NATIONAL DISABILITY STRATEGY

The Council of Australian Governments (COAG) has adopted the National Disability Agreement (NDA) and all Commonwealth, Territory and States governments have been charged with, and committed to, the development of national policy and reform directions in the disability sector to achieve the defined outcomes of:

- People with disability achieve economic participation and social inclusion;
- People with disability enjoy choice, wellbeing and the opportunity to live as independently as possible; and
- Families and carers are well supported

The COAG NDA defines the Commonwealth government's role as (amongst other things) to ensure that Commonwealth legislation is aligned with national priorities, reform directions and the United Nation's Convention on the Rights of People with Disabilities.

The COAG NDA contains agreement that the Commonwealth, Territory and State governments will work together to implement the Commonwealth's commitment to the establishment of a National Disability Strategy (NDS) as a broad policy document that guides disability policy across jurisdictions. The NDS aims to address the barriers that are faced by Australians with disabilities and promote social inclusion.

The NDS Discussion Paper was launched in October 2008. In August 2009, the Australian Government launched the NDS Consultation Report *Shut Out: The Experience of People with Disabilities and their Families in Australia* prepared by the National People with Disabilities and Carer Council.

At the Community and Disability Services Ministers' Conference in September 2009, Ministers agreed that the National Disability Strategy would provide an inter-governmental, whole-of-government framework for improving outcomes for people with disabilities.

In November 2009, the Government announced that it is moving to include the NDS within COAG reform agenda; and as part of the NDS, the Australian Government has commissioned the Productivity Commission to undertake a feasibility study into long-term care and support for people with disabilities in Australia.

In February 2010, the Rudd Government stipulated that all government websites must adhere to the standards contained in WCAG 2.0 by 2015. In its press release, the Rudd Government announced that it is developing a National Transition Strategy for the move to WCAG 2.0, which will form part of the National Disability Strategy to be released later this year. The inclusion of adherence to standards contained in the WCAG 2.0 standard is welcome and indicates that access to information will be included in the NDS.

4. INCLUSIVE COMMUNICATIONS

There are three main reasons for Governments to include communication services and technologies in the NDS, they are as follows:

a. Compliance with International Law –

By including communication and information services in the NDS, the Commonwealth government will be able to demonstrate compliance with Articles 4, 9 and 21 of the United Nations Convention on the Rights of Persons with Disabilities;

b. Meeting the Existing Obligations in the COAG National Disability Agreement –

The COAG NDA states that all governments recognise the importance of mainstream services in supporting the outcomes of the NDA. Because communication services are enabling technologies, their specific inclusion in the NDS will assist all levels of governments to ensure that all people with disability have access to mainstream government services within their jurisdiction. For example by funding a video relay service for Deaf AUSLAN users the Government will facilitate access to all levels of government via telephone.

c. New Government Services on Broadband –

The NDS needs to accommodate expected changes in the way governments communicate and interact with citizens during future years. For example, if Commonwealth, Territory or State governments are planning to deliver services using broadband (eg. E-Health, E-Education, etc) there is a need to ensure that these services are accessible for people with disabilities. This means that if an additional piece of technology is required to make broadband accessible, or broadband needs to be more affordable for people with disabilities, then the government needs to accommodate these circumstances in policy decisions. Ensuring affordable and accessible broadband access for people with disabilities will facilitate the development of efficient and inclusive government services.

5. ABOUT THE CONVENTION

In December 2006, the United Nations General Assembly adopted the Convention on the Rights of Persons with Disabilities (the Convention). The Convention on the Rights of Persons with Disabilities came into force as part of international law in May 2008. In July 2008, Australia agreed to put the Convention on the Rights of Persons with Disabilities into practice.

The aim of the Convention (Article 1) is to make sure that people with disability enjoy human rights, freedoms and respect like other people.

The definitions in the Convention (Article 2) include:

- ‘Communication’ means all types and formats of communication, including spoken languages, sign languages, written text, Braille, touch, large print, audio, plain-language, human-reader, accessible information and communication technology and other types of communication.
- ‘Language’ includes spoken languages, sign language and other forms of non-spoken languages.
- ‘Discrimination on the basis of disability’ is when a person is excluded, prevented from doing something or treated differently because of a person’s disability, in a way that prevents that person from exercising or enjoying all human rights and freedoms in the same way other people do. This includes denying the person reasonable accommodation.
- ‘Reasonable accommodation’ means appropriate changes or adjustments that need to be made in order to allow a person with disability in a particular situation to exercise or enjoy all human rights and freedoms in the same way other people do. The changes or adjustments cannot be too hard to carry out.
- ‘Universal design’ means designing products, places, programs and services in a way that allows all people to use them, as far as possible, without having to make changes. However, assistive devices for particular groups of people with disability can be made where needed.

By agreeing to the Convention, Australia is to make sure that people with disability enjoy all human rights and fundamental freedoms without discrimination of any kind because of disability (Article 4 of the Convention).

The United Nations Convention on the Rights of Persons with Disabilities – A Plain English Guide includes definitions requiring inclusion of appropriate access to communication (eg. sign language) and information (eg. Braille or electronically) as accessibility and freedom of expression and opinion, and access to information, each of which are detailed below.

Source: *United Nations Convention on the Rights of Persons with Disabilities – A Plain English Guide*

Article 9: Accessibility

People with disability have the right to live independently and take part in all aspects of life.

To let them do that, countries need to take appropriate steps to give people with disability access, in the same way other people have access, to things, places, transport, information and services that are open to the public. This applies in the cities as well as in rural areas.

To do that, countries should:

- find out what is making it hard for people with disability to access all aspects of the community those things and take steps to remove them;
- make sure people with disability have equal access to buildings, roads, transport and public facilities like schools, housing, hospitals, clinics and workplaces; and
- make sure people with disability have equal access to information, communications and other services, including electronic services like the Internet and emergency services.

Countries are also to take appropriate steps to:

- set standards and guidelines for access to facilities and services that are open to the public;
- make sure that private businesses that provide facilities or services to the public take into account access for people with disability;
- provide training for people involved with access for people with disability;
- use signs that are in Braille and easy to read and understand in buildings and other facilities open to the public;
- provide a person to assist in buildings and other facilities open to the public, like guides, readers and professional sign language interpreters;
- promote other types of help to people with disability to make sure they can access information;
- promote access for people with disability to new information and communications technologies and systems, like the Internet; and

- have those who make information and communications technologies take into account access for people with disability, so that these technologies and systems can be available at a low cost.

Article 21: Freedom of expression and opinion, and access to information

Countries are to take appropriate steps to make sure people with disability have the right to say what they think and share their ideas like other people do. This includes being free to ask for, get and share information and ideas through sign languages, Braille, large print or other types of communication.

Some steps that countries should take include:

- providing public information in other formats (such as Braille or electronically) in a timely way and at no extra cost;
- letting people with disability use Braille, sign language and other types of communication when they deal with government agencies;
- urging private companies that provide services to the public, including through the Internet, to provide information and services in formats that people with disability can access;
- encouraging the media and Internet providers to make their services accessible to people with disability; and
- accepting and promoting the use of sign languages.

6. BACKGROUND TO THE NATIONAL BROADBAND NETWORK

In a joint press release in April 2009, the Prime Minister, Treasurer, Minister for Finance and Minister for Broadband Communications and the Digital Economy announced major reform in telecommunications with the introduction of the National Broadband Network (NBN). In April 2009, the Australian Government announced that it would “establish a new company, NBN Co Limited (NBN Co), to build and operate the network, providing 90 percent of ‘fibre to the premises’ coverage delivering speeds of 100 megabits per second with remaining coverage through state of the art wireless and satellite technologies, offering speeds of up to 12 megabits per second or more, to people living in more remote parts of rural Australia”.¹

The introduction of the NBN complements the Commonwealth Government’s existing Australian Broadband Guarantee that offers a minimum 512 kbps download and 128kbps upload data speed to Australians who cannot access metro-comparable broadband services eg. in remote parts of Australia.

In September 2009, Mike Quigley, CEO of NBN Co presented details of some of the activities planned by NBN Co in the next six months, and gave an update on NBN Co’s latest technology thinking in his NBN Co – Initial Steps. It appears from the presentation that the current focus is on industry engagement, wholesale access model, network and operational design, a rollout plan and commercial negotiations. Leading up to the design and deployment of the NBN, ACCAN believes that priorities about the access needs of all Australians, including people with disabilities need to be identified and resolved now, as this is the critical decision-making time. Decisions made now will be difficult to change (because they will result in costly retro-fitting). Importantly, decision-making needs to be informed. This is the ideal time for government to require NBN Co to enter into high-level discussions on network issues in relation to accessible and inclusive communications for all, including people with disabilities, and the national emergency call persons and emergency service organisations.

The NBN Co’s website states that it will provide wholesale services only and provide **up to** 100Mbps broadband access to retail service providers. NBN Co gives the qualification that the products and service offerings that retail service providers (RSP) make available will be a matter for the RSPs and the market.

It is a challenge for all parties to envisage the completed NBN – What will it look like? What impact will it have? Who will use it? How will people use it? What will be the benefits? Will all people be able to use it? What will it cost to consumers? What will be replaced by the existence of the NBN?

¹ http://www.dbcde.gov.au/broadband/national_broadband_network Document ID80649 - last modified 15 March 2010

Australia is in the process of transitioning to a digital society. Great change is anticipated for all Australians as a result of the introduction of the NBN and the way we consume communication services. The process of great change provides governments with new opportunities to address the telecommunications and information needs of people with disabilities in a positive way through the benefits provided by broadband. As we move forward and embrace the change, some of the issues affecting people with disabilities will be obvious (eg. TTYs do not work on digital networks that use compression) and some will be less obvious (eg. assistance will be required to assist people with disabilities to meet the costs of broadband plans with larger data capacities and no-data limits/caps).

The Department of Broadband, Communications and the Digital Economy (DBCDE) is in the process of preparing and implementing the policy changes associated with the reform in telecommunications created by the introduction of the NBN. A formal review of the National Relay Service has been announced and a review of the universal service is anticipated. It is expected that the NBN will allow all governments to deliver services to Australians in different ways, and may be used as the platform to deliver new government E-services (information, E-Education, E-Health, etc) to supplement the need for face-to-face enquiries, teaching, health consultations, etc. If good quality remote access is available via video, then it may avoid the need for people to travel vast distances to attend meetings, interviews, appointments, etc.

7. OPPORTUNITIES AND IMPLICATIONS OF BROADBAND

A national broadband network opens the way for exciting developments in services that have the capacity to transform the lives of people with disabilities. In February 2010 ACCAN published a report titled *Broadband Solutions for People with Disabilities*. The report identified the potential for enhanced televisions services, such as TV-based videophones, health services in the home, multi-modal conversations, remote interpreting, text-to-speech functionalities and more.

The Deaf community, for example, has long advocated for video communication via the telephone. Text communication was defined as the “voice equivalent” to a standard telephone service more than 15 years ago as the telecommunications networks did not support video (except with expensive specialised equipment using ISDN upload and download speeds of 384kbps – the equivalent of six telephone calls at once). Broadband at speeds that support sign language enable service delivery to meet the needs of people who rely on visual communication as their “voice equivalent” for telecommunications. As well as funding the service, the Government needs to define the upload data speeds in areas covered by fixed wireless and Satellite services as adequate for meaningful communication in Sign language.

a. Access to Emergency Services

Since the introduction of additional networks to the plain old telephone service, network issues have become apparent, with unexpected consequences, for people with disabilities. During the past decade, a number of submissions to raise network issues were made to the Commonwealth government by the Consumer Telecommunications Network (CTN), TEDICORE, Australian Association of the Deaf (AAD), Deafness Forum, and Australian Communication Exchange (ACE). The then Human Rights and Equal Opportunity Commission (now Australian Human Rights Commission) published its *When the Tide Comes in* Report and hosted a Telecommunications Forum at Parliament House in 2003 raising many issues regarding access to telecommunication services by people with disabilities.

Some of the issues included:

- removal of the analogue mobile network resulting in incompatibility of hearing aids with many mobile handsets;
- removal of the analogue mobile network resulting in incompatibility of teletypewriter (TTY using baudot code) with digital mobile networks;
- incompatibility of using a teletypewriter (TTY using baudot code) on a network that uses compression;
- the upload and download speed of data technologies to allow for two-way communication via video at speeds that will accommodate Sign language;
- access to emergency services via a mobile phone

In 2002, the Commonwealth's House of Representatives Standing Committee on Communications, Information Technology and the Arts made the following recommendation in its *Connecting Australia – Wireless Broadband report*, in relation to wireless broadband services for the hearing impaired - that the Commonwealth develop the means to provide hearing-impaired people with mobile telephones compatible with hearing aids, portable wireless devices that can communicate through the National Relay Service, and appropriately adapted video compression and transmission technology for video communication using sign language.”

While people who are Deaf have acknowledged that they have improved access to telecommunications services through the availability of the internet, instant messenger and short message service (SMS), many people still use a TTY at home. The current “voice equivalent” access to emergency services via the Emergency number 106 (equivalent to 000 from a landline) is only available via a TTY, or a computer with a modem via a landline. Deaf Australia is calling for access to 106 via SMS, IP relay and video relay.² In April 2010,

² www.deafau.org.au/info/policy_emgser.php

the Minister for Broadband, Communications and the Digital Economy announced the intention to establish an SMS emergency service for people with disabilities, and address any implementation issues as a matter of priority.

There are likely to be advantages for the emergency call service (000, 112, 106) and emergency service providers if telephone access to emergency services via the NBN is upgraded to include video for all Australians. A reliable broadband connection will enable the relevant emergency service (police, fire or ambulance) to “pull” video images to assist them to understand the nature of the emergency, as well as “push” video images to a hospital or to show the person at the scene of the emergency what to do. If the quality of the video is good enough for fluent communication

in Sign language, then it is expected that it will be good enough for meaningful use by emergency service providers.

Location information is critical to state-based emergency service providers to enable them to respond in an emergency – especially when there is confusion and the emergency service organisation has to return the call. Consideration needs to be given to identifying the accurate location of a caller in an emergency. The NBN Implementation study has acknowledged this issue.

b. Access to Emergency Warning Systems

Broadband (including via mobile devices) offers new delivery mechanisms to inform the general public (including people with disabilities) about emergencies (bushfire, cyclone, flood) in their immediate area. For various reasons people may not see or hear community service announcements on the television or radio (eg travelling, urgent workplace deadline, disability) informing them of an emergency/severe storm warning in their area.

SMS alerting systems have been implemented and/or suggested in recent years. Broadband provides the potential for radar images of weather patterns (significant in a bushfire, cyclone or flood) for all Australians in both rural and metropolitan areas. Multimedia may assist more Australians (eg. people with disabilities who are from non-English speaking backgrounds) to understand the immediate danger and be aware of the escape routes available in their area. “Stay or go” decisions need to be made with accessible, timely and accurate information. In circumstances where there is immediate danger, people with disabilities need access to reliable information and communication. Broadband can assist in new ways that are yet to be identified and implemented.

c. School of the Air – Distance Education

Broadband offers new delivery mechanisms for School of the Air and distance education.

Distance education used to mean writing projects and posting them to a teacher hundreds of kilometres away. Since 2003, the process is a lot more interactive with audio and video links via Satellite. Students participate in a virtual classroom where they can attend school assembly, have group discussions and even pass notes around the class.³

However, the current visual interaction is limited to downloading video. Uploading video is not widely possible at this stage due to current bandwidth issues – a trial of return path video at Katherine School of the Air and Alice Springs School of the Air has been very successful as it added another dimension to the distance education experience. By setting minimum upload speeds suitable for live video in all areas of Australia in its NBN Implementation Study, the Government would offer an even more interactive virtual “classroom” for students (including indigenous students) who are isolated in remote rural areas of Australia, and rely on distance education.

³ ABC Radio National, Bush Telegraph, “Learning by Satellite” 8 June 2010 (www.abc.net.au)

8. RECOMMENDATIONS FOR THE NATIONAL DISABILITY STRATEGY

The following broad recommendations are made for inclusion in the NDS in order to comply with the United Nations Convention on the Rights of Persons with Disabilities specifically in relation to Article 2 and 4 of the Convention - communication, language, discrimination, reasonable accommodation and universal design.

COAG governments should ensure that inclusive communication services be included in the National Disability Strategy in the following ways as accessible communication for people with disability underpins the delivery of government services:

- Accessible to people with disabilities (“functional equivalence”, dignity & independence, diversity of communication needs and abilities to use equipment, universal design, access to information, equipment to be accessible, ability to understand and enter into contracts, offer a range of payment methods, ability to participate in training)
- Available to people with disabilities (access in rural and remote areas, NBN may run past the person’s door as a wholesale service and will need to be connected by a retailer, access in multiple unit dwellings, or hostel/nursing home without being the building owner or contracted customer, rectification of faults - accessing repairs and maintenance, ‘standard telephone service’ definition may not provide equal access)
- Affordable for people with disabilities (products currently available that may suit the needs of people with disabilities may be too expensive if they are targeted to the business market, universal design is making products more affordable and people on a low income/pension may need some assistance to afford them)

in a fair and open manner via:

- Open access standards
- Interoperability (end-to-end connectivity, applications to work on any network, mobile, wireless internet, fixed internet ie. technology neutral)

The introduction of the NBN provides the Australia government with an opportunity to revolutionize the provision of communication services to people with disabilities.

A “vision” is required as people are tired of playing “catch-up” and trying to “fit” into existing program models that may not suit their needs. Governments need to put people with disabilities at the “top of the queue” by providing a proactive whole-of-person, technology-neutral approach to assist people with disabilities to identify and source communication products and services that would be most useful [not limited to the equipment currently listed in the *Telecommunications (Equipment for the Disabled) Regulations 1998* to their specific needs at affordable prices.

An inclusive consumer program could release the consumer from being “owned” by a carrier or carriage service provider and would reflect the following principles:

- Comparability (access in rural and remote areas for people with disabilities, access in multiple unit dwellings, or hostels/nursing homes without being the building owner or contracted customer, universal design, “functional equivalence”, meeting the diversity of communication needs, end-to-end connectivity);
- Choice (open access standards ie. IETF, ITU, etc; interoperability - applications to work on any network, mobile, wireless Internet, fixed Internet ie. technology neutral; dignity and independence to access information and choose preferred equipment [including TTY to be available for people who want it]; service provider; payment method); and
- Capacity of the individual to obtain and digest information, use equipment, pay (affordability), understand and enter into contracts, make payment (offer a range of payment methods – not just a credit card), participate in training, negotiate rectification of faults - accessing repairs and maintenance.

9. IMPLEMENTING THE CONVENTION

The following recommendations are made for inclusion in the NDS Implementation Plan in order to comply with the United Nations Convention on the Rights of Persons with Disabilities specifically in relation to telecommunications and information:

- Article 9: Accessibility, and
- Article 21 Freedom of expression and opinion, and access to information

Article 9: Accessibility

People with disability have the right to live independently and take part in all aspects of life.

To let them do that, countries need to take appropriate steps to give people with disability access, in the same way other people have access, to things, places, transport, information and services that are open to the public. This applies in the cities as well as in rural areas.

To do that, countries should:

a. Find out what is making it hard for people with disability to access all aspects of the community those things and take steps to remove them

All government departments, statutory authorities and agencies to:

- Implement a comprehensive reform program to shift the focus from primarily requiring voice communications to requiring a broadband platform that enables many applications, including voice, text and video.
- Accept calls via the National Relay Service.

Commonwealth Government Communications Policy to:

- Identify and address TTY compatibility issues over networks that use compression ie. Satellite networks and wireless networks when moving forward with the NBN – especially in relation to accessing Emergency 106 via a TTY if the broadband policy ‘fallback position’ is a standard telephone service.
- Introduce a Video Relay Service in the National Relay Service (NRS) contract to meet the needs stated on Deaf Australia’s website:

“Deaf people are concerned that they are being disadvantaged in using out of date telecommunications. National Relay Service (NRS) is a text-based service where deaf people have to type in their messages to the relay operator. For deaf people whose first or preferred language is Auslan, it is too slow! The inclusion of a video relay service (VRS) will provide a functionally equivalent service that all others enjoy.” Similarly, a Video Relay Service would assist people with a communication impairment who require an independent communication support worker to assist with communication.

- Adopt the pro-consumer communication recommendations that arise from Government enquiries (eg. DBCDE Media Access Review) as a priority eg. by setting continuously rising interim targets for access to electronic media (including quality internet access).
- Continue to fund advocacy organisations that represent the telecommunications needs of people with disabilities.
- Identify access issues by incorporating questions about the adoption of broadband by people with disabilities in the Australian Bureau of Statistics surveys.

b. Make sure people with disability have equal access to buildings, roads, transport and public facilities like schools, housing, hospitals, clinics and workplaces

All government departments, statutory authorities and agencies to:

- Require that access to telecommunications services and equipment in public facilities like schools, housing, hospitals, clinics, workplaces, hostels/nursing homes, etc be available to people with disabilities.
- Provide information about accessing physical facilities (eg. transport timetables for accessible forms of transport and maps/plans of venues with ramps etc marked) via the internet.

c. Make sure people with disability have equal access to information, communications and other services, including electronic services like the Internet and emergency services

All government departments, statutory authorities and agencies to:

- Comply with the Rudd Government's stipulation in February 2010 that all government websites must adhere to the standards contained in WCAG 2.0 by 2015 (ie level 2 of 3); Define when Australia will reach Level 3 of 3; Consult with W3C members (such as Media Access Australia) about the implementation of the WCAG standard.
- Provide customer service information, explanatory notes and application forms in plain English with visual cues and also make it available in languages other than English (including Auslan). An excellent example of the production of a Commonwealth government document in plain English with visual cues is the *Developing a National Disability Strategy for Australia (Easy English Version October 2008)*

Commonwealth Government Communications Policy to:

- Ensure the preferred mode of communication is available for people with disabilities using telecommunications either directly or via a third party (eg. National Relay Service) as follows:
 - Speak and be able to read the reply (either directly or via a third party) if you have a hearing impairment;

- Hear and be able to use your voice or alternative and augmentative communication device (either directly or via a third party) if you have a speech impairment;
 - Communicate in Sign language (either directly or via an interpreter third party) if you are Deaf;
 - Communicate in real-time text (either directly or via a third party) if you are Deaf or have a hearing or speech impairment;
 - Access to emergency services via any of the above communication preferences.
- Require and fund the following services:
 - Video relay;
 - Access to 106 emergency service via IP relay and video relay;
 - Improve access to emergency services for people with a speech impairment (currently required to dial a 10 digit number (via the National Relay Service -NRS) or 000 (without NRS support);
 - SMS access to emergency services as announced by the Government in 2010;
 - Captioned telephony.
 - Training for users on all of the above services
 - Require that access to emergency 106 is available, reliable and adequate at all times of day and in all network conditions in a remote area serviced by satellite, wireless or ADSL2+ (if this is proposed to be upgraded or retained in any area).
 - Make all emergency alerts services (bushfire, cyclone, flood, etc) accessible.

d. Set standards and guidelines for access to facilities and services that are open to the public

Commonwealth Government Communications Policy to:

- Define the minimum download and upload data requirements for the NBN to be adequate for communication in Sign language or via an independent communication support worker in all areas (including rural and remote areas) and applied to all NBN layers – equipment, applications, service provider, retailer and network.
- Ensure broadband networks are able to accommodate priority assistance services.

e. Make sure that private businesses that provide facilities or services to the public take into account access for people with disability

Commonwealth Government Communications Policy to:

- Require the telecommunications industry, through Communications Alliance to consult with people with disabilities, and consider their needs in relation to the lead-in facilities up to the end-user devices (eg. telephone, computers, AV equipment, medical and security) as defined by the End User Premises Project Team of Communications Alliance ⁴
- Require the telecommunications industry to make information about accessibility features of equipment easily available to the public.
- Require and fund the contracted NRS provider to provide NRS training to private business.
- Develop Australian Standards on accessibility to services and information by industries that serve the public interest (eg, applicable to media, communications companies, utilities companies, transport companies, and banks).

All organisations that receive government funding or win government contracts to provide public services to:

- Provide customer service information in accessible formats using appropriate conversion software from an electronic file created in accordance with W3C principles (eg. screen reader or magnification software, Braille, large print and audio).

⁴ https://commswiki.dgit.biz/index.php/Main_Page#NBN_Reference_Model last modified on 10 November 2009

- Implement websites that are accessible and demonstrate compliance with web accessibility guidelines W3C standards.
- Provide customer service information in plain English with visual cues and also make it available in easy English, Braille and languages other than English (including Auslan) on request.

f. Provide training for people involved with access for people with disability

All government departments, statutory authorities and agencies to:

- Ensure relevant staff are trained regarding the needs of people with disabilities.
- Ensure relevant staff are trained regarding WCAG 2.0 requirements.
- Fund not-for-profit community organisations to provide customer information sessions about the personal management of telecommunications services in the customer's preferred language or rate of delivery; or via an interpreter including (not limited to):
 - Accessing Broadband (what are the benefits to consumers);
 - Choosing a service provider and plan (what to look for, what is required, where to get advice, how to compare plans);
 - Understanding contracts and payment methods;
 - Protection of identity (eg. PIN);
 - Protection from scamming;
 - Protection from unexpectedly high bills;
 - Tracking usage of download limits to monitor expenditure;
 - Paying bills;
 - Making a complaint

g. Use signs that are in Braille and easy to read and understand in buildings and other facilities open to the public

All government departments, statutory authorities and agencies to:

- Use signs that are in Braille and easy to read and understand in buildings and other facilities open to the public. As new technologies similar to “google maps” become available encourage owners of buildings open to the public to be early adopters to improve accessibility

h. Provide a person to assist in buildings and other facilities open to the public, like guides, readers and professional sign language interpreters

All government departments, statutory authorities and agencies to:

- Provide one-on-one customer support/training by a trained staff member and an interpreter or independent communication support worker, if necessary.
- Provide audio guides and captions in public service buildings and museums, etc. use of wireless broadband will make such services more accessible as more consumers carry their accessible smart phones.

i. Promote other types of help to people with disability to make sure they can access information

All government departments, statutory authorities and agencies to:

- Make available the sequence of telephone Interactive Voice Response (IVR) prompts on the websites to assist people to prepare for the prompts before they commence a telephone call.
- Provide hearing and visual augmentation for queuing at service counters.
- Provide audio alternatives to touch screen customer queuing and information kiosks.

j. Promote access for people with disability to new information and communications technologies and systems, like the Internet

Recommendations A, E and K are relevant.

k. Have those who make information and communications technologies take into account access for people with disability, so that these technologies and systems can be available at a low cost

All government departments, statutory authorities and agencies to:

- Implement a procurement policy to require the purchase of equipment, software and applications that are accessible to people with disabilities eg. section 508 of the *Americans with Disability Act* (US) which required the US Federal Government to purchase only accessible technologies and equipment. As the US government is such a large consumer, market forces encouraged the development of more affordable mainstream devices that are accessible.

Commonwealth Government Communications Policy to:

- Deliver a subsidised telecommunications customer equipment program for people with disabilities to enable them to (depending on the needs of the individual):
 - Access the content of web pages if you are blind or have a vision impairment;
 - Access text messages or the internet on a mobile handset if you are blind or have a vision impairment;
 - Read and type Braille on a textphone or IP device if you are Deafblind;
 - See &/or type text communication on a textphone or IP device if you are Deaf or have a hearing or speech impairment;
 - Use an alternative and augmentative communication device if you have little or no speech via a phone, videophone or IP device;
 - See Sign language via a videophone or IP device if you are Deaf;
 - See or feel the phone ring if you are Deaf, Deafblind or have a hearing impairment;
 - Increase the volume of the ring tone to hear the phone ring if you have a hearing impairment;
 - Increase the volume on the handset to hear the voice at the other end of the telephone if you have a hearing impairment;

- See (eg. big buttons, light/dark contrast to show buttons clearly, large visual displays with large fonts, or feel the features on a handset if you have a vision impairment);
 - Feel tactile surfaces eg (eg. raised dots to aid navigation, raised buttons) if you are blind;
 - Use keyboard or audible navigation instead of on-screen navigation if you are blind;
 - Hear audible output of digital screen information if you are blind;
 - Use a speaker phone if you have difficulty holding the handset;
 - Program the features of the handset to suit the needs of the customer (eg speed dialling for frequently called numbers)
- Introduce training for Australians with disabilities who are provided with telecommunications customer equipment to meet their needs.
 - Introduce a communications allowance or rebate for Australians with disabilities to cover the initial and on-going cost of computer equipment or smart phones (including specialised equipment for people with disabilities and ongoing security upgrades) and the cost of the broadband connection of high enough quality to support the communication needs of people who may require broadband plans with larger data capacities and no-data limits/caps to:
 - Download audio files (books, newspapers, magazines, GPS navigation, etc); and
 - Download and upload of live video for Sign language, or communication via an independent communication support worker.

The communications allowance or rebate needs to give people with disabilities choice regarding the broadband plan, installation, customer equipment, wireless cards, router/modem, no data limits (upload or download), and accessibility devices, etc. It would be desirable for Government to require broadband charges in rural and remote areas to be comparable to broadband charges in metropolitan areas.

The communications allowance or rebate needs to be allocated per person and not per household. To make broadband more affordable, a communications allowance or rebate program, should include any broadband provider selected by the consumer (fixed, mobile, terrestrial, satellite, wired or wireless) that meets the minimum criteria set by DBCDE or ACMA and is available to pre-paid or account customers. Ideally, it would not be means-tested and would apply in different situations over a person's stages of life.

Article 21: Freedom of expression and opinion, and access to information

Countries are to take appropriate steps to make sure people with disability have the right to say what they think and share their ideas like other people do. This includes being free to ask for, get and share information and ideas through sign languages, Braille, large print or other types of communication.

Some steps that countries should take include:

I. Providing public information in other formats (such as Braille or electronically) in a timely way and at no extra cost

All government departments, statutory authorities and agencies to:

- To provide broadband and accessible 'internet kiosks' (hardware, software and applications) in communal areas of all libraries at no charge and with no time/data limits.

m. Letting people with disability use Braille, sign language and other types of communication when they deal with government agencies

All government departments, statutory authorities and agencies to:

- Make services that are available online and over the phone accessible to people with disabilities.
- Make community service announcements that are captioned with appropriate reference to phone number access for people who are deaf or have a hearing or speech impairment and access to information via the internet.

n. Urging private companies that provide services to the public, including through the Internet, to provide information and services in formats that people with disability can access

All government departments, statutory authorities and agencies to:

- Establish an Australian Standard for communications accessibility that applies to all private companies that serve the public interest.
- Require broadband and accessible 'internet kiosks' (hardware, software and applications) to be available in public facilities like schools, housing, hospitals, clinics, community centres, workplaces, hostels/nursing homes
- Urge private companies that provide services to the public, including through the internet, to provide contractual information in plain English and consider the contractual capacity of people with disabilities (ie. does the person understand what they are signing and what they have agreed to?)
- ACMA to establish an annual telecommunications award with nominations accepted from people with disabilities for "Inclusive Communications Services and Technologies".
 - Encouraging the media and Internet providers to make their services accessible to people with disability

All government departments, statutory authorities and agencies to:

- Establish statutory or regulatory targets for media and communications accessibility. ACMA to be empowered to enforce those targets (the British media and communications regulator, Ofcom, provides a good example of how this could be achieved)
- Make community service announcements that are captioned with appropriate reference to phone number access for people who are deaf or have a hearing or speech impairment and access to information via the internet.

o. Encouraging the media and Internet providers to make their services accessible to people with disability

All government departments, statutory authorities and agencies to:

- Establish statutory or regulatory targets for media and communications accessibility. ACMA to be empowered to enforce those targets (the British media and communications regulator, Ofcom, provides a good example of how this could be achieved)
- Make community service announcements that are captioned with appropriate reference to phone number access for people who are deaf or have a hearing or speech impairment and access to information via the internet.

p. Accepting and promoting the use of sign languages

All government departments, statutory authorities and agencies to:

- Incorporate the preferred mode of communication of people with disabilities using telecommunications either directly or via a third party (eg. National Relay Service) as follows:
 - Communicate in Sign language (either directly or via an interpreter third party) if you are Deaf;
 - Access to emergency services via Sign language.



**Australian Communications
Consumer Action Network**