



Issues Paper: Promoting Inclusion

Submission by the Australian Communications Consumer Action Network to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

1 April 2021

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 communications services that are trusted, inclusive and available for all.

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 represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

Contact

Meredith Lea
Disability Policy Adviser

PO Box 639,
Broadway NSW, 2007
Email: info@accan.org.au
Phone: (02) 9288 4000
Fax: (02) 9288 4019
Contact us through the [National Relay Service](#)

Contents

| | |
|--|----|
| 1. Executive Summary..... | 5 |
| 1.1. List of recommendations | 5 |
| 2. Responses to Questions..... | 8 |
| 2.1. Response to question 1..... | 8 |
| 2.2. Response to question 2..... | 8 |
| 2.3. Response to question 3..... | 10 |
| 2.4. Response to question 4..... | 11 |
| 2.5. Response to question 5..... | 11 |
| 2.6. Response to question 6..... | 12 |
| 2.6.1. Inclusive telco services..... | 13 |
| 2.6.2. Safe and reliable communications technologies | 14 |
| 2.6.3. Accessibility of devices..... | 14 |
| 2.6.4. Affordable communications technologies | 15 |
| 2.6.5. Inclusive online environments | 15 |
| 2.6.6. Accessible audio-visual content..... | 16 |
| 2.6.7. General accessibility..... | 17 |
| 2.7. Response to question 7..... | 19 |
| 2.8. Response to question 8..... | 19 |
| 3. Conclusion..... | 22 |
| 4. Appendix - Ideal Accessible Communications in Australia | 23 |
| About this document..... | 23 |
| Ideal accessible communications | 23 |
| 4.1. Inclusive telco services..... | 24 |
| 4.1.1. Accessibility of information, plans and contracts | 24 |
| 4.1.2. Customer service..... | 24 |
| 4.1.3. The National Relay Service (NRS)..... | 25 |
| 4.2. Safe and reliable communications technologies | 25 |
| 4.2.1. Resilient services | 25 |
| 4.2.2. Emergency services..... | 25 |
| 4.2.3. Health and wellbeing | 26 |
| 4.2.4. Scam protection and cyber security | 26 |
| 4.3. Accessibility of devices..... | 26 |
| 4.4. Affordable communications technology..... | 27 |

| | | |
|--------|--------------------------------------|----|
| 4.5. | Inclusive online environments | 28 |
| 4.5.1. | Web accessibility..... | 28 |
| 4.5.2. | Digital inclusion training..... | 28 |
| 4.5.3. | Digital choice | 29 |
| 4.6. | Accessible audio-visual content..... | 29 |
| 4.7. | General accessibility..... | 30 |
| 4.8. | Contributors and supporters | 30 |

1. Executive Summary

ACCAN thanks the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission) for the opportunity to provide a response to the Promoting Inclusion Issues Paper.

As Australia's peak consumer organisation in the communications sector, ACCAN has a long history of advocating for and representing the rights of communications consumers with disability. We are proud to have a wide range of disability organisations as members, and as valuable contributors to and supporters of our work. As we did in our previous submissions to the Royal Commission, ACCAN offers information relating specifically to the communications sector and the experiences of communications consumers with disability.

Available, affordable, and accessible digital communications technologies and services can support and enable the enjoyment of fundamental freedoms and human rights, leading to improved opportunities for people with disability. It is therefore ACCAN's position that accessible and affordable digital communications technologies and services can play a significant role in facilitating a more inclusive and accessible society in which people with disability are equal and active participants.

Our following submission is based upon ACCAN's Ideal Accessible Communications Roadmap,¹ and its accompanying Action Plan.² These documents are based on feedback from 35 organisations, including Disabled Peoples Organisations, advocacy groups and disability service providers, and 9 people with disability. ACCAN acknowledges and greatly appreciates the insights offered by these contributors.

1.1. List of recommendations

Recommendation 1: Access to accessible and affordable communications technologies must be recognised as a precondition for a truly inclusive society, and public policy must prioritise the removal of barriers to communications products and services.

Recommendation 2: A National Digital Inclusion Roadmap that provides a whole-of-government strategy on digital inclusion must be developed to guide government, non-government and private sector action and to ensure a collaborative and inclusive approach to digital inclusion.

Recommendation 3: The National Disability Strategy 2020-2030 must continue to be underpinned by the Convention on the Rights of Persons with Disabilities and must focus on upholding the human rights of all people with disability in Australia. Furthermore, digital communications technologies and services must be recognised in the Strategy as an enabler of human rights.

Recommendation 4: ACCAN's Ideal Accessible Communications Roadmap must be fully incorporated into the National Disability Strategy 2020-2030 to ensure the accessibility of information and communications technologies and services is a priority for the next 10 years.

¹ Available: <http://accan.org.au/our-work/1765-accessible-comms-roadmap>

² The Action Plan is not publicly available, however ACCAN would be happy to share this with the Royal Commission upon request.

Recommendation 5: Reforms to the *Disability Discrimination Act 1992* must assign greater powers to the Australian Human Rights Commission to perform compliance monitoring and investigations into cases of systemic discrimination against people with disability or systemic failure to meet Standards.

Recommendation 6: As proposed by the Australian Human Rights Commission, ‘the Attorney-General of Australia should develop a Digital Communication Technology Standard under section 31 of the *Disability Discrimination Act 1992 (Cth)*. In developing this new Standard, the Attorney-General should consult widely, especially with people with disability and the technology sector. The proposed Standard should apply to the provision of publicly available goods, services and facilities that are primarily used for communication, including those that employ Digital Technologies such as information communication technology, virtual reality and augmented reality’.³

Recommendation 7: Existing digital skills training programs must be expanded to provide education about scams and online security to people with disability and accessibility needs. This could be achieved through expanding the Be Connected program to explicitly include people with disability. The potential to expand the Be Connected program to other cohorts was one of the conclusions of a recent review of this program.

Recommendation 8: Accessible digital inclusion education materials suitable for people with disability (including tailored material where required for older people with disability, children and young people with disability, First Nations people with disability, and people from culturally or linguistically diverse backgrounds) must be created and distributed. These materials would include information about password security, phishing and online scams; information about browser configuration (for safety and accessibility); and information about data collection to help consumers make more informed choices about when data collection may be beneficial and when it may pose a risk.

Recommendation 9: Mandatory secure-by-design standards must be introduced for communications and Internet of Things devices to assure consumers the products they purchase meet minimum security standards.

Recommendation 10: Disability awareness, accessible information and communication access training must be made mandatory for all telephone and internet service provider call centre, customer service, complaints handling and frontline staff.

Recommendation 11: Telephone and internet service providers must develop and disseminate accessible information to consumers, including accessible versions of complex documents such as product and service information, plans, contracts and bills, to ensure consumers with disability understand what they’re signing up for and liable to pay.

Recommendation 12: Australian governments must implement the actions outlined in ACCAN’s government-focused action tables as a matter of priority.

Recommendation 13: Federal, state, territory and local governments must commit to procuring and using digital communications technologies that meet the requirements of AS EN 301 549 ‘Accessibility requirements suitable for public procurement of ICT products and services’. This commitment must include the development and implementation of a whole-of-government procurement policy for accessible ICT.

³ Australian Human Rights Commission (AHRC), 2019. *Human Rights and Technology: Discussion Paper*, proposal 29. Available: <https://tech.humanrights.gov.au/consultation>

Recommendation 14: People with disability must be involved in the development, design and delivery of communications technologies and services, including the design and delivery of digital inclusion training programs.

Recommendation 15: All governments must embed inclusion into the standard terms and conditions of every government contract. These contracts must outline mandatory accessibility standards that the funding recipient must meet, a requirement to undertake consultation and/or user testing of digital and non-digital resources with people with disability, and a requirement to report on inclusion activities undertaken while receiving government funding.

Recommendation 16: Funding and support must be available to small businesses for them to make required accessibility upgrades to ensure they can provide goods and services to people with disability on an equal basis with all others.

Recommendation 17: As outlined in the government-focused action table, amendments must be made to the *Broadcasting Services Act 1992* to mandate the provision of essential accessibility features on broadcast and catchup television. This must include reforms like those provided in the 21st Century Communications and Video Accessibility Act in the United States, which requires access features for video content to follow the video to other platforms.

2. Responses to Questions

2.1. Response to question 1

Question 1: What does inclusion mean to you?

Inclusion is essential across all spheres of society, and as the world becomes increasingly digitally connected, is particularly essential in relation to digital inclusion. Connectivity is now crucial for so many parts of daily life, and as such, broadband and other forms of connectivity must be available, accessible, and affordable for everyone in Australia.

To ACCAN, inclusion means that no one is left behind. Inclusion means everyone's human rights are being promoted and protected, everyone has access to what they need to participate equally, and inclusive design principles are embedded in every facet of society. Inclusion means that the systems, institutions, laws, policies, and procedures that make up our society reflect, respect and celebrate the immense diversity of the human condition.

2.2. Response to question 2

Question 2: What makes an inclusive society?

- A. what are the characteristics of an inclusive society?**
- B. how can the supports people with disability need be provided in a way that is consistent with promoting an inclusive society?**
- C. what is the role of governments through legislation, policy making, funding and operation of public systems and services, in achieving an inclusive society?**
- D. what is the role of non-government institutions and the private sector in achieving an inclusive society?**
- E. how can inclusion in society be measured, monitored and reported on? What data is available that could be used?**

As outlined in the Convention on the Rights of Persons with Disabilities (CRPD), people with disability must be ensured equal access to information and communications technology (ICT), systems and products.⁴ Despite Australia's adoption of the CRPD, people with disability in Australia experience significant barriers to accessible and affordable communications technologies and services. These barriers (discussed in more detail in response to question 8) must be urgently addressed to support the creation of a genuinely inclusive society.

Indeed, as well as being a human right in its own regard, access to accessible and affordable digital communications technologies can lead to increased opportunities for people with disability.⁵ Improved access to accessible and affordable communications technologies and services can facilitate

⁴ As per article 9(1)(b) of the CRPD.

⁵ ACCAN's submission to the Department of Social Services National Disability Strategy stage 2 consultation explores this in more detail, as do our submissions to the AHRC's Human Rights and Technology Issues and Discussion Papers. These are available on ACCAN's website: <http://accan.org.au/our-work/submissions/1814-national-disability-strategy-stage-2>; <http://accan.org.au/our-work/submissions/1543-hr-tech-issues-paper>; and <http://accan.org.au/ourwork/submissions/1706-human-rights-and-technology-discussion-paper>

greater inclusion within society and more equal enjoyment of human rights, including for instance more inclusive workplaces,⁶ better access to education,⁷ and greater participation in cultural life, recreation activities, leisure and sport.⁸ Technology can also offer people with disability increased opportunities to participate actively in political and public life, through more accessible voting procedures, facilities and registration processes,⁹ which may in turn lead to greater representation of people with disability at all levels of government.

Recommendation 1: Access to accessible and affordable communications technologies must be recognised as a precondition for a truly inclusive society, and public policy must prioritise the removal of barriers to communications products and services.

Another essential characteristic of an inclusive society is equal access to information. The ability to obtain, communicate and distribute information on an equal basis with others is central to the protection of a range of other human rights.¹⁰ In our increasingly digitally connected society, this is also inextricably linked to communications technologies and services and digital inclusion.

As explained by the Australian Digital Inclusion Alliance, of which ACCAN is a member, ‘being digitally included means:

- A person has **affordable access** to high-quality internet, and owns appropriate devices to utilise the internet.
- A person can use the internet in an **accessible** way, whether they are living with disability, from culturally or linguistically diverse backgrounds, or with other needs.
- A person has the **ability**, skills and confidence to complete tasks on and benefit from the internet.¹¹

For Australia to be a genuinely inclusive society, all these preconditions for digital inclusion must be met for all people.

Recommendation 2: A National Digital Inclusion Roadmap that provides a whole-of-government strategy on digital inclusion must be developed to guide government, non-government and private sector action and to ensure a collaborative and inclusive approach to digital inclusion.

⁶ As per article 27 of the CRPD.

⁷ As per article 24 of the CRPD.

⁸ As per article 30 of the CRPD.

⁹ Lord, J. E. 2017. ‘Chapter 2: Accessible ICTs and the Opening of Political Space for Persons with Disabilities’, in J. Lazar and M. A. Stein (eds) *Disability, Human Rights, and Information Technology*, University of Pennsylvania Press, Philadelphia, pp24-25.

¹⁰ Jaeger, P. T., Wentz, B. and J. C. Bertot, 2017. ‘Chapter 4: The Intersection of Human Rights, Social Justice, the Internet, and Accessibility in Libraries: Access, Education, and Inclusion’, in J. Lazar and M. A. Stein (eds) *Disability, Human Rights, and Information Technology*, University of Pennsylvania Press, Philadelphia, p60-62

¹¹ Australian Digital Inclusion Alliance (ADIA) 2020. *A National Digital Inclusion Roadmap*, p10, available: <https://www.digitalinclusion.org.au/wp-content/uploads/2020/10/ADIA-A-National-Digital-Inclusion-Roadmap.pdf>

2.3. Response to question 3

Question 3: Do you think Australia is an inclusive society? If not, why not?

ACCAN agrees with the Royal Commission's assessment in the Issues Paper that people with disability continue to be excluded and segregated from different areas of life. In relation to communications, people with disability continue to experience barriers when accessing and using both accessible and inaccessible communications technologies. These barriers are outlined in response to question 8, and ACCAN welcomes the opportunity to discuss these with the Royal Commission in more detail as needed.

Over the past 10 or so years, ACCAN has made numerous recommendations which if implemented would have led to significant progress in increasing participation of people with disability in Australia. These recommendations have been made in response to a range of reviews and inquiries, both in the communications and disability sectors. This includes, for instance, submissions to the National Disability Strategy 2010-2020, which largely ignored the role of digital communications technologies as enablers of outcomes for people with disability in Australia. There has been little in the way of uptake of our recommendations, and many people with disability in Australia continue to be excluded from the whole-of-life benefits and participation made possible from full connectivity and access to what has become in the past decade an increasingly digitally connected society. A greater focus on accessible and affordable digital communications technologies and services is required in public policy in general, and through the National Disability Strategy 2020-2030 and *Disability Discrimination Act 1992* (DDA) more specifically.

Indeed, stronger legal protections are needed to prevent discrimination against people with disability in general, but in relation to communications technologies and services in particular. This is especially important given the high levels of discrimination experienced by people with disability in Australia, and the limitations of the DDA in dealing with it.¹² The Australian Human Rights Commission (AHRC) 'currently lacks the power to perform effective compliance monitoring and to investigate and remediate systemic discrimination against people with disability in Australia. The DDA must be reformed to assign greater powers to the AHRC to perform these activities, monitor implementation of the National Disability Strategy, and ensure the rights of people with disability are upheld in all spheres of Australian life.'¹³ Furthermore, the development of a Digital Communication Technology Standard under section 31 of the DDA would also help ensure stronger legal protections for people with disability accessing digital communications technologies in Australia.

Recommendation 3: The National Disability Strategy 2020-2030 must continue to be underpinned by the Convention on the Rights of Persons with Disabilities and must focus on upholding the human rights of all people with disability in Australia. Furthermore, digital communications technologies and services must be recognised in the Strategy as an enabler of human rights.

¹² Drummond, S. 2018. 'It's time to strengthen our disability discrimination laws', SBS, available: <https://www.sbs.com.au/topics/life/culture/article/2018/03/13/its-time-strengthen-our-disabilitydiscrimination-laws>; see also G3ict, 2020. Qualitative Data Collected by Variable for Australia, available: <https://g3ict.org/countryprofile/qualitative-data-collected-variable/australia>.

¹³ ACCAN 2020a, ACCAN submission - National Disability Strategy Stage 2, p28. Available: <http://accan.org.au/our-work/submissions/1814-national-disability-strategy-stage-2>

Recommendation 4: ACCAN’s Ideal Accessible Communications Roadmap must be fully incorporated into the National Disability Strategy 2020-2030 to ensure the accessibility of information and communications technologies and services is a priority for the next 10 years.

Recommendation 5: Reforms to the *Disability Discrimination Act 1992* must assign greater powers to the Australian Human Rights Commission to perform compliance monitoring and investigations into cases of systemic discrimination against people with disability or systemic failure to meet Standards.

Recommendation 6: As proposed by the Australian Human Rights Commission, ‘the Attorney-General of Australia should develop a Digital Communication Technology Standard under section 31 of the *Disability Discrimination Act 1992 (Cth)*. In developing this new Standard, the Attorney-General should consult widely, especially with people with disability and the technology sector. The proposed Standard should apply to the provision of publicly available goods, services and facilities that are primarily used for communication, including those that employ Digital Technologies such as information communication technology, virtual reality and augmented reality’.¹⁴

2.4. Response to question 4

Question 4: How can an inclusive society support the independence and choice and control of people with disability?

As outlined above, accessible and affordable communications technologies and services can support improved educational and employment outcomes for people with disability, which in turn supports the independence, choice and control of people with disability. ACCAN’s position is that ‘with sufficient human rights focused legislation, enforceable standards, and mandatory procurement rules around accessibility, many of the barriers to affordable and accessible digital technologies may be removed. The combined effect of these measures will not only improve access to accessible technologies, but will likely bring about greater and more equal economic, social and community opportunities for people with disability.¹⁵ It would also lead to greater consumer choice, and would enable people with disability to shop around not only for the accessibility features that best suit their needs, but also for the best deal.’¹⁶

2.5. Response to question 5

Question 5: How can an inclusive society support a person with disability’s right to live free from

- A. violence and abuse**
- B. neglect**
- C. exploitation?**

Contributors to ACCAN’s Ideal Accessible Communications Roadmap reported that people with disability are susceptible to phone and internet scams and cyber security issues. Contributors felt that

¹⁴ Australian Human Rights Commission (AHRC), 2019. *Human Rights and Technology: Discussion Paper*, proposal 29. Available: <https://tech.humanrights.gov.au/consultation>

¹⁵ ACCAN 2018, *ACCAN submission Human Rights and Technology Issues Paper*, pp7-8. Available: <http://accan.org.au/our-work/submissions/1543-hr-tech-issues-paper>

¹⁶ ACCAN 2020b, *ACCAN submission Human Rights and Technology Discussion Paper*, p20. Available: <http://accan.org.au/our-work/submissions/1706-human-rights-and-technology-discussion-paper>

older people with disability and people with disability from culturally and linguistically diverse backgrounds were disproportionately affected by scams. In addition, contributors reported that some people with disability experienced exploitation or financial abuse in relation to communications products and services. For some, this involved mis-selling practices, whereby people with disability were sold communications products and services that they would be unable to pay for. In other instances, we were told about people with disability being coerced into buying communications products and services for another person.

ACCAN offers the following recommendations as ways in which an inclusive society could support people with disability to live free from these types of experiences.

Recommendation 7: Existing digital skills training programs must be expanded to provide education about scams and online security to people with disability and accessibility needs. This could be achieved through expanding the Be Connected program to explicitly include people with disability. The potential to expand the Be Connected program to other cohorts was one of the conclusions of a recent review of this program.

Recommendation 8: Accessible digital inclusion education materials suitable for people with disability (including tailored material where required for older people with disability, children and young people with disability, First Nations people with disability, and people from culturally or linguistically diverse backgrounds) must be created and distributed. These materials would include information about password security, phishing and online scams; information about browser configuration (for safety and accessibility); and information about data collection to help consumers make more informed choices about when data collection may be beneficial and when it may pose a risk.

Recommendation 9: Mandatory secure-by-design standards must be introduced for communications and Internet of Things devices to assure consumers the products they purchase meet minimum security standards.

Recommendation 10: Disability awareness, accessible information and communication access training must be made mandatory for all telephone and internet service provider call centre, customer service, complaints handling and frontline staff.

Recommendation 11: Telephone and internet service providers must develop and disseminate accessible information to consumers, including accessible versions of complex documents such as product and service information, plans, contracts and bills, to ensure consumers with disability understand what they're signing up for and liable to pay.

2.6. Response to question 6

Question 6: What practical and sustainable steps can governments take to promote a more inclusive society for people with disability? What needs to change:

- A. in laws, policies and standards;**
- B. in implementation, monitoring, and accountability measures;**
- C. in service provision;**
- D. to ensure people with disability are closely consulted and actively included in all steps to promote a more inclusive society?**

Due to the work ACCAN has recently undertaken in relation to the Ideal Accessible Communications Roadmap and its associated Action Plan, ACCAN is in the position to outline a range of practical actions

that different levels of government may take to promote a more inclusive society for people with disability. The following actions relate specifically to the communications sector, however as discussed above, implementing these actions and facilitating equal access to accessible and affordable communications technologies and services will have wide-ranging impacts for people with disability.

Recommendation 12: Australian governments must implement the actions outlined in ACCAN's government-focused action tables as a matter of priority.

2.6.1. Inclusive telco services

| Strategic action | Timeframe | Government responsible |
|--|------------|-------------------------------------|
| Officially recognise communications connectivity as an essential, basic service and human right. | Short term | Federal |
| Call on all telephone and internet service providers to develop Disability Inclusion Action Plans (DIAPs) through active engagement and consultation with the disability community. | Short term | Federal |
| Provide ongoing funding for the Accessible Telecoms project to allow the continued provision of impartial and accessible information and advice to those seeking information about the accessibility of different communications devices and accessories. | Short term | Federal |
| Call on NBN Co to develop and implement a policy around accessible and informative consumer education. | Short term | Federal |
| Call on Communications Alliance to reinstitute their disability advisory group, comprised of people with disability and accessibility needs, to offer insights based on lived experience and to monitor telco performance against accessibility policies, standards, codes and guidelines. | Short term | Federal |
| Ensure multiple information access points and communication channels are provided by all service providers, organisations, government agencies and so on. | Short term | Federal, state, territory and local |
| Require the National Relay Service (NRS) provider Concentrix to provide all NRS services 24/7 every day of the year, and support the expansion of services to include tailored call options for consumers with intellectual disability and consumers who are Deafblind. | Short term | Federal |
| Re-establish a funded, standalone NRS outreach service and associated formalised community consultation regarding the NRS. | Short term | Federal |
| Ensure all future NRS contracts and funding arrangements require mandatory, ongoing Deaf and disability awareness and communication access training for all NRS staff. This would also include requiring NAATI certification for all NRS VROs, while monitoring its effect on workforce availabilities and the emergence of Artificial Intelligence to augment human services. | Short term | Federal |
| Ensure additional relay operator capacity is available for the NRS during periods of increased demand (such as natural disasters like the 2019-2020 bushfires, or the COVID-19 pandemic). | Short term | Federal |

2.6.2. Safe and reliable communications technologies

| Strategic action | Timeframe | Government responsible |
|--|------------|-------------------------------------|
| Alongside industry, partner with regional, rural and remote communities to design place-based solutions to address connectivity, accessibility and reliability issues experienced in these areas. | Short term | Federal |
| Subsidise audio-enabled power banks that are accessible for people who are blind or have vision impairment, to ensure these mobile users retain access to communications services during power outages or emergency situations. | Short term | Federal |
| Work alongside emergency managers, emergency services personnel and people with disability to ensure people with disability are kept updated about any emergencies and are adequately and accessibly supported through these situations. | Short term | Federal, state, territory and local |
| Increase funding for a comprehensive suite of telehealth services, particularly in regional, rural and remote areas where consumers face long waits or extensive travel to see a GP or specialist. | Short term | Federal |
| Fund people with disability and not-for-profit organisations to trial and improve the accessibility of new 'real-time' health and wellbeing communications tools (such as apps and social media platforms). | Short term | Federal, state and territory |
| Expand existing training programs to provide education about scams and security for people with disability and older people with accessibility needs. | Short term | Federal |
| Work alongside NBN Co and telecommunications providers to research the most accessible, reliable and resilient backup options for both fixed line and mobile services | Mid term | Federal |
| Implement next generation emergency call service options, including options to direct text, instant message, web or video call to the emergency call service. | Mid term | Federal |

2.6.3. Accessibility of devices

| Strategic action | Timeframe | Government responsible |
|--|------------|------------------------|
| Prioritise the accessibility of communications technologies in the next National Disability Strategy. | Short term | Federal |
| Support and implement the Australian Human Rights Commission's proposals relating to the accessibility of new and emerging technologies, including accessible communications technologies. | Short term | Federal |
| Alongside the Australian Human Rights Commission, call on technology manufacturers and industry representatives to embed human rights (including a human rights-based framework) into the development and use of all existing, new and emerging communications technologies. | Short term | Federal |
| Through the work of the Digital Transformation Agency, ensure the development of a 'whole of government ICT' blueprint (to be submitted to government by the end of 2020) is responsive to the needs of people with disability. | Short term | Federal |

| Strategic action | Timeframe | Government responsible |
|--|------------|-------------------------------------|
| Incorporate AS EN 301 549 'Accessibility requirements suitable for public procurement of ICT products and services' into legislation to improve the accessibility of communications technologies in Australia. | Short term | Federal, state, territory and local |
| Undertake a cost benefit analysis of accessible communications technologies in Australia. This would include both hardware and software, and would include the cost to individual consumers, industry and the Australian economy. | Mid term | Federal |
| Require Australian manufacturers of communications devices to perform extensive user testing of devices, software, applications and platforms with a range of people with disability. | Mid term | Federal |
| Increase funding for in-home support and assistance setting up assistive and mainstream technology (for instance, setting up landline telephones to be used with infrared remotes so that one switch provides independent control of home phones). | Mid term | Federal |

2.6.4. Affordable communications technologies

| Strategic action | Timeframe | Government responsible |
|---|------------|------------------------------|
| Make necessary changes to ensure the NDIA more consistently funds communications technologies (such as iPads, for example) where these are the most appropriate technologies to meet the participant's needs. | Short term | Federal |
| Fund a new affordable home broadband product for consumers on income support payments. | Short term | Federal |
| Support academics and economists to research the cost of the digital divide (cost of being on/offline to both the individual consumer and to different levels of government). | Short term | Federal |
| Draft the terms of operation of a scalable accessible communications device loan scheme operated through public libraries or other community hubs. | Mid term | Federal, state and territory |

2.6.5. Inclusive online environments

| Strategic action | Timeframe | Government responsible |
|---|------------|------------------------------|
| Develop a whole of government National Disability Inclusion Roadmap. ¹⁷ | Short term | Federal, state and territory |
| Ensure all government web content is fully accessible. | Short term | Federal, state and territory |
| Call on industry to improve the accessibility of mainstream apps and software, particularly for core categories of apps, such as those related to communications. | Short term | Federal |
| Incorporate web accessibility requirements into the terms, conditions and contracts of all government funded programs. | Short term | Federal, state and territory |

¹⁷ ADIA 2020 op cit.

| Strategic action | Timeframe | Government responsible |
|---|------------|------------------------|
| Make specific funding available to provide internet access, mobile phones, training and support to people with intellectual disability living in group homes. | Short term | State and territory |
| Call for mandatory curriculum topics regarding accessibility and inclusive design to be included in tertiary and vocational education courses relevant to ICT, technology, computer science, engineering, design, and digital publishing. | Mid term | Federal |

2.6.6. Accessible audio-visual content

| Strategic action | Timeframe | Government responsible |
|---|------------|------------------------|
| Request that the ACMA undertake monitoring of the quality of live captioned programs. | Short term | Federal |
| Fund research into how to improve the quality of live and automated captioning (including direct consultation with people who rely on captioning services). | Short term | Federal |
| <p>Update the Broadcasting Services Act to add necessary accessibility improvements to broadcast and catchup television.</p> <p>This would include:</p> <ul style="list-style-type: none"> - 24/7 captioning on all channels, including multi-channels. - The introduction of permanent audio description on the ABC, SBS, and channels 7, 9 and 10. - The introduction of requirements around verbalising on screen content during emergency broadcasts. - English to Auslan interpreting requirements, with separate requirements for emergency broadcasts, national announcements and standard programming. This would also provide minimum standards around framing for interpreters; interpreter certification levels and the quality of video required to ensure the best accessibility possible. - The introduction of requirements relating to Auslan presented content. - The requirement that accessibility features follow video content across platforms (e.g. where a television show that was broadcast with accessibility features is uploaded to a catchup service or social media site, the accessibility features must follow the video to this platform). - That broadcasters must demonstrate a commitment to providing and improving accessibility features as a precondition for having their broadcasting licenses renewed. | Short term | Federal |
| Create a national task force (comprised of people with disability, communications accessibility experts and providers, and audio-visual | Mid term | Federal |

| Strategic action | Timeframe | Government responsible |
|---|-----------|------------------------|
| content developers and providers) with responsibility for ensuring the accessibility of all audio-visual content screened in Australia. | | |
| Fund research into the role that artificial intelligence may play in creating more accessible video content (e.g. automated captioning, automated/synthetic audio description, Auslan avatars). | Mid term | Federal |

2.6.7. General accessibility

| Strategic action | Timeframe | Government responsible |
|--|------------|------------------------------|
| Ensure all state, territory and federal government employees receive mandatory and regular disability awareness and inclusion training. | Short term | Federal, state and territory |
| Reform the Disability Discrimination Act to allocate sufficient power to the Australian Human Rights Commission for them to perform more effective compliance monitoring, and to ensure that systemic discrimination against people with disability is adequately investigated and remedied. | Short term | Federal |
| Fund research into best practice accessible information, including digital and non-digital forms of written and interpersonal communication. | Short term | Federal |
| Develop relationships with global research centres and technology companies to hold forums, roundtable discussions and lightning talks etc. to help inform the general public about accessible communications technologies, technological aids and assistive tools. | Mid term | Federal |
| Establish an accessibility accreditation system through which organisations, businesses, agencies and other entities could market themselves as accessible for people with disability and accessibility needs. | Mid term | Federal |
| Develop a federal Human Rights Act to ensure broad and inclusive legislated protection of human rights, including in the development and use of new technologies (including communications technologies). | Mid term | Federal |

Governments need to create and support the preconditions of an inclusive society. This means legislative and policy reform to ensure people with disability are genuinely included in all facets of Australian society. All levels of government must model inclusive practice, provide guidance and put in place appropriate funding and supports to facilitate genuine inclusion.

‘One of the key enablers that governments can implement to alleviate digital exclusion and inaccessible communications products and services 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... must be

completely accessible to ensure that people with disability can be actively involved in these processes'.¹⁸

Recommendation 13: Federal, state, territory and local governments must commit to procuring and using digital communications technologies that meet the requirements of AS EN 301 549 'Accessibility requirements suitable for public procurement of ICT products and services'. This commitment must include the development and implementation of a whole-of-government procurement policy for accessible ICT.

Given most government services now require a MyGov account and internet access, it is essential that the federal government takes action to address the digital divide experienced by people who are not digitally included. 'Involving people with disability in the development, design and delivery of online content and services will assist in growing digital inclusion. Another complementary solution is 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.'¹⁹

Recommendation 14: People with disability must be involved in the development, design and delivery of communications technologies and services, including the design and delivery of digital inclusion training programs.

In addition, 'governments should embed accessibility or inclusion requirements into all government contracts.'²⁰ The contracts entered into by all levels of government could require recipients of government funding (including disability-specific and mainstream NGOs, grant recipients, contractors and service providers) to meet minimum, mandatory accessibility standards; to set aside funding to undertake significant user testing with people with disability to ensure the accessibility of their digital and non-digital resources; and to prepare a report for their funding body on how they have implemented accessibility standards and included people with disability in their work.'²¹

Recommendation 15: All governments must embed inclusion into the standard terms and conditions of every government contract. These contracts must outline mandatory accessibility standards that the funding recipient must meet, a requirement to undertake consultation and/or user testing of digital and non-digital resources with people with disability, and a requirement to report on inclusion activities undertaken while receiving government funding.

¹⁸ ACCAN 2020c, *ACCAN submission – WA digital inclusion blueprint*, p4. Available: <http://accan.org.au/our-work/submissions/1812-digital-inclusion-western-australia-blueprint>

¹⁹ Ibid.

²⁰ G3ict 2020 op cit.

²¹ ACCAN 2020a op cit., p27.

2.7. Response to question 7

Question 7: What practical and sustainable steps can non-government institutions, the private sector and communities take to promote a more inclusive society for people with disabilities?

What needs to change:

- A. in attitudes, behaviours, relationships and values;**
- B. in organisations, culture and workforces;**
- C. in service provision;**
- D. in implementation, monitoring, and accountability measures;**
- E. to ensure people with disability are closely consulted with and actively included in all steps to promote a more inclusive society?**

People with disability and community organisations, including Disabled Peoples Organisations, Disability Representative Organisations, advocacy organisations and service providers, all have a role to play in creating and promoting a more inclusive society for people with disability. Indeed, ‘these groups have long been modelling inclusion of people with disability’,²² and their expertise must be acknowledged and drawn upon by other non-government institutions and the private sector.

Businesses also have a key role to play in creating a more inclusive society and making sure that people with disability have access to the mainstream supports and services they require. As such, there needs to be a move away from voluntary guidelines and standards to more mandatory measures requiring accessibility and inclusive design.

‘Small businesses in particular must be adequately supported to make any changes required to improve their accessibility – through, for instance, the creation of local level grants for small businesses to improve the physical accessibility of their buildings, or the accessibility of their digital or non-digital content.’²³

Recommendation 16: Funding and support must be available to small businesses for them to make required accessibility upgrades to ensure they can provide goods and services to people with disability on an equal basis with all others.

2.8. Response to question 8

Question 8: What are the barriers and challenges to inclusion for people with disability? Including for

- A. First Nations people with disability;**
- B. People with disability from culturally and linguistically diverse communities;**
- C. People with disability who identify as LGBTIQ+;**
- D. Women and girls with disability;**
- E. Children and young people with disability;**
- F. People with disability living in rural or remote communities.**

²² Ibid p26.

²³ Ibid p28.

As part of developing our Ideal Accessible Communications Roadmap, ACCAN asked contributors about the current or anticipated communications issues experienced by people with disability in Australia. The responses we received showed that people with disability experience numerous barriers to equitable communications access, and contributors were concerned that these barriers would continue (and in some cases worsen) in the future.

We were told by Roadmap contributors that people with disability do not always have equal access to digital and non-digital information. These barriers to information, including online content, websites and services, include:

- Information not being provided in Easy English, plain English, braille, large print or Auslan (or this type of information being supplied much later than the standard English information).
- Information not being provided in community languages, including languages commonly used by First Nations peoples.
- Audio-visual information not being captioned, audio described or Auslan interpreted.
- CAPTCHA tests making online information and/or services inaccessible.
- Information being provided on inaccessible websites.

‘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 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.’²⁴

These barriers to information are common across many sectors. For instance, barriers to information can also affect participation in cultural life. Limited captioning, audio description and English to Auslan interpretation on broadcast and on-demand television prevents people with disability from fully enjoying their right (as outlined in article 30 of the CRPD) to participate in cultural life, performances and services on an equal basis with others. ACCAN believes that equal participation in cultural life is essential to a fully inclusive society.

Recommendation 17: As outlined in the government-focused action table, amendments must be made to the *Broadcasting Services Act 1992* to mandate the provision of essential accessibility features on broadcast and catchup television. This must include reforms like those provided in the 21st Century Communications and Video Accessibility Act in the United States, which requires access features for video content to follow the video to other platforms.

Another barrier within the communications sector is inaccessible information about plans and contracts. Consumers with disability may purchase inaccessible devices and sign contracts that they don’t understand, nor have the financial ability to pay for. Indeed, contributors to the Roadmap also explained that people with disability are often unable to afford accessible communications technologies and services. Accessible communications technologies (both hardware and software) can be quite expensive and are often unaffordable for people with disability. This creates barriers and can lead to greater inequalities for people with disability, limiting the ability of people with disability to become genuinely digitally included which can have flow on effects to all other parts of their lives.

²⁴ ACCAN 2020c op cit., pp3-4.

As outlined in the Australian Digital Inclusion Index,²⁵ Australians with disability are significantly less digitally included than other Australians. Indeed, the digital inclusion gap experienced by people with disability in Australia has changed very little since data was first collected for the Index in 2014.²⁶ When considering the intersectionality of people with disability and other cohorts that are less digitally included, such as people on low incomes or older people, the levels of digital exclusion are amplified. Communications technologies and digital inclusion must therefore not be overlooked when considering inclusion and what it means to be included in Australian society in 2021.

Furthermore, people living in remote Indigenous communities (RICs) often experience additional barriers to communications products and services. ACCAN recently commissioned the Remote Indigenous Communications Review, which found that there are significant barriers that prevent many First Nations people living in RICs from full or even partial digital engagement.²⁷ The review found gaps in access and use of communications technologies due to lack of last mile delivery or community communications access facilities, as well as issues of affordability and barriers to online engagement. The review also found that some RICs experience serious service reliability and congestion issues, which can contribute to broader societal issues (particularly as service outages affect the use of EFTPOS to buy food).

²⁵ Thomas, J, Barraket, J, Wilson, CK, Holcombe-James, I, Kennedy, J, Rennie, E, Ewing, S, and T MacDonald, 2020. *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020*, RMIT and Swinburne University of Technology, Melbourne, for Telstra. Available: <https://digitalinclusionindex.org.au/>

²⁶ Ibid p20.

²⁷ Featherstone D 2020, *Remote Indigenous Communications Review: Telecommunications Programs and Current Needs for Remote Indigenous Communities*, for ACCAN. Available: <https://accan.org.au/our-work/research/1821-remote-indigenous-communications-review-telecommunications-programs-and-current-needs-for-remoteindigenous-communities>

3. Conclusion

ACCAN would again like to thank the Royal Commission for the opportunity to provide a submission to this important consultation.

As outlined in our submission, ACCAN strongly believes that genuine inclusion requires the full and equal enjoyment of human rights and fundamental freedoms, and that the role of communications technologies and services as enablers of these rights must not be overlooked. Accessible and affordable digital communications technologies are inextricably linked to inclusion and the promotion and protection of the human rights of people with disability across Australia.

ACCAN welcomes any further discussion about the points and recommendations raised in our submission.

4. Appendix - Ideal Accessible Communications in Australia

About this document

This document brings together the initial insights of 35 organisations (including Disabled Peoples Organisations, advocacy groups and disability service providers) and 9 individuals about accessible communications. This feedback was provided between December 2019 and February 2020.

Our hope is that this document will be used by organisations and individuals working to create an accessible communications sector in Australia. This document outlines shared goals to work towards. We believe that achieving each of these shared goals would lead to a fully accessible communications sector in Australia. For this reason, this document should be read by prefacing each bullet point with the phrase 'in an accessible Australia'.

This document could be used as a state, territory or federal election policy platform. It could also be used by civil society to monitor Australian implementation of the Convention on the Rights of Persons with Disabilities.

Our hope is that this document will be used alongside related 'solutions' documents. Using these documents together will help track progress towards the ideal accessible communications landscape, plan advocacy efforts, or realign strategies.

Ideal accessible communications

An ideal accessible communications sector is one in which there are no barriers. People with disability and accessibility needs would have full and equal access to all communications technologies and services. This is in contrast to 'communication access' which refers to interpersonal interactions.

This document views accessibility broadly. We aim to incorporate the experiences and needs of all people with accessibility needs. This includes older people and people with disability from diverse backgrounds, including Aboriginal and Torres Strait Islander people and people from culturally and linguistically diverse backgrounds. We also consider the accessibility needs of people living in rural, regional and remote areas, and those of people experiencing homelessness.

This document considers the communications sector in a comprehensive and inclusive manner. We recognise that increasing convergence means that the category of 'communications' is very broad. In this document we use 'communications' to refer to telecommunications, communications technologies, online services, and broadcasting. This document will be updated periodically to reflect changes in communications technology and options.

4.1. Inclusive telco services

4.1.1. Accessibility of information, plans and contracts

In an accessible Australia:

- All consumers would have free access to information about plans, devices, contracts etc. in a range of accessible formats (such as Easy English, plain English, braille, large print and Auslan resources) to suit their needs.
- At a bare minimum, all public documentation for consumers related to phone and internet services would be available in plain language and key documents would be available in Easy English.
- All consumers would have free access to capacity building programs (provided across a range of accessible channels, including online, face-to-face, telephone and live-chat) that would assist them to set up and get the most out of their communications devices and plans.
- All consumers, particularly older consumers and consumers with disability, would have access to impartial information and any support they require to make a decision about communications technology purchases. The [Accessible Telecoms](#) project would be sustainably funded to continue providing this vital information.
- Telco and internet providers would have transparent accessibility policies to which they are held accountable.
- Consumers would be able to request information, plans, contracts, bills etc. in their preferred method and providers would honour this without charging any additional fees.
- All telcos would provide free directory assistance for customers with print, intellectual or physical disability.

4.1.2. Customer service

In an accessible Australia:

- All telco and internet provider call centre, customer service and frontline staff would be disability aware and would be trained in how to confidently and competently support all consumers with disability or accessibility needs.
- All telco and internet provider call centre, customer service and frontline staff would also receive specific Communication Access training. These staff would be trained in how to communicate in a clear, unambiguous and easy-to-understand manner. They would know how to interact with people with communication disability, actively listen to the person and take time to ensure they understood what was being discussed.
- All telco and internet provider customer service and frontline staff would have a basic understanding of the accessibility features of the devices they sell and how to activate them. In instances where this information and support is required, it would be provided free of charge.

4.1.3. The National Relay Service (NRS)

In an accessible Australia:

- All NRS call options would be available 24/7, would be of high quality and would meet the needs of all NRS users, including the option to be called through the NRS via a direct line.
- The NRS would be resourced to provide suitable call options for people with multiple accessibility needs, such as people who are Deafblind.
- Training and ongoing support would be freely available for all existing and new NRS users who require assistance.
- All businesses and government services would be trained in how to use the NRS, including how to make and accept NRS calls, and would welcome and promote the use of the NRS to their customers.
- All NRS staff would be trained in communication access and would be able to confidently support NRS users with communication disability (not related to hearing loss).
- There would be standards and monitoring around the use of real-time captions for NRS services created using automated speech recognition software in communications technology.

4.2. Safe and reliable communications technologies

4.2.1. Resilient services

In an accessible Australia:

- Accessible communications services would be recognised as essential.
- All communications services would be resilient and reliable across Australia, including in regional, rural and remote areas.

4.2.2. Emergency services

In an accessible Australia:

- Next generation emergency call service options would be freely available. This would include options to direct text, instant message, web or video call Triple Zero. These options would meet and exceed international best practices.
- Information about the use and resiliency of the emergency call service would be available to all consumers in a range of accessible formats.
- Appropriate backups and network resiliency would support all consumers to effectively contact the emergency call service as needed during power outages. This would include the provision of subsidised accessible powerbank services for mobile phones to those who need it.

4.2.3. Health and wellbeing

In an accessible Australia:

- Priority assistance services would be offered by all telco providers at no extra cost. There would be a broader eligibility for priority assistance to recognise that some people with disability and older people may be heavily reliant on connected communications devices.
- The role of communications technology in relation to health and wellbeing would be better understood, particularly in relation to the need for ongoing connection and reliable services for health professionals and their patients.
- Telehealth services would be well funded and would be delivered through reliable infrastructure. This would support service delivery by allied health professionals such as dietitians, speech pathologists, psychologists and physiotherapists and other health professionals by allowing a wider range of interventions and assistance to be offered (for instance, supporting the use of apps to monitor physical activity, or using digital communications technologies to learn how to prepare food).
 - This would include sufficient funds for expert support and supervision of allied health professionals.
 - This would also include training and information for health professionals in how to deliver telehealth services via video remote interpreting.
- Connected devices and greater interoperability and connectivity would reduce social isolation and improve the wellbeing of older people and people with disability.

4.2.4. Scam protection and cyber security

In an accessible Australia:

- Protections would be in place to ensure that scams do not disproportionately impact older people, people with disability, children or people from culturally and linguistically diverse backgrounds.
- All connected devices would be designed according to secure by design principles to ensure maximum privacy for consumers. This would be regulated and subject to independent oversight.

4.3. Accessibility of devices

In an accessible Australia:

- Communications devices and devices that facilitate communications, such as mobile phones, landline phones, tablets, computers and modems, would be inclusive by design and would meet the highest standards of accessibility. These devices would be accessible straight out of the box and people with disability would not need assistance in setting them up.
- People with disability would be involved in the design of communications devices from the earliest stages to ensure these devices appropriately meet the needs of people with varied

accessibility needs. People with disability would be appropriately remunerated for their involvement in this extensive user testing.

- Accessibility and universal design would form part of the mandatory curriculum for tertiary and vocational education courses relevant to science, technology, engineering, design or procurement. People with accessibility needs would be involved in the development and delivery of any such course content.
- The Universal Service Guarantee and enforceable Australian accessibility standards would ensure all products, devices and services are inclusive and accessible for people with disability and accessibility needs. Clear compliance processes would be in place between the public and private sector, both domestically and internationally.
- There would be a whole of government adherence to the updated Australian Standard AS EN 301 549, Accessibility requirements suitable for public procurement of ICT products and services. Regulatory oversight mechanisms would monitor adherence to this standard.

4.4. Affordable communications technology

In an accessible Australia:

- Accessible devices would be more affordable, due to increased public procurement of accessible information and communications technology. This would include the support of the NDIA through their procurement processes.
- Mainstream communications technology and devices would be available for loan through local libraries, or through no interest loans for people who have accessibility needs. Subsidies would also be available to support people with disability and older people to access secure by design connected devices. Such subsidies would have low barriers to entry (e.g. simple and easy to understand forms).
- Mobile and broadband plans would be more affordable for those on low incomes. Internet subsidies would be available for those on the Disability Support Pension or Age Pension (or income support payments generally). Such subsidies would have low barriers to entry (e.g. simple and easy to understand forms).
- Installation and update costs for devices and services would be subsidised or completely covered by industry.
- The funding for mainstream and assistive communications technologies through the NDIS and My Aged Care would be predictable and transparent.
 - In particular, assistive communications technologies would be easier to access through the NDIS and My Aged Care schemes, and people would automatically receive free training on how to use these alongside existing assistive or mainstream communications technologies.
- All consumers would understand what they are paying for in terms of internet, mobile and landline phone coverage, and would be empowered to seek compensation where their service terms were not being met.

4.5. Inclusive online environments

4.5.1. Web accessibility

In an accessible Australia:

- All websites and apps would comply with the highest WCAG standards, and compliance would be routinely monitored. This would include all government websites and apps, as well as all programs, agencies and organisations receiving government funding.
- People with disability (including intellectual disability and people with low literacy) would be actively involved in the development of all apps and websites and in performing user testing to guarantee high standards of accessibility. People with disability would be appropriately remunerated for their involvement in this extensive user testing.
- Web accessibility requirements would be incorporated into the terms and contracts of government grants.
 - For instance, all programs, agencies or organisations receiving government funding would be required to set aside sufficient funds to undertake significant user testing with people with disability to ensure the accessibility of their resources (including their websites and apps). This would include a broad range of people, with a focus on those who typically are not involved in such testing, such as people with intellectual disability and people with communication disability.
- All procurement staff would be trained and fully aware of all accessibility legal frameworks and relevant standards. Adherence to these frameworks and standards would be monitored by sufficient regulatory oversight. People with disability would be employed within both public procurement teams and regulatory bodies to provide an additional layer of accessibility expertise.
- Standards would be developed to ensure online information is provided in a comprehensible and easy-to-understand manner, including via Auslan and Easy English translations. Accessible versions and translations would be provided at the same time as English content.

4.5.2. Digital inclusion training

In an accessible Australia:

- Free, formal training programs would be available to help bridge the digital divide. These would be tailored specifically to meet the diverse accessibility and information needs of all people with disability, including older people with disability.
- Peer education opportunities would be available to teach consumers a range of digital skills. These opportunities would either be funded through the NDIS or would be expanded versions of existing, mainstream digital inclusion programs.

4.5.3. Digital choice

In an accessible Australia:

- All consumers would be afforded full choice and control regarding what services they access in person and what they access online.
 - For instance, consumers would not be forced to apply for a new ID card online if it were more accessible for them to do this in person.
- All consumers would be given choice and control regarding which services and technologies they use. All consumers would be actively supported to transition to new communications technologies where such need arose, with compensation, long lead times and extensive training opportunities provided for any forced transitions.

4.6. Accessible audio-visual content

In an accessible Australia:

- Audio description and captioning would both be available 24/7 on every TV channel (main channels and multi-channels) as well as on online platforms, such as streaming sites, YouTube, and social media videos.
- Auslan interpretation would be provided on every TV channel (main channels, multi-channels, and online platforms).
- Auslan interpretation for emergency announcements and news programs would be mandated under specific legislation (including rebroadcasts of these announcements and programs on different platforms such as streaming services or social media sites).
- There would be a national task force with responsibility for accessible broadcasting, including legislation and associated accessibility policies and procedures for broadcasters to implement.
 - This task force would be comprised of people with disability, communications accessibility experts and providers, and audio-visual content developers and providers.
- Broadcasters would be required to perform regular quality assessments of the accessibility features provided on their channels. This would include live or auto captioning.
- All programs, agencies or organisations receiving government funding would be required to provide captioning, audio description and Auslan versions of all AV materials produced.
 - Specific funding would be made available to facilitate smaller businesses or not-for-profit organisations to meet this requirement.
 - Contractual agreements would stipulate that accessible AV resources must be made available within a prearranged time frame, with clear consequences of noncompliance outlined in contracts.
- Cinemas would routinely screen films with accessible features and would make information about such screenings available in a range of accessible digital and non-digital formats. Cinemas would also keep up to date with international developments in the delivery of accessibility features for all films.
- Advertisers would be required to fully caption their advertisements to ensure that people who rely on captions do not miss out on advertising information.

4.7. General accessibility

In an accessible Australia:

- Accessibility and inclusion would be embedded in government culture and the broader Australian culture and would be viewed as a metric to report against and improve upon each year.
- Transport services, such as trains, buses and planes, would feature accessible announcements (including visual and audio) to ensure all people have sufficient information about where they are and what's going on with any delays or changes.
- Auslan interpreters and other communication supports (including independent advocates and communication tools) would be readily available and sufficiently funded.
- Real-time transcription would be readily available in a range of settings to ensure people have access to all the information they require.
- Information would be provided in fully accessible digital and non-digital formats in all instances.
- Community meetings regarding emergency situations would be entirely accessible, including the provision of hearing loops, Auslan interpreters and live-captioning, as well as audio-described videos and information available in Easy English, braille, large print and a range of other languages.
- The NDIS would ensure all material is offered incorporating accessible communication options, as would all NDIS providers providing supports to participants.
- In order to fully embed accessibility across the board, the Disability Discrimination Act must be strengthened. This should also include accessibility for digital inclusion too.

4.8. Contributors and supporters

This document was written by the Australian Communications Consumer Action Network (ACCAN). Contributors to and supporters of this document include:

- [Able Australia](#)
- [AccessibilityOz](#)
- [Advocacy for Inclusion](#)
- [ADA Australia](#)
- [Allied Health Professions Australia](#)
- [AQA Victoria](#)
- [Australian Sign Language Interpreters' Association](#)
- [Autism SA](#)
- [Blind Citizens Australia](#)
- [Centre for Inclusive Design](#)
- [Combined Pensioners & Superannuants Association](#)
- [Deaf Australia](#)
- [Deaf Services](#)
- [Deafblind Australia](#)

- [Deafness Forum of Australia](#)
- Deb Fullwood
- [Dietitians Association of Australia](#)
- [Down Syndrome Australia](#)
- [Grampians disAbility Advocacy](#)
- [IDEAS](#)
- [Limbs 4 Life](#)
- [People with Disability Australia](#)
- [Physical Disability Council of NSW](#)
- [Pinarc Disability Support](#)
- [Scope Australia](#)
- [Senses Australia](#)
- [Speech Pathology Australia](#)
- [Stroke Foundation](#)
- [Technical Solutions Australia](#)
- [Technology for Ageing and Disability WA](#)
- [The Deaf Society](#)
- [Vision 2020 Australia](#)
- [Youth Disability Advocacy Service](#)