

14 May 2021

Disability Employment Policy Section
Department of Social Services
GPO Box 9820
Canberra ACT 2601
via email: dep@dss.gov.au



Re: National Disability Employment Strategy

The Australian Communications Consumer Action Network (ACCAN) thanks the Department of Social Services (the Department) for the opportunity to contribute to the National Disability Employment Strategy.

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. We represent the views of our broad and diverse membership base, which includes groups such as community legal centres, disability advocacy organisations, indigenous organisations, farmers' federations, financial counsellors, parents' groups, regional organisations, seniors organisations, and other individual members. ACCAN has always been a strong voice for consumers with disability in the communications arena. We are proud to have a wide range of disability organisations as members, and as valuable contributors to and supporters of our work.

ACCAN is pleased that the National Disability Employment Strategy Consultation Paper (the Consultation Paper) outlines that greater workforce participation of people with disability is a driver of economic growth. We agree that there are significant benefits – economic and otherwise – of more people with disability being in paid employment. ACCAN believes that communications technologies are a fundamental cornerstone in increasing the employment of people with disability in Australia. As such, the ten-year commitment made in the National Disability Employment Strategy must include a focus on accessible and affordable communications technologies and services, the procurement of accessible ICT, and digital inclusion of people with disability.

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

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Ideal Accessible Communications Roadmap

In 2019-2020, ACCAN developed an Ideal Accessible Communications Roadmap¹ to illustrate what it would look like if all people with disability in Australia had full and equal access to communications technologies and services. In developing this Roadmap ACCAN sought feedback from a range of organisations supporting people with disability. We asked about the communications issues that were currently affecting people with disability, the communications issues that contributors thought would affect people with disability in the future, and suggestions for possible solutions to address these existing and anticipated communications barriers. Through this broad community engagement, we received responses from 35 organisations, including Disabled Peoples Organisations, advocacy groups and disability service providers, as well as 9 individuals with disability who offered insights independently of any organisation.

The insights offered by contributors illustrate that people with disability encounter a range of barriers to equitable communications access, and there are concerns that these barriers will continue (or worsen) in the future. The Roadmap encompasses the following: the accessibility of telecommunications services and devices, online environments, and audio-visual content; the affordability of communications technologies; and the safety and reliability of communications technologies for people with disability in Australia.

A few Roadmap contributors referenced communications technologies and services in relation to employment or economic participation. Some of the issues they highlighted as affecting people with disability included:

- Lack of awareness about technology-based workplace adjustments.
- Lack of digital skill to search and apply for jobs online.
- Inaccessible information and communications technologies (ICT) used in the workplace.
- Difficulty being contacted by colleagues and clients through the National Relay Service (NRS), as not all call options allow NRS users to be called via a direct line.
- Being unable to afford communications technologies and services, due to the high costs of these products and services alongside the high rates of unemployment of people with disability.
- Being unable to contact government services such as Centrelink due to accessibility barriers (e.g., lack of app accessibility, lack of disability awareness from Centrelink staff, lack of digital skills).

¹ Attached for your reference, and also available on ACCAN's website: <http://accan.org.au/our-work/1765-accessible-comms-roadmap>

Accessible ICT Procurement

ACCAN agrees that ‘inclusive procurement policies and practices can be a powerful motivator to change behaviour and attitudes.’² Furthermore, we believe that inclusive procurement policies that require the procurement of accessible goods and services can support the direct employment of people with disability.

In 2016 Australia adopted the European Standard AS EN 301 549 ‘Accessibility requirements suitable for public procurement of ICT products and services’. This Standard sets accessibility requirements in relation to the procurement of ICT products and services, including software, ICT devices and websites.³ However, despite adopting the Standard and recently updating it to align with the current European Standard, AS EN 301 549 is not yet implemented by all levels of government.

A consistent, whole-of-government commitment to the procurement of accessible ICT would bring significant benefits to people with disability, the economy and society as a whole. As such, ACCAN echoes Vision Australia’s recent recommendation to the Royal Commission into violence, abuse, neglect and exploitation of people with disability: that all levels of Australian government implement robust and consistent policies for accessible ICT procurement, complete with transparent reporting mechanisms and sanctions for non-compliance.⁴

Furthermore, it is worth noting that as part of its Human Rights and Technology project,⁵ the Australian Human Rights Commission recently proposed that:

Federal, state, territory and local governments should commit to using Digital Technology that complies with recognised accessibility standards, currently WCAG 2.1 and Australian Standard EN 301 549, and successor standards. To this end, all Australian governments should:

(a) Adopt an accessible procurement policy, promoting the procurement of goods, services and facilities that use Digital Technology in a way that meets the above accessibility standards. Such a policy would also favour government procurement from entities that implement such accessibility standards in their own activities.

² Consultation Paper, p10.

³ Intopia 2017, *EN 301 549: What it means for Australia*. Available: <https://intopia.digital/articles/en-301-549-australia/>

⁴ Vision Australia 2020, Submission to: Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Employment Issues Paper. Available: <https://www.visionaustralia.org/sites/default/files/2020-09/Vision%20Australia%20Response%20to%20the%20DRC%20issues%20paper%20-%20Employment.docx>

⁵ Information available: <https://tech.humanrights.gov.au/>

(b) Develop policies that increase the availability of accessible communication services such as Easy English versions and human customer supports.⁶

Through mandating accessible ICT procurement, the Australian government would signal to the broader community (including the private sector) that accessibility, inclusion and the rights of people with disability is a priority.⁷ In addition, embedding AS EN 301 549 into a whole-of-government procurement policy would support Australia to meet its obligations under the Convention on the Rights of Persons with Disabilities (CRPD), which requires States Parties to actively research, promote and procure accessible technology for people with disability.⁸

A whole-of-government commitment to the procurement of accessible ICT would support greater educational and employment opportunities for people with disability and would have a huge impact on the accessibility of digital technologies more broadly available in Australia. This in turn could help improve the affordability of such devices and help make communications technologies (and the benefits they bring) more obtainable to people with disability across Australia.

Digital inclusion

People with disability continue to be less digitally included than other cohorts, with the digital inclusion gap experienced by people with disability in Australia changing very little since 2014.⁹ The existing digital divide between those with and without readily available (and affordable) access to online environments and digital communications technologies is further exacerbated by inaccessible ICT, including inaccessible websites. Indeed, contributors to the Roadmap felt that specific and accessible digital inclusion training, targeted to people with disability regardless of their existing digital skills, could help address this digital divide. Contributors also outlined that peer education could be an inclusive and supportive means to deliver this important training. As such, ACCAN recommends that the government commit to funding the development and delivery of free, tailored digital inclusion training programs for people with disability, similar to those run for older people in Australia.

⁶ Australian Human Rights Commission (AHRC) 2019, *Human Rights and Technology: Discussion Paper*, proposal 20. Available: <https://tech.humanrights.gov.au/consultation>

⁷ ACCAN 2013, *Improving the employment participation of people with disability in Australia: Submission to the Department of Education, Employment and Workplace Relations Discussion Paper*. Available:

<http://accan.org.au/our-work/submissions/552-inquiry-into-improving-the-employment-participation-of-people-with-disability-in-australia>; Kaplan, D. 'Chapter 5: Public Financing of Information Technology and Human Rights for People with Disabilities', in J. Lazar and M. A. Stein (eds) *Disability, Human Rights, and Information Technology*, University of Pennsylvania Press, Philadelphia, p77.

⁸ As articulated in article 4 of the CRPD.

⁹ 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, p20. Available: <https://digitalinclusionindex.org.au/>

Given the digital divide and the difficulties that some people with disability experience when accessing online content and services, Roadmap contributors argued that it is essential that people with disability are afforded full choice and control when it comes to online environments. This would include having the opportunity to choose how and through what methods they could access the internet, online services or supports. Online options or services must not be thrust upon people with disability without adequate consultation and training.

Furthermore, Roadmap contributors felt that many ICT designers and developers lacked disability awareness and did not prioritise the involvement of people with disability in these processes. Contributors expressed their desire for people with disability to be involved in the design, development and procurement of accessible communications devices from the earliest possible stage, to ensure that devices appropriately meet the needs of people with varied accessibility needs. This aligns with other feedback ACCAN has received regarding the need for user testing to supplement automated accessibility audits or testing. It is essential that people with disability are involved in this user testing – in addition to ensuring a more robust accessibility audit, this is also an avenue that can lead to paid employment opportunities for people with disability.

ACCAN believes that the National Disability Employment Strategy and the National Disability Strategy must collaboratively implement measures to improve rates of digital inclusion and reduce the digital divide experienced by people with disability. This must include supporting people with disability to develop basic digital skills. In addition, both Strategies must ensure that the experiences and needs of people with disability are embedded within the broader, recently announced Digital Economy Strategy.¹⁰ This must include, for instance, ensuring that the new pilot program for work-based digital cadetships is fully inclusive and actively supports the employment of people with disability, and ensuring that enhancements to myGov and other essential government services meet accessibility standards.

Thank you for the opportunity to feed into the National Disability Employment Strategy. We welcome any additional opportunities to provide input to this Strategy before it is released later this year, so please do not hesitate to contact ACCAN should you require further information about any of the topics raised in our submission.

Yours sincerely,

Meredith Lea
Disability Policy Adviser

Attached: Ideal Accessible Communications Roadmap
ACCAN submission – National Disability Strategy

¹⁰ Media Release available: <https://www.pm.gov.au/media/modern-digital-economy-secure-australias-future>