

Bridging the Digital Divide: Digital Accessibility and Inclusion

16 October 2024

Recommendations

This submission recommends the Future Skills Organisation (**FSO**) considers options to ensure:

- > Tertiary education coursework teaches students about digital inclusion and how to apply accessibility standards and good practice to their future work.
- > Training providers are accessible for all, including access to technology, enrolment, coursework, delivery, placements, and career supports.
- > A national strategy for equity in Vocational Education and Training (**VET**).

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the FSO relating to Digital Accessibility and Inclusion. The FSO supports the VET system's future skills readiness relating to the Finance, Technology and Business (**FTB**) sectors.

Digital inclusion is a critical component of education policy as Australia shifts towards a digital-first society. Australia needs a workforce that can design technology, systems, services and supports to ensure access for the 14.2% of Australians who are highly digitally excluded, and to provide uplift for excluded people and regions.¹ ACCAN supports the FSO's suggested actions to increase digital skills, and provides options in this submission to enhance the planned works.²

¹ Julian Thomas, Anthony McCosker, Sharon Parkinson, Kieran Hegarty, Daniel Featherstone, Jenny Kennedy, Indigo Holcombe-James, Lyndon Ormond-Parker and Lauren Ganley, Measuring Australia's digital divide: Australian digital inclusion index: 2023 (Report, ARC Centre of Excellence for Automated Decision-Making and Society, RMIT University, Swinburne University of Technology, and Telstra, 2023) 10
<https://www.digitalinclusionindex.org.au/wp-content/uploads/2023/07/ADII-2023-Summary_FINAL-Remediated.pdf>

² Future Skills Organisation, *Bridging the digital divide – digital accessibility and inclusion* (Report, 2024) 11.

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**Australian Communications
Consumer Action Network**

Australian Communications Consumer Action Network

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services.

ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

Introduction

Australian ICT students and their future employers are likely to be substantially impacted by global market trends relating to accessibility and inclusion. Europe, Canada and the United States are increasingly requiring accessible products and services by law, with some jurisdictions likely to refuse the importation of inaccessible digital products starting in 2025.³ In Australia, there are already some groups of Australians more likely to be digitally excluded, indicated by factors like age, income, education level, regionality, disability status and First Nations' status.⁴

Subsequently, Australia's ICT workforce needs a robust skill set relating to accessibility standards and digital inclusion, and education and employment pathways must be designed so that people who are likely to be digitally excluded can obtain an education and work.

ACCAN recommends accessibility and digital inclusion are addressed in a comprehensive manner that reaches across VET, industry, state, and federal policy, focusing on:

- Incorporating digital inclusion and standards as core learning.
- Proposing improvements to access, retention, and success initiatives.
- Adopting Universal Design (**UD**) and Universal Design for Learning (**UDL**) approaches.
- Encouraging improvements in national coordination of equity responses in VET.

This type of approach supports digital capability uplift for industry, elevates people at risk of exclusion, and prepares the economy for shifts occurring in overseas and local markets as part of the ongoing social and economic digital transformation.

Digital inclusion and standards as core learning

ACCAN supports the FSO's proposed review of the ICT Training Package. The review should focus on seeking opportunities to make content future-ready and require learning about accessibility and inclusion as a core learning in all relevant courses.

The review should encompass any training package that involves the design, development or deployment of user facing digital technologies, including websites, artificial intelligence (**AI**) and digital products, platforms, and services alongside subjects relating to customer service and interaction.

³ See, for example the accessibility requirements placed on economic operators in Ireland from June 2025, as outlined in Statutory Instruments, *S.I. No. 636 of 2023 – European Union (Accessibility Requirements of Products and Services) Regulations 2023* (Ireland) 19
<<https://www.irishstatutebook.ie/eli/2023/si/636/made/en/pdf>>.

⁴ Australian Digital Inclusion Index, 'Total index', *Digital Inclusion Dashboard* (Web Page, 2022)
<<https://www.digitalinclusionindex.org.au/dashboard/Total.aspx>>.

The scope of the FSO's review should consider:

- The quality of training delivered about accessibility to ensure students can consistently design, build, and evaluate accessible products.
- Australian Standards and international requirements for accessible products and services.⁵
- Opportunities for contributing to Target 17 of the National Agreement on Closing the Gap.⁶
- The impact of AI usage and bias, including options for ameliorating disadvantage perpetuated by AI.
- Options for supporting the digital inclusion of people most identified as at risk of digital exclusion in the Australian Digital Inclusion Index (**ADII**).
- Options to ensure students learn about the importance of lived experience consultation and user testing, when designing, building and deploying technology solutions.
- Ways to ensure customer service subjects include training about creating accessible customer experiences as a core competency.
- Requirements for completion of accessibility and equity-focused subjects as core subjects.

National and international standards and international good practice

During FSO's review of the ICT training package, ACCAN advises expanding the core learning of standards relevant to the creation of accessible digital communications and technologies and of good practice guides relating to inclusion.

This includes, but is not limited to:

- The Disability Discrimination Act (**DDA**).⁷
- The Web Content Accessibility Guidelines (**WCAG**).⁸
- AS EN 301 549 – Accessibility requirements for ICT products and services.⁹
- The latest version the advisory note relating to digital accessibility, under the DDA.¹⁰
- ISO 24495-1 – Plain Language.¹¹
- The good practice guidelines for engaging with people with disability.¹²

ACCAN also encourages the FSO to consider a variety of movements in international markets relating to standards and technology developments that may be useful to teach Australian ICT students and students in telecommunications subjects.

⁵ Noting the broad application of the *European Accessibility Act*, and how this is likely to shift the marketplace for accessible products and services beyond the European Union.

⁶ Australian Government, 'National Agreement on Closing the Gap, 7B. Table B: Outcome 17' (Web Page, 2020) <<https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/7-difference/b-targets/b17>>.

⁷ *Disability Discrimination Act 1992* (Cth)

⁸ W3C, *Essential components of Web Accessibility* (Web Page, 2024) <<https://www.w3.org/WAI/fundamentals/components/>>.

⁹ Standards Australia, 'AS EN 301 549:2020', *Standard* (2020) <<https://www.standards.org.au/standards-catalogue/standard-details?designation=as-en-301-549-2020>>

¹⁰ This is currently under review, as explained in Australian Human Rights Commission, 'Call for submissions: Review of the WWW advisory note.' (Web Page, 2024) <<https://humanrights.gov.au/have-your-say/call-submissions-review-www-advisory-note>>

¹¹ International Organization for Standardization, 'ISO 24495-1:2023', *Standard* (2023) <<https://www.iso.org/standard/78907.html>>

¹² Australian Government, 'Good Practice Guidelines for Engaging with People with Disability' (Web Page, 2024) <<https://www.disabilitygateway.gov.au/good-practice-guidelines>>

Examples of this are:

- The European Accessibility Act, and the way it will impact EU and international markets relating to technology.¹³
- Telecommunications technology and accessibility including Total Conversation, Real Time Text, and next generation emergency services.¹⁴
- Standards and codes relating to telecommunications not yet adopted in the Australian framework, for example the European Electronic Communications Code.¹⁵
- The recommendations from the 2021 report of the Special Rapporteur on the rights of persons with disabilities, focusing on AI.¹⁶

The need for a digital accessibility apprenticeship

The Australian Web Accessibility Initiative (**OZeWAI**) is currently advocating for the creation of a digital accessibility apprenticeship to support the need for skilled accessibility specialists in the workforce.¹⁷ ACCAN supports this, noting the importance of ‘on the job’ training and building skills in real world, practical scenarios and suggests a pilot with industry, underpinned by evaluation to build more recognised skillsets in the field of accessibility.

ACCAN encourages the FSO to propose an industry pilot, in collaboration with a suitable VET provider, basing this on the UK Digital Accessibility Apprenticeship model.¹⁸ This is a practical and necessary workforce intervention which could quickly support a growing field of speciality.

¹³ European Disability Forum, ‘*European Accessibility Act – Toolkit for transposition*’ (Report, 2020)

<https://www.edf-fehp.org/content/uploads/2020/12/final_edf_transposition_toolkit_accessibility_act.pdf>

¹⁴ As explained in European Emergency Number Association, ‘*Implementation of RTT and total conversation in Europe*’ (Report, 2023) <<https://eena.org/knowledge-hub/documents/rtt-and-tc-implementation-in-europe/>>

¹⁵ Journal of the European Union, ‘*Directive (EU) 2018/1972 of the European Parliament and of the Council*’ (Directive, 2018) <<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1972>>

¹⁶ United Nations, ‘*Report of the Special Rapporteur on the rights of persons with Disabilities*’ (Report, 2022) <<https://documents.un.org/doc/undoc/gen/g21/397/00/pdf/g2139700.pdf>> 18-20

¹⁷ Australian Web Accessibility Initiative (OZeWAI), ‘*A year in review*’ (Web Page, 2023) <<https://ozewai.org/blog/newsletter/a-year-in-review-2023/>>

¹⁸ United Kingdom, ‘*Digital Accessibility Specialist (level 4)*’ (Web Page, 2024) <<https://findapprenticeshiptraining.apprenticeships.education.gov.uk/courses/643>>

Accessible training for all: Access, retention, and success

ACCAN encourages systemic responses in the VET sector that ensures students most likely to experience digital exclusion are supported to enrol and succeed. Responses should consider the impacts of the intersection of student experiences, between disability, regionality, First Nations status, students from Low Socio-Economic backgrounds (**LSES**) and other equity cohorts.

National VET data suggest that students from these backgrounds, including students with disability,¹⁹ First Nations students, students from LSES backgrounds and students from Non-English-Speaking Backgrounds (**NESB**) are already less likely to complete their qualifications and less likely to obtain employment post-training compared to peers without these characteristics.²⁰ In a shifting labour market, these gaps have potential to widen without strategic intervention.

The Higher Education sector is aware of these risks and taking action, with an extensive program of reform underway that intends to improve participation and success at university for people from equity backgrounds.²¹ To keep pace with changes in the Higher Education sector, the VET sector also needs a broad strategy that considers disadvantaging factors and provides practical responses to these in an all-inclusive, highly skilled way.

This type of systemic reform could be driven and overseen by the incoming Australian Tertiary Education Commission (**ATEC**), with focus on addressing matters relating to enrolment and success, digital skills, access, and the quality and core nature of training relating to digital inclusion.²²

Enabling programs and supports for digitally excluded students

ACCAN recommends specific, tailored enabling programs and supports that consider the pillars of digital inclusion and address the variety of factors that could lead to digital exclusion and subsequent disengagement or poor outcomes in VET.

For students to succeed, they need basic access to essential skills, items, and services. VET equity and enabling programs have a role to play in supporting students' basic access to:

- Reliable, affordable internet.
- Reliable, affordable devices.
- Inclusive technologies and learning delivery methods.
- Skills and confidence to engage with the digital world.

These matters can be addressed through nationally consistent entry and enabling programs, subsidies, no interest loans, or free devices and connections where required.

¹⁹ The employment gap is substantial for students with disability.

²⁰ National Centre for Vocational Education Research (NCVER), 'Student equity in VET 2021: participation, achievement, and outcomes' (Report, 2021) <<https://www.ncver.edu.au/research-and-statistics/publications/all-publications/student-equity-in-vet-2021-participation,-achievement-and-outcomes>>

²¹ Australian Government, 'Australian Universities Accord Final Report' (Report, 2024) <<https://www.education.gov.au/accord-final-report>>

²² Australian Government, 'Australian Tertiary Education Commission (ATEC) Implementation Consultation Paper' (Report, 2024). <<https://www.education.gov.au/australian-universities-accord/resources/australian-tertiary-education-commission-atec-implementation-consultation-paper>>

ACCAN draws to the attention of the FSO existing initiatives which may be useful to inform the development of enabling programs and strategies relating to digital inclusion:

- The School Student Broadband Initiative (**SSBI**), noting this would benefit from extension to tertiary students and others at risk of digital exclusion.²³
- The National Device Bank, which provides refurbished tablets, laptops and mobile phones to people who are without a device.²⁴
- ACCAN's Accessible Telecoms which provides free advice on communications products and services suitable for seniors and people with disability.²⁵
- ACCAN's affordable device finder.²⁶

Student retention and success initiatives

Tailored programs and initiatives that are inclusive and designed to enable students from equity groups to complete their qualifications and find work are necessary in our VET system. Specialist staff do exist, particularly at TAFE,²⁷ but are usually funded at the state level, or are resultant of dual-sector provider policy or initiatives. Excluding scholarships, examples of targeted equity initiatives consistently available in multiple states are not widespread. Some examples relating to students with disability for example, include:

- Victoria's Disability Transitions Officers, focusing on providing support for students with disability transitioning from school to tertiary education, noting this is not available in other states or territories, and only available at TAFE.²⁸
- The Neurodiversity Hub, deployed at some dual sector institutions focusing on improving the experience of neurodivergent students.²⁹
- The Tafe Specialist Employment Partnerships (**TSEP**) initiative, focused on supporting students with disability into work, available in some locations.³⁰

ACCAN encourages the FSO to engage with the Department of Employment and Workplace Relations (**DEWR**) and the Department of Education to discuss these issues and options and seek a strategic response for equity in VET, potentially through the forming ATEC. The proposed strategy should ensure VET providers (including private providers) are ready and resourced to support students from equity cohorts who are most likely to be digitally excluded.

²³ Department of Infrastructure, Transport, Regional Development, Communications, and the Arts, 'School Student Broadband Initiative (SSBI)' (Web Page, 2024) <<https://www.infrastructure.gov.au/media-communications-arts/internet/national-broadband-network/school-student-broadband-initiative-ssbi>>

²⁴ Good Things Foundation, 'What is the National Device Bank' (Web Page, 2024) <<https://www.goodthingsfoundation.org/our-services/national-device-bank>>

²⁵ Accessible Telecoms, 'About Us' (Web Page, 2024) <<https://www.accessibletelecoms.org.au/about-us.html>>

²⁶ ACCAN, 'Affordable Devices' (Web Page, 2024) <<https://accan.org.au/consumer-information/talking-telco-tip-sheets/your-money-saving-guide/affordable-devices>>

²⁷ See, for example TAFE QLD's Indigenous Student Support Officers (ISSO), as explained in TAFE QLD, 'Information for Aboriginal and Torres Strait Islander People' (Web Page, 2024) <<https://tafeqld.edu.au/information-for/aboriginal-and-torres-strait-islander-people>>

²⁸ GOTAFE, 'Disability Transitions for School Students' (Web Page, 2024) <<https://www.gotafe.vic.edu.au/students/student-services/disability-transitions>>

²⁹ Campus Review, 'CDU supports students, staff with Neurodiverse hub' (Web Page, 2022) <<https://www.campusreview.com.au/2022/08/cdu-supports-students-staff-with-neurodiverse-hub/>>

³⁰ For example, TSEP as explained by TAFE Gippsland, 'Helping students with a Disability get employed sooner' (Web Page, 2020) <https://www.tafegippsland.edu.au/about/mediacentre/2020/helping_students_with_a_disability_get_employed_sooner>

Universal Design and Universal Design for Learning

ACCAN encourages the VET sector to continue to adopt the principles of UD in the physical and digital realms and to continue to adopt a UDL approach to course design and delivery. These approaches seek to design and deliver education that meets the requirements of as many students as possible, without requiring students to request adjustments to delivery methods, platforms, or places.

UDL aims to stimulate interest and motivation in students regardless of their background, presents information in a variety of ways to support learners' knowledge development, and provide diverse ways for students to show that they understand what they are learning and can express what they know. This is achieved by providing multiple means of engagement, multiple means of representation, and multiple means of action and expression.³¹

National coordination of equity responses in VET

Nine out of ten new jobs being created in our economy require a postsecondary education. This means, without intervention, Australia is approaching a challenging workforce environment for already disadvantaged equity groups.³²

This is potentially compounded by limited national focus on supporting systemic linkages and strategic directions in the spaces of access to VET for students from equity backgrounds.³³ Efforts to improve outcomes for VET students from equity groups are often disaggregated at the State level, likely due to the funding make-up of VET,³⁴ or reliant on regional activities or dual-sector participation in targeted initiatives that target the Higher Education system.³⁵

ACCAN advises that a national, data-driven, lived-experience-led, strategic approach to equity in VET can improve training and employment outcomes for disadvantaged students. This approach should support both private and public VET providers to improve their enrolment, retention and career success of students from equity cohorts, leading to greater lived experience participation in communications, technology, finance and business subjects and associated workplaces. At present, nothing like this exists at a national level, however, TAFE Directors Australia (TDA) hosted a forum in 2023 to unpack current issues and share practice.³⁶

³¹ Murawski, W. & Ghandi, K. *What really works with Universal Design for Learning*. (CORWIN, 2019)

³² Australian Government – Jobs and Skills Australia, 'Employment projections for the decade ahead' (Web Page, 2023) <<https://www.jobsandskills.gov.au/publications/towards-national-jobs-and-skills-roadmap-summary/employment-projections-for-the-decade-ahead>>

³³ See, for example the discontinuation of the National Disability Coordination Officer Program in 2023, despite an independent review recommending enhancing the program. As outlined in ORIMA, 'Review of the National Disability Coordination Officer Program' (Report, 2022) <<https://www.education.gov.au/access-and-participation/resources/review-national-disability-coordination-officer-program>>

³⁴ See, for example Queensland Government, 'First Nations Training Strategy', (Web Page, 2024) <<https://desbt.qld.gov.au/training/docs-data/strategies/first-nations-training-strategy>>

³⁵ For example, dual sector institution participation viewable in Neurodiversity Hub, 'Network Partners' (Web Page, 2024). <<https://www.neurodiversityhub.org/#partners-2>>

³⁶ TAFE Directors Australia, 'TAFE Opens Doors.' (Web Page, 2023) <<https://tda.edu.au/events/tafe-opens-doors/>>

Conclusion

ACCAN thanks the FSO for their efforts to improve digital inclusion in Australia. The proposed activities to support uplift in digital skills represent opportunities to ready the future workforce for inclusion and accessibility demands placed on the FTB sectors.

There is also a substantial opportunity to provide uplift, by way of education and paying work, to groups of individuals most likely to be experiencing digital exclusion in these sectors. ACCAN further encourages the FSO to advocate for the development of a national strategy for equity in VET, aiming to support people who are most likely to be digitally excluded to attain a tertiary education and subsequent work. This lived experience is valuable and necessary to support the creation of a more accessible digital future and economy.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP.](#)
