

**From:** Blind Citizens WA  
**To:** [Community Affairs Committee \(SEN\)](#);  
**Subject:** National Disability Strategy: Questions: Blind Citizens WA  
**Date:** Thursday, 28 September 2017 5:07:44 PM

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Dear Ms Gauthier,

Thank you once again for the opportunity to provide information to the Inquiry.

Blind Citizens WA has previously responded to Questions 1 and 6. Blind Citizens Australia's Policy and Advocacy Coordinator Lauren Henley has provided a response to Questions 2 - 5 below. Blind Citizens WA supports these responses.

In addition to BCA's responses -

\* in response to Question 2, Blind Citizens WA believes that government departments need to provide alternatives to online access for people who do not have access to the ICT required or who prefer not to interact with government departments online. Alternatives should include face-to-face and telephone access and should not require long waits or inaccessible menus or queuing systems.

\* in response to Question 4 - Blind Citizens WA has received little information about the National Disability Strategy outside of this Inquiry since its development. We do receive regular information about the WA NDIS and NDIS, which we share with our members.

\* in response to Question 4 - Blind Citizens WA member and Administration and Advocacy Officer Erika Webb is involved in the development of the Wayfinding Standards and we believe that the Standards can make a significant difference to the lives of people who are blind or vision impaired.

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Responses from Blind Citizens Australia....

Question 2:

What action can governments take to ensure that information is provided in an accessible manner?

Despite the Government's endorsement of the Web Content Accessibility Guidelines 2.0 and the subsequent commitment to the Web Accessibility National Transition Strategy in 2010, we are still fighting many of the same battles we've been fighting for decades in the area of online access. These issues are not only confined to well-established agencies with older interfaces that are more difficult to retrofit for accessibility. The National Disability Insurance Agency which is not only a newer agency, but one which is specifically geared towards people with disability, still fails to fully comply with basic accessibility requirements. These issues could be overcome by government departments adopting new recruitment practices for IT and web-related roles which would seek to understand a candidates' level of understanding of web accessibility, and reinforce the fact that accessibility is a critical component of any of these positions. Familiarization with Web accessibility must also form a part of the induction process for all new staff working in IT and web-related roles.

Further, Procurement practices must be updated to ensure accessibility guidelines are mandated as a core requirement for all government requests for tender. Information and communications technology that is procured by government departments continues to create access barriers for people who are blind or vision impaired. These barriers can be both inward and outward facing; preventing people who are blind or vision impaired from obtaining and maintaining work within government, and preventing people who are blind or vision impaired from accessing government services and facilities that are open to the public.

late last year, the Department of Finance announced that Standards Australia had agreed to create an Australian Standard on ICT accessibility through the direct adoption of European Standard EN 301 549. This initiative is intended to provide domestic ICT procurers with set accessibility guidelines, and is an initiative that has been driven by the federal government to ensure that in future, government departments can procure ICT that is accessible to people with disability. The standard has not yet been made mandatory for government procurement. We ultimately need to see broader support for a whole of government policy on accessible ICT procurement at the COAG (Council of Australian Governments) level. The Australian Government must progress the adoption of EN 301 549 as a mandatory standard across all levels of government.

Government departments and agencies must also be aware of, and seek to mitigate issues that may arise during the transition to a new procurement model. ICT developers and suppliers are still catching up to accessibility requirements that have already been mandated overseas. This creates a need for checks and balances to be put in place to ensure compliance with the standards can be achieved over time. The Centre for Excellence in Universal Design has advised that in order for universal design principles to be effectively incorporated into procurement processes, methodologies relating to universal design and disability access must be understood by:

- Senior level management
- Project managers
- Designers and developers
- System administrators
- Content creators (e.g. for websites and intranets) and
- Help desk operatives.

To assist with the above, the Commonwealth government could play a leadership role by:

1. Establishing a central consultative body that can provide technical advice and expertise on issues pertaining to accessibility in the transition to a new procurement model; which includes accessibility as a core requirement for the tender or development of ICT-based services and systems.
2. Directing the APSC (Australian Public Service Commission) Department for Leadership and Learning to Develop and roll out an e-learning module relating to accessible ICT procurement. This module must be completed by public servants who are directly involved in the procurement process across all levels of government. This e-learning module, once refined, could also be extended to the private sector to encourage greater uptake of universal design in procurement.

Finally, Government Departments and agencies must ensure that information is available to people who are blind or vision impaired in accessible formats such as Braille, large print and audio. Appallingly, Many participants of the National Disability Insurance Scheme are still unable to access vital information relating to their own care and support in accessible formats despite the fact that the scheme is now four years old. The same is also true for older people who are blind or vision impaired who are required to interact with the aged care system. Without access to this vital information, people who are blind or vision impaired are unable to ensure their rights are upheld and are placed in an extremely vulnerable position.

Question 3:

What progress do you believe has been made in making communities more inclusive and accessible under the National Disability Strategy?

As Australia's roadmap for the domestic implementation of the Convention on the Rights of Persons with Disabilities, the NDS plays a crucial role in informing government policy on issues affecting the full and equal participation of people with disability across Australia. Regrettably, we do not believe the National Disability Strategy has been effective in bringing about real and lasting change for people who are blind or vision impaired.

Any steps that have been taken to enhance access and inclusion since the NDS came in to effect have been the result of the hard-fought battles of people with disability who have pursued matters under discrimination law. While the NDS is designed to require governments to take proactive steps towards enhancing access and inclusion for people with disability, it has failed to do this for a range of reasons, for example:

- The majority of decision-makers within local, state and federal governments are unaware of the fact that the NDS exists, and do not see its implementation as part of their role.
- No accountability mechanism has been established to require governments to report on the steps that have been taken to implement the measures of the NDS, or to allow people with disability to pursue complaints in instances where a government department's actions do not align with the measures that have been established under the NDS.
- No funding has been allocated to the progressive implementation of the NDS
- Departments are increasingly viewing the National Disability Insurance Scheme as the sole solution to the barriers that are experienced by people with disability

Question 4:

What consultation and communication has your organisation had about the National Disability Strategy with the Commonwealth Government in the last 12 months?

Blind Citizens Australia was informed about the Inquiry into the delivery of outcomes under the National Disability Strategy to build inclusive and accessible communities and subsequently prepared a submission to this inquiry. We have had no other communication with the Commonwealth Government over the past 12 months in regards to issues pertaining to the NDS.

Question 5:

Vision Australia emphasized the need for wayfinding systems in the built environment to increase accessibility. In your view, is this system effective in addressing inclusion?

Adopting a wayfinding standard is not designed to "address" inclusion, as true inclusion will not be achieved until such time that a number of other outstanding issues have been resolved. These issues are outlined in Blind Citizens Australia's submission to this inquiry. The adoption of a wayfinding standard will, however, greatly enhance the inclusion of people who are blind or vision impaired by making it easier and safer for people to navigate their local communities with dignity and independence.

Features such as directional tactile ground surface indicators, (TGSIs), braille and large print signage on doorways and entrances, audible announcements, and braille and large print on lifts, all serve to enable a person who is blind or vision impaired to navigate a building internally.

These measures, along with rapidly developing technology (which can be used in conjunction with smartphones to provide prompts and direction) can allow a person who is blind or vision impaired to conduct their day-to-day business confidently and independently.

Along with the Australian Blindness Forum and a range of other blindness organisations, Blind Citizens Australia has been advocating for the development of a national wayfinding standard for many years; with a view towards this standard being incorporated into the Access to Premises Standards and the National Construction Code. This standard has already been in development for many years, requiring organisations to dedicate many hours to making contributions to this work. Despite these efforts, the government has made no commitment to progress the adoption of the standard to-date. We urge the government to progress the wayfinding standard as a matter of urgency.

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If you require any further information, please do not hesitate to contact us again.

Kind regards,

Deanne

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