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# **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.

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

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### **Inclusive telco services**

## 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 <u>Accessible Telecoms</u> 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.

### **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.

### 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.

# Safe and reliable communications technologies

### **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.

### **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.

### Health and wellbeing

- 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.

### 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.

# **Accessibility of devices**

- 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.

# 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.

### Inclusive online environments

### Web accessibility

- 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.

# **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.

# **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.

### Accessible audio-visual content

- 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, multichannels, 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-forprofit 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.

# **General accessibility**

- 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 audiodescribed 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.

# **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
- <u>Combined Pensioners & Superannuants Association</u>
- 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