

Government 2.0 Taskforce Secretariat
Department of Finance and Deregulation
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AUSTRALIA

By email: submissions@gov2.net.au

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Dear Sir/Madam

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 availability, accessibility and affordability of communications services for all Australians. 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 activate its broad and diverse membership base to campaign to get a better deal for all communications consumers.

We are pleased to provide to the Taskforce our views on how to provide an accessible Gov 2.0 platform. Below are three short notes outlining the role of accessible government procurement, the need for an independent disability equipment program and a discussion of e-accessibility in Government activities. All three of these will have an impact on the success of making Gov 2.0 accessible for people with disabilities. This ensures that Government employees with disabilities can participate in delivering interactive services, that consumers with disabilities have the tools to participate in Gov 2.0 and finally that the tools used in Gov 2.0 are accessible.

Thank you for your consideration of these issues.

Kind regards

Elissa Freeman

Director Policy and Campaigns

Government Procurement & Accessibility

The use of accessibility criteria in government procurement ensures the full participation of employees with disabilities in Gov 2.0. It also creates a powerful incentive for manufacturers to develop accessible products.

Why pursue an accessible procurement policy?

Public procurement policies have been successfully deployed in other countries giving government employees with disabilities accessible information technology, software and equipment. The significant buying power of government agencies creates incentives for manufacturers to develop more accessible products, creating a powerful force in the market with economy-wide benefits.

How has accessible procurement developed internationally?

The USA was the first country to incorporate accessibility into public procurement in 1998. Federal agencies are required to develop, procure, maintain, or use electronic and information technology in a way that ensures the participation of Federal employees with disabilities. The legislation covers all types of mainstream information technology and equipment such as office equipment, desktop computers, telecommunications equipment and software.

The European Union has also included accessibility requirements in its Public Procurement Directive. Further direct guidance on accessibility will be provided through the European Commission mandate (M/376) in the form of standard functional requirements across the European Union.

How is public procurement relevant to the Gov 2.0 Taskforce?

The expanded use of web 2.0 should not discriminate against public sector employees. In order that people with disabilities have the same opportunities in the workplace as other employees, it is essential that all information technology equipment is accessible. Government departments are in a position to set best practice standards and to lead by example.

Why should Australia pursue an accessible procurement policy?

There are important social justice and economic grounds for pursuing an accessible procurement policy. In its *National Inquiry into Employment and Disabilities*, the then Human Rights and Equal Opportunity Commission recommended the government commence the process to adopt accessibility criteria in public procurement policies. Access Economics has estimated that in 2005 the potential lost taxation revenue of people with hearing loss due to their reduced paid workforce participation was \$2 billion.

The US revision of its standards and guidelines and the European Union work under Mandate 376 are working concurrently and referentially to reach harmonised standards. With a far smaller market, Australia is well positioned to utilise these processes in implementing its own accessible procurement arrangements. The failure to implement an accessible procurement could risk Australia becoming the dumping ground for inaccessible products unable to be sold in major markets in North America and Europe. It is a timely opportunity to pursue an accessible procurement policy.

Independent Disability Equipment Program

Affordable access to the right software and hardware will allow consumers with disabilities to participate in government activities over the Internet.

What is the issue?

In Australia, close to one in five people has a disability and the rate is increasing. Concurrently, the era of e-Government has arrived, with governments around the world providing information, services online and, increasingly, interactive consultation spaces. Currently, there is a requirement for Telstra to provide under the Universal Service Obligations, equipment that meets equivalence criteria to voice telephony under the Standard Telephone Service. Firstly, this is only available to Telstra customers or through an unpromoted wholesale arrangement with other carriage service providers. Secondly, it does not cover mobile or software-based communications. This is not adequate for the current communications needs of consumers with disabilities leaving many people without access to affordable and accessible equipment to productively use the Internet for interacting with the Government.

Why is this relevant to Gov 2.0?

The Gov 2.0 taskforce is seeking to make “government information more accessible and usable - to establish a pro-disclosure culture around non-sensitive public sector information”. However this can not be achieved without the capacity for all Australians to participate, including consumers with disabilities. An Independent Disability Equipment Program can ensure that Australians with disabilities are not excluded from government policy and interaction proposed by Gov 2.0. Ensuring people with disabilities can participate in Gov 2.0 upholds the Government’s human rights obligations.

How can this be achieved?

An Independent Disability Equipment Program (IDEP) should adequately address the needs of those with disabilities who seek to participate in Gov 2.0. The IDEP would require:

- An independent disability hardware and software program that is run separate from telecommunications carriers and provides regular equipment updates.
- A technology matching service that would be available for people with severe disabilities who may need particular assistance to find solutions when facing accessibility problems online.
- An outreach service to provide comprehensive information to assist consumers with disabilities in choosing hardware and software to meet their needs.

An IDEP should ensure that consumers with disabilities are able to choose their communications provider based on price and quality of service alone.

In April 2009 the Department of Broadband, Communications and the Digital Economy called for submissions for a feasibility study into an Independent Disability Program. The findings of the study must now be released and its recommendations incorporated in the Gov 2.0 Taskforce.

E-Accessibility for Online Government Services

The Australian Government can make online services more accessible by using technology that meets the needs of people with disabilities.

What is the issue?

At present, there is less than 5 percent of printed material that is accessible for Australians who are vision impaired or have other print disabilities. Accessibility to online services offer enormous opportunities to minimise, or circumvent, such disadvantage. However, people with vision impairment report frustration that they must continually request that government documents are presented online in multiple formats apart from PDF such as RTF, MS Word, and HTML. Blind people benefit from audio description of non-verbal visual video presentations. People who are Deaf or have a hearing impairment need to have captions on any multimedia online interaction. The use of AUSLAN clips for Deaf people for key information material is also necessary.

Why is this relevant to Gov 2.0?

The Gov 2.0 Taskforce is seeking to maximize citizen engagement in interactive online web sites. Yet in order to truly engage as many Australians as possible in online forums, there must be accessibility built in for consumers with disabilities.

Web-based initiatives, such as Gov 2.0 should be developed to accommodate consumers with disabilities as the *Disability Discrimination Act 1992* states “as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community.”

How can this be achieved?

Appropriate measures need to be implemented to allow people with disabilities to efficiently interact with Gov 2.0. Below are only some examples of achieving this:

- The Government should comply with the World Wide Web Consortium (W3C) accessibility guidelines in all applications of Gov 2.0.
- All public Government documents should be available in accessible formats in addition to PDF, to meet the needs of Australians who use older versions of screen reading software.
- Gov 2.0 applications could adopt the use of real-time text as available in Google Wave, to address the needs of Deaf people and people with hearing impairments.