

HUMAN RIGHTS AND TECHNOLOGY PROJECT DISCUSSION PAPER

SUBMISSION FORM

Your name or organisation: Vision Australia

You can use this form to respond to some or all of the proposals and questions in the Discussion Paper.

Please enter your response below the proposal or question you want to comment on.

PART D: ACCESSIBLE TECHNOLOGY

Chapter 9: The right to access technology

Proposal 20: 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 accessible goods, services and facilities that use Digital Technology in a way that meets the above accessibility standards. Such a policy also would favour government procurement from entities that implement accessibility standards in their own activities.
- b) Develop policies that increase the availability of accessible communication services such as Easy English versions and human customer supports.

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Proposal 21: The Australian Government should conduct an inquiry into compliance by industry with accessibility standards such as WCAG 2.1 and Australian Standard EN 301 549. Incentives for compliance with standards could include changes relating to taxation, grants and procurement, research and design, and the promotion of good practices by industry.

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Any such inquiry should also include educational institutions such as universities, and cover technologies used in the design and delivery of courses offered by these providers.

We do not believe that incentives for compliance with standards will, by themselves, be enough to increase the overall level of compliance. There must also be disincentives or penalties for non-compliance, such as increased taxes or lack of access to government funding sources and tendering processes.

Proposal 22: The Australian Government should amend the *Broadcasting Services Act 1992* (Cth) to require national broadcasting services, commercial broadcasting services, and subscription broadcasting services to:

- a) audio describe content for a minimum of 14 hours per week for each channel, with annual increases
- b) increase the minimum weekly hours of captioned content on an annual basis.

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Proposal 23: Standards Australia should develop an Australian Standard or Technical Specification that covers the provision of accessible information, instructional and training materials to accompany consumer goods, in consultation with people with disability and other interested parties.

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A separate related proposal should be included for the development of a standard to cover the provision of instructional materials provided by universities and other educational institutions.

An additional proposal: The lack of accessibility of all Australian Standards developed by Standards Australia, and especially those that have a direct impact on people with a disability, continues to be a source of considerable frustration for us and our community. The Australian Government should require that Standards Australia ensure that any and all standards that it develops which have a particular relevance for people with disability are made available in a range of formats that are accessible to people who are blind or have low vision, and that consultation mechanisms used by Standards Australia during the

development of such standards are also accessible to people with a disability, including people who are blind or have low vision.

Proposal 24: The National Broadband Network should undertake economic modelling for the provision of a concessional wholesale broadband rate for people with disability who are financially vulnerable.

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Question G: What other measures could the private sector take to eliminate barriers to accessibility related to the affordability of Digital Technologies for people with disability?

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Chapter 10: Design, education and capacity building

Proposal 25: The Council of Australian Governments Disability Reform Council should:

- a) lead a process for Australia's federal, state and territory governments to commit to adopting and promoting 'human rights by design' in the development and delivery of government services using Digital Technologies, and monitor progress in achieving this aim
- b) include policy action to improve access to digital and other technologies for people with disability as a priority in the next National Disability Strategy.

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Proposal 26: Providers of tertiary and vocational education should include the principles of 'human rights by design' in relevant degree and other courses in science, technology and engineering. With appropriate support, the Australian Council of Learned Academies should undertake consultation on how to achieve this aim most effectively and appropriately within the tertiary and vocational sector.

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Vision Australia's [research report online but off track](#) shows that there are significant barriers caused for university students who are blind or have low vision by inaccessible online platforms used by universities, insufficient knowledge and training of disability advisors, and unwillingness of lecturers to adapt course content and delivery to be inclusive of people with diverse needs. This proposal should therefore be extended to require education providers to include the principles of human rights-based and inclusive design in the development and delivery of all courses.

Proposal 27: Professional accreditation bodies for engineering, science and technology should consider introducing mandatory training on 'human rights by design' as part of continuing professional development.

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Proposal 28: The Australian Government should commission an organisation to lead the national development and delivery of education, training, accreditation, and capacity building for accessible technology for people with disability.

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Question H: What other tertiary or vocational courses, if any, should include instruction on 'human rights by design'?

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Chapter 11: Legal protections

Proposal 29: The Attorney-General of Australia should develop a Digital Communication Technology Standard under section 31 of the *Disability Discrimination Act 1992* (Cth). In developing this new Standard, the Attorney-General should consult widely, especially with people with disability and the technology sector. The proposed Standard should apply to the provision of publicly available goods, services and facilities that are primarily used for

communication, including those that employ Digital Technologies such as information communication technology, virtual reality and augmented reality.

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Question I: Should the Australian Government develop other types of Standards, for Digital Technologies, under the *Disability Discrimination Act 1992* (Cth)? If so, what should they cover?

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