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**Vision Australia Submission to Consultation: Digital ID (Accreditation) Rules and Digital ID Rules and Accreditation Standards**

Submission to: Commonwealth Department of Finance

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# Introduction

Vision Australia is providing this short submission to the consultation on the Digital ID (Accreditation) Rules, Digital ID Rules, and Digital ID (Accreditation) Data Standards primarily to reiterate the comments that we made during the consultation on the Digital ID Bill in October 2023. At the same time, we commend the Department of Finance for their initiative in fostering consultation and discussion about the inclusive opportunities offered by Australia’s new and evolving digital ID framework, and we look forward to participating in further discussions with them and other stakeholders.

As we noted in our previous submission, people who are blind or have low vision are encountering increasing challenges with traditional forms of ID. The most universal of those forms of ID is a driver’s licence which, of course, people who are blind or have low vision do not have and cannot obtain. Alternatives such as the State-based Photo Cards are not equivalent to a driver’s licence and are not as widely accepted. There are even situations where a passport is not regarded as an acceptable form of ID.

Vision Australia is therefore strongly supportive of the digital ID framework that comprises the Digital ID Act, the Digital ID Rules, the Digital ID (Accreditation) Rules, and the Digital ID (Accreditation) Data Standards. We are encouraged by the attention paid to access and inclusion in the Rules and Standards. Nevertheless, it will be essential for that focus to be maintained in practice as the framework is implemented, otherwise the impact on people who are blind or have low vision will be to make it even more challenging to obtain and use acceptable forms of ID.

# Taking Reasonable Steps

Accreditation Rule 4.49 requires accredited entities to report periodically on the “reasonable steps” they have taken and are proposing to take to ensure that their services are accessible and inclusive. Accreditation Rule 4.50 (b) requires them to “take reasonable steps” to make information about their public-facing services available in multiple accessible formats.

S1.6 of the Accreditation Rules provides some general guidance about how to interpret the phrase “take reasonable steps”. It will be necessary, however, for the Digital ID Regulator to develop guidance for specific activities. For example, in relation to Accreditation Rule 4.50, we would expect “take reasonable steps” to include an obligation for accredited entities to engage with the disability sector to become familiar with accessible formats in general, and to determine the most effective and efficient ways of producing and promoting them in the context of their public-facing services. We strongly encourage the Regulator to establish mechanisms for its own ongoing engagement with the disability sector to develop appropriate guidance materials dealing with access and inclusion for accredited entities.

# Compliance with Web Content Accessibility Guidelines (WCAG)

We are very encouraged that compliance with WCAG is a requirement for accredited entities. We note that S1.4 of the Accreditation Rules (“Definitions”) defines “WCAG” to mean the Web Content Accessibility Guidelines Version 2.2. However, elsewhere in the Accreditation Rules (3.15, 4.50(2), 4.50(3)) there are references to Version 2.1 as the benchmark for compliance. In other places (e.g., S4.51) the reference is to “the WCAG”, which would imply Version 2.2 as formally defined in S1.4. Either the reference in S1.4 should be to Version 2.1, or, alternatively, other references should be to Version 2.2. Given the rapidly evolving nature of digital technologies and standards, our view is that Version 2.2 of the WCAG should be referenced throughout.

We also note that the Web Accessibility Advisory Notes produced by the Australian Human Rights Commission and referenced in S4.51 of the Accreditation Rules are currently undergoing a substantial revision. If the update is completed before the Accreditation Rules are finalised, we recommend including a reference to the updated version, since it will incorporate new content to reflect changes in technologies since the previous version of the Advisory Notes was published.

# Alternative Proofing

In our previous submission we drew attention to a number of factors that would limit the uptake of the new digital ID by people who are blind or have low vision. While most people in the under-65 age group have a smartphone and use it for various tasks, the figure drops to 31% in the 75+ age group. This is an increase from approximately 17% in 2015, but still much lower than for the rest of the community.

Even among people who have a smartphone that is compatible with digital ID requirements, it is likely that not everyone will decide to participate in the digital ID framework. Based on past experience, including with Government apps, some people will be hesitant to use an app in case it is or becomes inaccessible, while others will have concerns about the privacy of their data.

In any case, it will be essential for alternatives to the digital ID system to be accessible, equitable and inclusive at the outset, and to maintain this focus as the framework evolves. The same need for trust-building among the blind and low vision community that applies to the digital ID framework as a whole also applies to any alternative proofing mechanisms that are developed.

# Resources and Community Education

Our strong view is that provided the digital ID framework retains access and inclusion as a fundamental focus, it will offer significant benefits to the blind and low vision community. However, those benefits will not be immediately apparent to everyone, and it will be necessary for the Government to work closely with Vision Australia and other organisations to develop appropriate and accessible resources, and to raise awareness about the framework and educate our community in its use. It is important to understand that resources must be targeted to specific disability groups, and that what is appropriate for one group is not necessarily appropriate for another. Unless there is targeted consultation and co-design of resources and related activities, the potential benefits of the framework could be substantially undermined.

# Other Opportunities for Reform

We reiterate comments we made in our previous submission about the need for reform of the current ID system, notwithstanding the introduction of the digital ID framework. We continue to receive feedback from clients about the difficulties they are experiencing due to inequities in current ID requirements. We have already referred to disparities between a driver’s licence and photo/proof of age cards, which disadvantage people who are blind or have low vision. Even if a person has a passport, there are situations in which that is still insufficient to meet ID requirements (the Working with Children check is one especially perverse example, as we noted in our previous submission).

# Conclusion

The release of the Final Report of the Disability Royal Commission heralds a renewed focus on disability by all levels of society, founded on a rights-based model of access and inclusion. The Commissioners outlined a noble vision for the future:

*“a future where people with disability live free from violence, abuse, neglect and exploitation; human rights are protected; and individuals live with dignity, equality and respect, can take risks, and develop and fulfil their potential.”*

Making this vision a reality will be the task of a generation: a task that has already begun but which will require commitment, dedication, and passion to complete. Through legislation, policies, practices, products and services, governments can provide leadership in refracting everything they do and say through a disability prism.

The digital ID framework provides an excellent opportunity to reflect this vision by helping to remove ghettos of digital exclusion. People with a disability, including people who are blind or have low vision, will benefit along with the rest of the community, but only if access and inclusion remain foundational and integral to the new system as it evolves in practice. We look forward to being part of ongoing discussions and to contributing our expertise in the service of our community.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses, and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.