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**Vision Australia Submission: NSW Department of Customer Service - Disability Inclusion Action Plan**

Submission to: NSW Department of Customer Service

Submitted online to: <https://www.haveyoursay.nsw.gov.au/disability-inclusion>

Date: 20 September 2024

Submission approved by: Chris Edwards, Director Government Relations, Advocacy, NDIS and Aged Care, Vision Australia

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## Introduction

Vision Australia is providing this submission to the consultation on the NSW Department of Customer Service Disability Inclusion Action Plan (DIAP) to emphasise the need for the Plan to give a high priority to digital inclusion for people who are blind or have low vision, and also to provide feedback on our experiences of what has worked well and what has not, from the perspective of our clients who are blind or have low vision.

In preparing this submission we are mindful of the relevance of the Final Report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. The report articulates an inspiring vision of an Australia that is truly inclusive of people with disability:

“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.”

Fundamental to the realisation of this vision is the incorporation into all areas of society of a positive duty to eliminate discrimination. The Commission explains:

“Achieving substantive equality requires more than making adjustments for one person. Positive action is required to remove systemic barriers. It means shifting the focus from a reactive model to one of preventing and eliminating systemic barriers for people with disability more broadly.”

Throughout its 12-volume report, the Disability Royal Commission highlighted the importance of accessible and inclusive information and communications. Recommendation 6.1 calls for the development of a national plan to promote accessible information and communications:

“The Australian Government and State and Territory governments should develop and agree on an Associated Plan in connection with Australia’s Disability Strategy 2021–2031 to improve the accessibility of information and communications for people with disability. The Associated Plan should be co-designed with people with disability and their representative organisations. It should be finalised by the end of 2024.”

Given the universal use of digital platforms, channels, devices and content in the delivery of information of all kinds and in communications generally, it is obvious that this recommendation must be key to any disability inclusion action plan developed by any government department or agency. Service NSW, as the gateway for access to many NSW government services and programs, has a particular responsibility to ensure that its processes and policies are fully inclusive, and so we recommend that in reviewing its DIAP the Department comprehensively consider the extent to which it aligns with all the Recommendations in the DRC’s final report in general, and with those relating to information and communications in particular.

## Identity Verification

The increasing digitisation of society has been accompanied by a corresponding growth in digital identity theft. Mitigation strategies rely on greater stringency in identity verification, and an unintended consequence has been the creation of identify verification processes that are either completely inaccessible or very difficult to access by people who are blind or have low vision.

In 2022 we were contacted by a client who is blind. He reported that he had attempted to contact Service NSW by phone to discuss a particular issue, but was unable to meet identity verification requirements because he was not able to repeat his Medicare number. He had arranged for a family member to be present with him during his phone call, but the Service NSW representative would not accept the validity of the client’s Medicare number when read back by the family member. The client had no means of reading his Medicare number himself, and the Service NSW representative had no solution to the problem. The client was left feeling frustrated, humiliated, excluded, and unable to resolve the original issue.

When Vision Australia followed up on the client’s behalf, Service NSW acknowledged that in developing policies related to identity verification they had not given any thought at all to whether a person who is blind or has low vision would be able to comply with them, or what alternative adjustments might be needed in particular cases. They also confirmed that they would not accept a Medicare number if it were to be read out by the synthetic voice in screen-reading software, which is used by many people who are blind or have low vision to access information stored on digital devices. There has been no follow-up with Vision Australia since this conversation in 2022, so we do not know whether identify verification policies have been revised to make it possible for people who are blind or have low vision to comply with them.

If there had been even a modest amount of consultation between Service NSW and the blindness and low vision sector it would have quickly become apparent that mechanisms would need to be developed to allow a person who is blind or has low vision to verify their identity over the phone. While Service NSW and the Department of Customer Service more generally may not have specific expertise in anticipating the needs of people who are blind or have low vision, Vision Australia certainly does, in our capacity as the largest national provider of services to Australians who are blind or have low vision.

A key focus of the DIAP must therefore be on consultation and co-design with the disability sector of policies and processes that will have an impact on how customers interact with the Department.

## Example of Good Practice

On the other hand, the benefits of ongoing consultation have been clearly demonstrated in the development of the NSW Digital Birth Certificate. Vision Australia was originally contacted by the team within the Department of Customer Service to discuss how we could collaborate on ensuring that the Digital Birth Certificate was accessible to people who are blind or have low vision. Over an extended period of time, we had regular meetings and discussions, and Vision Australia worked closely with the Department in testing beta versions of the Digital Birth Certificate app. By May 2024 we were able to assist the Department to promote a trial of the app to 200 Vision Australia clients who are blind or have low vision.

As noted previously, identity verification is proving to be an increasing challenge for people who are blind or have low vision, and the successful trial of the Digital Birth Certificate is likely to bring significant benefits by making identity verification more accessible. We believe that the close and ongoing consultation and collaboration demonstrated by the development of the Digital Birth Certificate should serve as a model for how the DIAP will promote digital inclusion through consultation and co-design with the disability sector.

**Need for the DIAP to Foster In-House Capacity Building**

While it is essential for the Department’s DIAP to drive ongoing consultation with the disability sector in the development and implementation of digital inclusion strategies, it is also important for the DIAP to foster the Department’s own capacity to incorporate accessibility into the design and delivery of their products and services. Especially in the digital space, accessible inclusion does not occur by accident: it must be planned from the outset and monitored closely during the life of digital products and services. We have seen examples of government apps that were initially designed to be accessible to people who are blind or have low vision, but whose accessibility was broken as the result of ill-conceived and untested updates.

Although specialist expertise is required to design digital content such as apps and websites in compliance with recognised accessibility standards, there is much basic accessibility testing and evaluation that can be done without specialist expertise. For example, every iPhone and iPad incorporates the Voiceover screen-reader and Zoom screen magnifier, so anyone with access to an iPhone can experience how an app will be interpreted by people who are blind or have low vision. In many cases it quickly becomes apparent even to an untrained user if an app is not accessible using Voiceover or Zoom, and costly mistakes can be prevented.

The DIAP must therefore be seen as an important vehicle for fostering the Department’s capacity to undertake basic accessibility design and testing, and the confidence to assess the accessibility claims of their own developers and third-party contractors. Asking and answering questions such as, “is this app accessible to Voiceover users”, “how will a person who is blind or has low vision be able to comply with this policy”, “will people with a disability be able to receive and interpret this information or communication”, and “does this website update comply with accessibility standards” must become “business as usual” for all staff involved with the Department’s digital products and services. Without this, accessibility failures will not only continue but are likely to proliferate as digitisation increases.

## The DIAP’s Role in Driving Whole-of-Government Change

Because Service NSW is the point of first contact for accessing many NSW Government services and programs, it is uniquely placed to identify gaps in accessibility or suboptimal processes across government that have a negative impact on customers who are blind or have low vision. A particularly frustrating example for many of our clients is the need to have multiple photos taken in order to access different services: the Vision Impaired Person’s Travel Pass requires one photo, the Accessible Perking Permit requires another, the Taxi Transport Subsidy Scheme requires yet another, and the NSW Government Photo Card requires still another photo. Many of our clients visit a Service NSW centre to have these photos taken, and they must all be taken separately as there is no capacity for different government departments or even different sections in the same department to share photos, even if they were to obtain the customer’s consent to do so. Moreover, all of these services expire periodically, so customers must engage in an endless cycle of photo-taking.

The result is unnecessary duplication, much wasted time, and a continuation of inefficient processes that benefit no-one. We are aware of other examples of where people who are blind or have low vision face barriers in accessing government services, including identity verification processes that assume a driver licence, which people who are blind or have low vision do not have.

We believe that the DIAP has an important role to play in encouraging the Department in general and Service NSW in particular to engage with other NSW Government Departments and escalate issues requiring policy change when it becomes aware of processes that warrant review in the interests of greater accessibility, amenity and convenience for people who are blind or have low vision. The DIAP must incorporate measures that promote a culture of continuous improvement, beginning within the Department of Customer Service and Service NSW but extending to other NSW Government departments and agencies.

**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.