

**ABF response to Productivity Commission Issues Paper:
Human Services – Identifying Sectors for reform
July 2016**

About the Australian Blindness Forum

The Australian Blindness Forum is the peak body representing blindness, low vision and rehabilitation in the blindness sector. ABF was formed in 1992 and is funded only by its members. ABF is an Australian public company limited by guarantee and governed by a Board of Directors.

Membership of ABF is open to any organisation that has as its primary objects the provision of services to people who are blind or vision impaired, or whose activities are substantially connected with the welfare of people who are blind or vision impaired. ABF is represented in every state and territory of Australia. All major organisations providing services to Australians who are blind or vision impaired are members of ABF.

As Australia's representative to the World Blind Union, the ABF has strong connections with the international blind and vision impaired community.

ABF comprises 15 blindness sector organisations whose expertise and knowledge are reflected in the following comments.

Background

ABF appreciates the opportunity to provide a response to the Productivity Commission Issues Paper: Human Services – Identifying sectors for reform (Issues Paper).

ABF understands that the purpose of this first stage of the PC Inquiry into Human Services is to identify services within the human services sector that are best suited to the introduction of greater competition, contestability and user choices.

ABF notes in the Issues Paper it was stated that the *Competition Policy Review* recommended that 'governments should, wherever possible, put user choice at the heart of human services delivery as users are best placed to make choices about the services they need'¹. ABF supports this statement but submits that it is imperative that in order for users or consumers to be able to make a choice about the human services they require, **they need to be able to access all relevant information in the format of their choice.**

ABF and its member organisations believe that, in accordance with the United Nations Convention on the Rights of Persons with Disabilities, the *Disability Services Act 1986*, the *Disability Discrimination Act 1992* and basic human rights, people who are blind or vision impaired are entitled to the same access to information and

¹¹ Productivity Commission Issues Paper – Human Services: Identifying sectors for reform June 2016, p. 1

materials as all Australians. The UNCRPD specifically recognises (under Article 9² and Article 21³) that access to information, communications and services (including the internet) is a human right.

Equitable access to information and materials is vital to the acquisition of literacy and numeracy and to the ability to participate in recreation, community activities, education and training, employment and daily living.

Changing technology has made equitable access to information and materials attainable in a timely manner. To optimise the benefits of this, there is a need for legislative, technological and financial barriers to information access to be overcome.

ABF makes the following comments as an overarching comment for the PC to consider in its inquiry.

Ultimately, ABF is of the view that those human services that can improve access to information for people with disability, such as people who are blind or vision impaired, will be best suited to the increased application of competition, contestability and, most importantly, informed user choice.

Access to information

People who are blind or vision impaired are consumers of many human services including health, education, community services, job services, social housing, aged care and disability services.

As stated above, there is increasing discussion about the importance of people being informed consumers of human services. The concept of an informed consumer relies on free and open access to relevant information; however, this is something which is routinely denied to people who are blind or vision impaired. People who are blind or vision impaired face many barriers in independently accessing information and materials. These barriers include physical facilities, inaccessible websites and a lack of materials in alternative formats.

Recommendations

All human services need to ensure there are no barriers to people who are blind or vision impaired accessing information and materials. This includes ensuring the following:

- **accessible materials** – providing materials in an individual's format of choice. Alternative formats are those that enable a person who is blind or vision impaired to access written materials, for example, through audio, large print, Braille, electronic media and audio description.
- **accessible websites** – ensuring all websites comply with Web Content Accessibility Guidelines 2.0 endorsed by the Australian Government in 2010. These guidelines provide a standard to apply in making the web accessible to people with disability and older people. In addition, any materials or forms on

²United Nations Convention on the Rights of Persons with Disability, Article 9, <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html>

³United Nations Convention on the Rights of Persons with Disability, Article 21, <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-21-freedom-of-expression-and-opinion-and-access-to-information.html>

websites also need to have “printables” – that is printable documents should the consumer prefer to access the material that way.

- **accessible software** – any software that is used or required to be used by a consumer must be accessible to those who are blind or vision impaired.
- **accessible online services or payments** – human services need to ensure there are no barriers to people making or accepting payments or information online. It is important that organisations also have hard copy or telephone options, particularly for someone who is blind or vision impaired of an older generation who may not be comfortable with online services.

Government Procurement

Digital Service Standard

ABF notes that the Digital Transformation Office released a Digital Service Standard in May 2016⁴ that applies to all new or redesigned government services. Accessibility is one of the key standards listed in this document.

Item 9 of the standard says:

‘Make it accessible’ – Ensure the service is accessible to all users regardless of their ability and environment.

This standard needs to be applied to all human services in Australia and compliance with this standard, as a minimum, would constitute improved human services through improved quality, equity, efficiency, responsiveness and accountability.

Universal design

Promotion of Universal Design is also required across all sectors of society. Universal Design principles improve access and reduce need for specialist adaptive support and/or costly retro-fitting. ABF notes the *National Disability Strategy 2010-2020* explicitly states that one of its Areas for Future Action is

“1.7 Promote principles of universal design principles in procurement”⁵

In order to encourage universal design, it is imperative that Government adopt a procurement policy that any equipment, software systems or facilities purchased, rented or leased for human services are accessible to people who are blind or vision impaired. This will ensure improved human services.⁶

Further consultation

ABF recommends the PC consults with a variety of groups on the needs of people with disability within the human services sector. This would include consulting:

- consumer interest groups including disability groups
- accessibility experts.

⁴ Digital Transformation Office, Digital Services Standard, <https://www.dto.gov.au/standard/>

⁵ National Disability Strategy 2010-2020, p.35, Commonwealth of Australia, Canberra, <https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/national-disability-strategy-2010-2020>

⁶ Further information about Universal Design can be found at: <http://universaldesignaustralia.net.au/>.