

9 February 2017

Human Services inquiry  
Productivity Commission  
Locked Bag 2, Collins Street East  
Melbourne VIC 8003

## **ABF submission to Reforms to Human Services – Productivity Commission Issues Paper**

Thank you for the opportunity to respond to the Issues Paper. ABF is the peak body representing the blindness and vision impairment sector. As a member-based organisation, we have drawn on input from our membership to formulate a response to the Issues Paper, with particular emphasis on the implications for Australians who are blind or vision impaired.

As stated in its previous submissions, ABF supports the general intention underpinning the PC's Inquiry into Human Services to put user choice first in relation to the delivery of human services. However, ABF reiterates its statement from its first submission to this Inquiry, that it is imperative that in order for users or consumers to be able to make an informed choice about the human services they require, they must be able to access all relevant information in the format of their choice.

This specifically relates to one part of the terms of reference relating to stage two of the inquiry where the PC is to consider:

*the factors affecting consumers' use of services and their preferences for models of service delivery, noting the challenges facing consumers with complex and chronic needs, or reduced capacity to make informed choices<sup>1</sup>.*

People who are blind or vision impaired face many barriers in independently accessing information and materials. Therefore, it is vital that the reforms include improving access to information for people with disability, such as people who are blind or vision impaired, to ensure there is true informed user choice.

ABF notes there are several *Requests for Information* in the Issues Report that refer directly to two issues of interest to ABF:

- Access to information
- Information technology, other systems and procurement

ABF has the following comments on these two areas that relate to many of the *Requests for Information*.

### **Access to information**

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<sup>1</sup>Productivity Commission, *Reforms to Human Services – Productivity Commission Issues Report*, December 2016, p.IV, para 2(b)(ii).

Several *Requests for Information* in the Issues Paper are seeking views on the supports needed for users to exercise informed choice through user oriented information to support choice and safeguard users.

ABF fully supports any measures that assist consumers in accessing high quality, consumer-oriented information in order to address any information asymmetries and promote informed consumer choice. However, for people who are blind or vision impaired, it is essential that these human services provide this information to consumers in a format of their choice that they can read. This includes formats such as audio, large print, Braille and electronic media.

ABF and its member organisations believe that, in accordance with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the *Disability Services Act 1986*, the *Disability Discrimination Act 1992*, the National Disability Strategy 2010-2020, and basic human rights, people who are blind or vision impaired are entitled to the same access to information and materials as all Australians. The UNCRPD specifically recognises (under Article 9<sup>2</sup> and Article 21<sup>3</sup>) that access to information, communications and services (including the internet) is a human right.

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.

## **Information technology, other systems and procurement**

Several *Requests for Information* in the Issues Paper are seeking views on the design of information technology and other systems as well as the design of tender processes and management of contracts to support implementation of the reforms.

Any design processes, procurement contracts or tender processes for information technology and other systems must include accessibility not only of information but software and any future physical or hardware systems such as Medicare cards, e-tags etc. 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.

As stated in a previous submission, the Department of Finance recently announced that Standards Australia has agreed to create an Australian Standard on ICT accessibility through the direct text adoption of the European Standard (EN 301 549).

The Department of Finance said that the “standard will support access to ICT for people with disabilities and provide domestic ICT procurers with accessibility guidelines and certainty...Once adopted, the Australian standard can be used when determining technical specifications for the procurement of accessible ICT products and services. This includes generic requirements, ICT with video, ICT with 2-way voice, hardware, web content, software and documentation and support services.”<sup>4</sup>

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<sup>2</sup>United 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>

<sup>3</sup> United 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>

<sup>4</sup> <https://www.finance.gov.au/blog/2016/09/09/Accessibility-ICT-Procurement-Standard/>

ABF urges the Productivity Commission to include this new Australian Standard on ICT accessibility into any reforms of human services.

Thank you for the opportunity to respond to the Issues Paper. Please call Ms Jennifer Grimwade should you require any further information.

Yours sincerely

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