

Vision Australia submission

**Northern Territory Draft Disability Strategy**

Submission to: Office of Disability, officeofdisability.tfhc@nt.gov.au

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## Introduction

Vision Australia is pleased to provide comment on the Northern Territory’s Draft Disability Strategy. As the largest provider of services to people who are blind or have low vision throughout Australia, we provide a range of services to Territorians who are blind or have low vision. In the 2020-21 financial year we provided services to 72 clients in the Territory, spread across all age groups and clustered mainly in the Local Government Areas around Darwin, Palmerston and Alice Springs. The main services delivered to these clients were Occupational Therapy, Orthoptics, Telelink peer support groups, Physiotherapy, and support in the use of assistive technology.

Blindness and low vision are predominantly age-related disabilities due to such medical conditions as diabetic retinopathy, glaucoma and macular disease. As the population ages and lives longer, the number of people who are blind or have low vision is therefore also increasing. We estimate that by

2031 there will be more than 2,350 people who are blind or have low vision in the Northern Territory who could benefit from the services that Vision Australia provides, and who will also be impacted by the Territory’s Disability Strategy and other initiatives to promote the wellbeing of people with a disability and their inclusion in all aspects of community life.

While many of the challenges faced by Territorians with disability are similar to those faced by people with disability everywhere, the Territory’s location, size and remoteness add an extra dimension to these challenges. At the same time, we believe that the Territory is uniquely placed to develop and implement strategies for enhancing the lives of people with a disability, including people who are blind or have low vision.

In preparing our comments we have been greatly assisted by the clear, concise and comprehensive discussion paper that was produced to inform the consultation. We have chosen not to address the specific questions in the discussion paper, but instead to draw attention to a number of key issues that we believe are of particular and pressing relevance for people who are blind or have low vision.

## Impact of New and Emerging Technologies

Few areas of life have been unaffected by the rapid changes in technology that have occurred over the past 30 years, beginning with digital convergence in the mid-1990s. Where technological innovation has been guided by principles of access, inclusion and universal design, the resulting technologies have been of great benefit to people who are blind or have low vision. For example, access to the internet and the vast amount of news, entertainment, ecommerce and general information that the internet has made available has helped to give people who are blind or have low vision an unprecedented level of independence and inclusion.

However, there are also many examples of technologies that have been developed and deployed with little or no regard to the diverse needs of the community, including people who are blind or have low vision. For example, if websites and apps are not developed to comply with the World Wide Web Consortium’s Web Content Accessibility Guidelines, they will be difficult or impossible for many people with a disability to access. During the COVID pandemic we have seen numerous notorious examples of this, with the result that people who are blind or have low vision have often been unable to access the information or services they need to stay safe and informed. At the time of its release, the Commonwealth Government’s COVIDSafe app did not comply with accessibility guidelines and so was difficult for some people to use; similarly, the COVID Vaccine Eligibility Checker website was not fully accessible at the time of its release.

The widespread unregulated introduction of touchscreen interfaces continues to present significant barriers for people who are blind or have low vision. While companies such as Apple, Google and Samsung has conclusively demonstrated that touchscreens can be made accessible (for example, by incorporating accessibility features into their smartphones and related products), few other companies have considered accessibility when implementing touchscreen interfaces. As a result, many domestic appliances such as washing machines, coffee machines and even digital pianos have become difficult or impossible for people who are blind or have low vision to access, because the touchscreens on these appliances have not been designed to comply with accessibility guidelines or best practices.

One of the most significant barriers that people who are blind or have low vision encounter when seeking employment in the public service or private sector is the inaccessibility of much mainstream information and communications technology (ICT) that is used in workplaces. Screen-reading and screen magnification software, and other adaptive technology, makes it possible for people who are blind or have low vision to use computer apps and related technologies, but only if they have been designed to comply with accessibility guidelines. If an ICT product that is used in the workplace does not comply with accessibility guidelines a person who is blind or has low vision will not be able to use it, regardless of how proficient they are in using their adaptive technology, and even if they are qualified for the particular job.

In December 2016 Standards Australia released AS EN 301.549:2016, Accessibility requirements suitable for public procurement of ICT products and services. This Standard was developed in Europe to provide a consistent approach to the procurement by governments and other public entities of ICGT products that would be accessible to people with a disability. Since its release in Australia, this standard has been adopted or referenced by a number of jurisdictions, but there is currently no consistent application of the standard across Australia, and there are few if any sanctions for failure to comply with the standard in those jurisdictions where it has been adopted.

We believe that adoption of the ICT Procurement Standard, supported by a robust policy framework and sanctions for non-compliance, is essential if technological barriers to the employment of people who are blind or have low vision are to be removed. Research conducted in Australia, New Zealand and Canada in 2018 found that only 24% of people who are blind or have low vision are in full-time employment. The unemployment and under-employment rate for people who are blind or have low vision is thus several times higher even than for the rest of the disability sector. In recent years there has been a decline in the employment of people with a disability in the public service throughout Australia, and although there are no disaggregated figures available, our experience working with clients suggests that for people who are blind or have low vision this decline is at least partially attributable to the inaccessibility of ICT used in government workplaces. Remedying this situation requires a greater commitment to the adoption and implementation of accessibility, especially AS EN 301.549.

## Establishing Public Service Employment Targets

In our response to the Disability Royal Commission’s Issues Paper on employment, we commented that:

“Finding and maintaining a job is the most significant challenge facing Australians who are blind or have low vision. For decades, the blind and low vision community has experienced levels of unemployment and under-employment much higher than the average for people with a disability, and therefore many times higher than for the community in general.

“While some new job opportunities have been created by technological advances, many traditional jobs have been lost. At the same time, new barriers to employment have been created, and there has been a systemic failure to address existing ones.

“The shocking result is that being blind or having low vision in Australia in 2020 all too often entails a lifetime spent searching in vain for a job that offers meaningful and rewarding employment, leading inexorably to low expectations, profound discouragement, loss of self-esteem, and economic hardship.

“The solution to the unemployment and under-employment in the blind and low vision community will never be found by doing more of what has been done in the past, which has comprehensively and demonstrably failed. Nor is there a single “magic bullet” policy lever, training program or government intervention that will ensure equal employment opportunities for people who are blind or have low vision.

In our response we presented and analysed the key research into employment and the blind and low vision community, discussed the various barriers that people who are blind or have low vision often experience when seeking employment, and offered a range of strategies for addressing the chronic un- and under-employment in the blind and low vision community. We summarised these strategies as follows:

“… the only way to new pathways to meaningful employment for people who are blind or have low vision is to implement interconnected and coordinated strategies [that are] anchored in the family, developed in the school and tertiary education systems, embraced by employers, supported by governments, and embedded in society as a whole.”

We believe that all governments have a pivotal role to play in promoting these strategies. Governments have the administrative and regulatory apparatus as well as the resources to implement policies and programs that will not only increase employment opportunities in government itself but also provide strong leadership to the rest of the community. In the past few days there has been discussion at the Disability Royal Commission’s inquiry into employment about the need for employment targets for people with a disability to become part of the KPIs of company CEOs. We have supported such an approach for quite some time, and believe that significant but achievable targets must be established for the employment of people with a disability (including people who are blind or have low vision) in the public service. Accordingly, we strongly recommend that the NT Disability Strategy include such targets for the NT public service, supported by mechanisms to ensure that they are met. Given the decline that has occurred in public service employment of people with a disability across Australia, we suggest that a target of 5-7% be set, with incremental annual targets once that has been achieved.

## Disability Impact Assessments

While rigorous implementation of AS EN 301.549 is essential, it will not be sufficient to ensure that all technology that people who are blind or have low vision encounter in their daily lives will be accessible. For example, the technology used in lifts in new and refurbished buildings have changed in recent years, and touchscreen interfaces are now used both in lifts themselves and also in the systems that are used to call and direct the lifts (lift destination control systems). There is as yet no standards to ensure that these technological changes will be usable by people who are blind or have low vision. Some lift manufacturers have incorporated accessibility features into their lift infrastructure, but there is no consistency in how this is done as there is no recognised standard, and this leads to unpredictability for people who are blind or have low vision.

The development of standards often lags behind technological change, and this can have a disproportionate negative impact on people with a disability. The implementation of disability impact assessments is one mechanism that can help to mitigate the accessibility barriers caused by the gap between slowly-evolving standards and rapidly-changing technology.

## Being Safe in the Community

It goes without saying that all people with a disability have a fundamental right to be and feel safe when they are using community infrastructure and services or participating in community life. Over the past five years or so a number of changes in transport technology have had a direct impact on the actual and perceived safety of people who are blind or have low vision.

In 2018 Vision Australia commissioned research by Monash University’s Accident Research Centre into the impact of electric/hybrid vehicles and bicycles on the safety of pedestrians who are blind or have low vision. A key finding from this research was that 35% of people who are blind or have low vision have experienced a collision or near-collision with an electric/hybrid vehicle. Further, 75% indicated that the introduction of these vehicles has reduced their confidence to walk and cross roads, because they no longer feel safe.

Electric vehicles are near-silent, and so cannot be detected audibly, especially when travelling at low speeds. People who are blind or have low vision rely on audible cues such as traffic noise for orientation and determining when it is safe to cross a road. Without such cues, crossing a road can be dangerous, because it is easy to walk straight in front of a silent electric vehicle without knowing it is there, giving the driver no time to avoid a collision.

The US, Europe and the UK have all introduced standards that require all electric/hybrid vehicles to be fitted with Acoustic Vehicle Alert Systems (AVAS) so that they emit detectable levels of noise. This makes it possible for people who are blind or have low vision to detect these vehicles in much the same way that they detect traditional, petrol- and diesel-powered vehicles.

Vision Australia has met on several occasions with Federal MPs and also with senior staff in the Department of Infrastructure, Regional Development and Cities. We have received assurances that minimal noise levels achieved via AVAS will be required of all electric/hybrid vehicles entering the Australian market in the future. Most recently, we have been advised that a Regulatory Impact Statement for the inclusion of AVAS will be released, most likely before the end of 2021.

In the meantime, Australia continues to lag behind other countries in mitigating the real and significant safety impact of electric vehicles on people who are blind or have low vision. We strongly encourage the Northern Territory to use the Territory’s Disability Strategy to play a leadership role by requiring all electric vehicles (including electric buses) purchased or permitted to be used by the NT Government to include AVAS.

Another transport trend that is causing significant safety concerns for people who are blind or have low vision is the increasing prevalence of electric scooters (e-scooters), e-bikes and other rideable vehicles on pedestrian footpaths. Like electric cars and buses, these e-vehicles are near-silent, and can therefore be virtually impossible for a pedestrian who is blind or has low vision to detect, especially when there is ambient noise in the environment. Even when an e-scooter can be heard, their travelling speed is often excessive and provides no time for a pedestrian to avoid a collision.

Vision Australia recently surveyed people who are blind or have low vision across Australia about their experiences with e-scooters, e-bikes and other rideable vehicles on footpaths. Some of the findings from the survey are truly shocking: over 60% of respondents said that they have been involved in an accident or a near-accident with an e-scooter or other rideable; over 80% said that they now feel less safe when they go outside their houses to walk, and over 40% said that they use footpaths less often now than they used to before e-vehicles were introduced.

Using e-scooters and other rideables is proving to be a convenient and effective form of supplementary transport for many people, and they will undoubtedly have an increasing role to play in the development of “first and last mile” transport services. However, it is not acceptable that their use be allowed to compromise the safety of people with a disability, including people who are blind or have low vision. We strongly encourage the NT Government to ensure that the Disability Strategy demonstrates a firm commitment to pedestrian safety as existing transport modes evolve and new ones are introduced. Safety measures could include prioritising the development of new transport infrastructure that allows e-scooters and other rideables to use separate lanes or pathways, and, in situations where this is not possible and they must share footpaths with pedestrians, enforcing a maximum speed limit that is no greater than 10 km/h.

## Making Accessible Technology part of the Solution

So far in this submission we have highlighted some of the barriers that wanton and unregulated use of technology can cause for people who are blind or have low vision. It is also important to emphasise that new and emerging technology can be of great benefit when it is developed and implemented in compliance with accessibility standards, and supported by community infrastructure that is designed to be inclusive. Research conducted by Vision Australia and Curtin University in 2020 showed that over the past five years there has been a significant uptake of smartphones by people who are blind or have low vision, and that innovative smartphone apps designed in accordance with accessibility guidelines are providing people who are blind or have low vision with an unprecedented level of access to information. To continue our focus on transport, 41.5% of the 845 respondents to the survey that formed the core data-gathering tool of the research said that they used smartphone apps such as Maps and GPS to assist them navigate around the community, and 36.3 said that they used smartphone apps to check public transport information such as timetables.

With an increased use of smartphones it is essential that governments and the private sector ensure that mainstream apps are developed in accordance with accessibility guidelines. The same research mentioned above also found that 38.3% of respondents use smartphone apps to book taxis and ridesharing services. Some services are only available through a smartphone app. Our research also found that, in general, many mainstream apps are still not fully usable by people who are blind or have low vision, and this causes frustration and significant accessibility barriers.

We believe that governments must be much more proactive in ensuring not only that their own smartphone apps are fully accessible, but also that public-facing apps developed by the private sector are also required to comply with accessibility guidelines.

Access technology is evolving just as rapidly as technology generally, and it is important for governments to engage in regular consultation with the disability sector to ensure that they are aware of current technological developments and to explore ways in which technology can address accessibility barriers.

## Maintaining Meaningful Connections

The COVID-19 pandemic has highlighted the vital role that social connections can play in reducing people’s feelings of isolation and contributing positively to their mental and emotional well-being. For people who are blind or have low vision, the ability to develop and maintain meaningful connections with family, friends, other people who are blind or have low vision, as well as service providers and other professionals, is critical at any time, not only during periods of crisis or national emergency.

Having reliable and affordable access to the technology for maintaining connections can also be important in providing people who are blind or have low vision with the services they need. Although age-related vision loss is increasing, blindness and low vision are still classified as “low incidence” disabilities, and providers of high-quality services to people who are blind or have low vision, including those who are NDIS participants, may not be readily available, particularly in rural or remote areas. Although face-to-face services are usually preferable and sometimes essential, Vision Australia and other service providers have been able to leverage technology such as videoconferencing and small, portable cameras to deliver a range of remote services.

With its unique characteristics of size, small population and remote communities, the Territory’s disability community is at increased risk of becoming isolated and under-serviced without the deployment of technologies that facilitate connecting with others.

We therefore believe that it will be important for the Territory’s Disability Strategy to include measures for ensuring that all Territorians who are blind or have low vision are able to access digital infrastructure such as the internet, and the associated technologies needed to maintain social connections and receive remote services.

## Conclusion and Recommendations

Based on our comments in this submission, we make the following recommendations:

1. That the Northern Territory Government adopt the Australian Standard for Accessible ICT Procurement (AS EN 301.549) for all purchases by government departments and agencies, and ensure that a robust policy framework is developed to support the implementation of this standard, including appropriate sanctions for non-compliance.
2. That the Northern Territory Government, in consultation with the disability sector, develop targets for the employment of people with a disability in the NT public service, beginning with a target of 5-7% to be achieved during the life of the current Disability Strategy, and increasing by annual increments thereafter.
3. That the Northern Territory Government implement a system of disability impact assessments to ensure that any new or proposed technologies introduced in the Territory comply with accessibility standards, guidelines and best practices.
4. That the Northern Territory take all measures necessary to ensure the safety of people with a disability, including people who are blind or have low vision, when developing transport infrastructure or introducing new transport modes.
5. That the Disability Strategy include a mechanism for regular consultation with the blindness sector on how the latest developments in technology can be used to address accessibility barriers.
6. That the Northern Territory Government ensure that people who are blind or have low vision have affordable and effective access to technology that will allow them to share information, engage in peer support activities, and in general, maintain connections with their peers in the Territory and across Australia.

We Congratulate the Northern Territory Government on the work it has done so far, and we look forward to the final version of the Territory’s Disability Strategy. We would be very happy to provide the Oversight Group with any additional information that may assist it.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind 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 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 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 Library for 0-7 year olds;
* Employment services;
* Production of alternate formats;
* Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
* NSW Spectacles Program; and
* Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their 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 26,000 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 as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are 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.