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**Vision Australia Submission to Review of Technology Assisted Voting**

Submission to: NSW Electoral Commission

Submitted To: tav.review@elections.nsw.gov.au

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# Introduction

Vision Australia is providing this submission to the NSW Electoral Commission’s review of technology assisted voting to assert our strong view that people with disability have a fundamental and non-negotiable right to an independent, secret and verifiable vote at all state and local government elections in NSW. For many people with a disability, especially people who are blind or have low vision, this right can only be fully upheld through the use of technology assisted voting. The iVote platform, with its trio of voting options, did uphold this basic right for almost all people with a disability for a decade. The decision to remove iVote, irrespective of the merits or inevitability of that decision, was therefore a decision whose effect has been to diminish the right of electors with disability to participate on the same basis as the rest of the community. It is the only example that we are aware of in contemporary Australia where the inclusion of people with disability has been reversed through a deliberate government decision. Conversely, this decision has increased systemic discrimination and the negative impact of exclusion from participation in a key aspect of civic life.

The equity and inclusion vacuum left by the disappearance of iVote is not consistent with Australia’s obligations under the UN Convention on the Rights of Persons with Disabilities, and it certainly does not reflect the goals of Australian disability policy generally. We regard the current review of technology assisted voting as an important and timely first step on the road to the restoration of voting rights for people with a disability in NSW, and we acknowledge the initiative and hard work of the NSW Electoral Commission in undertaking the review. Ultimately, of course, it will be the responsibility of the NSW Government to implement any consequential recommendations, and it will be held accountable if the right of people with a disability to have an independent, secret and verifiable vote continues to be unavailable.

We greatly appreciate the comprehensive Issues and Questions paper that the Commission produced to inform the review, although we do note that unfortunately there were a number of accessibility issues with both the PDF and Word versions of the paper that made it more difficult for users of assistive technology to interact with the paper. We will use selections from the questions presented in the paper to structure our submission, noting that our focus will be on those areas in which we believe we can add value because of our expertise in blindness and low vision.

The Issues and Questions paper defines technology assisted voting as any form of voting that is done by means of an electronic device, and this includes human-assisted telephone voting. This is a broad definition, and in our own discussions and advocacy we generally construe technology assisted voting as any form of voting that does not require a third party in order for a person to cast a vote. In other words, we do not regard human-assisted telephone voting as a form of technology assisted voting, even though both the user and human operator use a telephone, and there is technology involved in the registration phase of the service. We draw this distinction primarily because we do not regard human-assisted voting as meeting the basic criteria for equal participation by people who are blind or have low vision in the electoral process, including being able to cast an independent, secret and verifiable vote.

In the case of iVote, there were two components that constituted technology assisted voting from our perspective: voting using a telephone keypad, and voting using the internet. Voting terminals or kiosks are other examples of technology assisted voting, even though they usually require a human operator to provide basic training and familiarisation to the voter before they can use the terminal. However, and noting the Review’s broad definition of technology assisted voting, we will include some comments that refer to human-assisted voting options, especially when it is discussed as a component of a suite of voting options such as iVote. It is worth noting that the field of artificial intelligence is developing very rapidly, and it has been suggested that at some point in the foreseeable future it may be possible to replace or supplement a human operator with an AI voting bot, in which case this form of voting would certainly be considered to be technology assisted (as well as arguably being perceived as more independent, secret, and verifiable).

# Background

The greatest benefit of Technology Assisted voting for people who are blind or have low vision is that it can provide options for casting an independent, secret and verifiable vote that are otherwise unavailable. Other approaches to allowing people who are blind or have low vision to vote do not provide independence, secrecy or verifiability. This applies specifically to the human-assisted telephone option that has been offered during federal elections since 2010. This option also comprised one of the components of the iVote platform, and will be the only accessible option available to people who are blind or have low vision for the March 2023 NSW state election.

Following the 2022 federal election, Vision Australia conducted a survey of the voter experiences of people who are blind or have low vision. We have discussed the results of this survey at length in our submission to the inquiry into the 2022 Federal election conducted by the Joint Standing Committee on Electoral Matters, and we also included relevant results and analysis in our submission to the Select Committee Inquiry into the Conduct of NSW Elections. The survey focused specifically on the 2022 Federal election, but to the extent that the results relate to human-assisted telephone voting, they clearly demonstrate the inadequacy of any such service wherever it is implemented.

Of the 113 survey responses, 34% were from people who identified as having low vision, while the rest were from people who said they were either totally blind or “legally” blind (a category based on visual acuity that is used as an eligibility criterion for various State/Territory and Commonwealth benefits). Approximately 39% of respondents had been blind or had low vision since birth, while around 35% had been blind or had low vision for more than five years. Respondents ranged in age from 18-24 (4%) to 85 and older (10%), with 25% of respondents in the 55-64 age range. Almost 29% of respondents said that they live in rural or regional areas, while the rest live in metropolitan areas.

36% of respondents said that they experience additional disabilities, including (most commonly) hearing impairment, Parkinson’s Disease, peripheral neuropathy, mobility issues such as loss of balance, neurodivergence, and rheumatoid arthritis. The extent and range of additional disabilities provides clear evidence that the blind and low vision community is very diverse, and that people have unique needs that cannot always be met with a “one size fits all” approach. Having a range of options available in particular contexts will ensure that the maximum number of people will be able to benefit. Technology Assisted voting, as demonstrated with iVote, has the flexibility to accommodate this diversity and is therefore inherently superior to other approaches.

57% of respondents to our survey said that they used the Blind and Low Vision Telephone Voting Service (human-assisted telephone voting) to vote in the 2022 Federal election. Conversely, 43% of voters chose not to use it. We think it is significant that such a high percentage of voters chose not to use the service, especially given the challenges that still existed due to the community prevalence of COVID-19.

In our view, one of the constraints on the uptake of human-assisted telephone voting is that it is not secret, in the sense that in order to use it a voter has to disclose their voting preferences to another person. While there are separate registration and voter recording processes that minimise the risk of identifying individual voters, it is nonetheless easy to appreciate situations in which there is a higher risk. For example, if a person who is blind or has low vision is acquainted with call centre staff, or if they live close to the location of the call centre, or if they live in a rural or regional area where there are only a few voters who are blind or have low vision, then they may well have concerns about the secrecy of using the service. In fact, almost 25% of respondents to our survey indicated that they were not confident that their vote was secret.

Of course, this result does indicate that around 75% of service users were confident that their vote was secret. Nevertheless, we believe that if it were found that 25% of the general community were not confident in the secrecy of the voting process then there would be a public outcry and pressure on politicians and administrators to fix it. The tradition of the secret electoral ballot is very strong in Australia since its introduction in 1856, and one reason for the high satisfaction with iVote in NSW is that it did ensure a secret vote for people who chose to use either the automated telephone keypad or online voting option.

Almost 20% of respondents indicated that they were not confident that their voting preferences had been recorded and submitted correctly. This is hardly surprising, given the difficulty that voters can have keeping track of their preferences when they have to rely on someone on the phone to record them, and also because a voter has no way of verifying that their vote has been submitted. While we have identified some improvements that could be made that would potentially increase voter confidence, it remains the case that a user of the service cannot independently interrogate the system in the way that they can with Technology Assisted voting.

34% of respondents indicated that there were aspects of using the telephone voting service that they found challenging or inconvenient. One respondent said:

*“As a user of iVote in NSW I am accustomed to being able to vote below the line. To do this using the telephone voting service would have required hours of preparation and a considerable amount of time dictating my preferences to the call centre staff, with no assurance that my vote would be recorded and submitted correctly, not to mention the pressure I would have felt that I was taking up too much of their time when there were other people waiting. So, I felt compelled to vote above the line, which is not how I wanted to vote.”*

Another respondent noted:

*“The limitation of registration and voting to weekday business hours made this process more inconvenient to fit around work commitments. Registration, although necessary, was an extra step not required of sighted voters.”*

One respondent said that they used the telephone voting service “because it was the least inaccessible option”. Some respondents certainly referred to the benefits (including convenience) of the service compared with other options such as postal and in-person voting, but overall the results of our survey indicate very clearly that a human-assisted telephone option alone does not offer independence, secrecy or verifiability. This is in contrast to the other components of the iVote suite. The deficiencies of the service are inherent to this option and not the result of administrative, logistical or organisational shortcomings that can potentially be addressed.

It is important to emphasise, however, that we do not support the replacement of a human-assisted telephone service with technology assisted voting, including online voting. There will always be a need for practical voting options that accommodate the diversity of the blind and low vision community, including those people who are not comfortable interacting with an online platform and who will find it more convenient to use a human-assisted service, notwithstanding that they will sacrifice some secrecy and verifiability in so doing. Technology Assisted voting must always be regarded as an essential but not the only voting option available to people who are blind or have low vision. And it goes without saying that technology assisted voting should never be regarded as a replacement for in-person assistance provided at polling centres. Our survey found that 25% of respondents voted in person, either on election day or prior to the election. People who are blind or have low vision who choose to vote in person do so for exactly the same reasons as the rest of the community: to share the atmosphere of an important civic activity; to educate their children about the voting process; to exercise their democratic right; and to enjoy the tradition of a Democracy Sausage.

# Issues and Questions

In this section we provide comment on selected issues and questions presented in the Commission’s Issues and Questions paper. We will follow the numbering used in Part 2 of the paper.

## 1. Constitutional Context

We will leave a detailed discussion of the relevant legislative framework to those with specific expertise in this area. However, we do emphasise that all legislation, including that related to electoral matters, must be analysed and assessed with reference to Australia’s obligations under the UN Convention on the Rights of Persons with Disabilities, the overriding application of the Disability Discrimination Act 1992, the National Disability Strategy, and the NSW Government’s Disability Inclusion Act.

Australia aspires to be a more inclusive society than when the foundations of our electoral system were established, and concepts like fairness, franchise protection, “free and fair participation”, and integrity must be interpreted in contemporary terms and in the light of community expectations for full equity and participation by all, including people with a disability. It is simply not appropriate to maintain anachronistic or outdated legislative requirements and concepts that make it more difficult for people with a disability to participate in civic life.

The right to a secret ballot is deeply embedded in Australian culture since it was introduced in the 1850s and 1860s in various states and territories. In fact, “the Australian ballot” was adopted in other countries including the UK, Canada and the US. Yet we have continued to see the notion of the secret ballot diluted for people who are blind or have low vision. As iVote clearly showed, technology now exists that can enable the full enjoyment of the right to a secret ballot, and legislation must be updated to allow it.

Legislation must also be updated to decouple the voting process from the form of the print ballot paper. For people who are blind or have low vision, and people who have other print disabilities, the form of the print ballot paper is neither accessible or appropriate. The need to replicate the form of the print ballot paper when designing the internet voting component of iVote presented unnecessary accessibility challenges and difficulties, and even when human-assisted telephone voting is used, it can be very difficult to visualise or interpret the print ballot paper as a mental image, and operators may feel limited in how much explanation they can provide without contravening the strict requirements of the legislation.

Technology is developing rapidly, and there is no sign that the pace of technological change will decelerate in the foreseeable future. The evolution of legislation and standards is often ill-equipped to keep pace with technological or societal changes. Any changes that affect electoral processes must, as far as possible, be framed in technology-neutral terms and with an emphasis on the promotion and protection of rights.

In summary, our view is that if technology assisted voting is to be optimally and beneficially implemented, then all relevant legislation must be overhauled to bring it into line with contemporary frameworks for disability inclusion, equity and participation. We are completely confident that this can be achieved without in any way undermining the fundamental integrity of the electoral system.

## 2. Contemporary Industry Expectations and Standards

The iVote platform with its three voting options was introduced in 2011 primarily to uphold the right of people who are blind or have low vision to cast an independent, secret and verifiable vote. The growth in uptake by the blind and low vision community demonstrated that it met community expectations. Clients sometimes provided feedback to us about registration delays or system outages, but the underlying platform was met with universal acceptance and support. In all our systemic advocacy around electoral participation, we referred to iVote as the “gold standard” in accessible voting for people who are blind or have low vision.

The extent to which any form of technology assisted voting upholds basic rights and thereby enables participation and inclusion is a key factor that must be kept foremost in undertaking an analysis of costs and benefits. Expanding the eligibility criteria for a particular form of voting may lower the unit costs of implementing it, but the end result may be to reduce the benefits. This was unfortunately the case with iVote. From 2011 to 2021, the eligibility criteria were expanded far beyond the original scope, and the capability of the system to accommodate the increasing number of users was not maintained, resulting in eventual and costly failure. The removal of iVote has had the greatest negative impact on people who are blind or have low vision – the very group that iVote was introduced to benefit.

We support the intent of the Electoral Council of Australia and New Zealand’s eleven essential principles for an Australian internet voting service. We are disappointed that the principles contain a mixture of precise and vague language, mirrored in the use of “shall” and “should”, and that they incorporate weak phrases such as “as far as practical” rather than the more proactive “to the maximum extent possible” which is more consistent with the language in the Disability Discrimination Act 1992. We are encouraged that the principles use “shall” in reference to the maintenance of vote secrecy. Even without amendments envisioned by the above comments, our view is that the human-assisted telephone service that has for the time being replaced does not comply with these principles.

Our strong preference is for the eleven principles to be amended. Once that is done, we would support their application to any form of technology assisted voting.

It goes without saying that any form of technology assisted voting must comply with current cyber-security standards. However, security should never be used as a pretext for violating fundamental human rights such as the right to an independent, secret and verifiable vote. Debates about cyber-security are unhelpful when they seek to elevate security above rights and exclude any consideration of how the diminution of equity, independence and participation affects real people in the real world.

Technical accessibility standards such as the Web Content Accessibility Guidelines and the Australian standards for accessible public ICT procurement (AS/EN301:549) comprise national and international benchmarks for accessibility, and any form of technology assisted voting must, as a minimum, comply with them, and have the inbuilt flexibility to respond to developments in these standards.

## 3. Needs of Electors who are Blind or Have Low Vision

As we have noted recurrently above, people who are blind or have low vision have a right to an independent, secret and verifiable vote. “Independent” in this context means that people should not have to rely on a human operator in order to cast a vote; “secret” means that a person should not have to disclose their voting preferences to any other person, even if that person is not known to them; “verifiable” means that a person should be able to confirm that their vote has been recorded and submitted correctly, and should not have to trust the assurance of an unknown and ultimately unaccountable human operator that this has been done. It should be obvious that human-assisted telephone voting does not meet these requirements, even though it does offer a level of amenity and convenience that many people appreciate and that should certainly be maintained. Only options such as internet voting and the use of an automated telephone keypad have the potential to meet them fully.

In our view, there is no single voting option that will meet the diverse needs of the blind and low vision community. For example, internet voting is not feasible for people who do not have assistive technology or who are not comfortable navigating relatively complex webpages; people who have significant hearing impairment may not be able to use automated telephone voting (or human-assisted telephone voting either, for that matter). The three options that comprised the iVote platform did meet the voting needs of almost all people who are blind or have low vision, and any form of technology assisted voting that is introduced in the future must also, as a minimum, include a similar suite of options.

In relation to accessible voting kiosks located at selected polling centres, we have never received much positive feedback whenever they have been used. Regardless of the specific access approach (headphones, speech output, buttons, etc.) they introduce a number of other factors additional to accessibility requirements. The polling centres where the kiosks are located might be difficult to access by public transport or taxi, either before or (especially) on election day; it may be difficult to navigate independently from a taxi drop-off point to the place where the kiosks are located; people with additional mobility impairment may not be able to travel to them anyway; the use of the kiosks will require familiarisation provided by election staff, and people who are not comfortable using new technology may find this extremely challenging. The negative impact of these factors significantly outweighs any benefits these voting kiosks offer to the blind and low vision community in general. It is important to note, however, that some people have used centrally-located accessible voting kiosks when they have been provided, and we certainly do not suggest that they be completely excluded from the range of technology assisted voting options. However, they must never be offered as the sole or primary method of technology assisted voting.

The Issues and Questions paper invites comments on the use of braille ballot papers. These have only ever been available for local government elections administered by the Commission, which has resulted in some confusion and uncertainty. Our impression is that people who use braille ballot papers do expect them to be available for state elections and are frustrated and disappointed when they are not. Braille remains a primary literacy medium for people who are blind, and may be the only effective communication medium for some people who are deafblind. However, the unique requirements of electoral ballot papers do create logistical issues for the production and convenient use of braille ballot papers, and so far, these issues have been insurmountable in state elections. Our view is that the issue warrants further investigation, but they will never reduce the need for other voting options.

In relation to registration for the use of technology assisted voting, we would only very reluctantly agree to any suggestion that registration not be available on election day. Some respondents to our survey of voter experiences in the 2022 Federal election said that they only found out about the availability of the Blind and Low Vision Telephone Voting Service on election day itself, while others noted the difficulty of taking time out from their job to register during business hours. It would not be an acceptable outcome if a person who is blind or has low vision were to be denied the opportunity to vote because they became aware of their options only after the registration period had closed and while the rest of the community was still able to vote. Nevertheless, most people probably registered prior to election day, especially if they had experienced delays in the past. A shorter pre-registration period will obviously place a greater demand on the staff and systems involved, as well as being less forgiving of technical or other delays, for example, in providing voter application numbers by text or email. It must be borne in mind that pre-registration is a step that the rest of the community does not have to undertake in order to vote, and the Commission therefore has a responsibility to ensure that it is implemented with the maximum degree of amenity and convenience for voters who are blind or have low vision. In particular, the blind and low vision community has an understandable expectation that any reduction of the pre-registration period would be offset by clear and tangible benefits in other areas of the voting process.

The Issues and Questions paper invites comments on whether it would be appropriate for the Commissioner to verify the eligibility of persons who claim that they fall within a particular technology assisted voting elector class. We regard any attempt to verify whether a person is blind or has low vision as logistically impossible and philosophically unconscionable. There is no national or state-based registry of people who are blind or have low vision, and no organisation operating in the blindness and low vision sector, including Vision Australia, has contact with even the majority of people who are blind or have low vision. For example, we estimate that there are approximately 120,000 people in NSW who are blind or have low vision. Vision Australia’s client database includes details for less than 30% of that number, because many people who are blind or have low vision do not seek specific services from us. Other organisations will have different and partially overlapping client or member databases, but no database will include everyone who is blind or has low vision. Any attempt to use such databases to verify the eligibility of a voter who claims to be blind or have low vision would fail in a substantial number of cases. Other potential avenues for verification such as the NDIS would also fail, because they only have contact with a small percentage of people who are blind or have low vision.

We imagine that similar comments apply to organisations providing services to or representing other disability groups. More fundamentally, however, we do not believe there is the slightest justification for seeking external verification of a person’s claim to be blind or have low vision, or to have another disability that would make them eligible to use technology assisted voting. Vision Australia and other organisations are not gatekeepers or arbiters of the right to civic participation. Moreover, we are not aware of any evidence that, in general, people claim to have a disability when they don’t. In any case, any technology assisted voting option that could not readily accommodate a small increase in usage due to wilful misidentification would probably be insufficiently robust and fault-tolerant to be able to provide a consistent and reliable voter experience for legitimate user.

In commenting on the Issues paper’s question about when to involve people with a disability in the design of technology assisted voting, we draw the Commission’s attention to the National Disability Strategy, which is founded on principles of co-design at all levels of service and program development, delivery and evaluation. There is no stage where it is not appropriate to engage in consultation with the disability sector. It is essential that all consultation is meaningful and relevant, and not undertaken as a “ticking the box” exercise that wastes everyone’s time and achieves nothing.

## 4. Circumstances and requirements for electors located overseas

As noted previously, the removal of iVote has had a disproportionately negative impact on people who are blind or have low vision, and people with other disabilities for whom iVote was their only feasible and effective voting option. Any replacement technology assisted voting options must first and foremost address the needs and rights of the disability community. This includes people with a disability who live in regional or remote areas for whom other options such as postal voting is not feasible or convenient. We have no objection to any form of technology assisted voting being made available to other groups of electors, provided always that there is no potential or actual impact of any kind, including increased risk of data breaches and system delays, outages or failures, on voters with a disability. We have no particular view on whether or how elector verification is attempted, provided, again, that it has no impact on voters with a disability.

## 5. Risks and benefits of technology assisted voting to the integrity of the New South Wales electoral system

We note the list of eligible elector classes provided in section 152 of the Electoral Act. Our primary focus is the class of electors with a disability in general, and people who are blind or have low vision in particular. The right of this class to cast an independent, secret and verifiable vote, and thus to participate more fully and equitably in civic life, is most effectively upheld through technology assisted voting, and, conversely, is most easily violated by any risk to the successful implementation or operation of technology assisted voting. Mindful of the violation of rights caused by the premature and under-resourced expansion of iVote beyond its original scope, we believe that any future iteration of technology assisted voting must begin with a primary focus on voters with a disability, and only when it has been clearly established that the system is robust, secure and appropriately resourced should it be expanded to include other classes of electors.

## 6. Feasibility of making technology assisted voting available through personal networked devices at the 2027 State election and subsequent state and local government elections

From our perspective, the most important, non-negotiable criteria that a future form of technology assisted voting must meet are that it provides people with a disability, including people who are blind or have low vision, with several ways of casting an independent, secret and verifiable vote. In other words, any future technology assisted voting must, as a minimum, be equivalent to the suite of options provided by iVote. If such a system is not available or sufficiently tested in time for the 2027 NSW state election, then it should be deferred. In the meantime, a process of continuous improvement must be applied to existing voting methods, including the human-assisted telephone voting option. We are encouraged by the work that the NSW Electoral Commission is currently undertaking through testing and feedback to fine-tune this option in preparation for the 2023 March election.

## 7. Suitability of current legislation

We recognise that any form of technology assisted voting – and, indeed, any form of voting at all – risks unanticipated failure. We also accept that a technical failure should not inevitably invalidate the results of an entire election. Nevertheless, we believe that it is egregious to enact a “savings provision” as was done prior to both the 2022 Federal election and the upcoming NSW March 2023 election that has or may have the effect of disenfranchising people who are blind or have low vision without putting in place a legislated obligation to put a failsafe mechanism in place. If there is a system failure, including a failure of human-assisted telephone voting, then voters who are blind or have low vision and anticipated voting via the system prior to its failure must be provided with another, predetermined and optional, way of voting that is not unduly burdensome or inconvenient, even if it is suboptimal in terms of independence, secrecy or verifiability, and even if it is inferior to the failed system. Naturally, any alternative voting method must be developed through consultation with the blindness and low vision sector, promoted widely prior to an election, and able to be deployed immediately in the event of a system failure.

Obviously, a primary goal of any form of (technology assisted) voting is to minimise the risk of catastrophic failure. We do not support the use of legislated caps or proportions of electors who can use a particular system because they are likely to become out-of-date quickly as systems evolve, but we do believe that it is essential for voting systems to be adequately resourced by government so that they can continue to be developed and maintained. We would support and welcome the inclusion of resourcing requirements in legislation.

## 8. Technology-related developments in electoral administrations in similar jurisdictions

Vision Australia, along with other organisations in the blindness and low vision sector, has always regarded the suite of voting options that comprised iVote as the “gold standard” in independent, secret and verifiable voting for people who are blind or have low vision. We have promoted iVote widely and often to other jurisdictions throughout Australia, and we have not observed any voting options that come close to iVote’s offerings, not only in terms of independence, secrecy and verifiability, but also in terms of amenity and convenience for voters. We have commented previously about the significant limitations of centrally-located voting kiosks that outweigh any benefits in terms of voting integrity and security, and we do not recommend their adoption as a substitute for more suitable methods of technology assisted voting. We have also recommended the further investigation of braille ballot papers in state elections, including their implications for the election integrity framework more generally.

## 9. Mechanisms for national coordination of technology assisted voting policies and systems

People who are blind or have low vision often express their frustration and disappointment to us about their voter experiences in those jurisdictions and elections where iVote was not used. Our strong view is that after identifying the method(s) of technology assisted voting that most fully uphold the right to an independent, secret and verifiable vote, all electoral commissions in Australia should move towards its adoption. While this might take time and require coordinated legislative reform, it is in the long-run highly undesirable that voters who are blind or have low vision in one jurisdiction should have an inferior voting experience to those in another. The continuation of different and incompatible approaches to providing accessible voting options is not in the best interests of voters, and it does not allow the sharing of knowledge and learnings between jurisdictions.

Electoral Commissions in most states and territories, as well as the Australian
Electoral Commission, maintain some kind of disability reference group or advisory committee. These committees include representatives from the disability sector and meet regularly to discuss election-related issues that are of particular relevance for the disability sector. In the case of the AEC’s Disability Advisory Committee, representatives from state/territory electoral commissions also attend meetings, as well as a representative from the New Zealand Electoral Commission. We believe that an extension of this existing national framework is probably the most appropriate and cost-effective way of planning for the adoption of a national approach to providing technology assisted voting, at least in the initial stages. Another, not necessarily mutually exclusive, option would be to task the Electoral Council of Australia and New Zealand with developing such an approach. The Council would, in this case, need to expand its consultative mechanism to engage more systematically with the disability sector than it does at present. We envisage that each electoral commission would be responsible for contributing proportionally towards the funding for the project to develop a national approach for the provision of technology assisted voting, but it would be important to ensure that progress as a whole could be made if there were funding issues still to be resolved.

# Conclusion

This review into technology assisted voting is important and timely, especially given the negative impact on NSW voters with a disability of the removal of iVote. It provides an opportunity to develop a robust, secure, and stable solution that will be immune from failure as far as possible, as well as having the capacity to respond to technological developments and evolving voter expectations. We look forward to participating in subsequent stages of the review, and we urge the NSW government to implement any recommendations that emerge, so that the fundamental right of people who are blind or have low vision, and people with other disabilities, to have an independent, secret and verifiable vote is upheld in the present and protected into the future.

# 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.