

Vision Australia submission

Victorian State Disability Plan 2021-2025 consultation

Submission to: Department of Health and Human Services

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

# Introduction

Vision Australia welcomes the opportunity to provide a short submission to the Victorian State Disability Plan 2021-2025 consultation.

Vision Australia provides services to more than 26,000 people who are blind or have low vision every year. We work in partnership with Australians who are blind or have low vision to help them achieve the possibilities they choose in life.

We will be addressing topic 4 and topic 7 in this submission.

##### Topic 4 – Introducing overarching approaches to strengthen government commitments under the new plan

There are many barriers that people who are blind or low vision face when accessing government services, participating in education and gaining meaningful employment, however a key barrier is the inaccessibility of mainstream ICT products and services that are used across Government.

Innovation in mainstream technologies has rarely included accessibility in the absence of a legislative requirement to do so. Vision Australia has been lobbying for the introduction of a mandatory accessible ICT procurement regime across all Australian governments.

Strong and demonstrated commitment from governments and peak business groups to adopting a sound policy framework that incorporates elements such as, accessible ICT procurement, regular disability-specific training for procurement managers, and a greater number of targeted recruitment programs is essential.

In August 2016, the Commonwealth Government, in conjunction with Standards Australia, adopted European Standard EN 301 549, relevant to accessibility in ICT procurement (in Australia titled: ‘AS EN 301 549’) (**the ICT Standard**). The ICT Standard establishes minimum requirements to ensure that websites, software and digital devices are accessible, and provides a framework for the development and procurement of a wide range of accessible ICT products. The ICT Standard has potential to remove accessibility barriers for the employment of people who are blind or have low vision, but its effectiveness is dependent on it being universally and consistently applied at all levels of public procurement.

There has been inconsistent adoption of the standard across the states and territories. It is very disappointing there has not been a greater nationwide commitment to accessible ICT procurement because the inaccessibility of government systems, software and processes is one of the most significant barriers to the employment of people who are blind or have low vision in the public service and for them to be equitably included within the community.

Currently, in Victoria, whilst there are generalised references to the application of ‘standards’ in various procurement documents, there is no mandatory requirement for accessibility or for utilizing the ICT standard. The Digital Transformation and Strategy branch of the Victorian government develops policy, guidelines and frameworks relevant to the government IT systems. Despite there being a relatively recently developed Information Technology Strategy, nether system accessibility, nor accessible procurement are featured as a priority.

If Australia continues to demonstrate an inconsistent, lacklustre approach to the public sector procurement of accessible products and services, then we believe that there is a real and increasing risk that Australia will become a “dumping ground” for inaccessible products and services that cannot be sold elsewhere. This would obviously have a significant negative impact on people with a disability, especially people who are blind or have low vision, and would serve to perpetuate longstanding barriers to inclusion. .

The Victorian Government should also stipulate that any recruitment agency that tenders for government contracts must have already achieved DCR status, in much the same way that suppliers of ICT products and services must be required to comply with the Australian Standard for accessible ICT procurement.

##### Example of best practice – South Australia

South Australia can be looked to as an example of best practice in regards to accessible ICT procurement. The South Australian procurement model makes accessible ICT procurement mandatory, by including accessibility as a defined step in the procurement process. The South Australia procurement system makes accessibility a key and distinct step in the procurement framework, adopts the ICT Standard, and requires compliance with the ICT Standard from the earliest stage of the procurement process.

The requirement for accessible ICT procurement in South Australia is mandated by the ‘Online Accessibility Policy’ authorized by the Department for Premier and Cabinet on 16 May 2019 (**the Online Policy**). The Online Policy applies across all State government agencies. The overarching requirement for accessibility is governed by the *Disability Inclusion Act 2013* (**the DIA**).

The mandatory, whole-of-government policy requires that accessibility must be considered at all stages of procurement or development of digital products and services, from planning to development. It also places responsibility on vendors to “provide sufficient evidence to demonstrate their compliance with these requirements”[[1]](#footnote-1)

In October 2019, the South Australian Government (in partnership with Vision Australia and the Royal Society for the Blind SA) became a finalist in the Government Award category of the Australian Human Rights Awards.

In November the same year, the Online Accessibility Policy and Toolkit Team won the South Australian Department of Premier and Cabinet’s 2019 Employee Recognition Award, for its work in delivering outcomes through the Online Accessibility Policy, including the mandated approach to accessible ICT procurement.

The South Australian Government’s approach to driving accessible ICT procurement through the rigorous application of standards supported by clear and comprehensive resources makes it a world leader in the delivery of online accessibility, and it is a model that should be adopted in Victoria.

##### Topic 7 – responding to COVID-19

###### What are some of the most important issues arising from the Coronavirus (COVID-19) pandemic for people with disability that we should be thinking about in the next plan? (This can include things from the list above, or anything else you would like to add)

In 2020, Vision Australia conducted a survey to gain a deeper understanding of the issues faced by the blind and low vision community during the COVID 19 pandemic. We received 84 responses to the survey. We were pleased to receive this level of response given the many competing challenges and stresses people are currently dealing with. Both the quantity and quality of the responses painted a very clear picture of just how significantly the blind and low vision community has been affected by COVID-19. Further, at the beginning of 2021 we conducted another survey, focusing on barriers being experienced by the blind and low vision community while returning to a COVID normal way of life. This survey received 492 responses. Both surveys will be referenced below.

People who are blind or have low vision face unique challenges during emergency situations, such as COVID19. For example, we know people who are blind or have low vision are already at increased risk of experiencing loneliness and social isolation[[2]](#footnote-2), which has only been heighted by the COVID-19 pandemic. Our 2021 survey revealed 52 percent of respondents struggled, and are still struggling with feeling social isolated due to lockdowns and various restrictions.

###### Accessible information

A key issue experienced by people who are blind or have low vision during COVID-19 was the ability to access information. This is due to the conventional ways in which information is shared, which often is inaccessible. Unfortunately, we know this was no different during the COVID-19 pandemic. From our 2020 survey, we found the following in regards to the difficulties people who are blind or have low vision faced in accessing information during COVID-19.

* Over 26 percent of respondents said they couldn’t access information regarding travel, shopping and other restrictions.
* Over 20 percent of respondents said they couldn’t access information regarding the Federal and State Government’s response to COVID-19.
* Over 30 percent of respondents said they could not access information regarding how to get tested in the event of experiencing COVID-19 symptoms.
* Over 36 percent of respondents said they could not access information on how to access emergency services during COVID-19.
* Over half of respondents said they did not know about the Government’s dedicated COVID-19 hotline.

###### Access to essential supplies

Another significant issue experienced by the blind and low vision community during COVID-19 was accessing essential items at supermarkets and certain medical supplies. Online shopping, one of the main ways people who are blind or have low vision access groceries and other supplies, was briefly paused by the major supermarkets. There was no other way for blind and low vision people to get their groceries without going into the store.

Even though a dedicated shopping hour in the morning for the elderly and people with disability was established, this was of little help to people who are blind or have low vision as it proved near impossible to access a support person at 7am.

Due to social distancing requirements, staff at supermarkets were not always willing to assist blind and low vision shoppers to navigate around the store and locate the items they need. We had reports from clients who said they were not able to get the supplies they needed for over two weeks causing them extreme distress.

Concerns around the ability to easily access essential supplies continues to cause stress for our community with the ongoing potential of snap last minute lockdowns. Our 2021 survey revealed that over 50 percent of respondents are not confident that would be able to aces what they need if they were to be faced with a lockdown at short notice.

What is clear is that better forward and inclusive planning for the needs of people with disability during emergency situations needs to take place. From one of our clients:

*“It was scary and insulting to find that they didn’t do anything about planning for people with disability during the shutdown and only started planning for us as things started to reopen.”*

###### Access to testing

From both surveys, we also know the blind and low vision community has experienced difficulty in being able to access COVID testing, and have concerns about being able to access testing in the future should they need it. As highlighted above, our 2020 survey revealed over 30 percent of respondents said they could not access information regarding how to get tested in the event of experiencing COVID-19 symptoms.

People who are blind or have low vision are unable to drive themselves to testing centres and don’t want to burden or put at risk family or friends who live in separate residences.

*“For those of us who live alone, accessing testing without exposing friends or family was impossible.”*

In our 2021 survey we asked respondent if they have confidence that they would be able to arrange a COVID test if they needed it. 26 percent said they were somewhat confident, 14 percent said they were not so confident, and almost 10 percent said they were not confident at all.

We received positive feedback from our client base when the Victorian Government implemented a remote testing program that enabled people with a disability who could not reach a testing centre to be tested within their home.

What is clear from feedback we have heard directly from our clients is that the difficulties they experienced in not being able to access the bare essentials, or information regarding COVID-19, caused them extreme distress and anxiety and had a detrimental impact on their general wellbeing.

It is imperative that there is robust plans in place that address both accessibility of information and access to goods and services for people with disability in emergency situations.

###### What actions do you think government should be taking to address these issues?

Once we are in the midst of an emergency, it is simply too late to address and respond to the needs of people who have a disability. As put by one of our clients:

*“If we do not fundamentally re-configure the national conversation about the needs of people with disability, then the impact of the next emergency will be even more dehumanising then the present one.”*

During the initial period of the COVID-19 pandemic, people with disability, including the blind and low vision community, struggled to access their usual supports.

We heard from many clients who said they were unable to access support workers when restrictions were first put in place across the country. This presented a significant challenge for all people with disabilities, including those who are blind or have low vision, as they often rely on these supports to live the life they choose.

It is essential there are robust protocols in place to ensure appropriate supports and support workers are available when future emergencies occur, to ensure people who are blind or have low vision are able to access groceries, medications and other essential items.

###### What steps should we take to ensure we are better prepared for any future emergencies?

Emergency situations, such as COVID-19, often strike suddenly and without warning, forcing people to quickly leave or be confined to their home, or be cut off from necessary goods and support services unexpectedly.

For people with disabilities, this presents a very real and unique challenge.

As we have seen with COVID-19, the situation has become very serious in Australia, very quickly, highlighting gaps around emergency planning for people with disability.

From the outset of the pandemic, a voice for people with disability was missing. It was many weeks after initial restrictions were put in place that the unique needs of people with a disability were considered.

To avoid situations like this in the future and reduce the vulnerabilities and challenges of people with disabilities during emergency situations, it is crucial that these people, as well as the organisations that represent them, are involved in emergency planning from the outset. No one knows more about the needs of people with disabilities in emergency situations, than the people themselves. Any type of planning without their input would be planning for failure.

An inclusive approach to emergency preparedness must include members of the disability community in all aspects of emergency management. This needs to occur by way of a multi-pronged person-centred approach.

## 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 Feelix 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. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.

1. See https://www.accessibility.sa.gov.au/policy/online-accessibility-policy [↑](#footnote-ref-1)
2. Holloway, E., 2016. *Improving Depressive Symptoms In Adults With Vision Impairment: A Trial Of Evidence-Based ‘Problem-Solving Treatment' Integrated Within Low Vision Rehabilitation Services*. Ph.D. University of Melbourne. [↑](#footnote-ref-2)