

Ph 1800 033 660 | E [bca@bca.org.au](mailto:bca@bca.org.au) | W [bca.org.au](http://www.bca.org.au/) | ABN 90 006 985 226

# Promoting Inclusion Issues Paper: Technology

Despite its national reputation as an egalitarian society, for many years Australia has excluded many people from full enjoyment of the privileges of living here. Changing community attitudes and awareness of human rights have led to many attempts to change this aspect of Australian life over the past fifty years. The Disability Discrimination Act and the sequential National Disability Strategies, with their State and Territory counterparts, have demonstrated the nation's commitment to offering equal opportunities to people with disabilities. The National Disability Insurance Scheme provides one of the first mechanisms for collecting national data about people with disabilities and for learning about our needs, our goals and our progreess towards achieving them. No matter what efforts are made by individuals or what policies and programs are implemented by governments, Australia will not become an inclusive society until all aspects of the community consider and value equally the needs of all Australians, including those with disability.

Statistics cannot capture exclusion. They do consistently reflect the lower proportion of people with disability who participate in various aspects of society, including employment, higher education and home ownership. While many individuals who are blind or vision impaired first experience exclusion as a personal issue, their repeated exposure to it and their discovery, through meeting or discussing with their peers, that these experiences have been shared by so many others, eventually lead them to realise that the barriers we confront are systemic. Versions of these exclusions have been experienced by all members of the BCA Board, its volunteers and the majority of the staff, who are blind or vision impaired. These concerns are demonstrated in the numerous case studies of people BCA has supported with individual advocacy. Our quotes use our members' own words to describe their experiences.

This Disability Royal Commission is a unique opportunity to tell Australia what life is like for people with disability and to explain how this makes us vulnerable to violence, abuse, neglect and exploitation. We need to be included fully in society by having full access to public transport, education, employment, healthcare, citizenship and all activities of daily life. Blind Citizens Australia is pleased to respond to the Promoting Inclusion Issues Paper.

Blind Citizens Australia “BCA“ is the national representative organisation of Australians who are blind or vision impaired. Our mission is to inform, connect and empower Australians who are blind or vision impaired and the broader community. We provide peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers limiting the full and equal participation of people who are blind or vision impaired. Through our policy work, we provide advice to government and the community on issues of importance to people who are blind or vision impaired. As a consumer-based organisation, our work is directly informed by lived experience of blindness and vision impairment. Our members, our directors and a majority of our staff are blind or vision impaired.

## Question 3: Do You Think Australia Is an Inclusive Society? if not, why not?

BCA will be lodging other submissions in relation to some of the barriers which exclude people who are blind or vision impaired. This submission will focus on technology.

A significant and increasing barrier to the inclusion of Australians who are blind or vision impaired is the development and use of technology which does not take into account our needs. It was once hoped that the development of digital systems and processes which did not rely on paper and print would make it easier for people who are blind or vision impaired to particilate in the activities of daily life.

People who are blind or vision impaired can be and are competent users of many forms of technology. Their are many barriers which prevent them from benefiting from its potential. These include lack of access to equipment and training and lack of consideration of universal design principles which render technology inaccessible, irrespective of the user's skills or equipment.

### Inability to Use Technology

Not everyone can or wants to use technology to achieve day-to-day tasks and a society which does not respect this is not an inclusive one.

Increasingly, government departments, utilities and private businesses rely on the fact that they provide websites and apps to diminish the availability of human assistance or nondigital services. Many websites do not prominently list a contact phone number. To progress through a phone queue and reach an operator, it is often necessary to enter a series of numbers on a telephone keypad, which may be contained in printed information, usually in a small time window. To book an appointment with Centrelink, a restaurant, a hairdresser or a doctor, it will frequently be necessary to complete an online form. This trend is exemplified with the recent roll-out of COVID19 vaccinations, where would-be recipients have no option but to verify their eligibility, uploading the appropriate proof, source a centre and book a vaccination appointment online.

Many current seniors have been able to participate fully in their working or family lives without ever learning to use a computer. They may have been manual workers or labourers, professionals who still use paper files and have relied on administrative staff to maintain digital records or women who have been at home with their children and then volunteered in the community. at most, someone has shown them how to call or to send or receive texts on a mobile phone. These people are not comfortable or familiar with technology. The Federal government has acknowledged the barriers such reticence to use technology presents to the smooth operation of the economy by establishing the program “Be Connected: improving digital literacy for older Australians”.

According to Vision 2020 Australia, around 80% of vision loss in Australia is caused by conditions that become more common as people age. One in every four Australians is projected to be 65 years of age or older by the year 2056. This means there will be an increased number of Australians living with some degree of vision loss. For those who have not developped a familiarity with technology and who experience vision loss, they will need solutions which do not depend on technology so that they can continue living meaningful and productive lives.

It is likely that many people over 65, both now and in the future, will have acquired many skills in the use of technology throughout their lives and will continue to do so as they age. Whether or not a person has been adept at using technology in their life, with the onset of vision loss, many people experience a loss of confidence in their ability to use or gain skills. A competent computer user will need to find a new way of using it, someone to show them how and a belief that the reward will be worth the considerable effort. This may be at the same time that they are learning a new way to make a cup of tea, how to get about without driving and make difficult choices about their future.

There is often incredulity that a person who is blind or vision impaired could even use a computer or smartphone. A campaign was recently run in Britain to combat ignorance about the accessibility features of mobile phones. This was in response to reports in social media from people who were blind or vision impaired of being harrassed and having their blindness questioned, because they were seen to be using mobile phones in public. Education is needed to explain to people losing their sight that technology can help them keep in touch with friends, identify people, things and places, help them continue reading and much more.

Among both people who have been blind or vision impaired all their lives and those who have acquired vision loss, there is genuine trepidation about technology. They hear regular media stories about people who are scammed or catch viruses because they responded to links in fake emails, people whose Facebook accounts are hacked because they friended people who were not who they said they were and stories about people's identities being stolen because they disclosed personal information in insecure environments online. People who cannot see the screen, detect discrepancies in websites or letterheads or photos have a well-founded fear of being exploited if they start using the internet.

### Access to Technology

Australians who are blind or vision impaired have the same ability to buy computers, tablets and phones as anyone else. Some of these devices come equipped with features which make it possible to use them with voice output or magnification. These innovations are largely due to pressure exerted by the international blindness community. They demonstrate the value of applying inclusive design principles from the outset. Some training is available in the use of these features, either through online content, from selected retail stores or from blindness service providers. Professional training is unlikely to be available unless a person is a participant in the National Disability Insurance Scheme “NDIS", has identified it as a goal and has received appropriate funding.

For more complex tasks, such as those enabling work or study, many people who are blind or vision impaired prefer to use devices or software specifically designed for them, such as braille note-takers or displays or screen-reading or magnifying software, such as JAWS or Zoomtext. Such devices and software usually have high price tags as they are expensive to develop and sold in a limited market. They are sold in Australia by licensed dealers, so there is no opportunity for competitive pricing. Some of these dealers are blindness service providers, which also provide assessments of need and training, which may represent a conflict of interest when helping a person to decide what to buy. Extremely limited pre-sales testing is offered. Extensive training is not provided as part of the purchase and must be organised and paid for separately.

Funding for assistive technology and training can come from several sources including personal financial resources, Job Access, NDIS or My Aged Care. Eligibility is different for each source, with training, maintenance and replacement requiring separate funding streams. Access to such funding is strictly guarded and will not be provided if another source is available.

People who are blind or vision impaired and who are NDIS participants will not be able to use their funding to buy standard pieces of equipment, such as phones or laptops. These are considered to be items that any person might need to buy, although people with disability often require specific features and cannot simply buy the cheapest version of such products. More expensive items of assistive technology can be purchased through the NDIS if they are assessed as reasonable and necessary for the person to achieve their goals. Approval of such technology is inconsistent, beyond the point which can be explained by differing individual needs. It depends largely on the participant's understanding of and ability to express their needs and how technology could meet them. If you have never used the internet to pay bills, book a holiday or connect with friends, you may not be able to convince a planner of your need for expensive technology when you will not be using it for work or study.

The funding system is complex and full of gaps. For example, a student who is blind or vision impaired may convince their education department to buy them a laptop with appropriate software. This laptop will only be able to be used at school and will be the property of the education department. It will not be available for the student's use at home. Should they choose to go on to university or TAFE, they will then be required to seek new funding, most likely from the NDIS, which will be provided if it fits within their specified goals and is considered reasonable and necessary. Such assessments take time and the student will most likely have started their course before they receive their new device. They may still need to learn how to use it.

Many people who are blind or vision impaired have not chosen to enrol in NDIS, as they do not think it will make much difference to their lives. For them, the documentation, assessments and processes involved in enrolling outweigh any potential benefits. These people will have no assistance to purchase technology, unless they work and can obtain it through Job Access.

Job Access provides technology and training so that people with a disability can do their job. This scheme allows people to keep their technology when they leave their job, so that they can use it in their next position. The Job Access scheme needs to be expanded to assist people who are looking for work. Potential employers want to know how a person would do their job, since they have a disability. Without the appropriate technology and training, it is difficult for candidates with disabilities to answer these questions with certainty and confidence.

Any Australian who is blind or vision impaired and was unable to enrol in the NDIS before they turned 65, will have no means of accessing any funding support to purchase technology, unless they are eligible for it through My Aged Care. Access to assistive technology through this scheme is limited and poorly understood, including by most of the service providers who manage participants' funds. Assistive technology and training are not items which attract their own funding. Allocated funds can be spent on technology and training, but this will mean less money is available for support or home maintenance. Most aged care service providers have little knowledge about the technology that can help people who are blind or vision impaired or how to access training in its use. There should not be such disparity between the entitlements of NDIS and My Aged Care participants who need technology and training to meet their disability-related needs. What technology you need to live your life does not depend on what year you were born.

Helping people who have fallen between the cracks is the mission of Assistive Technology For All. It seeks the establishment of a national assistive technology program to meet the needs of people who are excluded from the NDIS. Appropriate assistive technology could not only increase the independence and community participation of older people, it could make them safer and less vulnerable to violence, abuse, neglect and exploitation.

People who are blind or vision impaired could choose to use their own resources to fund the acquisition of technology or training in its use. They may invest in an item, but may be unwilling or unable to update it when it becomes obselete. If they have never used a mobile phone or computer, they may not perceive its potential, may not believe they can learn to use it and would not be able to justify using limited funds to purchase it.

### Learning to use Technology

Receiving funding for training by appropriate, qualified trainers is unpredictable. Even where funding is available, blindness service providers often have long waiting-lists, operate in limited areas and have difficulty finding sufficient staff. Training has been mostly delivered to groups, to which people with evolving skills were required to travel. Ironically, if the participant already has sufficient knowledge of technology, this is one area where remote learning can be of great benefit, especially to people living in remote or regional areas. This method became more popular in 2020.

Training was once available free of charge to the learner from blindness service providers, as part of job-readiness or rehabilitation programs. Since the advent of the NDIS, costs have risen and are now prohibitive for the nonfunded learner. Even with funding, most people will receive a limited number of sessions, during which they may have to master many complex skills. Basic computer knowledge, email, searching the internet, file management, social media and shopping online each involve memorizing different sets of keystrokes and strategies. Only people used to learning will be able to acquire any but basic training in a small number of sessions. For some people, information will need to be repeated and practised several times and applied to tasks that are relevant to the learner before they can become reflexive.

"Training must be provided to the user in their assistive tech beyond the basics. I don't think there is any formal training that goes beyond the basics. The training should educate the person on how to help themselves to learn the technology and how to do research. The user must be empowered to self-educate due to the pace of technology. Just learning the basics or bare minimum of assistive technology and computers is no longer enough."

People who are blind or vision impaired have most often taught themselves how to use generic or specialist technology. They frequently reach out to their networks to give and receive instructions in how to achieve particular tasks using specific equipment or software. Whenever there is an update to IOS or Android software, there will be a flurry of emails and posts explaining the changes and detailing the many challenges for users who are blind or vision impaired which such updates pose all too often, even if unintentionally. Many people who are blind or vision impaired do not have a network of peers with whom to discuss their queries or frustrations. If there is a problem with their technology, the automatic impulse of themselves, their teachers or their employers will be to blame themselves and their own incompetence. Training materials are rarely provided in hardcopy formats, so that the learner requires a high level of competence before they can easily access training manuals etc. Many are unlikely to benefit from the full potential of the technologies available to them.

"There is a lack of training in the workplace. For example, when learning my job tasks someone who isn't blind is training me. If I'm learning a new system or process on a computer they say things like “double click the icon on the computer”, I can't see the icon, and I don't use a mouse I use screen-readers (NVDA and JAWS) that use key strokes. So, having training from someone who is blind or understands the use of screen-readers would be much more beneficial."

It is ideal that training is delivered by peers or external trainers who are blind or vision impaired. Most computer experts in the workplace or community and family and friends who offer to help will not have sufficient knowledge of accessible software.

Computer training courses should include modules on the potential of technology for people with disabilities and the importance of inclusive design principles. Fact sheets conveying basic information about the most commonly used programs should be made available and publicised to it professionals.

### Inaccessible Technology

There are many ways technology can fail to include people who are blind or vision impaired. Even with the right equipment and adequate training, many websites and apps remain inaccessible to people who are blind or vision impaired. Buttons which are not labelled, verification requiring capcha, rotating carasel cards, graphics and photos without image descriptions, videos without audio description, functions which can only be performed using a mouse, webpages where elements are not labelled--the list of difficulties which a person who is blind or vision impaired might encounter any time they launch their browser is seemingly endless. This would not be the case if web designers applied the latest version of Web Content Accessibility Guidelines, currently WCAG2.1. There are many excellent resources on how apps, websites and social media can be made accessible for all. Developers persist in ignoring these. This may be due to lack of awareness, but the possibility must be admitted that it is because they have negative attitudes which give rise to false assumptions about the capacities of people who are blind or vision impaired to use technology. Many developers do not seem to care that their actions are discriminatory.

It was once imagined that all devices would be able to talk to us and we would be able to speak to them to get them to do what we wanted. Smart speakers can turn on the lights or air-conditioning, manage our calendars and play word games with us. Everything from parking ticket machines to self-service supermarket check-ous has been equipped with the ability to speak. Perhaps due to lack of foresight, these capacities have not been extended sufficiently to enable them to assist in completing transactions. Washing machines can play the national anthems of three countries, but have not been programmed to describe the options available on their touchscreen! If product developpers could extend their imaginations, the world could be so much more accessible for people with disability. As the experience with voice-activated assistants and smart speakers as shown, such imaginative innovations can benefit everyone.

### Touchscreens

Touchscreen technology has revolutionised the way people get information. Touchscreens can be found everywhere: at banks, hospitals, lifts, restaurants, museums and information kiosks and on everything from mobile phones, dishwashers, microwaves, scales, gym equipment to musical instruments. People can make selections, execute options, order, review, pay and operate with their fingertips. If you are vision impaired, including if you are colour blind, depending on the lighting provided, you may perceive some glary or flickering icons, often not sufficiently distinguishable due to lack of space between them. If you are blind or have other types of vision impairments, you will detect only a flat piece of glass or plastic, with no ridges, buttons or distinguishing features. You will not know where to place your finger to trigger a selection and if you do randomly achieve an activation, you will have no clue as to what you have done. Even if you are able to memorize a list of functions, displays are often not static and menus are often cycled, so that they do not start or appear in the same order or place every time.

Perhaps the clearest example of touchscreen technology excluding Australians who are blind or vision impaired is provided by the banking sector. The Australian Payment Network Touchscreen Accessibility Guidelines, note, in their preamble, that various communities consulted reported that they preferred consistency of keypads across devices, physically distinct keys and a dot on the number 5 to help with orientation to the keypad. The dot on the numbg 5 is a useful feature mandated on all touchpad phones and is on most computer keyboards. The Commonwealth Bank of Australia "CBA", like other banks, decided to move away from pinpads and began to roll out to their merchants the Albert, an EFTPOS device featuring only a touchscreen. Although the Albert can be set to give audio output, this is difficult to activate and not well promoted to merchants. Customers are required to listen to a tutorial to learn how to use the machine. Unless customers have encountered it before, they are compelled to listen to this at the point of purchase, usually in a noisy environment and under pressure to complete their payment. The gestures required to select and enter digits on the Albert's touchscreen are very different from those used with traditional numberpads. As signatures are no longer a means of certifying a credit card transaction, users who are blind or vision impaired frequently have no way of entering their personal identification number “pin". In some cases, people have been obliged to disclose their Pin, either to their companion, if they had one, or to the merchant, who was a stranger to them. This is a breach of the obligations under which the card is distributed and could entitle the issuer to decline reimbursement if fraud occurred. It is also an unacceptable breach of privacy and deprives people who are blind or vision impaired of independence and dignity.

Although the Albert represents a strong of potentialntial discrimination under the Disability Discrimination Act “DDA”, no person who is blind or vision impaired has had the financial resources to challenge the CBA in the Federal Court and risk liability for the bank's costs in the event of dismissal. The CBA and other banks have continued to rely on touchscreen technology in their EFTPOS machines, without providing alternative methods of access, despite Australia's ageing population and the consequent increased prevalence of vision loss among customers.

It is possible to make touchscreens accessible for people who are blind or vision impaired, if inclusive design principles are followed from the outset. For example, voice-over is now embedded in all Apple products, so that, once enabled, almost all operations can be completed on the touchscreen. This is because of Apple's commitment to codesign, where products are developped in consultation with people with disabilities and other interested users.

If manufacturers and procurers think it is sufficiently important, touchscreens can give audio output to enable them to be used by a broad range of people, including those who are blind or vision impaired. They can also receive audio input. It needs to be obvious how to initiate the accessibility mode at the first point of contact. There must be a way for the user to verify the information they have entered and to let them know when a step has been registered. Audio and haptic feedback is preferable, so that the device can still be used amid background noise and is not inaccessible to people who are deafblind or have hearing impairments. Dots can help users to orient themselves to the device. No special training should be needed if sighted people can use the device without thinking about it. It is important that alternatives to touchscreens are provided, such as standards pinpads, so that access is not denied to people who are deafblind or who otherwise cannot use touchscreens.

### A Case Study in Not Promoting Inclusion: COVID19 Sign-In Protocols

Perhaps the clearest recent example of the technology needs of people who are blind or vision impaired being neglected is the roll-out of COVID19 sign-in measures, introduced for the purposes of creating a contact-tracing register. Whilst nobody could contest the public health benefits of this system, it has confirmed to many people who are blind or vision impaired many of the ways in which they are not included in Australian society. These issues need to be addressed, as it is probable that COVID-19 sign-in measures will be a long-term, standard requirement for all venues.

People who are blind or vision impaired have reported that finding the QR Code in a business is challenging, as they cannot see it, it is often obstructed, is located in different places in different businesses and it is often moved. Without visual cues to sign-in, not everyone knows or remembers to do so. Operating the QR code often requires third party assistance, generally by a staff member working at the business. Some staff members assert that this is not their role, some because they believe they are not allowed to do this. Whoever assists will violate COVID-19 social distancing protocols by touching the customer's hand or arm to guide their phone towards the QR code or by handling the phone to scan the QR code for the customer.

Someone may offer to register the customer on their behalf, either on their own device or with pen and paper, in jurisdictions where that is permitted. This will require the person who is blind or vision impaired to verbally divulge their contact information to the assisting person. Their privacy and confidentiality is violated. The customer has to disclose sensitive information to not only the assistant, but to anyone who can eavesdrop on the conversation, with or without the knowledge of the person providing the information.

Friends or family members may offer to help by signing in their companion who is blind or vision impaired on their own account. They will generally be required to describe them as 'dependents', which is not necessarily an accurate description and is demeaning to people who are being signed in by someone else because they find the sign-in process challenging due to inaccessibility or their lack of digital literacy.

The sign-in protocols assume that everyone has a mobile phone number that they are prepared to divulge. In the haste to encourage businesses to comply, there has been little focus on educating them about alternatives. Not all people who are blind or vision impaired own a smartphone. For many, a camera is not an important consideration and they may not have updated to the model of phone whose camera can read a QR code. If there is no alternative way to sign-in, people who do not use smartphones, do not have the digital literacy to use QR codes, cannot access the business and comply with the law.

Some people who are blind or vision impaired feel confident to scan the QR code using their phone's voice navigation system. It can be difficult to hear their own smartphone reading out fields which need to be completed and what they input, against loud music and conversation. This is particularly pertinent for people who are deafblind or have hearing impairments.

The COVID-19 sign- in apps provided by states and territories have varying degrees of accessibility. Some apps like the SAfe app created in South Australia have been easy to use with accessibility measures like Voice-over. Other apps have had difficulties smoothly integrating with voice navigation software and other accessibility settings like enlarged text. Further, finding information inside the app, e.g., a list of venues visited, has proved immensely challenging with screen-reader navigation. Positive features have included less steps needed for sign-in e.g., two taps, and an audible sound and/or haptic indicator that the sign-in has been correctly registered.

BCA calls for consistency in COVID-19 sign-in protocols in all states and territories. This will be increasingly important with more regular interstate travel. Coordination should be by the Disability Reform Minister’s meetings, or Ministerial Council. State and Territory Ministers overseeing disability portfolios should ensure that COVID-19 health directives from their respective health departments include information for venues about accessible and inclusive sign-in procedures for people with disabilities.

## 4. How Can an Inclusive Society Support the Independence and Choice and Control of People With Disability?

BCA asserts that australia would be a more inclusive society for people who are blind or vision impaired if the following recommendations were adopted:

1. Governments, utilities and private companies should remember that not all users can access their services using a computer. Alternative methods should be provided and publicised.
2. Education campaigns could inform the public, including people who are or will be experiencing vision loss in the future, about the potential of technology to help people who are blind or vision impaired to continue to achieve their goals. Such campaigns could explain how voice-navigation and magnification work. This would have the added benefit of informing teachers, health professionals and businesses about how they could better interact with people who are blind or vision impaired.
3. An e-safety campaign should be developed to teach people who are blind or vision impaired specific strategies to increase their safety and security online. These resources should be developed with the assistance of people who are blind or vision impaired and blindness service providers.
4. The Federal Government should establish a national assistive technology program, to meet the technology needs of people who are excluded from the NDIS. This scheme should include maintenance and training in the use of the technology provided.
5. The My Aged Care scheme should be modified to allow funds to be allocated for the purchase of assistive technology and training for participants' disability-related needs, without impacting the amount available for their other needs. There should be less disparity between NDIS and My Aged Care recipients' entitlement to technology and
6. Job Access should be expanded to people with disability who are registered as looking for work, so that they have the technology and training to be job-ready.
7. Blindness service providers and community groups which provide training in technology should offer low-cost training so that people who are blind or vision impaired can get the most out of their customized or generic technology. Community groups providing technology training should bear in mind the statistics relating to vision loss and ageing and develop their resources in the knowledge that many of their clients will be experiencing vision loss or will do so in the future and should not have to experience a consequent depletion of their technology skills.
8. Fact sheets conveying basic information about the programs most commonly used by people who are blind or vision impaired should be made available and publicised to it professionals.
9. Technology, including devices, software and apps, should be developed using inclusive design principles, with consultation with a broad range of user groups from the outset. This should include consultation with people who are blind or vision impaired or their representative organisations. Where technology is developed outside Australia, preference should be given to procuring technology which has been developed using inclusive design principles.
10. Websites should comply with the current version of Web Content Accessibility Guidelines. All products procured from overseas should also comply with these guidelines and this should be stipulated in all contracts put out to tender by governments.
11. Anti-discrimination cases need to result in significant consequences for companies which clearly breach the DDA. It is critical that appropriate penalties are issued, to dissuade companies from breaching the DDA.
12. BCA supports the strengthening of the DDA to ensure that people with disabilities are protected by a legislative requirement to remove systemic discrimination, in addition to specific cases that are brought before disability anti-discrimination commissions. Systemic discrimination should lead to significant penalties.
13. Taking into account the likely relative power and financial resources of a company rolling out technology when compared with an individual with disability who is lodging a complaint of discrimination, BCA urges that the onus be placed upon the company to demonstrate that discrimination has not occurred. The company should be required to show what they did to avoid discriminating, rather than placing the burden of proof upon the individual.
14. Any touchscreen in use in Australia should include features which make it accessible to people who are blind or vision impaired. Glare should be minimized, colours should be intense and icons should be clearly separated by empty spaces. Good lighting should be available. Voice output should be enabled, with initiation in a way that is obvious to a first-time user. There must be audio and haptic feedback to confirm when an action has been taken and a means of verifying what that action was. Alternative ways of inputting data, such as voice input or a keypad, should always be available.
15. Public education on public health directives relating to the COVID-19 pandemic should extend to accessible, inclusive sign-in protocols. This includes assisting patrons who are blind or vision impaired, providing information about sign-in protocols and ensuring all patrons can independently and accessibly comply with sign-in requirements. This must occur whilst observing social distancing guidelines to prevent viral transmission, by enabling the person to independently complete sign-in. Venues need to take into account how noise can impact the ability of a person using voice navigation to complete their sign-in.
16. The Ministerial Council should investigate multiple alternative procedures for registering attendance during the COVID19 pandemic. A one-size-fits-all approach will not ensure accessibility for all patrons.
17. All apps being developed or currently in use for COVID-19 sign-in should be tested for digital accessibility. A co-design approach should be adopted for new apps, with people who are blind or vision impaired consulted from the outset and throughout about features of the app which make it easy to use. For apps which are currently in use, users who are blind or vision impaired can provide feedback about accessibility and how to fix access issues. Any sign-in procedures that are adopted must preserve privacy and confidentiality. Methods where independent, confidential sign-in can be achieved are preferable.
18. Federal, State and Territory governments should fund, support, recognize and consult member-based organisations that represent and advocate for people with disability, including groups which represent people with specific