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# Position Statement on COVID-19 Sign-in Protocols

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## Blind Citizens Australia’s position

### Position summary

People who are blind or vision impaired have encountered issues with COVID-19 sign-in measures for the purposes of creating a register for contact tracing. Issues have included physical accessibility in locating and using a QR code, digital accessibility issues in apps introduced by different states and territories for sign-in, finding someone to assist them with sign-in, social / physical distancing violations when someone assists a person by physically directing their hand or arm towards a QR code, difficulties hearing the voice navigation prompts against background noise, and lack of alternative sign-in options. These issues are particularly pressing, because it is highly probable that COVID-19 sign-in measures will be a long-term, standard procedure for all venues.

BCA calls for consistency in COVID-19 sign-in protocols in all states and territories across Australia, with coordination for this approach initiated by the Disability Reform Minister’s meetings, otherwise known as the Ministerial Council. We advocate for multiple options being offered for sign-in, with major consideration for accessibility, and for social / physical distancing directives. These options could include an electronic card, a physical paper card with contact details, pre-registering the person using information provided with their booking, tactile markers around the QR code, and a secure phone number for signing-in. Finally, preservation of privacy and confidentially must be considered for all methods; methods where independent, confidential sign-in can be achieved are preferrable.

### About BCA

Blind Citizens Australia (BCA) is the national representative organisation of people 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.

### About people who are blind or vision impaired

There are currently more than 453,000 people who are blind or vision impaired in Australia with estimates that this will rise to 564,000 by 2030. According to Vision Initiative, around 80% of vision loss in Australia is caused by conditions that become more common as people age.

## Background

The Novel Coronavirus (COVID-19) has caused significant impacts on the way that Australians have lived their lives since March 2020. Public health directives issues at both federal and state levels have radically transformed our daily lives, with measures in place to reduce viral transmission in our communities.

An emerging issue amongst these health directives has been inconsistent state and territory practices for COVID-19 sign-in protocols at businesses for the purposes of creating for a register for contact tracing if a positive case is later identified to have been present at that locality. A common practice has been the use of QR Codes, although other forms of sign-in have also been used, including pen and paper sign-in.

A QR Code is a matrix barcode which is generally provided on paper attached to a physical location like a wall, door, counter, or table in businesses. A smart phone camera is used to scan the barcode, either by opening the camera app on a phone, or another sign-in app. Scanning the QR code requires the user to physically locate the QR code and to ensure the camera lens on the phone lines up with the QR Code. A banner or notification will appear to take you to a website if you are using the camera app, or if you are using an app with COVID-19 sign-in function, then it will either register you from previously provided details, or you will need to fill in a form on the phone with your contact information.

COVID-19 sign-in protocols have caused significant issues for people who are blind or vision impaired, in terms of physically locating the QR code provided by venues, correctly aiming the phone at the QR code, and the violation of privacy or confidentiality of sensitive information by having to disclose information to a third party if they need to complete the sign-in instead.

Additionally, the apps adopted for use in states and territories to support sign-in have had differing levels of digital accessibility. The current apps in use are:

* [Check in Qld](https://www.covid19.qld.gov.au/check-in-qld) (QLD)
* [Services NSW](https://www.service.nsw.gov.au/campaign/service-nsw-mobile-app) (NSW)
* [Check in CBR](https://www.covid19.act.gov.au/business-and-work/check-in-cbr) (ACT)
* [Service Victoria](https://service.vic.gov.au/check-in/) (VIC)
* [Check In Tas](https://www.health.tas.gov.au/covid19/check_in_tas) (TAS)
* [COVID SAfe check-in](https://www.covid-19.sa.gov.au/restrictions-and-responsibilities/covid-safe-check-in) (SA)
* [SafeWA](https://safewa.health.wa.gov.au/) (WA)
* [The Territory Check In](https://coronavirus.nt.gov.au/stay-safe/check-in-app) (NT)

State and territory governments are generally promoting an alternate sign-in method using paper and pen in the instance that someone is unable to use the QR Code to complete sign-in.

## Issues for people who are blind or vision impaired

1. People who are blind or vision impaired have reported that finding the QR Code in a business is challenging due to being unable to visually locate the QR code. Additionally, there is significant variation in where the QR code is place in a business, physical barriers including hand sanitizer or other obstacles, to gain access to the QR code, and QR codes are often shifted within the business to different locations between visits. People who are blind or vision impaired have a mental map of locations for navigating spaces, and the QR code being shifted means that this mental map generated during previous visits is unable to be used to find the QR code on subsequent visits. Further, a lack of being able to see visual cues to sign-in leads to not having an automatic cue that you need to complete the sign-in, often resulting in either not knowing, or forgetting to sign-in.
2. Operating the QR code often requires third party assistance, generally by a staff member working at the business. People who are blind or vision impaired have reported difficulties finding a staff member to assist them. Further, if they locate a staff member to assist or another member of the public, COVID-19 social distancing protocols have been violated to handle their hand or arm to guide their phone towards the QR code, or alternatively by taking the phone to scan the QR code themselves.
3. If an individual operates the QR code on their own using Voiceover, which is the inbuilt voice navigation software for iOS devices, or other voice navigation software, there is a practical difficulty of hearing their own smartphone device reading out fields against loud music and conversation, e.g., name, address etc. for the person to know what information needs to be put into the form. This is particularly pertinent for people who are deafblind.
4. In terms of privacy, an issue arises when someone assists people who are blind or vision impaired to complete the sign-in. Whether the sign-in is completed electronically or by pen and paper, it requires the person to verbally provide their contact information to the assisting person. This creates a situation whereby privacy and confidentiality is violated, both by having to disclose sensitive information to another person, and additionally to anyone who can eavesdrop on the conversation, without the knowledge of their presence by the person providing the information.
5. In some localities, alternate sign-in options like paper and pen sign in have been removed due to COVID-19 transmission concerns amongst patrons using the same pen for sign-in. Unfortunately, the ramifications for removing alternate sign-in mean that people who do not use smartphones, do not have the digital literacy to use QR codes, and people who are blind or vision impaired, including other disabilities, cannot access the QR code with ease, or at all.
6. 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 Voiceover. Other apps have had difficulties working in a smoothly integrated fashion with Voiceover or 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 screenreader navigation including Voiceover. 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.
7. The language used for signing in additional patrons is generally the term 'dependents' which does not accurately describe people who are being signed in by friends or family because they find the sign-in process challenging due to accessibility, or a lack of digital literacy.

## Policy solutions

To ensure the rights of people who are blind or vision impaired are effectively upheld in retail environments, Blind Citizens Australia is calling on:

1. The Disability Reform Minister’s meetings, or Ministerial Council, to lead a coordinated approach to COVID-19 sign-in protocols. It is important that consistency exists amongst states and territories for the approach to COVID-19 sign-in. This will become highly applicable with increasing travel interstate for domestic and business purposes.
2. Further, state and territory Ministers overseeing disability portfolios should contact relevant state and territory health authorities to ensure COVID-19 health directives include information to venues about accessible and inclusive sign-in measures for people with disabilities. State and territory governments, through health departments, are responsible for public education on public health directives relating to the COVID-19 pandemic, and this extends to accessible, inclusive sign-in protocols. This includes assisting patrons who are blind or vision impaired, providing information about sign-in protocols, and ensuring they can independently, and accessibly accessing the sign-in. Further, this requires not breaching social distancing guidelines to prevent viral transmission, by touching a patron's hand or arm to guide towards a QR Code, or taking a patron's smartphone to assist with sign-in, but rather enabling the person to independently complete sign-in. Finally, it means venues need to be cognisant that loud music and / or patrons' conversations can impede a user relying on voice navigation software to complete their sign-in.
3. Multiple approaches to COVID-19 sign-in protocols need to be offered and decided upon by the Ministerial Council. A one-size-fits-all approach will not ensure accessibility for all patrons at businesses. Possible solutions include:

a) A card similar to a credit card, or travel pass, which can be used in conjunction with a device which can digitally transfer information i.e., like a credit card being tapped near a paywave device, or a travel card like Myki being in close proximity to a validator for opening a gate etc. This card would only need to be in close proximity to any device, and could be used in a contactless fashion for sign-in. This approach would require federal oversight for a rollout at state and territory level, through the Ministerial Council.

b) A secure phone number provided for sign in where you can send a text message for sign-in validation. There will need to be tight protocols around privacy and confidentiality, including measures to ensure data storage is secure, and only for the purposes of contact tracing.

c) Tactile markers surrounding QR codes to assist people who are blind or vision impaired to find the QR code on a table or wall, however this will also require people who are blind or vision impaired to touch the space, which means regular sanitisation of the tactile indicators and surrounding areas would need to be a mandatory requirement for businesses.

d) A small card which provides forms to fill in contact information which can be handed over to staff or another patron to assist with either electronic or pen and paper sign-in. This approach acknowledges though that privacy is still violated in having a third party access sensitive information to assist with sign-in.

e) Using any pre-existing electronic or paper booking details for automatic sign-in upon arrival.

1. Any provisions to protect privacy must consider digital eavesdropping, e.g., preventing others seeing enlarged text displays on devices etc., and aural eavesdropping, e.g., other bystanders overhearing information, either provided verbally or by hearing the audio from screenreaders, especially where the person who is blind or vision impaired may not be aware of other people's presence.
2. Any apps being developed, or currently in use for COVID-19 sign-in need to have sufficiently tested digital accessibility. If an app is under development, a co-design approach whereby consultation occurs with people who are blind or vision impaired contribute from the outset about features of the app for ease of access, with user testing by people who are blind or vision impaired occurring throughout the development phases. For apps which are currently in use, user testing assists in providing feedback about accessibility and how to fix access issues.
3. COVID-19 sign-in apps should use alternate language for a person being signed in on the same device as another individual e.g., instead of 'dependent' perhaps 'additional person/s' etc.