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# Response to the Disability Royal Commission’s Final Report (Cth)

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## 1. Introduction

### 1.1 About Blind Citizens Australia

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities.

BCA provides peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers by promoting the full and equal participation in society of people who are blind or vision impaired. Through our policy work, we provide advice to community and governments on issues of importance to people who are blind or vision impaired. As a disability-led organisation, our work is directly informed by lived experience. All directors are full members of BCA and the majority of our volunteers and staff are blind or vision impaired. They are of diverse backgrounds and identities.

### 1.2 About people who are blind or vision impaired

There are currently more than 500,000 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 per cent of vision loss in Australia is caused by conditions that become more common as people age.[[1]](#endnote-2)

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. The extent to which people can actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive of the needs of all – including those who are blind or vision impaired.

## 2. Submission Context

BCA welcomes the opportunity to provide an initial response to the Final Report handed down by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (also known as the Disability Royal Commission or DRC).[[2]](#endnote-3)

The DRC Final Report was nearly five years in the making. It contains more than three million words and incorporates the personal experiences of nearly 10,000 people with disability.[[3]](#endnote-4)

The DRC Final Report documents the horrific violence, abuse, neglect and exploitation experienced, both historically and currently, by many of the 4.4 million Australians living with disability.

The 222 recommendations included in the DRC Final Report provide a pathway for Commonwealth, state and territory governments to end the mistreatment of people with disability.

This submission is based on the following legislative and policy frameworks:

* Disability Royal Commission – Final Report.
* Disability Royal Commission – Emergency Planning and Response Issues Paper.
* Bushfires Royal Commission – Final Report.
* Australia’s Disability Strategy 2021–2031.
* United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

BCA is hopeful that by working together, Australian governments, people with disability and the broader disability sector can translate the many words of the DRC Final Report into a blueprint for a safer and more inclusive society.

BCA’s submission is based on extensive consultations with our 3,000-strong member base and other people who are blind or vision impaired, and our ongoing advocacy work in the disability sector.

## 3. Blind Citizens Australia’s Submission

### 3.1 A key omission

#### Emergency planning and response

People with disability are more likely to experience poverty and a lack of social support. Around the world, governments and emergency services continually fail to meet the specific communication, transport and medical needs of people with disability as they prepare, evacuate and recover from natural disasters.

According to Australian researchers, the combined effect of these factors is that ‘people with physical disability are two to four times more likely than the general population to die or sustain injuries’ during natural disasters.[[4]](#endnote-5)

Regrettably, the Royal Commission into National Natural Disaster Arrangements, also known as the Bushfires Royal Commission, seldom mentioned the needs of people with disability in its final report published in October 2020.[[5]](#endnote-6) Indeed, a keyword search of the Bushfires Royal Commission website yielded no results for the words ‘blind’ or ‘vision impaired’.

This was particularly disappointing given the disability sector’s eagerness to improve natural disaster outcomes, as attested by the response to the DRC’s Emergency Planning and Response Issues Paper published in April 2020.[[6]](#endnote-7)

BCA has itself undertaken extensive policy work on emergency preparedness in recent months and was hopeful that the Bushfire Royal Commission’s oversight would be rectified in the DRC’s Final Report.[[7]](#endnote-8) There are, however, only passing references to emergency preparedness in DRC Recommendations 5.4 and 6.1.

Working with its state and territory counterparts, the Commonwealth government must do more to include people with disability during all stages of emergency planning and recovery. To achieve this, BCA endorses the proposal from the Disability Advocacy Network Australia to establish a Disability Disaster Management Centre (DDMC) within the National Emergency Management Agency.[[8]](#endnote-9)

The DDMC would consult with people with disability, disability representative organisations and service providers. It would advise Commonwealth, state and territory governments on how best to recognise, support and protect people with disability during emergency events (including future pandemics).

**Recommendations:**

1. Work with state and territory counterparts to better include people with disability when preparing for, experiencing and recovering from natural disasters.
2. Collaborate with state and territory counterparts to establish a Disability Disaster Management Centre within the National Emergency Management Agency.

### 3.2 The need for greater accessibility

#### Information and communications

Highlighting the inaccessibility of government websites, smartphone applications and documents is one of BCA’s most often repeated tasks. Screen reader users’ inability to access the recent final report of the Independent Review into the National Disability Insurance Scheme is just the most recent example.

DRC Recommendation 4.14 stipulates the Commonwealth government’s duty to provide information ‘in at least two formats accessible to people with disability.’ BCA recommends that Commonwealth entities go further than that and allow people with disability to choose from the following formats: audio, large print, e-text and braille.

To meet Recommendation 4.14, it is essential that all Commonwealth websites conform with the most recent version of the Web Content Accessibility Guidelines (WCAG), currently WCAG 2.1.

DRC Recommendation 6.1 calls on Commonwealth, state and territory governments to develop a ‘national plan to promote accessible information and communications.’ BCA would like this national plan to explicitly require free-to-air television broadcasters and streaming media services to provide audio description of their content.

**Recommendations:**

1. Provide people with disability the choice of audio, large print, e-text and braille formats when interacting with Commonwealth government entities.
2. Require all Commonwealth websites to conform with the most recent version of the Web Content Accessibility Guidelines (WCAG).
3. Include in the national plan for accessible information and communications an explicit requirement that free-to-air television broadcasters and streaming media services provide audio description of their content.

#### Employment procurement processes

People with disability are proven to be reliable, productive and loyal employees with much to contribute to the workforce.[[9]](#endnote-10) Employers benefit greatly when their recruitment processes allow people with disability to find a job.

Unfortunately, employers often fail to provide successful candidates with disability the hardware, software and other essential workplace tools needed to do their job. Regrettably, even the National Disability Insurance Agency’s internal systems have been inaccessible for staff members who are blind or vision impaired.

DRC Recommendation 7.23 calls on Commonwealth, state and territory governments to ‘adopt procurement policies that favour businesses and entities able to demonstrate, in accordance with published criteria, they are providing employment opportunities for people with disability in open, inclusive and accessible settings.’

BCA believes this recommendation underpins many others in the area of accessible employment. Allowing people with disability to gain meaningful employment and ensuring that they have access to the appropriate workplace tools will help Australia to become a more productive economy and inclusive society.

**Recommendation:**

1. Recognise that DRC Recommendation 7.23 is essential for implementing other recommendations in the area of accessible employment.

### 3.3 The phasing out of segregation

The DRC recommendations that have garnered the most media coverage can be found in Volume 7 – Inclusive Education, Employment and Housing. The DRC heard harrowing evidence of the violence, abuse, neglect and exploitation that occurs in segregated settings.

All the commissioners agreed that reforms were needed to ensure that no one is forced to participate in settings designed exclusively for people with disability. The commissioners were divided, however, when it came to the future of settings such as special schools, Australian Disability Enterprises (a type of employment that can legally pay people below the minimum wage), and group homes.

#### Education

BCA echoes the disability sector’s concerns that segregated schooling can be a source of pain and social exclusion for people with disability. BCA also acknowledges that people who are blind or vision impaired have benefitted from the learning and support of blindness-specific skills such as reading braille, orientation and mobility, and using assistive technology to access their education.

While this is provided in segregated settings, this support should be provided within mainstream education, if that is the preference of the student and their family. BCA recognises that trained specialist teachers play an essential role in fostering the inclusion of students who are blind or vision impaired in mainstream education.

**Recommendations:**

1. Work with state and territory counterparts to provide support and promote blindness-specific skills in mainstream education.
2. Recognise the vital role played by trained specialist teachers, and work with state and territory counterparts to ensure specialist teacher programs are well funded.

#### Employment

BCA echoes the disability sector’s concerns of the pain and social exclusion felt by people with disability when they are given no option but to seek supported/sheltered employment.

Like with education, BCA believes people with disability should have a choice in where they work and in what sort of work they do. BCA believes there should be a roadmap to transition away from Australian Disability Enterprises.

**Recommendation:**

1. Develop a roadmap to transition away from Australian Disability Enterprises.

## 4. Summary of Recommendations

As the government considers its response to the Disability Royal Commission Final Report, BCA makes the following recommendations to the Commonwealth:

1. Work with state and territory counterparts to better include people with disability when preparing for, experiencing and recovering from natural disasters.
2. Collaborate with state and territory counterparts to establish a Disability Disaster Management Centre within the National Emergency Management Agency.
3. Provide people with disability the choice of audio, large print, e-text and braille formats when interacting with Commonwealth government entities.
4. Require all Commonwealth websites to conform with the most recent version of the Web Content Accessibility Guidelines (WCAG).
5. Include in the national plan for accessible information and communications an explicit requirement that free-to-air television broadcasters and streaming media services provide audio description of their content.
6. Recognise that DRC Recommendation 7.23 is essential for implementing other recommendations in the area of accessible employment.
7. Work with state and territory counterparts to provide support and promote blindness-specific skills in mainstream education.
8. Recognise the vital role played by trained specialist teachers, and work with state and territory counterparts to ensure specialist teacher programs are well funded.
9. Develop a roadmap to transition away from Australian Disability Enterprises.
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