**Australian Disability Network submission – Digital Inclusion Strategy for NSW**

Australian Disability Network welcomes the opportunity to provide input into the NSW Government’s discussion paper outlining the proposed Digital Inclusion Strategy for NSW.

**Who we are**

Australian Disability Network (formerly Australian Network on Disability) is a national, membership-based organisation that helps organisations welcome and retain people with disability into all aspects of business.

We work with our 460 member organisations - who in combination employ around 2.2 million people or 18 per cent of Australia’s workforce - to remove barriers that limit opportunities and prevent the employment and career advancement of people with disability.

As the peak body for disability inclusion in the workplace, we provide expert guidance, services, and programs to employers, Government representatives, and industry bodies.

Through our Access & Inclusion Index we assess an organisations’ commitment to and processes to ensure:

* Web Content Accessibility Guidelines (WCAG) compliance
* commitment to accessible technology for employees and customers
* processes for consultation and user testing with people with disability
* feedback and review mechanisms to ensure continuous improvement to accessible technology and
* alignment with internal and external digital standards.

**Introduction**

Australian Disability Network agrees with the discussion paper’s premise that digital inclusion and connectivity are no longer a luxury but a fundamental necessity.

According to the United Nations Department of Economic and Social Affairs Disability and Development Report 2024, 98 per cent, of the top 1 million websites do not comply with international web content accessibility guidelines; and 63 per cent of national governmental online portals also do not comply.

The NSW Digital Inclusion Strategy discussion paper also highlights that 28.5 per cent of people with disability did not use the internet in 2018.

This lack of digital accessibility has a significant impact on the economic inclusion and financial independence of people with disability. The labour force participation rate in 2022 was 60.5 per cent for people with disability, compared to 84.9 per cent for people of the same age without disability.

People with disability have an equal right to access all employment opportunities however accessibility to technology and digital products is a substantial barrier to economic inclusion.

**Response to questions**

**Question 1. What does it mean for you to be digitally included?**

Society is more connected than ever, however digital technology that is not accessible to everyone increases the exclusion of people with disability. Being digitally included allows people with disability to have equal social, educational, and economic opportunities. Digital inclusion impacts our entire well-being - physical, emotional, and financial. Many people with disability also require digital services to access ongoing support, apply for and manage NDIS funding, and access assistive technology such as smart devices and screen readers.

*“Being digitally included allows me to live my life without unnecessary interruptions or additional barriers.”* Australian Disability Network employee with disability.

**Questions 2 and 3. What challenges do you face in accessing and using the internet, digital technologies, or online services? What specific aspects of digital inclusion are most important to you and your community?** **What challenges do you anticipate in the future?**

Whilst compliance with WCAG is included in government strategies, it is not mandated and references out-of-date WCAG standards. We still see websites that are inaccessible and have compliance with out-of-date WCAG standards.

Compliance with WCAG does not mean full accessibility for people with disability. Businesses should audit their websites, but also test them with people with disability to understand the usability of the website. This testing should be done regularly before each launch and update of digital technology. Additionally, each update should review compatibility with assistive technology to ensure continued use.

Where access to digital technology is regulated, for example, telecommunication companies, banks, and financial institutions, regulations (particularly relating to security) can supersede accessibility. For example, digital authentication processes are often identified as being inaccessible for people with disability including reCAPTCHA (images and audio), and shorter time frames to input codes (which is a particular barrier for people using screen readers).

We have heard from people with disability who have been asked to hand over their devices to strangers to gain access to accounts.

As one person with disability told us ‘‘*An unintended consequence of these barriers to access is that customers often rely on friends or family for help, and end up compromising their privacy and security, giving up their passwords and personal data to third parties*.”

**Recommendations:**

* Alternative to online help (e.g. human-based) options are needed. If an app, or website is inaccessible, people with disability are unable to gain access to the products and services unless they can speak with someone.
* Digital technology and services are often used for self-service. If the technology is not accessible, the self-service is not accessible. Self-service requires users to take a more active decision-making role, which people may not feel confident doing.
* Consideration needs to be made to the terms and conditions, costs, and sales, particularly for internet, and telephone services. Terms and conditions are often not in accessible formats as highlighted in consultations with Australian Disability Network. This includes a lack of accessible and inclusive language (e.g. legal terminology), and non-accessible formats – for example, no structures for screen readers meaning a screen reader user needs to read a whole document at once, unable to skip to information that is relevant or important to them. This means that people with disability may be signing up for internet/phone services without an informed understanding of terms and costs.
* One of the biggest barriers for customers is staff attitudes and a lack of support from customer service staff (this was identified in our work with the Australian Banking Association).
* Provide staff with ongoing regular training on how to:
* engage with people with disability. Staff support should be available via multiple communication methods to allow people with disability to connect with their preferred and accessible communication.
* digital teams need regular training on user accessibility and accessible methods. The training should be done in consultation with people with disability.
* people with disability need to be involved in solutions to educate against scams.
* Where accessibility barriers are identified these need to be resolved as soon as possible to prevent barriers for customers in accessing their accounts. We heard from one person with disability who was unable to access their bank account online for six months because the sign-in process on their bank’s website was inaccessible.
* People with disability are at a higher risk of scams. The Australian Competition and Consumer Commission (ACCC) reported that people with disability lost over $33 million to scams in 2022, with an increase in losses up 71% on the previous year. The most common scam contact methods were phone ($8 million) and internet ($7.8 million).
* Quick help when things go wrong – human-based as well as digital support.

*“I rely on my smartwatch to connect to my Smart Drive (motor at the back of my wheelchair) via Bluetooth. I often experience challenges with connectivity, as sometimes it won’t turn on when needed and there are times when it will turn on accidentally which can be a safety hazard.” Australian Disability Network* employee with disability

* Businesses need to map the whole user journey and touchpoints to identify how to embed accessibility (including the provision of human support, not just digital support)
* The public sector should be using their authorising power to encourage private and not-for-profit organisations to be adhering to WCAG and educating them on what they mean.

**Question 4. What do you think should be the top priorities for improving digital inclusion in NSW?**

Australian Disability Network supports many of the recommendations outlined in the United Nation’s Disability and Development Report 2024 *Accelerating the realization of the Sustainable Development Goals by, for, and with persons with disabilities* which include:

* Develop and strengthen implementation of ICT accessibility policies and regulations.
* Make disability inclusion a core feature of digital development investments and programs.
* Build capacity on ICT accessibility and universal design, including on ICT easy-to-understand formats.

* Involve persons with disabilities and their representative organisations in ICT development.
* Provide affordable Internet access for persons with disabilities.
* Promote digital skills training (in person, not online) for persons with disabilities

We also recommend Government departments introduce initiatives to raise the profile of digital accessibility including:

* Increasing awareness of the importance of digital accessibility
* Encouraging businesses, organisations, and institutions to improve the accessibility of their digital assets. The challenge is to explain that WCAG compliance is not a be-all and end-all solution and to avoid a tick-box approach.
* Improving access to resources to upskill people in digital accessibility, perhaps via funding to [Upskilled](https://www.upskilled.edu.au/).

**Question 5. How can we collaborate to make digital inclusion a reality for everyone in NSW? How can different parts of the community, such as local businesses, schools, and non-profits, collaborate to address these challenges?**

* Education campaigns. The first step for all parts of the community is to understand the importance of digital accessibility and the barriers people face to access information, products, and services in their everyday lives.
* Provide access to resources to upskill key people (digital professionals, managers, content creators, etc.)  within different parts of the community on digital accessibility and what that entails from a technical perspective. For example, schools could provide training to students on digital accessibility, local businesses could seek resources to train their staff and non-profits could set up programs and campaigns to advocate and spread awareness where relevant.

There needs to be a whole ecosystem approach to accessibility (individual, organisation, and systems) that involve cross-sector collaboration with the disability sector.

People with disability and peak organisations need to be involved to identify innovative solutions to digital accessibility (nothing about us without us).

Regulators also need to consider accessibility barriers in reforms.

**Question 6. What initiatives or partnerships would you like to see in place to support digital inclusion efforts?**

People with disability and peak bodies should be involved in the consultation and co-design of all initiatives to support digital inclusion strategies.

Governments should recommend that peak industry bodies develop and promote principles to guide industries on what best practices for accessibility look like, for example, The Australian Banking Association’s, [Accessibility and Inclusion Principles for Banking Services](https://www.ausbanking.org.au/wp-content/uploads/2023/12/WEB-10837-AIP-for-Banking-Services-2.pdf), developed with the Australian Disability Network.

We recommend that accessibility consultants from organisations like, for example, Intopia and, Vision Australia partner with schools, businesses, and other areas of the community to provide accessibility training to students and professionals. We encourage Governments to prioritize such initiatives through funding, offering free courses, and tightening requirements that Government agencies and statutory-owned corporations adhere to accessibility requirements.

**Question 7. How do you think new and advanced technologies can be used to make sure everyone in our community can easily use digital tools and be a part of the online world?**

The use of Artificial Intelligence is becoming more prevalent.  While it can increase accessibility for people with disability, the Australian Human Rights Commission has highlighted concerns about ethical use, including algorithmic bias in AI-informed decision-making, which is capable of reinforcing or exacerbating biases or prejudice.

We recommend:

* Accessibility is embedded into any national/state strategies focused on regulating the use of Artificial Intelligence.
* Consultation with people with disability and peak representative organisations.
* Providing training on how to develop and utilize AI that is free of algorithmic bias
* Following a privacy-by-design process to embed privacy processes in the development, deployment, and training of AI products used by banks and financial institutions to improve accessibility.

• Monitoring AI systems to ensure algorithmic bias does not arise in practice.