

Communications Alliance  
PO Box 444  
Milsons Point NSW 1565

9 August 2018

**RE: Endorsement of ACCAN Submission to Review of Telecommunications Consumer Protections**

To whom it may concern.

Vision Australia is pleased to endorse the submission to Communications Alliance by the Australian Communications Consumer Action Network (ACCAN) in relation to the current review of the TCP Code. Our endorsement includes the main content in the ACCAN Submission as well as the recommendations it contains.

Vision Australia is a member of ACCAN, and has regular dialogue with ACCAN staff about the telecommunications-related needs of our clients who are blind or have low vision. We are very confident that ACCAN have a thorough and nuanced understanding of those needs, and that this understanding is reflected in the ACCAN Submission.

In providing our endorsement of the ACCAN Submission, we draw the attention of Communications Alliance to three deficient areas in the TCP Code that are of particular concern to us.

**Access to Billing and other Information**

For many years Vision Australia has advocated strongly and consistently that all telecommunications-related information available for consumers must be provided in formats such as braille and large print that are accessible to people who are blind or have low vision. This information includes bills that relate to the use of telecommunications products and services. While some providers make their bills available in braille and large print, most do not. At the same time, many people who are blind or have low vision, particularly those in older age groups, do not have access to the internet, and even those who do are often not able to read their bills online because they have been provided in a format that does not comply with accessibility guidelines.

We are strongly of the view that the TCP Code has continually failed to ensure that critical information such as bills is accessible to people who are blind or have low vision.

A related point is the continuing refusal of the telecommunications industry to mandate compliance of its websites with the Web Content Accessibility Guidelines. The TCP Code's suggestion that telcos should "have regard to" those guidelines is completely unacceptable and does nothing to ensure that people who are blind or have low vision will be able to use a website. We know from client feedback that very few telco websites are compliant with the Web Content Accessibility Guidelines, and often they are usable

by sheer luck or perseverance rather than good design. It is time for the TCP Code to demonstrate a commitment to full inclusion.

### **Customer Service**

We regularly receive reports from people who are blind or have low vision that the customer service staff at telecommunications providers have little or no understanding of their needs. This is particularly the case for staff who are located in offshore call centres. One client reported that she had asked a telco if she could have her bill in braille, whereupon the staff member assumed she meant "rail", and that the client was therefore calling from a train. It can be very difficult to have an accessibility-related inquiry escalated to a staff member who has an appropriate level of training and understanding, and people who are blind or have low vision are often left frustrated, dissatisfied, and feeling that their needs are being ignored or trivialised.

We believe that the TCP Code must include much more stringent requirements for customer service staff to receive disability awareness training.

### **Accessibility**

There are very few telecommunications products available in the Australian market that are designed specifically for people who are blind or have low vision. Some mainstream products are nevertheless usable, but some are not. In the latter category are most products that have touchscreens (exceptions being the iPhone and Android phones), and products that rely extensively on dynamic onscreen menus to perform functions such as changing settings. We have heard from clients that they are generally unable to find out whether a particular mainstream product will be accessible to them.

One client noted:

"Once I had the NBN installed I needed to find a DECT telephone that I could use. I asked around but none of the telco staff could tell me whether I would be able to use any of their products, or whether particular products would be easier for me to use than others. They were quite happy to sell me anything I wanted of course, even if it turned out that I couldn't actually use it. Almost a year later I still haven't found a DECT handset whose menus are accessible".

While we support the provision of information related to products that have been designed specifically to meet the needs of people with a disability, the reality is that they constitute a very small percentage of the products that are available, and in many cases there are no products that have been so designed. We and other organisations in the disability sector continue to advocate for mainstream products to be developed according to the principles of inclusive design.

An example of a product that comes closest to modelling those principles is the iPhone: it includes a range of features that make it usable by people with a variety of disabilities (including people who are blind or have low vision); yet it has not been designed for people with a disability and would therefore not be included in the information that the TCP Code in its current form requires telcos to provide.

In its current form, the TCP Code presents a barrier to the incorporation and promotion of inclusive design principles, and a continuation of this situation would perpetuate the systemic discrimination against people with a disability that organisations like Vision Australia are trying so hard to eliminate. The Code must reflect the realities that people with a disability live with in the marketplace, and it must do more to increase knowledge and awareness of mainstream products that are usable.

## **About Vision Australia**

Vision Australia is the largest national provider of services to people who are blind, deafblind, 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, deafblind, 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, are deafblind 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, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs
- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Services to blind and low vision children in schools to maximise educational outcomes
- Employment services, including national Disability Employment Services provider
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government

Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising 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 the 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 fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the 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 (BCA), to strengthen the voice of the blind community.

Kind regards



Karen Knight  
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