



Australian
Human Rights
Commission

Information and Communications Technology in the Australian Public Service – the need for change

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1 Introduction

1. The low rate of employment of people with disability in the Australian Public Service (APS) is unsatisfactory in terms of the government's broader objectives, and from the Australian Human Rights Commission's perspective in terms of the right to work of people with disability.
2. The Australian Human Rights Commission (the Commission) sees the wider use of accessible Information and Communications Technology (ICT) as necessary to improving the APS performance on the employment of people with disability.
3. The APS can achieve higher rates of employment for people with disability by finding ways to remove barriers currently obstructing qualified and motivated people with disability. Some of these barriers relate to ICT incompatibility and inaccessibility. In countries such as the United States, Japan and parts of Europe, ICT accessibility issues have already been dealt with successfully. With disability reform and greater employment participation for all Australians currently the focus of much policy debate, the time and need for change to accessible ICT within Australia's workplaces has come.

2 What do we mean by accessible ICT?

4. The term "ICT" refers to the software and systems that are integrated into many aspects of business and public services. It includes devices such as computer software and hardware, telecommunications, and office equipment such as printers, photocopiers and scanners.
5. Manufacturers do not always produce products that achieve a high standard of accessibility. Universal design principles should be applied to all ICT, but currently this is not the case. Where technology falls short of such standards, these products offer limited functionality for people with disability. Universal design recognises the broad spectrum of human needs and based on this recognition develops products that are usable by the widest possible range of people.¹ Universal design is not only important for people with disability, but also for older people, people with an illness or injury and all people who, with a wide spectrum of capabilities, make up human diversity.
6. The accessibility of ICT products depends on additions which will ensure that anyone is able to access the product, regardless of their needs. This involves:
 - a. maximising basic accessibility;
 - b. allowing user configuration;
 - c. allowing a range of interaction methods;
 - d. providing outputs in multiple forms; and
 - e. ensuring compatibility with assistive technologies.²

7. Apple's iPod, iPad and iPhone products demonstrate how universal design features can be integrated into ICT. The native software on these devices allows for configuration to suit a wide range of needs and provides enhanced functionality for users who are blind or vision impaired, users who are deaf or hearing impaired, users who have physical or motor skill limitations and users who experience difficulty with learning or literacy.³ This is a type of product that is not targeted at people with disability, but through accessible and universal design, is available for use by people with disability in addition to the broader public.

3 The case for accessible ICT

8. Although it is possible for people with disability to work successfully in a wide range of roles, some people with disability may require the use of adaptive technology to facilitate their full and equal participation in the workplace. This might take the form of text-to-speech software to enable an employee who is blind to access a work computer, or dictation software to provide the same level of access to an employee who is unable to interact with the computer keyboard using their hands.
9. Adaptive technology is currently provided to employees with disability through the Employment Assistance Fund financed by the Australian Government and administered by Job Access Australia.⁴ The government takes an individual case by case approach to accessibility requirements for people with disability, "retrofitting" the workplace to suit an individual. Although this approach has achieved some positive outcomes to-date, it has not dealt with a range of significant challenges which continue to limit opportunities for the employment and retention of people with disability across the APS.
10. While screen reading and magnification software used by people who are blind or vision impaired can be provided through the Employment Assistance Fund, a number of software systems used by APS agencies are not compatible with these adaptive technologies.^{5 6}
11. In some cases, these issues can be resolved by developing scripts to make the inaccessible software work more efficiently with the adaptive technology used by the employee with disability. This process is facilitated through Job Access Australia. Between March 2014 and March 2015, Job Access Australia reported that they processed 44 requests for scripting-related services totalling \$262,000.⁷ In addition to its high cost, this scripting process can take up to six months to complete, in the meantime leaving the person with disability without the necessary tools to be able to perform the inherent requirements of the job. As well as being highly stressful for the employee, this time lag has negative consequences for the employer and may deter them from recruiting additional staff with disability in the future.
12. Modifications can be provided through the Employment Assistance Fund only once an individual is about to commence, or is already in employment. Inaccessible application processes can lead to discrimination in the recruitment phase. Practical components of the recruitment process requiring candidates to demonstrate a particular computer-related task will be difficult to

achieve if the ICT has accessibility limitations.⁸ These situations work against the objective of securing greater employment of people with disability across the APS.

13. Inaccessible ICT takes many forms and extends beyond computer software. Telecommunications and other business machines such as printers, scanners and photocopiers used in Government agencies also commonly lack accessibility features and present a number of barriers for employees with disability.⁹
14. In light of the above challenges, the Commission expects that better employment results would be achieved if APS agencies adopted policies to ensure that ICT is accessible to people with disability from the outset of the recruitment process.

4 Legal dimensions

15. Promoting inclusive work environments accessible to people with disability is a legislated requirement under the Disability Discrimination Act 1992 (Cth).¹⁰
16. The Australian Government has also ratified the United Nations Convention on the Rights of Persons with Disabilities¹¹ (CRPD), Article 9 of which states:
 - a. “States Parties should ... promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.”
17. In 2010, the Australian Government made a commitment to fulfil its obligations under the CRPD through its endorsement of the National Disability Strategy 2010-2020 (NDS).¹² The NDS establishes a framework to guide the actions of governments as they work towards implementation of the CRPD. The NDS includes the following relevant directions for future action:
 - a. Improve community awareness of the benefits of universal design.
 - b. Promote universal design principles in procurement.¹³

5 International Experience

18. The purchase of ICT products and services accessible to people with disability is currently mandated for Government agencies in the US, Japan and some parts of Europe.¹⁴ If it adopted this practice, the Australian Government could:
 - a. maximise opportunities for the employment and retention of people with disability across the APS;
 - b. reduce the need for the purchase of specialised equipment through the Employment Assistance Fund;

- c. stimulate demand and drive the market towards products that are universally accessible.
19. Guidelines for accessible ICT have been included in the United States Federal Acquisition Regulation since 2001.¹⁵ The US standards were issued by the United States Access Board under Section 508 of the Rehabilitation Act.¹⁶ They apply to computer software and hardware, websites, phone systems and copiers that are developed, procured and maintained by federal government agencies.¹⁷
20. Evidence suggests that the industry's response to mandated accessible procurement has been in general positive, with the US Telecommunications Industry and Association and the Electronic Industries Foundation making the following observations in regards to the US 508 requirements:
 - a. Accessible design can be implemented with only minor changes to a design or manufacturing process;
 - b. Improving accessibility does not necessarily increase development time and cost;
 - c. The cost of accessible design is minor compared to the benefits gained.¹⁸
21. Legislated requirements governing the accessibility of ICT have also been adopted in Japan, with Japan having taken a whole-of-government approach which extends beyond the federal government level.¹⁹
22. **Community Support:** A whole-of-government approach to accessible ICT is supported by the Australian Communications Consumer Action Network, the Australian Federation of Disability Organisations, Blind Citizens Australia, Deaf Australia, Deafness Forum, the National Ethnic Disability Alliance, People with Disability Australia and Vision Australia.²⁰

6 Procurement of ICT in the APS to-date

23. The *APS ICT Strategy 2012 – 2015* sets out whole-of-government priorities and actions relating to ICT products and services. The strategy states: "ICT can provide opportunities to create and support more sustainable and vibrant communities. It offers possibilities for more Australians to access services and participate in the economy, including people with disability or specific needs." While people with disability are clearly referenced in the strategy, it does not include any actions relating to ICT accessibility.²¹
24. In 2010, the Australian Government launched the Web Accessibility National Transition Strategy to guide the cross-agency adoption of the Web Content Accessibility Guidelines 2.0.²² In 2013, the Department of Finance and Deregulation published a subsequent guidance document to inform agencies about the need to consider accessibility requirements in the procurement process. However the Web Accessibility National Transition Strategy and

subsequent guidance related only to web accessibility and did not improve access to non-web related ICT.²³

25. In 2013, the ICT Accessibility Round Table was established as an initiative of the APS Diversity Council. Its establishment was the result of a growing recognition of the benefits of accessible ICT and the need to address ICT-related barriers for people with disability in the workplace. The Round Table was chaired by the General Manager of Health Programs at the Department of Human Services and its membership comprised representatives from nine APS agencies.²⁴

26. In 2014, the Round Table produced a report entitled 'the benefits of accessible and inclusive ICT across the Australian Public Service'. The report was presented to the APS Diversity Council in May 2014. The Council agreed to progress the recommendations referenced in the report. One of these actions recommended that the following matters be referred to the Secretary's ICT Governance Board (SIGB) for consideration:

- a. Adopt the Australian Government Information Management Office (AGIMO) accessibility requirements in ICT procurement for web-based products to all ICT related procurements;
- b. Refresh and promote the AGIMO Better Practice Checklist for Assistive Technology;
- c. Develop and implement Quality Assurance programs which focus on evaluating accessibility compliance and compatibility with assistive technology software;
- d. Develop and implement service level standards that give priority to ICT accessibility issues;
- e. Ensure that acquisition and personalisation of assistive technology software and hardware is embedded in agencies' ICT policies;
- f. Develop and implement ICT Teleworking solutions that are fully operable with assistive technology;
- g. Provide training to ICT professionals in relation to accessibility compliance principles and practices;
- h. Ensure that future changes to ICT policies take into account the needs of all employees, including those with disability.²⁵

27. The Commission has been advised that the Secretary's ICT Governance Board was disbanded in late 2014. As responsibility for the implementation and subsequent review of the *APS ICT Strategy* and the above recommendations previously sat with SIGB, the status of these measures requires further clarification.

28. In December 2014, the Department of Finance released a request for tender for the establishment of a Whole of Government ICT Hardware and Associated Services Panel. Clause 2.1.1 of the request stated:

- a. “It is desirable that all products comply with Section 508 of the Rehabilitation Act of 1973 (United States) and/or the European Standard on accessibility requirements for Information and Communication Technologies (ICT) products and services EN 301 549.”²⁶

29. The Commission commends the Department of Finance for referencing accessibility criteria in the request for tender. Further, the Commission understands that the new Digital Transformation Office (DTO) established under the Department of Communications will be responsible for leading the government’s digital transformation agenda to achieve all APS agencies operating within this framework. The Commission understands that the Department of Finance will retain responsibility for policies and guidelines relating to ICT procurement, and that the DTO will work closely with the Department of Finance to coordinate procurement processes.²⁷

7 The way forward

30. Increasing opportunities to maximise the employment and retention of employees with disability across the APS is a Commonwealth government policy objective. *As One*, the Australian public service disability employment strategy set out a total of 19 strategic initiatives to be implemented across the APS over a two year period (2012-2014) to work towards this goal.²⁸

31. The Commission commends the government on progress to-date with the implementation of the initiatives outlined in *AS One*; including the rollout of the *RecruitAbility* guaranteed interview scheme,²⁹ the establishment of the APS Diversity Council³⁰ and the launch of the ‘Leading the Way’ video series.³¹ The continued underemployment of people with disability across the APS, however, is evidence of the fact that further work still needs to be undertaken.

32. *WORKAbility II*, the Commission’s 2005 report that was borne out of a national inquiry into employment and disability recommended:

- a. “That the Commonwealth government commence a Regulation Impact Statement process which examines the option of adopting a government accessible procurement policy similar to section 508 of the *Rehabilitation Act 1973* in the United States.”³²

33. The Commission continues to regard this above recommendation as relevant and urges its implementation.

34. The 2015 Report of the Reference Group on Welfare Reform to the Minister for Social Services, “A New System for Better Employment and Social Outcomes”, explicitly recognises the role that procurement, and access to ICT more broadly can play in facilitating an increase in the employment and retention of people with disability.³³

35. The Commission anticipates that the establishment of the DTO and the intended shift towards a shared services model for APS agencies presents a

timely opportunity for Government to implement change in ICT procurement policy and proposes the following options:

- a. That the Department of Finance Liaise with DTO to identify an appropriate point of referral for tasks that previously sat with the Secretary's ICT Governance Board (SIGB); including the progression of the recommendations from the 2014 ICT Accessibility Round Table report and implementation of the APS ICT Strategy.
 - b. That, should the government intend to review and update the APS ICT Strategy 2012-2015, the revised strategy include clear actions relating to ICT accessibility.
 - c. That the DTO and the Department of Finance be involved in the future work of the ICT Accessibility Round Table.
 - d. That the recommendations of the 2014 ICT Accessibility Round Table are progressed, particularly the implementation of service level standards to drive a whole-of-government approach to accessible procurement. These standards should include ICT deliverables to measure the accessibility of computer hardware and software, mobile devices, printers, photocopiers and scanners.
 - e. The government may wish to adopt existing international standards for ICT accessibility, or develop a new set of standards to suit the Australian context. These same standards should also apply to ICT that is developed in-house by APS agencies.
 - f. That a Government Product Accessibility template be developed for vendors. This could use the modelling work that has been undertaken in the United States. The template should allow vendors to report on and demonstrate how products comply with a range of standard ICT deliverables.³⁴
 - g. That, subsequent to the adoption of service level standards for accessible ICT, the government develop a transition strategy to guide the implementation of the standards across APS agencies. The government could use the *Web Accessibility National Transition Strategy* and its accompanying guidance document as a foundation for this work.
 - h. That, in line with the recommendations of the ICT Accessibility Round Table, tailored training on ICT accessibility be provided to Chief Information Officers across the APS to assist with the transition to a more inclusive procurement model.
36. The Commission encourages the APS to consult in all these matters with APS agencies who have already undertaken work in relation to accessible ICT procurement, such as the National Disability Insurance Agency. Broader consultation with civil society is also recommended. Consideration should also be given to work that has already been undertaken on accessible ICT internationally, including the online tool kit developed by the International

Telecommunication Union³⁵ and the Global Initiative for Inclusive ICTs, “e-Accessibility Policy Toolkit for Persons with Disabilities”.³⁶

8 Appendix – Private Sector Examples

Although we are yet to see a whole-of-government approach to accessible procurement in Australia, several private businesses have made significant progress in the area of accessible ICT procurement and understand this to be a key element of good governance.

- ANZ Bank has appointed a Global Technology Accessibility Manager to lead the implementation of the ANZ Disability Inclusion Access Plan 2012-2015.³⁷ The plan sets out a number of directives that the bank is expected to follow in order to maintain its status as a disability-confident business, one of which reads: “Include accessibility criteria in tenders, contract management activities and internal requirements for workplace and customer technologies.”³⁸
- Westpac has similarly identified universal design as a core priority in its current Disability Action Plan, expanding on a number of positive outcomes that had already been achieved under the previous plan. It has a strong focus on universal design, considering the accessibility of documents, online learning modules, and ICT that is used by employees and customers alike. Westpac boasts one of the highest levels of employment of people with disability in corporate Australia, with 12.1% of employees having disclosed that they had a disability in 2012.³⁹
- Telstra has also made a significant commitment to product accessibility. The company’s current Disability Action Plan states that one of its core objectives is to: “Utilise Telstra’s supply chain to promote opportunities for people with disability”, one of the core actions supporting this commitment is “Including accessibility criteria in tenders for ICT products and services”.⁴⁰

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⁴ Job Access Australia, 2012, ‘About Us’, at <http://jobaccess.gov.au/content/about-us> (viewed 25 March 2015).

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¹⁶ The Rehabilitation Act of 1973 (29 USC 792), <http://www.section508.gov/section508-laws> (viewed 7 April 2015).

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