



vision australia

blindness and low vision services

The Secretary
Senate Standing Finance and Public Administration
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Inquiry into the provisions of the Human Services (Enhanced Service Delivery) Bill 2007

Re: Draft Exposure Bill
Human Services (Enhanced Service Delivery) Bill 2007

Vision Australia is the newly merged organisation incorporating the former businesses of Royal Blind Society of NSW, Royal Victorian Institute for the Blind, Vision Australia Foundation, the National Information and Library Service and recently, the Royal Blind Foundation of Queensland. We are the largest blindness agency in Australia with a long history of professional service delivery.

Our organisation's purpose is to provide assistance to people who are blind or vision impaired so that they can access, and fully participate in, all facets of life. For example, our organisation attempts to remove barriers that prevent people who are blind or vision impaired from enjoying equal access and opportunities to participate in all facets of the community. In our efforts to provide these services, Vision Australia promotes awareness to government, government departments, community services and the general public about the barriers faced by people, who are blind or vision impaired in a predominantly sight orientated society.

Vision Australia appreciates this opportunity to comment on the draft exposure Bill - Human Services (Enhanced Service Delivery) Bill 2007, the access card bill, and to raise issues of concern for people who are blind or who have low vision in relation to the Access Card.

1. Objects of the Act.

We fully support the objects of the Act as stated in the exposure draft. To have a simplified approach to accessing Government's services through the use of one card rather than multiple cards is certainly more user friendly for people who are blind or who have low vision. The introduction of the access card to replace many of the current Government based cards affords us a huge opportunity to rationalize the number of cards a person might have, however the key to maximizing the card's usability and effectiveness for people who are blind or who have low vision lays in the card design, its potential to be used as an ID card, and the use of personal preference information which might be stored on the card. We have commented on these issues below.

We note that the exposure draft states that one of the objectives is "(e) to permit access card holders to use their access cards for such other lawful purposes they choose" however it also states "It is not an object of this Act that access cards be used as national identity cards".

Vision Australia is strongly of the view that the access card should be able to be used as a voluntary form of proof of identity and that it should carry the same status as a passport, a birth certificate or drivers license. People who are blind or who have low vision do not have a drivers license and this often causes a real difficulty in situations where proof of identity is required.

While we agree that the card should not be a national identity card nor a mandatory form of proof of identity, we would like to see the card carry the maximum points when opening bank accounts, registering vehicles etc, and that Government authorities and businesses, such as banks and airlines, must accept the access card as a legitimate form of proof of identity when it is offered by a card holder.

In order to ensure that the access card is recognized as a legitimate form of proof of identity and that it carries the maximum point status we ask that Government review and, if necessary, amend the Financial Transactions Reports Act (1988) and that AUSTRAC be asked to inform businesses such as financial institutions that the access card has this status.

2. Registration.

The exposure draft indicates that individuals will need to apply for an access card through a registration process. Vision Australia has no issue with this however we want to highlight the fact that hard copy written application processes are problematic for people who are blind. There are already a number of existing Government services which require hard copy written forms and processes which people who are blind or who have low vision cannot complete with independence and privacy. We note that the exposure draft indicates that the application and registration process could have some flexibility- "(b) making an application (whether or not in writing) in a manner approved by the Secretary" and we urge Government to implement an application and registration process which will allow a person who is blind to complete the process independently and privately.

3. Information on the face of the card.

We don't have any concerns regarding the proposed information to be displayed on the face of the card as detailed in the exposure draft. Vision Australia's concern is in regard to the physical design and layout of the card and the risk that if it has poor colour contrast and small or cluttered print it will be inaccessible for people with low vision. We have attached some material regarding print size, colour contrast and font styles.

Vision Australia also calls on Government to ensure that the access card has a tactile component so that people who are blind will be able to identify the card. This is an important issue as people often possess multiple cards of a similar size and feel, and we need to be able to distinguish the access card from other cards.

A tactile "A" could be designed into the card so that it would be readily identifiable by look and feel. This solution would be in line with recommendation 9 put to Government by the Consumer and Privacy Task Force and with Government's response to recommendation 9. Relevant extracts from the Task Force recommendations and Government's response are quoted below.

Text Extracts

1. From document: Government response to Taskforce Report No.1

Disability Feature

Recommendation 9. A feature be built into the Access Card itself to render it as disability-friendly as possible and that all Access Cards be produced in this way.

Response

The Australian Government supports Recommendation 9.

2. From document:

Access Card Consumer and Privacy Taskforce report No.1

DISABILITY FEATURE

There is a strong case for the Card itself to be manufactured in such a way that people with a variety of disabilities find the Card "friendly" to use. It would be undesirable for the Access Card to be physically indistinguishable from the variety of other cards that people will continue to have in their possession and equally undesirable for people with disabilities to be unable to recognise these cards and how they need to be inserted into readers without having to rely on third parties.

This is a simple problem to address and there are a variety of alternatives which might be considered (raised printing as with Braille; the use of large font printing; beveled or chamfered corners, indentations, milling, lacunae etc). The Taskforce has been advised by card manufacturers with whom it has spoken that there are no technological barriers to this and that there are no major cost implications – although the latter point would need more express confirmation. The Taskforce does not wish to be prescriptive in this matter and believes that the Government should accept our Recommendation in principle and then consult widely with the Disability Commissioner and the disability community about the precise nature of the features to be developed or used.

It is not desirable, in the view of the Taskforce for such disability-friendly cards to be issued only to people with disabilities – this may constitute further stigmatisation of such individuals – something which current public policy and anti-discrimination legislation seeks to minimise or eliminate.”

An important point acknowledged by the Task Force is that the disability friendly features built into the card design needs to be generically applied to all cards, not just those issued to people with a disability. Vision Australia would like to reinforce this and point out that by building accessibility into all aspects related to the card, beginning with the application and registration processes, to the card itself and even on to the electronic card readers, that Government will be demonstrating its commitment to inclusion of people with a disability. It must also be made clear that if any component related to applying for, issuing, using or managing the access card is not accessible Government will be putting barriers in the way of people who are blind and in particular may be jeopardising employment opportunities for people who are blind. For example, if there is a requirement for Centrelink Customer Services Officers to access information on a Centrelink customer’s card using a card reader and the reader, or the card, is not designed in an accessible way, people who are blind will not be able to work as Centrelink Customer Services Officers.

Vision Australia has significant experience regarding accessibility and we are keen to work with Government to ensure that all aspects of the access card are made accessible.

4. Information to be stored on the card memory chip.

We note that the exposure draft sets out the information which will be contained on Government’s part of the card memory chip and limits the detail of this information- “The Commonwealth’s area of the *chip in your access card must only contain the *information specified in subsection 160(1)”. We agree that Government must have the right and ability to control and manage such information and that it must not be accessible to individuals, businesses, institutions or authorities other than those approved by Government. We do ask however, that Government consider including a field on Government’s part of the chip which will identify the preferred format for Government related correspondence with the card holder. This would mean that if a person who is

blind and who is a Braille reader has dealings with Medicare that Medicare would automatically know that any correspondence with this customer needs to be in Braille.

5. Information stored on the card holders part of the chip.

Vision Australia supports the concept of allowing card holders to store, manage and manipulate information on a part of the memory chip. We want to ensure however that the software and hardware developed to allow individuals to upload, change and read such information be designed in a manner which ensures that it is compatible with adaptive technology such as synthetic speech screenreaders and screen magnification software.

This is extremely important as it will mean that a card holder who is blind or who has low vision and uses adaptive technology will be able to manage their card based information with independence and privacy. It also means that individuals who are blind or who have low vision who are employed in jobs which require them to access information on a card holders card will be able to “read” the information.

6. Promotion.

Given the importance of applying for an access card in order to access many Government services Vision Australia is keen to ensure that in promoting the card to the Australian community that it does so in a manner which reaches people who are blind or who have low vision. Promotions which are primarily undertaken through print media have an extremely low penetration into the community of people who are vision impaired or who have other print disabilities. We are strongly of the view that all promotional material, including ongoing calls for community consultation, be produced and delivered to people with a print disability in formats and through media which meet their information needs. Vision Australia is experienced in alternative format material production and has a network of contact with accessible media. We are keen to work with Government to ensure that information about the access card reaches people with a print disability.

7. Recommendations.

In this section Vision Australia sets out recommendations drawn from the above comments.

7.1 That the access card should be able to be used as a voluntary form of proof of identity.

7.2 That the access card should carry the same points status as a passport, a birth certificate or drivers license.

7.3 That Government review, and if necessary, amend the Financial Transactions Reports Act (1988) to include the access card with maximum

points status and that AUSTRAC be asked to inform businesses such as financial institutions that the access card has this status.

7.4 That Government authorities and businesses, such as banks and airlines, must accept the access card as a legitimate form of proof of identity when it is offered by a card holder.

7.5 That Government implements an application and registration process which will allow a person who is blind to complete the process independently and privately.

7.6 That the access card has a tactile component so that people who are blind will be able to identify the card.

7.7 That the card design includes adequate colour contrast, print size and font so that the usefulness of the card is maximized for people with low vision.

7.8 That the disability friendly aspects of the card design be generically applied to all cards not just those issued to people with a disability.

7.9 That all aspects relating to application and registration processes be designed in such a way as to make them accessible to people who are blind or who have low vision.

7.10 That the technology developed for accessing information on the card, the card reader, be designed so that it is accessible and useable by people who are blind or who have low vision.

7.11 That the interface for a card holder to manage the information stored on their part of the memory chip be accessible for people using adaptive technology.

7.12 That Government consider including a field on Government's part of the chip which will identify the preferred format for Government related correspondence with the card holder.

7.13 That all information and material relating to promotion and consultation for the access card be produced and delivered in formats and media channels which meet the access needs of people with a print disability.

8. Conclusion.

Vision Australia is supportive of the proposed introduction of an Access Card. We are of the view that if the recommendations we have made in this submission are incorporated into the design and management of the card and processes related to the card it will maximize the cards usability and effectiveness for people who are blind or who have low vision. We emphasise again, that all aspects of the card and its uses must be fully accessible if

people who are blind will have equal use, both as card holders and as workers accessing other card holders card, as citizens who are sighted.

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