

4 May 2016

The Manager  
Communications Accessibility  
Department of Communications and the Arts  
PO Box 13310  
Law Courts  
Melbourne VIC 8010

Via email: [accessibility@communications.gov.au](mailto:accessibility@communications.gov.au)

## Communications accessibility: 2016 and beyond

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the peak, national body representing Australians from culturally and linguistically diverse (CALD) backgrounds. We work to promote fairness and responsiveness to our constituency in the delivery and design of government policies and programs. FECCA strives to ensure that the needs and aspirations of various cohorts of Australia's culturally and linguistically diverse population, including people with disability, are heard by policy and decisions makers, as well as the broader public. FECCA collaborates with key stakeholders, including the National Ethnic Disability Alliance (NEDA), to advance its work.

FECCA thanks the Department of Communications and the Arts for the opportunity to make a submission to the communications accessibility consultation process.

### General comments

According to the *Survey of Disability, Ageing and Carers*, 4.2 million or 18.5 per cent of Australians live with disability.<sup>1</sup> More than 1 million people with disabilities in Australia are from CALD backgrounds.<sup>2</sup> In other words, CALD people constitute close to one fourth of the total number of people with disabilities living in Australia. These individuals are often subjected to two fold discrimination based on their disability as well as their CALD background.

---

<sup>1</sup> Australian Bureau of Statistics, *Survey of Disability, Ageing and Carers* (2012).

<sup>2</sup> National Ethnic Disability Alliance, *Disability Employment Services (DES) Consumer Engagement Project* (June 2014), 4, accessed at:

[http://www.neda.org.au/images/reports/NEDA\\_DES\\_PROJECT\\_2014.pdf](http://www.neda.org.au/images/reports/NEDA_DES_PROJECT_2014.pdf)

It is encouraging to learn that the Department is aware of the communications accessibility developments made available by other Government initiatives. Communications accessibility is particularly important in the context of the National Disability Insurance Scheme (NDIS) and parallel developments that are taking place in aged care sector. Low engagement and uptake of services by people from non-English speaking backgrounds can be addressed by working collaboratively across sectors.

Currently, people speaking other languages wishing to speak to a National Relay Service (NRS) user, can call Translating and Interpreting Service (TIS National) and request the operator to call the NRS. There are options for bilingual NRS users to use a foreign language for portions of the call that do not require an operator to relay a text or voice. It is not clear as to the number of people from non-English speaking backgrounds using the service, or the level of awareness among these communities about the NRS.

The need to address issues faced by vulnerable cohorts of the community with developments in technology is imperative. However, it is concerning that except for one reference in relation to digital literacy,<sup>3</sup> the consultation paper is silent on service provision to people from CALD backgrounds. Limited English language proficiency, lack of or limited computer and internet literacy, preconceived ideas about online security and understanding and navigating the complex online services are some of the barriers faced by this cohort. Thus, we encourage the Department to consider the issues and needs of people from non-English speaking backgrounds in depth in this review process.

FECCA commends the NRS for including a section on its website titled 'Aboriginal and Torres Strait Islander peoples and the NRS' which provides information in relation to NRS, accessibility, mobile applications and videos.<sup>4</sup> Considering the importance of engaging people from non-English speaking backgrounds and the similarity of access and equity issues faced by CALD communities and Aboriginal and Torres Strait Islander peoples, FECCA recommends adopting a similar approach for people from CALD backgrounds where information is available in simple language in a culturally appropriate manner.

### **Manage the demand for NRS services**

An option suggested in the consultation paper is to introduce a 'capping arrangement' for some services provided by the NRS. FECCA is concerned that a capping system based on time will adversely affect people from non-English speaking backgrounds who may need additional supports, such as use of TIS National for communicating with others.

### **NRS outreach programme**

The four activity streams in operation include promotion and awareness raising and training. It is important that the Department identifies the particular needs and cultural sensitivities in working with CALD communities. Specific training may be of use in understanding the differences between Auslan and sign languages used in other countries.

FECCA has highlighted on a number of occasions that communication mechanisms and awareness-raising should be tailored according to specific communities. While certain communities may access services and information online and are aware of the government

---

<sup>3</sup> Department of Communications and the Arts, *Communications accessibility: 2016 and beyond*, 19.

<sup>4</sup> <http://relayservice.gov.au/support/aboriginal-and-torres-strait-islander-peoples-and-the-nrs/>

services available to them, certain less established communities may not have access to computers and internet and may have limited computer literacy. Use of ethnic media such as ethnic newspapers and ethnic radio, engaging community organisations or faith-based groups are more pragmatic means in raising awareness in CALD communities.

It would also be beneficial to identify role models or young people from non-English speaking backgrounds who are using these services to create awareness about these services and encourage other community members to access these services.

### **Encouraging initiatives to improve digital literacy**

Recent developments in the technology used by the government have had a number of positive and successful outcomes. For example, the Department of Human Services has developed mobile phone applications for income reporting purposes in a number of different languages, which is an effective and efficient way of using the technology to ensure that the services are more user-friendly and accessible. A similar approach can be adopted by the Department of Communications and the Arts to address the limitations faced by people from non-English speaking backgrounds in accessing the NRS.

### **Recommendations**

- Ensure that the consultation process and the final product are inclusive of and cater for Australia's cultural and linguistic diversity.
- Provide information to CALD communities about the availability of these services in a culturally appropriate manner, similar to the NRS service provision for Aboriginal and Torres Strait Islander peoples.
- Engage people with low English language proficiency in developing programmes to raise awareness and training in order to ensure that such engagement mechanisms and tools are effective and appropriate.
- Provide clearly identified information online in community languages, utilise interactive technologies to improve the experience for non-English speakers.
- Use simple and consistent icons across platforms.
- Ensure that measures adopted to address the cost of service delivery take special needs into consideration including the length of calls when they are made through TIS National.