



## Council of Social Service of New South Wales

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Ms Jacqueline Daly  
Consumer Policy and Post (NRS Review)  
Department of Broadband, Communications and the Digital Economy

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### **Review of access to telecommunications services by people with disability**

The NSW Disability Network Forum conducted a discussion to scope the issues involved in access to telecommunications by people with disability. The NSW Disability Network Forum wishes to address its response across the Terms of Reference, and on general access to, and understanding of, the use of telecommunications technology to promote the participation and inclusion of people with disability in society and local communities.

#### **About the NSW Disability Network Forum**

The NSW Disability Network Forum was initiated in June 2011, as part of new funding from Ageing, Disability and Home Care, Department of Family and Community Services, to represent and promote the interests of people with disability and to provide a mechanism to advance common interests amongst a diverse range of disability organisations and representatives. The NSW Disability Network Forum presents a new opportunity for non-government, non-provider peak, advocacy and information agencies to help to shape a new future for people with disability in NSW. The aim of the Forum is to build capacity within and across all organisations and groups so that the interests of people with disability are advanced through policy and systemic advocacy. The Council of Social Service of NSW NCOSS provides secretariat support to the Forum.

A list of the members of the NSW Disability Network Forum is included at the end of this submission.

#### **COST versus investment**

As advances in telecommunications technology evolve, people with disability can find that some earlier barriers to inclusion no longer apply in communicating and connecting with others. The flow on effect of these diminished barriers is improved personal choice and control, enhanced social inclusion, improved access to supports and new possibilities for employment, achievement and independence. The cost of new technologies can be prohibitive, however, for people with disability who may have been forced to rely on limited resources and/or income support. The NSW Disability Network Forum cautions that there is false economy in not providing early access to assistive telecommunications technology to people with disability. Planned investment in telecommunications technology and its maintenance for people with disability will open new opportunities, encourage skills and talents and enable self-reliance, and thereby could contribute to reductions in unnecessary intensive supports.

Consequently, the NSW Disability Network Forum supports the development of low-cost and/or subsidised telecommunications technologies for people with disability as an entitlement.

## **Accessible information**

Information has become a currency of today as never before. The use of timely and appropriate information in formats that can be readily understood by the user can mean the difference, for a person with disability and their family, between struggling from day to day or living a reasonable life. With appropriate information, the person with disability can ensure that they can engage necessary supports in the best possible manner, capitalise opportunities, make choices.

People with disability are increasingly working towards more person-centred approaches, meaning the person makes their own decisions and tailors their supports, both disability specific and other, around that person.

For people with disability, access to information is not just about specialist services. Like everyone else, it is about banking and health, employment and education, shopping and entertainment, leisure and socialising, friends and family and so on. But if your main information channel to these important aspects of your life is primarily through telecommunications services, as it is for some people with disability, then these services become very essential to your daily life. Access to telecommunications services for these people is not only essential, it is necessary, vital, and indispensable. Consequently, any lack of access must be immediately addressed.

## **Toll-free access via mobile phones**

Many people with disability primarily own and use personal mobile phones. These, however, can be an expensive option in finding or reaching services etc if a person does not have regular, easy or private access to a landline. Toll free access to help lines and call centres etc mostly depends on use of a landline and increased charges apply to mobile phones.

The NSW Disability Network Forum is concerned that this can unfairly discriminate against people with disability in accessing essential, important and supportive toll free services that are available to the rest of the community.

## **Information about what is available to people with disability**

The NSW Disability Network Forum understands that telecommunications technology and usage evolves rapidly. As already stated, for people with disability this can prove a lifeline to participation and inclusion. However, this participation and inclusion is only as good as the readily available information about the technology and access to it. Therefore, the NSW Disability Network Forum contends that information to people with disability should be a priority for telecommunications decision-makers, regulators and companies.

This information should cover no less than:

- What technologies are available to people with various diverse disabilities
- Subsidies available and how to access them
- How people with disability might make use of the technologies
- Adaptations that might be useful
- Community languages
- Plain language guides
- Information in many formats
- Information distribution to the wider community
- Above information constantly updated

In this way, many people with disability can have access to essential telecommunications technologies and their families, friends and other supporters can also support and encourage their independence and inclusion.

### **Equipment for Deafblind people**

Deafblind people rely on Braille and TTY machines for their communication needs. The NSW Disability Network Forum heard reports of severe frustration from people in the Deafblind community when having to rely on obsolete equipment that often breaks down, effectively cutting off lines of communication. Given that this is an extremely important issue, even though for a relatively few people, the NSW Disability Network Forum contends that Braille and TTY equipment must be kept up to date and appropriately maintained as a priority.

Originally, Deafblind people used Telebraille machines in place of the TTY, and then there was the Krown. While neither of these machines is still manufactured, both continue in general use and often break down, requiring constant repairs. The latest equipment for Deafblind people is the Deafblind Communicator, which can be used as a TTY. This is an ideal replacement for the Krown and earlier machines.

The cost of the Deafblind Communicator and other preferred equipment is prohibitive however for people with disability who rely on limited resources and fixed incomes. Both the Telebraille and the Krown were classified as telephones and consequently made available for rental.

It is strongly recommended that the Department considers the classification of similar updated, reliable and currently manufactured equipment (such as the Deafblind Communicator) so that access on a rental basis could be available to people with disability and their families and networks. This should be provided in conjunction with equipment provision/subsidy schemes through States and Territories.

### **Accessible complaints**

The NSW Disability Network Forum is not only concerned at the accessibility of telecommunication technology for people with disability but equally for access to complaints mechanisms. Accessibility principles must be applied to the mechanisms of complaints. In this way, the best possible access can be obtained for individuals with disability to telecommunications, and systemic improvements can be built-in to provide broader access on an ongoing basis.

### **Contracts that exploit**

Much has been written about vulnerable people who have been inadvertently caught into telecommunications contracts they have not fully understood or that were exploitative. The NSW Disability Network Forum is aware of the prejudice that many people with disability still endure in Australia. The increasing importance of telecommunications to almost every aspect of a person's life makes any exploitation in this area extremely serious. When coupled with other challenges in daily life, such as disability, any subtle or deliberate disregard or misdirection can have magnified consequences.

In the case of telecommunications contracts for people with disability, including people with intellectual and cognitive disability, there must be sufficient consideration for a person to be able to leave a contract without penalty, where the contract would disadvantage that person. This must be an obligation for telecommunications companies and must not inhibit the access of people with

disability to enter into contracts for telecommunications services. There needs to be a balance, a balance that does not disadvantage people whose vulnerability may put them at risk. Nor must that vulnerability exclude them from participation in essential telecommunications that can enhance their quality of life.

### **Education in the National Relay Service HEE**

The NSW Disability Network Forum discussed the National Relay Service and recommends an increase in education services surrounding the National Relay Service. More education is needed on what the National Relay Service does, who can use it, how it is used and where to find it. The NSW Disability Network Forum recommends a significant investment in education about the National Relay Service.

### **Interpreting Services for people with disability**

People with disability and their families, like the rest of the Australian population, also comprise people from a diverse range of backgrounds. People with disability also use other languages. The NSW Disability Network Forum advises that Language interpreting services must be available throughout the telecommunications industry, within technologies and in the provision of telecommunications services to people with disability and their families as an access issue. Access for people with disability must always include access accounting for the disability, as well as access for language and cultural factors, and geographic and financial issues.

### **People with disability and the telecommunications industry**

The importance of including all people with disability *upfront* in telecommunications services, developments and advances cannot be overestimated. The NSW Disability Network Forum respectfully submits that the inclusion of people with disability should form a series of industry outcome measures of success or achievement, Key Performance Indicators, reported in contracts and evaluations, linked to tenders.

### **Aboriginal People with Disability**

The Aboriginal Disability Network of NSW is a member organisation of the NSW Disability Network Forum and as such the NSW Disability Network Forum supports its submission.

### **In conclusion**

Increasingly, advances in telecommunications have been opening up new opportunities for inclusion and participation for people with disability. For a person with disability, telecommunications can help to shift the focus away from disability towards an individual's strengths and talents.

Equally, when everyone has embraced new telecommunications technologies to enhance their daily lives, many people with disability have been left behind. Where access to telecommunications services is poor or patchy, the effect for people with disability is typically isolation and exclusion from the local community and society in general. It can create a multiplier effect, exacerbating barriers to participation that reduce quality of life and force dependency.

The NSW Disability Network Forum argues that equitable, easy, and affordable access to telecommunications services for people with disability is a right and an investment in the future. It

could diminish the impact of disability for some people as they seek to participate financially and socially in their communities. It could give some people with disability more control over the decisions that affect their lives. It could also involve people without disability with people who they may never have been in contact with before.

Thank you for the opportunity to provide feedback from the NSW Disability Network Forum.

Should you require clarification or more information, please contact Christine Regan, Disability Network Forum, Senior Policy Officer, NCOSS, on 02 9211 2599 ext 117 or [chris@ncoss.org.au](mailto:chris@ncoss.org.au)

Yours sincerely,



Catherine Mahony  
Acting Director

**Member organisations of the NSW Disability Network Forum:**

Aboriginal Disability Network NSW  
Association of Blind Citizens of NSW  
Brain Injury Association NSW  
Citizen Advocacy Western Sydney  
Council of Social Service of NSW  
DeafBlind Association NSW  
Deaf Society of NSW  
Institute for Family Advocacy  
Intellectual Disability Rights Service  
Multicultural Disability Advocacy Association of NSW  
NSW Consumer Advisory Group - Mental Health  
NSW Council for Intellectual Disability  
NSW Disability Advocacy Network  
Physical Disability Council of NSW  
People with Disability Australia  
Self Advocacy Sydney  
Positive Life NSW