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**DISABILITY
SERVICES
COMMISSION**

making a difference

The Secretariat
Product Safety Review
Competition and Consumer Policy Division
Department of the Treasury
Langton Crescent
CANBERRA ACT 2600

Dear Sir/Madam

Thank you for your letter dated 31 August 2004. The Disability Services Commission welcomes the opportunity to comment on the *Review of the Australian Consumer Product Safety System discussion paper*.

The Commission is a State Government Agency and is responsible for policy and program development, and service planning in all areas that affect the rights and needs of Western Australians with disabilities.

The following comments are provided in relation to the need to provide accessible information, in particular, information provided in a printed format or provided on the internet.

People with Disabilities in WA

The Australian Bureau of Statistics' (ABS) *Survey of Disability, Ageing and Carers 1998*, identifies 19.5 percent, or one in five people in Western Australia as having a disability.

While people may have a disability at any age, the likelihood of this increases as people get older. For example, almost five percent of the population under five years has a disability compared to almost 50 percent of Western Australians over 60 years of age. The Disability Services Commission estimates that the total number of people with disabilities will increase by 48 percent by the year 2021.

People with disabilities consistently report that they do not have the same opportunities as others to participate in community life. They face daily barriers such as being unable to hear what is said, see print, climb stairs or understand signage.

Most barriers that people with disabilities experience in relation to information, services and facilities can be avoided through informed planning and management, with minimal additional costs.

Legislation

State and Commonwealth legislation recognises that people with disabilities should have the same opportunities as others to join in all aspects of community life, including access to information. The Disability Discrimination Act (1992) (DDA) is particularly relevant in this area.

The DDA aims to provide uniform protection against discrimination for all people with disabilities in Australia. The DDA requires that people with disabilities are able to access any building that the public is entitled to enter and use, and have access to any services and facilities provided in those buildings. The Act applies to all levels of government and the private sector.

The DDA allows for individuals to complain to the Human Rights and Equal Opportunity Commission (HREOC) if they consider that they have been discriminated against because of their disability.

Accessible information

Attached is an excerpt from the Western Australian *State Government Access Guidelines for Information, Services and Facilities*. This information can be used as a guide to ensure that the information you produce is accessible to all people.

Yours sincerely



Eddie Bartnik
A/DIRECTOR GENERAL
DISABILITY SERVICES COMMISSION

21 October 2004

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2 Accessible Information

People with disabilities frequently experience difficulty in accessing public information. The types of disability that impact on an individual's ability to access information include hearing loss or deafness, impaired vision or blindness and disabilities that affect the ability to learn or process information (such as intellectual disability and psychiatric illness). Many communication difficulties can be avoided by providing people with a range of communication options so that they can use the one that best suits their needs. More detail on information provision is available in the Information Checklist in the *Access Resource Kit* developed by the Disability Services Commission (see Appendix 1).

Printed information

It is recommended that printed information:

- is made clear and easy to understand through the use of plain English, short sentences, clear headings, no jargon and through the use of pictures or diagrams where appropriate;
- is made clear and easy to read by using a minimum font size of 12 point, and where possible 14 point or larger on brochures and advertising. The use of photocopiers for enlarging text may be an acceptable solution in some situations, however reformatting is preferred to photocopying as this can result in unwieldy A3 sheets, truncated copy and copies of poor quality;
- is produced in a plain and, where possible, sans serif font such as Arial or Helvetica;
- uses text of a dark colour that significantly contrasts with the background;
- is printed on matt, non-reflective paper;
- displays important information in bold and larger print;
- avoids using upper case only, as this is more difficult to read;
- avoids underlining;
- uses a minimum of italics and hyphenation; and
- avoids combining red and green colours in lettering, as this provides poor contrast and is difficult for people who are colour blind to read.

PowerPoint presentations

It is recommended that PowerPoint presentations:

- follow the above principles for printed information wherever appropriate;
- use a minimum of 24 point font size in Helvetica or Arial; and
- avoid text over graphics and other busy backgrounds.

Internet and Intranet Accessibility

The objective of creating accessible web content is to reduce the barriers faced by the wide variety of people who try to access information and services on the Internet. These groups include people with disabilities, people in rural and remote areas who have slow Internet connections and people using alternative technologies to a computer, such as mobile phones to access web sites.

The Premier's Circular number 2002/14, *Website Standards*, provides guidance and a consistent approach to website design and maintenance. The *Guidelines for State Government Web Sites* are available from the Department of Industry and Technology (see Appendix 1).

The State Government website guidelines base access requirements on the internationally recognised *Web Content Accessibility Guidelines* developed by the World Wide Web Consortium (W3C). The W3C Guidelines provide a series of checkpoints that can be used to ensure that web sites are accessible. Each checkpoint has a priority level assigned by the W3C Working Group based on the checkpoint's impact on accessibility.

The State Government guidelines recommend that web sites should:

- at the very least meet the W3C Priority 1 level of accessibility;
- meet the W3C Priority 2 level of accessibility; and
- ideally meet the W3C Priority 3 level of accessibility in order to obtain optimal accessibility for all users.

It is important that website development specifications include information concerning the need to comply with the W3C accessibility guidelines and which priority level the website design should achieve.

Signage

All external and internal signage should be positioned to be clearly visible to people with a disability, in accordance with the Building Code of Australia (BCA), Australian Standards, AS 1428.1 and AS1428.2. International Symbols, maps and other graphics may be useful. The *Australian Standard, AS 2899.1, Public Information, Symbols and Signs* is also relevant.

Better Hearing signs on Public Counters

These stand-up counter cards contain information for staff about communicating with people with hearing impairments. It is recommended that they are placed on all public counters. Better Hearing Kits are available from Better Hearing Australia, WA (see Appendix 2).

Captioning TV Advertisements and Videos

The following requirements are to be met in relation to Government TV commercials and videos.

- Closed captions must be provided on all Government TV advertising including commercials, sponsorships, community service announcements and billboards.
- Open captions must be provided on all Government videos when the videos are:
 - Being shown in a Government office, at an exhibition or trade show, or as part of a public display;
 - Given, lent, sold or hired; or
 - Used for training.

Explanatory note:

Closed captions are used for TV programs. They are called "closed" because you need teletext equipment to see them. Open captions are used for videos. They are called "open" because they are always on screen and don't need any special equipment to watch them – just an ordinary VCR.

Sponsorships, billboards and community service announcements are commonly used terminology in the Media industry and represent different forms of electronic commercials. The word "billboard", in this context, is a form of sponsorship commercial that appears on TV."

Providing Information in Formats that meet Communication Requirements of People with Disabilities.

Information in alternative formats should be provided on request from a person with a disability. Information can usually be provided in alternative formats for little or no additional cost to the provider (See Appendix 2).

The most appropriate alternative format can vary according to an individual's specific communication requirements and can include use of:

- the Internet website;
- e-mail;
- computer disk;
- audio cassette;
- large print text;
- 990RPH Information Radio (radio for the print handicapped);
- audio loops (with appropriate signage) that are fitted for public meetings and events where public address systems are used;
- captioning of any videos or films, including advertisements, produced by the Department;
- AUSLAN (sign language) interpreting service;
- a Telephone Typewriter (TTY) or the ACE telephone interpreting service; and
- Braille format, if requested.

State Government departments should publicise that their information is available in alternative formats on request from a person with a disability on:

- documents with a statement that reads, "This publication is available in alternative formats such as computer disc, audiotape or Braille, on request from a person with a disability", or words to that effect; and
- to the community, through initiatives such as:
 - newsletters / publications;
 - community newspapers;
 - Information Radio;
 - TV announcements with captions for people with a hearing impairment;
 - notices where public documents are displayed in libraries and other facilities; and
 - informing disability agencies and disability support organisations.