**Submission to the 2018 Review of the Australian Public Service from blind and vision impaired people working in the Australian Public Service**

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# Introduction

As a group of blind and vision impaired persons working in the Australian Public Service (APS) we write this joint submission with the view to inform practice and attitudes for the continued employment and representation of disability in the APS that reflects our Australian society. We welcome this independent review that is to ensure the APS is fit-for-purpose for the coming decade. In that the APS must have the capability to meet core responsibilities and deliver functions, and to understand and deploy technology and data to drive improvement – we believe learnings to facilitate universal design capability will bring a more agile, innovative and efficient APS. This then represents both inward and outward facing policy and implementation through coherent, collaborative, whole of government and community approaches.

This is our narrative on the current set of challenges we perceive are faced by people with disability working in the APS. We feel it necessary to highlight our stories to show that what we experience is not isolated but mostly preventable. We all know other blind and vision impaired persons with more stories who are no longer employed or are too scared to be involved in a reference group.

We are disappointed to see the decline in numbers of those who chose to disclose/share they have a disability. We are disappointed to see time again our colleagues leave the public service because they say a major contributing factor being the lack of inclusion and accessibility. Or, being encouraged to leave because the culture does not want them in the workplace. Or, being medically retired for the same disability they had when first engaged. We believe our Parliamentarians, the Australian people, the Australian Government and the people working in the APS want us to be able to demonstrate capability free from unnecessary barriers. We believe we have the ability to respond and support better resilience of APS staff to embrace innovation, change and creativity in workplace leadership and practice.

The APS has taken steps to improve disability employment yet disability employment in the APS over the last five years has declined[[1]](#footnote-1). Let us, the people of disability be the driver from the ground up for the APS on what needs to change and how things can be improved.

We feel the major contributing factor is the lack of robust design phase planning, insufficiently targeted implementation and lack of monitoring and remediation to embed legal and policy accessibility requirements. In a time where universal design principles in our built and electronic environments such as digitisation and electronic communication are here to support all people, failures in government processes are creating disability[[2]](#footnote-2). We are literally being ‘shut out’. Given the bipartisan government policy to transition people from welfare to the workforce, the APS culture needs to take a look at its own role if it is to be representative of the Australian people. The APS has the legal obligation and moral imperative to ensure it gets this right.

As a supporting note, an enduring theme from the optimisation of universal design, access, inclusion, participation, workplace flexibility and adjustments is that these measures benefit everyone. Not just those of disability and diversity.

# Who are we?

This submission is a collaboration of a group of blind and vision impaired people working in the Australian Public Service (APS). The group is an informal collaboration of individuals with current members working in the APS for 1 to 20 years at the APS3 level to the EL2 level. Most members joined the APS through the Graduate Program. The group commenced in 2014 as a reference group to the Australian Public Service Commission’s Disability Champions program. It evolves as members come and go. Group members may not agree on all points but do have the common goal of sharing lived experience so as to help each other and to see improvements in accessibility and inclusion of people with disability in the Australian Public Service.

In consultation with the Digital Transformation Agency (DTA) and Vision Australia, some members of our group have chosen to contribute our unique talents to drive innovation and inclusion in the APS and for the Australian people with the establishment of a Disability Advisory Group to the DTA on being part of the narrative to access and inclusion.

# Our stories

Diversity and disability are part of the narrative of working in government and working for government and being supported by government – because we are represented in the community. For the APS to best serve the Australian government and people it must lead by example by demonstrating how diversity and disability are part of the narrative in providing security, driving productivity and jobs in the economy, improving citizens’ experience of government, and delivering fair and equitable support where it is most needed. Representation matters, yet with the decline of disability employment in the APS this position needs a boost. We hope our stories can highlight areas where change is needed.

These are statements from some of our members as anecdotal evidence of the lived experience of people with vision impairment working in the Australian Public Service (APS). Our stories are not dissimilar to those shared by all PWD working in the APS and as documented in the report: *Doing it differently: Staff Perceptions of the Barriers to Workplace Participation experienced by Public Servants with Disability working in the Australian Public Service*.[[3]](#footnote-3)

## Perception of attitudes toward disability access

* “I feel intersectionality which includes disability impacts disproportionally. For example, of those people who are blind and vision impaired who are promoted and occupy higher level positions, I know only one woman at the (Executive Level) EL1 or beyond, all the rest are male. Further they all seem to be white Anglo males who are not indigenous or culturally diverse. The only woman I know of who is an EL2 was at a high level before she lost her eyesight so did not experience the barriers on the outset. Also, being almost blind it is seen by others that she must use the assistive technology. And of the men at EL1 and above level, those who are blind use AT (Assistive Technology) yet those who are legally blind and better do not use AT so there seems to be culture that low vision people must not use AT to progress in their career”.
* “In organising my reasonable adjustments it was a weird process because the department policy on the role of the supervisor meant the employee with disability had little control or choice or direct action”.
* “Whilst the access and inclusion issues are difficult for us all, it seems that that those who ‘appear’ not to have a disability that is ‘visible’ are judged differently to those whom it is obvious. For example, a blind person with no vision it is seen ‘essential’ that they cannot operate without assistive technology. However, a person with vision impairment who may be able to ride a pushbike is considered that their need for assistive technology (AT) is a choice. This is discriminatory representing an ablest culture”.
* “As an example, the day I arrived at my new workplace a workplace assessment by an occupational therapist (OT) was arranged for me, without my knowledge or consent. I had already advised the employer of my reasonable adjustment needs at time of interview, some of which they claim to not be able to meet for technical reasons. The OT wrote a report and at the time of assessment affirmed the same needs I had already provided. From my view the assessment was a waste of time and taxpayer money because I know my adjustment needs. It is unnecessary that we have to go through a workplace assessment where our condition is non-progressive. Despite this assessment the department paid for, the Branch Head of the ICT (Information and Communication Technology) department refused to install my assistive technology telling my Branch Head that it was my want, not my need. My Branch Head agreed with the head of ICT. This created an ongoing situation of disadvantage for me. Staff in my area heard the discussions on management non-approval of my disability needs. This led to bullying, harassment and adverse action against me. There were also ongoing conversations around me about how better off I would be to take up a voluntary redundancy, to be medically retired or to go do my own thing in my own time in a business by myself”.
* “I am glare sensitive, when my supervisor went on long service leave another manager forced everyone to move desks because they wanted the corner window seat and for their graduate to sit next to them which was my supervisor’s seat. This meant myself and my supervisor had to move. The new seating resulted in more glare and a request that I close the windows. The manager made passive aggressive comments that they are blind and can’t see outside, it is such a lovely day but the blinds are closed. I have been working the public service for nine years and my needs have not changed. Yet instead of trying to accommodate me and move me back, they made me the problem. After raising the issue my Director said being an introvert I am easily offended, that they need to get someone in to test the glare, to test me. This could have been resolved if I put back to my original seat. But the manager did not want to give up their corner window seat and this was accepted as appropriate over my access needs. Further, as I move to other areas in the department and moved departments the same issue followed me. People would complain if I shut the blinds saying my disability is interfering with them. But when others without disability closed the blinds people did not complain. I did not close the blinds disproportionally to others. But because I am known to be glare sensitive the culture is to use that to say they are being disadvantaged. I have continued to fight against these negative attitudes as it is not just disability but some people in general sometimes need to shut out the glare”.
* “I have been an EL1 for eight years, acted as a Director and always received a meet expectations rating. I have now chosen to drop down to an APS6 for my health after the two years of progressively increasing intolerant and passive aggressive behaviour from some staff and managers at my previous workplace - all documented. The behaviour started following a change in senior management and move to a new building. I am glare sensitive and coloured blind. I was blinded by the light immediately walking into the office and tried to avoid the kitchen as much as possible. I often crouched behind my monitor to try to avoid the direct glare and wore sunglasses at my desk at times when I was too exhausted to ask my work colleagues to again put down the blinds. The Disability Champion suggested I use a laptop in one of the meeting rooms to get work done where this was urgent. None of the laptops had my assistive technology installed. I felt threaten after being told that if my performance did not improve I would be sent for a medical assessment. I was so demoralised after two years of focus on my disability that I escaped to a lower level job to rebuild my life”.
* In reference to attendance their attendance at the launch in 2016 of the report by ‘*Doing it differently: Staff Perceptions of the Barriers to Workplace Participation experienced by Public Servants with Disability working in the Australian Public Service*’ “…a women sitting at the front row turned around to tell the audience that they are just about to release a system they built as an APS wide essential system that they now know cannot be used by blind and vision impaired people because they did not consult that group. I was gobsmacked! This is bad on so many levels. Firstly, yeah sure they did not consult a subsection of their end users in the design planning stage nor testing stage. Secondly, why are they not following legal/policy requirements and not building with WCAG in mind. Thirdly, all these people keep saying it is blind and vision impaired persons and then use numbers to presume we are a small group, which is not true, we represent around half of the disability population. But the main point is that it is not just our group affected by this lack of consideration but also other users of assistive technology and other disability types. Lastly, they do not understand that they are also shutting out their own SES officers who may want to use the systems on their mobile phones and other portable devices. They need to understand that this stuff helps everyone.”
* “Yes I do raise access barriers and have lodged feedback and complaints. They don’t like whistle blowers but I wouldn’t have to raise complaints and be seen as a whistle blower if they were doing it right! At times I have subject to retaliation action and it seems some take it personally and they think that by me asking that they do it a way I can see that this means they are missing out on choice and their own freedom. For them its about choice, for me it’s the difference between doing my job or not.”
* “When joining these employment programs such as the IAGDP, there should be better testing of systems so they know jobs you are best suited to do. I am sure I would have submitted my resume and that would have outlined my career background. I should have been consulted. The decision was to place me in a Disability Employment Services team as I had a disability. A terrible stereotype as it was assumed without consulting me.”
* “I do hope to see an improvement with these various employment programs for the APS so that others who are blind/vision impaired  will not experience the lack of support I did while doing my IAGDP.”

##  Technology issues

* “Working in different departments / portfolios and serving various Ministers and Parliamentary Secretaries, it seems the information that comes from their office and loaded onto the parliamentary systems are not always accessible. One department none of the documents were accessible as they were scanned in by the Minister’s staff as an image document. I raised this as my screen reader could not read the document. I was quickly shut down and not given anymore work from that system.”
* “I am totally blind and am doing a second stint in the APS. I rejoined the APS with the Indigenous Australian Government Development Program (IAGDP) in 2012. I had four supervisors in six months which made things very difficult. Due to my screen reader not being compatible with the Employment Support System (ESS) and PDMS systems, it took time to work out what tasks I could undertake. Originally I did not have a thorough work site assessment as they did not know what I would being doing and they felt I was limited which is correct to a degree when systems are not accessible.”
* “The installation of my assistive technology (AT) Zoomtext Magnifier and Screen Reader took some time on my normal and even longer on my secret PC. I was told they cannot install it onto my secret PC due to security concerns. Further, when it was determined it could be installed, the area insisted I have a workplace assessment conducted (even though I already had it on my normal PC) and also want details of my medical condition and visual acuity so ‘they’ can determine what function ‘they’ thought I needed. Totally illegal as they have no reason to ask for my condition details and I only want to give them advice on my barriers”.
* “The department migrated assistive technology users first from the old operating system to the new. This meant they had not ironed out the issues first. It meant the IT did not work for the network in general and with the assistive technology. I had months of no functioning IT. Also they refused to roll back my PC. Users of AT should only be migrated after the mainstream matters are sorted out and the transition area has also thoroughly tested the ICT with the AT”.
* “The Optical Character Recognition (OCR) reader for Adobe is switched off as a network policy but this also stops the OCR feature for screen readers like JAWS, making it impossible to understand scanned documents sent internally. Easily fixed with MFDs with OCR as long as agencies are willing to pay extra for this feature. Another example is opening all PDF in the browser which then locks out screen reader software or failure to install a refreshable braille display on a desktop PC for ‘security reasons”.
* “Agencies are using security features in applications like MS Word that lock out assistive technology users. They are not doing evidence based risk assessments to determine if the features we need are okay to use”.
* “There seems to be no consistent application or understanding on how to install and test AT across departments. This leads to inconsistent access and affects the PWD ability to perform at the new organisation”.
* “February 2018 there is still no resolution that all AT users cannot use the departmental webforms in PDF. And the departments forms for everything is done through PDF webforms e.g. flex sheets, performance agreements, purchasing forms, training forms, HR pay forms and leave requests that are ad hoc. There is no reasonable adjustment process organized for these”.
* “Media monitors delivered to every agency use to be accessible and now I cannot read them with my screen reader. People have suggested that I can simply log onto the online system and read them myself. Well thank you! So my colleagues all get one email sent to them with a link or attachments of articles are that are selected for our branch – easy peasy. But because I use assistive technology and the PDF documents has not been set up to accommodate my technology where they should, I am forced to do the long work around to go the website, log in, do my own search and then compare what articles my colleagues have and get those and then read. How is that fair!”.
* “Towards the end of 2017 my team moved to a new building. I was left behind due to the difficulties ‘perceived’ around moving my assistive technology and the perception of poor networks and access in that building. Through my own efforts I moved there after five months of pushing. I experienced barriers with IT staff, Facilities staff not coming together to meet with me to talk about the move and how to get it done. Further, Facilities staff insisted I have a workplace assessment done because I wanted a partition to cut the glare. I found a board on wheels and put it next to my desk – that solved my glare issue. In the five months I was away from my team I missed meetings, in-house discourse and learning and social integration.”
* “I am not able to participate in hot-desking as needed by my role description or to use a meeting room PC with AT to do presentations because the department has not been able to resolve the IT issue to allow me to have a roaming profile”.
* “I was scheduled to undertake a day of PC training and requested IT to load my AT in the training room. But I was told due to office politics it was not done so I had no AT to participate and had to rely on the teacher and class to help me through the day”.
* “Delays in my ability to do my job due to PC not working properly or at all. This impacts on the team’s ability to meet deadlines. It also impacts on what tasks will be allocated to me. My former supervisor then had low expectations on what she thinks I can do. In this (supported by department policy on the supervisor’s role of PWD) my supervisor determines without my consultation what they think I can and cannot do. I could not be given strategic work that is time sensitive. This situation also impacted on my ability to quickly acquire the knowledge for the job I could not do higher level work quickly at that time either. For example, all of the systems require security level and need to know access but can only be accessed by the same systems that conflict with Zoomtext. There was no access allowed by other systems e.g. IPad so documents could be transferred to other systems that may not be conflicting with AT or other access devices”.
* “I was told to set up at home using a out of office token. This was even after IT confirmed to me that this would not solve the issues. Further, staff advised me it was stated that I was not doing my job and this affected how others perceived me”.
* “The physical and attitude barriers impacted negatively on the relationship with my former supervisor. I am aware advice was sought through Human Resources Services Business Partner. In one meeting I was advised to lodge an incident report to see where it goes. Meetings were set up on my behalf for early intervention and to discuss my health and safety given my AT was not working. On all occasions I reiterated these processes were not necessary or wanted, I do not require referral to psychological assessment, rather, I want my reasonable adjustments working”.
* “There seems to be this move for everyone to go to JAWS, even if the PWD have chosen not to use JAWS. This is because JAWS is generally considered used by keyboard users and others such as Zoomtext by those who can use a mouse to navigate. I can understand departments want to minimise the use of external software on their DASL (department accepted software list) but they are forcing us and not considering the impact of learning a new skill to change AT”.
* “During my first stint in the APS, I did work at the APS4 and 5 levels. I know I am capable of achieving consistent outcomes as I have since then with my performance agreements. I make sure my supervisors understand that my outcomes are sometimes impacted on by the impact a screen reader can have on my work or the lack of accessibility to programs I need to use to carry out the task. Annoyingly some IT staff do not understand that all blind/vision impaired people do not use the same screen reader programs. They try to make you feel you should be using Jaws as it is the most popular screen reader program. Interestingly Jaws cannot access these software programs so it is not just the previous screen reader Windoweyes that I used that could not access some programs. I had to ask another colleague who used Jaws to tell me how he was able to get help to do his work. After he explained this, I was able to get work arounds to help me complete the task.”

## Recruitment

* “My recent experience I believe I was discounted from moving to the next stage in a recruitment process because: a) I requested to be part of the RecruitAbility scheme, and b) the recruitment company didn’t know if their online assessment tool for the next stage of the application process was accessible. This happened when I applied for a job at the APS6 while I was an EL1 at the time. My application was clearly impressive but during a phone conversation with the recruitment company they asked me three times if I was sure I wanted to be included in the RecutAbility scheme and couldn’t tell me if their online testing tool was accessible. They also couldn’t understand why I might need a little more time to complete the task. One week later I received an email to advise my application did not progress to the next stage. I didn’t follow up. I figured if that central agency really wanted PWD in their workforce they would have ensured the recruitment company understood the RecruitAbility scheme”.
* “I contributed to a project here about issues around RecruitAbility not seen to be understood or implemented along with how RA are addressed for onboarding. As an example, outcomes of a recent RA project sought to put in place questions for panel members to ask at interview stage about what reasonable adjustments would be needed if they got the job. I pointed out that whilst they may ask that question at such time, in my view the time to be asking is only when a candidate is offered the job. This would mitigate perceptual bias towards panel members at interview as there is no reason for them to ask at that time that would benefit the process. And could open the process up to claims of discrimination should the PWD who requires RA talks to those at interview and then believes they did not get the job because they were ‘forced’ to answer questions about RA (we all have a right to privacy, share only what we want to share and that only needs to be about the barriers and RA to support). Sure, there are many PWD whom there is no mistaking RA will be perceived to be required but many others don’t want to talk about that unless they are offered the job or choose not to use RA adjustments at all – even if they identify as a PWD or not”.
* “Interestingly, I asked about a portable version of Zoomtext some time ago, particularly when I travelled to a lot of our regional offices. This was a particular challenge, and since then I’ve used thick clients wherever I’ve gone. I’d be concerned with anyone not getting a job because of a hot desking environment. This is a clear act of discrimination, however, it also wouldn’t be the first time a panel chair possibly hasn’t provided honest feedback to the candidate. If the process was for an APS6 position or below, the outcome can be challenged and appealed. I’ve been quite vocal with our recruitment team about the lack of information provided to panel chairs about the RecruitAbility scheme and workplace adjustments that could be incorporated into both the recruitment process and the workplace more broadly”.
* “My recruitment discrimination moment was with a Department in Barton. Their application process was online written application, online testing and then online interview. Got to the online interview only to discover that it requires you to be able to read the question and see the video playback at the same time which I was unable to do because Zooming in I can only see one and not the other. I talked to the recruitment team who said just to try it and was not given any other options. So, I spent my allocated time reading the question back, while trying to prepare my response and that could be seen on the playback. One of the panel members in their written feedback actually said I spent too much time reading the question and noted my comment ‘I am vision impaired and having difficulty reading the question’. It took over one year to get a copy of my videos from the interview. The contracted company who managed the videos refused to give me copies saying their privacy policy doesn’t allow it. The department tried all stalling techniques saying they wanted to meet with me, tell them why I needed etc. They were stalling to ensure the one year had past to prevent a DDA complaint being successful. Another person I know who works there now told me they have scrapped that system due to this issue, that I should have been given a face to face interview and that I am legally entitled to my personal records – and offered to follow-up for me. However my next efforts resulted in getting my videos”.

## Performance management and promotion

* “I recently read some of my HR review conducted a few years ago. I know this is history but it certainly has impacted on my career in the APS. I just couldn’t bring myself to read the details supporting their arguments saying I was not capable of working at the 4 level, but now am able to bring myself to read it. I did read the recommendations though and they did acknowledge it was a wrong job match but nothing was done to support me which I believe should have been their responsibility given the issues involved. The EL1 caring out the review had no idea of AT. She solely went on what others told her and they too got it wrong. They said AT Windoweyes was a free program. They said that Jaws was the preferred screen reader program with the department. This made me look like I was the one causing inaccessibility issues due to my choice of screen readers. Little did they know that others using Jaws experienced inaccessibility with various databases just like I did with Windoweyes”.
* “Because of the issues around the department refusing to install my AT and related matters, my Director seemed tasked with demonstrating to the best of her ability that I was not performing my role. When I questioned why it was her and not my EL supervisor taking me into meetings to talk about my performance, that stopped and my EL then gave her performance advice. But this was only what was in writing and she refused to consider my perspective. They made up stories and used those to distort my true performance”.
* “There seems to be this weird thing going on where supervisors share notes when I move from one job to another. They are not good notes, they are notes of things they repeat where they think they will get a negative emotional response from me. They are also notes on how things have been dealt with through my performance cycle where they use information in a way to distort my true performance. It seems like they are building a case overtime that will eventually lead to exit of the public service. I know they do not like that I raise access issues even though it is those issues that affect my performance”.
* “My agency was on the front foot by implementing WCAG 2.0 AA across its platforms including the intranet and internet. However after the launch an SES officer took a personal dislike to the colour scheme and requested it be changed. This resulted in the pages no longer meeting the colour contrast requirements for WCAG and made it very difficult for me to read the content and not at all in some places. I raised the issue with IT but was told it was approved by SES and will not be changed. I had to push to assert they comply which they finally changed it back. It was put to me that I was questioning authority. However I said I am only asking for the department to meet its legal obligations and support diversity in the workplace. I think they see me as a trouble maker”.
* “Training providers also used for the employment programs should know their responsibilities in making course materials accessible to blind and vision impaired people. When one is studying and trying to progress with their career in the APS, it is not the appropriate time to spend time supporting the training providers during this busy and stressful time.”

# What we think needs to change

For a modern APS to be an employer of choice, providing enriching work for its employees, nurturing talent and being an exemplar of innovation and adaptability – it must be representative of its community which means diversity that includes disability are part of that narrative of success working in the APS. This representation will mean the APS is more aligned to its community therefore improving citizens’ experience of government and delivering fair outcomes for them. We further believe that this representation will support the APS to tackle complex, multi-sectoral challenges in collaboration with the community, business and citizens.

Vision 2020 Australia’s position on employment states “Access to meaningful employment free from discrimination is a fundamental human right of all Australians and is essential for building a prosperous and egalitarian society. Meaningful employment is integral to an individual’s ability to remain independent, empowered and connected with their community, and to maximise opportunities for participation in all aspects of daily life.” [[4]](#footnote-4)

It goes on to state that “While the Australian Public Service (APS) is a major employer across Australia, there has been a consistent decline in the inclusion of people who identify as having a disability in the APS workforce, from 6.6 per cent in 1996 down to 4.1 per cent in 2005 to 3.74 per cent in 2016.”[[5]](#footnote-5)

Senator Jordan Steele-John has stated "That level has actually decreased in the last five years and it's no bloody surprise if people can't get around the place." In 2017, just 3.6 per cent of the public service identified as having a disability, and while this is the same ratio as in 2007, the number of employees who identify as having a disability has dropped. In 2007, 5602 employees had a disability, while in 2017 that figure was 5486. A policy to increase the number of public service employees with a disability was introduced first in 2012, and the updated As One: Making It Happen strategy was released in 2016. While the strategy committed to increase the number of employees in the public service with a disability, it didn't implement a target or quota.”[[6]](#footnote-6)

We do not want to continue to be shut out. We would like to see the APS more representative of the diversity and disability of the Australian people. From the ground up, here are some recommendations of implementation and change management strategies that we believe will see the APS as an exemplar of adaption and innovation which in turn will attract and retain professionals and talent of diversity and disability.

## Active adoption, monitoring and remediation of Universal Design

We feel the major contributing factor to the decline in disability employment in the APS is the lack of robust design phase planning, insufficiently targeted implementation and lack of monitoring and remediation to embed legal and policy accessibility requirements. Here are some ideas on universal design:

* Access and inclusion through universal design benefits everyone, not just those with injury and/or disability. ‘Accessibility isn’t just about wheelchairs or screen readers. Accessibility is about optimising the experience to include as many people as possible.’[[7]](#footnote-7) “Accessibility is just the beginning. It is usability that makes the difference.” “Content is what your user needs or wants right now. Design is how you deliver it” Strategic business benefits: Increase revenue, Decrease costs, Increase new business, Increase existing business, Increase shareholder value.[[8]](#footnote-8).
* “It is impossible to design something that is a perfect fit for the entire population, but inclusive design researches the target market and provides an appropriate response to address the diversity in this target population.[[9]](#footnote-9)” “Designing an inclusive environment does not mean focusing on physical differences alone; rather there has to be an equal emphasis on different styles of working as well as on mental health. It is also important to consider that some employers might be sensitive to noise, light and air pollutants.” We support work settings that support diverse working needs.
* The APS can benefit from accessibility for all staff and all external users because its application means easier use for those using mobile devices and improve search functions. This can be of benefit to APS leaders for example who travel a lot and rely on their phone or tablet device to do business whether emails, using PDMS, intranet or internet. It is also good business sense for APS customers using the internet.
* There is a strong business case for accessibility. Accessibility overlaps with other best practices such as mobile web design, device independence, multi-modal interaction, usability, design for older users, and search engine optimization. Accessible websites can have better search results, reduced maintenance costs, increased audience reach, and demonstrate corporate social responsibility[[10]](#footnote-10).
* APS can maintain employment of People with Injury and Disability along with their skills, experience, and corporate knowledge. This includes those who were employed with their disability, those who have acquired disability or injury at or outside work. It can also include members of the Australian Defence Force with acquired injury or disability in the course of their duty to transition to the APS where their expertise may add value.
* As more people with disability enter the workforce and as more platforms are digitised people will continue to demand accessibility is met – including for every person using mobile devices. It makes good business sense to be on the front foot of better practice, not just compliance and to avoid being forced to comply. In the US there seems to be an increase in lawsuits in this area[[11]](#footnote-11).
* Design with inclusion in mind. Consider accessibility hand in hand with inclusive design principles[[12]](#footnote-12). This means from the outset of the procurement and/or development process to have on-board experts in the design of accessibility and user experience. For example, people who know about and can design with consideration to WCAG 2.0 AA, the ICT Accessibility Procurement Australian Standard and assistive technology.
* Diagram of the cost of not embedding accessibility. It is far better to start at design phase for universal design and accessibility than to retrofit:



[image: diagram of the exponential cost of not embedding accessibility] “Numbers say that cost of re-work for a final products is extremely high”[[13]](#footnote-13)

## Assume and show representation of people with disability

* As recommended at a recent conference by the Australian Network on Disability, agencies should as a general rule assume that 10% of their workplace is with disability – despite what the numbers might say[[14]](#footnote-14). We support this notion and would go further to state that the APS being representative of the people should adopt a policy to assume that one in five of their workforce is a person with disability or a mental health condition. Representation matters, not the numbers. By assuming diversity is present and planning and implementing, people of diversity can come and go as people.
* That Senior Leaders support representation from people with disability in committees and processes that affect people with disability. For example, this could be through a disability Network where matters are consulted through their executive forum. It could mean representation on the Staff Consultative Forum, on forums to do with ICT procurement and universal design.
* That Senior Leaders across APS support their staff with disability to nominate and participate in the Disability Accessibility Working Group for people with disability that is currently being established by the Digital Transformation Agency.
* That the APS support formal and informal collaboration of people with disability to allow them to share experience and support each other in the APS. Such forums also provide opportunities for mentoring. An example of an informal collaboration of our BVI Reference Group. An example of a formal collaboration is the Disability Leadership Institute[[15]](#footnote-15).

## APS and agency coordinated implementation

* A central area within APS and each department put into plain English policy and implementation of better practice for accessibility, including standards in our build environment and accessible ICT procurement, reasonable adjustments and universal design. In addition, legal and policy requirements and ensure those are embedded in agency business. Further, that they are monitored and deficiencies addressed. We believe concentration on universal design and design inclusion will make people more comfortable about sharing their diversity barriers, it will create safe places that are already accommodated. This means less emphasises on individuals through reasonable adjustments.
* That the APS put in place an ICT Assistive Technology Accessibility Hub as an APS all agency wide resource. Until recently, there was pubic reference on the Australian Public Service Commission (APSC) website of services provided by the Department of Human Services for an Accessibility Hub. Since around 2015 that service had provided information support to some agencies around ICT compatibility with assistive technology. IT staff from other agencies could visit or liaise with the Hub staff to supporting learning for ICT assistive technology. That support seems to no longer exist. Our reference group members have come across barriers in the form of senior staff suggesting that their small agency does not have the resources to support accessibility for assistive technology. Such a Hub may allow resources and knowledge sharing.
* That the matter of security concerns for assistive technology use is appropriately addressed in an evidence base manner and applied consistently across all agencies. The goal to avoid assistive technology users being denied access to employment and systems to do their job.
* That the APS addresses the issues raised in the Australian Human Rights Commission 2015 paper on the ICT accessibility issue preventing meaningful employment of PWD. For example, the paper talks to issues and solutions that could be considered for the APS[[16]](#footnote-16) such as using JobAccess for scripting to allow screen readers to read and give access to electronic record management systems that are currently not accessible.
* That all future developed APS wide electronic platforms and each agency platform such as record management systems and eLearning courses and those being upgraded meet DTA’s content guide including WCAG 2.1.
* That users of assistive technology are not used as test subjects without consent when systems are upgraded and tested. That there are appropriately qualified and experienced staff who know about assistive technology to ensure testing is done prior to the roll out.
* That APS and agency staff are educated on the DTA’s content guide. The APS must acquire and maintain the necessary skills and expertise to fulfil its responsibilities. Because “Accessibility is everyone’s responsibility”. This includes WCAG 2.0: 12 Guidelines & 61 Criteria (Perceivable, Operable, Understandable, and Robust). Also consider: WCAG 2.1: 17 more criteria to cover new digital tools and understanding (Mobile, Low Vision, and Cognitive). Further that there is practical advice for all content developers for internet, intranet and all staff communications. This is not just the web team staff, but all staff who develop content to be put into staff communications, intranets and internet. This would be a similar practice to applying Ministerial guidelines to documents for the Ministers office.
* Develop a policy and implementation plan, monitoring and remediation for the ICT Accessibility Procurement Australian Standard[[17]](#footnote-17).
* Bring on-board an accessibility expert to run a project for each agency of APS to determine accessibility shortfalls and ways to design for inclusion. There could be a periodic compliance and monitoring program run for the internet, intranet and all staff communications. Whilst leadership may direct that WCAG and accessibility is met, sometimes in practice and implementation things do not always match, so staff need ongoing training and checks and balances to support leadership direction. As an example, this article shows that whilst leadership states they wanted My Health Record to match WCAG 2.0 AA, in practice the issues identified in this article show that in some places WCAG 2.0 A was not achieved, thus showing a shortfall in accessible outcomes. Here the APS did not allow blind users to opt out online[[18]](#footnote-18).
* That assistive technology licences are purchased as multi-user licences to support the use of more users of assistive technology.
* IT departments in consultation with disability groups and disability networks in each agency look at a project for alternatives to access information rather than the traditional computer. Tools to allow access to intranet and internet and documents (including classified documents for those people disability who hold the appropriate classification and have a need to know) such as IPADs or other devices so people with barriers have alternatives. This may prove innovative on the way we do business.
* On this note, there does not seem to be evidence that any agency has taken up implementing provision of information as allowed through the Marrakesh Treaty as an alternative format to text[[19]](#footnote-19).

## Flexibility in working arrangements is normalised

This means everyone has access to flexible working arrangements. Flexibility means that arrangements are individual to the person and can change over time. We all want to come to work and contribute to the best of our capability, this might mean how it is done can vary. Here are some ideas:

* We feel there is a need to change on the homogeneous view of success and career. As people with disability we may not be able to work full-time but that does not mean that we are not ambitious and want and deserve special projects or success. It just means it might look different and that is okay. Organisations need to acknowledge where the person with disability is at and work with them at that level. “My condition means I have a less narrow view of work and success and ambition.”[[20]](#footnote-20)
* We support mandatory training for all staff in unconscious bias, diversity and disability. Such training and supporting processes of diversity in work practices means a universal application where the focus is not just on that person who is different[[21]](#footnote-21). It supports open flexibility for all workers. Its okay to start early or late if the job role does not require manning a help desk or similar. Its okay work part time, to job share, to work from home. Its okay to share different practices on how we conduct business – you might print out a paper proof read, I will use my screen reader or peer review.

## Implement the measures recommended by disability groups

We support Vision 2020 Australia’s package of measures[[22]](#footnote-22):

1. Implement an overall target of seven per cent for people who identify as having a disability, including people who are blind or vision impaired, employed in the APS workforce to be achieved within five years (2018-2023).
2. Implement an APS disability internship initiative.
3. Ensure the RecruitAbility scheme is mandatory across all APS agencies and levels.
4. Ensure recruitment processes and information, communication and technology (ICT) policies facilitate accessibility for people with a disability.

We also support a more robust system for RecruitAbility. Whilst Vision2020’s position statement points to the RecruitAbility scheme as a way forward to improve access to employment for people with disability, our group’s experience is that the scheme if not only not adopted by agencies, but where the agencies have adopted the scheme there seems to be little to nothing on implementation or understanding for recruitment panels, including recruitment companies. Further, this has resulted in exclusion and discrimination where our members have opted into the scheme. We feel this should also apply to people employed as contractors through the procurement processes; which seem to bypass the recruitment processes.

We also concur with the joint statement of disability groups that “…details how procuring accessible ICT can help increase the disability employment rate within the APS, and urges for the [Australian Standard on ICT accessibility](https://www.finance.gov.au/blog/2016/09/09/Accessibility-ICT-Procurement-Standard/) to be enforced, promoted and monitored within the APS.”[[23]](#footnote-23)

# What success might look like

This is a collection on what the APS might look like if it were achieving success as an employer of inclusion for blind and vision impaired people:

* Universal design applied in all agencies equally means I can move around the APS with the same expectations and do not encounter access barriers that were resolved at other departments
* The APS and my agency cares about access and inclusion because there is an APS wide policy, implementation along with monitoring and remediation for its legal and policy requirements in this area. Including WCAG, ICT accessible procurement and accessible built environment
* I can access all of the information I need to do my job
* I have the tools necessary to access information to do my job such as access to alternative formats to print or devices that will read print
* I can do online training and attend training courses with the same access to information and learning as colleagues without disability
* I see people of diversity, culture, gender, disability and intersectionality at all levels within the APS
* I and others feel safe to share disability barriers
* Colleagues who set up meetings who want input to documents send the documents to attendees with enough time to read prior and consider
* Supervisors do not make judgements on what I can and cannot do based on their view of disability. Instead, they talk to me about the job to be done so I can advise of any access barriers
* I have control and choice over my decisions around reasonable adjustments and my disability barriers in the workplace
* Colleagues see my person, not my disability and engage with me as a person on our commonalities
* The application of universal design everywhere means there is less need for reasonable adjustments for individuals
* I don’t have to send documents back to my colleagues to ask that instead of putting your changes in red, that they use track changes, or change their comments to high contrast – they apply universal design
* When receiving staff emails, if there are images, there is alternative text
* I can read the daily Media Monitors
* I can raise access concerns and not be subject to adverse action, rather, the matters are treated as business as usual worked into remediation
* There are spaces in the workplace for all sorts of working styles and practices and people can move and work in different spaces whether they want to sit together in a break out group or closed off to the world, sit in the sunlight or sit in the dark, sit at a desk or stand or sit or lie on the floor or work from home or work from the park
* Information can be access and is readable by portable devices including classified material in the office or at home. This includes access to PDMS and all documents that are uploaded from Minister’s offices
* All staff every year (including contractors) do mandatory training on diversity, our First Peoples, disability and unconscious bias
* Diversity is just who we are, there is no focus on the person’s diversity identity, the focus is on the business we do, our mates and family and social engagement
* Disability employment is about participation and inclusion. It is not about us being a risk to the organisation that requires managing through Work, Health and Safety management, or Early Intervention or Case Management, or Risk Managed. If the organisation needs to employ these measures then the organisation needs to look at itself as the problem by not designing for everyone, not including everyone and not monitoring its own legal and policy obligations
* When I apply for a job I choose whether or not I want or need reasonable adjustments based on the information given about the process
* When I start a new job I chose whether or not I want to disclose my disability or diversity and whether or not I will require a workplace assessment and am consulted on that process
* When I move from job to job or department to department my reasonable adjustments come with me and/or the implemented at my new job based on my decision of what is needed or my decision on whether a workplace assessment is required
* My assistive technology works with my agency’s systems and there is no issue with mobility if I want to change a job role within the department or move departments.
1. <https://www.smh.com.au/national/act/greens-senator-jordon-steelejohn-calls-for-more-public-servants-with-disabilities-20180312-h0xccu.html> [↑](#footnote-ref-1)
2. <https://www.theguardian.com/australia-news/2018/jul/25/my-health-record-website-wont-let-blind-users-opt-out>: https://www.humanrights.gov.au/sites/default/files/document/publication/Accessible%20ICT\_Paper2015\_AHRC.pdf : <https://www.humanrights.gov.au/publications/issues-paper-employment-discrimination-against-australians-disability/9-barriers>: <https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/shut-out-the-experience-of-people-with-disabilities-and-their-families-in-australia?HTML> [↑](#footnote-ref-2)
3. *Doing it differently: Staff Perceptions of the Barriers to Workplace Participation experienced by Public Servants with Disability working in the Australian Public Service*. November 2016. Institute for Governance and Policy Analysis. <http://www.governanceinstitute.edu.au/magma/media/upload/ckeditor/files/online-%20disability%20report.pdf> [↑](#footnote-ref-3)
4. Vision2020’s “Position statement on meaningful employment for people with disability in the Australian Public Service” October 2017 at: <http://www.vision2020australia.org.au/uploads/resource/248/Position-Statement-on-Meaningful-Employment-January-2018.pdf> [↑](#footnote-ref-4)
5. Vision2020’s “Position statement on meaningful employment for people with disability in the Australian Public Service” October 2017 at: <http://www.vision2020australia.org.au/uploads/resource/248/Position-Statement-on-Meaningful-Employment-January-2018.pdf> [↑](#footnote-ref-5)
6. <https://www.smh.com.au/national/act/greens-senator-jordon-steelejohn-calls-for-more-public-servants-with-disabilities-20180312-h0xccu.html> [↑](#footnote-ref-6)
7. <http://laurakalbag.com/accessibility-en-france/> [↑](#footnote-ref-7)
8. [www.uie.com](http://www.uie.com) [↑](#footnote-ref-8)
9. <https://www.forbes.com/sites/pragyaagarwaleurope/2018/07/19/how-inclusive-is-your-organisation-here-is-how-to-use-inclusive-design/#7c51479f4d18> [↑](#footnote-ref-9)
10. <https://www.w3.org/WAI/fundamentals/accessibility-intro/> [↑](#footnote-ref-10)
11. <https://www.blankrome.com/publications/ada-website-accessibility-lawsuits-rise-companies-should-review-their-potential> [↑](#footnote-ref-11)
12. <https://inclusivedesignprinciples.org/> [↑](#footnote-ref-12)
13. <https://konceptapp.com/blog/2015/12/03/how-much-would-you-pay-to-save-a-product-with-bad-ux> [↑](#footnote-ref-13)
14. <https://www.and.org.au/articles.php/37/workplace-considerations-for-inclusion-of-people-with-disability> [↑](#footnote-ref-14)
15. <http://disabilityleaders.com.au/> [↑](#footnote-ref-15)
16. Information and Communications Technology in the Australian Public Service – the need for change, AHRC: 2015: <https://www.humanrights.gov.au/our-work/disability-rights/publications/information-and-communications-technology-australian-public>  [↑](#footnote-ref-16)
17. <https://www.finance.gov.au/blog/2016/09/09/Accessibility-ICT-Procurement-Standard/> [↑](#footnote-ref-17)
18. <https://www.theguardian.com/australia-news/2018/jul/25/my-health-record-website-wont-let-blind-users-opt-out> [↑](#footnote-ref-18)
19. <https://www.communications.gov.au/policy/policy-listing/marrakesh-treaty-people-print-disability> [↑](#footnote-ref-19)
20. <https://www.ft.com/content/6ccfdcce-3f2b-11e8-bcc8-cebcb81f1f90> [↑](#footnote-ref-20)
21. <https://www.ahri.com.au/assist/inclusion-and-diversity> : <https://www.humanrights.gov.au/news/speeches/unconscious-bias-and-bamboo-ceiling> : <https://www.apsc.gov.au/unconscious-bias> [↑](#footnote-ref-21)
22. Vision2020’s “Position statement on meaningful employment for people with disability in the Australian Public Service” October 2017 at: <http://www.vision2020australia.org.au/uploads/resource/248/Position-Statement-on-Meaningful-Employment-January-2018.pdf>. [↑](#footnote-ref-22)
23. <https://probonoaustralia.com.au/news/2018/04/disability-groups-call-accessible-ict-public-service-workplaces/> and <https://www.themandarin.com.au/91210-disability-groups-call-for-accessible-ict-in-public-service-workplaces/> [↑](#footnote-ref-23)