

Submission  
No 35

**INQUIRY INTO PROCUREMENT PRACTICES OF  
GOVERNMENT AGENCIES IN NEW SOUTH WALES AND  
ITS IMPACT ON THE SOCIAL DEVELOPMENT OF THE  
PEOPLE OF NEW SOUTH WALES**

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## INQUIRY INTO PROCUREMENT PRACTICES OF GOVERNMENT AGENCIES IN NEW SOUTH WALES AND ITS IMPACT ON THE SOCIAL DEVELOPMENT OF THE PEOPLE OF NEW SOUTH WALES

**Organisation:** Apptitude Pty Ltd accessibility online

**Date submitted:** February 28, 2024

### Introduction

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Apptitude Pty Ltd appreciates the opportunity to provide a submission on Government Agencies' procurement practices to ensure that requirements to make services and facilities inclusive and accessible – also, importantly, includes the very significant percentage of our population with vision- and print-accessibility issues – not just those with mobility issues.

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) states:

“People with a disability are not disabled by their impairment  
but by the barriers in their community.”

### What are accessible publications?

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Accessible publications are designed to enable individuals with a print disability to have equal access to online documents and websites. That is, anyone with a visual, perceptual or physical condition that results in an inability to read, or to have difficulty in reading printed material, including online publications.

Although many organisations today pride themselves on being accessible and inclusive, too many only consider physical accessibility such as ramps, handrails, wheelchair access, etc. Not being able to read the printed word can be a major barrier in accessing and understanding information by:

- blind or low-vision individuals who use assistive technologies such as screen readers or magnification software;
- people with arthritis that makes it difficult to hold a book or turn pages;
- people suffering from multiple sclerosis or neuromuscular disorders, such as muscular dystrophy, whose muscle weakness or shaking make them unable to read;
- people with limited finger dexterity or mobility, other types of physical disability or injuries that inhibit their use of reading materials;
- people with a perceptual disability such as dyslexia;
- students who are not visual learners;
- people with low literacy or learning difficulties.

## How many people does it affect in NSW?

In Australia	Estimate for NSW
<p>Apart from the legal, ethical and moral imperatives for inclusive publications, there are also economic ones.</p> <ul style="list-style-type: none"> <li>• The Australian Publishers Association highlights research indicating that non-inclusive publications risk missing out on reaching over 20 per cent of people.</li> </ul>	
	1.6 million people
<ul style="list-style-type: none"> <li>• Vision 2020 Australia estimates that there are over 575,000 people who are blind or vision impaired in Australia (2.17 per cent).</li> </ul>	
	173,600 people
<ul style="list-style-type: none"> <li>• The Australian Dyslexia Association reports that 10 per cent of the population has dyslexia – that’s more than 2 million Australians.</li> </ul>	
	800,000 people
<ul style="list-style-type: none"> <li>• The Australian Bureau of Statistics estimates that 13.7 per cent of Australians have low or very low levels of reading literacy (proficiency level 1 or below, as defined in the 2013 OECD Survey of Adult Skills)</li> </ul>	
	29,729 people
<ul style="list-style-type: none"> <li>• A further 30 per cent have insufficient reading skills to be able to understand or evaluate more than fairly simple written text (proficiency level 2 in the OECD survey).</li> </ul>	
	2.4 million people

- The Australian Institute of Health and Welfare reports 9.4 per cent of people aged over 55 have some form of vision impairment, while presbyopia (considered a natural effect of ageing) alone affects the eyesight of 1.3 million older Australians (4.9 per cent of the population). 392,000 people

Anecdotal evidence suggests that the major reason students with a vision- / dexterity-disability drop out of school and university is the lack of accessible course notes. This is just one example of the impact lack of online print access has.

## Relevant Government legislation and international guidelines

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Although general in its wording, government legislation does not specify types of accessibility and departments and agencies have focused on physical access for those with mobility impairments:

1. Federal Government legislation (*Disability Discrimination Act 1992*) requires all government departments and agencies to ensure their information and services are provided in a non-discriminatory accessible manner.”
2. **New South Wales Government Disability Inclusion Act (2014)**. The objects of this Act are as follows—
  - (a) to acknowledge that people with disability have the same human rights as other members of the community and that the State and the community have a responsibility to facilitate the exercise of those rights,
  - (b) to promote the independence and social and economic inclusion of people with disability,
  - (c) to enable people with disability to exercise choice and control in the pursuit of their goals and the planning and delivery of their supports and services,
  - (d) to provide safeguards in relation to the delivery of supports and services for people with disability,
  - (e) to support, to the extent reasonably practicable, the purposes and principles of the *United Nations Convention on the Rights of Persons with Disabilities*,
  - (f) to provide for responsibilities of the State during and following the transition to the National Disability Insurance Scheme.

3. Web Content Accessibility Guidelines (WCAG) 2.2 is considered the standard for web accessibility best practices cover a wide range of recommendations for making online content more accessible for people with disabilities, including those with blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these, and some accommodation for learning disabilities and cognitive limitations.

**There appears to be no formal requirement in procurement practices to take online print accessibility into account.** And yet all government departments and agencies commission and design online publications and websites.

## Recommendation

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That the New South Wales Government procurement policy recognises the social, economic and moral imperatives for its legislation on inclusiveness and accessibility to also include the hundreds of thousands, if not millions of people in this state whose barriers to government information and services, social access, education, financial, medical information, tourism information, and much more, should equally encompass people whose vision or manual dexterity are barriers to accessing online publications and websites.

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## Who is Apptitude accessibility online?

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We are a leading provider of print accessibility for online publications and websites.

Apptitude Pty Ltd began in 2010 as a developer of apps for online books. In 2018, it launched the successful Central Coast tourism and leisure magazine, COAST, the online version of which is now an accessible publication – possibly the first in Australia.

Blind readers have shared their amazement in being able to read any magazine for the first time!

Apptitude places a high importance on consistency of functionality and logical navigation flow. We work daily with graphic designers and understand brand integrity, quality of design and, importantly, messages that are easy to read and easy to understand.

Our accessibility conversion expert, David Jackson, is an experienced and internationally qualified accessibility designer specialising in high-quality and compliant accessible documents, forms and templates and is an advocate and accessibility volunteer with over 30 years' experience in the print and design industry.

Catharine Retter is a co-founder of Apptitude Pty Ltd and publisher of COAST magazine. She was on the Board of Alzheimer's Australia (now Dementia Australia) for 11 years and has witnessed first-hand how important communication through the written word is for people with decreasing access to the outside world – whether because of impaired vision, macular degeneration, cognitive impairment, etc.

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