Communications Alliance

Guidance for developing documents to address the accessibility needs for telecommunications products and services

Provides guidance to Communications Alliance, including Reference Panels, Working Committees and other Groups when developing Standards, Codes, Guidelines or other documents so that equity in access to telecommunications products, services and information for people with disabilities is ensured, and that responsibilities under relevant legislation are met.

This guidance information is available in hypertext format from the Communications Alliance website at https://www.commsalliance.com.au/Standards-GuidanceDevelopingDocuments.This information has been recreated in this PDF format for ease of use and is available from the same webpage.

Contents

1 OBJECTIVES

The following guidance for developing Communications Alliance documents is to address the accessibility needs for telecommunications products and services. It is intended is to:

a) provide assistance to Communications Alliance, including Reference Panels, Working Committees and other Groups when developing Standards, Codes, Guidelines or other documents so that equity in access to telecommunications products, services and information for people with disabilities is ensured, and that responsibilities under relevant legislation are met;

b) inform industry participants as to how they can operate to provide equity in access to communications products, services and information to eliminate barriers, foster inclusiveness and meet the needs of the community;

c) encourage all industry participants to consider Universal Design features in all development processes;

d) inform industry participants as to how they can ensure that information provided to people with disabilities is accessible. This includes the following measures by industry:

e) industry participants' front of house staff have the training and facilities to provide information about features of the carriers' or carriage service providers' products and services that make their use accessible to people with disabilities; and

f) the information itself is accessible to people with disabilities; and

NOTE: This can include providing information in large font sizes or on accessible websites.

g) be source of information to which consumers may refer about equity in and access to communications for people with disabilities.

NOTE: This guidance does not provide legal advice or substitute for any specific obligation that industry participants must comply with under legislation, including but not limited to the *Disability Discrimination Act 1992* and related State and Territory legislation, the *Telecommunications Act 1997* and the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.

2 GUIDELINES

2.1 Consultation with people with disabilities

NOTE: In order to encourage industry best practice on accessibility inclusiveness, it is practical to consult with people with disabilities in the inaugural stages of the sourcing, development or introduction of any such goods or services.

2.1.1   Consultation with people with disabilities by Communications Alliance

As necessary, Communications Alliance will seek advice from organisations representing person/s with disabilities.

2.1.2   Consultation with people with disabilities by industry

Where products, services or information are likely to impact on people with disabilities, industry participants should consult with appropriate people with disabilities in the initial stages of its development.

2.2 Provision of Information

NOTE: Equity in access to communications products and services is linked to equity in access to information about such products and services.

For people with disabilities the term 'accessible information' has two levels of meaning. The first refers to the manner in which the information is presented. In this context the use of the term 'accessible formats' is common. The second refers to the ease of comprehension of the information presented.

Information may be provided indirectly by way of brochure or website, or directly by phone or in face-to-face presentation.

2.2.1   Indirect Provision of Information

a) Communications Alliance and industry members are encouraged, as far as practical, to facilitate that:

b) Standards, Codes and Guidelines that significantly impact on consumers (e.g., those that are eligible for reimbursement of costs by the ACMA) are written in easy-to-understand English or have available an explanation of the Standard, Code or Guideline in easy-to-understand English.

c) any documentation is made available in alternative formats upon request. This includes but is not limited to large print or electronic format. Electronic documentation should be created in such a way that it is accessible to computer screen reader software used by people who are blind or have vision impairment.

d) all printed consumer information is designed with appropriate font size, style and colour, appropriate colour contrast between background and text, and with clear, defined graphics to maximise their readability for people with vision impairment.

e) all industry websites, including the Communications Alliance website, meet international web accessibility guidelines at least to the standard required by the Australian Government.

2.2.2   Direct Provision of Information

NOTE: Equity in access to direct modes of giving information means that a range of different ways of interacting with people with disabilities should be available, and the appropriate one used on request.

a) Customer enquiry or assistance should include sufficient text communication facilities for people who are deaf, speech or hearing impaired. Facilities provided should enable communication in an appropriately speedy manner. Customer enquiry or

assistance service operators should receive regular training in the efficient use of the relevant communication devices.

b) Customer service staff should receive regular training in the use of a range of communication modes used by the respective organisation.

c) Customer enquiry or assistance service counter staff should provide facilities which enable communication.

d) Service providers should ensure that customers can be easily assisted by an advocate, if required, when communicating with a supplier.

e) When Communications Alliance Standards, Codes and Guidelines mention access to the Emergency '000' number and where appropriate, the TTY Emergency number '106' should also be mentioned.

2.3 Universal Design

The principles of Universal Design should be taken into account, where relevant, in the development of Standards, Codes and Guidelines, and in the development of all products and equipment See the [Principles of Universal Design](#) at the NC State University website.

3 REFERENCES: LEGISLATION AND INFORMATION

The information in this section is provided to assist with the application of this Guidance.

There is both national and international legislation to ensure non-discrimination including in the provision of services, and increasingly, national and international guidance on the steps industry can take to achieve equality in accessibility.

The references in this section are provided as a background indicating that this Guidance is part of a greater body of work in terms of accessibility to communications technologies.

As well as legislation, some industry participants and consumer organisations have developed Accessibility and Inclusion Action Plans, Guides or Manuals which outline best practice procedures for consulting with people with disabilities.

3.1 Relevant Australian Legislation

3.1.1 *Disability Discrimination Act 1992 (Cth)*

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. It encourages everyone to be involved in implementing the Act and to share in the overall benefits to the community and the economy that flow from participation by the widest range of people.

Disability discrimination happens when people with disabilities are treated less fairly than people without a disability.

A brief guide to the Disability Discrimination Act may be accessed online at the website for the Human Rights and Equal Opportunity Commission.

3.1.2 *Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth) (Act)*

The Act provides for a universal service regime which consists of the universal service obligation (USO). The purpose of the USO is to ensure that all people in Australia, wherever they reside or carry on business, should have reasonable access, on an equitable basis, to the standard telephone service, payphones and prescribed carriage services.

3.1.3 *Telecommunications (Equipment for the Disabled) Regulations 1998*

These regulations specify the type of equipment that may be supplied for connection to the standard telephone service by people with disabilities.

3.2 Relevant Australian Information

3.2.1 Relevant Communications Alliance Consumer Documents

Communications Alliance Standards, Codes and Guidelines are available from http://www.commsalliance.com.au/Documents . The documents include the:

    a) Telecommunications Consumer Protections (TCP) Code (C628:2019)

    b) Information on Accessibility Features for Telephone Equipment Code (C625:2020)

3.2.2 Accessibility and Inclusion Action Plans and Good Practice Guides

    a) Australian Mobile Telephone Association (AMTA) Mobile Phone Industry Good Practice Guide: Accessibility for People with Disabilities

    b) Optus Accessibility and Inclusion Action Plan can be accessed via the Optus Disability Service webpage

    c) Telstra Accessibility and Inclusion Action Plan can be accessed via the Telstra Disability Service webpage

    d) TPG Telecom information in relation to accessibility can be found here.

e) [nbn Accessibility and Inclusion Plan](#) can be accessed via the nbn Disability Service webpage

Please check the websites of other telecommunications providers for their respective initiatives.

3.2.3 Australian Human Rights Commission (AHRC)

a) [Telstra Accessibility and Inclusion Action Plans](#) are lodged with the Australian Human Rights Commission (AHRC).

b) [Optus Accessibility and Inclusion Action Plan](#) is lodged with the Australian Human Rights Commission (AHRC).

c) [nbn Accessibility and Inclusion Plan](#) is lodged with the Australian Human Rights Commission (AHRC)

d) [Access for all: Improving accessibility for consumers with disability](#)

NOTE: It is important that the communication needs of Deaf people are met. A range of communication methods are used according to the nature of the hearing impairment, and it is necessary to use the one that is most appropriate in any given interactive situation. Deafness Forum of Australia has published Guidelines to assist in this process.

For further information go to the [Deafness Forum](#) website.

3.2.4 Australian Information on plain language and word choice

Communications Alliance publications are written for the communications sector to specify obligations, requirements and guidance for its members to perform their technical and operational activities. They also need to ensure that requirements are enforceable by the respective regulator. Taking into account the constraints imposed by the need to document the specificity required by our publications, relevant Working Committees are encouraged to take into account the concepts of easy-to-understand English so that as many people as possible can understand the meaning of the documents.

For advice on writing using such language, go to the [Plain Language Australia](#) website and the Australian Style Manual for [plain language and word choice](#).