Better acknowledging and resourcing the information accessibility sector in Australia

Final report

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**Silent Signs

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Acknowledgement of Country

We respectfully acknowledge the Bedegal people as the Traditional Owners of the land on which the Centre for Social Impact UNSW is located in Sydney. We pay our deep respect to Bedegal elders past and present and extend that respect to all Aboriginal Torres Strait Islander peoples.

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Note: This report does not have an Executive Summary – please refer to the summary copy of the report instead for a brief version of the findings.

1   Introduction

The recent COVID-19 pandemic, bushfires and floods have very clearly highlighted the importance of providing accessible information for people with disability.

People with disability have **always** needed accessible information that is good quality, timely, accurate and updated across a whole range of areas in their lives. Yet the heightened conditions of the pandemic and the weather disasters that have happened in recent years have shined extra light on what it means and what it takes to provide this information well, as well as the consequences when there are barriers to providing it. Given the likelihood of the crises associated with weather disasters deepening in the forthcoming years due to climate change, as well as the ongoing nature of many public health issues in Australia, it is critical to take note of the lessons from the pandemic, bushfires and floods about information accessibility for people with disability.

In Australia, the creation and distribution of accessible information is actioned by a small range of organisations who design, co-design, author, test and distribute a range of different types of accessible resources. Many of these organisations are not-for-profits focused on disability advocacy, for whom the creation of accessible information is not always core business – yet they do it anyway, as they recognise its importance. Alternatively, many others are social enterprises or small businesses dedicated entirely to the production of one particular format of accessible information. Either way, as shown in this report, many-to-most of the organisations contend with constrained business circumstances, while also trying to craft a place for a product – accessible information – which is often under-recognised and under-resourced in Australian public life.

Within this context, this report examines the experiences of the organisations who provide accessible information in Australia. The report has four main sections:

1. A model of what it means for information to be accessible for people with disability.
2. An examination of the experiences of accessible information provider organisations during the COVID-19 pandemic, bushfires and floods.
3. An analysis of the system-based facilitators and barriers for accessible information providers in Australia.
4. Recommendations for how to improve the circumstances available to accessible information provider organisations.

This report focuses on practical and actionable information. More of the conceptual and theoretical analysis associated with the research will be available in other forthcoming publications, such as academic journal articles.

2   Policy context

As a starting place for this report, it is important to understand the policy context for the provision of accessible information for people with disability. In Australia, this policy context starts with a right to accessible information under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and then flows through to legislation and other disability policy frameworks at a national level.

➤ Article 21 of the **UNCRPD** notes: "States Parties shall take all appropriate measures to ensure that persons with disabilities can exercise the right to freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice… including by… providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost" (UNCRPD, Article 21).

➤ The **Disability Discrimination Act 1992** (Commonwealth) "makes it unlawful to discriminate against a person with disability in the areas of work, education, access to premises, provision of goods, services and access to facilities, provision of accommodation, land, membership of clubs and unincorporated associations, participation in sport, and the administration of Commonwealth laws and programs. These are all areas where information and communications issues arise for people with disability" (DRC, 2023b:47). Complaints about a lack of accessible information have been successfully lodged under the Act, but enforcement of information accessibility under the Act mainly requires people to actively lodge complaints[1].

➤ Beyond the Disability Discrimination Act (1992), the Australian states and territories each have a range of measures to address information accessibility, but these are not coordinated, clear or standardised, and often address information accessibility in a piecemeal way (DRC, 2023b).

➤ The Disability Royal Commission recently proposed the creation of a new **Disability Rights Act** and recommended information accessibility be one topic covered within it, with enforcement of this Act possible without a specific individual lodging a

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[1] The Disability Discrimination Act 1992 also contains the authority for sets of standards to be made under the Act, which can be enforced without specific complaints, however there is not currently a dedicated set of standards related to information accessibility. There are building access and public transport standards, which contain some specific and limited components of information accessibility.

complaint (DRC, 2023a). The Disability Royal Commission also recommended that an Associated Plan be developed by the end of 2024 in connection with **Australia's Disability Strategy 2021-2031** "to improve the accessibility of information and communications for people with disability" (DRC, 2023b:72). Of note, it is recommended that this Plan "focus, in the first instance, on information and communications about preparing for and responding to emergencies and natural disasters, and public health" (DRC, 2023b:73). These recommendations indicate that an improved approach to information accessibility is currently on the Australian disability policy agenda.

➤ The **Disability Services and Inclusion Act 2023** includes the legislative framework for 'information supports and services' to be funded in Australia into the future. This also indicates that the importance of information accessibility for people with disability is on the current disability policy agenda in Australia, including providing the practical policy infrastructure to fund it.

Importantly, there is also indication of the need for accessible information, with implications for people with disability, within disaster risk reduction policies in Australia. This sits together with Article 11 of the UNCRPD requiring all necessary measures to be taken to ensure the protection and safety of people with disability in situations of risk, including natural disasters.

➤ Priority 4 of the **UN's Sendai Framework for Disaster Risk Reduction 2015-2030** is about enhancing disaster risk preparedness. This priority item acknowledges, "Women and persons with disabilities should publicly lead and promote gender-equitable and universally accessible approaches during the response and reconstruction phase [of disasters]" (UN Sendai, 2015:36).

➤ Without mentioning people with disability specifically, Australia's **National Disaster Risk Reduction Framework** includes the following under 'Priority 1: Understand Disaster Risk': "Improve public awareness of, and engagement on, disaster risks and impacts" and "Develop cohesive disaster risk information access and communication capabilities to deliver actionable disaster risk data and information" (Australian Government, 2018:9). The **Second National Action Plan to Implement the National Disaster Risk Reduction Framework** then includes the 'National Action' to "create consistent, accessible information, tools, guidance and programs to help everyone better understand their disaster risk and responsibilities, prepare risk mitigation plans and take appropriate action to manage their risks" (National Emergency Management Agency, 2023:10). Considered in connection with Australia's obligations under the Disability Discrimination Act 1992, it would

presumably contravene the Act to discriminate against people with disability in such disaster information and communications.

➢ At the intersection of disability policy and disaster risk reduction policy, there is also an **Emergency Management Targeted Action Plan** attached to **Australia's Disability Strategy 2021-2031**. This plan includes some mentions of information accessibility actions and responsibilities in particular states/territories (i.e. Victoria, the Australian Capital Territory and the Northern Territory).

In addition to this legal and policy context, significant attention was given by the Disability Royal Commission to the limitations of the accessible information provided to people with disability during the COVID-19 pandemic, in healthcare and public health settings, as well as in a range of other areas including disability service provision, education and employment, sexuality and relationships, and the criminal justice system (DRC, 2023b). The Disability Royal Commission also highlighted the additional barriers experienced by First Nations and culturally and linguistically diverse people with disability, including a lack of culturally appropriate information and the lack of accessible information in Indigenous and community languages (DRC, 2023b).

The combination of all of these areas – especially the Disability Royal Commission's recent recommendation for information accessibility to be covered in a new Disability Rights Act and for an Associated Plan on accessible information, as well as the deepening disaster risk reduction context emerging from climate change – positions the current moment as a critical one for considering what makes information accessible for people with disability and what is required to resource accessible information provider organisations to be able to create and disseminate it as thoroughly as possible. This report speaks to these questions.

3   Existing literature and evidence-base

The following sections provide a short overview of the existing literature about accessible information and human rights approaches, the COVID-19 pandemic and disaster risk reduction, as well as the small amount of literature available about the conditions of the information accessibility sector more generally. It is not intended to be a systematic literature review, but rather to give a brief background to the existing evidence-base in the conceptual areas relevant to this report.

3.1   Accessible information as a human right

The importance of accessible information is recognised within a human rights framework in the existing literature, particularly among Australian researchers (McVilly et al., 2018; Newman, 2019; Newman et al., 2021). In assessing Australia's level of compliance with the UNCRPD in 2020, one report noted that since Australia ratified the Convention in mid-2008 there had been obvious efforts to meet human rights obligations to make more information accessible to people with disability, but that there were still limitations to its compliance, particularly with regard to Auslan, captioning and plain language (McCallum, 2020).

Other research has found that while the right to accessible information is well-recognised, there is not always agreement on what constitutes sufficiently or appropriately accessible information under this rights obligation (McVilly et al., 2018) nor sufficient guidance to those whose job it is the implement that right (Newman et al., 2021). Further, while the right to accessible information is well-recognised in disability policies, one evidence review noted that this does not always flow through to the same recognition in other intersecting policy areas which impact people with disability; the review gave the example of mental health policies not containing clear guidance on implementing the right to accessible information (Newman et al., 2021). This last point is particularly notable given the intersection in the current report of information accessibility with the fields of public health and weather disasters. It implies that for the right to accessible information to be realised, it is not only disability policy which needs to recognise and help implement it, but also the adjacent fields of public health and disaster risk reduction.

3.2   Accessible information and the COVID-19 pandemic

Perhaps reflecting the research findings above about the limitations of recognising the right to accessible information outside of direct disability policy, much research notes significant failures to provide accessible information to people with disability through public health initiatives during the COVID-19 pandemic. At an international level, the COVID-19 Disability Rights Monitor noted that only 35% of people with disability had sufficient accessible

information during the pandemic (Disability Rights Monitor, 2020). Insufficient accessible information is discussed in the literature as a danger to inclusivity in general during the pandemic (Rotarou et al., 2021) as well as to inclusive healthcare and universal access within the pandemic response more specifically (Ebuenyi et al., 2020). In Australia, there is some acknowledgement in the literature that accessible information was required during the pandemic that was accurate and high quality, timely, updated, sufficiently detailed and broad in subject matter, produced together with people with disability and disseminated appropriately (Meltzer, 2020). Critically however, accessible information provision that met these conditions was not always sufficiently supported by government during the height of the pandemic (DRC, 2020).

3.3   Accessible information and disaster risk reduction

The need for accessible information is well-recognised in current disaster risk reduction research (Johnstone, 2014; Stein & Stein, 2022; Villeneuve et al., 2021). In particular, working from a base of Australia and other south-Pacific countries, Villeneuve and colleagues have developed a program of work around the concept of Disability Inclusive Disaster Risk Reduction, which focuses on how to anticipate, respond and adapt to disaster scenarios with the aim of decreased risk and increased resilience for people with disability (Villeneuve et al., 2019). This work acknowledges the importance not only of accessible information as a priority action for people with disability before, during and after disaster events (Villeneuve & Chang, 2023), but also the need for multiple accessible options to meet different accessibility requirements (Villeneuve et al., 2021). Further, it asserts that the production of appropriate, good quality accessible information should be seen as a key skill or responsibility of service providers (Subramaniam & Villeneuve, 2020). The research notes that insufficient accessible information is often provided to people with disability in disaster situations and that this remains an area for improvement (Subramaniam & Villeneuve, 2020). Nevertheless, the inclusion of people with disability as an explicit group within the rights-based Sendai Framework mentioned earlier is seen as a positive development (Pertiwi et al., 2019; Villeneuve, 2021).

3.4   Conditions of the information accessibility sector

Despite the literature demonstrating the human rights context of accessible information and giving insight into the extent to which this right has been realised during the recent pandemic and disaster events, relatively little has been written about the conditions of the organisations who make up the Australian information accessibility sector and who are tasked with creating the accessible information required.

The program of work around Disability Inclusive Disaster Risk Reduction recognises the responsibility of the Australian state and territory governments (who have primary responsibility for disaster management) and emergency services to work together with "disability information services" to ensure that accessible information is available around disaster events – however, without elaborating on who the "disability information services" are or what conditions they face (Villeneuve, 2020). Disability Advocacy Network Australia (DANA) has recently published a discussion paper noting that the work that Australian disability advocacy organisations do during times of disaster includes developing accessible communication materials (Desmarchelier & DANA, 2023). They highlight that disability advocacy organisations' disaster response work is usually unfunded and that this situation "significantly increases the organisations' workload and poses financial and long-term sustainability challenges" (Desmarchelier & DANA, 2023:3). Their discussion paper recommends the establishment of a specific disaster funding stream for disability advocacy organisations (Desmarchelier & DANA, 2023).

Beyond these contributions above, it appears that only a small amount of research has directly or systematically collected the perspectives of accessible information providers about the structural conditions in which they create and disseminate accessible information, either in general or during public health or disaster events. One local study has noted that, at least in 2011, the Australian Government did not have a comprehensive whole-of-government procurement policy for accessible information and communications technology for people with disability (Hawkins, 2011). Internationally, service providers have described how mandating accessible information in the United Kingdom (UK) has increased its availability there, but that, even so, this has not always resulted increased uptake and use of the information by people with disability (Chinn, 2017, 2019; Chinn & Rudall, 2021). One study spoke to UK-based not-for-profit providers of Easy Read health information, finding tensions between the business sustainability requirement to complete commissioned 'Easy Read translations' of documents and the desire of the providers to instead work in a more ideal open-ended, inclusive and/or co-productive way, where the interests of people with intellectual disability themselves drive the Easy Read production agenda (Chinn, 2019). The competitive environment that this situation creates, where providers compete for commissioned translation work, does not necessarily aid the creation of a consistently crafted or understood Easy Read product:

> "Small [not-for-profit organisations], lacking reliable public funding, now face precarious futures and production of [Easy Read health information] has emerged as one income-generating opportunity that was allowing them to stay afloat. Moreover, participants' accounts suggest that the market environment puts pressure on these

organisations to develop a unique offer to distinguish themselves from their competitors, rather than adhering to more standardised practices" (Chinn, 2019:417).

Aside from these few insights, the conditions of the information accessibility sector in more of a structural sense (e.g. business, workplace or policy considerations) is a gap in the literature, especially in the Australian context. This is a notable omission, as – given that the need for more high-quality accessible information is frequently highlighted, particularly in the context of climate change and increasing potential for weather disasters – it is imperative to understand what is required by its provider organisations to make that happen. This is the evidence-base to which this research responds.

4 Method

4.1 Research questions

The research questions examined in this study are:

a) What concept/s of accessibility need to be foregrounded for effective accessible information production in Australia?
b) What was the experience of accessible information providers during the pandemic, bushfires and floods?
c) What facilitators and barriers/constraints do accessible information providers currently face?
d) What structural, resourcing and policy changes are required in Australia to best ensure the provision of accessible information for people with disability during public health crises and weather events?

4.2 Data collection

The following data collection and verification methods were included in the research, as described below. During the planning and execution of these data collection processes, the project also received advice and guidance from two advisors with lived experience of disability.

a) **Workshop with partner organisation:** The research process started with a workshop with a partner organisation, IDEAS Disability Information. IDEAS Disability Information has extensive experience in providing accessible information in Australia, across format types, including a substantive role in delivering accessible information during the height of the COVID-19 crisis. The workshop was a 2-hour online focus group with four IDEAS Disability Information staff members, dedicated to developing an expansive understanding of what information accessibility means. The purpose was to ensure that the meaning of accessibility which underpins the project is based on an authentic, detailed and practical understanding, drawn from the lived experiences of people with disability.

b) **Interviews with accessible information provider organisations and other stakeholders:** Online interviews were then undertaken with representatives of 16 organisations who make accessible information and one external stakeholder involved in supporting its creation and dissemination, but who does not make it directly. The interviews were conducted on Teams/Zoom, took 45-60 minutes each and focused on background to their organisation and work, their organisation's

understanding of information accessibility, their experience of providing accessible information during the COVID-19 pandemic, bushfires and floods, and future structural and policy changes which would benefit their work. The interviewees were also asked to reflect on a preliminary model of 'information accessibility' as a concept, drawn from the workshop with IDEAS Disability Information, with this model then refined as a result of their contributions. Accessibility supports for the interview process were supported and paid for from research funds.

c) **Verification of the preliminary findings with participants:** The preliminary research findings were returned to the workshop and interview participants by email, for them to comment on and help in refining the results. The purpose was to ensure that the results 'ring true' and would be practically useful for the accessible information provider organisations who dedicated their time to the research.

The report from the research is being made available in a range of accessible formats.

4.3   Participants

Sixteen accessible information provider organisations participated in the research, as well as the partner organisation – totalling 17 accessible information provider organisations. Some information about these organisations is included below. Some organisations gave permission for themselves to be named in a participant list (see Appendix 1).

Table 1: Type of work done by participant organisations

Disability type	Information type the organisations provide and/or advise on	Number of organisations
Intellectual disability	Easy Read or Easy English*	4
Complex communication needs	Interactive symbolised formats	1
Low vision and blindness	Screen readers, audio formats, Braille	2
Hearing loss**	Captioning, hearing loops	1
Deaf, Auslan users**	Auslan interpretation (live and video-based)	2
Low literacy	Easy English*	1
Generalist	Operating across multiple formats	6

*Providers making information for people with intellectual disability variously described themselves as making either Easy Read or Easy English information. However, one provider noted making Easy English information for people with low literacy more broadly than intellectual disability. They are therefore listed separately, as the key organising feature of this table is disability type.

**These two categories are separated as two of the organisations in question specifically focused Auslan, whereas one additional organisation was focused on hearing loss but did not represent Auslan users. There is however, of course, some overlap in the forms of accessible information that these two groups access.

Table 2: Business model of participant organisations

Business model	Number of organisations
Not-for-profit	11
Small business	4
Social enterprise	2

Table 3: Organisational type of participant organisations

Organisational type	Number of organisations
Disability advocacy organisation	10
Specialist accessible information provider	5
Other	2

Table 4: Jurisdiction of participant organisations

Location/jurisdiction	Number of organisations
National	14
State-based	3

In addition, one interview was undertaken with an external stakeholder in the creation of accessible information, i.e. another body supporting the creation and disseminating of this information, but who does not make it themselves[2]. It is a limitation of the research that more information from external stakeholders is not included. While the research team invited a broader array of external stakeholders to contribute, there was less take up of the invitations to participate. Future research should include data from other external stakeholders, including government, statutory bodies, commissioning bodies of accessible information and representatives of industries doing intersecting work, for example, graphic design, media and communications agencies. The addition of perspectives from these groups would ensure that insight into the information accessibility sector is not one-sided only to those making accessible information, but rather includes the requirements of those funding and commissioning the information as well.

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[2] Because only one external stakeholder was included, verbatim quotes are not marked to differentiate between accessible information provider organisations and external stakeholder organisations, as this would – in net effect – breach confidentiality. All verbatim quotes are therefore labelled only as a numbered "ORG", so that the external stakeholder is not identified in the data.

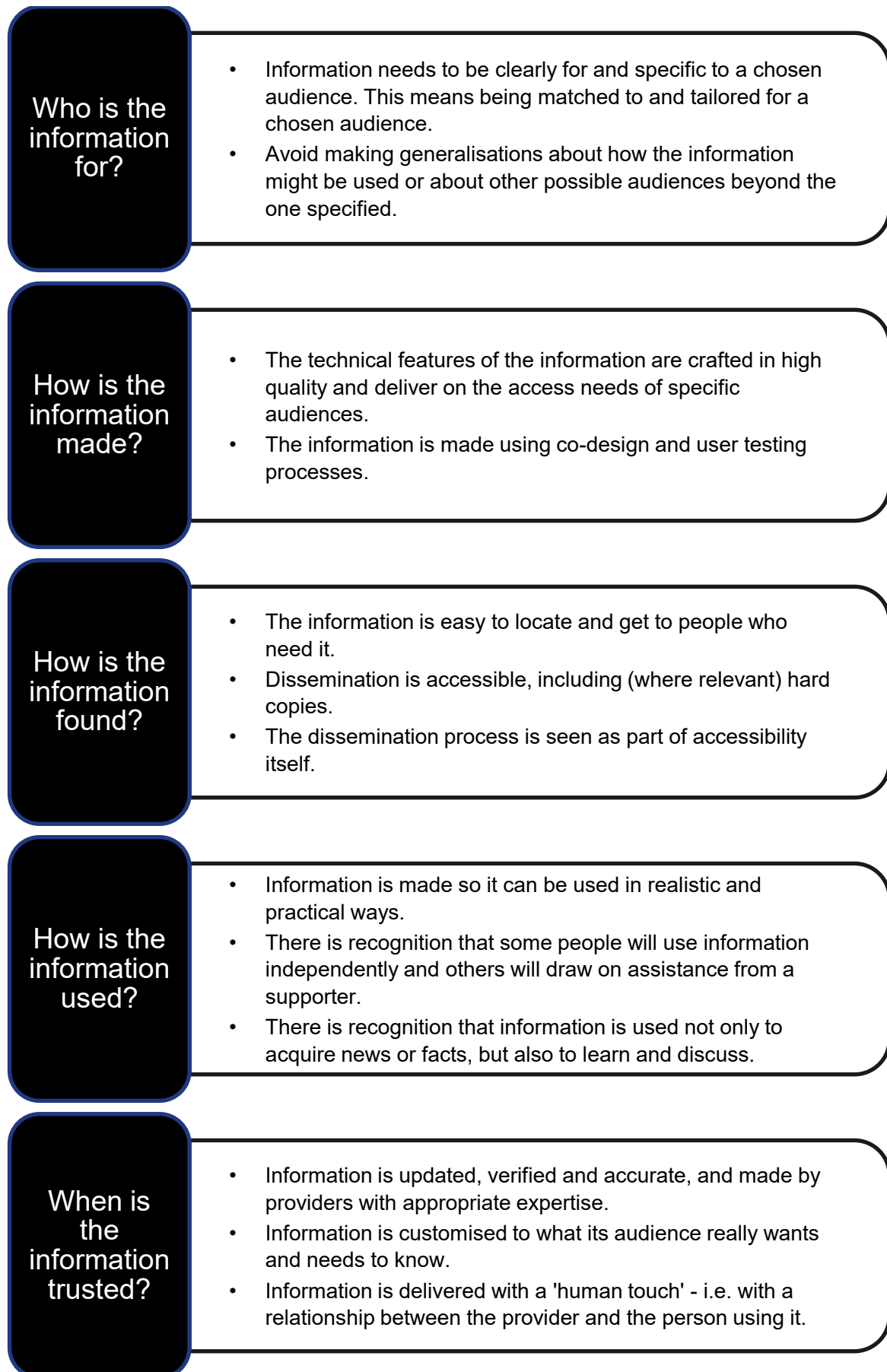## 5   What does it mean for information to be accessible?

One element of the research was to explore the meaning of 'information accessibility'. This exploration aimed to go beyond the specific technical specifications involved in any particular type or format of accessible information. Rather, the intent was to understand the broader concept of information accessibility, as it cuts across different accessible formats.

Accordingly, the research developed a model of 'information accessibility' as a concept. The process of developing the model began with core considerations raised by the workshop participants and then additional dimensions were added based on the series of interviews.

The resulting model contains five key dimensions of information accessibility – expressed as plain language questions designed to prompt thought about what considerations need to go into the creation of accessible information for people with disability. The model is depicted in brief in Figure 1 below (with alt text included). Further details and a full analysis will be included in later publications. Many of the elements of this model of information accessibility are reflected in other findings that follow in this report.

Figure 1: What does information accessibility mean? A conceptual model.

Who is the information for?

- Information needs to be clearly for and specific to a chosen audience. This means being matched to and tailored for a chosen audience.
- Avoid making generalisations about how the information might be used or about other possible audiences beyond the one specified.

How is the information made?

- The technical features of the information are crafted in high quality and deliver on the access needs of specific audiences.
- The information is made using co-design and user testing processes.

How is the information found?

- The information is easy to locate and get to people who need it.
- Dissemination is accessible, including (where relevant) hard copies.
- The dissemination process is seen as part of accessibility itself.

How is the information used?

- Information is made so it can be used in realistic and practical ways.
- There is recognition that some people will use information independently and others will draw on assistance from a supporter.
- There is recognition that information is used not only to acquire news or facts, but also to learn and discuss.

When is the information trusted?

- Information is updated, verified and accurate, and made by providers with appropriate expertise.
- Information is customised to what its audience really wants and needs to know.
- Information is delivered with a 'human touch' - i.e. with a relationship between the provider and the person using it.

6 How was accessible information provided during the COVID-19 pandemic?

The participant organisations spoke extensively about the experience of making accessible information during the COVID-19 pandemic, particularly during the early days of the crisis in 2020 and the extended lockdowns in 2020 and 2021. Their perspectives covered four main areas: (1) Responding to the intensity of the crisis; (2) Making fraught decisions about content, phrasing and detail; (3) Dealing with workforce impacts; and (4) Working within an uncooperative system. Each theme is examined in more detail below.

6.1 Responding to the intensity of the crisis

The accessible information provider organisations who participated in the research noted they were acutely conscious, right from the first days of the COVID-19 crisis, that there was a very high level of need for accessible information, that they had a responsibility to provide it, and that the consequences of not doing so would be dire.

> [Accessible information was] in very high demand… a lot of the information coming out was really high-level, and because it was always in the media and everyone was talking about it, people really wanted information about it that they could understand (ORG_17).

> I was super distressed and terrified when [the pandemic] started… I knew that… the most vulnerable population in this country, the people that were most likely to die, the people that I knew would not get an ICU bed prioritized for them… were the ones that were not getting the information they needed (ORG_09).

Within this context, the providers spoke about working very hard to make a much larger volume of accessible information than they had ever been required to before, with a pace and immediacy of required timelines beyond anything they had experienced before.

> I interpreted [into Auslan] for [a podcast] about COVID, when [the pandemic] first started… I did over 400 of those [podcast episodes] (ORG_12).

> It was four times, you know, our calls grew by four times just like that, on a daily basis (ORG_05).

> It was very fast paced, because things were changing constantly… We created a numerous amount of posters and information fact sheets for people on COVID… [in] Easy English or plain language, plain English (ORG_03).

Every day, for six months, I would put something out… we were getting to the stage of less than 12-hour turnaround from when it was announced to the public (ORG_18).

Responding to the high need and volume of information, and doing so within the required timelines, was made particularly difficult by other factors. The constantly-changing nature of the information's content was a challenge:

The information that we need[ed] to disseminate [was] just ever changing. Like there [was] a large volume of information to disseminate, keep updated… when you're putting together accessible information, whether it's [Easy] English or videos or whatever, like, it is a process and it can take a day. And by the time you've taken the day to do that, the information has already changed. It's evolved already (ORG_13).

We noticed that a lot of information that was coming out from the government was very complex, was hard to navigate, was hard to access, was all digital and changed constantly. So by the time a bunch of not-for-profit organisations had done the rolling through and translating that into accessible formats, it was irrelevant because the rules had all changed again (ORG_05).

Furthermore, for most organisations, even obtaining the content to put into their accessible information products was difficult, as there was not a direct source of correct, clear information nor – at least at the beginning of the pandemic – enough preparation time and background given to accessible information provider organisations to properly source the details:

We had to then try and advocate and lobby to try and get any information directly to us from the departments… there was no way that [department 1] could deal with [department 2] to try and get any of that information to come up to us directly before it was put out publicly. So we had to sit there on phone… and listen to those updates as they were be being given by the Premier in whatever state, because we weren't getting the information any other way (ORG_05).

At the beginning, there were no [preparation options], it was just like, put you on there, start, talk, I'll talk and you sign [into Auslan]. And so… it was clunky. But I think as time went on… [the interpreters] were able to then fight and go, "No, actually, you need to give us information, you need to give us written stuff, so we can do our research". As time went on, yes [that happened], but at the beginning, no (ORG_12).

In addition, some organisations found that to respond to the intensity of the COVID-19 crisis, they needed to diversify their range of accessible information products. Sometimes this was because there was not enough time to go through the required processes for making their usual products:

> Cost and time. It's expensive to produce Braille. It's expensive to purchase CDs and record on to them and then distribute them. But it's also it chews up a lot of time… we allow six weeks for [making] information… And if you think about that [in] COVID times, information could change within hours, so there was no point in trying to use a lot of those things, because by the time that got to people, the information was wrong (ORG_02).

In other cases, providers realised that people with disability were not, during the pandemic, in the conditions that they required to use the usual products successfully. For instance, one provider explained:

> [We] particularly find [that] when people are stressed or anxious, then reading can be even more difficult. And if people were stuck at home by themselves, they might not have the support they would need to read a document (ORG_17).

For these reasons, in seeking to respond to the high level of need for information during the early days of the COVID-19 crisis, some accessible information providers expanded their range of products to include videos, animations, regular live feed sessions and direct phone calls to clients/members, to ensure that the information they provided was being received. It is important to note that this diversification was happening at a time when providers were already working within difficult conditions of high need, high volume of required information and very fast-paced timelines.

6.2   Making fraught decisions about content, phrasing and level of detail

Beyond meeting the need, volume and pace required for information products, the accessible information provider organisations who participated in the research also discussed making fraught decisions about the content, phrasing and level of detail of the information they produced. The providers took seriously the responsibility of passing on the 'right' information in the 'right' way. For providers of Easy Read and Easy English information, this often meant landing on the required degree of content:

> What are the compromises when you make information simpler, when you reduce the detail? How do you compromise the lack of detail with accuracy and get the most important things across? You know, because, sure, you could break it down into

detail and have a 40-page Easy English document, but nobody's going to read that. So it's more important to put the most important things into a three-page document (ORG_09)

For Auslan-focused organisations, it meant finding ways to communicate content which did not have a clear-cut avenue for translation:

> There [were] a lot [of words] that didn't have actual signs attached to them. So… some of the genetic information would be quite long-worded. And I was like, I can't spell that without writing it down. So before the podcast started, I'd say "They're talking about this. And it was a long word, I'm gonna spell it for you. Now what that means is, it's a genetic thing, your genes, I'm going to shorten it to dx or whatever through the podcast" (ORG_12).

For organisations working for people with complex communication needs, it could mean anticipating what information their clientele might want:

> What are people worried about, asking about or not talking about? Because potentially they don't, you know, don't have an easy opportunity to discuss those things… these are maybe things that aren't being discussed enough. What can we do to address this? (ORG_15).

Within the complexity of these decisions, some providers grappled with where to place a limit on the information they would provide. For some, the requirement for medical knowledge and expertise was a fraught area. Some providers attempted to create accessible information with medical content and have it checked by those with medical expertise, whereas others felt that obtaining an adequate check was beyond their capability at the time and that medical information therefore presented the limit of their input:

> [I was] trying to get [the medical information] right and running it by people and because, of course, I'm not a doctor and I had to get it technically right as well (ORG_09).

> Where I drew the line was actually doing vaccine stuff. So I was happy to do rules, I was happy to do border changes, I was happy to [do] wear a mask, don't wear a mask, all that sort of stuff. But when it came to [vaccine] injections, I said that needs a medico to approve what [messaging] I've actually converted – and I didn't have that engagement there (ORG_18).

Finally, some accessible information providers noted that they were making these decisions

about content, phrasing and detail during a time of heightened misinformation, during which it was hard for many people to trust information in general. In this context, being a trusted source of information was a heightened responsibility, one which made getting the content, phrasing and detail decisions correct all the more important.

6.3   Dealing with workforce impacts

In addition to responding to the intensity of the COVID-19 crisis and making fraught decisions about the content, phrasing and detail of the information they produced, the accessible information provider organisations who participated in the research also spoke about dealing with the workforce impacts of the pandemic.

Many providers described receiving little-to-no extra resources for making accessible COVID-19 information. The smallest of the providers – mainly (although not exclusively) social enterprises and small businesses – spoke about simply taking on all extra work for free, in addition to their core business, because they saw the high-level of need for the information and felt responsible for providing it:

> This is additional… we don't get funded for this… It has to come out of somewhere… There's an absolute need for it, and yet, not all of it is funded. Some of it we do because we see the need, and people are going "I don't understand this". So we just, you know, we do it (ORG_04).

The slightly larger not-for-profits were somewhat more likely to have received minimal additional resources or funding for their pandemic work. However, they described how this additional funding was not at a level that covered all the extra work or expenses required and/or came with conditions:

> We were expected to deliver to [the government department who funds us], but there was not much that they gave us… we asked for some additional funding, I think in the end they did give us a little bit of additional resources, but it wasn't what we'd asked for. So things like bringing [on] a consultant to work with us, to help speed that process up and figure out how it's going to be best way for us to get that information out there… we weren't able to bring her on board to the extent that we would have liked to at all, because we didn't have the resources (ORG_05).

> As usual, in our sector, being not-for-profit, if we receive a bit of money, it's from, say, government departments for a very specific piece of work. So we received some funding to do some COVID webinars, but they had to be these specific webinars on these specific topics (ORG_17).

Several providers described the pressure that this situation put on their workforce:

> It's really difficult without dedicated funding… it's a bit scattershot, and it's a bit slapdash, and it's a bit of work off the side of the desk. [It's hard] trying to meet the needs of people and being really, you know, like having accessibility and this idea of information-as-empowerment kind of at the core of many organizations – but it has not been yet as well-resourced or supported (ORG_14).

> We only just managed… the reality is, we only just managed to keep up… That caused a lot of pressure internally for us (ORG_05).

> I did not did not take a break, I worked seven days a week for months, probably. There was literally not a day where I didn't work at the start of the pandemic (ORG_09).

Like most other organisations throughout society at the time, there were also logistic challenges to managing accessible information provider workforces during the COVID-19 crisis. While many accessible information provider staff could work from home, organisations focused on making Braille or other vision-related tactile products did have to maintain a presence in the office to use the necessary equipment:

> We're producing a physical product, which means that we needed people in the office – we needed our machines to keep running. Luckily, we were seen as an essential service. So we were able to still send staff into the building to keep embossing and printing and getting the material out there (ORG_07).

Whether working in an office, home or hybrid setting, all provider organisations also spent time juggling rosters, online meetings and an uneven workforce, as staff paused or reduced work when sick or attending to other responsibilities, such as home-schooling.

The impact of the resourcing and logistic challenges of their work, in combination with their understanding of the heightened need for accessible information and the generally high emotions of the pandemic, meant that accessible information provider organisations also needed to deal with the emotional impact of the situation. They variously described feeling "distressed", "terrified", "stressed" (ORG_09) and "frustrated" (ORG_05), as well as noting that they "wish[ed] things could be done better" (ORG_14). One commented, "It was frustrating for us, but least we took the frustration away from the people seeking the information" (ORG_05).

6.4   Working within an uncooperative system

Finally, the accessible information provider organisations noted that they were not only producing much-needed accessible information with complex content in difficult resourcing, logistic and emotional conditions, but also that they were doing so within an often-uncooperative system. Several organisations spoke about how there was limited-to-no awareness of the requirement for accessible information and of what it would take to provide it properly, and that agencies who they had hoped would have been on-board earlier to assist in producing and disseminating it took a long time to play the roles required of them:

> But also the organisations like in the broader society that are responsible for sharing the information… like the health department, for instance, how could they have got better at disseminating this accessible information, so that all of us little organizations or smaller sort of bodies didn't have to all go out and recreate the same information? And, you know, interpret the information that's being told by, say, the health department and then reinterpret that into accessible formats. So I think it would have been great if the other community organizations like health, etc, were able to just disseminate it in an accessible format first (ORG_13).

> The agencies that I thought would be doing this stuff really quickly weren't. You know, they did it, they got there – and it was a bloody great relief when they did, because I was able to go, "Okay, I don't have to do this now" (ORG_09).

This resulted in critical pieces of pandemic information being inaccessible – a situation which the accessible information provider organisations recognised and sometimes tried to remedy, however, their input was not always met receptively:

> There was no way for person X with disability living in Melbourne, to stay on top of all of the changes all the way through COVID. Like, they would have had to watch the Premier announcement daily – and take all of it in and understand all of it. Sometimes there were Auslan interpreters, sometimes there weren't, sometimes they were out of view slightly. Sometimes there were transcripts, sometimes they weren't. And sometimes there were big tables of information that came out that were in tiny little font that you couldn't understand (ORG_05).

> [The QR codes on the template for shops and small businesses] were really small… There was no contrast on it, so that people that were blind were just… not scanning in… I gave [the relevant government department] a whole list of recommendations of what they needed to do and I redid the standard [QR sign in template]… the print

was this small and there was no graphic explainers, so I just redid it. I redid it as a template and said, "Can you just do this?" And they didn't, of course (ORG_09)

Notably, when other agencies sometimes finally did put out late accessible information, it was not always high quality, either in its technical construction or its placement for being easy to find and use:

It took was six weeks for the government… to post Easy Read… [and, when they did] it was six levels down [into their website]. So eventually, they did 25 Easy Read across all the federal and state governments. That was it. They were complex… They were long… a whole lot of [problematic] stuff (ORG_18).

Occasionally, some providers happened upon government contacts who were willing to help in distributing accessible information that was not originally commissioned by government; the degree to which this arrangement resulted in information being put out depended, at least in part, on the level of action-orientation of the specific contacts as well as the degree to which they were willing to support dissemination of information products other than those which government had commissioned itself. In other cases, accessible information provider organisations used their own online presence and/or collaborated with each other or with other types of disability organisations (e.g. day program providers, specialist schools) to try and extend their networks and find dissemination avenues that relied less on government. Such efforts were often successful; as one provider explained, "So [the resources I made] went up [on my website] on the Friday… My website crashed that weekend [from traffic]… and all I'd done was stick it on social media" (ORG_18).

Further comments on the system accessible information providers work within, including its facilitators and barriers, are available later in this report.

7 How was accessible information provided during the bushfires and floods?

In comparison to the pandemic, the participant organisations spoke relatively little about making accessible information about the bushfires and floods. Many accessible information provider organisations had been involved in making disaster preparedness information for bushfires, but beyond this there was relatively little information production work mentioned, particularly work done at the height of a disaster event. This is likely due to the immediate timelines involved in much disaster management and notification work. Some accessible information provider organisations had shifted to instead offering capacity building and training opportunities as an alternative way of addressing the information accessibility requirements of disaster situations. Further details are included below.

7.1 Creating accessible disaster preparedness information

Many accessible information provider organisations spoke about being involved in making disaster preparedness materials, usually for bushfires, but sometimes for floods and other types of disaster events:

> We did work on [name of disaster preparedness plan], which was a fantastic document… that was all about being prepared for in case of emergency and writing down people's numbers, you know, what you're putting in your emergency kit? Where is that emergency kit? Where would you go if you needed to? What would you do with your pets? All that kind of stuff (ORG_01).

> We have done those emergency services materials for a lot of councils and… the [name of fire authority]... making their material more accessible. So that means accessible PDFs, on-demand large print, and accessible electronic text (ORG_07).

> We had a bit of funding for some flood services last year, with the 2022 floods…. So with that, we created some resources and did a bit of like community education on what to do when a disaster hits, like how to make a good disaster management plan for people with disability… what your rights are around things like disaster relief centres and assistance animals, for example. So we created some information on what people's rights are and what they should plan for and consider and that kind of thing and how they can access information (ORG_10).

Importantly, by virtue of the nature of 'preparedness', accessible information provider organisations usually did this work in advance of a specific disaster event or crisis, as a way to ensure people with disability were ready for what might occur. However, sometimes a

specific event – such as the 2022 floods – prompted investment in more of this work for following events, by shifting the need for preparedness onto the radar of those who might fund or commission accessible information. Importantly, although there is a requirement for accessible information to be up-to-date and customised for current situations and events, some accessible information provider organisations mentioned having made disaster preparedness materials in the past and then having them remain in place unchanged, sometimes for up to ten years later.

7.2 Capacity building with emergency services and news media

Aside from directly making accessible information products for disaster preparedness, a few accessible information provider organisations also spoke about offering capacity building initiatives and creating policies to try and upskill emergency services and news media in accessibility:

> We've had number of people come to training from the different fire services… just trying to start building some awareness and capacity building … thinking about, "Okay, if I'm putting out a text message that's going to ping off the towers, what can I do to make this as accessible as possible?" So really re-thinking that messaging and getting rid of things like all caps[lock]…Or like the daily briefing that goes out… thinking about what are you asking the Head of Emergency to read out and then the poor Auslan [interpreter] is [struggling] to try and work out what it was. If we can give them something that's… closer to a simple [Plain English] text that you and I are happy to listen to… it'll be easier for Auslan [interpreters] and speech-to-text [transcribers] (ORG_18).

> We've found with emergencies… there are a lot of really simple things that people could do to increase the accessibility of their information… When news presenters… say, "For more information, call the number on your screen" – and they don't read it out… To… a lot of [blind] people… that's absolutely useless. But all they have to do is… take that extra second and read out those digits…. Or when they show a map and [say], "The fires are moving west from here", it's like, well, how far west and can you can give me some towns? Or where can I get a verbal description of this visual image from to know if I'm affected… Yeah, there is a responsibility that other people could take on… We're actually working on a policy at the moment around emergency preparedness and management. We're going to be making a lot of those recommendations on exactly those things (ORG_02).

This capacity building approach appeared to be in response to recognition that not all disaster or emergency information could be produced separately by accessible information provider organisations, but that much accessible information instead has to be made and distributed directly by the relevant authorities/agencies at the height of a disaster event. Furthermore, the capacity building work that some of the providers offered also appeared to be in recognition that the immediate timelines of, for example, informing the population – including people with disability – about rapid fire spread, rising flood water or immediate evacuation orders required 'mainstream' authorities/agencies to have baseline and/or core accessibility knowledge. In these situations, as they could not make the information directly, some accessible information provider organisations had instead opted to shift to capacity building and training other actors in the system, such as emergency services and news media. As noted in Section 8 of this report, it is also possible that informal actors such as individual citizens and grassroots community groups are providing some of this immediate accessible information on social media.

7.3   Gaps in disaster related accessible information

Some of the participants in the research were also very aware of the gaps in the accessible information provided during disaster events. Two areas were particularly highlighted: accessible information for use in evacuation centres and accessible information to help in navigating recovery services and entitlements after a disaster scenario was over.

> Somebody's needing to evacuate and leave their home, where do they go? … the community centre or evacuation centre. When they arrive there, information is not accessible there either. It's not accessible in Auslan… interpreters are not available… you cannot have interpreters at every evacuation centre… So what do we do? What happens to that person then? Then once the evacuation or the emergency has subsided, what happens? Deaf people are not provided the information on how they are to recover (ORG_16).

> There was a lot of chatter about inaccessibility of information… things like alerts or where to go, and then, of course, whether the evacuation centres themselves were accessible… and then of course, you start getting into like dealing with insurers and all sorts of stuff and whether their information is accessible (ORG_11).

> A lot of people think about the prior and pre, during, but never think about what happens after… that post-fire or post-disaster [time]. What happens… after the fires have happened and the impacts on their life, what happens? Where does the information go? They're supposed to go to websites, are supposed to watch videos

or hear information through radio, but Deaf [people] definitely don't have access to that (ORG_16)

These areas represent possible expansion points for accessible disaster information and places where some accessible information providers wanted to be part of further opportunities to make and provide useful information.

8 What are the system-based facilitators and barriers that accessible information provider organisations work within?

This section of the report takes a systems approach to understanding the work of accessible information provider organisations. The information in the tables below highlights the system-based facilitators and barriers that accessible information provider organisations work within. This description of the system, and its facilitators and barriers, is for information accessibility work in general, not only for pandemic and disaster response. Nevertheless, given the heightened need for accessible information, the nature of the system impacts accessible information provider organisations even more during time-critical, crisis-driven pandemic and disaster response work.

Some important overarching points about the systems analysis detailed below are:

- It is notable that the majority of facilitators exist at the level of individual accessible information provider organisations. This highlights the need for a large degree of self-reliance among these providers, within a system that often provides few other supports.
- It is also notable that most barriers to the work of accessible information provider organisations come from the immediate system around them and, to a lesser degree, from the constrained circumstances of the information accessibility sector itself as a collective. This highlights the need for greater work on and development of the immediate infrastructure enabling both the work of these organisations and their resourcing as a sector.
- Across both layers of the system that accessible information provider organisations work within – the immediate and broader system – there is a need for greater knowledge about what accessibility really means and requires. If key partners that accessible information provider organisations are working with and other relevant actors within the community (e.g. graphic design companies, news media and comms staff) had greater information accessibility knowledge, the work of accessible information provider organisations would be easier.

What is missing from the system described below is how informal actors (e.g. individual citizens, grassroots community groups) may fill some of the gaps in the provision of accessible information when the formalised information accessibility sector does not or cannot provide it. While beyond the scope of this research, anecdotal reports suggest that 'grassroots' accessible information is, for example, commonly distributed on social media during crisis events, with people communicating directly with their own communities. This may have a particular role at times when **immediate** information is required, such as during

bushfire and flood evacuations, and also when community-organising is required around other types of events affecting heath and safety, for example, violence/conflict, sudden political changes and man-made or technological hazards. More research is required into the role of this grassroots accessible information and how it intersects with the formalised work of the information accessibility sector.

Table 5: Facilitators and barriers at the level of individual accessible information provider organisations

Individual accessible information provider organisations	Facilitators	Barriers
	• Staff with technical skills to create high quality accessible information quickly. • Staff and/or consultants with lived experience of using accessible information providing design advice, co-design and user testing. • Collaboration between colleagues with a likeminded interest in accessibility but different skillsets. • Access to design resources – e.g. computer programs, picture sets, tactile printers. • Access to distribution resources – e.g. social media, teleconferencing platforms, technology for remote Auslan interpretation and captioning.	• Extent to which it is possible to absorb costs of unfunded work. • Large amount of time required for production of some accessible formats.

Table 6: Facilitators and barriers at the level of the information accessibility sector

Information accessibility sector	Facilitators	Barriers
The collective of accessible information providers and related agencies, for example, those who make picture sets.	• Collaboration with other accessible information provider organisations. • Cooperation with and accommodations from related agencies, e.g. being provided with a good price and/or affordable licensing options on Easy Read or Easy English picture sets.	• High ongoing costs of critical resources that cross-cut individual projects – e.g. licensing for picture sets for Easy Read and Easy English materials. • Competition between accessible information provider organisations for work and recognition. • Gate-keeping of business and accreditation opportunities by some accessible information provider organisations. • Lack of national guidelines or standards about what constitutes high quality Easy Read and Easy English information. • Lack of picture sets from Easy Read and Easy English that reflect Australian demography and imagery. • Not enough accredited Auslan interpreters available to keep up with demand or that meet specialised skillsets, such as specific cultural, medical or scientific knowledge; tactile interpreting; or media training and TV experience. • Lack of in-depth and thorough Easy Read and Easy English training programs in Australia, resulting in formal accreditation by a recognised industry body.

Table 7: Facilitators and barriers at the level of the immediate system around the information accessibility sector

Immediate system	Facilitators	Barriers
Providers of the content for accessible information products and agencies who fund, commission or procure accessible information.	- Capacity building work done with key contacts and community about information access knowledge and techniques. - Receiving funding for information accessibility work from commissioning bodies or procurement partners. - Willingness of some funders to find creative workarounds for accessible formats that do not fit within available funding options – e.g. additional formats available on-demand.	- Lack of a secure, dedicated and ongoing funding stream for information accessibility work, beyond only individual projects and/or specific document translation. - Lack of consolidated, ongoing funding for critical resources – e.g. Easy Read and Easy English picture sets. - Requirement to convince some funders of the need for co-design and user testing. - Lack of funding for outreach or advocacy work to help disseminate and/or implement accessible information. - Funders not always paying for upkeep or updating of accessible information. - Large amount of time required for business development work (e.g. proposals, quotes). - Tight timelines on commissioned accessible information products. - Few open tender processes for information accessibility work and uneven distribution of work opportunities between accessible information provider organisations, even when Procurement Panels are in place.

		• Big consultancies sub-contracting to smaller accessible information provider organisations, without enough (or, in some cases, any) dedicated resources for them. • Funders commissioning single accessible formats when multiple are required. • Funders delaying the implementation of accessible formats, such that they are out of step with the release of the original information. • Government and other potential commissioning organisations not procuring accessible information options, even when these are required. • Lack of recent whole-of-sector research conducted in Australia about what accessible information products people with disability prefer to use and why, and investigating complexities in how accessible information is provided.

Table 8: Facilitators and barriers at the level of the broader system around the information accessibility sector

Broader system	Facilitators	Barriers
Broader societal organisations and institutions that can facilitate or block accessible information.	• Some legal and policy infrastructure requires accessibility accommodations in specific areas of public life – e.g. captioning on a certain degree of news media via specific television networks. • Increasing accessibility features built into commonly used technologies – e.g. auto-captioning on Teams/Zoom and some social media platforms, accessibility check features on word processing programs.	• There is not one clear place where the requirement for accessible information is legislated, unambiguously outlining all the situations in which it must be provided and how it must be done. • Graphic design companies, news media and communications staff within corporate organisations not understanding or implementing basic accessibility requirements. • Adequate preparation and follow up/quality checking/correction opportunities not always planned into events requiring live accessible information, e.g. Auslan interpretation and human captioning, and live events using auto-captioning. • Lack of champions of accessible information within corporate businesses. • Sectors outside of disability not always understanding information accessibility requirements or obligations. • General society not understanding that accessible information is required everywhere, especially as there is more and more inclusion of people with disability within a range of settings in public life.

9   Recommendations

The following sections provide recommendations to improve the production of accessible information for people with disability in Australia. Although the impetus for and focus of this project was about the experience of providing accessible information during the COVID-19 crisis and weather-related disaster events, the accessible information provider organisations who participated in the research largely did not frame their suggested changes for their sector in terms of these experiences. Rather, they spoke about what is needed to develop the information accessibility sector in general. This reflects a situation in which – while public health and disaster events increase the need and urgency for accessible information and place more acute stress on the organisations involved in making it – the information accessibility sector is still struggling at the best of times, let alone during crisis events.

The intent of the recommendations below is therefore to show what is needed to build, develop and sustain the information accessibility sector in general. These general recommendations are made with the assumption that if the sector is well-resourced and has the appropriate infrastructure during non-crisis times, then it will also be better placed to act during a crisis as well. Where there are specific interactions of the general recommendations with a public health and disaster events context, these are highlighted.

Of note, Recommendations 1 and 2 apply to the whole information accessibility sector and should be read together. Recommendation 3 applies specifically to Easy Read and Easy English providers and can be considered separately.

Further, the recommendations align closely with ongoing policy developments in Australia. Recommendation 1 about introducing an explicit legal requirement for accessible information aligns with the Disability Royal Commission's recommendation for inclusion of information accessibility within their proposed Disability Rights Act. Recommendation 2 about resourcing the information accessibility sector builds a picture of what could be established in the future if information accessibility is further resourced under the Disability Services and Inclusion Act 2023. Elements described under these two recommendations, as well as under Recommendation 3 about providing clarity and infrastructure for 'easy' information, also provide ideas (with data) against some of the considerations that would need to go into establishing an Associated Plan on accessible information attached to Australia's Disability Strategy 2021-2031, as recommended by the Disability Royal Commission. As such, the perspectives and analysis provided here can help in the implementation of aspects already on the Australian disability policy agenda.

> **Recommendation 1**
>
> **Introduce an explicit legal requirement for accessible information**
>
> - Introduce an explicit legal requirement for accessible information, with guidelines attached and co-design and user testing specified.
> - Include responsibility by the sector/industry in which the information originates.
>   - This should include responsibility by public health and weather emergency/disaster response sectors.
> - Inform the guidelines with a dedicated piece of research into what accessible information products people with disability currently use and how they use them, which is conducted at a whole-of-sector level.
> - Include education mechanisms to support the policy change.

The policy change most commonly raised by the participant organisations was the need for the introduction of a legal requirement for accessible information. While accessible information is included as a right under the UNCRPD and enforceable under the Disability Discrimination Act 1992, there is not currently an explicit piece of national legislation directly and specifically requiring the production of accessible information, unambiguously outlining all the situations in which it must be provided, the formats which must be considered and specifying the standard of information necessary, including how information accessibility should sit together with access to information in Indigenous and community languages. The accessible information provider organisations who participated in the research argued that legislating this requirement would not only result in more accessible information being produced, but also improve the conditions for them in providing it.

> Obviously, legislating accessible information, including examples of various formats, would be a good thing… It's happened in the UK… in health[3] and the US[4]… there's actual legislation that mandates for different sectors to have information that is accessible (ORG_01).

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[3] The UK has implemented the Accessible Information Standard (DCB1605 Accessible Information) under section 250 of the Health and Social Care Act 2012.

[4] In the US, the Department of Justice published the Americans with Disabilities Act (ADA) Standards for Accessible Design in 2010.

> If [having accessible information] was a requirement, then that would change the landscape of how these things are done. It would change people's priorities. And it would also make the argument for more funding easier if it was a requirement on us to have these accessible [information products] for everything that we do (ORG_10).

The research participants recognised that there are different options for how to legislate the requirement for accessible information. One option is to include it in disability-specific legislation, such as a Disability Rights Act, as recently recommended by the Disability Royal Commission (DRC, 2023a), or another appropriate location. Such disability-specific legislation could have associated guidelines (recommendations based on best practice) about what is required for information to be accessible and high quality[5], and could also legally require some specific production elements, such as co-design and user testing of the information together with appropriately-qualified people with disability. The other option – not mutually exclusive, but possible in addition – is to encode information accessibility in other sectors' or industries' governing legislation, so that responsibility for accessible information is placed with and obvious to those who put out the original information. Several of the organisations who participated in the research liked this latter idea, because they felt that it would require more responsibility from individual sectors and industries – such as health and emergency services, but also other related areas like the financial sector, insurance sector and local government services – over accuracy of subject matter content.

> I actually think that what needs to happen is [responsibility for accessible information] needs to be built into other legislation. So if you've got legislation that governs, for example, how emergency frameworks happen, you need to build in accessibility into that… because then people are looking at the Act that regulates what they do [in their own sector or industry] and that has accessibility built into it. It's not kind of shoved off into some other piece of [disability-focused] legislation that they have to know about to go and look at to do it (ORG_11).

> So making it an expectation that [sectors will make their own accessible information]… so that we don't have to do it on areas that we're not actually skilled

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[5] After extensive review, the Disability Royal Commission recommended against establishing 'standards' (legally enforceable minimum requirements) for information accessibility (DRC, 2023). This is because standards need to be enforced, for which Australia does not currently have sufficient processes. As such, aligning with the Disability Royal Commission recommendation, the recommendation here notes that guidelines should be included, rather than standards.

in. You know, we're not doctors, so let's get the doctors to put out that information in an accessible format. It just should be a standard [action], not an addition (ORG_13).

In light of the focus of this report on accessible information in public health and disaster response situations, encoding accessible information responsibility more comprehensively into public health and disaster/emergency management legislation and associated implementation guidelines is particularly important for ensuring that the necessary outcomes are seen in these sectors. To be effective, the legislation and/or associated implementation guidelines in these sectors need to address some specific issues raised by the participants in this research (e.g. responsibility to directly provide verified information for translation into accessible formats and to have a designated point of contact for doing so; responsibility to provide subject matter expertise checks; clarification of baseline/core accessibility skills necessary and expected within specific industries; specification of settings requiring accessible information within different sectors, for instance, in hospitals, evacuation centres etc). As noted earlier in this report, the UN's Sendai Framework for Disaster Risk Reduction 2015-2030 and the Action Plans under Australia's National Disaster Risk Reduction Framework and Australia's Disability Strategy 2021-2031 all provide the impetus for information accessibility to be included in Australian disaster risk reduction efforts, yet the specific requirements for information to be accessible for people with disability could be more explicitly legislated/guided in this area[6].

Of note, it is important that any legislated requirement for accessible information is evidence-based. As such, the specifics of any guidelines associated with the requirement should be based on a dedicated piece of research into what accessible information products people with disability currently prefer to use, how they use them, why they choose to use particular products in particular ways, what products are most effective in what circumstances and how their information choices intersect with areas such as Indigenous

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[6] Relevant legislation, such as the National Emergency Management Declaration Act 2020, does not currently mention disability nor accessible information. Further, the Emergency Management Targeted Action Plan attached to Australia's Disability Strategy 2021-2031 outlines some responsibilities and actions related to information accessibility in particular Australian states/territories, but does not outline nationally consistent actions in this area, does not address resources for or ways of working with organisations who make accessible information and does not generally go into the level of detailed suggestions covered in this report.

and cultural/language background, education access, living situation and extent of service support. Such research would need to focus directly on the perspectives of people with disability, as well as meta-analyse data from published research.

Importantly, this research should be conducted at a whole-of-sector level by an impartial body. This would enable the research to address some sector-level complexities (e.g. navigating situations where one format is more commonly funded/recognised for people with a given type of disability than others; navigating situations where there may be multiple audiences for similar format types, but with different requirements – see later in this report for examples). A whole-of-sector evidence-base would be useful to give coordinated guidance that takes account of all possible formats, audience groups and stakeholder perspectives.

Finally, the organisations who participated in the research also noted the importance of education options to support the implementation of the legislation via a push for cultural change: "The challenge with… any legislation is… it's not going to get anywhere if you don't have the cultural will, and the education, to progress it" (ORG_11). Such education would include:

- **For those with responsibility for commissioning and procuring accessible information:** Education about the legislation itself and about background knowledge of accessibility, including education on:
  - which accessible formats should be used in particular circumstances;
  - the need for multiple format release, even if some formats appear to be similar or are for people with the same type of disability; and
  - the importance of matching the timelines of the accessible copies to the release of the standard version of the information.
- **For those with intersecting areas of work:** Education for those with intersecting areas of work (e.g. graphic design, communications, journalism) about baseline accessibility knowledge and requirements under the legislation.
- **For accessible information providers:** Education and capacity building through a community of practice for developing their industry in light of the legislation.
- **For people with disability:** Education to ensure they are aware of the legislation and of all the available resources for requesting information be made in accessible formats, including new digital options.
- **For industry and business:** Education to understand the benefits of accessible information and the situations in their industry in which it should be required.

- **For broader society:** Education to enable information and communication access to be thought of as an expected part of efforts towards inclusion.

The need for education options to support cultural change also highlights the point that any legislative solution to information accessibility needs to be coupled with additional resourcing, so that the requirement for accessible information can be realistically implemented. Legislating a requirement for accessible information without additional resourcing amounts to an unrealistic extra burden on provider organisations. The information accessibility sector's specific resourcing requirements, other than those for the education options noted above, are covered extensively in the following section.

Recommendation 2

Resource the information accessibility sector in an ongoing, informed/realistic and diversified way

- Provide a dedicated, ongoing resourcing stream for information accessibility work, with capacity for automatic expansion during public health and weather-related disaster events.
- Base the resource stream on an informed and realistic understanding of the sector's rates and requirements, including co-design and user testing.
- Diversify which businesses are engaged and funded.

Additional resourcing for the information accessibility sector was a high priority for almost all accessible information provider organisations who took part in the research. Importantly, they emphasised that it was not only that more funding was required – rather they also noted some important details in **how** it should be provided. These details are noted below. Importantly, the new Disability Services and Inclusion Act 2023 includes the legislative framework for funding for 'information supports and services' to be made available. This is important, as it means that the recommended actions below have a legislative framework for implementation.

One critical aspect for a large portion of accessible information provider organisations was that future resourcing and funding for the information accessibility sector needs to have an ongoing component. Currently, the information accessibility sector mostly operates from project-to-project via small grants and commissioned jobs. While it is realistic that accessible information provider organisations will continue to be paid from project-to-project by those commissioning accessible information products, the opportunity for at least some

dedicated, ongoing funding has important sector development implications. It would lead the way for more sustainability for provider organisations, better workforce retention, more professional development of staff and more of a guaranteed pipeline of work.

> We're really reliant on grants… So we need the government, especially at the federal level, to resource different organisations… [with] long-term sustainable funding. That's really what we need… if the government could commit to long-term sustainable funding (ORG_16).

> So to train someone to produce accessible formats can take… six-to-12 months, and often many years before they're very proficient. So we need to ensure that if we are going to invest in a staff member for that training, then we need to keep them. So staff retention is often difficult when we have big government contracts that are not extended, therefore we can't put staff on for an extended period of time (ORG_07).

> What would be absolutely fantastic would be to be able to have a consistent team that you had on your staff that would be constantly working on work – and you can guarantee that amount of work to people… When it's contract work, you never, you don't know when it's coming in, you can only draw people in when you need them, which is… not great for the continuance of skills and developing skills (ORG_04).

Importantly, resourcing the information accessibility sector in this ongoing way requires deeply understanding its scope and place as a defined sub-section of the broader disability sector and, then, its needs given its specific focus and organisational make-up. Firstly, this means recognising the value of information accessibility work within a context in which anything outside direct service provision related to the NDIS often struggles for attention in the current disability sector, even within funding schemes like the ILC. This situation sharpens the argument for information accessibility having its own dedicated resourcing.

> I think they're not really recognising how important [accessible information provider organisations] are for the [disability] sector as a whole… they talk a lot [in ILC funding] about developing the [disability] sector, but that just seems to focus on the NDIS part of it. And that that's quite narrow in terms of how many people with disabilities there are in Australia, but also, in terms of all the other services like ours… There's a lot of services… that provide ongoing support to people with disabilities that don't fit into that kind of narrow criteria that seemed to be getting funded (ORG_04).

The need for information accessibility to have its own resourcing is especially so given the importance of accessible information provider organisations being well-resourced enough to be able to expand their operations during public health crises and weather disasters. A beneficial feature of the resourcing stream would therefore be for it to automatically expand to a set and predictable amount of additional funding during public health crises or weather-related disaster events, as this would allow accessible information provider organisations to realistically and sustainably plan for increased operations during such times[7].

Importantly, the process of designing and calculating what the dedicated, ongoing resourcing stream would look like needs to be informed by a realistic understanding of the rates and requirements of good quality information accessibility work. This requires factoring in obvious and common considerations, such as increases in labour and material costs over time. However, it also requires factoring in specialised considerations, such as the realities of the costs of producing different accessible information formats:

> It's expensive to audio describe things, it's expensive to have websites Auslan interpreted, it's expensive to… [do] stuff in Easy English, if you're doing it properly (ORG_11).

> Interpreting is not cheap. Access is not cheap… it is just what it is… As an organisation, we spend a lot of time fighting for, yes, you do need two interpreters for WHS issues. Yes, I know it's expensive… This is what access looks like (ORG_12).

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[7] In making the recommendation for a specific information accessibility resourcing stream that automatically expands during times of public health crises or weather-related disasters, it is important to put this in context with DANA's recent recommendation for the establishment of a specific disaster funding stream for disability advocacy organisations (Desmarchelier & DANA, 2023). While these two resourcing streams are similar, they are also different and should co-exist. This is because (a) disaster-related disability advocacy work involves more than only producing accessible information and this other work also needs to be adequately funded, (b) information accessibility work needs to happen at all times, not only during disasters, and therefore needs a resourcing stream that exists outside disaster scenarios as well, and (c) information accessibility work is done by disability advocacy organisations, but also by others – such as specialist accessible information agencies – who also need to be able to access information accessibility resources outside an advocacy-focused funding stream.

> It's expensive to produce Braille. It's expensive to purchase, you know, CDs and record on to them and then distribute them (ORG_02)[8].

To produce high quality accessible information, it is also critical to factor in the costs of co-design and user testing. Particularly, although not exclusively, for formats such as Easy Read, Easy English and Auslan, inclusion of lived experience expertise via co-design and user testing is critical for accessible information to be accurate and useable:

> The consumer testing is a really important part of what we do… We would never want to produce something based on just what we think is right, without actually going over to people with lived experience and saying, "But what do you think?"… there's every time a learning that comes from that process (ORG_15)

While important, co-design and user testing process are expensive, with the requirement to factor in significant time for their processes, as well as fair and competitive payment to the people with disability involved. If an ongoing resourcing stream for information accessibility work is established, it is critical that realistic costs for these elements are included.

Finally, the accessible information provider organisations who took part in the research – who were often smaller providers, not necessarily the holders of large or ongoing accessible information contracts – also noted that there is a need to diversify the current state of play in terms of which businesses are engaged and funded. Despite recognition of the need to extend and grow the information accessibility sector in light of high (and increasing) demand for accessible information, these small provider organisations noted that it was hard for them to compete with the major players in their sector in competitive funding schemes and that, when they did make it in to business development streams such as Procurement Panels, even this did not ensure that work came their way:

> But the other thing that can make that tricky is when there are funding rounds that are out there… we've put an application in, but what we're finding is that we will

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[8] Another example, in addition to those in the quotes, is the differing costs, preparedness and time of Auslan translation, depending on context. Live Auslan translation takes some but less cost, preparedness and time than, for example, producing an Auslan video to be shared online – and even online Auslan videos have different cost, preparedness and time implications, depending on whether they are informal (e.g. to be shared on social media) or formalised (e.g. shared on a government website). Factoring in this kind of detailed consideration is another example of a way that the realities of the costs of different formats need to be acknowledged.

spend… hours and hours that we're putting into the applications, and then we're not successful, which is fine, you know, we're only new… But you find that all of the funding has gone to the major players who are national or they've been around for decades… Maybe there needs to be a sort of a stream that can come to people like us [who are smaller, newer businesses] (ORG_04).

I'm not quite sure how the whole procurement process works… I've been sitting on [a Procurement Panel]… and I could count on one hand, the number of requests for quotes that have come directly to me (ORG_18).

Taking all of these points into account, it is not only important that a dedicated, ongoing resourcing stream is provided for the information accessibility sector, but also that there are structures in place so that work can be evenly distributed between accessible information provider organisations, such that the sector as a whole can grow and develop. Greater capacity for the information accessibility sector as a whole will ensure that individual organisations are not over-burdened with too much extra work when public health crises and weather-related disasters happen. This is because it helps to ensure that at times of increased workload – such as public health crises and weather-related disasters – there are a greater number of established and well-resourced organisations in the sector to share the increased workload and requirement for provision of accessible information.

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Recommendation 3

Provide support to develop clarity and infrastructure for Easy Read and Easy English accessible information production

- Develop government-supported guidelines on Easy Read and Easy English formats, including clarity on terminology, guidance on places where providers commonly vary in their practices and quality control guidance.
- Invest in the development of a picture set (or sets) for 'easy' information which is shared, affordable, editable, culturally appropriate and customised to Australian demography and imagery, and which has capacity for Attribution-ShareAlike (CC BY-SA) creative commons licensing.
- Further explore potential sector buy-in for certification and accreditation of 'easy' information providers, with linked training.

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Within the broader project about the information accessibility sector as a whole, it was evident that the sub-section of the sector that creates Easy Read and Easy English

materials requires particular support. In this specific area, the focus is on a relatively newer product; there is a proliferation of new providers; the providers come from a range of different disciplinary areas (e.g. speech pathology, communications, editing/writing/ publishing, disability advocacy) and so have different approaches and focuses; and there is less formalised and/or standardised definition about what is required to make high-quality 'easy' information, as the evidence-base and accepted practices differ between different disciplines. It is also a part of the information accessibility sector which is currently more at the whim of the market, for example, being held to the pricing structures and licensing requirements of the private companies who have created particular picture sets, rather than having government-backed resourcing (such as where government supports the specific needs of other accessible information formats, such as the postage of bulky Braille materials through the Postal Concessions for the Blind Program). For these reasons, this report makes specific recommendations about how to support organisations who make 'easy' information.

Providers of 'easy' information very commonly called for the need for some formalised guidelines for their work, created to reflect the research evidence-base about 'easy' formats as well as consultation with the people who use the information, those who make it and other relevant stakeholders. Many saw that establishing such guidelines was a responsibility of government: "To a degree, it would need to have a connection to government to be enforceable" (ORG_17).

The purposes of these guidelines would be several-fold:

1. **Clarifying the terms 'Easy Read' and 'Easy English'.** Across the group of organisations who make 'easy' information, some organisations use the terms Easy Read and Easy English interchangeably, whereas others are firm that they signify two different formats. The lack of agreement on this matter and lack of consistent terminology reduces clarity of the products available from different providers; the organisations who participated in the research gave inconsistent definitions of what constitutes formats under these names (i.e. with reference to key features such as reading level, picture type, formatting). This is a situation that may be confusing for those who use the information, given that the audiences for Easy Read and Easy English are people who request 'easy' and straightforward phrasing. Establishing

consistent terminology – either Easy Read/Easy English or other terms[9] – is therefore important:

> It's obviously very confusing [that some providers make products called Easy Read and some make products called Easy English]. And I think it's further confused by the fact that we don't have accessible information guidelines in Australia, so we don't have firm definitions around them… Easy English and Easy Read basically mean the same thing to most people that we work with (ORG_17).

A critical role of the guidelines would therefore be to clarify the terms 'Easy Read' and 'Easy English' and what they should be understood to signify in the Australian 'easy' information marketplace. This would establish consistent terminology to be used by government and other groups in commissioning 'easy' information, and would create clarity for people with disability in what products they are using.

2. **Providing guidance for navigating the areas where 'easy' information providers commonly vary in their practices.** There are a few areas where organisations making 'easy' information commonly vary in their practices: primarily, the reading-level of the language used and the style of the pictures used – either photos (e.g. Photosymbols), dedicated symbols from picture sets developed through speech pathology (e.g. Compic, Boardmaker) or general graphics.

The organisations in the research adhering to different options on these areas all stated reasons for doing so that are aligned with obvious consumer engagement and investigation of the requirements of those using their products. Notably however, their reasons sometimes stood directly at odds with each other. For instance:

   a. A small number of organisations (n=2) described focusing on using language, phrasing and structuring that caters to people with very low literacy (Grade 1-2 reading level), with the focus being on maximising the amount of text that the people who use the information can read independently. A slightly larger number of other organisations (n=4) instead created documents at a Grade 6-

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[9] Depending on the result of the consultation to establish the guidelines, the guidelines could indicate clarity on what should be termed Easy Read and Easy English or may suggest other terms, e.g. Easy Info Level/Type 1 and Easy Info Level/Type 2.

9 reading level. They noted that their customer-base rarely reads information independently, no matter the reading level of the text, and that their 'easy' information is instead usually used with the assistance of supporters and often becomes a basis for guided discussion using simple phrasing. Therefore, it appears that they provide some additional content and slightly more complex terminology, on the basis that their information will not be read alone. This is perhaps so that more information is made available, but still in an 'easy' format, so that there is an opportunity to extend the vocabulary and conceptual understanding of those who use their products (e.g. through new terms being defined in easy language).

b. Organisations using photos of people with disability, particularly intellectual disability, in their documents (e.g. Photosymbols) stated that this helps the relatability of the information for this group, whereas others stated that having photos of people with intellectual disability in the information might make it less acceptable for other groups to use, such as Deaf people who may be seeking 'easy' written information to complement their use of Auslan or people who have low English literacy but do not identify as having an intellectual disability (e.g. people with disrupted education, people from non-English speaking backgrounds or people with other disabilities that affect literacy). Similarly, some organisations noted photography as a more mature and age-appropriate option for adults than the Compic or Boardmaker symbols that are often used with children. Yet those working with adults with complex communication needs noted that Compic or Boardmaker symbols are often literally the 'language' of adults who use some alternative and augmentative communication systems and therefore that there is real benefit to seeing them also included in the 'easy' information they access.

The direct contradictions that can be seen when aggregating the perspectives of the range of organisations who took part in this research suggest that there are multiple different user groups for 'easy' information formats. The range of possible users of 'easy' information has been recognised previously (both in the literature and in the data for this study), yet with a tendency to assume singular 'easy' information products can still nevertheless reach across and be used by multiple groups. In the current study, claims about additional user groups were sometimes evidenced with anecdotal accounts, rather than with findings from a systematic research evidence-base. In response and considering this study's dataset as a whole, the higher-order

analysis here suggests that a single option will not work for everyone. As such, having guidelines that identify the different possible user groups of 'easy' information – and that note that documents adhering to different features are required for each of them – is critical for making sure that the 'easy' information market, including all its different user groups, is adequately served.

3. **Identify quality control guidance for Australian 'easy' information.** In providing clarity on the elements above, the guidelines should also identify quality control guidance for the Australian 'easy' information market – for example, identifying minimum recommended elements of a quality document. As noted in the previous considerations profiled above, this might require identifying different preferable components based on the specific user group being served. In this respect, one component of the quality control guidance may be a preference that provider organisations accurately, and reasonably precisely, identify the specific user group of the 'easy' information in question and then cross-check the composition of their documents against the specific language, pictorial and other design requirements for that group. While this may inevitably mean that 'easy' formats cannot meet the very specific needs of every single user group every time, it may mean that products can be more accurately targeted based on their intended audience.

Beyond the need for guidelines, other elements are also required to properly set up the infrastructure for 'easy' information providers. As noted earlier, the picture sets that 'easy' information providers use – whether photos, symbols or graphics – often come with high ongoing licensing costs that cross-cut individual projects or the picture sets are blocked for use by copyright conditions:

> In order to use that [brand of pictures] in a commercial sense, we need to pay a license of $5,000 (ORG_13).

> All the NDIS icons… we're not allowed to use them**…** because the [National Disability Insurance] Agency own them or whoever the Agency contracted to develop them owns them. So like, theoretically, when I do an Easy English document where I'm talking about NDIS, I'm theoretically not even allowed to use the NDIS logo in there… [even if it] talks about what the NDIS is doing (ORG_09).

Even when provided at high cost, the images provided also often do not meet the provider organisation's requirements. Sometimes specialised content is missing (e.g. adequate

pictures for medical content) or the demographics of the pictures, which are almost all made in the US or UK, do not match Australian requirements:

> The images that are being used tend to come from overseas a lot of the time… so it's not actually depicting the demographics of people who live in Australia very accurately. So it would be really good to have more representation from our Australian context (ORG_13).

> From a local point of view, I'd love to do more Easy Read to help people with Aboriginal and Torres Strait Islander backgrounds and obviously, they're US symbols, so we don't have respectful images. If anything, we probably just … change skin tone… but it's very limiting… We want to talk about rural and remote, [but] their version of that's different to what I'd like to see (ORG_01).

Some participant organisations had had some prior experience of customising their picture sets, but this was not feasible to do continuously at scale, plus there are benefits for consistency of readers' understandings when a picture set can be shared across multiple organisations and information products:

> I think it would be great to have more options for image sets... At the moment, it's [Brand 1] or it's [Brand 2]… We actually worked with an external graphic designer to create sort of like a branded version of [Brand 2] images through that document, which came up looking fantastic. But it's quite a time-consuming process to do that and make sure that it's on brand but accessible at the same time…. So it would be good to have more options in terms of images (ORG_01).

> I think…if our government was able to provide us with a dictionary of images and the things that we need to make these documents… we [would] start to see consistency across all the areas of people sharing information (ORG_13).

As such, investment in an Australian 'easy' picture set (or sets) is necessary, preferably that is shared, affordable, editable, culturally appropriate and customised to Australian demography and imagery, and which has capacity for Attribution-ShareAlike (CC BY-SA) creative commons licensing, so that providers can edit and adapt the images. Given the licensing requirements, it would need investment from an Australian source, potentially either government or a private, for-purpose provider with a suitable business model to allow affordable images with the Attribution-ShareAlike (CC BY-SA) creative commons license option. It should be made together with the organisations who make 'easy' information, with the intention of providing a suitable range of alternative picture options that cover

conceptually consistent photos and graphics, and that are useable together with common picture sets, such as Photosymbols, Compic and Boardmaker.

Finally, some of participants in the research also noted the potential of having a certification and accreditation process for 'easy' information providers, with linked training. Those who mentioned this spoke about the importance of certification and accreditation both for quality control and for prompting avenues for better training options in their sector:

> I think having certification so that people are expected to produce their accessible information to a certain standard. And because of certification, we would then have more access or readily available access to training that can assist us to do that. You know, I see training being put out for taking your business online to make it digital, like why can't we have things like that available for making information accessible? (ORG_13).

Others noted that while there are existing short courses available in the Australian market for teaching Easy Read and Easy English skills, it is sometimes hard for small organisations or those in rural/remote areas to access them. Furthermore, in jurisdictions such as the UK – which have mandated accessible information in healthcare – there are more substantial training options available, that would be beneficial to implement in Australia as well:

> So I think it would be good to have a good sort of training program that allows some of the smaller organisations or people in rural, remote areas [to] make it into training… I think that it would be good to have capacity building to creep back into the space to be able to enable lots of different organisations to be able to produce good quality Easy Read for their customers (ORG_01).

> In terms of getting training for accessible information in Australia… If I want to get training in that, I could go… get a three-hour training course. And it's like I don't know if I'm now able to competently disseminate that information, because I participated, [but] I didn't even have to do a test to get that certification of participation. Where[as] the UK [organisation name], really, they're an awesome organisation. I just completed like a 10-week course in doing that information, and it was cheaper than [in Australia], as well as much more comprehensive. And I guess, I just really would love to have that kind of training available in Australia. Yeah, localize that training, so that we can develop communities of practice and stuff that is local to us (ORG_13).

As certification and accreditation (with linked training) was not raised by as many of the

participants as some of the other suggested changes, it is not yet clear the extent to which this approach would be supported by all 'easy' information providers. It may be that some see benefits to maintaining a degree of flexibility and of responsive or "grassroots" practice, outside of a set and professionalised certification and accreditation system. Further exploring potential sector buy-in for training, certification and accreditation is important and consultation should be undertaken on these areas. It may be that better training options have more support by themselves, without an associated certification and accreditation process.

Summary of recommendation elements related to public health and weather-related disasters

- If an overarching legal requirement for accessible information is introduced, it should include responsibility by the sector/industry in which the information originates, including public health and weather emergency/disaster response sectors. The legislation and/or associated implementation guidelines should address:
    - Responsibility to provide verified information for translation to accessible formats.
    - Responsibility to provide subject matter expertise checks.
    - Clarification of baseline/core accessibility skills necessary within specific industries.
- If an ongoing resourcing stream is introduced for the information accessibility sector, then it should include the capability to automatically expand to a set and predictable amount of additional funding during public health crises or weather-related disaster events. Set and predictable expansion would allow accessible information provider organisations to realistically and sustainably plan for increased operations during crises.
- More even distribution of production workloads between different accessible information provider organisations and support for the whole sector to grow and develop would help to ensure that individual organisations are not over-burdened with too much extra work when public health crises and weather-related disasters happen and the information requirements of people with disability inevitably increase.

10 Appendix

Some organisations gave permission for themselves to be named in a participant list. Please note that not all participant organisations are listed here, as some elected to remain anonymous.

- Access Easy English

- Australian Human Rights Commission

- Blind Citizens Australia

- Deaf Australia

- Deafness Forum Australia

- Easy Read Australia

- The Easy Read Toolbox

- The Growing Space

- IDEAS - Disability Information Education & Awareness Services

- Inclusion Australia

- Queensland Advocacy for Inclusion

- Speak Out Advocacy – Tasmania

- Two Way Street

- VALID

- Vision Australia

- Women with Disabilities Australia

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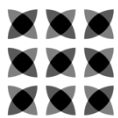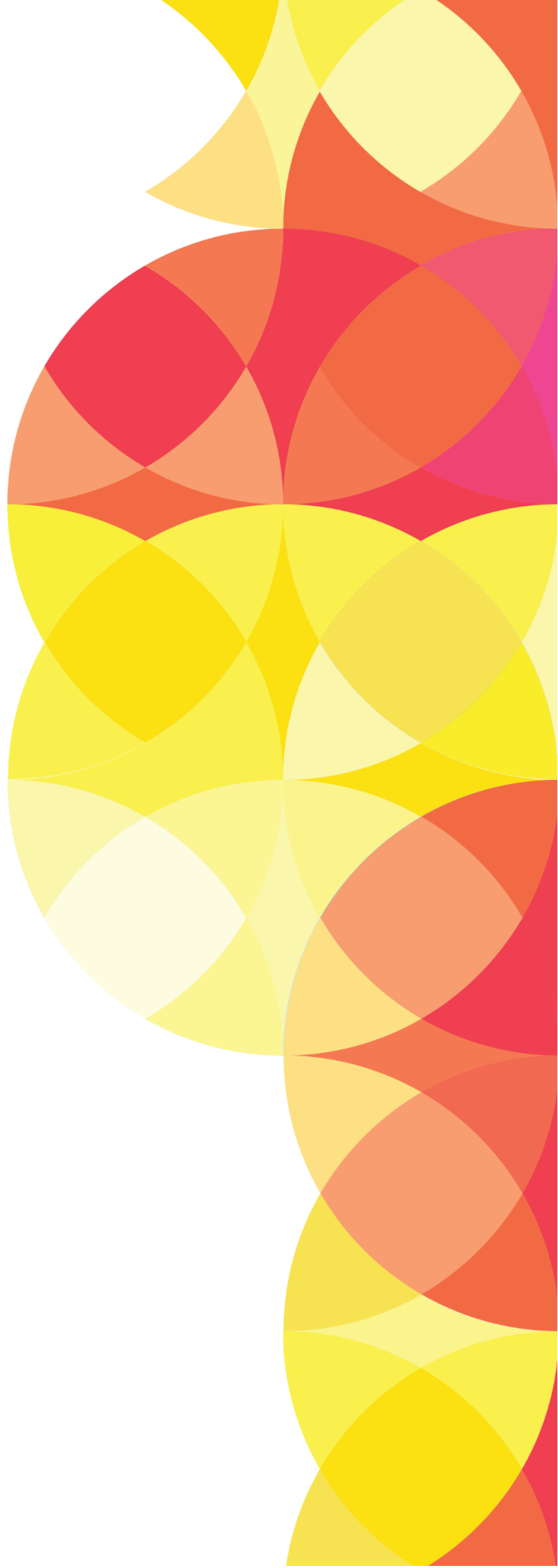
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