



Attention: Edward Santow  
Australian Human Rights Commission  
Level 3, 175 Pitt Street  
Sydney NSW 2000

30 October 2018

## **Technology & Human Rights Issues Paper**

- Dear Edward,

Thank you for the opportunity to make a submission in relation to the AHRC Issues Paper, *Technology and Human Rights*.

ANZ has a long standing commitment to greater accessibility, for its customers, staff and the community. We have had an Accessibility Plan for more than 10 years (published to the AHRCs website), and we have made steady progress around many goals, including increasing employment opportunities, lifting disclosure rates, and initiatives like the first Australian debit/credit cards with tactile features. These are complementary to the gradually increasing range of bank notes with tactile features being rolled out by the RBA- noting the new \$50 launched just recently. These features are now universal across ANZ's card range, and are being extended to our New Zealand cards, eventually reaching several million customers. All our ATMS are now audio enabled and include tactile features, and we have focused a lot of effort in recent years to make the customer experience in our branches a better and more dignified one, following the Design with Dignity Guidelines.

- At the Melbourne Roundtable, we discussed digital banking channels. ANZ has done a lot of work in recent years to ensure the apps that we build successfully leverage the accessibility features which sit on smartphone operating systems (like Apple), and this has brought great benefits to customers with vision and other impairments who rely on voice over technology, as they can now have transaction balance and receipts read out to them rather than relying on another person to do this. However, the role of gatekeeping is important- the Apple or Android app stores do not themselves set any accessibility requirements, so it is up to app developers to be aware of and meet best practice in this regard. There is a need to raise more awareness of this.

Pin on Glass (POG) devices represent a different challenge. Whether proprietary, or COTS (Commercial Off the Shelf), the issue is with the physical hardware. If the design specification does not include accessibility, then it is very difficult, time consuming and costly to address this at a later stage. POG was an important topic for the banking sector in the recent consultation to develop new Accessibility Principles, led by the Australian Bankers Association. Even though that consultation has now closed, and the Principles have been endorsed, this issue remained as outstanding, and the sector continues to work on this. Touchscreen is becoming ubiquitous (building concierge screens, shopping centre directories, supermarket check outs, even photocopiers) so this is a really critical development offering both convenience but also the potential to lock people out of services which they could previously do easily and independently, if there is not an acceptable workaround.

In recent months, many of the banks (including ANZ) have joined a new working group to try to collaborate on a common approach, as it is recognised that if different financial institutions come up with different design approaches, this will be complex and inconvenient for customers. For example, different haptics, screen layout or gestures in the device to ensure they are accessible. The working group is being convened by the Australian Payments Network, and the aim is to produce a Standard. I understand representatives from the disability sector will be engaged in due course for their feedback. APN is primarily focused on security standards for payment devices, so it is unclear whether it is best placed to be the gatekeeper for an accessibility standard, but these issues will be progressed through the discussions.

Should the government regulate in this area? This is difficult to answer, as there is a real tension between the likely pace of regulation and the speed of technological and market development in this area. The banks are not the only players in this space of course, there are many BYOD (bring your own device) options also which may not be accessible. How are these to be regulated? We have been advised that there is no perfect 'example' internationally, and indeed that the UK is looking closely at the Australian experience.

Other issues which we are thinking about include the benefits of accessible content (video in particular). Providing captions will mean many people will access your content (I understand that 85% of Facebook videos are watched with the captions switched on, this is by no means limited to people with hearing impairment), but there is still a lot of content made without captions or transcripts. We continue to raise awareness about this at ANZ. What may be beneficial is a government campaign around an issue like this to promote awareness and change behaviour- as it would really shine a light on the fact that if you build for accessibility, there are benefits for everyone.

Greater progress towards accessibility would also benefit from it being a core part of university curricula (STEM in particular) so when a person enters the workforce they understand the issues and barriers, and what role they might be able to play in the solutions. In my observation, awareness of accessibility is very low in Australia, and arguably this may well be exacerbated by our education systems not always being inclusive of people with disability, which then means our workforce is not very disability confident, and does not consider universal design in many fields. This can be a vicious cycle.

Finally, the Australian government has adopted a new procurement standard around accessible IT. The next step to drive up compliance with these standards across Australian industries may be to require major suppliers to government departments (including banking services) to meet this standard in their own business. ANZ has been working towards compliance with these type of standards for some time, but this could really propel things forward for many organisations.

Your sincerely,

Meg Dalling  
Head of Accessibility