



16 October 2018

Mr Edward Santow
Human Rights Commissioner
Australian Human Rights Commission
GPO Box 5218
SYDNEY NSW 2001

By email: tech@humanrights.gov.au

Dear Commissioner,

SUBMISSION TO THE HUMAN RIGHTS AND TECHNOLOGY PROJECT

Kingsford Legal Centre (**KLC**) welcomes the opportunity to make a submission to the Australian Human Rights Commission's project on human rights and technology.

About Kingsford Legal Centre

KLC is a community legal centre that has been providing legal advice and advocacy to people in the Randwick and Botany Local Government areas since 1981. KLC provides general advice on a wide range of legal issues, and undertakes casework for clients, most of whom would be unable to afford a lawyer without our assistance. In 2017, KLC provided advice to 1,594 individuals and provided minor or substantial legal assistance in 286 matters.

KLC also has a specialist employment law service, a specialist discrimination law service (NSW wide) and an Aboriginal Access Program. In addition to this work, KLC undertakes law reform and policy work in areas where the operation and effectiveness of the law can be improved.

Our clients

Of the clients that KLC advised in 2017, 56.3% stated they had no income or were low income earners and 27% of clients advised that the main language spoken at home was not English, with many speaking little or no English. Furthermore, 6.4% of our clients identified as being either Aboriginal or Torres Strait Islander and 24.5% of clients had a disability.

Our submission

New technologies present both opportunities to protect human rights and threats to human rights. While new technologies have the potential to have a transformative effect on access to justice for disadvantaged groups, if the needs of these groups are not considered in the design of new technologies, the risk of entrenched discrimination perpetuated by new technologies arises.

Technology companies that pride themselves on innovation and ‘disruptive technologies’ often rally behind the motto of ‘move fast and break things.’¹ This approach, combined with the concerning issue of workforce diversity in Silicon Valley, threatens a human rights approach to technology. A systemic lack of diversity and unconscious bias may lead to a lack of due consideration of key issues such as equity and respect for human rights in the design of technologies.

This submission focuses on issues that affect our clients and community. Accordingly, we have addressed the following consultation questions:

1. What types of technology raise human rights concerns? Which human rights are particularly implicated?
2. Noting that groups within the Australian community can experience new technology differently, what are the key issues regarding new technologies for these groups of people (such as, children and young people; older people; women and girls; LGBTI people; people of culturally and linguistically diverse backgrounds; Aboriginal and Torres Strait Islander peoples)?

¹ Alex Fattal, ‘Facebook: Corporate Hackers, a Billion Users and the Geopolitics of the “Social Graph”’ (2012) 85(3) *Anthropological Quarterly* 927-956, 940.

3. How should Australian law protect human rights in the development, use and application of new technologies?
8. What opportunities and challenges currently exist for people with disability accessing technology?
9. What should be the Australian Government's strategy in promoting accessible technology for people with disability? In particular, what, if any, changes to Australian law are needed to ensure new technology is accessible?

Summary of recommendations

KLC recommends that:

1. The federal government develop clear guidelines for the development of new technologies. These guidelines should:

- require that systems be built in a way that can be verified, through requiring evidence that systems are operating correctly and within the bounds of the law, including compliance with federal anti-discrimination law and privacy law; and
- introduce principles of privacy by design and data protection by design.

2. The government introduce a new tort for serious invasions of privacy.
3. NSW laws should be reformed to explicitly include technology-facilitated domestic/family violence as an offence;
4. The NSW and federal governments should proactively consider and address technology-facilitated abuse in domestic/family violence strategies; and
5. Governments should provide adequate funding for technology that assists in protection against domestic/family violence.
6. Federal and state governments should introduce strategies and programs to increase digital inclusion for Aboriginal and Torres Strait Islander people, particularly in remote areas. This should include funding access to the internet.
7. The government should promote Indigenous data sovereignty through collaborating with Aboriginal and Torres Strait Islander communities and their peak bodies in the design, collection, dissemination and ownership of data. All data should only be collected and used with informed consent.

8. Government services should integrate digital platform-based government services with a face to face interaction option for consumers, for example Centrelink's Multicultural Service Officer program.
9. Government websites should use simple and consistent symbols and icons to indicate translated materials and develop interactive technologies to improve the experience for non-English speakers.
10. The Federal Government should enact a Human Rights Act.
11. The Attorney-General should exercise the power in section 31 of the *Disability Discrimination Act 1992* (Cth) to create a binding standard for accessibility of online information and services.

1. What types of technology raise particular human rights concerns? Which human rights are particularly implicated?

New technologies are likely to have an impact on the enjoyment of fundamental human rights. The human rights which we have focused on in this submission include:

1. ***The right to privacy*** - Article 17 of the International Covenant on Civil and Political Rights (ICCPR), of which Australia is a signatory, states “no one shall be subjected to arbitrary or unlawful interference with his privacy...” and requires governments to enact laws to give persons protection against such interference.²
2. ***The right to non-discrimination and equality*** – Articles 2 and 26 of the ICCPR and article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) provide the right to non-discrimination and equality.
3. ***The right to freedom from violence*** – Violence impairs the enjoyment of fundamental rights and freedoms including the right to life,³ the right to not be subject torture or to cruel, inhuman or degrading treatment or punishment,⁴ the right to liberty and security of person,⁵ the right to equal protection under the law,⁶ and the right to the highest standard

² *International Covenant on Civil and Political Rights* (ICCPR), opened for signature 16 December 1966, 999 UNTS 171 (entered into force 23 March 1976), art 17.

³ *Ibid* art 6.

⁴ *Ibid* art 7.

⁵ *Ibid* art 9.

⁶ *Ibid* art 26.

attainable of physical and mental health.⁷ Article 1 of the Convention on the Elimination of All Forms of Discrimination Against Women prohibits discrimination against women, which includes gender-based violence.⁸

4. ***Rights of people with disability*** – Under the Convention on the Rights of Persons with Disabilities (CRPD), Australia has obligations to ensure and promote the full realization of all human rights for all people with disability without discrimination. Australia must promote the availability and use of new technologies at an affordable cost for people with disability and consider the protection and promotion of human rights of people with disability in all policies and programmes.⁹

While human rights protections are set out in various treaties, these treaties were drafted before the internet and associated technologies were central to our daily lives. The environment in which businesses and the government operate has changed significantly since then and there are numerous challenges that must be addressed – in particular, the grey area that these technologies operate in. Australia needs to set out clear principles for the interaction between human rights and technology, in order to ensure the promotion and protection of these fundamental human rights.

The following types of technology raise particular human rights concerns:

(i) Big data analytics

The extensive collection, storage, analysis, and use of an individual's personal data raises numerous human rights concerns. The first concern is the right to privacy. The extensive collection of data by organisations to build profiles on individuals and make inferences and predictions based on their online behaviour severely limits the private space afforded to individuals in the digital age. The right to privacy is of vital importance to the preservation of individual autonomy. Without privacy, individuals may not be willing to express themselves for fear of reprisal. The right to privacy necessarily extends to the rights to freedom of expression, freedom of association, and equal treatment.

⁷ *International Covenant on Economic, Social and Cultural Rights* (ICESCR), opened for signature 16 December 1966, 9993 UNTS 3 (entered into force 10 March 1976), art 12.

⁸ Committee on the Elimination of Discrimination Against Women, *General Recommendation No. 19: Violence Against Women*, 11th Session (1992).

⁹ *Convention on the Rights of Persons with Disabilities* (CRPD), opened for signature 30 March 2007, 2515 UNTS 3 (entered into force 3 May 2008) art 4.

Data may also have significant human rights implications to the extent that it is used in decision making processes. There are many examples where the use of predictive analytics based on personal information may affect an individual's human rights, such as data informed decisions regarding access to health insurance, credit, and employment, resulting in direct discrimination. Indirect discrimination may also occur when relying on an algorithm that does not take into account human rights obligations and may further entrench social inequality and disadvantage.

(ii) AI-informed decision making

AI-informed decision making has the potential to further entrench inequality and discrimination. AI systems require human input in their creation and development and may duplicate the biases of those that have created them.¹⁰ For AI systems to make predictions that guide decision making, for example hiring decisions, it is imperative that the technology is understood and audited for discriminatory bias. Protected attributes such as age, race and sex may be identified by the AI system as predictors of an employee's future performance and therefore reliance on this system will lead to discrimination in hiring decisions.¹¹

Another concern is that AI systems are 'black boxes' – that is, that AI systems are opaque, and it is not possible to understand their decision processes. Indeed, machine learning systems may be inscrutable, and it is difficult to explain what the system is doing and why.¹² Therefore, the ability of AI systems to meet the principles of transparency and accountability may be limited. There does, however, remain the possibility of computer science's own version of technical accountability.¹³

An example of AI-informed decision making that had a significant adverse impact on disadvantaged people, including people with disability, carers, single mothers and older persons is the Centrelink automated debt recovery program,

¹⁰ David Lehr and Paul Ohm, 'Playing with the Data: What Legal Scholars Should Learn About Machine Learning' (2017) *University of California Davis Law Review* 653, 668.

¹¹ See Pauline T Kim, 'Auditing Algorithms for Discrimination' (2017) 166 *University of Pennsylvania Law Review Online* 189.

¹² Deven R. Desai and Joshua A. Kroll, 'Trust But Verify: A Guide to Algorithms and the Law' (2018) 31(1) *Harvard Journal of Law & Technology* 1.

¹³ *Ibid.*

RoboDebt. The program used data-matching to automatically match data held by the Australian Tax Office with clients' reported earnings to Centrelink and raised discrepancies. About 29,000 of the 165, 000 debts raised through the RoboDebt program were either wiped to zero, revised partially or revised upwards, indicating the widespread nature of incorrect results of the data-matching, which had no human oversight.¹⁴ Clients who received the incorrect debt notices experienced significant distress as a result. Such programs raise procedural fairness concerns and have the potential to breach the right to social security.

Recommendation 1

KLC recommends that:

The federal government develop clear guidelines for the development of new technologies. These guidelines should:

- Require that systems be built in a way that can be verified, through requiring evidence that systems are operating correctly and within the bounds of the law,¹⁵ including compliance with federal anti-discrimination law and privacy law; and
- introduce principles of privacy by design and data protection by design.

2. Key issues for groups in Australia

In KLC's work we constantly see the impacts of inequality and discrimination on members of our community. Many of the people we work with face multiple and intersecting disadvantage because of entrenched exclusion, unfair treatment and unequal distribution of resources. As the role of new technologies in our daily lives and in interaction with government increases, it is essential that we monitor and protect against the ways in which technological advances reinforce disadvantage and exclusion.

The fundamental issue posed by new technologies on disadvantaged groups is accessibility. As access to technology becomes increasingly important for participation in society, there is a risk of a widening digital divide that will increase the inequality experienced by groups that are already disadvantaged.

¹⁴ Christopher Knaus, 'Centrelink forced to wipe or change one in six robo-debts', *The Guardian*, 14 February 2018 <<https://www.theguardian.com/australia-news/2018/feb/14/centrelink-forced-to-wipe-or-reduce-one-in-six-robo-debts>>.

¹⁵ Above n 12, 64.

Australia's data inclusion score is currently 60.2.¹⁶ In general, Australians with lower income, education and employment are less digitally included.¹⁷

The interests and needs of particular groups of people must be considered from the beginning of the design process - they should not be an afterthought. In KLC's experience, the following groups of people face specific difficulties caused or enhanced by digital technology. We recognise that many diverse groups are impacted by new technologies and encourage the Australian Human Rights Commission to consult with all affected groups.

People with disability

New technologies present a valuable opportunity to increase the participation of people with disability in society and increase access to justice. These new technologies must be developed in consultation with people with a disability to ensure accessibility. People with disability have a low level of digital inclusion, with a digital inclusion score of 49.2, a significant 11 points below the national average.¹⁸ The digital inclusion gap between Australians with disability and Australians without disability is growing.¹⁹

People with disability may require various adjustments in order to participate in society, including to access and benefit from new technologies. People with a disability are already the most legally vulnerable group in Australia²⁰ and it is imperative that technology facilitates, rather than diminishes, access to services.

Case study - Rochelle

Rochelle wanted to buy tickets for a concert through Ticketek and required accessible seating for wheelchairs for her family members. Accessible seating

¹⁶ Julian Thomas, Jo Barraket, Chris K Wilson, Kay Cook, Yee Man Louie, Indigo Holcombe-James, Scott Ewing and T MacDonald, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2018* (2018) <<https://digitalinclusionindex.org.au/wp-content/uploads/2018/08/Australian-digital-inclusion-index-2018.pdf>>.

¹⁷ Ibid 6.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Christine Coumarelos, Deborah Macourt, Julie People, Hugh M McDonald, Zhigang Wei, Reiny Iriana and Stephanie Ramsey, *Legal Australia-Wide Survey: Legal Need in Australia* (2012) <[http://www.lawfoundation.net.au/ljf/site/templates/LAW_AUS/\\$file/LAW_Survey_Australia.pdf](http://www.lawfoundation.net.au/ljf/site/templates/LAW_AUS/$file/LAW_Survey_Australia.pdf)>.

couldn't be booked online, so Rochelle had to call the congested hotline which was only open during business hours. The public could access 24-hour online booking facilities and an iPhone app, which people needing accessible seating could not use. Rochelle was unable to get tickets as they sold out before she got through on the hotline.

See also questions 8 and 9 below.

Domestic/family violence survivors

Use of technology for non-consensual sharing of intimate images

There has been a notable increase in the use of technology to facilitate the sharing of intimate images without consent to threaten, harass or embarrass victims. This behaviour can cause victims to live in extreme fear and generate long-term mental health and employment problems.²¹ Violence against women is endemic in Australia, with 1 in 3 women experiencing physical violence and almost 1 in 5 women experiencing sexual violence.²²

KLC has supported the introduction of criminal laws in NSW to address the problem of non-consensual sharing of intimate images, which occurred with the passage of the *Crimes Amendment (Intimate Images) Act 2017 (NSW)* in June 2017. KLC also supported the introduction of a new cause of action in tort for serious invasions of privacy at the Commonwealth level.

Recommendation 2

KLC recommends that:

- the government introduce a new tort for serious invasions of privacy.

Technology-facilitated domestic/family violence

²¹ Kingsford Legal Centre, *Response to NSW Department of Justice Discussion Paper on the sharing of intimate images without consent* (21 October 2016) <<http://www.klc.unsw.edu.au/sites/klc.unsw.edu.au/files/Sharing%20images%20submission-%20final.pdf>>.

²² Peta Cox, 'Horizons Research Report - Violence against Women: Additional Analysis of the Australian Bureau of Statistics' Personal Safety Survey 2012' (Report Issue 1, Australia's National Research Organisation for Women's Safety, 2015); D Woodlock et al, 'Voices against Violence Paper One: Summary report and Recommendations' (2014, Women with Disabilities Victoria, Office of the Public Advocate and Domestic Violence Resource Centre Victoria).

The use of technology by perpetrators of domestic/family violence to stalk, harass, threaten and otherwise exercise power and control has been occurring for many years. Perpetrators of domestic violence may have access to programs, which allow them to track victims to find them after an escape or use messaging services to harass and intimidate a victim.

The United Nations Committee on the Elimination of Discrimination Against Women has recognised the role of technology in gender-based violence against women, including domestic and family violence. The Committee recommends that data collection on gender-based violence against women include data on technology-mediated violence. The Committee has also noted the increasingly borderless nature of violence, as perpetrators can track and contact victims, even if they are in a different state or country.²³

Some aspects of technology-facilitated violence are covered by existing domestic violence legislation. For example, the term 'intimidation'²⁴ is defined in part as "an approach made to the person by any means," which is understood to include approaches made by phone, e-mail and text message.

At present, there is limited consideration of technology-facilitated abuse in government policies and strategies to address domestic/family violence.²⁵ Current methods of dealing with technological abuse revolve around recommending victims stay away from their online networks and communication devices,²⁶ which is clearly an inadequate response to this problem.

Conversely, there are reports of technology being used to assist victims of domestic violence to seek help or record incidents of violence or breach of an

²³ Committee on the Elimination of Discrimination Against Women, *General Recommendation No. 35 on gender-based violence against women, updating general recommendation No. 19*, UN Doc CEDAW/C/GC/35 (14 July 2017).

²⁴ *Crimes (Domestic and Personal Violence) Act 2007* (NSW), section 7.

²⁵ Hadeel Al-Aloisi, 'Technology-facilitated abuse: the new breed of domestic violence', *The Conversation*, 27 March 2017 <<https://theconversation.com/technology-facilitated-abuse-the-new-breed-of-domestic-violence-74683>>.

²⁶ *Ibid.*

Apprehended Violence Order.²⁷ While technology will not solve underlying causes of violence, funding should be provided to enable victims to use technology for their protection.

Recommendations 3-5

KLC recommends that:

- NSW laws should be reformed to explicitly include technology-facilitated domestic/family violence as an offence;
- The NSW and federal governments should proactively consider and address technology-facilitated abuse in domestic/family violence strategies; and
- Governments should provide adequate funding for technology that assists in protection against domestic/family violence.

Aboriginal and Torres Strait Islander people

Aboriginal and Torres Strait Islander people have low digital inclusion. The Australian Digital Inclusion Access found:

“Indigenous Australians living in urban and regional areas also have low digital inclusion (54.4, or 5.8 points below the national average) ...the largest gap is in affordability, where the score for Indigenous Australians (49.7) is 7.9 points below the national average (57.6). The prevalence of mobile-only connectivity amongst Indigenous Australians which carry higher costs per gigabyte than fixed connections contributes to this Affordability result. In 2018, the ADII team conducted a targeted digital inclusion survey in the remote Indigenous community of Ali Curung. The findings of this survey suggest that remoteness further diminishes digital inclusion for Indigenous Australians, particularly with regards to Access and Affordability.”²⁸

Maintaining Indigenous data sovereignty, that is, maintaining ownership, access, control, and possession of data by Aboriginal and Torres Strait Islander peoples is inextricably linked with the right to self-determination. Self-determination includes the right to have data and information collected by or in collaboration with Aboriginal and Torres Strait Islander peoples in a way that

²⁷Hadeel Al-Aloisi, ‘Technology is both a weapon and a shield for those experiencing domestic violence’, *The Conversation*, 18 June 2018, < <https://theconversation.com/technology-is-both-a-weapon-and-a-shield-for-those-experiencing-domestic-violence-97776>>.

²⁸ Above n 16, 6.

reflects their reality- both past and present.²⁹ Collecting data in this way will help build a solid foundation for self-determined economic, cultural and social development.³⁰ This approach will also ensure that the collection of data is done in a way that allows Aboriginal and Torres Strait Islander peoples to opt out of being a statistic if they so desire. The data collection framework should not just measure the disadvantage experienced by Aboriginal and Torres Strait Islander peoples and the gap with the non-Indigenous population, but also incorporate 'strength-based reporting'.³¹ Strength-based reporting will facilitate recognition of Aboriginal and Torres Strait Islander peoples' diverse cultures and traditions to ensure they are preserved.

Recommendations 6 and 7

KLC recommends that:

- Federal and state governments should introduce strategies and programs to increase digital inclusion for Aboriginal and Torres Strait Islander people, particularly in remote areas. This should include funding access to the internet.
- The Government should promote indigenous data sovereignty through collaborating with Aboriginal and Torres Strait Islander communities and their peak bodies in the design, collection, dissemination and ownership of data. All data should only be collected and used with informed consent.

Culturally and Linguistically Diverse People

The 2016 Census showed that over 33 per cent of Australia's population was born overseas and almost half (49%) had at least one parent born overseas.³² 21% of Australians spoke a language other than English at home.³³ The push to move government service delivery online and the speed of reforms mean accessibility issues remain significant for CALD Australians, preventing access to government services and participation in economic and cultural life.³⁴

²⁹Tahu Kukutai and John Taylor (eds), *Indigenous Data Sovereignty: Toward an Agenda* (Australian National University Press 2016) xxii.

³⁰ Ibid.

³¹ Ibid, 288.

³² Australian Bureau of Statistics, 'Census reveals a fast changing, culturally diverse nation' (Media Release, 073/2017, 27 June 2017)

<<http://www.abs.gov.au/ausstats/abs@.nsf/lookup/Media%20Release3>>.

³³ Ibid.

The UN High Commissioner for Human Rights has stated the use of a minority language as a language of service results in more effective delivery of public services.³⁵ Catering for the language needs of all migrants is imperative to ensure equitable access and overall wellbeing.

Recommendations 8 and 9

KLC recommends that:

- Government services should integrate digital platform-based government services with a face to face interaction option for consumers, for example Centrelink's Multicultural Service Officer program.
- Government websites should use simple and consistent symbols and icons to indicate translated materials and develop interactive technologies to improve the experience for non-English speakers.

3. How should Australian law protect human rights in the development, use and application of new technologies?

Australia is party to the key international human rights conventions and has an obligation to adopt laws and other measures to give effect to the human rights enshrined in these treaties through domestic law. However, Australia is yet to give comprehensive protection to human rights in domestic law. Currently, human rights in Australia are protected through a myriad of federal, state and territory laws, policies and practices, and through the common law.

The current legal framework makes it difficult for people in our community to identify their rights and freedoms, and to understand the extent to which their rights are recognised at law. The complex interactions of the various sources of law also make it difficult to concisely articulate how these legal rights work. This hinders the promotion of respect for fundamental human rights. KLC believes that it would assist ordinary Australians' understanding of their rights and responsibilities to set these out in one single document.

³⁴ Federation of Ethnic Communities' Councils of Australia, *Digital Access and Equity for Multicultural Communities* (2016) <<http://fecca.org.au/wp-content/uploads/2017/01/feccadigitalconsultationreport.pdf>>.

³⁵ UN Office of High Commissioner on Human Rights, *Language Rights of Linguistic Minorities: A Practical Guide for Implementation* (2017), 7 <https://www.ohchr.org/Documents/Issues/Minorities/SR/LanguageRightsLinguisticMinorities_EN.pdf>.

Moreover, Australian law currently adopts a bottom-up approach, addressing the protection of each right individually. This is an unsatisfactory approach in which some fundamental rights are adequately protected whilst others are not protected at all. KLC believes that this creates too much ambiguity and leaves too many gaps. KLC recommends that the most appropriate way to ensure human rights are protected and promoted, in the context of new technologies under Australian law, is for the enactment of a national human rights act.

Enacting a national human rights act would allow more concise classification and better protection of human rights and freedoms. This Act would address the rights impacted by technology, including but not limited to, the right to privacy, the right to non-discrimination and equality, and the right to freedom from violence.

Additionally, we note that there is broad support for a national Human Rights Act. The National Human Rights Consultation in 2009 found that the majority of those attending community roundtables favoured a Human Rights Act, and 87% of those who presented submissions to the Committee expressing a view on the question were in support of such an Act.

Recommendation 10

The Federal Government should enact a Human Rights Act.

Questions 8 and 9: Accessible technology for people with disability

Case study - Mayuri

Mayuri is legally blind. She applied for a working with children check for her work as a childcare worker. As part of the application process, the government agency provided Mayuri with documents in PDF format. Mayuri uses computer software to read documents. The software is unable to read the documents in PDF format. Mayuri made numerous requests for the words from the PDF to be pasted into an e-mail or another accessible format such as Word. This was refused by a government officer due to concerns over the lack of the delegate's signature and the effect this would have on its legitimacy.

When Mayuri's case was considered in light of submissions from KLC, the government agency changed its practice to provide documentation in convertible format to assist applicants who are vision impaired. The agency team has received training and support about how to convert documents and understand this option is now available and must be used.

As the above case study shows, people with disability still face barriers to accessing technology that has been around for many years. There are many ways in which new technologies can entrench discrimination and exclusion.

Australian governments have taken steps to ensure accessibility of their websites for people with disability in line with the international Web Content Accessibility Guidelines (WCAG) 2.0, which were created by the World Wide Web Consortium in 2008.³⁶ All federal government websites were required to meet WCAG 2.0 standards by the end of 2014³⁷ under the National Transition Strategy. Most state governments have mandatory WCAG 2.0 standard.³⁸

Although the *Disability Discrimination Act 1992* (Cth) ('DDA') provides protection against discrimination on the basis of disability in the provision of goods, services and facilities, and the administration of Commonwealth programs, the reactive nature of the complaints system means that it is difficult to address inaccessible technologies once they have already been made available to the market.

KLC supports the introduction of binding disability standards for technology under section 31 of the DDA. These standards should be developed in consultation with people with disability and their peak organisations, and should require co-design of technology, and minimum standards of accessibility for people with disability.

Recommendation 11

KLC recommends that:

The Attorney-General should exercise the power in section 31 of the *Disability Discrimination Act 1992* (Cth) to create a binding standard for accessibility of online information and services.

If you wish to discuss our submission, please contact us at legal@unsw.edu.au or on (02) 9385 9566.

Yours faithfully,
KINGSFORD LEGAL CENTRE

³⁶ Media Access Australia, *State and Territory Adoption of WCAG 2.0* <<https://mediaaccess.org.au/research-policy/australian-governments-access-policies/state-and-territory-adoption-of-wcag-20>>.

³⁷ Australian Government Information Management Office, *Web Accessibility National Transition Strategy* (June 2010) <<https://www.finance.gov.au/publications/wcag-2-implementation/docs/wcag-transition-strategy.pdf>>.

³⁸ Above n 33.



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