



WWDA has Special Consultative Status with the Economic and Social Council of the United Nations

Winner, National Human Rights Award 2001
Winner, National Violence Prevention Award 1999
Winner, Tasmanian Women's Safety Award 2008
Certificate of Merit, Australian Crime & Violence Prevention Awards 2008
Nominee, National Disability Awards 2017
Nominee, French Republic's Human Rights Prize 2003
Nominee, UN Millennium Peace Prize for Women 2000
Nominee, UNESCO Prize for Digital Empowerment of Persons with Disabilities 2021

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Senator the Hon Anne Ruston
Minister for Families and Social Services
PO Box 6100
Senate
Parliament House
CANBERRA ACT 2600
Via Email: senator.ruston@aph.gov.au

12 March 2021

Dear Minister Ruston,

Women With Disabilities Australia (WWDA) would like to congratulate you on the launch, on International Women's Day (IWD2021), of the third phase of the national '*Stop it at the Start*' campaign.

WWDA supports and welcomes all initiatives that ensure that women and their children can live a life free from all forms of violence, and we welcome the continued commitment from Commonwealth, State and Territory governments which recognise that violence against women remains a national emergency.

As the only national Organisation of Persons with Disabilities (OPD) for women, girls, feminine identifying and non-binary people with disability, we would like to take this opportunity to raise some observations and concerns about this new campaign, including the www.respect.gov.au website.

In particular, we are concerned about the omission of adequate, current and accessible information and resources for women and girls with disability. It is now well established and

recognised internationally and domestically that women and girls with disability are *"far more likely to experience violence and abuse than women and girls without disability, and they are less likely to report this abuse for both personal and systemic reasons"*.¹

After briefly reviewing the campaign materials and the www.respect.gov.au website, we would like to provide the following preliminary feedback that we believe must be considered in meeting the access requirements and inclusion of all women and girls with disability.

Our preliminary observations and concerns include, but are not limited to:

1. The language used across the website is inaccessible and includes terms that are now considered ableist and dismissive of disabled people's experiences. For example:
 - **"A blind eye can lead to a black one"**. We have considered how this messaging would come across to a vision impaired audience. It appears to imply that if someone has a vision impairment, they could expect a "black eye". This use of language is ableist and may come across as offensive to blind, and/or vision impaired people. It is also not in Plain English and uses a metaphor, which would likely be confusing to anyone with a cognitive or intellectual disability.
2. None of the information on the website is provided in Plain English and there are no Easy English and/or Easy Read translations or resources of the information on any of the pages.
3. With regard to the recently announced campaign, there are many references to "unmuting", and many symbols to "unmute". As a concept for people who access Zoom calls regularly, and who have a better understanding of technology, this may make sense. However, for many women and girls with disability this concept is unclear and may lead to this cohort clicking on a button (to unmute) that does not work. The sentiment could also be considered extremely insensitive towards individuals who are actually "mute" or who have other communication or speech impairments; and could also be interpreted as a form of victim-blaming towards women and girls with disability who are unable to physically speak up against violent or abusive behaviour.
4. Within the website, there appears to be no consideration of or reference to, the need for disability specific services to support victim-survivors. The only reference to disability specific resources and support on the site can be found in the 'Support Service' section in the front page on a navigational tab. Once the user scrolls down, they come to the disability support section, where there is only *one* option, yet the support service link does not link to a valid site.
5. It is regrettable that the technology used on the website (and referred to) is not inclusive of disability accessibility needs. For example:
 - Although an 'Accessibility' page is provided, the language used in the accessibility section comes across as difficult to understand and resembles web-based coding language. The reference to Internet browsers appears outdated and refers to web-browsers that are not

¹ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, [Accessibility and Inclusion Strategy](#), page 5.

common in Australia. For example, Opera software is a Norwegian software company that provides hotel management software. We had assumed Opera had assistive technology features for our audience but unfortunately it seems completely unrelated in both an Australian and assistive technology context. There are also links to browsers that we now know are not generally used in 2021 and are irrelevant and outdated.

- Features to enhance *accessibility* of the website are difficult to find and are currently located at the bottom on the website. For example:
- It appears as though many of the information pages on the website *may* have a screen reader option that can be accessed; however, it remains unclear as to whether users who are blind and/or vision impaired have been engaged by DSS in user-testing of the site. Screen reading functionality is only *one* element of accessibility, and it is internationally recognised that websites must be not only 'functional' but 'useable' by people with all types of disability and impairments. It must also be recognised that women and girls with disability, have varied and multiple access needs and this should always be accommodated to the *highest* accessibility level.
- The speaker on the screen reader function is a male voice, which may be extremely triggering for women who are experiencing violence perpetrated by a male. While we understand the 'voice' is likely standardised or computer generated, the ability to have a female voice should be mandatory on a website about violence against women and girls.
- There is no increase /decrease of text button visible on the Home Page.
- There is no contrast tool visible on Home Page.
- There are references to the 1800RESPECT service, however the reference does not display the full telephone number, nor does it explain what the service is or what support it can provide. The only call option on the home page is 000.

WWDA is providing this preliminary feedback to you, as Minister for Families and Social Services, as we believe that initiatives to address all forms of violence against women are vital, and there is a critical need to improve our collective responses to women and girls who remain marginalised from important initiatives such as the national 'Stop it at the Start' campaign.

As you may know, WWDA has extensive experience in co-designing digital platforms, including websites, that meet the accessibility requirements of all users. WWDA has co-ordinated and implemented a number of large projects in co-design with our members, including projects that resulted in the development of the Our Site website (<https://oursite.wwda.org.au>), launched by the Minister for Women Marise Payne in March 2020, and the Sunny App (<https://www.1800respect.org.au/sunny>), launched by the Hon Sarah Henderson and the Hon Michelle Landry in 2019. WWDA has also worked extensively with Medibank Health Solutions for more than a decade to completely redesign and rebuild the 1800RESPECT website and the service triaging model, in order to ensure full accessibility and inclusivity of women and girls with disability.

WWDA always works in a spirit of mutual respect and trust. Our organisation is widely respected for our collaboration with Australian government Departments and agencies to advance the rights

and potential of all people with disability. We would be extremely happy to work collaboratively with the Department of Social Services to ensure the national *'Stop it at the Start'* campaign, is developed to maximise accessibility and inclusivity for all users.

As you are aware, WWDA is a small organisation, yet is highly productive, and represents excellent value for money. We are very eager and committed to work with the Australian Government on initiatives (such as the national *'Stop it at the Start'* campaign) but would need resourcing to do so.

We look forward to your response at your earliest convenience, and we would be very happy to discuss these issues further with you directly, and/or your delegate.

We appreciate the opportunity to provide this letter to you.

With kind regards,

A handwritten signature in black ink, appearing to be 'CF', followed by a long horizontal line that ends in a small vertical tick.

Carolyn Frohmader
Executive Director

Finalist, 100 Women of Influence Awards 2015
Australian Human Rights Award (Individual) 2013
State Finalist Australian of the Year 2010
Inductee, Tasmanian Women's Honour Roll 2009
Australian Capital Territory Woman of the Year Award 2001

cc. Senator the Hon Marise Payne, Minister for Women