



## Blindness. Low Vision. Opportunity.

# Vision Australia Submission in Response to Draft Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017

Submitted to Transport for NSW

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## Introduction

Vision Australia is pleased to make comment on the public consultation draft of the NSW Government's Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 (which we will refer to henceforth as the Draft Regulations). We hope that our comments will lead to needed improvements in the Regulations and to a greater and timely focus on addressing the needs of people who are blind or have low vision. We also appreciated the opportunity to meet with the Point to Point Transport policy team and to raise some of our concerns directly with them.

## Lack of Access to Consultation Documents

At the outset, we need to emphasise our extreme disappointment and frustration that the two public consultation documents, the Draft Regulations, and the Regulatory Impact Statement, were not accessible to our staff who are blind or have low vision (and to anyone else who is blind or has low vision). The PDF files that were available on the Point to Point Transport website had not been produced to comply with the Web Content Accessibility Guidelines 2.0, which is the international best practice standard for the accessibility of websites and PDF documents. These guidelines are widely known and have formed the basis of government policies around website and document accessibility in Australia for over 10 years.

When we became aware that the consultation documents were not accessible we contacted the number listed on the invitation to participate in the consultation (1300 767 923). We made several phone calls and exchanged numerous emails in an attempt to obtain accessible versions of the two consultation documents. In all cases we found that staff were uninformed, unhelpful, and unwilling to assist us. It required a phone call to the Minister's office before action was taken to make the documents accessible. We are aware that some other organisations in the blindness and low vision sector were unable to obtain the documents in an accessible format that they required.

With all the knowledge, guidelines, policies, strategies, inclusion plans, and so on, that have been developed to promote the interests and address the needs of people with disabilities, we find the comprehensive failure of Transport For NSW to make its public consultation documents accessible at the outset to be breathtakingly inexcusable. We hope that lessons have now been learnt, and that future public consultations organised by Transport For NSW will demonstrate a greater commitment to universal inclusion.

## Recommendations

**Recommendation:** That the Regulations must include enforceable provisions that require point to point transport Providers to meet the accessibility needs of people who are blind or have low vision.

**Recommendation:** That the Regulations must include a requirement for all websites and applications used by point to point transport providers to comply with the Web Content Accessibility Guidelines 2.0. Additionally, the Regulations must require that

all information be provided in formats that are accessible to people who are blind or have low vision.

**Recommendation:** That the Regulations must include a requirement that the information displayed by fare calculation devices is accessible to people who are blind or have low vision.

**Recommendation:** That the Regulations must require the driver of a point to point transport vehicle to activate the speech output of their GPS system if requested to do so by a passenger who is blind or has low vision.

**Recommendation:** That the Regulations must require that all point to point transport operators ensure that booking systems and apps are accessible for people who are blind or have low vision.

**Recommendation:** That the Regulations must include provisions that allow drivers of point to point transport vehicles to stop and leave their vehicle in order to assist passengers who are blind or have low vision reach their destination.

**Recommendation:** That the Regulations must include provisions that allow drivers of point to point transport vehicles to move from their vehicle in order to assist passengers who are blind or have low vision to reach their destination, within the Sydney Airport Precinct and at other airports.

**Recommendation:** That S77(2)(e) of the Regulations be clarified to prevent the possibility of misinterpretation, so that the rights of Seeing Eye Dog users are protected.

## Vision Australia's Previous Submissions

Vision Australia has made a submission to every inquiry pertaining to the taxi industry in NSW over the past 13 years. For the most part, the issues and concerns we raise in the following paragraphs have been raised in every one of those submissions. For the most part, nothing has been done by industry or government to address them. As a result, people who are blind or have low vision do not have the same level of amenity, dignity and convenience when using taxi services as the rest of the community. As technology has developed, the degree of inaccessibility has increased.

In September 2015 Vision Australia made a comprehensive submission to the NSW Point to Point Taskforce as part of its review of point to point transport services. In that submission we reiterated many of the concerns we had previously raised, as well as introducing issues that are of particular relevance in the current, diversified, point to point transport environment.

The development of new Regulations for point to point transport presents an important, unprecedented, opportunity to address many of the inequities and barriers that exist for people who are blind or have low vision when they use such transport.

The Draft Regulations that form the basis of the present consultation have not grasped this opportunity. If the Regulations are adopted in their current form, we expect that people who are blind or have low vision will have less choice than the rest of the community, and face additional barriers to those they already encounter when using point to point transport services.

## **General Comments on Deregulation**

Vision Australia supports the overall intention of the NSW Government to provide greater choice in the point to point transport sector, including by the reduction of entry barriers and the removal of superfluous or anachronistic regulation. However, our support is conditional on the implementation of mechanisms to ensure that people who are blind or have low vision are not disadvantaged thereby.

An argument generally used to support deregulation is that it will increase competition, and increased competition will lead to greater choice for consumers. The market, it is claimed, will step in to fill gaps in products or services, and governments do not need to intervene. In the case of people who are blind or have low vision, this argument is completely without historical support. We cannot locate a single example where deregulation and reliance on the market have, in the absence of a specific mechanism such as government intervention or other regulations, removed barriers or led to the creation of products and services that are accessible to people who are blind or have low vision. Indeed, the history of disability is replete with examples where the opposite has resulted. Developments in mobile phones and touchscreen technology are two that we will discuss.

Mobile phones started to become popular consumer products in the mid-1990s. Early mobiles incorporated basic functions related to making phone calls and, later, sending text messages. None of these early mobile phones that were commercially available to consumers incorporated design features that made them accessible to people who were blind or had low vision. It was often possible to use the phones, but it required remembering sequences of button presses and hoping that unexpected messages did not display on the screen to disrupt the sequences.

Mobile phone technology and functionality continued to develop, but no accessibility features were introduced by any manufacturers of mobile phones. Eventually, two or three third-party software packages were developed that provided synthetic speech and braille access to a limited number of (mainly Nokia) mobile phones. The manufacturers themselves ignored the needs of people who were blind or had low vision, and did nothing to make their products accessible. In other words, the market did not step in to fill the accessibility gap, and it was only thanks to two small software companies that any mobile phones were accessible at all.

In 2007 Apple introduced the iPhone. Like other mobile phones that were available at the time, it did not include any accessibility features. Because it incorporated a touchscreen rather than a button interface, it was impossible for people who were blind or had low vision to use. The first Android phones, released in September 2008, were similarly inaccessible.

In 2009 Apple released the iPhone 3GS, which included the Voiceover screen-reader that the company had previously developed for its Macintosh operating system. Voiceover provides synthetic speech and braille access to the iPhone, and now also provides access to other Apple devices such as the iPad and the Apple Watch.

Apple's decision to include Voiceover, and make its iPhone accessible to people who are blind or have low vision, was motivated to a significant extent by its wish to have an advantage in securing procurement contracts with US Government departments and agencies. Under Section 508 of the US Rehabilitation Act, Government departments and agencies are required, wherever possible, to purchase ICT products and services from companies that can demonstrate that their products and services are accessible to people with disabilities. Without this regulatory incentive it is doubtful that the iPhone would have been made accessible at the time.

The inclusion of Voiceover in the iPhone did not lead to a proliferation of other accessible smartphones. The Blackberry, for example, has never been made accessible to people who are blind or have low vision, and although accessibility of the Android operating system has improved in the last few years, commercial smartphones based on Android vary widely in the extent to which they allow customers to use these accessibility features.

The introduction of the iPhone marked the beginning of the age of touchscreen interfaces on consumer electronics products. Over the past 10 years touchscreens have become increasingly prevalent on domestic appliances such as coffee makers, dishwashers, microwave ovens, washing machines, refrigerators, air conditioning systems, light switches, electric treadmills, digital radios, stereo systems, digital pianos, and other appliances. There is not a single domestic touchscreen-based appliance on the Australian market whose touchscreen has been made accessible to people who are blind or have low vision. Apple demonstrated that it is both economical and technologically possible to make touchscreens accessible, yet no appliance manufacturer is doing it.

The market has not addressed the accessibility gap created by the proliferation of inaccessible touchscreens, because there are no regulatory requirements or incentives for it to do so. Individual manufacturers will not incorporate features that increase the cost of their products and thus reduce their competitive advantage, and there is currently nothing to suggest that this situation will change in the absence of strong government or industry leadership, and the development of regulatory mechanism mandating accessibility and inclusive design.

It is instructive to reflect on these examples in the context of the Draft regulations for point to point transport because they demonstrate that assumptions about the sufficiency of a competitive marketplace for addressing the needs of people who are blind or have low vision are simply and dangerously wrong. In our view, it is irresponsible social policy to regulate an industry without including explicit mechanisms for addressing these needs. The Draft Regulations in their current form do not include such mechanisms. To that extent, we are compelled to categorically reject the Draft Regulations, and we strongly assert that if they are adopted in their current form they will not only perpetuate, but actively promote, discriminatory

barriers to the use of point to point transport by people who are blind or have low vision.

**Recommendation:** That the Regulations must include enforceable provisions that require point to point transport providers to meet the accessibility needs of people who are blind or have low vision.

## **Disability Standards for Accessible Public Transport**

Before commenting on specific aspects of the Draft Regulations it will be useful to discuss the relevance of the Disability Standards for Accessible Public Transport (the Transport Standards). These Standards have been developed under Section 31 of the Disability Discrimination Act 1992 (Cwth), which allows standards to be developed in a number of specific areas that are covered by the Act itself. If an individual or organisation complies with a Standard thus developed, they are considered to be complying with the requirements of the Act, and to that extent (but only to that extent) are immune to a complaint of disability discrimination.

The Transport Standards specifically define taxis as a "conveyance" covered by the Standards (S12(f)), but they do not specifically include hire cars or services such as those provided by Uber. For these conveyances to be included, they must be defined as a form of public transport by a relevant jurisdiction. Requirements of the Transport Standards that apply to taxis (such as the requirement for tactile registration numbers to be placed on the exterior of passenger doors) will not apply to other forms of point to point transport unless they are specifically classified as a form of public transport. If passenger vehicles such as hire cars and UberX are not classified as public transport, then our understanding is that the Regulations cannot rely on the Transport Standards to apply to them, and will therefore need to specify any and all matters that apply to taxis by virtue of their inclusion in the Transport Standards.

The Transport Standards, like the Disability Discrimination Act itself, rely on a complaints-based mechanism for enforcement. Complaints must be initially lodged with the Australian Human Rights Commission, who will attempt to resolve the complaint through informal, voluntary conciliation between the parties. If the complaint cannot be resolved in this way, the Commission will terminate it and the complainant may then proceed to lodge the complaint in the Federal Court, which has the power to make a finding of unlawful discrimination and to make legally binding orders.

While many complaints of disability discrimination are resolved through voluntary conciliation, many (and, from our experience, a growing number) are not. Because the Federal Court is a costs jurisdiction, it is quite rare for a person with a disability to pursue a complaint beyond the Commission's conciliation stage. What this means in practice is that many breaches of the Act and the various Standards remain unreported and unaddressed.

For example, S27.4 of the Transport Standards requires that "All passengers must be given the same level of access to information on their whereabouts during a public transport journey." The Transport Standards were introduced in 2002, yet it is

still the case that buses in NSW rarely provide audio announcements about upcoming stops to assist people who are blind or have low vision. A Disability Discrimination complaint was lodged against Railcorp because of the pervasive lack of audio announcements on NSW trains. Despite the Federal Court's finding of unlawful discrimination by Railcorp, many of our clients tell us that they are still often unsure of their whereabouts when travelling by train owing to the spasmodic, inconsistent and/or poor quality of audio announcements.

Every review of the Transport Standards has attracted submissions that have highlighted the lack of an appropriate enforcement mechanism as a major limitation of their effectiveness, yet nothing has so far been done to rectify this. The end result is that little positive change has occurred for people who are blind or have low vision in the area of public transport in the 15 years since the Transport Standards were introduced. This includes taxis.

We therefore do not believe that it is reasonable or sufficient for the Regulations to rely on the Transport Standards, or to assume that any breaches of the Standards will be pursued and addressed through the current complaints-based mechanism. In any case, there are numerous instances where the Transport Standards lack specificity or where technology not envisaged by the Standards has been developed. For example, the accessibility of transport apps and websites is not specifically covered by the Transport Standards.

## **Access to Information**

S54 of the Draft Regulations requires that taxi companies publish on their websites information about the fares payable by passengers. The Regulations will establish a more deregulated fares environment for taxis, and it is clearly important that information about fares be available to passengers so that they can make informed choices about the services they use. Unfortunately the Draft Regulations do not require, or even encourage, taxi providers to publish such information in formats that are accessible to people who are blind or have low vision.

S27.1 of the Transport Standards requires that "General information about transport services must be accessible to all Passengers." The Transport Standards do not define what "general information" actually is, and it is not clear, for example, whether information about fares would be considered "general information" either by the developers of the Standards or transport providers such as taxi companies who must implement them.

We recently checked the websites of five leading taxi companies in Sydney. One of those websites is completely inaccessible to people who are blind or have low vision, and using standard screen-reading software we were not even able to find the telephone number to use for making a booking or contacting the company to make them aware that their website is not accessible. The other websites vary in their level of access, but none of them includes any reference to compliance with the Web Content Accessibility Guidelines 2.0, which is the national and international best practice standard for web accessibility. Moreover, the Transport Standards do not restrict the availability of "general information" to that published on websites, but to

the best of our knowledge no taxi or other point to point transport company provides information in accessible formats to people who are blind or have low vision.

The point we wish to emphasise unequivocally is that the Transport Standards are not being followed now in the area of information provision, and it would be extremely perverse and unfair to omit requirements from the Regulations and expect people who are blind or have low vision to pursue complaints just so that they can gain access to basic information that is required to be available to the rest of the community. It would not be difficult to add a note to the Regulations to the effect that fares-related information must be published on websites in a manner that complies with the Web Content Accessibility Guidelines 2.0.

A similar comment applies to S52 of the Draft Regulations, which deals with fare estimates. Again, there is no requirement that such estimates be provided in an accessible format if a passenger is blind or has low vision, and we can readily envisage situations in which such estimates could be inaccessible. For example, a company might implement an automated system that sends a fare estimate via email in an inaccessible, image-only PDF file, and once the system is implemented it will be much harder to have it retro-engineered to make its output accessible. Accessibility of information is best achieved when it is incorporated into the design from the beginning. The Regulations provide an opportunity to ensure that this is done.

**Recommendation:** That the Regulations must include a requirement for all websites and applications used by point to point transport providers to comply with the Web Content Accessibility Guidelines 2.0. Additionally, the Regulations must require that all information be provided in formats that are accessible to people who are blind or have low vision.

## Access to Fare Calculation Devices

The Regulations will extend the concept of the traditional taxi meter to a more generic fare calculation device, reflecting the more flexible fare structures that will be allowed. However, neither the Draft Regulations nor the Transport Standards include any requirement that people who are blind or have low vision must be able to access the information displayed on these devices. Since the initial release of the Transport Standards in 2002, talking taxi meters have been developed, and trialled in some Australian states. They have not been trialled in NSW, and no taxi company has expressed any interest to us in trialling or developing this technology. While it is inevitable that there will be technological developments in fare calculation devices generally, we have no confidence that the market will extend these developments to include audio and other ways of making the displayed information accessible to people who are blind or have low vision. Once again, we are strongly of the view that the Regulations must provide guidance to taxi companies about what is expected of them in terms of making their fare calculation devices accessible.

**Recommendation:** That the Regulations must include a requirement that the information displayed by fare calculation devices is accessible to people who are blind or have low vision.



## Access to Location Information

As mentioned previously, the Transport Standards require that all passengers be given the same level of access to information about their whereabouts during a journey (S27.4). In the past it has not been possible to meet this requirement in taxis. However, almost all taxis and other vehicles used for point to point transport now have GPS systems installed that have an option for speech output. Enabling this feature can provide a passenger who is blind or has low vision with information about the route being followed, which helps them determine their whereabouts. This locational information is also useful in assessing whether the fare is reasonable.

In order to ensure greater compliance with S27.4 of the Transport Standards, the Regulations should include a requirement that a driver must activate the speech output of their GPS system if requested to do so by a passenger who is blind or has low vision.

**Recommendation:** That the Regulations must require the driver of a point to point transport vehicle to activate the speech output of their GPS system if requested to do so by a passenger who is blind or has low vision.

## Accessibility of Taxi and Booking Apps

The Draft Regulations make no mention of the need for applications developed by point to point transport providers for use in booking, monitoring and paying for journeys to comply with accessibility guidelines so that they are usable by people who are blind or have low vision. During the preparation of this submission we surveyed a number of apps currently available through the Apple App Store, and found that none of them comply with Apple's accessibility guidelines. It took us almost an hour to make a booking using Voiceover with one app, and we were not able to make a booking at all with others.

When Vision Australia made our submission to the point to point Transport Taskforce in September 2015, our clients reported that the Uber app was relatively accessible and easy to use. However, a number of our clients have told us since then that they can no longer use the Uber app because of accessibility barriers that were introduced in upgrades last year. This highlights the capricious nature of using apps to book services in the absence of regulatory mechanisms for mandating accessibility standards.

Although the accessibility of transport apps is not specifically addressed in the Transport Standards, it is likely that such apps fall within the scope of S24 of the Disability Discrimination Act, which makes it unlawful to discriminate against people with a disability in the provision of goods, services and facilities. The fact that many point to point transport apps are not currently accessible demonstrates that the Act is not proving to be effective in ensuring that people who are blind or have low vision have their needs met in this area. Moreover, we are aware of one complaint that has been made under the Act about a specific app. We understand that the provider

engaged constructively with the conciliation process, but their app still does not meet accessibility guidelines.

Again, we emphasise that without regulatory requirements or incentives, the market will simply not address the needs of people who are blind or have low vision. Given the increasing reliance on apps in the point to point transport sector, it is delinquent for government to assume that, somehow, these will be accessible; there must be requirements for developers and providers to make them accessible. People who are blind or have low vision will face insurmountable accessibility barriers, and consequently restricted choices, if the current accessibility vacuum is allowed to continue.

**Recommendation:** That the Regulations must require that all point to point transport operators ensure that booking systems and apps are accessible for people who are blind or have low vision.

## Taxi Zones and Drop-Off Points

We are deeply concerned that the Draft Regulations do not address situations where people who are blind or have low vision require assistance to get from the taxi or other point to point transport to their destination. For our clients, there are significant safety implications if a driver is not able to assist them from the vehicle to their destination, particularly in busy, high-traffic areas such as airports and city centres. Current zoning regulations are seriously disadvantaging our clients, especially in the Sydney CBD where there is a proliferation of “no stopping” zones that can make it impossible for a driver to assist a person who is blind or has low vision.

The Draft Regulations impose a penalty for a taxi driver to stop in a taxi zone if their taxi has been hired. This may mean that a taxi driver cannot leave the vehicle to assist a passenger who is blind or has low vision. In any case, the Draft Regulations make no provision for other point to point transport providers, such as hire cars and ride-sharing services, to drop off and assist passengers who may require it.

Given that we raised this issue in our 2015 submission to the point to Point Transport Taskforce, we are disappointed that it has not been addressed in the Draft Regulations. As with other issues we raised in that submission and in the present one, continued disregard of the needs of people who are blind or have low vision will only create further danger, disadvantage, discrimination, inequity and stress, at a time when the rest of the community is being given greater choice and safety assurances in their use of point to point transport.

**Recommendation:** That the Regulations must include provisions that allow drivers of point to point transport vehicles to stop and leave their vehicle in order to assist passengers who are blind or have low vision to reach their destination.

## Assistance at Airports

Many of our clients report that they are finding it increasingly difficult to use airports when they are travelling. One significant reason for this is that taxi and other point to point transport drivers are unwilling or unable to provide the assistance they need in getting from the vehicle to the check-in counter.

We are, of course, aware of the security issues that airport authorities must address, but security need not, and should not, come at the expense of creating unsafe and highly stressful situations for people who are blind or have low vision.

The Draft Regulations (S68) require that a driver of a passenger vehicle must not, "without reasonable excuse", move more than 3 metres from their vehicle while in the Sydney airport Precinct or other airports. An exception to this requirement (S68(2)(a)) is if the purpose of such movement is to load luggage or goods from the vehicle.

It seems, therefore, that loading luggage warrants its own exception, but providing assistance to people who are blind or have low vision does not. Obviously, this is not a policy that we find acceptable, and we hope that this inequity will be addressed before the Regulations are finalised.

**Recommendation:** That the Regulations must include provisions that allow drivers of point to point transport vehicles to move from their vehicle in order to assist passengers who are blind or have low vision to reach their destination, within the Sydney Airport Precinct and at other airports.

## Assistance Animals

It is most pleasing to note that the Draft Regulations impose a penalty for a driver who refuses to carry an assistance animal such as a Seeing Eye Dog (S64). We hope that this section will be enforced robustly, because many of our clients who use Seeing Eye Dogs continue to face discriminatory and stressful treatment by some drivers.

We note, however, that S77(2)(e) states that a driver may refuse to carry a passenger "(e) if the intending passenger is a person who is, or who is carrying a thing that is, likely to soil or damage the taxi or the clothing or luggage of other passengers, ...". We are sure that this subsection is not intended to provide an excuse for a driver to refuse to carry a Seeing Eye Dog, but our experience over many years suggests that loopholes will be exploited by those drivers who wish to do so. We therefore recommend that the scope and intent of this subsection be further clarified.

**Recommendation:** That S77(2)(e) of the Regulations be clarified to prevent the possibility of misinterpretation, so that the rights of Seeing Eye Dog users are protected.

## Conclusion

Vision Australia estimates that there are approximately 118,000 people in NSW who are blind or have low vision, relying on data provided by the Australian Bureau of Statistics. Because vision loss is primarily age-related and because the Australian population is ageing and living longer, we estimate that this number will exceed 176,000 by 2030. There is already a high level of taxi usage by people who are blind or have low vision, and we expect that this will only increase over time. The rest of the community is being given greater flexibility and choice as the point to point transport sector diversifies, new business models are introduced, and new technologies are deployed. Already there is a "transport gap" for people who are blind or have low vision, due to discriminatory barriers such as lack of accessible information, inaccessible booking and payment apps, inequities in the degree to which drivers are allowed to offer assistance, and zoning regulations that have been imposed with no regard for the needs of users. The Draft Regulations, in their current form, do little to address this gap, and quite a bit to widen it.

It is our impression that the Draft Regulations have been developed under the misapprehension that the needs of people who are blind or have low vision will either somehow magically take care of themselves, or that the market will act benevolently to address them. There is no evidence to support either of these notions and every reason to reject them.

In recent years the NSW Government has repeatedly signalled its wish to include people with disabilities in the general community. Policy-makers and regulators have a responsibility to ensure that this rhetoric is translated into practice, rather than remaining a mere abstract goal with little relevance to the lives of real people with a disability. The Regulations for point to Point Transport offer an important opportunity to remove existing barriers and prevent the creation of new ones. We hope that the final form of the Regulations will address the issues we have identified in this submission so that this opportunity is not squandered.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150<sup>th</sup> year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

- Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
- Aids and Equipment, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs
- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Employment services, including national Disability Employment Services provider
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government
- Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia (BCA), to strengthen the voice of the blind community. We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.