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Attention: Jodi Cassar

Please accept this letter as Children and Young People Australia (CYDA)'s submission to the Department of Social Services (DSS) Discussion Paper, Evaluating the Use of Visual Descriptions at DSS Events.

Thank you for the opportunity to provide written feedback on the discussion paper regarding Visual Descriptions.

Children and Young People with Disability Australia (CYDA)

Children and Young People with Disability Australia (CYDA) is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has extensive national networks of young people with disability, their families and caregivers, and advocacy and community organisations.

Our vision is that children and young people with disability in Australia will fully exercise their rights, realise their aspirations and thrive in all communities.

CYDA's Recommendations and Response to the discussion paper

In preparing our response we consulted with CYDA staff who have lived experience of disability and CYDA's Inclusion and Support Co-ordinator who works closely with young people with disability from the CYDA community, including people who are blind or low vision. We also provide feedback from participants from consultations held by CYDA, where Visual Descriptions are provided.

Below we respond to the first three questions as they relate specifically to the topic of Visual Descriptions, which is the focus of our response.

1. Do visual descriptions meaningfully enhance a sense of inclusion why / why not?

CYDA's Recommendation: DSS should retain the use of Visual Descriptions, provided effective guidelines and safeguards are implemented.

CYDA acknowledges that opinions differ on the value of Visual Descriptions. While we do not propose a one-size-fits-all approach, we recommend that DSS retain this practice as

part of a broader commitment to inclusion and accessibility, aligned with the rights-based principles underpinning Australia's Disability Strategy 2021–2031.

Visual Descriptions directly support **Recommendation 6.1 of the Disability Royal Commission**, which calls for a national plan to improve inclusive and accessible communication. This recommendation emphasises the importance of communication that is **accessible**, **reliable and responsive** to the needs of people with disability.

Visual Descriptions contribute to these objectives by:

• Enhancing Access to Information: For people who are blind or have low vision, Visual Descriptions provide essential access to visual elements, such as presentation slides, physical gestures or multimedia content that might otherwise be excluded. In CYDA's experience the practice of Visual Descriptions aid inclusion. As Blind or low vision members of CYDA community who have participated in CYDA's Youth Council and varied consultations attest. The following quote from one consultation participant is indicative of participants' experience:

"Please keep up the Visual Descriptions they are unbelievably helpful and add a lot to the meetings for me" [CYDA Consultation participant, 2024]

- Improving Reliability in Communication: Consistent and well-delivered Visual Descriptions ensure that key visual information is conveyed inclusively, addressing gaps in accessibility during presentations or events.
- Fostering Responsiveness to Individual Needs: Pre-event consultations, such
 as checklists or accessibility preference forms/expressions of interest, enable
 organisers to tailor Visual Descriptions to the specific needs of participants. This
 approach mirrors existing inclusive approaches, such as providing interpreters for
 D/deaf individuals or Easy Read materials for people with intellectual disability.

Incorporating Visual Descriptions into DSS events also aligns with the principles of Australia's Disability Strategy and demonstrates a commitment to creating inclusive, equitable environments. Additionally, although not specifically mentioning Visual Descriptions, the Good Practice Guidelines for Engaging with People with Disability (p.28)¹, emphasise the importance of enabling participation of people who are blind/low vision without relying on visual materials, using verbal input or sensory engagement practices instead.

¹ https://www.disabilitygateway.gov.au/good-practice-guidelines

The visual description practice supports the goal of delivering communication that respects and responds to the diversity of all participants.

To maximise the impact of Visual Descriptions, DSS should implement clear guidelines, including standardised delivery methods, audience-specific adaptations and comprehensive training for presenters. These measures will ensure Visual Descriptions are delivered consistently, respectfully and in alignment with best practices for accessible communication.

We provide a guideline example in our response to Question 3 below.

2. Are there specific contexts where the practice of providing a visual description is more or less appropriate, and why?

The practice of providing Visual Descriptions should prioritise accessibility and be guided by the needs of the intended audience. While there is no one-size-fits-all approach, clear guidelines and examples can help ensure Visual Descriptions are used effectively and appropriately.

Contexts for Visual Descriptions

Visual Descriptions are particularly relevant in contexts where they enhance accessibility and understanding. For example:

In discussions or introductions: Providing a brief visual description at the start of a verbal introduction—whether in person or online—can help set the tone and support greater engagement for all participants.

In online settings: Descriptions of participants' appearances can help clarify who is speaking and reduce confusion.

In-person interactions: Descriptions of a room, layout, or physical environment can provide critical context for people who are blind or have low vision, enhancing their understanding of the setting helping them feel included and comfortable.

Best Practices for Visual Descriptions

Keep descriptions brief (ideally under 30 seconds), seamless, and sincere.

Tailor the description to the individual and the context to ensure relevance.

Include details such as hairstyle, hair colour, race/ethnicity, age or age range, gender, clothing, distinctive accessories (e.g., glasses, large jewellery), or mobility aids (e.g., guide dog, wheelchair, cane).

Guidelines to Avoid Misinterpretation

To ensure clarity and appropriateness:

Avoid jokes, comments on attractiveness, or subjective commentary on appearance. Focus descriptions on objective and factual details that are relevant to the context.

Provide facilitators with guidelines to include Visual Descriptions as part of access needs or reasonable adjustments when planning meetings or consultations.

Benefits of Visual Descriptions

Like Alt-text and image descriptions, verbal Visual Descriptions provide vital context, avoid unconscious bias, and help participants identify who is speaking during conversations. When used thoughtfully, they can enhance inclusion and accessibility across various settings.

3. If a person chose to provide a visual description, how can DSS ensure the description is delivered in a consistent and meaningful way?

Further to suggestions in CYDA's response to Question 2, guidelines on the use of Visual Descriptions can ensure that they are provided in a consistent and meaningful way.

Providing an example of a visual description as a model can help others to ensure that theirs are similar and appropriate.

Disability & Philanthropy Forum have an example of an appropriate self-introduction and visual description:

How to Make Accessible, Inclusive Self-Introductions - Disability & Philanthropy Forum

Thank you again for this opportunity to contribute to the discussion paper regarding Visual Descriptions.

If you have any questions about this letter or you would like to know more about CYDA's policy and research work please do not hesitate to contact Liz Hudson, Policy and Research Manager on 03 9417 1025 or lizhudson@cyda.org.au.

Kind regards,

Dr. Liz Hudson
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