



The Royal  
Society for  
the Blind

1 February 2012

Assistant Secretary  
Human Rights Policy Branch  
Attorney-General's Department  
Robert Garran Offices  
3-5 National Circuit  
BARTON ACT 2600

## **Re: The Consolidation of Commonwealth Anti Discrimination Law**

The Royal Society for the Blind of South Australia Inc (RSB), a quality endorsed organisation, is the primary provider of services to over 12,000 people who are blind or vision impaired in South Australia.

The RSB, firstly, congratulates the Government on embarking on a process to streamline and integrate the following discrimination Acts:

- Racial Discrimination Act 1975
- Sex Discrimination Act 1984
- Disability Discrimination Act 1992
- The Age Discrimination Act 2004
- The Australian Human Rights Commission Act 1986
- Provisions in the Fair Work Act 2009 that relate to discrimination

We welcomed Australia's signing of the United Nations Convention on the Rights of Persons with a Disability (UNCRPD) and believes that the Principals as stated in the UNCRPD should be mirrored in the new Act. This will ensure consistency and assist with education and awareness for Government and the Community enabling each to understand their responsibilities under International and Australian law.

## **Our Services**

Adaptive Technology  
Community Education  
Counselling  
Employment Services  
Guide Dog Service  
Industrial Services  
Library Services  
Low Vision Centre  
Mobility Services  
Outreach Services  
Peer Support  
Print Alternatives  
Recreation & Leisure  
Systemic Advocacy

## **Adelaide**

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**Office** 8232 4777  
**Donate** 1800 644 577  
**Email** mail@rsb.org.au

## **Corporate Office**

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Adelaide SA 5000  
8223 6222

## **Industrial & RSB Guide Dog Services**

11 Blacks Road  
Gilles Plains SA 5086  
8261 4121

## **Regional Offices**

Mount Gambier  
Noarlunga  
Port Augusta  
Smithfield  
Victor Harbor

[www.rsb.org.au](http://www.rsb.org.au)

The Royal Society for the  
Blind of SA Inc.

For many years the RSB has advocated that the Disability Discrimination Act (DDA) be amended to allow not only individuals to lodge a discrimination case but that organisations advocating on behalf of people with a disability and the Human Rights Commissioner be also empowered to instigate a complaint. The number of complaints lodged by people who are blind or vision impaired is not reflective of the amount of discrimination that actually occurs as many people choose not to endure the emotional or financial costs that is required to lodge and pursue a complaint.

The RSB therefore recommends that the new Act reduces the costs associated with a complaint and limits any court costs that may be awarded if the discrimination is unfounded and allows organisations and the Human Rights Commissioner to lodge a complaint.

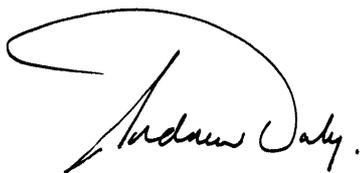
Whilst it is important that the legislation is simple, easy to understand and use, it is important that it is supported by a well structured Education and Awareness campaign to ensure that the whole community understands their obligations and rights under this legislation.

The RSB currently provides advice and consults with a wide range of stakeholders to reduce the barriers to people who are blind or vision impaired. To achieve this we promote the Principals of Universal Design particularly at concept and design stage. It is more likely that by following these principals, irrespective of whether it is a building, product, urban street layout or a service, the current barriers to access will not occur. Further, good design is “good design” for all, for instance clear and legible signage assists all members of the community, not just people who are vision impaired.

To provide a catalyst for such change we also recommend the Federal Government adopt a mandatory policy on accessible procurement for all its facilities and equipment to ensure it is accessible to the whole community. This in turn, as a result of volume becomes the “norm” rather than exception. Given the Federal Government is probably the largest purchaser of goods and services in Australia this will encourage providers to ensure products are compliant at the design phase.

I trust that these comments assist in the review process, if you require any further information please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Daly', with a large, sweeping flourish above the name.

**ANDREW DALY**  
**Executive Director**