

14/10/2024

Digital.Govt.NZ  
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Department of Internal Affairs  
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## **Submission on Proposed Changes to Web Standards – Review 2024**

Tēnā koutou katoa

Age Concern New Zealand (ACNZ) welcomes the opportunity to submit comments on proposed changes to Web Standards. Our organisation is a member of several advisory groups focused on organisations and services hearing the voices of older people and people with disabilities. One example is the New Zealand Banking Association Older and Disabled People's Focus Group. We provide input to elevate the lived experiences of older and disabled people negotiating everyday life.

We are encouraged by the commitment to accessibility for all publicly funded New Zealand government digital content and services so that they are usable by people with disabilities.

We further support the interim updates being proposed to keep the Web Standards up-to-date and fit for purpose.

### **About Age Concern New Zealand**

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Age Concern New Zealand is a trusted charity working in local communities throughout Aotearoa New Zealand to support older people, their friends and whānau. We have 29 local Age Concerns operating in 40 locations throughout the country and a national office based in Wellington.

Our strategic goal is:

*Every older person feels connected, has positive choices and can age well.*

Our values of Dignity. Wellbeing. Equity and Respect for older people are our guiding lights and underpin everything we do.

Our core services include advocacy and public awareness, health promotion, social connection, elder abuse and neglect prevention, and providing support through expert information, advice and referrals.

Our organisation is also working on how to make our website and digital information increasingly accessible. This is a challenge for any service but is clearly the right thing to do.

## Introduction

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The one in four New Zealanders who have a physical, sensory, learning, mental health or other disability have the right to easily access government information in multiple formats.

People with disabilities are often expected to just make the best of it, but they are entitled to the same access to information and freedom of choice that people without a disability enjoy.

Age Concern New Zealand has a particular focus on people aged 65 and over who have a disability. Some may have had a disability throughout their lives, others may have a disability as part of age related changes.

We are looking forward to the results of the Disability Survey 2023 which will give valuable insights and data. The 2013 survey indicated that 1.1 million or 24% of New Zealanders identified as disabled, with 53% of disabled people having multiple impairments.<sup>1</sup> This increased to 63% of disabled people aged over 65 having multiple impairments.

There are a growing number of people aged 65 years and older in Aotearoa New Zealand. Within ten years the over 65 population is expected to reach 1.2 million, with the over 85 age group being the fastest growing.<sup>2</sup> Over 65s are also increasingly diverse with Māori, Pasifika and Asian older populations growing at a faster rate than European/Pakeha seniors.

The growth in our older population will create even greater demand for website content in accessible formats.

## Our primary recommendations for your consideration are:

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1. Overall, Age Concern New Zealand **supports** the proposed changes to Web Standards.
2. **We agree that the definitions of ‘responsible for’ and ‘contributes to’ are clear** and will assist with the identification of the websites an organisation is responsible for as opposed to websites those organisations simply contribute to.
3. **We consider the definitions of ‘publicly facing’ and ‘internally facing’ are clear.** and will help distinguish between these two types of websites.

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<sup>1</sup> <https://www.stats.govt.nz/assets/Uploads/Disability-survey/Disability-survey-2013/Disability-survey-2013-additional-documents/Disability-Survey-2013.pdf>

<sup>2</sup> <https://officeforseniors.govt.nz/better-later-life-strategy/>

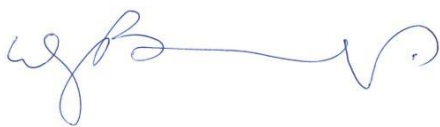
4. **We recommend that all live videos have captions.** Without captions people with hearing disabilities will be excluded and unable to directly access information they may need. People with disabilities should not have to rely on someone else to relay information to them, they are entitled to have direct access.
5. **We recommend that all videos should have audio description if the videos are on websites accessed by the public.** We are aware there are cost implications, however, it is problematic determining who gets to decide what qualifies as high stakes information or services. Adopting captions and audio descriptions as standard practice for videos will help to ensure information is accessible to people with disabilities.
6. **We agree that websites are required to have an accessibility statement that:**
  - identifies how well the site conforms to WCAG
  - identifies and describes in plain language the non-compliant content on the site and its potential impact on users
  - provides a contact method for people to get in touch with the site owner about non-compliant content and how to get accessible versions of that content
7. **We support each website providing access to an Organisation Privacy Statement and a Website Privacy Statement** as outlined in the consultation document.

### Closing comment

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Thank you again for the opportunity to provide our submission on the Proposed Changes to Web Standards – Review 2024.

Nāku noa, nā,



Karen Billings-Jensen  
Chief Executive  
Age Concern New Zealand