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Senate Finance and Public Administration Committees
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Submission to the Inquiry on Digital Delivery of Government Services

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistic backgrounds are given proper recognition in public policy.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind.

FECCA welcomes the invitation to make a submission on the Digital Delivery of Government Services.

Recommendations

FECCA recommends that the government, in their delivery of digital services:

1. Recognise the diversity of users and the ensuing gaps in capacity and access:
 - Utilise person-centric design and user experience considerations for those who do not speak English as their first language and/or have limited digital literacy or access.
 - Develop data-collection plans with consistent terminology, and clearly indicate the types of information that will be collected across government agencies.
2. Improve accessibility of online government service delivery:
 - Use simple and consistent icons across platforms.
 - Clearly identify online information in community languages by signalling the availability of translated materials with a consistent symbol across all relevant government websites.
 - Enable interactive technologies that make information and services available to people who have low written proficiency in both English and their preferred

- language, for example, the ability to hover over text and access an audio translation.
- Clearly circulate information about complaints and feedback mechanisms so that users can proactively respond when digital service delivery is unsatisfactory.
3. Provide multiple pathways for members of the CALD community to interact with government service delivery:
 - Integrate digital platform-based services with existing shopfronts so that consumers have a face-to-face interaction option.
 - Employ pop-up information and assistance shops in places such as shopping centres, community centres and libraries, particularly in rural and regional areas.
 4. Communicate with ethnic communities in order to improve awareness of online services, and reduce concerns about privacy and security:
 - Communicate messages about privacy and security of government digital service delivery to users in plain English and community languages.
 - Implement a comprehensive strategy to introduce digital platforms to new users, including new migrants and young people.
 - Employ appropriate engagement strategies for shopfronts in CALD areas through the provision of interpreting services and bicultural/bilingual staff.
 5. Build community capacity and equitable participation in the use of digital services:
 - Fund assistance to multicultural, ethno-specific, and settlement service providers to deliver training to migrants and refugees.
 6. Coordinate and provide leadership:
 - Coordinate the development of digital platforms and the overarching policies that address cultural and linguistic diversity considerations.
 - DSS and DTO lead in facilitating the inter-agency cooperation regarding the Multicultural Access and Equity Policy, as it applies to meeting the Digital Service Standard. This includes collaborating with the community sector in the development of multicultural digital service design and delivery guidelines.

Key Message

The move towards digital delivery of government services is of interest and concern to FECCA because such changes will have an impact on how CALD communities engage with government departments and agencies. It is important that any reforms adequately consider, and tailor responses to, access and equity issues regarding online information provision and service delivery, with a view to overcoming barriers and achieving equitable outcomes. Multicultural access and equity embodies the notion that all Australians can access government programs and services, regardless of their cultural or linguistic background.

Overview

FECCA believes that the success of Australia's social cohesion partly depends upon the public's ability to engage with policy making and delivery processes. We recognise that the Australian government has been working to improve access and outcomes. However, FECCA emphasises that such efforts must be fully inclusive of all Australians, and accommodate those from CALD backgrounds who have varying levels of literacy (including digital literacy).

In 2016, FECCA published a report entitled '[Digital Access and Equity for Multicultural Communities](#)'. This discussed the Australian government's move towards digital service delivery and its impact on CALD communities. It found that some migrant cohorts struggled to access online services and processes because of limitations in the digital delivery of services. These were not fully inclusive of a range of digital literacies, different English language proficiencies, and the level of understanding of Australian democratic processes.

However, other migrant groups such as skilled migrants, young migrants, and those with good English language skills, were able to better adapt to digital service delivery. FECCA strongly encourages government departments and agencies to ensure that their digital service delivery options are accessible and equitable to all Australian residents.

FECCA recommends that the digital delivery of government services be co-designed with CALD communities. In addition, CALD specific material or processes should not merely be included later as an 'add-on'. Co-design enables a greater understanding of what is required by such communities and how the government can best meet their needs. Engaging migrant and refugee clients—particularly those who do not speak English as their first language and/or with limited digital literacy or access—during the concept stage of design, ensures that linguistic and cultural factors are considered, and solutions embedded within the structures and processes.

The digital literacy of migrants can vary greatly and may depend on factors such as experience or age. In addition, some refugees and older migrants who have not acquired technological skills over time may also have limited access to digital platforms. Some new arrivals need a lot of training and support before developing computer literacy or functional knowledge of government systems. However, other groups are very comfortable using computers, smart devices and the internet regularly. In light of this, the government should support settlement services to increase the digital literacy of migrants requiring further assistance. Developing digital literacy should be considered part of the settlement process.

Australian government digital service delivery must also meet the Digital Service Standard as developed by the Digital Transformation Agency. The standard includes criteria for understanding user needs, designing and building a user-centred process, and making the service accessible to all users regardless of their ability and environment. This is particularly significant for culturally and linguistically diverse users because their requirements need to be recognised and accommodated in all stages of design and delivery.

Where webpages are only available in English or are particularly text dense, Australians with low written English language proficiency can struggle to interact with them. FECCA recommends that websites utilise simple, clear, plain English instructions together with symbols or images that facilitate effective and swift communication. Translated webpages can be of use when they are easy to locate and the translation is accurate and culturally appropriate. However, some migrants may have low reading proficiency in their preferred language so it is important that links to alternative interpreter services are also provided.

The use of simple and consistent icons and layout across all government websites will enable easier navigation of different agencies' websites by users. For example, a prominently displayed symbol can signal the availability of translated materials or access to interpreters. In addition, interactive technologies such as hovering over translatable texts and access to audio translations can also be used to improve the user experience for non-English speakers. These measures would ensure that information and services are accessible to people with a range of literacies in English and in their preferred language.

To ensure that everyone in Australia's culturally and linguistically community has access to and equity in digitally delivered government services, special emphasis should be placed on complaints and feedback mechanisms that are easy to find and use. FECCA recommends that government departments and agencies:

- allow consumers to provide feedback and complaints via multiple *methods* such as voice, private actions and third party methods;
- ensure that their feedback and complaints mechanisms provide multiple *channels* including face-to-face, telephone and online;

- ensure that their feedback and complaints channels are consistent across government, and have been designed to meet the needs of CALD consumers;
- build trust with CALD communities so that individuals feel confident in providing feedback and making complaints;
- run a promotional campaign targeting CALD communities to highlight the right of redress;
- actively and regularly promote the available mechanisms to provide feedback and complaints in all interactions with consumers; and
- develop distribution materials for CALD communities and individuals on how to provide feedback and complaints.

FECCA emphasises that the recipient of a government service and the user of the digital delivery of the service are not necessarily the same person. Many individuals use digital services on behalf of others. In a major community consultation survey conducted by FECCA in 2016, about 50 per cent of respondents had used online government services on behalf of someone else. The most commonly identified reason for using online services in this manner was because the service recipient did not know how to utilise digital services. However, under certain circumstances the use of a nominee may breach an individual's privacy or represent a conflict of interest. When data concerning use of digital services is collected, it is important to distinguish who is accessing the service from who is information. FECCA encourages the government to take such situations into consideration when designing and delivering digital services.

FECCA understands that data collection regarding the utilisation of digital platforms to access services is important. However, the type of information that is collected, how it is stored and for how long, as well as how it will be used or shared, needs to be made very clear. The security of such sensitive information is an issue that concerns FECCA and we encourage data collectors to utilise secure storage methods. Transparency and accountability in this area will go some way to garner further trust between CALD communities and government departments and agencies.

Conclusion

FECCA recognises that there is an increasing need for government services to be delivered digitally. However, we recommend that the diversity of users be acknowledged, and possible gaps in literacy and access be managed carefully. Government departments and agencies must ensure that there are multiple ways for community members to interact with them. They can do this by coordinating the development of digital platforms, and the overarching policies addressing cultural and linguistic diversity considerations. FECCA encourages relevant stakeholders to build community capacity and ensure equitable participation in, and outcomes for, the use of digital services.

The development of digital platforms and the overarching policies that consider and respond to CALD communities should be implemented in a coordinated manner. DSS and the DTO are well positioned to support other agencies in meeting their obligations under the Multicultural Access and Equity Policy. Such support could be provided through, among other things, the development of relevant resources such as multicultural digital service design and delivery guidelines. Coordination will allow government agencies to share learnings and data in order to inform future processes.

FECCA would be glad to contribute in more detail on matters relating to culturally and linguistically diverse users of digital systems as we are interested in improving the experiences and outcomes for CALD community members. For further information please contact FECCA Director, Dr Emma Campbell, on