

Centre for Accessibility Australia

# CANCELLATIONS FOR ALL

**Final Report**  
**April 2024**

Addressing key accessibility issues faced by consumers when cancelling prepaid mobile services on telecommunications carrier applications and websites



## About Centre for Accessibility Australia

The Centre for Accessibility Australia (CFA Australia) is an award-winning disability-led not-for-profit organisation that works to promote digital access.

The digital world is an amazing resource that all of us increasingly rely on; however, the reality for people living with disability is that much of the internet remains inaccessible. CFA Australia coordinates a number of projects designed to reduce the accessibility gap and empower organisations to effectively implement accessibility.

1. We provide training for organisations and individuals looking to implement accessibility.
2. We provide website auditing services for organisations looking to access and improve their accessibility.
3. We develop free, highly accessible online resources for content creators and organisations to promote and respond to digital access.
4. We create free online resources for people with disabilities on how to use Assistive Technology. These resources will include how-to guides for Assistive Technologies (AT), product advice about AT, and a free helpdesk that provides information and assistance about AT for people with disabilities.
5. We advocate and promote the accessibility movement via our accessibility campaign. The purpose of the campaign is to empower and encourage digital content developers to implement accessibility when designing online resources.
6. We celebrate Accessibility success stories through the biannual Accessibility Awards.

## Acknowledgements

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# Executive Summary

The Cancellations for All project has been funded by ACCAN to explore the issues raised with CFA Australia by people with disability regarding the difficulty in cancelling mobile phone plans. To identify potential issues in cancelling plans provided by SIM providers, a comprehensive assessment was taken of 44 SIM providers in relation to user testing and conformance against the WCAG 2.2 standard.

The results of this project identified that there are currently no apps or websites that completely support people who are blind or have low vision, and a very low number of apps can completely support people that are deaf or hard of hearing in cancelling their plans. All apps or websites had some form of accessibility support for people that have a cognitive disability, but none of the apps were entirely accessible across the board. People who are blind or have low vision face an additional challenge in that there were accessibility issues with both using their preferred assistive technologies such as screen readers, and accessibility issues with the app or website itself not conforming to WCAG standards.

Although all providers had some accessibility issues, there were two standard SIM providers in Telstra and Catch Connect which had minimal issues for people who are blind or have low vision but provides an effective support for people with a hearing, mobility, or cognitive disability. Some areas where SIM providers were generally successful in providing accessible content included captions on videos, good use of language and onscreen keyboard accessibility.

Common accessibility issues across SIM providers include problems locating the cancellation option itself, a lack of multiple support options, lack of information in the FAQ, the required use of a phone call to cancel service, colour contrast issues, lack of screen reader capabilities, issues with universal accessible settings, inconsistent page layout and navigation, voice control capability issues and touch gestures.

While all SIM providers have room for improvement, it is encouraging that there are some leaders in this area and providers are encouraged to look at the accessibility and service offerings of companies that provide effective support in this space to provide broader improvements going forward. The data table for all 44 SIM providers in Appendix A is published on the CFA Australia website. Training support to SIM providers is included as part of this project to support the improvement and awareness of digital access processes.



# 1.0 Introduction

## 1.1 Project overview

The ‘Cancellations for All’ project was launched to support people with disability, their families, and carers over accessibility issues in the telecommunications sector regarding the cancellation of mobile services. CFA Australia applied for funding from ACCAN through their grants program. This allowed CFA Australia to facilitate research and analysis on which accessibility issues were prevalent when cancelling a prepaid mobile service, along with the associated support options that were available and how these issues could be addressed.

This project began in September 2023 with the report completed in April 2024, which is available as a free reference on the [CFA Australia website](#).

## 1.2 Why this project is important

In a previous ACCAN project titled ‘Telcos for All,’ CFA Australia worked directly with a number of Telecommunication companies to specifically address issues relating to plan, usage, and billing information. Interest in this previous project led to consumers informing us of difficulties in cancelling phone plans as well.

This ‘Cancellations for All’ project is important in order to find out why phone plans are difficult to cancel and provide practical guidance on what support is already available. Specifically, the project investigates how to improve the accessibility of mobile phone plan cancellations for the around [4.4 million people in Australia with some form of permanent disability](#) as reported by the Australian Institute of Health and Welfare (AIHW).

In relation to digital access, the Australian Bureau of Statistics (ABS) [confirmed in 2018 that 1.1 million people with disability \(28.5%\) did not use the internet](#), which is largely due to individuals running into accessibility barriers. This compares with 12% of the general public that do not participate online. As shown here, there is currently a notable digital divide facing people with disability due to accessibility issues, as a lack of accessible content can impact whether people with disability are able to make informed decisions online. In addition, [81% of the Australian population used a smartphone as of 2017, with the share estimated to reach around 87% by 2026](#). This is especially important to this project as any digital access issues are likely to have a large impact on people with disability in a world that’s increasingly reliant on the use of a mobile phone. As such, this report aims to better allow people with disability to make informed choices about their mobile phone plans, including answering questions such as “what is the best SIM provider that addresses my digital access needs?” and “how can I make an informed decision by comparing sim providers when purchasing and cancelling mobile plans.”

People with disability are willing to embrace the advantages independent access to online content provides if accessibility restrictions are removed, according to research on the disability gap conducted by [Hollier \(2006\)](#) and [Conway \(2014\)](#). [Sir Tim Berners-Lee](#), inventor of the World Wide Web, [described the importance of web accessibility](#), in these terms:

“The power of the Web is in its universality. Access by everyone regardless of disability is an essential aspect.” In essence, Disability + Technology = Independence.”



Digital platforms and communications are central to key tasks and functions in the way we conduct our lives. Our dependency on telecommunications providers connecting us effectively with our local community, our nation, and the world has arguably never been more important. This context highlights the strategic importance of addressing access issues identified by consumers with a disability to helpdesk and plan cancellation features provided by SIM mobile providers.

Accessibility is not just a question of inclusivity, it is also a legal requirement under Section 24 of the Disability Discrimination Act 1992, with guidance on web accessibility standards provided by the Australian Human Rights Commission (AHRC) in their World Wide Web Access: Disability Discrimination Act Advisory Notes ver. 4.1 (2014). It is critical that people with disability are able to exercise their right to cancel mobile plans, with these advisory notes aiding in the prevention of discrimination complaints under the Disability Discrimination Act. The 2014 notes also specifically reference the importance of the Web Content Accessibility Guidelines (WCAG) standard in assessing digital access requirements.

However, although legal compliance can be a motivator for making online services accessible, CFA Australia focuses more on advocating for the importance of digital access, and providing support and education to organisations so they can understand the benefits accessible content can provide. Simply put, providing a carrot instead of a stick.

Additional information on the ways in which people with disability engage with online content can be found at the resource [How People with Disabilities Use the Web](#) produced by the World Wide Web Consortium (W3C).

## 1.3 Aims and Objectives

The aim of this project has been to support the ever-growing telecommunications industry in making its online content more accessible. Importantly, focus has been given towards accessibility of the cancellation of a service and the support options provided.

Recent trends have seen many companies not previously associated with telecommunications start to offer SIM mobile plans. As such, due to the large amount of new SIM mobile plan providers, the project focused on undertaking sector-wide audit assessments based on key accessibility factors for four disability groups, these being people with a vision, cognitive, mobility, or hearing disability. This included the three major telecommunications providers of Telstra, Optus and Vodafone/TPG, alongside various smaller specialist providers whose networks are based upon either of these three major providers. CFA Australia was able to successfully test 44 SIM providers as noted in Appendix A. However, seven providers could not be tested due to only providing SIMs to customers of other services, communication challenges, or difficulties in providing ID requirements. The audits specifically focused on the ease of ability to find a cancellation option, along with the accessibility of service cancellation, as well as support options for people with disability and general app or website accessibility when logged into a user account.



The core objectives are as follows:

1. To ensure that consumers with a disability can review all companies offering SIM mobile plans in Australia and quickly determine which ones have accessible support and cancellation services.
2. To determine which accessible SIM provider has coverage in their area by identifying if the provider uses Telstra, Optus, or Vodafone/TPG networks.
3. Testing all 44 identified SIM mobile providers in Australia for their app accessibility.
4. Through the delivery of training, upskill the telecommunications industry on developing a range of accessible support and cancellation options, building on the established relationships in the previous 'Telcos for All' ACCAN project which addressed broader plan, usage, and billing accessibility issues.
5. Creation of video and social media processes to promote the resource and alert SIM mobile providers to the challenges consumers face.

## 1.4 Project deliverables

The deliverables of this project are as follows:

- Consumer Quick Reference Resource – This is a resource published on the CFA Australia website that will provide a quick reference for consumers with disability. The guide will contain: SIM provider and website, Carrier (Telstra, Optus, Vodafone/TPG), Support options (phone, AI text chat, human text chat, videos with captions, assistive technology support, e-mail, teletypewriter (TTY) Auslan video chat), and disability group support for but not exclusively to consumers that are blind or have low vision, are Deaf or hard of hearing, and have mobility or cognitive impairments.
- Full Report - This report provides a detailed analysis on each of the SIM providers, testing process and findings.
- Workshop - This workshop supports SIM mobile providers in addressing their accessibility issues. This includes highlighting the results and addressing app accessibility issues in accordance with the W3C WCAG 2.2 standard.
- Video and Social Media Campaign - This output highlights the project findings and helps SIM mobile providers to address key accessibility issues.

The deliverables are focused on ensuring that telecommunications providers have an understanding as to the existing accessibility issues through the brief audits detailed within the full report, then address the issues for consumers with disability through the training provided in the workshop.





# 2.0 Auditing processes

## 2.1 The World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG)

To identify the issues in cancelling sim plans it is necessary to undertake both audits and user testing for the apps and websites represented by each provider. The audits in this project have been conducted in accordance with the standards provided by [W3C](#), that is the WCAG standards.

While the web revolutionised information and communication, the way in which information is presented was often incompatible with assistive technology products. As such, in 1997 the W3C launched the [Web Accessibility Initiative \(WAI\)](#) to ensure that people with disability were able to effectively access online information. This led to the creation of WCAG, designed to provide guidance to ICT professionals as to how content can be made accessible. Although the standard is called WCAG, it is also directly applicable to apps and thus is an appropriate standard supported by the AHRC to provide support for people with disability in the digital landscape.

The current version of the standard is [WCAG 2.2](#), which was published in 2023. WCAG 2.2 consists of four design principles—Perceivable, Operable, Understandable and Robust (POUR)—which in turn consist of 13 guidelines. WCAG is also recognised by the International Organization for Standardization (ISO) as standard ISO/IEC 40500, cementing its importance as the definitive world accessibility standard.

An overview of the four design principles and the thirteen guidelines are highlighted in the [WCAG 2.2 At A Glance](#) document which defines them as follows:

### Perceivable

- 1.1 Provide [text alternatives](#) for non-text content.
- 1.2 Provide [captions and other alternatives](#) for multimedia.
- 1.3 Create content that can be presented in [different ways](#), including by assistive technologies, without losing meaning.
- 1.4 Make it easier for users to [see and hear](#) content.

### Operable

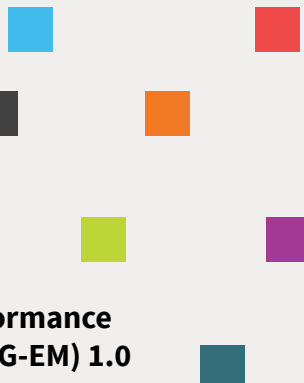
- 2.1 Make all functionality available from a [keyboard](#).
- 2.2 Give users [enough time](#) to read and use content.
- 2.3 Do not use content that causes [seizures](#).
- 2.4 Help users [navigate and find content](#).
- 2.5 Make it easier to use inputs other than [keyboard](#).

### Understandable

- 3.1 Make text [readable and understandable](#).
- 3.2 Make content appear and operate in [predictable](#) ways.
- 3.3 Help users [avoid and correct mistakes](#).

### Robust

- 4.1 Maximise [compatibility](#) with current and future user tools.




Within each of the guidelines are success criteria which provide specific, practical pass and fail guidance for website testing where relevant. This audit is based around these criteria to provide information as to what web accessibility issues are present within the applications and websites and how best to address them.

In relation to this report, the relevant success criteria are as follows:

- 1.1.1 Non-text Content
- 1.2.2 Captions (Prerecorded)
- 1.2.3 Audio Description or Media Alternative (Prerecorded)
- 1.3.4 Orientation
- 1.3.5 Identify Input Purpose
- 1.4.3 Contrast (Minimum)
- 1.4.4 Resize Text
- 1.4.11 Non-text Contrast
- 2.1.1 Keyboard
- 2.4.3 Focus Order
- 2.4.6 Headings and Labels
- 2.5.8 Target Size (Minimum)
- 3.1.5 Reading Level
- 3.2.3 Consistent Navigation

## 2.2 Website Accessibility Conformance Evaluation Methodology (WCAG-EM) 1.0

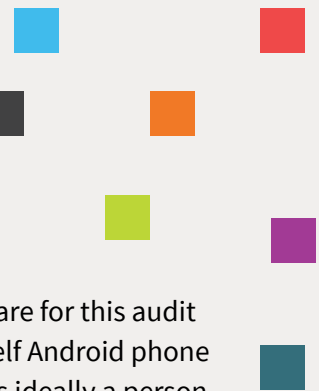


To ensure that the audits for the 44 telecommunication applications and associated websites were conducted in a professional manner, all auditing processes were followed in accordance with the [Website Accessibility Conformance Evaluation Methodology \(WCAG-EM\)](#). This is an approach created by W3C WAI for determining how well a website conforms to the WCAG standard. WCAG-EM 1.0 recommends structuring audit reports based on the following five-step evaluation procedure:

- [Step 1: Define the Evaluation Scope](#)
- [Step 2: Explore the Target Website](#)
- [Step 3: Select a Representative Sample](#)
- [Step 4: Audit the Selected Sample](#)
- [Step 5: Report the Evaluation Findings](#)

From September 2023 to April 2024, 44 audits were undertaken in accordance with the WCAG-EM 1.0 process. This included a selection of sample pages relating to typical consumer use of the websites to find cancellation and technical support information. The applications were tested on an Android mobile platform, and wherever an application was not available, the website was tested on the Android devices.

This is because the auditing team investigated both iPhone and Android apps during testing and found that based on early tests, most applications and websites were either the same or very similar to one another. Although there were some minor variations, the underlying issues were effectively the same. Notably, the cancellation procedure was the same in both operating systems. As such, a decision was made to progress the standardised baseline around Android devices to maximise the testing opportunities and ensure its affordability to the public and consistent functionalities.



## 2.3 Baseline

To effectively test websites and apps, a baseline needs to be established so the results are consistent across the apps and websites for the different audits. This includes the conformance target, web browsers, operating systems, assistive technologies, automated tools, and any other tests undertaken. All tests were carried out by CFA Australia's disability-led auditing team. All tools were the latest versions as of September 2023 unless otherwise stated. Applications were audited however where applications were not available, websites were audited instead.

The baseline used for the 44 telecommunications websites and associated applications are as follows:

- Conformance target:
  - > Criteria based around 4 disability groups, following WCAG 2.2 standards.
- Operating system:
  - > Android 13
- Browser:
  - > Chrome on Android
- Assistive technologies:
  - > TalkBack screen reader on Android
  - > Voice Access on Android
- Assessment tools:
  - > TPGi Colour Contrast Analyser

The selection of device and software for this audit was based on a typical off-the-shelf Android phone configuration. This is important as ideally a person with disability should be able to simply purchase a stock mobile device and access the content online without the need for extra accessibility programs.

The selection of device and software for this audit was based on a typical off-the-shelf Android phone configuration. This is important as ideally a person with disability should be able to simply purchase a stock mobile device and access the content online without the need for extra accessibility programs. The four disability groups defined in this report are as follows:

- Vision contains testing for screen reader capabilities, colour contrast and application of universal accessible settings. This includes orientation, resizing text, colour themes, and magnification within the smartphone.
- Hearing contains testing for captions/transcripts for audio-related media, as well as checking if the SIM provider has the ability to connect with a TTY or whether an appropriate TTY alternative is mentioned. Many of the difficulties faced by people who are Deaf or hard of hearing also apply to people who are non-verbal as the primary issue highlighted is the need to make a phone call to cancel a plan.
- Mobility contains onscreen keyboard accessibility, voice control capability and touch gestures. Onscreen keyboards appear when text inputs are required such as login boxes and cancellation windows. Voice Control assesses the efficiency of navigating to cancellation options solely through speech. Touch Gestures assesses target size to support people with hand tremors, poor dexterity or other related mobility impairments.
- Cognitive includes language assessment to ensure content is written to a lower secondary reading level. Consistent page layout and navigation is also assessed. Cancellation options are checked for their intuitive location and that they do not require an external link.

# 3.0 Sector-wide results

While the ability to satisfy WCAG 2.2 criteria provides technical guidance as to which SIM provider’s application or website was the most accessible, user testing suggested a different ranking order.

To highlight the findings, the data tables provide a result summary. This summary is defined as follows:

- RED** = all success criteria in this guideline have failed.
- AMBER** = some success criteria in this guideline have passed and some have failed.
- GREEN** = all success criteria in this guideline have passed.
- NOT APPLICABLE** = the success criteria did not apply to the testing process.

Across the telecommunications industry, the effective cancellation support for people with a vision, hearing, mobility, and cognitive disability is as follows:

	Level of support		
Disability group	Red	Amber	Green
Vision	30%	70%	0%
Cognitive	0%	55%	45%
Mobility	4%	57%	39%
Hearing	50%	46%	4%

Some key findings were that:

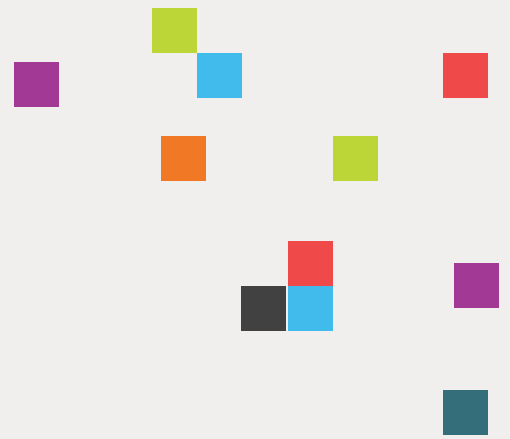
1. All SIM providers have the ability to enhance their content’s accessibility;
2. The vast majority of SIM providers have some understanding of accessibility, however problems with accessibility continue to develop, particularly for people with a vision or hearing disability;

3. There are several significant accessibility problems that SIM providers do not seem to be aware of, requiring the implementation of new procedures based on informed guidance.

The sector-wide results indicate that significant issues in cancelling SIM plans are of particular difficulty for people who are blind or have low vision, and people who are Deaf or hard of hearing. Tests suggest that for people who are blind or have low vision, there are key issues in both the ability to use assistive technologies to effectively access the app or website needed to cancel, and the accessibility of the app or website itself. The combination of these two factors creates a double accessibility issue meaning that even if a majority of SIM providers are somewhat accessible in principle, one of these issues is likely to impact the user journey in trying to cancel a SIM plan.

For people who are Deaf or hard of hearing, it may be the case that it is possible to cancel a plan via text chat where available, however it is clear that for many SIM providers, calling on a phone is the only option provided and with no TTY support or alternative available, this restriction makes it very difficult in many scenarios for a plan to be cancelled. For mobility and cognitive disabilities, it is more likely that people will succeed in the cancellation process, however even with these providers there are still less than half that ensure effective access to cancellation processes. Challenges in locating the cancellation option and understanding the cancellation process remain in effect for the majority of providers and as such it is likely that these disability groups will also find the cancellation process difficult.





The common vision related WCAG issues include colour contrast and universal accessible settings, while for cognitive the most common WCAG issue was consistent page layout. The common WCAG issue for mobility was missing labels for voice control. While there was no WCAG specific issue for the hearing category, it was common to not reference any TTY services that may support people that are Deaf or hard of hearing to make a call. This was despite the fact that for many providers, calling was the only way to cancel a service.

Although a majority of SIM providers do have access issues, there are some standout companies which have made every effort to ensure access across all four disability groups. In relation to large companies, Telstra was a standout with accessible options for hearing, mobility and cognitive disabilities and relatively minor issues faced by people who are blind or have low vision. Of the smaller providers, Catch Connect achieved the same overall rating, with effective support for hearing, mobility and cognitive as well as some room for improvement in supporting people who are blind or have low vision.

When comparing telecommunications companies with a larger amount of resources, such as Telstra, Optus and Vodaphone/TPG there is a notable improvement in accessibility across the three companies compared to the overall outputs of smaller providers. The three companies combined only received one fail which was Vodaphone/TPG's support of people who are Deaf or hard of hearing. By comparison, the smaller SIM providers have more mixed results, however Catch Connect still offers better results than both Optus and Vodaphone/TPG, suggesting that while bigger companies may have more resources to put into digital access improvements, there are no limitations on smaller players from ensuring accessibility cancellation support.

A full assessment of all 44 telcos can be found in Appendix A. a detailed analysis of all Sim providers in relation to the WCAG standard and user testing can be found in the supporting document "Cancellations for All WCAG and User Testing Data."



# 4.0 Specific accessibility criteria

## 4.1 Conformance Achievements

There were some areas where the majority of mobile SIM providers showed a good understanding of accessibility, namely simple use of language, onscreen keyboard accessibility, and captions for videos. These could be improved somewhat but were generally implemented.

### 4.1.1 Use of Language

SIM providers were largely compliant with the necessity to cater for people with diverse reading abilities, however in certain scenarios, some terminology was not targeted at a lower secondary reading level. An example of this were FAQs being tagged with article codes rather than titles or subject matter descriptions. However, this would be an easy fix with the use of Plain English language for descriptors of content. There is an associated [Plain Language ISO \(24495-1:2023\)](#) that could aid in this area, with advice provided on how to adapt language to make it accessible.



#### 4.1.2 Onscreen Keyboard Accessibility

Onscreen keyboard access was generally well laid out by all 44 SIM providers. This shows that there is an appropriate understanding of keyboard usage and how it may vary from one user to another. A possible example of a keyboard accessibility issue though would be an onscreen keyboard requiring an input by the user instead of being automatic upon entering an input field. This could be easily fixed by allowing automatic keyboard activation upon the user's interaction with an input field.

#### 4.1.3 Video Captioning

Although videos were uncommon within the applications and websites of most of the SIM providers, it is important to note that for people who are Deaf or hard of hearing, captions must be provided on all videos in order to make the video content accessible for all.

### 4.2 Key Issues

#### 4.2.1 Phone Call to Cancel Service

Based on user-testing for the ease of cancellation, it was found that a vast majority of the 44 SIM providers required users to give a phone call to cancel a service. This seemed unnecessary since the sign-up process for almost all these services could be done solely online, which included the uploading or sending of important personal details. The issue that evolves from the need for a phone call is linked to the lack of TTY availability as well as other circumstances such as a speech disability. For these users, they would not be able to cancel their mobile service easily and effectively due to the lack of alternative options to cancellation. Although some providers facilitated the ability to cancel a service through a live chat within the user's account, this chat function may not be accessible to assistive technologies either. Only a handful of providers enabled users to cancel the service themselves through a button on the application or website within the user's account.

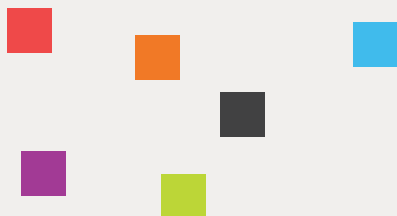
This is an issue as people with disability who are unable to make a phone call themselves would not be able to disconnect their service easily as only the primary account holder can start the process. Another issue is that people with disability who can make a phone call but are unable to acknowledge and respond to the relevant information appropriately through a phone call, would not have any other means of cancellation available to them. This is a big concern for people with disability who live by themselves and may not be able to cancel their service with these methods.

#### 4.2.2 Support Options

As part of the user-testing experience in direct relation to cancellation of a SIM service, support options were broken up into 4 separate categories:

1. Phone Line Support
2. TTY Service
3. Online and AI Chat Function
4. E-mail Support

For phone line support, SIM service providers were tested based on the easy availability of a phone number to call for support. However, as people that are Deaf or hard of hearing may not be able to facilitate a phone call, the availability of a TTY service was the next support option that was sought after. It was found that the majority of SIM providers did not have a dedicated TTY service, nor did they provide any recommendations or suggestions to an external TTY service for use. Consequently, for most of these SIM providers, a new user who is Deaf, for example, would need to source their own TTY service and link it to their service provider themselves to achieve any form of verbal and instant communication.



It was also found that although some services facilitated a live online chat function, many only provided AI chat services, which would often lead to an inability to achieve the intended outcome of support, especially with cancellation processes. When a chat system starts with AI, this project has demonstrated that it is inherently difficult to tell the AI when a consumer wishes to end their service. Rather, the AI wants to provide resolutions to issues without cancellation and are difficult to bypass in order to reach a human. Experiences varied between starting with AI, where it was almost impossible to get to a human to request cancellation, compared to providers that did have a human as a starting point. The inconsistency that chats provide, along with how it works affected the ability to cancel and was identified as a significant issue in this project. In addition, some SIM providers did feature a separate cancellation button, only for it send the user to a chat screen when clicked, forcing the user into an AI chat conversation instead of simply cancelling the service as indicated.

In terms of e-mail support, there was a split in the availability of support email addresses being given to users. E-mailing is often the means for a person with a cognitive disability, who may have speech difficulties, to communicate their need for assistance.

#### **4.2.3 Frequently Asked Questions (FAQ) Section**

As the main objective of the ‘Cancellations for All’ project was to discover how accessible the cancellation processes for SIM providers were, user-testing focused heavily on the FAQ section, which would, or is expected to, provide details on how a user may cancel their service. Delving into the FAQ sections for various SIM providers, many providers were found to either not include cancellation details within their FAQ, or made it extremely difficult to find this information. This was unlike the support for the sign-up process, which was largely well written and easily found.

Being able to find cancellation information on a website or application’s FAQ should be as seamless as information on signing up or activation of a service, as both involves the usage of a SIM. Without appropriate information on cancellation in the FAQ section, people with disability would have to navigate their way through an application or website, which may not be accessible to them, to find this information. In addition to this, if they are unable to make a phone call to their service provider, they would be left stuck within their service.

#### **4.2.4 Location of Cancellation Option**

Outside of the FAQ as well, it was notably difficult to find the cancellation option, whether as a button or link, within many providers’ interfaces. It is our view that the hiding of the cancellation option under several menus, or sometimes not present at all, may be intentional to prevent the user from cancelling their plan. This is especially prevalent given how prominent information regarding the upgrading of plans was within these apps and websites.

#### **4.2.5 Colour Contrast**

Following the WCAG 2.2 standard, a minimum 4.5:1 colour contrast ratio is required for foreground, background and text-based content. There is also a requirement for a 3:1 colour contrast ratio for user interface elements such as menu buttons. However, the applications and websites within the telecommunications sector all shared similar issues with colour contrast. Throughout the user account navigation, there were colour contrast problems with the applications and websites that were assessed. These were based upon general application or website navigation, as well as a focus towards finding information on service cancellation. As a result of this, people who are blind or have low vision would find it difficult to view certain content online. In some scenarios, this may lead users to be unable to find the means to cancel their service or even a support option to assist them with cancellation.





#### 4.2.6 Screen Reader Capabilities

Screen readers provide text-to-speech output for any users who are blind or have low vision. These tools range from reading texts to identifying different page elements such as that of images, buttons, headings, and form fields.

A particular issue that impacts predominantly screen reader users is a lack of alternative text. It was noted in our research that many apps did not have alternative text for its images and buttons, or that labels were not effective. For example, sometimes screen readers would read out information such as ‘text title,’ ‘modal layout,’ and ‘icon font.’ There is a clear need to ensure that all buttons and images should have appropriate, concise and descriptive alternative text, or should be marked as decorative where appropriate.

Other issues such as improperly labelled buttons and inaccessible forms also hinder the effectiveness of screen readers. Consequently, users encounter barriers when attempting to manage their accounts or access essential services, such as cancellations, independently.

#### 4.2.7 Universal Accessible Settings

The global settings of a mobile phone have accessibility advantages that a service can utilise to allow for ease of access. If these settings are improperly applied on an application’s interface however, users may not be able to independently use and navigate through the application’s features. Through user-testing, it was found that the application or website interface for a large number of SIM service providers did not support the universal accessibility settings on the mobile phone being used. This included the ability to change the orientation of a page from portrait to landscape, the resizing of text size, and colour themes such as dark mode. This could lead people with low vision to be unable to interact with their user account with the accessibility features set on their mobile device, ultimately not allowing easy access to service information and cancellation options.

#### 4.2.8 Consistent Page Layout and Navigation

Another consistent issue is navigation. WCAG 2.2 Success Criteria that relate to navigation includes the need to ensure that there is consistent navigation within web interfaces. All telecommunication apps and websites had challenges in our user testing. One of the issues included an inconsistent navigation experience between the user portal and the main website with no mechanism to return to other pages. In several applications, links took the user out of the application, to a website. This would cause great confusion for screen reader users, as well as people with a cognitive disability who are unfamiliar with the change in navigation. Ideally, the experience should always remain in the application, and should not have a change of interface. Ensuring that consumers with disability have a consistent experience navigating around application or website content, whether to check data usage, to log into a secure part of the website, or to find support services to cancel a service needs to be operable, intuitive, and effective.

#### 4.2.9 Voice Control Capability

Voice Control supports users with navigating a page and inputting written text within form fields using only their voice. This removes the need for the user to manually type in information through a keyboard. Through user-testing, the majority of SIM providers had applications or websites that were highly accessible to this assistive technology, however, there were scenarios where there were overlapping icons or content missing labels. For a person with disability who lives independently and relies on voice control to go about their online services, an application or website which does not facilitate this appropriately would not allow them to access any SIM-related services independently online. This becomes particularly important should they wish to cancel their mobile phone service but are unable to do so. All applications and websites, especially for service providers, should be highly accessible to Voice Control assistive technologies to ensure equity in usage of online services.



#### **4.2.10 Touch Gestures (Target Size)**

In accordance with WCAG 2.2 Success Criteria, any interactive element must have a large target size so strain and misinputs can be avoided. This is vital for users who might experience difficulties activating a small target due to hand tremors, poor dexterity, or other related mobility or vision impairments. Throughout the testing process, it was found that many SIM providers applications contained various buttons and links that were either too small or were spaced too close to one another. For a person with a mobility impairment, this could cause them to be unable to easily process touch gestures on their mobile device, while causing identification issues for people with low vision.

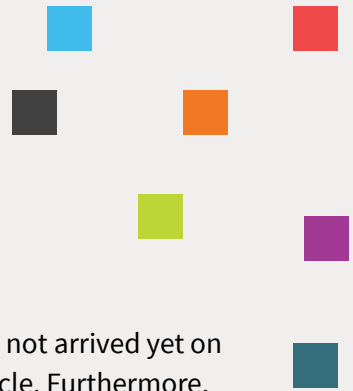
#### **4.3 Related Findings**

These two issues are discussed in more detail in a separate report “Signup and Payment Challenges Associated with SIM Mobile Plans.”

In addition to the cancellation issues associated with this project, our user testing revealed two other significant issues which are as follows:

Throughout the acquisition of pre-paid SIM plans, we encountered great inconsistencies with regards to the documentation required for a sign-up. These requirements varied, ranging from no need for identification to requiring 100 points worth of identification just to set up an account and SIM for a pre-paid mobile service. This could cause distress to people with disability who may not be able to provide certain documentation or may have difficulties in filling inaccessible forms.

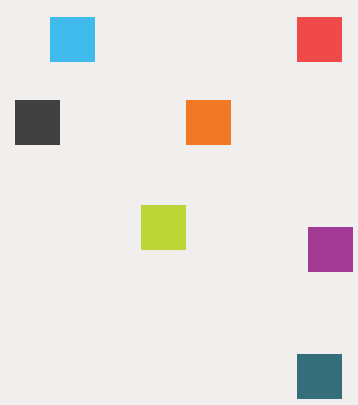
We believe that a more consistent form of identification should be set in place for mobile service providers so that all consumers, not just people with disability, would be able to efficiently attain their SIM service without any worry of complicated processes.



In several instances, we encountered invoices being sent to us despite the SIM not being activated on our end yet. This was particularly worrying in scenarios where the payment start date was set as the day of delivery. Although it can be expected that most people who are looking to get a new mobile service would be eager to collect their SIM immediately, the protocol of starting a payment cycle does not accommodate to people who are unable to collect their SIM immediately if a delivery attempt was unsuccessful.

On some occasions, the SIM had not arrived yet on the start date of the payment cycle. Furthermore, for people with disability who require assistance to activate their service upon receipt of their SIM, this may not be provided to them immediately. Like the sign-up process, the start of a payment cycle should be made consistent with the actual activation of the SIM by the consumer. This would not only allow telecommunications providers to avoid misunderstandings with their client base, but it would support more ethical and transparent payment protocols. Thus, people with disability would not have to entirely go through highly inaccessible fine-print documents to gain payment cycle information.





## 5.0 Conclusion

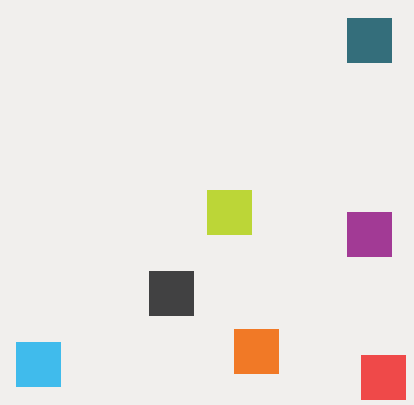
The ‘Cancellations for All’ project endeavoured to identify the key issues that are preventing people with disability from cancelling their phone plans based on a combination of user testing and assessments against the WCAG 2.2 standard. At the conclusion of testing the app or website of 44 SIM providers, it has been clearly identified that people with disability, particularly people who are blind or have low vision and people who are Deaf or hard of hearing face the greatest challenges.

For people who are blind or have low vision, the issues are compounded due to a combination of access issues relating to assistive technologies such as screen readers and issues related to an inaccessible app or website such as a lack of colour contrast and navigation challenges. For people who are Deaf or hard of hearing, the requirement of any SIM providers to make a phone call to cancel a plan without an alternative makes this process very difficult. Other disability groups such as people with a mobility or cognitive impairment are likely to still face challenges, but many SIM providers have made the effort to ensure that onscreen keyboards appear when required and information is written to a lower secondary reading level.

However, support mechanisms in trying to address issues are not consistent between SIM providers and it is very difficult when purchasing a SIM plan to have an understanding upfront as to how to cancel it based purely on the information available from the SIM providers.

The output from this project as noted in Appendix A has identified some standout providers, including Telstra and Catch Connect who appear to have largely accessible or somewhat accessible services across all disability groups which is a welcome discovery. Through the data provided in this report and associated supporting document containing WCAG and user testing data, consumers can make informed decisions based on the coverage of a company in their area, the SIM provider that uses that coverage, and if the cancellation process will support them if they wish to cancel that plan.

CFA Australia would like to acknowledge and thank the support of ACCAN in being able to undertake this research. The full table in Appendix A is available on the CFA Australia website and will be regularly updated to continue supporting the needs of people with disability. Over time, the table in this report when compared to the updated table on the CFA Australia website will provide a helpful comparison in mapping improvements in telco providers over time.

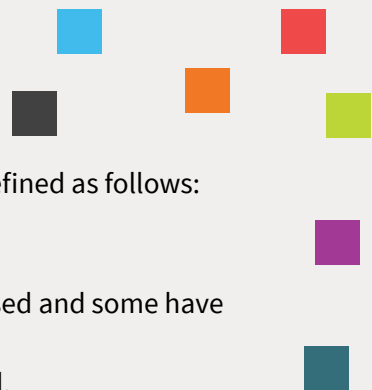




# Appendix A:

Accessibility results based  
on four disability groups  
(Vision, Cognitivem Mobility  
and Hearing)





To highlight the findings, the data tables provide a result summary. This summary is defined as follows:

















































**RED (Top shaded)** = all criteria within this disability requirement have failed.


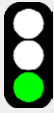

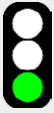

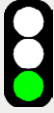







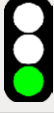











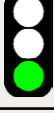







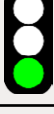







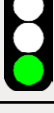










**AMBER (Middle shaded)** = some criteria within this disability requirement have passed and some have failed.

**GREEN (Bottom shaded)** = all criteria within this disability requirement have passed.

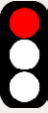







































## User Efficiency Table

	Accessibility of Application or Website based on Disability Group			
SIM Provider	Vision	Cognitive	Mobility	Hearing
AGL				
Aldi Mobile				
Amaysim				
Aussie Broad-band				
Australia Post				
Belong				
Bendigo Telco				
Better Life				
Boost Mobile				

	Accessibility of Application or Website based on Disability Group			
SIM Provider	Vision	Cognitive	Mobility	Hearing
Catch Connect				
Circles.Life				
Coles				
CMobile				
Dodo Mobile				
E.Tel				
Exetel				
Felix Mobile				
Flip				
Goodtel				
iiNet				
iPrimus				

	Accessibility of Application or Website based on Disability Group			
SIM Provider	Vision	Cognitive	Mobility	Hearing
JB HI-FI				
Kogan				
Konec				
Lebara				
Lyca				
Mate				
Moose				
More				
NuMobile				
Optus				
Pennytel				
Southern Phone				
Spintel				

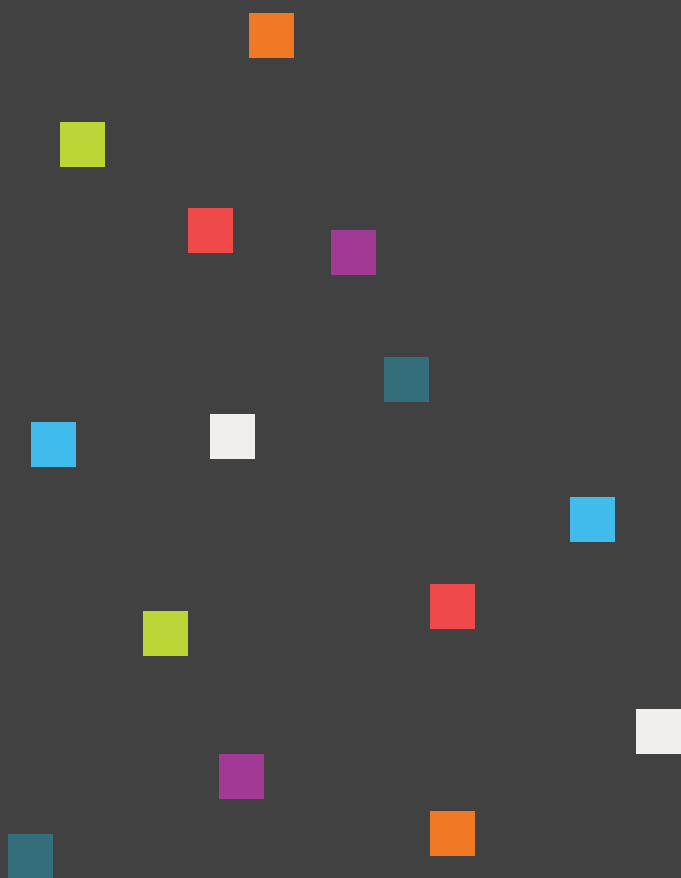


	Accessibility of Application or Website based on Disability Group			
SIM Provider	Vision	Cognitive	Mobility	Hearing
Superloop				
Swoop				
Tangerine				
Telechoice				
Telstra				
Think				
TPG				
Vodafone				
Woolworths				
Yomojo				

Other SIM providers which were attempted to be tested but could not be completed include Escapenet, Internode Mobile, GOMO, Reward Mobile, Vaya Mobile, Accord, and Telsim.



Celebrating an  
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