

**ABF response to:
Joint Standing Committee on the
National Disability Insurance Scheme:
Inquiry into transitional arrangements for the NDIS
August 2017**

About the Australian Blindness Forum

The Australian Blindness Forum is the peak body representing blindness, low vision and rehabilitation in the blindness sector. ABF was formed in 1992 and is funded only by its members. ABF is an Australian public company limited by guarantee and governed by a Board of Directors.

Membership of ABF is open to any organisation that has as its primary objects the provision of services to people who are blind or vision impaired, or whose activities are substantially connected with the welfare of people who are blind or vision impaired. ABF is represented in every state and territory of Australia.

As Australia's representative to the World Blind Union, the ABF has strong connections with the international blind and vision impaired community. ABF comprises 15 blindness sector organisations whose expertise and knowledge are reflected in the following comments.

Background

ABF appreciates the opportunity to provide a response to the Joint Standing Committee on the National Disability Insurance Scheme – Inquiry into transitional arrangements for the NDIS (the Inquiry).

ABF and its member organisations support every person's right to participate in and contribute to the community. This includes all people who are blind or vision impaired having the right to access services and technology and to live independently, inclusively and with dignity in the community.

This position is consistent with:

- the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- National Disability Strategy 2010-2020 (NDS)
- the Disability Discrimination Act 1992 (DDA).

Overall, ABF is concerned that the transitional arrangements for NDIS have exposed negative consequences for people who are blind or vision impaired including in relation to the interface with other programs and schemes; the development of plans and delivery of services and through the roll out of the Information, Linkages and Capacity Building Program (ILC).

Under the present NDIS transition arrangements people who are blind or vision impaired are substantially worse-off in relation to the services and support they are receiving. Further, those over the age of 65 and those not eligible for the NDIS are also worse-off due to the failure of ILC to provide sufficient program funding to fill the gaps left by the implementation of the NDIS. This is contrary to the NDIS principle of “no disadvantage”.

ABF Response

ABF has the following specific response to the terms of reference:

Inquiry into the transitional arrangements for the NDIS, with particular reference to:

- a. the boundaries and interface of NDIS service provision, and other non-NDIS service provision, with particular reference to health, education and transport services**

The introduction of the NDIS has meant that many different services and programs need to interface with the NDIS. The transitional arrangements have had an effect in the following ways:

- **Health** – the introduction of the NDIS has meant that people who are blind or vision impaired who are over the age of 65 now form part of the aged care sector. These people do not have the same generic aged care needs as others in the sector as their needs are specialised. The boundaries between disability services and aged care services are now blurred and there is no clarity around the promised continuity of support for all people with disability who are not eligible for the NDIS and who now are part of the aged care sector
- **Transport** – the future of schemes such as the Mobility Allowance and taxi subsidy schemes are currently in question and the interface between the NDIS and transport schemes is unclear. For example, there is a Bill before Parliament proposing to roll the Mobility Allowance into the NDIS. The Mobility Allowance is a transport allowance for people with disability and has always been crucial to maintaining employment with the flow-on effects of independence and social interaction for people who are blind or vision impaired. ABF is concerned that the proposed Bill transferring the Mobility Allowance into the NDIS will have detrimental effects on people who are blind or vision impaired who are not receiving an NDIS package due to ineligibility, particularly if they are over the age of 65.

- **Education** – the interface between the NDIS and the education system has created a blurring between education/schooling and community involvement and family support. The NDIS says it provides support for ‘participants to attend school education’ while the education system is said to have responsibility for ‘assisting students with their educational attainment’. This interface is not always clear and not always appropriate as it prevents families and communities from obtaining a holistic approach to a child’s needs while they are of school age.

b. the consistency of NDIS plans and delivery of NDIS and other services for people with disabilities across Australia

Currently, the NDIS plans that have been developed for people who are blind or vision impaired have been inconsistent and not tailored to the specialised needs of people who are blind or vision impaired.

Blindness is a type of disability that is different to many other disabilities in that people do not need personal support (such as carers or personal care daily). Many of the NDIS plans that have been developed so far for people who are blind or vision impaired have demonstrated that the generalist planners and assessors have a lack of understanding of blindness or low vision including the impact of vision loss and the particular equipment and supports that are required, such as assistive technology and the adaptation of mainstream technology.

People who are blind or vision impaired tend to have episodic needs – this means their needs change and vary at different times which results in people accessing services and supports in an episodic, iterative and unpredictable way. For example, this may be due to assistance being required if someone moves house or jobs or their vision loss changes in some way. Further, people who are blind or vision impaired do not necessarily require a new plan every year but do need to remain in the NDIS as they have a permanent disability and require access to support when it is needed without having to retell their story. These types of needs make the current NDIA planning process very difficult for people who are blind or vision impaired to obtain the services and supports they need.

People who are blind or vision impaired need to be referred to specialist assessors with expertise in the blindness sector for NDIA planning and assessment to ensure accurate plans are prepared for participants and appropriate supports are recommended. This in turn will reduce costs for the NDIS in the long-term.

Further the NDIA continues to provide participants who are blind or vision impaired with information and materials, including their own plans, in formats that are not accessible to that participant. It is unacceptable for a disability agency whose sole purpose is to assist people with disability to not have a sufficient understanding of disability to the extent that they cannot provide participants with appropriate information.

c. the rollout of the Information, Linkages and Capacity Building Program

ABF notes that the range and type of services initially promised to be funded under the ILC program has changed substantially. The original proposal was that ILC would reflect the “Tier 2” programs including block funding and early intervention programs. The goal of this was to continue to provide disability services to those who were not eligible for the NDIS. Now, the way the ILC program has been developed, it covers only tools and awareness programs, delivered by mainstream services for a limited time or on an ad hoc basis.

The ILC program as it currently stands is not going to provide any useful ongoing services and it will not help ensure individuals do not fall through the cracks – that will be done by the existing specialist service providers such as those in the blindness sector who, for many years, have been providing services free-of-charge to people with disability and will have to continue to do so despite substantial reductions in funding. Unless block funding or funded programs are created, resources and necessary skills will be lost and each disability group will lose their specialty.

The terms of reference also state that the committee will have regard to:

- i. the Bilateral Agreements between the Commonwealth and State and Territory Governments**
- ii. the Operational Plans between the Commonwealth and State and Territory Governments**
- iii. the risks borne by the Commonwealth and State and Territory Governments in the rollout of the NDIS nationally**
- iv. NDIS decision-making processes, particularly in relation to the Disability Reform Council and COAG**
- v. the impact on rural and remote areas, with particular reference to Indigenous communities.**

ABF is of the view that there are too many different agreements across Australia. This results in a political “blame game” between states, territories and the federal government, rather than a strategic approach to the transition of many different state and territory programs to the NDIS as well as the transition to other programs for non-eligible people with disability or the aged care sector.

ABF also continues to have ongoing concerns that the eligibility criteria for the NDIS excludes millions of people with disability, in particular, people with disability over the age of 65. This, together with the withdrawal of block funding for disability programs, has reduced disability services in states and territories and threatens the viability of specialist service providers.

Conclusion

ABF reiterates that it is concerned that the transitional arrangements for NDIS have resulted in negative consequences for people who are blind or vision impaired.

Flexibility is required to ensure people with disability are not disadvantaged by the transition of many disability programs to the NDIS, especially those who are not eligible for an NDIS package, such as people with disability over the aged of 65. With measures such as block or program funding, specialist disability sectors such as the blindness sector, can continue to provide services to consumers and continue to remain viable.