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Vision Australia Submission to the

Senate Community Affairs Legislation Committee

Social Services Legislation Amendment (Transition Mobility Allowance to the
National Disability Insurance Scheme) Bill 2016

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Vision Australia appreciates the opportunity to provide comment on the Social Services Legislation Amendment (Transition Mobility Allowance to the National Disability Insurance Scheme) Bill 2016. We would be happy to provide any clarification or further detail that the Committee may request.

Our key points of concern about the Mobility Allowance transitioning into the National Disability Insurance Scheme (NDIS) are as follows:

- Inaccessibility of NDIS related information including registration forms, resulting in non-participation in the scheme despite eligibility, and subsequent exclusion from the Mobility Allowance;
- Exclusion for people who choose not to participate in the NDIS due to administrative burdens of the scheme;
- Personal and communal hardship arising from the 66% reduction in the continuation period;
- Exclusion for people over 65 who are not eligible for the NDIS.

Barriers to NDIS Participation

Vision Australia has been a strong supporter of the NDIS from its inception, and we believe that it offers people with disability in general, and people who are blind or have low vision in particular, unprecedented opportunities to achieve their life goals and participate more equally in all aspects of community life. We have assisted a growing number of our clients to participate in the NDIS, and we also provide a range of services for which participants may seek NDIS funding.

Our extensive experience working with clients has reinforced the potential benefits of participation in the NDIS, but we have also become aware of a number of barriers that prevent or deter some of our clients from participating, in spite of their eligibility to access the NDIS. The most significant of these barriers is the lack of information and documentation in accessible formats such as braille, large print and e-text. Some of our clients have reported that they have been unable to register for the Scheme because the NDIA has been unable or unwilling to provide them with a registration form that they can read. Other clients have noted that they cannot obtain a version of their individual NDIS plan in a format that they can read, and have expressed that the NDIA is not being proactive in providing information in a range of accessible formats.

Vision Australia has emphasised the importance of accessible NDIS-related information on numerous occasions, and it is most disappointing that it is still not readily or universally available. People who are blind or have low vision require information in accessible formats, and if it is not available then they are significantly

disadvantaged, since information is essential for decision-making and participation in all aspects of the Scheme.

We draw attention to this barrier in the context of the current Bill because we are very concerned that some of our clients who currently rely on the Mobility Allowance to assist their travel to and from work, may find the barriers to participation in the NDIS insurmountable, in which case they will lose the Mobility Allowance and may not be able to remain employed or engaged in job-seeking activities. There must therefore be a recognition that not all people who are blind or have low vision are able to participate in the NDIS, even though they are eligible to do so. This non-participation is through no fault of their own, but results from barriers that could and should be removed, and which so far remain largely unaddressed. People should not be disadvantaged if they are unable to participate in the NDIS because of a systemic failure to provide necessary information and documentation in formats that people who are blind or have low vision require. The Mobility Allowance must continue to be available to people in this position.

We therefore ask the Committee to give due recognition to the fact that in practice there are barriers that are making it very difficult or impossible for some of our clients to participate in the NDIS, and changes to the administration of the Mobility Allowance must take this unfortunate situation into account.

Minimal Benefits from Participation

Some of our clients have chosen not to participate in the NDIS because they do not believe they would derive much benefit from it. For example, people who are employed and who require specialised equipment such as adaptive technology obtain funding through the Job Access Scheme, which is, and will remain, separate from the NDIS. They may also only need occasional services, such as Orientation and Mobility training from Vision Australia, and so do not feel that having to deal with the complexity of the NDIS registration, assessment, planning and management processes is justified in view of the minimal support that they would receive. Again, people in this position should not be disadvantaged by losing the Mobility Allowance just because the NDIS does not offer them any other significant benefits.

Reduction in "Continuation Period"

The Bill proposes to reduce the "continuation period" from 12 weeks to 4 weeks. We have no doubt that such a change would have a serious detrimental impact on many of our clients.

Research conducted by Vision Australia in 2012 found that 58% of people who are blind or have low vision are unemployed, and not by their own choice. This compares with 14% for the general population, and it is also much higher than the unemployment rate among people with disability in general.

Our research also found that 40% of job-seekers who are blind or have low vision have been looking for work for between one and five years, and 10% have been trying to find employment for more than five years.

It almost always takes a person who is blind or has low vision much longer to find new employment after they leave an existing job. Similarly, it usually takes much longer than four weeks for a person who is blind or has low vision to find a volunteering role if they wish to do so.

The distressingly high unemployment rate, as well as the length of time involved in job seeking, are a stark reminder that people who are blind or have low vision face many systemic and attitudinal barriers as they attempt to participate fully in the community. For many, the Mobility Allowance is an essential support as they try to overcome these barriers that our society has constructed.

We believe that the proposed 66% reduction in the "continuation period" will make it even harder for people who are blind or have low vision to participate in the workforce, and we do not believe that the meagre financial savings that might result can be justified by the personal and communal hardship that will follow.

People Aged Over 65

There are approximately 350,000 people in Australia who are blind or have low vision. Around 70% of these are aged 65 and over. This is a consequence of the fact that blindness and vision loss are primarily age-related, due to such factors as macular disease and diabetic retinopathy.

The NDIS is not available to people who are 65 and over at the time the scheme comes to their area, including people who are working or looking for work. This means that a person who is blind or has low vision, is over 65, and is working, will lose the Mobility Allowance that they are currently receiving once it is transitioned into the NDIS. We have repeatedly been assured that there will be "continuity of support" in various programs, but so far there has been little if any detail provided about how these will operate. In the context of the Mobility Allowance, we do not know, for example, whether a person over 65 who currently receives the Allowance could re-apply for it, if they left the workforce for one reason or another but later re-entered it. There is also no information about how continuity of support for the

Mobility Allowance would be routinely administered, and how eligibility criteria would be determined.

We are also most concerned that the proposed transition arrangements make no provision for the Mobility Allowance to be available to people who acquire their blindness or vision loss after 65 years of age. Because these people would not have previously had a disability, they would not have received the Mobility Allowance, and therefore they would not be covered by any continuity arrangements that are put in place by the Bill. They can, however, apply for the Mobility Allowance under the current arrangements and eligibility criteria.

On the one hand, the Government is encouraging people to work past 65, and raising the pension age, but on the other, it appears to be reducing the amount of support for people who acquire a disability and wish to meet these expectations of an individual's longer working life.

Conclusion

While we appreciate that the Government is keen to transition current programs and benefits into the NDIS, we are not convinced that this is being done in ways that acknowledge the practical, real-life impact that such transition will have on the blindness and low vision community. People who are not able to participate in the NDIS must not be disadvantaged by losing supports that they currently receive or for which they would be eligible under the current arrangements.

We ask that the Committee carefully consider the broader impact that the transition of the Mobility Allowance will have, and not simply assume that the NDIS is, or ever will be, a universal catch-all for the needs of people with a disability. The Mobility Allowance is a modest but essential support for many people who are blind or have low vision, or who will acquire a vision loss in the future. Allowing administrative convenience to take precedence over supporting people to live independently and with dignity in the community will do nothing to alleviate the social inequality and economic disadvantage that many people who are blind or have low vision face.

About Vision Australia

Vision Australia is the largest provider of services to people who are blind, deafblind, or have low vision in Australia. It was formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families. The service delivery areas include:

- early childhood
- orientation and mobility
- employment
- accessible information (including library services)
- recreation
- independent living
- Seeing Eye Dogs
- advocacy, and working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with our 27,500 clients and their families, and also through the involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community about the challenges faced by people who are blind or have low vision, fully participating in community life.

Vision Australia is a registered My Aged Care and NDIS provider. We have a vibrant client consultative framework, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 14.5% of total staff having a vision impairment.

Vision Australia also has a formal liaison arrangement with Blind Citizens Australia (BCA) through a Memorandum of Understanding for a number of purposes, including collaboration, so that Vision Australia's systemic advocacy and public policy positions are, wherever practicable, consistent with the programs and policies of Australia's peak body representing people who are blind or have low vision.