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

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About Blind Citizens Australia

Blind Citizens Australia is the peak national representative organisation of people who are blind or vision impaired. Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs.

Blind Citizens Australia is pleased to have the opportunity to comment on the amendment to legislation which would see the mobility allowance be transitioned into the NDIS, as part of the support available under that scheme. There are however, some grave concerns that need to be addressed fully, so that the wellbeing of people who are blind or vision impaired who are not eligible for the NDIS will be assured. These changes will affect people with other types of disability who are not eligible for the NDIS in similar ways.

The Importance Of The Mobility Allowance

The mobility allowance has historically insured that the disability related and non-optional costs for people eligible for this allowance are met at least partially. People eligible for the allowance are of course undertaking training which may lead to employment, or making valuable contributions to their communities and to society more broadly, through voluntary work in a variety of fields.

Non-optional costs can include transport to and from training venues or community facilities where voluntary work takes place. Transport costs are incurred particularly where it is not possible to access public transport, or where using public transport is not practical due to the time it may take to reach one's destination because of the design of transport routes for example. A destination may be in a neighbouring suburb, but it makes no sense to use public transport to get to it if one has to catch a bus or train into the city in order to change routes or lines, just to travel out of the city again. In such a situation, it is much more practical and convenient to catch a taxi. This is the kind of cost that the mobility allowance assists to offset.

Adaptive technology is also a non-optional cost in many situations where people are training or undertaking voluntary work. The extra money per fortnight that the mobility allowance provides, might allow a person to save for a piece of technology or software which will enable them to undertake specific tasks. An electronic labelling device may be needed for example, to label files in an office, or CD's in a music collection at a community radio station where a person who is blind or vision impaired may volunteer. Subsidies for equipment are generally not available unless a person who requires adaptive technology is employed.

While it may appear that this lack of available support for such equipment will no longer be an issue once the NDIS is fully rolled out, the truth for many people, is quite the opposite, if they will not be eligible to be supported by the NDIS.

The Majority Of People Who Are Blind Or Vision Impaired are Over Age Sixty-five.

Many people who have received the mobility allowance up until now are over age sixty-five. Contrary to the notion that after age sixty-five, one is not particularly active, people who are blind or vision impaired who are over the age of sixty-five undertake a myriad of activities in their communities. They volunteer, take care of their grandchildren so that families can continue to work,

advocate for the needs of their peers who are blind or vision impaired, and engage in many other pursuits which by nature, incur non-optional costs. Life does not end at age sixty-five. More than ever today, it continues as people maintain their health for much longer, and wish to remain active in their communities and society.

This observation can easily be supported by the fact that the age at which one can receive the aged pension has been increased to sixty-seven for men, and will very likely increase in years to come.

What Should Be done

If the mobility allowance is incorporated into the NDIS, the majority of people who are blind or vision impaired will become ineligible to receive the mobility allowance under current arrangements, as they are over age sixty-five. 75% of people who are blind or vision impaired are over sixty-five, as noted in the submission to this consultation prepared by the Australian Blindness Forum.

If the proposal to incorporate the mobility allowance into the NDIS is adopted, practical steps must be taken to insure that people over the age of sixty-five, with any disability that has thus far, rendered them eligible for the mobility allowance, continue to receive the equivalent support.

To date, there is no evidence that promises to ensure that people over the age of sixty-five receive equivalent support to those eligible for the NDIS will be carried through. No practical measures have been announced that guarantee the equivalent support for people over the age of sixty-five to be provided.

Practical, concrete measures, such as the announcement of the continuation of the mobility allowance for people over the age of sixty-five with a disability, must be made. Disability is not connected with age, and legislation must be amended to reflect this reality.

Recommendation: That the mobility allowance be upheld and continued for people over the age of sixty-five who have a disability, and who are eligible to receive the allowance under current arrangements.

Other Effects Of The Proposed Amendment

Possible Loss Of Choice and Control

The nature of support needs for people who are blind or vision impaired is that these needs are episodic. For example, one might only need orientation and mobility if they move to a new area. Once they are familiar with that area however, the need for continuing orientation and mobility will lessen.

Consequently, even though some people may technically be eligible for the NDIS, they may feel that their needs are met in terms of day-to-day support. The consequence would be that if one chose not to access the NDIS, eligibility for support with transport costs would be forfeited.

If the principle of choice and control is the key to the success of the NDIS, it should be equally appropriate that people have choice and control over which way they receive their financial support, (IE through the NDIS, or through a mobility allowance). Nobody should be forced to access the NDIS to receive the support they require due to disability. Disability support should be able to be accessed in the way that person chooses, whether that be through the NDIS, a simple social security benefit, or block funded arrangements in cases where orientation and mobility or specialist library services for example, are required.

A Possible Disincentive

People who are not eligible for the NDIS, but who currently receive the mobility allowance, may be forced to give up their voluntary work or training, if the associated costs become prohibitive. The withdrawal of the mobility allowance for people in this situation could mean the difference between mere survival, and the ability to contribute or to develop new skills. The constant financial struggle just to stay afloat, without being able to go out, or to participate in community activities, can lead to severe depression and anxiety. The mobility allowance has played a key role in enabling people who have not had the opportunity to be employed to pursue meaningful activities, and to make invaluable contributions to their communities. The removal of the mobility allowance could well prevent people in this situation, (of whom there are many), to cease making such contributions due to the costs involved.

Conclusion

Blind Citizens Australia firmly asserts that the proposal to incorporate the mobility allowance into the NDIS, with no alternative allowance to be made available to those who are not eligible for the scheme, will result in great inequity and disadvantage for people who are ineligible for the NDIS. The majority of people who are blind or vision impaired are over age sixty-five, meaning that in reality, the majority of people who are

blind or vision impaired are ineligible for the NDIS. No measures have been announced to guarantee that an equal level of support for transport and other non-optional costs once covered by the mobility allowance will be provided, despite promises that this would occur. Blind Citizens Australia calls for practical, concrete measures to be announced and delivered that will insure that every person who is currently eligible for mobility allowance under the current arrangements, will be equally supported by an alternative allowance, if the mobility allowance is incorporated into the NDIS.