

27 October 2016

Human Services inquiry
Productivity Commission
Locked Bag 2, Collins Street East
Melbourne VIC 8003

ABF submission to Introducing Competition and Informed User Choice into Human Services: Identifying Sectors for Reform – Productivity Commission Preliminary Findings Report

Thank you for the opportunity to respond to the Preliminary Findings Report. ABF is the peak body representing the blindness and vision impairment sector. As a member-based organisation, we have drawn on input from our membership to formulate a response to the Preliminary Findings Report, with particular emphasis on the implications for Australians who are blind or vision impaired.

As previously stated, ABF supports the general intention underpinning the PC's Inquiry into Human Services to put user choice first in relation to the delivery of human services. However, ABF reiterates its statement from its first submission to this Inquiry, that it is imperative that in order for users or consumers to be able to make an informed choice about the human services they require, they must be able to access all relevant information in the format of their choice.

People who are blind or vision impaired face many barriers in independently accessing information and materials. Therefore, ABF submits that for the 6 human services identified as best suited to competition, contestability and user choice, it is vital that the reforms include improving access to information for people with disability, such as people who are blind or vision impaired, to ensure there is true informed user choice.

ABF notes two of the preliminary findings in the Preliminary Findings Report refer directly to user choice and access to information:

- **Preliminary finding 4.1**

Other countries have shown that user choice can benefit patients when they have access to useful consumer-oriented information on services and referring practitioners support them in making decisions¹

- **Preliminary finding 5.1**

Information asymmetry between palliative care users and providers could be lessened through the provision of high-quality, consumer-oriented information about

¹ Introducing Competition and Informed User Choice into Human Services: Identifying Sectors for Reform – Productivity Commission Preliminary Findings Report (Overview) September 2016, p.19

the availability and quality of services. While some information on patient outcomes is currently available, it is not provider-specific and is not designed to be consumer-oriented²

ABF fully supports these findings relating to consumers accessing high quality, consumer-oriented information in order to address any information asymmetries and promote informed consumer choice. However, for people who are blind or vision impaired, it is essential that these human services provide this information to consumers in a format of their choice that they can read. This includes formats such as audio, large print, Braille and electronic media.

Accessibility

ABF notes accessibility is an aspirational goal of the Federal Government. The Department of Finance recently announced that Standards Australia has agreed to create an Australian Standard on ICT accessibility through the direct text adoption of the European Standard (EN 301 549).

The Department of Finance said that the “standard will support access to ICT for people with disabilities and provide domestic ICT procurers with accessibility guidelines and certainty...Once adopted, the Australian standard can be used when determining technical specifications for the procurement of accessible ICT products and services. This includes generic requirements, ICT with video, ICT with 2-way voice, hardware, web content, software and documentation and support services.”³

ABF urges the Productivity Commission to include this new Australian Standard on ICT accessibility into any reforms of human services.

Further, any procurement contracts must include accessibility not only of information but software and any future physical or hardware systems such as Medicare cards, e-tags etc. It is imperative that Government adopt a procurement policy that any equipment, software systems or facilities purchased, rented or leased for human services are accessible to people who are blind or vision impaired.

Disability awareness training

For all of the six human services identified in the Preliminary Findings report as suitable for reform, the final report by the Productivity Commission needs to recognise the needs of people with disability using these services and the need for all human services staff to understand disability.

It is vital for all staff working in these services to have disability awareness training, particularly in relation to people who are blind or vision impaired, so that they understand the impact of vision loss and communicate with the consumer appropriately.

Wayfinding systems

If private facilities are being used by the human services being considered for reform, ABF recommends all services utilise wayfinding systems within buildings or offices for people who are blind or vision impaired. Wayfinding principles ensure that people who are blind or vision impaired are able to independently and with dignity, safely orientate and navigate through built environments.

² Ibid, p.21

³ <https://www.finance.gov.au/blog/2016/09/09/Accessibility-ICT-Procurement-Standard/>

This includes lighting, signage, luminance contrast signage and tactile ground surface indicators that allow for a continuous, accessible, detectable and logical path of travel in and through a building.

Thank you for the opportunity to respond to the Preliminary Findings Report. Please call Ms Jennifer Grimwade should you require any further information.

Yours sincerely

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