

## **Vision Australia's submission to the Productivity Commission on reform to Human Services based on competition, contestability and user choice**

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### **Introduction**

Vision Australia is pleased to have the opportunity to provide further input to the Productivity Commission's Inquiry into human services reform based on greater competition, contestability and informed user choice. We have provided our views in October 2016, and this submission complements our initial response.

We agree in principle that human services reform based on the above criteria could lead to improvements in the quality, equity, efficiency, responsiveness and accountability of service provision.

Careful consideration should be given to designing any system-wide changes, to safeguard the rights of all participants, and to learn from failings and issues that have been present in other schemes and services based on principles of greater user choice, such as the National Disability Insurance Scheme (NDIS).

In this submission we will address the key issues that could impact people who are blind or have low vision when accessing human services based on a user choice model; we will specifically address the need for the provision of information in accessible formats.

People who are blind or have low vision are reliant on the six priority areas for reform identified in the first stage of the Productivity Commission's Inquiry:

- social housing
- public hospitals
- end of life care services
- public dental services
- government commissioned family and community services
- services in remote Indigenous communities

Many people who are blind or have low vision have low incomes and experience higher rates of unemployment and therefore have a greater reliance on the benefits system, leading to a greater representation as recipients of human services. Aboriginal and Torres Strait Islander people have a higher incidence of vision impairment: this, combined with the comorbidity of other health or societal conditions, leads to a greater need for human services.

The Preliminary Findings of the Productivity Commission report note that there is an, “*expectation that services meet a minimum standard*”. The meeting of minimum standards in service delivery must be an obligation on all providers, not an ‘expectation’.

Further, all information provided by human services providers must be available in accessible format, meaning, a format that the client is able to access easily in order to understand the information provided (such as large print, audio, or Braille).

Finally, all staff who provide human services to people who are blind or have low vision must be able to demonstrate competency in relation to the particular needs of people who are blind or have low vision. In addition to the increased reliance on these services by people who are blind or have low vision noted above there are potential barriers around inaccessible information, inaccessible complaints or reporting mechanisms and a lack of understanding of blindness by service providers all of which may lead to sub-standard outcomes.

## **ISSUES PAPER REQUEST FOR INFORMATION 2**

- *Lessons from previous reforms, in Australia or overseas, to introduce greater user choice in human services (specific examples outlining how user choice was introduced, the costs and benefits of the reform, and the ways in which the reform could be applied would be welcome)*
- *The supports needed for users to exercise informed choice (examples could include the provision of user oriented information, access to third party expertise or a system navigator)*
- *How to support users with complex needs, or a reduced capacity to make informed choice*

### **Lessons from previous reforms that introduced greater user choice in human services – The National Disability Insurance Scheme (NDIS) and inaccessible information**

One of the major issues to come out of NDIS trials for Vision Australia clients was that NDIS related documents are not yet provided in accessible formats. For example people who read Braille are not supplied NDIS information, application forms, complaints forms or their final plan in Braille. Information is also not yet readily available for people who have low vision in large print or audio.

#### Vision Australia Recommendation 1

When developing human services reform based on a principle of informed user choice, all information concerning those human services must be provided in accessible formats to ensure that the substantial negative issues that occurred with NDIS trials are not repeated.

#### **Accessible information - how to support users with complex needs**

The inability to easily access relevant information can be a significant barrier to accessing health and social services. In turn this can increase feelings of isolation, confusion and apathy. If a person is already unwell and it is unusually difficult for them to access information with regards to human services there is the potential for individuals to not be able to meet their obligations and/or become disillusioned and give up trying to engage human services.

The public reporting of human services performance, in order to increase competition and informed user choice, will be of no use to people who are blind or have low vision if they cannot access that information in their format of choice (such as braille, large print, audio recording, or accessible soft copy).

### **Technology use by people who are blind**

Any reform of human services must be designed with the needs of the user or recipient in mind. Many people who are blind or have low vision use a screen reading function on a smartphone or computer to listen to the information on the screen.

The provision of information on these platforms, whilst they are an important information tool for some, cannot be considered a universal information vehicle for all consumers. Research conducted by Vision Australia found that up to two-thirds of our clients do not have access to the internet. Our research found;

- Only 16.7% of our 26,000 clients use a Smartphone
- Only 6% of our clients aged 65 and older use a Smartphone
- 52% of our clients aged 19 – 65 use a Smartphone.

Of Vision Australia's over 26,000 clients, 70% are aged over 65, meaning the vast majority of our clients do not have access to Smartphone technology.

### Vision Australia Recommendation 2

Accessibility standards must be applied to all Apps, websites, and files (including text and PDF) related to human services so that screen software is compatible.

### Vision Australia Recommendation 3

Any reform of Human Services which channels or refers clients in the first instance to websites, or Apps and the like, must take into account the low usage and take up of this kind of technology amongst those aged over 65 years. Information must be made available in all formats to ensure it is accessible to everyone.

### **Access to third party advocates - *supports needed for users to exercise informed choice***

The ability of consumers to make informed choices is affected by their health literacy, their age, and intellectual capacity. There is need for the provision of third party advocates to ensure that informed user choice does not put these people at a disadvantage. People with intellectual disabilities may not be able to comprehend complex information and understand their options and people who are elderly may be suffering cognitive decline and require assistance to utilise the user choice model. As noted above, the majority of people who are blind or have low vision, Vision Australia's clients, are aged over 65.

While we promote independence and recommend that outside assistance is a last resort for people who are blind or have low vision, when combining blindness and low vision with the potential for higher rates of age related cognitive decline, it's essential that independent advocates are available for those who may struggle to make human services choices alone.

### Vision Australia Recommendation 4

Third party assistance must be provided in addition to all information being provided in formats that are accessible to the blindness community.

## **ISSUES PAPER REQUESTS FOR INFORMATION 3 and 29**

Below we address changes to government stewardship arrangements and the potential for competition and contestability to create service innovation.

### **The stewardship role of government in a user choice model**

As has been seen in the development of the just released and delayed NDIS Quality and Safeguarding Framework, the long delay in sharing, and introducing protections for service users created uncertainty and confusion in the sector.

#### Vision Australia Recommendation 5

Transparent processes must be in place for the development of quality and safeguarding frameworks.

#### Vision Australia Recommendation 6

The stewardship role of Government must be prioritised over contestability in any future reforms. We recommend that a Quality and Safeguarding Framework must be developed and established before major changes to service delivery or provision are implemented. Anything less leaves people who are blind or have low vision exposed to risk.

#### Vision Australia Recommendation 7

There must be a fully independent commissioner who can oversee complaints and service delivery issues, with enforceable regulatory powers, this may be one per priority area, or an overarching consumer protection body, but current arrangements for safeguarding will not be sufficient in a market or consumer directed funding model.

### **Competition, contestability and increased innovation**

Greater competition and contestability could promote innovations in the provision of human services as providers strive to meet the needs and preferences of service users. Providers will not survive or thrive in a user choice model if they do not achieve successful outcomes for their users. In order to stand out in a busy market, and maintain clients, providers may be more inclined to innovate and refresh their offerings and processes.

This motivation by providers to improve and maintain high standards is good for users as there is likely to be an overall increase in the quality of service provision and more of a focus on the users.

#### Vision Australia Recommendation 8

The Productivity Commission will need to address the issues arising in thin markets, particularly in remote and regional areas. This is especially the case for specialist service provision, and in meeting the needs of people who are blind or have low vision, who already face barriers to accessing mainstream services.

## **About Vision Australia**

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150<sup>th</sup> year of operation in 2017.

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.

Vision Australia service delivery areas include:

- Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
- Aids and Equipment, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs
- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Employment services, including national Disability Employment Services provider
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government
- Advocacy and Engagement, 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 clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct 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 on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, 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 vision impairment.

Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia (BCA), to strengthen the voice of the blind community. We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.