

Level 3

Ross House

247-251 Flinders Lane

Melbourne Victoria 3000

Telephone: 03 9654 1400

Toll Free: 1800 033 660

Fax: 03 9650 3200

Email: bca@bca.org.au

Website: www.bca.org.au

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Blind Citizens Australia

# Blindness Service Provider Expectations Policy

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## About Blind Citizens Australia

Blind Citizens Australia is the peak national representative organisation of and for Australians 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.

We provide peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers limiting the full and equal participation of people who are blind or vision impaired. Through our policy work, we provide advice to community and government on issues of importance to people who are blind or vision impaired.

As a consumer-based organisation, our work is directly informed by lived experience of blindness and vision impairment. Our members, our directors and the majority of our staff are blind or vision impaired.

## About Australians who are blind or vision impaired

There are currently more than 450,000 people who are blind or vision impaired in Australia. According to Vision 2020 Australia, around 80% of vision loss in Australia is caused by conditions that become more common as people age. This raises a number of implications for Australia’s aging population, with one in every four Australians projected to be 65 years of age or older by the year 2056.

Eye conditions that cause vision impairment for Australians include: age-related macular degeneration, cataract, diabetic retinopathy, glaucoma and uncorrected refractive error.

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. The extent to which people are able to actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive to the needs of all citizens – including those who are blind or vision impaired.

# 1. Purpose of this policy

Providers of specialised services for people who are blind or vision impaired play an integral role in the skill development, independence, community participation and safety of blind and vision impaired Australians.

BCA’s mission statement calls for “high quality and accessible services which meet our needs”. With new legislative and funding frameworks for service provision, Australians have more choice and control over the disability-related services we access than ever before.

BCA believes it is important to have a yardstick which people who are blind or vision impaired can use to measure the quality of services we receive. This policy provides clarity on the views of service users. Blindness service providers can use this policy to measure the quality of the services they offer.

This policy can be used by individuals receiving or seeking blindness-specific services, wherever they live and in all contexts, and irrespective of which service provider is involved. Implementation of this policy will enable service users to receive a consistent approach to service delivery and to be at the forefront of service provision and organisational decision-making.

This policy represents BCA’s aspirations. Some service providers may already satisfy many of the expectations of the clauses of this policy; striving to achieve all would represent best practice in service provision. A blindness service provider that strives to meet our aspirations will offer an excellent choice for a service user. It is hoped that service providers who have not traditionally offered service to people who are blind or vision impaired may see benefits in adopting elements of this policy.

# 2. Policy context

Underpinning every aspect of this policy are the human rights, dignity and privacy of and respect for each individual who is blind or vision impaired. BCA works hard to maintain constructive working relationships with blindness service providers and has recently formalised partnership agreements with several of them. This policy has been developed after consultation with a broad range of service users who utilise many different services. It recognises the diversity in history and focus of blindness service providers. In this framework of mutual understanding and respect, we encourage and offer support to blindness service providers to develop strategies to ensure that they continue to offer quality services well into the future.

# Policy Statement

## 3. Entitlement to Service

3.1 People who are blind or vision impaired have specific needs for assistance, training and services if we are to fully participate as citizens in our communities. While people who are blind or vision impaired can and increasingly do access mainstream and multi-disability services, BCA believes that specialist blindness service providers have the best knowledge, experience and training to most appropriately meet the needs of people who are blind or vision impaired and assist us to achieve our aspirations.

3.2 Service Guarantee: Blindness service providers must guarantee to provide the services that are essential to the education, employment and daily lives of people who are blind or vision impaired, irrespective of their eligibility for funding. No blind or vision impaired person will be out of pocket or denied a service they need because of their blindness or vision impairment.

3.3 Blindness-specific services include:

- Information about and training in the use of assistive technology;

- Orientation and mobility, including dog guide training, cane training and instruction in other relevant products and equipment;

- Braille instruction and transcription services;

- Library services;

- Occupational therapy as it relates to daily living skills;

- Rehabilitation counselling.

3.4 Blindness service providers may offer additional services that can also be of benefit or interest to blind and vision impaired people, such as genre cooking classes and social activities. These may be funded from targeted sources or by the users, at the blindness service provider’s discretion.

3.5 Blindness service providers exist to meet the needs of people who are blind or vision impaired that relate to their blindness and to help them achieve their aspirations, whatever their circumstances. Blindness service providers collect money from the public and accept government grants on this basis. Some people who are blind or vision impaired now have access to a range of funding programs. Not all people who are blind or vision impaired are eligible for a form of government payment and there are often significant delays in obtaining or maintaining access to these programs. Many funding packages do not adequately address the disability specific needs of service users.

3.6 Service users who access funding packages are encouraged to seek funding for essential blindness services. This will help to ensure that blindness service providers can continue to operate and provide government with accurate and measurable indicators of the needs of the blind and vision impaired population. When funding is allocated for blindness-specific services, it will be used to pay for services received at the appropriate rates.

3.7 No service is to be predicated on a service user's willingness or ability to donate or to become involved in the service provider's fundraising, marketing or publicity.

## 4. Service Delivery

4.1 Service users can choose where, when and what services they receive and are to be informed of the implications for any funding on the decision whether to travel to a service or receive it at home or elsewhere.

4.2 Timeline: It is reasonable to expect that a person inquiring about or enrolling for a service be given a realistic estimate of the time they will need to wait for any assessment, report or commencement of service. Service users should know when they can expect their service to start and its duration and be informed of any significant alterations to this timeframe.

4.3 Service agreements: Service agreements must clearly state what will be provided and reflect what has been requested. It is recommended that sample service agreements be published in a range of accessible formats, including indications of the elements that can be varied. Service agreements need to be flexible to meet individual needs and circumstances. Service agreements are to be designed to take into account a service user's health and any other disabilities, cultural background, lived experience, living arrangements and roles within the community. Where individual characteristics cannot be accommodated, this needs to be clearly explained to the service user. An individualised service agreement must be provided to the service user, in their preferred format, before or at the time of signing. Service agreements should clearly state what costs, if any, will be incurred and how and when they are to be paid. Minimum notice periods for cancellation of appointments, cancellation fees and exit fees should be detailed.

4.4 Pricing: The costs of services and products and any cancellation or exit fees should be publicised. It is desirable that pricing policy be transparent. Service users need to be able to compare and seek explanations for differences in pricing between particular service providers or locations.

4.5 Service Quality: BCA expects that all services will be delivered to a high standard of safety and quality by suitably qualified, experienced and resourced staff.

4.6 Invoicing: Invoices are to be provided to the service user or their billing contact in a timely manner, no more than one month after the service has been delivered. Service users are to receive invoices in their preferred format. Invoices must be itemised, so that it is evident what has been charged, including any administration fees.

4.7 Interactions with service users: It is best practice that any employee of a service provider who interacts with a service user introduce themselves and explain their role. When working with a service user, they should clearly explain what they are doing and why. If they record a session or take photos, they are obliged to state that they are doing this, and for what purpose; the service user has the right to ask them to desist.

## 5. Product sales:

5.1 Where a blindness Service provider sells products, they must clarify the extent to which Australian Consumer Law applies.

5.2 Information about the blindness service provider’s policies on warranties, returns and refunds is to be published widely in a range of formats and to be made available at the point of sale in the service user’s preferred format.

5.3 Appropriate after-sales service and training where appropriate must be provided to a service user who purchases a product.

5.4 Where a blindness service provider sells products, they must declare any actual or reasonably perceivable conflict of interest that may affect the design, cost and extent of the services they offer.

## 6. Communications and access to information

6.1 Service users have a right to access all communications produced by a blindness service provider, including: social media, websites, newsletters, forms, service information, complaints procedures, governance and nomination processes, in accessible formats. Any image used in these materials must be described. Digital resources should be easy to navigate independently and accessible via a range of devices, web browsers and adaptive software. Blindness service providers are encouraged to regularly publicise these methods of communication.

6.2 Documents relating to a service user must be provided to the individual in their preferred format.

6.3 It is a requirement that all video material produced by service providers be audio described and that transcripts be available.

## 7. Complaints procedures

7.1 Blindness service providers must inform all service users about and publicise their complaint procedures in accessible formats. This should include information about alternatives if a service user is not satisfied with internal complaints mechanisms

7.2 Information about complaints procedures should include acknowledgement of a complainant’s right to a support person or advocate and/or an interpreter at all stages of the complaints procedure. Information about BCA and how it can help is to be regularly promoted.

7.3 When a service user makes a complaint, its receipt is to be immediately acknowledged, the officer handling the complaint named, and be given a timeframe when to expect an outcome.

7.4 BCA recognises that people who are blind or vision impaired are often compelled to continue receiving services from service providers with whom they are dissatisfied, due to the absence in many locations of any alternative.  Service users need to be free to comment publicly (positively or critically) on the services they receive. It is expected that such comments, if expressed appropriately, will not impact the service user’s employment or ability to access future services from the service provider.

## 8. Fundraising, Marketing and Publicity

8.1 Fundraising is integral to the operation of any blindness service provider, whether by seeking individual donations or by approaching corporate and philanthropic donors. Fundraising plays a dual role of raising money and educating the public. All fundraising, marketing and publicity material must promote people who are blind or vision impaired as valuable contributors to society. Materials can demonstrate how investment in a service will empower people who are blind or vision impaired to exercise our human rights, by emphasising our dignity, reablement, independence and diversity. Publicity can reflect that not all people who are blind or vision impaired seek to adjust or improve, but sometimes need services simply to live our lives. It is essential that all staff, consultants and volunteers involved in such activities be trained to recognise how they impact public attitudes to blindness.

8.2 Fundraising, marketing and publicity materials should aim to reflect the demographics of the users of the service in all respects, including age, gender, sexuality, cultural background, religion, family composition and geography. It is desirable to avoid implying that one element of a service, such as dogs or children, is representative of the service as a whole.

8.3 Blindness service providers are encouraged to adhere to the Fundraising Institute of Australia's Code (1 June 2018), in particular to Section 5.1. :

"5.1 Conduct towards Beneficiaries:

Members will not engage in conduct that threatens the dignity of, or disparages a Beneficiary. Such conduct may include, but is not limited to:

a) commenting unnecessarily or negatively on the impairment, dependency or disability of a Beneficiary;

b) using language which suggests that the client is to be pitied or feared;

c) using children on Promotional Materials to raise funds for adult causes, giving the impression that the Beneficiaries are childlike;

d) stating or implying a falsehood regarding a Beneficiary; or

e) using a Beneficiary’s image or name or other personal information without their permission."

8.4 Blindness service providers can use their relationships with corporate donors to encourage them to work towards ensuring that their products and services are accessible to service users.

8.5 Information which could be used to identify service users, such as names, photographic images and stories, can only be used by a blindness service provider with that service user's genuine, informed and freely given consent. Service users must be informed about the existence of any identifying material relating to them, their right to say no and that they can continue to receive services if they do.

## 9. Employing people who are blind or vision impaired

9.1 Where a person who is blind or vision impaired is qualified for a position and meets the selection criteria, preference is to be given to employing that person. Lived experience is to be considered as an asset to a blindness service provider, influencing its culture and quality of service. It is vital that senior management positions are held by people who are blind or vision impaired.

9.2 The lack of a driver’s licence must not prevent a person obtaining a position, where that person is otherwise qualified.

9.3 It is best practice for organisations to adopt and advertise targets and timelines for percentages of blind staff in service delivery and management positions. Annual reports provide an opportunity to detail the number and percentage of staff who identify as blind or vision impaired and the roles they occupy.

9.4 All premises, digital resources (whether designed or acquired) databases and social activities intended for staff are required to be accessible to people who are blind or vision impaired, whether currently employed or not, so that there is no barrier to their future employment. This access is intended to enable such staff to achieve the same independence, integrity and dignity as other staff members. Any additional training, equipment or time necessary to achieve their full participation as staff members is to be provided.

9.5 Staff who are blind or vision impaired are to be encouraged to pursue opportunities for career development and promotion within the organisation.

9.6 All staff members are regularly to be educated about the lives of a diverse range of people who are blind and vision impaired, so that they can understand living with differing degrees of blindness. This aspect of training or induction must be facilitated or lead by a person who is blind or vision impaired (in a paid capacity).

## 10. Governance and leadership

10.1 Blindness service providers are required to comply with all applicable laws in relation to governance. Those regulated by the Corporations Law must be governed by boards of directors, who must act in the best interests of their company. BCA asserts that, among the range of expertise required for an effective board, such as knowledge of business or policy and gender balance, lived experience of blindness and vision impairment is essential.

10.2 A majority of directors or members of a management committee ought to have lived experience of blindness or vision impairment. All such office holders are to have appropriate skills and experience. At least one director or member should be totally blind. Royal National Institute of the Blind, whose bylaws require that 75% of directors be blind or vision impaired, represents best practice.

10.3 People who are blind or vision impaired must be encouraged, trained and supported to nominate for the board and other committees of blindness service providers.

10.4 It is imperative that directors and committee members who are blind or vision impaired be resourced and supported to communicate with service users and to seek input about experiences of blindness that are different from their own.

10.5 Board and committee materials are to be provided to directors and members in their preferred formats and all meeting venues and board activities are required to be accessible to people who are blind or vision impaired.

10.6 Board and committee members who do not have lived experience of blindness are to be provided with an induction which informs them about the lives of a diverse range of people who are blind or vision impaired. This aspect of training or induction must be facilitated or lead by a person who is blind or vision impaired (in a paid capacity).

10.7 Service users must be able and encouraged to become members of blindness service providers so that they can elect governing bodies. Election material needs to be available in a range of formats, and to be publicised widely.

## 11. Service user representation and advisory bodies

11.1 Blindness service providers must have, maintain and publicise effective systems that enable service users to influence their operations and the way services are delivered. The existence of these systems is to be promoted to staff and service users.

11.2 It is essential that blindness service providers ensure that they receive input from a range of service users to represent the diversity of people who are blind or vision impaired, including: women, people of various sexual and gender identities, people with additional disabilities, Aboriginal and Torres Strait Islander people, people from diverse cultural backgrounds and faiths, and people at different stages of life.

11.3 Advisory bodies need not be elected, but where service users are appointed to them via other mechanisms, selection criteria must be transparent and available and a range of service users should be encouraged to nominate. It is desirable that people appointed serve fixed and limited terms and that they be replaced by new appointees with different perspectives. It should be clear whether service users are appointed in their own right or as representatives. Where they are representatives, they are to be resourced to communicate with their constituencies.

11.4 Where advice is given by an advisory body, there needs to be a clear pathway for responses to that advice. Leadership teams and governing bodies are to be accountable for responding to the advice in a timely and efficient manner.

11.5 Advisory bodies should meet regularly and need to be able to consider matters referred to them by governing bodies or by service users.

# 12. How this policy should be used

* This policy is available on BCA’s website, and in your preferred format on request.
* This policy can be used by individuals receiving or seeking blindness-specific services, wherever they live and in all contexts, and irrespective of which service provider is involved.
* Implementation of this policy will enable service users to receive a consistent approach to service delivery and to be at the forefront of service provision and organisational decision-making.
* Blindness service providers will be invited to assess their services in relation to this policy and to report on their progress in meeting its expectations.

# 13. Glossary of key terms

In this document, these words have these meanings:

Blind person: includes any person who is legally blind or has a vision impairment or who seeks a service from a blindness service provider because their disability is or includes loss of vision.

Blindness: includes vision impairment or low vision.

Blindness service provider: means any organisation whose main focus is providing services to blind people or which portrays itself to the public as being in existence to assist people who are blind or vision impaired.

Service user: means any person who wishes to become, is or has been a user of a blindness service.