# Blind Citizens Australia logo

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# Response to the Foundational Supports (General Supports) Consultation Paper

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## 1. Introduction

### 1.1 About Blind Citizens Australia

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities.

BCA provides peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers by promoting the full and equal participation in society of people who are blind or vision impaired. Through our policy work, we provide advice to community and governments on issues of importance to people who are blind or vision impaired. As a disability-led organisation, our work is directly informed by lived experience. All directors are full members of BCA and the majority of our volunteers and staff are blind or vision impaired. They are of diverse backgrounds and identities.

### 1.2 About people who are blind or vision impaired

According to the Australian Bureau of Statistics (ABS), over 4.4 million Australians have some form of disability - roughly equating to 1 in every 5 Australians having a disability, and there are currently more than 500,000 people who are blind or vision impaired in Australia; with estimates that this will rise to 564,000 by 2030. According to Vision Initiative, around 80% of vision loss in Australia is caused by conditions that become more common as people age[[1]](#endnote-1).

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 can 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 of the needs of all citizens – including those who are blind or vision impaired.

## 2. Submission context

This submission is based on existing legislation and frameworks, noting gaps in the fulfilment of requirements laid out in existing documentation. The pertinent acts and legislation are:

* United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
* The Disability Discrimination Act 1992 (Cwlth)
* Australia’s Disability Strategy 2021-2031 (this strategy coordinates the implementation of the UNCRPD)
* International Covenant on Civil and Political Rights (ICCPR)
* National Disability Advocacy Framework 2023 – 2025
* National Disability Insurance Scheme Act 2013 (NDIS Act), including changes under the NDIS Amendment (Getting the NDIS Back on Track No.1) Act 2024

Our response is based on extensive consultations with BCA members and other people who are blind or vision impaired over many years, and our systemic advocacy work related to access to the NDIS.

Blind Citizens Australia also wishes to note our endorsement the submissions made to this inquiry by Vision2020 Australia and the Disability Advocacy Network Australia (DANA).

## 3. Blind Citizens Australia’s submission

### 3.1 Understanding General Supports and the importance of Advocacy

While BCA welcomes the commitments by all levels of governments to undertake “significant reforms to build an inclusive Australian society where people with disability can fulfil their potential as equal members of the community”[[2]](#endnote-2), we must express our concern at the subtle shift of language that has occurred by government in describing these reforms. It is not simply enough for governments to be ‘informed by’ the needs and lived experience of people with disability, with opportunities to ‘contribute ideas’ to the design and implementation of these reforms[[3]](#endnote-3). These enormous changes to the sector, beyond simply the scope of the NDIS itself, will have significant and long term impacts on people with disability across Australia, and so should be genuinely co-designed, as recommended in Action 1.2 of the Final Report of the Independent Review of the NDIS[[4]](#endnote-4).

The consultation paper itself is a complicated and times contradictory document. General Supports are defined as being open for all people with a disability (regardless of NDIS status) and intended to support people with disability to “fully participate in the community, and to make decisions and advocate on issues that impact them”, and “improved awareness of rights, and the ability to advocate to ensure their rights and needs are met” is listed as an intended outcome of these supports[[5]](#endnote-5). Yet this consultation paper makes an attempt to define as off-limits any discussion about advocacy (other than ‘self-advocacy’), with the dubious claim that advocacy is already being dealt with through the National Disability Advocacy Framework 2023 – 2025, despite the recommendation by the Independent Review of the NDIS to include individual advocacy as a foundational support.

It is important to note that recent funding decisions under Information, Linkages and Capacity Building (ILC) programs have led to a significant decrease in the provision of advocacy services, especially in the vision sector. The Disability Gateway, which auspices Australia’s ‘National Disability Advocacy Helpline’, is now the only place where people who are blind or vision impaired can get advocacy support on NDIS matters; however, support is only available for internal NDIA reviews. The Gateway cannot provide any assistance to a participant who wishes to exercise their right to refer a decision by the NDIA to the Administrative Review Tribunal (ART).

We note the consultation paper concedes the need for access to ‘peer support groups, support around self-advocacy [and] rights awareness’, and highlight the inherent contradiction in trying to draw a line of separation between this type of support and other advocacy work. Further, we are concerned that this consultation paper defines self-advocacy as “when a person with disability is empowered to speak up and represents themselves and their interests in matters that affect them”. While this is true on the surface, it does not tell the full story. By contrast, many in the disability sector define self-advocacy as the ongoing work of people with disability who join together – including by forming organisations run by and for people with disability known as Disability Representative Organisations (DROs) – in order to have their voices heard, to support each other, and to ensure they have the same rights, choices and opportunities as anyone else in the community[[6]](#endnote-6). Under this definition, the 'self' in self-advocacy denotes people standing up for and representing their own needs and interests, and should not require them to be do this work individually, on their own. This type of self-advocacy support, delivered by DROs, also extends to the work of systemic advocacy and policy research. Indeed, this submission itself should be considered as a form of self-advocacy – the recommendations we make in this document have been drawn from the experiences of the blind and vision impaired community, and will help inform the individual advocacy many BCA members will undertake: whether through the media or through political engagement.

Across Australia, many people with disability – regardless of their NDIS status – require support to navigate and understand the complex maze of intertwined federal and state/territory government systems, and should be available to anyone who identifies as a person with disability. This is line with the stated aims of the General Supports outlined by the consultation paper.

Finally, we believe that the arbitrary cut-off number of 65 years old for access to the NDIS has been a mistake, and should not be repeated in the development of General Foundational Supports. These supports should be available for any person with a disability, regardless of age in order to help create an equitable and joined up system.

### 3.2 Assistive Technology

People who are blind or vision impaired have long had concerns about the provision of Assistive Technology (AT) inside and out of the NDIS. We note that there is no consistency across the various state-based AT programs; that procuring AT through the NDIS can be a long and frustrating process, with the number of assessments and reports that are required as evidence sometimes costing more than the actual technology being claimed; and that the budgets provided for the maintenance and repair of AT is very small and often leaves people out of pocket.

We note that Action 1.10 of the Final Report of the Independent NDIS Review recommended that “the Department of Social Services, with states and territories, should develop a nationally consistent approach for the delivery of aids and equipment outside the NDIS”.

BCA continues to stand with others across the blindness sector through the ‘Assistive Technology For All’ campaign, to call for a National Assistive Technology Scheme to replace the more than 100 state-based programs currently in operation. Further, as older adults often acquire a disability after the age of 65, and are therefore usually excluded from the NDIS, in order to ensure this is a truly equitable system, it is vital that this is open to all Australians regardless of age.

### 3.3 Subsidised Taxi and Rideshare Services

The inability to hold a driver’s licence can be extremely limiting and isolating for some people who are blind or vision impaired. Ensuring accessibility of all forms of transport and supporting infrastructure can serve to eliminate these barriers, enabling people who are blind or vision impaired to enjoy increased mobility and participation; including increased opportunities for education and employment.

However, as it is not possible to access all areas of public life via public transportation (bus, train, tram and ferry services) alone, taxi and rideshare services (also known as Point to Point or PtP Services) have an important role to play in facilitating the independence of people who are blind or vision impaired. Indeed, in recognition of the fact that people who are blind or vision impaired typically experience much higher transport related costs, all states and territories have put in place various subsidy schemes for the use of these services.

Yet while all jurisdictions across Australia currently recognise the importance of subsidised PtP travel for people who are blind or vision impaired, there remain inconsistencies and variations in how these subsidies have been implemented by various state and territory governments. Some states include journeys made using Uber and other rideshare providers in the subsidy programs, while others limit its use purely to registered taxis. The various schemes also have differences in the ‘cap’ (how much money) and ‘mileage’ (the distance travelled) that is allowable under the subsidy. Most frustrating for people who are blind or vision impaired, especially for those who travel frequently for work, or who live in ‘Border Towns’ (e.g. Albury/Wodonga, Tweed Heads/ Coolangatta, etc) is the difficulty in getting a subsidy pass in one jurisdiction recognised in another.

BCA encourages the Federal Government to work with State and Territory Governments recognise subsidies for PtP transport as an essential Foundational Support for people who are blind or vision impaired, and to establish a nationally consistent framework, which allows for reciprocal recognition across state borders. The nationally consistent subsidy scheme should be expanded (where it hasn’t already) to include rideshare services, and should be available for all people who are blind or vision impaired, regardless of whether they access the NDIS.

### 3.4 National Vision Foundational Support Program

In addition, BCA would like to note our support for the proposal, by Vision2020 Australia in their submission to this consultation paper, to establish a “national, grant funded early intervention program for people with moderate to severe vision loss outside the NDIS”[[7]](#endnote-7). This program would focus on children and young people of up to 25 years of age. As noted in Vision2020’s submission:

“Extending the upper age bracket from 18 to 25 is very important, as it would encompass people with conditions whose onset commences during the latter stages of adolescence. The typical presentation of retinitis pigmentosa, for example, involves complaints of visual disturbances beginning at approximately 20 years”[[8]](#endnote-8).

We echo Vision2020 in encouraging the government to include this type of support in the suite of Foundational Supports, as it is likely that many people with moderate vision loss may not require NDIS – having had their support needs met through this program – while others will begin their NDIS journey equipped with additional evidence of the functional impact of their condition.

## 4. Recommendations

As noted earlier, BCA supports and endorses the recommendations made by Vision2020 and DANA.

In addition, in order to ensure people who are blind or vision impaired can fulfil their potential as equal members of the community, in an open and accessible Australian Society, BCA makes the following recommendations:

1. Acknowledge advocacy as an essential element of Foundational Support, and commit to additional and secure long-term funding for disability representative organisations to recognise the importance of people with lived experience and their role in providing advocacy support.
2. Ensure all Australians have access to the Assistive Technology (AT) they need, including through the establishment of a National Assistive Technology Scheme, which could operate under the Foundational Supports umbrella
3. Recognise that Point to Point (PtP) subsidy schemes are an essential foundational support for people who are blind or vision impaired. All governments should work to establish a nationally consistent framework for PtP Subsidy.
4. Establish a national, grand-funded early intervention program for children and young people under 25 with moderate to severe vision impairment outside the NDIS.

1. Vision2020. *Eye health in Australia*. <http://www.visioninitiative.org.au/common-eye-conditions/eye-health-in-australia> [↑](#endnote-ref-1)
2. Department of Social Services (DSS). *General Supports Consultation Paper*. <https://engage.dss.gov.au/wp-content/uploads/2024/09/general-supports-consultation-paper-1.pdf> [↑](#endnote-ref-2)
3. Ibid. [↑](#endnote-ref-3)
4. NDIS Review. *Final Report: Working together to deliver the NDIS.* <https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf> [↑](#endnote-ref-4)
5. Department of Social Services (DSS). *General Supports Consultation Paper*. <https://engage.dss.gov.au/wp-content/uploads/2024/09/general-supports-consultation-paper-1.pdf> [↑](#endnote-ref-5)
6. The Victorian Self Advocacy Resource Unit (SARU). *Submission to the Draft National Disability Advocacy Framework*. <https://engage.dss.gov.au/wp-content/uploads/2023/05/SARU-Submission-National-Disability-Advocacy-Framework-2022.pdf> [↑](#endnote-ref-6)
7. Vision2020 Australia. *Submission to the Foundational Supports Consultation*. Unpublished at time of submission [↑](#endnote-ref-7)
8. Ibid. [↑](#endnote-ref-8)