# Vision Australia’s Submission

**Victoria’s State Disability Plan 2017-2020**

**6th July 2016**

**Submission to:**

Department of Health and Human Services

Office of Disability

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## Introduction

Vision Australia would like to thank the Victorian Government for the opportunity to provide a submission on the State Disability Plan 2017-2020.

This document does not include every specific concern for the blindness and low vision community, but rather seeks to identify the key issues and provide evidence and examples of their impact. We support the aspirations of the discussion paper, and that social and economic progress and inclusion should be the principles that guide the Disability Plan in 2017-2020.

We have provided recommendations for each issue raised under the four themes. These include: community engagement and social inclusion; independent voting; access to housing and the right to independent living; access to transport; freedom from violence and abuse; access to education; and access to the economy.

Many of the barriers people who are blind or have low vision face are multi-dimensional, crossing over State boundaries and Departmental responsibility, and could be considered under more than one of the discussion paper’s themes. Longitudinal change is hard to bring about, and we recommend that goals should be included that go beyond the lifespan of this Disability Plan.

Vision Australia is pleased to see the focus on including outcomes and clear measurements in the Disability Plan. This should include the disaggregation of data by disability type, transparent reporting across the life of the Disability Plan, and strong mechanisms to include the views and experiences of people with a disability. This should be extended to require individual Departments comply with similar reporting requirements against their Disability Plans.

Several of the issues raised here intersect with recently completed or ongoing State or National Inquiries or Reviews. Vision Australia would urge the consideration of their findings in formulating the State Disability Plan 2017-2020.

## Theme 1: Active Citizenship

### Community engagement and social inclusion

**Recommendation:** That the State Disability Plan should identify ways to incorporate measurements of social capital, and encourage the development of community engagement plans for people with disability throughout Government policies and programs.

**Recommendation:** That the State Disability Plan should support the need for mandated audio description on free-to-air television. The Victorian Government should require audio description to be included as an additional track in Government produced or commissioned video work such as Emergency Management and community service announcements.

**Recommendation:** That the State Disability Plan recognises the need to support the participation in sport through disability specific groups, and mainstream sporting codes.

**Social capital**

People who are blind or have low vision often find it difficult to engage with their local community. For instance, in Brisbane, 60.6% of people with a disability had spoken to none of their neighbours, whereas people without a disability had spoken to at least one.[[1]](#footnote-1) The conjunction of barriers (i.e. combination of navigating the built environment, access to transport, and lack of accessible services) often leads to social isolation for people who are blind or have low vision.

Social capital, the set of relationships and social structures that support connections between individuals and organisations, is an important conceptual framework that helps to understand the benefits of community engagement for people who are blind or have low vision. This can occur through neighbourhood groups and community organisations, social clubs and civic activities such as council programs. Building social capital through community engagement helps in:

* Overcoming isolation
* Building relationships and reciprocity
* Eroding attitudinal barriers
* Strengthens the social fabric of the broader community

It also ‘under-girds and supports self-determination’ for people who have a disability.[[2]](#footnote-2) An increased network of relationships and connections has positive implications for all aspects of a person’s life, from participation in sport, through to enhanced health outcomes and greater opportunities for employment. However, building social capital often relies upon people having the economic ability to participate in networks. Measures of social capital for people with a disability should be used as an indicator for positive outcomes in the State Disability Plan.

**Audio Description**

Audio description is delivered as narration on a separate aural track, to describe visual elements happening in a television program during the natural pauses in the dialogue. Without it, people who are blind or have low vision miss out on important content and social interaction opportunities, as they’re unable to watch and discuss television like the rest of the community. Australia is embarrassingly behind many developed and developing countries in providing this service on free-to-air television.

While this is a Federal issue, the State Disability Plan should identify its centrality for Victorians who are blind or have low vision. This is of particular need in State Emergency Management and community service announcements. Currently these have Auslan Interpreters or closed captioning; in the future they should also have audio description of the visual elements.

**Sport**

Participation in sport is recognised as a central element in building social capital, as it increases outcomes in happiness, health, and community connectedness. Sport can offer benefits for employment: it helps build the soft life skills that are important in the workplace, and it provides valuable networking and experience in socialising.

Beyond physical participation in sport, there are opportunities to contribute through club committees and social events. However, while there are many organisations that support and facilitate sports for people who are blind or have low vision[[3]](#footnote-3), there are still barriers to participation – lack of funding for equipment, limited opportunities in regional or rural Victoria, and gaps for involvement in ‘mainstream’ sporting clubs.

### Leadership

**Recommendation:** That the State Disability Plan should address inequities in leadership opportunities by considering the findings in the Australian Human Rights Commission *Willing to Work* Inquiry.  Affirmative action policies should be introduced, such as targets for people with disability in leadership roles, as well as the development of mentoring programs for career progression.

Vision Australia is an employer of choice for the blindness and low vision community. We are leading advisors and developers of information and communications technology to provide an enabling work environment, we practice affirmative action in the employment of blind and low vision candidates and we conduct regular research to build upon our evidence base. At present, 14.5% of our workforce has a vision impairment, and these staff work at every level of our organisation, in our Leadership Team and on our Board.

To create more jobs for people with disability in leadership roles we need to address poor employer attitudes who do not understand the real benefits of a diverse workforce. To create more leadership opportunities, the Victorian Government must ensure career planning is built into all positions, and that ongoing professional development and leadership programs are available for people who are blind or have low vision. This should be extended into the community and business sectors.

### Access to justice

**Recommendation:** That the State Disability Plan address accessibility issues in the Court system, including the provision of information and the ability of people who are blind or have low vision to serve on juries. **Recommendation:** That the State Disability Plan supports the continued and equitable provision of Legal Aid in recognition of the increased representation of people with a disability in the legal system.

**Serving on Juries**

Vision Australia has made a submission to the Department of Justice and Regulation Inquiry on improving equality by legislative reform to the Juries Act 2000 (Vic). In this, we support the NSW Law Reform Commission’s recommended legislative changes being adapted and applied to the Victorian context.

People who are blind or have low vision should be able to exercise their rights as citizens on an equal footing with the rest of the community. Individuals must not be prevented from appearing on juries solely on the basis of their vision loss, and reasonable adjustments to court proceedings will enable people who are blind, deafblind, or who have low vision to participate in the justice system on an equal basis. It is vital that our community can participate in criminal and civil trials as jurors to represent the estimated 84,000 adults in Victoria who are blind or have low vision.

**Legal supports**

People with a disability are far more likely to be charged with a crime, or appear in front of the court. There are many reasons for this, from a misunderstanding about how their disability is perceived by others, through to a diminished capacity to understand the law. Additionally, as many people with a disability have a far lower income and asset base, they are less able to pay for court costs.

Between 21-30% of Legal Aid clients in Victoria have some form of disability, and of these, between 15-41% of Legal Aid clients with a disability were receiving the Disability Support Pension.[[4]](#footnote-4) Adequate funding and legal supports for people with a disability is of utmost importance to ensure equal access to justice, and equal treatment before the law.

### Independent voting

**Recommendation:** That the State Disability Plan require the implementation of an accessible system that offers independent and secret voting, equivalent to the NSW iVote System.

The right to a confidential and independent vote is taken for granted by most people – astonishingly, at the 2014 Victorian election, there was no way for people who are blind or have low vision to cast a secret and independent vote.

By establishing the iVote system, NSW became the national leader on accessible voting – allowing anyone with a disability, restricted mobility, reading difficulty, or those in a remote, interstate or overseas location to vote independently, in secret and on election day.

There is currently a Victorian Parliamentary Inquiry into Electronic Voting. This should inform the State Disability Plan, incorporating the principle that the blindness and low vision community deserves secret and independent voting options at both Council and State elections – rather than having to rely on others to complete a ballot paper on their behalf, and trust that this has been recorded accurately.

## Theme 2: Rights and equality

### Enforceability of rights

**Recommendation:** That the State Disability Plan should require a review of the current legal protections for people with disability in Victoria, in order to provide a clearer means of redress where required – including through the introduction of penalties in cases of breaches and non-compliance.

The issue of the enforceability of rights is as critical to people who are blind or have low vision, as it is to the broader community. Yet in some essential circumstances, they are denied any mechanism of enforceability or redress in Victoria. One example among many is the discrimination experienced by people with a disability in the company of their Seeing Eye Dog (SED), Guide Dog or Assistance Animal.

In Victoria, legislation pertaining to the right of access for assistance dogs is documented to a limited extent, in the Domestic Animals Act 1994 (Vic) (DAA), which allows for a visually or hearing impaired person, or dog trainer, to be accompanied by a dog “at all times and in all places” (s7). However, the DAA does not provide an enforcement mechanism for the right of access when in the company of a trained and accredited assistance dog. It does not impose obligations upon anyone and does not contain a sanction or penalties if a person with disability, accompanied by an assistance animal, is refused access to any place where that person is entitled admission.

In theory, enforcement could only be achieved by complaints to the Australian Human Rights Commission under the Disability Discrimination Act 1992 (Cth) (s9) (DDA). Currently, under this system, making a complaint is a lengthy process and reliance on conciliation processes for redress avoids robust and proactive defence of legal rights. This conundrum was previously addressed by the Victorian Law Reform Commission report in 2009 that noted the confusion inherent in the conflicting obligations of many laws dealing with assistance animals.[[5]](#footnote-5)

In Victoria, a more immediate means for remedy is needed to mitigate the shortcomings of the DDA complaints process. Until this is addressed, people accompanied by their Seeing Eye Dog will continue to experience discrimination when catching taxis, dining or travelling – negatively impacting both their mobility and social inclusion.

The situation is also made worse for Victorians travelling interstate, as the rules and regulations regarding assistance animals vary from state to state. While specific legislative change is beyond the scope of the State Disability Plan, to achieve a more consistent approach, Vision Australia recommends repealing section 7 of the Domestic Animals Act 1994 and enacting a new law replicating the Guide, Hearing and Assistance Dog Act 2009 (Qld). We further recommend elevating discussions about a consistent national approach onto the COAG agenda.

### Access to housing and the right to independent living

**Recommendation:** That the State Disability Plan acknowledges the right to independent living for people with disability, and that a Disability Housing Strategy be developed to overcome the barriers faced in access to housing.

Article 19 of the UN Convention on the Rights of People with Disability states that they have the right to ‘choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement.’ The situation for people who are blind or have low vision is underpinned by poor social or economic circumstances, and inadequate or inappropriate housing is a key barrier to participation in the community.

People with disabilities face economic and social disadvantages that restrict their housing options, including:

* low incomes
* higher living costs
* potentially truncated working careers
* discrimination in the private rental market
* limited capacity to express their housing needs as an effective demand within the market[[6]](#footnote-6)

The access to adequate housing also allows for stability and removes many worries and concerns that people with blindness and low vision face about the security of their lives and living situations. This flows on to enabling meaningful participation in work and education to a far greater degree, as stability can mean:

* it becomes easier to commit to more consistent hours of work
* people can retain a central location and familiarity with their surrounds
* developing a feeling of certainty about their living situation, making it easier to identify suitable work

This issue encompasses the problem of home ownership as well – for sighted people, financial security often relies on the key asset of home ownership, but this is an asset that people with blindness or low vision struggle to attain.

In 2010 the Office of the Public Advocate in Victoria produced recommendations for improving access to housing for people with a disability, including the development of a Disability Housing Strategy. This has not been done. It also noted that ‘the provision of public housing to people with disabilities must therefore become a key priority within Victorian public policy [… and] increased investment in public housing, together with a greater level of disability-awareness, will result in a fairer and more effective service for vulnerable Victorians.’[[7]](#footnote-7)

### Access to information

**Recommendation:** That the State Disability Plan require that all Government departments and agencies develop and implement a plan to guarantee the provision and receipt of accessible and alternate formats of information, and embed this within procurement policies around Information Communications Technology (ICT) and service provision, in line with the European Accessible ICT Standard.

**Recommendation:** That the State Disability Plan requires all Government departments and agencies conduct robust consultation and testing of accessible platforms and technology by end-users with a disability. This should be undertaken at each stage of development and developers must recognise that compliance does not always equate to accessibility.

**Recommendation:** That the State Disability Plan encourage all community and business organisations to guarantee the provision and receipt of accessible and alternate formats of information, that is easy to obtain.

It is not uncommon for people who are blind or have low vision to be required to provide details by means of a printed form, which they are not able to complete independently. This is in effect a lack of access to information that has detrimental consequences for people’s equality, autonomy and independent and informed decision-making.

In practice, people who are blind or have low vision are often forced to rely on family or friends to assist them in meeting obligations imposed by Government laws or regulations. It is fair to say that many people who are blind or have low vision have come to regard a loss of privacy as the cost of living in a country that fails to promote and uphold their right to have equal and independent access to information. The reliance on assistance to provide information can cause long delays in accessing services, or in having concerns addressed – delays that do not exist for sighted community members.

The Victorian Government should conduct an immediate review of ICT Procurement Guidelines and consider adopting the approach taken in the European Accessible ICT Standard (Standards Australia are in the process of considering how to adopt this Standard). This will create a more enabling work environment for employees with disability, setting them up for success and future career progression.

Governments are not the only sources of inaccessible information. Many organisations, including essential service providers, still provide key information only in printed format and require that customers give information in printed format. Vision Australia often hears about clients having difficulty entering into contracts because they are not given information in an accessible format or are unable to complete documentation in standard print. This has consequences across all aspects of life and across the themes of the discussion paper: for example, it can negatively impact on people’s ability to access housing or receive financial advice and.

### Access to transport

**Recommendation:** That the State Disability Plan should include the principle of whole-of-journey accessibility alongside universal design principles as a foundation for transport planning and upgrades.

**Recommendation:** That the State Disability Plan includes the target that point-to-point transport systems become fully accessible.

The level of stress, inconvenience and disadvantage that people who are blind or have low vision continue to experience when they use public transport is entrenched and frequently understated. As people who are blind or have low vision cannot drive, there is an increased reliance on public transport for social and economic participation in the community. Unfortunately, it is rarely the case that this experience is the same as sighted peers, for the barriers and inconveniences faced combine to add time and stress to a journey that should be accessible for all.

**Whole-of-journey access**

The Commonwealth Disability Standards for Accessible Public Transport are currently under review: the State Disability Plan should take the new Standards into account to implement State based targets and goals for accessible public transport.

The concept of whole-of-journey accessibility should be embedded as a principle alongside universal design when considering transport planning, upgrades, and development. A particular railway station, tram stop or transport interchange might be accessible, but if the surrounding and connected road infrastructure is not, then in practice it will be impossible for a person with a disability to use the compliant component. A whole-of-journey framework would allow for greater attention to be given to the accessibility of interconnections between different parts of the public transport system.

The State Disability Plan should encourage additional improvements across the public transport network. An example is the *Accessible Public Transport in Victoria Action Plan 2013-17*, which has some actions and timelines that have not been met, or even when complete will not meet the needs of people who are blind or have low vision. For example, under *Outcome 2*, *Action 3*:

* PTV to work with transport operators to ensure regular audible manual or automated announcements, providing next service, arrival, and departure information, are made at all railway stations.

The delivery time table for the above action is ‘Ongoing’, yet this issue is one of the greatest barriers to accessible public transport our community faces. When announcements do not occur, or are incorrect, a person who is blind or has low vision may not have any way of knowing which train to take, which platform to wait at, or how to reach their destination, affecting both mobility and safety.

Additionally, the provision of audible announcements across the bus and tram network is entirely inconsistent, and is not limited to differences between old and new rolling stock – at times the announcements are simply not activated.

The above examples highlight the need to connect the overarching issues (access to transport) to relevant, specific, and meaningful actions in downstream Disability or Accessibility Plans in all areas of Victorian life.

**Point-to-point transport**

Point-to-point transport services include taxis and other service providers such as Uber. Vision Australia has made many submissions and representations to inquiries and consultations about taxi services and network standards, and we have made numerous and repeated recommendations and suggestions aimed at addressing the barriers present in service delivery. This includes taxi drivers who refuse to pick up passengers with Seeing Eye Dogs and other mobility aids; and zoning regulations (i.e. “no stopping” zones) which prevent taxis from stopping outside buildings in CBD areas, requiring passengers to navigate their way some distance unassisted from their drop off point to their destination.

However, we have seen little evidence that the extent or impact of these barriers have been reduced. Our clients tell us that, on the contrary, some barriers are increasing. Changes to the current system must address these barriers, and ensure that they are not extended or exacerbated by new forms of point-to-point transport.

Additionally, we have specifically recommended that concession and subsidisation schemes must be accessible across all forms of public transport. This would include extending the application of the Multi-Purpose Taxi Program (MPTP) to ride-sharing services, to give people with disability equitable access to the most affordable and convenient forms of public transport available.

### Freedom from violence and abuse

**Recommendation:** That the State Disability Plan acknowledge the need to consider freedom from violence and abuse for children, women and girls, and the elderly as separate but interrelated phenomena.

**Recommendation:** That the State Disability Plan should require Government funded Domestic and Family Violence services to provide information in an accessible format.

**Recommendation:** That the State Disability Plan requires additional research into incidence and preventative measures on the intersection between elder abuse and disability.

As noted in the Companion Document, the final report of the Royal Commission into Family Violence, and additional research[[8]](#footnote-8), people with a disability are more likely to be targeted as victims of violence. This is exacerbated when accounting for intersectional disadvantage, such as gender and sexuality, cultural, ethnic, or religious background, and age, among others.

The *Roadmap to Reform* announced in April 2016[[9]](#footnote-9) is a positive step. However, there is limited focus on the specific needs and risks faced by people with a disability, especially those with a sensory disability like blindness or low vision. In the past the disability sector has been seen as having independent concerns to the rest of the human services sector, yet to address violence and abuse there needs to be a greater focus on continuity in service and responsibility.

**Child safety**

The incidence of abuse and maltreatment for children with a disability is poorly researched, though two well regarded studies have estimated prevalence rates:

* Prevalence of maltreatment for children with a disability was found to be 3.4 times higher than for children without (31% compared against 9%).
* A global meta-analysis found estimated prevalence rates of 26.7% for violence in the lives of children with a disability.[[10]](#footnote-10)

Specific models of prevention and safeguarding should apply to children with a disability, in recognition of the far higher incidence and risk of abuse or maltreatment. At present, models to respond to the abuse of children with a disability do not recognise the complexity of those children’s lives, and may well be inadequate when the “joined up” policy of service provided by the NDIS comes into effect.[[11]](#footnote-11) The State Disability Plan should identify children with a disability as a high risk category, recognise that the Child FIRST and Child Protection systems should implement disability specific reporting and responses, and provide additional education to service providers, accounting for the new service environment of the NDIS.

**Women and girls**

Domestic and Family Violence services provide tremendous support to women and families affected by violence and abuse, yet they are not always accessible to women who are blind or have low vision. Frequent obstacles arise to accessing services, from a lack of access to information (inaccessible formats) about their rights or services, through to the increased reliance on their abuser in their daily lives.[[12]](#footnote-12)

**Abuse of elders with a disability**

People are far more likely to develop a vision impairment as they grow older. In addition, it is imperative to recognise that the underlying motivators of violence and abuse against people with disability intensify as people age, as the NSW Parliamentary Committee into Elder Abuse acknowledged.[[13]](#footnote-13) Older Victorians who are blind or have low vision are at increased risk of all forms of violence and abuse, and as they are more likely to require assistance with banking and ceding power of attorney, they are at particular risk of financial abuse.

The drivers and characteristics of elder abuse are different to other abuse types:

* Perpetrators are more likely to be sons or daughters rather than a partner
* Abuse onset is in old age rather than a long term pattern of behaviour
* Older men can be victims of elder abuse, though the incidence is still higher among older women.[[14]](#footnote-14)

Vision Australia acknowledges the limited research into the correlation between elder abuse and vision impairment. However, our anecdotal evidence suggests that alongside the elevated risk for older people with a disability generally, people who are blind or have low vision are at increased risk of abuse through isolation and neglect in Aged Care facilities, and an increased risk of financial abuse. Additional research should be conducted, and increased efforts made to address the abuse of elders with a disability.

### Access to health services

**Recommendation:** That the State Disability Plan aims to reduce the increased health costs and barriers to access that people with disability face, and that GPs and health providers are given training and information on disability sensitive service provision.

Current medical models and health practices in Victoria create greater risk for people who have low vision or blindness. There are a range of reasons for this, from inaccessible information and public health campaigns, to physical barriers at health services, and the increased stressors and time required to access services generally. There is some evidence that women with disabilities delay seeking medical attention until they are in a crisis situation; an issue for all people with a disability.[[15]](#footnote-15) Information for pharmaceutical products is also a particular issue within the blindness and low vision community, and businesses should be required to provide this in an accessible format.

### Universal design principles and the built environment

**Recommendation:** That the State Disability Plan adopts a broad view of universal design principles which embraces all forms of accessibility, including effective consultation and links across all planning and approval of works, technology based support for navigating the built environment, and whole-of-journey accessibility. Testing for functional accessibility, by people with disability, must become routine.

As noted above in *Access to transport*, universal design principles cannot stop at the door of a building. For future builds, planning, and construction works in public spaces, accessibility must be a focus. This includes short term disruptive works: navigating around closed footpaths, especially in the CBD, can be particularly disorienting and difficult for people who are blind or have low vision.

Issues frequently arise due to the disjointed nature of planning approvals and the negative outcomes when concurrent public and private building works occur in the same space. Clear policies and processes to ensure consultation, effective planning and whole-of-journey accessibility are needed to prevent this occurring in the future.

It must be acknowledged that the needs of people who are blind or have low vision cannot simply be met by providing physical access and assuming that accessibility is met. For instance, in an art gallery a ramp supports people with a physical disability to access the premises, but people with a vision impairment would have a completely different experience unless audio description of the exhibits was in place. The State Disability Plan should recognise that embedding universal design principles and efforts to improve accessibility of the built environment must take into account the wider considerations for meaningful social inclusion, including where alterations to the building and installations may take place.

## Theme 3: Economic participation

Vision Australia is extremely concerned over the reliance on Disability Support Pensions and high levels of under and unemployment in the blindness and low vision community. This undermines independence and long term life outcomes; it increases social isolation and reduces the ability to participate meaningfully in society. The very barriers that prevent people who are blind or have low vision from economic participation are reinforced by their own absence from the employment market, creating a cyclical block that must be overcome.

People who are blind or have low vision are exposed to fewer opportunities to improve their capacity to participate in economy than their sighted peers. This extends from the difficulty in acquiring soft/life skills and a lower rate of educational attainment, through to a dearth of early work experience and internship opportunities.

Further, economic participation for people who are blind or low vision frequently equates to menial employment. The true measure of success should be that a person who is blind or has low vision can match their skills and abilities to their vocation, in precisely the same manner as their sighted peers. There are many examples of the achievements of people who are blind or have low vision in fields as diverse as the law, sports, and academia: the capacity for others to reach their potential should not be limited by externally imposed obstacles.

### Employment

**Recommendation:** That the State Disability Plan should set an enforceable quota in the VPS for the employment of people with a disability. As a first step, Government should aim to double the current employment rate for people with disability in the VPS.

**Recommendation:** That the State Disability Plan incorporates relevant recommendations of the AHRC’s *Willing to Work* Inquiry[[16]](#footnote-16), and conduct diversity and inclusion programs across business and community sectors.

**Recommendation:** That the State Disability Plan requires the creation of a VPS Internship program supporting people who are blind or have low vision aged 18-21.

Jobs are critical to achieving a genuinely independent and economically sustainable lifestyle for people with disability. Vision Australia’s experience has shown that when a person with vision impairment is employed, both the employer and the candidate’s co-workers gain an increased knowledge of their skills and abilities, helping to break down barriers, improve career development opportunities, and enabling willing workers to make a valuable contribution to the economic and social fabric of our society.

As one of the largest employers across Victoria, the Government has a responsibility to play a key leadership role towards increasing employment of people with disability. The Victorian Government should create a targeted VPS internship for people who are blind or have low vision aged 18 to 21, to raise employability and off-set their lack of youth employment opportunities. Targets should be considered for the business and community sector, and increased supports for meeting these targets should be established.

The urgent need to improve recruitment and retention practices for people with a disability was highlighted by the *Willing to Work* Inquiry. Additionally, people who lose their vision mid-way through their career may be able to continue in their role with adequate supports, but equally they may require retraining and a career change. Young people who are blind or low vision often have lower levels of experience or work histories, as they cannot easily access the roles in fast-food or retail that their peers use to develop the life skills that benefit new job-seekers. The State Disability Plan needs to recognise the fluidity of the employment landscape for people who are blind or have low vision across various life stages.

To address this issue and to create more employment opportunities the Victorian government must:

* Review all recruitment practices through the lens of accessibility to ensure the entire selection process is accessible and non-discriminatory.
* Audit internal and external recruitment practices and agencies and mandate affirmative steps to support applicants with disability. This should include considering setting employment targets and quotas for recruiting agencies.

The *Willing to Work* Inquiry recommended that Government should work with universities to promote the implementation of diversity and inclusion modules in all management and related courses. The Government should also improve diversity awareness programs and campaigns across the business and community sectors – done effectively, these can erode the barriers to employment experienced by people with disability, and improve outcomes for independence through economic participation.

### Access to education

**Recommendation:** That the State Disability Plan should highlight the importance of support to families with children who are blind or have low vision to meet their developmental needs and improve life outcomes.

**Recommendation:** That the State Disability Plan should address the specific educational needs for people who have a disability, through committing to the ongoing support for the Expanded Core Curriculum.

**Recommendation:** That the State Disability Plan should improve the capacity of the education sector to make reasonable adjustments to support children who are blind or have low vision, making education settings more inclusive.

**Recommendation:** That the State Disability Plan should address the emerging area of Inherent Requirements and create a mechanism for their standardisation, ensuring they do not adversely affect the opportunities for students who are blind or have low vision to enrol.

**Developmental needs**

As for all children, meeting the development needs of children who are blind or have low vision is crucial to their long-term success. In particular, parents and families need additional support and education: this may include counselling and support to help them adjust to having a child with a vision impairment, an understanding of how to develop tactile and other sensory learning techniques, and support for early social skills development.

**Expanded core curriculum**

The Expanded Core Curriculum represents the body of knowledge, and soft life skills, that enable people who have a vision impairment to achieve success in education and other areas of life, including later employment. Broadly, it covers:

* compensatory or functional academic skills, including communication modes
* orientation and mobility
* social interaction skills
* independent living skills
* recreation and leisure skills
* career education
* use of assistive technology
* sensory efficiency skills
* self-determination

This additional curriculum should be embedded in education for people who are blind or have low vision, and the State Disability Plan should recognise its continued relevance to long-term positive life outcomes.

**Capacity of the education sector**

One of the enduring obstacles in education for people who are blind or have low vision is the often slow and reluctant implementation of reasonable adjustments. This includes making physical alterations to building access or furniture layout, through to providing alternate format curriculum materials, and assessment tasks. It is an ongoing concern at all levels of education, and reflects a systemic failure to acknowledge and respond to the needs of students with a vision impairment.

Frequently teaching and administration staff do not understand the needs of their students, or are slow and reluctant to support them by implementing adjustments. Particularly in higher education, bureaucratic processes for obtaining reasonable adjustments are unclear, unsupportive, and difficult to navigate: on many occasions adjustments are not made in a timely manner and students are required to begin courses without appropriate supports.

The State Disability Plan must support systems for responding in a timely manner to needs for adjustments and modifications to the built environment and curriculum provision so students who are blind or have low vision can reach their full potential. There should also be robust frameworks for education providers to engage with families and students in planning adjustments to curriculum and assessment tasks.

**Inherent requirements**

An emerging area of concern is the rise of Inherent Requirements (Core Requirements), which are being implemented for tertiary courses. This is a particular issue where universities or TAFEs may refuse a student the right to study based on perceived ability, a concern supported by anecdotal evidence from our clients.

For instance, this may arise in Social Work, where observation of children is required (and needs to be visual). Undertaking of a Bachelor of Social Work does not indicate an intention for working specifically with children: it may be a stepping stone to a Masters of Public Health, or drug rehabilitation programs, and as such, inherent requirements should not be imposed on assumptions for any particular job prospects upon completion of study. There is a risk that the non-standardised application of Inherent Requirements at various institutions will edge too close to assuming what the student’s job prospects are rather than their ability to complete the course.[[17]](#footnote-17)

### Access to the economy

**Recommendation:** That the State Disability Plan should require Government and businesses to implement accessible payment technologies across all aspects of the State economy.

Consideration of economic participation must extend beyond employment, and acknowledge broader access to the economy. While Vision Australia supports technological advances in payment options, many of these are inaccessible to people who are blind or have low vision. We believe that manual, accessible payment options should be retained.

For example, a number of our clients have recently reported that they are encountering gesture-based touchscreen payment terminals when shopping or in taxis. These are often completely inaccessible to our community members. Their only option when presented with such a terminal are either to give the sales person their PIN number, so that it can be entered using the touchscreen, or to avoid making purchases to preserve their privacy and security. It is clear that these terminals are being introduced with no regard to their impact.

Apple and Google have demonstrated that touchscreens can be made accessible to people who are blind or have low vision by developing the Voiceover and Talkback screen-reading software respectively, and there is no reason why similar technology could not be incorporated into gesture-based touchscreen payment terminals. It should be noted that without robust familiarisation, touchscreen technology (gesture based or otherwise) is inappropriate for many time-sensitive activities, such as electronic payments.

## Theme 4: Making the most of the NDIS

**Recommendation:** That the State Disability Plan should ensure that the Government develops responses to gaps in NDIS funding and service provision, to ensure Victorians with a disability receive adequate supports to participate in the community and are not worse off.

By 2019, there will be around 105,000 Victorians using the NDIS. Other people will access supports and information services provided by NDIS. Systemic social and attitudinal barriers to participation for people who are blind or have low vision will still exist: Individually Funded Packages (IFPs) through the NDIS do not offer a mechanism for systemic advocacy to identify and overcome these barriers. The National Disability Advocacy Program[[18]](#footnote-18), currently under review, can contribute to these efforts, but there should be an explicit commitment within the State Disability Plan that Government should work to reduce these systemic barriers.

The NDIS does not currently provide a seamless transition to and from mainstream services, especially in education. The State Disability Plan needs to provide for the coordination of services. It should address the actual and potential gaps in coverage for education, given that State and Federal funding for disability supports in education is inadequately low, and that NDIS stops at the school door.

Vision Australia has particular concerns for senior Victorians who are blind or have low vision: the NDIS does not cover them, yet the Aged Care system does not provide adequate supports. This also applies to the Information, Linkages, and Capacity Building elements of the NDIS. This is particularly pertinent when it comes to improving social inclusion and participation in community life, where people who have a disability and are elderly face a double disadvantage. It is imperative that we ensure seniors with a disability are supported appropriately.

There are questions about how the NDIA will ensure an equitable “spread of information and resources remain available to meet the needs of people with disability, their families and carers” when allocating ILC funds through a competitive grants process. For example, the NDIA may not be able to ensure all diagnostic groups, thin markets, remote and rural programs, community-based to national service providers, have equitable access to ILC funding. The State Government should consider addressing the gaps that will arise as a result.

## Driving Outcomes

**Recommendation:** That the State Disability Plan include the disaggregation of data by disability type, transparent reporting across the life of the Disability Plan, and strong mechanisms to include the views and experiences of people with a disability. This should be extended to require individual Departments comply with similar reporting requirements against their Disability Plans.

All data should be disaggregated according to disability cohort and there should be a category for permanent non-correctable blindness and low vision. This is the only way to effectively monitor what issues are affecting or occurring in the level of support provided to, and enjoyed by recipients, and accurately assessing the outcomes for each theme of the State Disability Plan.

There should be sanctions for non-achievement of outcomes – it is clear that targets and quotas only work with sanctions. For instance, if there is non-compliance with infrastructure standards, then a fine should be imposed. This should be supported by regular reporting timeframes. In general, doubling the current levels should be considered a reasonable target: i.e. employment rates, educational attainment being met. There should be targets directly related to disability as well, for each area covered by the State Disability Plan, such as learning outcomes specific for disability. The lived experience of people with disability must be included in this measures/outcomes process.

### Research priorities

**Recommendation:** That the State Disability Plan should require the development of a research framework to identify and monitor key issues facing people with a disability, and provide an evidence base for interventions.

One of the difficulties facing the sector is the lack of concrete evidence of data, trends, and causal factors surrounding the areas of concern for people with a disability. All too often, we are forced to rely on anecdotal evidence in determining what barriers people with blindness or low vision face, and how best to overcome them. There is a need for a research focus for supporting people with disability, aligned with the four themes of this discussion paper, and encompassing the various issues raised in this submission. This should in particular incorporate complaints around access, which are difficult to collate and measure, but highlight the often serious ramifications and impact experienced by people who are blind or have low vision when denied service by taxis, have transport services cancelled, or have other rights breached.

## About Vision Australia

Vision Australia is the largest provider of services to people who are blind, deafblind, or have low vision in Australia. It was formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies.

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. The service delivery areas include:

* early childhood
* aids and equipment
* orientation and mobility
* employment
* accessible information (including library services)
* recreation
* independent living
* Seeing Eye Dogs
* advocacy, and 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 our 27,500 clients and their families, and also through the 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 consultative framework, 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 formal liaison arrangement with Blind Citizens Australia (BCA) through a Memorandum of Understanding for a number of purposes, including collaboration, so that Vision Australia’s systemic advocacy and public policy positions are, wherever practicable, consistent with the programs and policies of Australia's peak body representing people who are blind or have low vision.

1. Mamre Association, *Disability Australia & Social Capital.* Available: <https://www.mamre.org.au/sites/mamre.org.au/files/docs/DISABILITY%20AUSTRALIA%20%26%20SOCIAL%20CAPITAL.pdf> This study had a limited sample size, and further research is needed. [↑](#footnote-ref-1)
2. Gotto, *et al*. 2010. *Accessing Social Capital: Implications for Persons with Disabilities.* A National Gateway to Self-Determination. [↑](#footnote-ref-2)
3. For example, Blind Sports Victoria: <http://blindsports.org.au/> [↑](#footnote-ref-3)
4. Jolic, R. 2016. *Victorian Legal Aid Client Profiles: Research Brief*. Victorian Legal Aid. [↑](#footnote-ref-4)
5. VLRC, 2009, *Assistance Animals: Final Report.*  [↑](#footnote-ref-5)
6. Beer, A. and Faulkner, D. 2009. *The Housing Careers of People with a Disability and Carers of People with a Disability.* Australian Housing and Urban Research Institute, Research Paper, Melbourne, pp.9-10. [↑](#footnote-ref-6)
7. Maguire, M, 2010. *The Public Housing Needs of People with Disabilities: Submission to the Inquiry into the Adequacy and Future Directions of Public Housing in Victoria.* Office of the Public Advocate, p. 10. [↑](#footnote-ref-7)
8. See: People With Disability & Domestic Violence NSW, 2015, *Women with Disability and Domestic and Family Violence*; Stop the Violence, 2013, *Background Paper: National Symposium on Violence Against Women and Girls with Disabilities.* [↑](#footnote-ref-8)
9. State of Victoria, DHHS, 2016, *Roadmap for Reform: Strong Families, Safe Children*. [↑](#footnote-ref-9)
10. See: Children With Disability Australia, 2013, *Enabling and Protecting: Issues Paper*, p.5. [↑](#footnote-ref-10)
11. Robinson, S, 2015, *Preventing Abuse of Children and Young People with Disability under the National Disability Insurance Scheme: A Brave New World?*, Australian Social Work, 68:4. [↑](#footnote-ref-11)
12. Stop the Violence, 2013, *Background Paper: National Symposium on Violence Against Women and Girls with Disabilities*, p.4-5*.* [↑](#footnote-ref-12)
13. State of NSW June 2016, Parliamentary General Standing Committee No. 2, *Elder Abuse in NSW*, Final Report. [↑](#footnote-ref-13)
14. Australian Association of Gerontology , 2016, *Submission to NSW Parliamentary Inquiry into Elder Abuse*, p.4. [↑](#footnote-ref-14)
15. Fairchild, S. 2002, Women with Disabilities: The Long Road to Equality, Journal of Human Behavior in the Social Environment, Vol.6 (2) 2002 [↑](#footnote-ref-15)
16. Australian Human Rights Commission. 2016: *Willing to Work*. In particular, see recommendations under Theme 1: g) and h). [↑](#footnote-ref-16)
17. Harvey, A, et al. 2016. *The Role of Inherent Requirement Statements in Australian Universities*. LaTrobe University. [↑](#footnote-ref-17)
18. See <https://www.dss.gov.au/our-responsibilities/disability-and-carers/program-services/for-people-with-disability/national-disability-advocacy-program-ndap> [↑](#footnote-ref-18)