

# Vision Australia’s Submission: NDIS Code of Conduct

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## Overview

Vision Australia is broadly supportive of the proposed NDIS Code of Conduct, and the broader NDIS Quality and Safeguarding Framework. We have provided feedback below, with the caveat that it is difficult to endorse the Code of Conduct without a clearer understanding of how it will be enforced by the NDIS Quality and Safeguards Commission.

## Response to Discussion Paper

### Access to information

Informed consent and informed decision making is crucial to an effective Code of Conduct and associated complaints mechanism. The NDIS does not have a good track record in providing information in accessible formats to participants and consumers. We urge that the Code of Conduct, and all related materials, forms, and documents, are made available in accessible formats, including: braille, large format, audio, and accessible online formats.

### Registered and non-registered providers

There should be no variance in the responsibilities between registered and non-registered providers. All service providers offering NDIS funded services, or claiming funding from the NDIS, must be held to the same standard. Anything less risks the safety and wellbeing of participants, and will undermine service standards. If need be, the powers of the NDIS Quality and Safeguards Commission should be expanded to account for this change to the Code of Conduct.

### Rights of children with disability

The Code of Conduct applies to children across the majority of the nine specific obligations. There is a lack of clarity around how this Code of Conduct, and the NDIS Quality and Safeguards Commission, will interact with State and Territory child protection, safety and wellbeing legislation. While the state based legislation for children is being retained, there must be specific guidance on how this applies within the Code of Conduct.

### Online

The Code of Conduct does not adequately account for the online safety of participants and consumers. There should be explicit acknowledgement that social media, and other forms of online communication, must meet the same standards as other forms of interaction with participants and consumers.

## About Vision Australia

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

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

* Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
* Aids and Equipment, and Assistive/Adaptive Technology training and support
* Seeing Eye Dogs
* National Library Services
* Early childhood and education services, and Feelix Library for 0-7 year olds
* Employment services, including national Disability Employment Services provider
* Accessible information, and Alternate Format Production
* Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
* Spectacles Program for the NSW Government
* Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

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