



Blind Citizens Australia

Ph 1800 033 660 | E bca@bca.org.au | W bca.org.au | ABN 90 006 985 226

National Disability Strategy Stage 2 Review Planning and Response

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To:

National Disability Governance and Engagement Section

Department of Social Services

GPO Box 9820

Canberra ACT 2601

Email: disabilityreform@dss.gov.au

Contact:

Rikki Chaplin

Acting Policy & Advocacy Team Leader

Blind Citizens Australia

Phone: (03) 9654 1400

Email: rikki.chaplin@bca.org.au

Background

Blind Citizens Australia (BCA) is the national representative organisation of people who are blind or vision impaired. Our mission is to inform, connect, and empower Australians who are blind or vision impaired and the broader community.

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 a majority of our staff are blind or vision impaired.

Blind Citizens Australia (BCA) is responding to the Stage 2 consultations of the National Disability Strategy review, as the strategy impacts people who are blind or vision impaired. The national disability strategy is an important initiative which serves to unify federal, state and local measures to ensure that people with disabilities are fully included in every aspect of life in society. The current strategy has resulted in the development and implementation of the National Disability Insurance Scheme (NDIS), a significant reform of disability services in Australia. BCA appreciates the opportunity to contribute to the consultation on the development of the upcoming National Disability Strategy. There will inevitably be issues which must be addressed for people who are blind or vision impaired as each ten year strategy comes up for review. Our response outlines what these issues are currently, and discusses the recommendations we suggest.

Question 1: Do you have any comments on the vision and outcome areas being proposed for the new National Disability Strategy?

BCA supports the proposed changes to the vision statement outlined in the issues paper which informs the consultation on the national disability strategy.

BCA recommends that the Statement should read: An inclusive Australian society that ensures that people with disabilities are able to fulfil their potential as equal members of the community. The proposed recommendation is that the words “that enable” be changed to “that ensures that people with disabilities are able...” The words “that enable” can be seen as pejorative and suggests that people with disabilities have no agency.

BCA continues to support the 6 outcome areas proposed in the new strategy.

1. Economic security
2. Inclusive and accessible communities
3. Rights protection, justice and legislation
4. Personal and community support
5. Learning and support
6. Health and wellbeing

BCA has some comments with respect to the six outcome statements:

Economic Security.

“Economic security can include such things as having an income and having a job.”

People cannot gain economic security without an income stream. However, many people who are blind or vision impaired have significant difficulties in gaining and keeping employment.

BCA receives numerous requests for advocacy where employment discrimination has occurred, such as the following example:

“Last year in 2019, an organisation advertised for 200 NDIS Local Area coordinator (LAC) positions. The job advertisement stated that ‘If you are a woman, person with disability, or from an Aboriginal or Torres Strait Islander background, or, from a culturally and linguistically diverse (CALD) background, you are strongly encouraged to apply for these positions.’ I am a woman with a disability from a CALD background, with many years of work experience, working with refugees, migrants, and people with disability, in various positions. I believe five or six other people who were blind had also applied for the positions, but none of us were employed.”

When this same woman applied for another job, she had her interview cancelled, when she advised the contact person that she was blind. “When I told the person, who was arranging my interview time on the phone, that I was blind, she cancelled my interview, without even meeting me.”

People who are blind or vision impaired are often under-employed, employed below their capacity and qualification level, and often have little to no support within workplaces.

BCA receives many inquiries from people who have tertiary qualifications, yet they are employed doing low-level, unskilled jobs. Additionally, many employers do not recognise their obligation to provide reasonable adjustments and accessible systems within the workplace.

“My team leader told me that my accessibility needs weren’t part of her job description. She saw making my workplace accessible - a necessity for me to do my job - as an inconvenience and felt that someone else should be in the position. She suggested that I was responsible for overcoming the challenges presented within the workplace, and the solutions should have come with me to the role.”

Vision impairment and blindness are often misunderstood by employers, who consistently utilise inaccessible software and technology that hinders full participation in the workplace. The

inaccessibility of IT systems rapidly becomes a commentary on the individual's ability to do the job. Employers often expect 150% work performance from a person with a disability, expecting a higher level of performance in order for the person who is blind or vision impaired, to be credited with the same recognition given to employees without a disability.ⁱⁱⁱ

The Willing to Work report produced in 2016 identified that the major barriers are negative assumptions and attitudes held by employers and the wider community. This includes misconceptions about the productivity and capability of people with disabilities, and that they present a higher risk for workplace health and safety.ⁱⁱⁱ

If people who are blind or vision impaired are not able to participate fully in the employment market, they cannot achieve economic security and thus will be continually marginalised. There are very few people with disability who are employed at middle or senior management levels. An impact of this absence of people who could be in a position to influence organisational culture and policy, is that little has changed for people who are blind or vision impaired in the workplace. Discrimination, driven through misunderstanding, continues to occur for people who are blind or vision impaired in entry level or relatively junior positions. There would be a possibility for positive change if more people who are blind or vision impaired were employed in senior positions, with accessibly designed technology infrastructure to support them.

Through funding provided to Blind Citizens Australia (BCA) as part of the National Disability Insurance Agency's (NDIA's) Information, Linkages and Capacity Building (ILC) Grant, BCA created 'An Eye to the Future'; a program that recognises the potential of people who are blind or vision impaired as reliable, dedicated employees in multiple sectors and with many varied skill sets. We are building a community that will share information, insights and resources to support both employees and employers. To assist those looking for work with tools and mentoring. To support hiring managers to create a workforce that is diverse and dynamic. To challenge perceptions. More information can be found at www.eyetothefuture.com.au

BCA has worked in conjunction with the broader disability sector to highlight issues for people receiving and applying for the Disability Support Pension (DSP). This poses challenges for people who are not legally blind, but have a significant vision impairment. Other advocacy organisations

report that it is becoming more and more difficult for people with legitimate disabilities to claim the disability support pension, and that those who do receive it are subject to mutual obligation requirements. The process and systems to access the DSP hinder entry for people who require income support. The Disability Support Pension is not adequate to protect recipients from poverty. Consequently, it is not a life choice that people with disabilities would make as their first option for gaining an income. Employment is a far more preferable option when considering which form of income one would choose to receive. BCA therefore supports the call of the broader advocacy sector to introduce measures that will lead to far greater employment for people with disabilities. The need for this to occur is borne out in the examples cited in BCA's response.

Recommendations:

- BCA recommends that the Disability Discrimination Act 1992 (DDA) be strengthened with respect to equal access to employment. This will give more people who are blind or vision impaired some realistic recourse when issues of discrimination occur while attempting to access employment.
- BCA recommends additional training for employers and recruiters to ensure accessible and equal employment practices.
- BCA recommends that education on the contributions of people who are blind or vision impaired in the workplace be compulsory.

It is a better understanding within the broader community and among employers, that will enable people who are blind or vision impaired to have greater economic security. Strengthening the Disability Discrimination Act 1992 (DDA) will provide a stronger mechanism for complaints to be raised and carried through, if discrimination on the grounds of disability does occur.

Inclusive and Accessible communities.

People with disabilities live in accessible and well-designed communities with opportunities for full inclusion in social, economic, sporting and cultural life.

The COVID-19 pandemic has demonstrated how the lack of accessibility within Australian communities impacts on people who are blind or vision impaired. For example most, if not all of the

initial information distributed by government was totally inaccessible. Television advertisements that contained silence and written information on screen are not accessible to people who are blind or vision impaired.

Supermarkets utilised written signs and non-tactile floor markers for traffic control. Transport authorities utilised non-tactile markers such as stickers and dots, to indicate where people should sit or stand. These methods of information provision and communication were not accessible for people who are blind or vision impaired.

Leaving people who are blind or vision impaired out of the communication strategy, is not a sign of an accessible community.

Another example of developments which have led to exclusion of people who are blind or vision impaired can be found in the banking sector. BCA have an excellent relationship with the financial sector. This has led to many innovations being implemented. However, the increased use of touch screens to conduct transactions or withdrawals for example, means that people who are blind or vision impaired are not guaranteed consistent and reliable access to banking services. A touch screen driven device must be designed in a way that is intuitive, and should be done with genuine consultation between developers and people who are blind or vision impaired themselves, if such devices are to be used at all. The banking sector has developed a new set of accessibility standards which broadly recognise that accessibility considerations must be at the forefront of the development of new technologies which underpin banking services. However, these new accessibility standards are not mandatory. While banks have committed to adhering to the standards, they are not forced to do so. This creates the ongoing risk that people who are blind or vision impaired will be excluded from freedom of choice about which banking products they access, and prevented from completing everyday tasks that people who do not have disabilities take for granted. One major bank rolled out an EFTPOS machine which is still in use today, that is inaccessible to people who are blind or vision impaired. While accessibility features were built into the device, this was not carried out in consultation, from the outset, with people who are blind or vision impaired. Hence, people continue to be unable to use the device independently to make payments, which can lead to humiliation for people experiencing this discriminatory practice. If legislation had been introduced which require

banks to design products with genuine consultation and co-design practices being conducted from the very beginning of the design process, this situation could have been avoided.

BCA promotes the view that outcomes aimed at enhancing access and inclusion for people with disabilities will ultimately benefit all Australians. The National Disability Strategy clearly articulates the importance of universal design. Universal design refers to the development of products and services which ensure that any person, regardless of disability type or other challenges they face, can easily use a product or service due to its accessibility for all.

“Taking a universal design approach to programs, services and facilities is an effective way to remove barriers that exclude people with disabilities. Universal design allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings, transport, products and services without the need for specialised or adapted features.”

Recommendations:

- BCA recommends that material publicised for public safety be provided in accessible formats, and messages are promoted via multiple mediums (eg TV, radio, internet, social media) so that all people with a disability have access to vital information.
- We recommend the use of tactile markers on public transport, on supermarket floors and in other public areas that require a person with a vision impairment to navigate, taking into account the need for social distancing.
- BCA recommends that all televised information campaigns contain information in written and verbal formats to ensure that the information is accessible for people who are blind or vision impaired.
- BCA recommends that people who are blind or vision impaired be genuinely consulted where decisions of what constitutes inclusive and accessible services, products and communities are being considered
- BCA recommends that state and federal governments work with the financial industry in the development and implementation of regulations to ensure that all Australians have equal and independent access to banking.

Rights Protection, Justice, and Legislation.

People with disabilities feel safe and have their rights promoted, upheld, and protected.

Justice and Legislation.

It is the right of every Australian to have freedom of access to shops, cafes, and all other community utilities and facilities, including education, recreation and employment.

Through our advocacy service, BCA receives a number of calls each week. Our advocates assist people who are blind or vision impaired to resolve issues that have arisen due to their blindness or vision impairment, that have violated their rights and have not been in keeping with natural justice.

People who are blind or vision impaired are still refused access to restaurants, taxis, and workplaces with their dog guides. People who are blind or vision impaired are faced with barriers to access to employment opportunities, education, and recreational activities.

A member contacted BCA recently to seek support when he was refused access to a restaurant with his dog guide. The reason given was that due to COVID-19 restrictions, they could not allow the person access to the restaurant with the dog.

This was a breach of justice for this member, as under the Disability Discrimination Act 1992 (DDA) our member has the right to enter a premises accompanied by his dog guide. Our advocacy service contacted the owner of the venue concerned and the situation was rectified. However our member was faced with not having dinner with his friends, due to his rights not being upheld at the time.

Members frequently contact BCA with issues around refusal of service by taxi drivers. Drivers often see the blind or vision impaired person with their dog guide and call in a “no show.” This is also true with ride share services. A woman contacted our advocacy service following a ride share driver advising her that his vehicle was beside her, when in fact he had not attended the job, so the vehicle was not there. This put our member at risk of significant harm; if she had entered a car with a stranger, she may have faced an adverse experience.

Another member contacted us, advising that she had applied for a job and when discussing an interview time with the contact person, she advised that she was vision impaired. The person subsequently cancelled her interview. This is a violation of this persons right to equal access to employment.

Members have advised BCA of attempts to seek redress through state based Equality of Employment Opportunity (EEO) commissions and the National Human Rights and Equal Opportunities Commission with little to no success. If a person, organisation, or employer refuses to participate fully in the conciliation process, there is no option for the aggrieved party to seek compensation, except through the Federal Court, which is prohibitively expensive and out of the reach of most people who are blind or vision impaired. Hence the people engaging in discriminatory practices continue to do so without any penalty, so the practice persists.

Additionally, where taxis and ride share drivers are concerned, while individual companies have some disciplinary processes in place, it is not a transparent or standard process. There is no evidence that drivers are fined or penalised for their behaviour. The fines are inconsistent from state to state and are inconsistently applied.

While such issues arise, people who are blind or vision impaired may feel unsafe and are at risk. The denial of access to facilities, utilities and amenities is an obvious denial of their rights. The cases above illustrate how many people who are blind or vision impaired are not having their rights promoted, upheld, or protected. The Disability Discrimination Act (1992) is of little value and has no

real power. Complainants have reported to BCA advocates that they have been discouraged from seeking redress through the DDA, because if the matter is not resolved during conciliation, the only form of redress is through lengthy and costly legal proceedings.

Recommendations:

- BCA recommends that the rights and safety of people who are blind or vision impaired be promoted in the broader community.
- BCA recommends that taxi and ride share drivers are significantly penalised for refusing to pick up people who are blind or vision impaired, particularly those travelling with a dog guide. We further recommend that fines and penalties be consistent from state to state.
- BCA recommends that court proceedings, if they are necessary, be subsidised in order to remove the economic barrier preventing people with disabilities from pursuing cases of discrimination further, if mediation by way of equal opportunity complaints processes does not result in a satisfactory outcome.

Personal and Community Support.

People with disabilities, their families and carers have access to a range of well-coordinated and effective disability services and supports that are appropriate for their needs.

Many people in Australia live in regional and rural areas. These areas are areas of thin markets. These people have little access to services of any kind, and specialist supports are often hundreds of kilometres away from their homes. A complicating factor is that these people, more often than not, do not have access to transport to attend appointments that are not within their local area.

Additionally, supports that are specific to people's needs are not always available. A member of BCA approached our advocacy team for assistance, due to an inability to access a service that could adequately support his needs. This person is deafblind and was seeking support from a person who could assist with vision issues and hearing loss. He was advised that none of the services in the capital city in which he lives could provide him with the support he required to live an independent life.

Another area in which people who are blind or vision impaired are faced with barriers to access, is housing. Many landlords will not rent premises to people who are blind or vision impaired and as we live in such a competitive housing market, it is often impossible to attribute the cause of lack of access to housing, to discrimination. However, BCA still receives large numbers of requests for assistance with housing issues.

Learning and support

People with disabilities have opportunities to participate in a high-quality education system that is responsive to their needs. People with disabilities have opportunities to continue learning throughout their lives in both formal and informal settings.

Over 4.3 million Australians have some form of disability. This roughly equates to 1 in every 5 or 18% of Australians having a disability.^{iv}

Despite this, there appears to be a significant discrepancy between people with disabilities achieving higher education and those without disabilities. This is often due to lack of support from unit coordinators or senior academic staff, or the inability to obtain the necessary technology or equipment.

Procurement of technology needs to be a high priority, whereby education institutions assist students to get the IT that meets their needs, through the appropriate channels. Educators reported frustration in attempting to procure the technology for their students, with funding not allocated to procure specific technology.

In considering how many Australians with disabilities are participating in education, a divide is revealed between people with disabilities compared to those without disabilities. Considering data for secondary education, completion of Year 12 was less common for older Australians, with or without disability, however data from the Australian Bureau of Statistics indicates that in the age bracket of 20-24, 64% of people with disability had completed Year 12 or equivalent, compared with 81% of people without disability (50–54, 31% compared with 51%; 85 and over, 15% compared with 16%).^v

“What support? I mostly did it for myself... The head of the school didn’t want me doing the course, so she made sure that the lecturers did nothing extra to support my needs. I think she was hoping I

would drop out before finishing the course. It was a battle the whole way... I was told by the head of school that no-one would ever employ a person with vision impairment, so I was wasting their [the TAFE's] time by doing the course.”

This is just as true in primary and secondary education, where we have received reports from students who have been unable to use their long canes in the schoolyard, due to safety concerns. They have also experienced significant delays in receiving study material in accessible formats.

Recommendations:

- BCA recommends the training of all academic staff in supporting the needs of people with disabilities, in particularly people with sensory disabilities. This area of disability is often overlooked, so staff are not trained in assisting people who are blind or vision impaired to obtain the materials they require.
- BCA recommends that children who are blind or vision impaired receive orientation and mobility training and individualised support in the school environment.
- BCA recommends the provision of appropriate IT and technical supports for students who are blind or vision impaired.
- BCA recommends that support staff ensure that reading materials are provided in an accessible format, in a timely manner
- BCA recommends that the federal government subsidises services to establish themselves in areas where thin markets exist.

Health and wellbeing

People with disabilities attain the highest possible health and wellbeing outcomes throughout their lives.

The Australian Bureau of Statistics (ABS), General Social Survey of 2014 reported that compared with people without disabilities, people with disabilities were less likely to report their health to be “good or excellent,” and were more likely to have experienced barriers in accessing healthcare.

Through our advocacy work, BCA has encountered instances of materials that were in an inaccessible format being provided to people who are blind or vision impaired who are accessing health care services. This means that a person who is blind or vision impaired is reliant on others to provide them with the correct information, rather than being given the agency to access and act upon the information as they wish.

A woman advised us that when she attended hospital for surgery, she was advised that as she was vision impaired, she was deemed a falls risk, so was not permitted to get out of bed without a nurse present.

“I was shocked and annoyed when the admissions nurse advised me that I was not allowed to get out of bed without a nurse or assistant present, as I may fall. This is despite my having excellent balance and having only experienced two or three falls throughout my entire life. During this stay in hospital, I rang the bell for assistance during the night, the nurse never turned up. I ended up just getting up on my own. The nurse then tried to tell me off for getting out of bed.”

Other individuals have advised us that their partner, carer or support worker is the one addressed by health care staff, rather than the provider speaking to the blind or vision impaired person directly, behaving as though the blind or vision impaired person is unable to respond for themselves.

It has also come to light that blind or vision impaired people have been asked to give private and sensitive information in a public area, with other people present, violating their confidentiality.

BCA has created a Healthcare Policy to better assist health care facilities to engage appropriately and respectfully with people who are blind or vision impaired. This policy is available on our website. It is however, difficult for frontline staff to be exposed to such a document, due to the fact that if we circulate the material to state health departments, the material does not often filter down to frontline staff. Additionally, there are often staff changes within health departments, which means that information of this nature is often lost.

The priority populations, although sufficiently identified, are not adequately addressed. The barriers still exist, as can be seen from the health care outcome for first nations people with disabilities.

In 2012 first nations people were 2.1 times more likely to indicate their health as fair or poor than non-first nations people^{vi}

Recommendations

- BCA recommends the adoption of our healthcare policy by all hospitals, to ensure a baseline standard of care quality for people who are vision impaired.
- BCA also supports the inclusion of first nations people and people from a cultural and linguistically diverse background who are blind or vision impaired, in consultations about improvements to current healthcare frameworks within which hospital and clinic staff operate. This would ensure that people who are blind or vision impaired are supported appropriately whilst undergoing medical interventions.

Question 2.

What do you think about the guiding principles proposed here?

The guiding principles of the United Nations Convention on the Rights of Persons with Disabilities, (UNCRPD), provide a solid framework to assist in creating a more inclusive, accessible, and equitable society. However, Australia continues to fall short in most of the areas outlined under the guiding principles.^{vii}

A review of Australia's response to the UNCRPD in 2019, states that: "There is still no legislative protection for people with disabilities experiencing systemic, intersectional, and multiple forms of discrimination, particularly at a commonwealth level. That people who identify as Aboriginal or Torres Strait Islander with disabilities are particularly disadvantaged and are often not consulted on matters

that affect them, and that the complaints mechanism under existing law, especially the Disability Discrimination Act 1992 (DDA) are inaccessible to persons with Disabilities.”^{viii}

People who are blind or vision impaired still face significant discrimination in gaining employment, as mentioned above. Additionally, access to education is also lacking for people who are blind or vision impaired. BCA advocacy staff have had numerous complaints about individuals being advised that they are not able to engage in specific courses of study, due to the blatant discrimination of academic staff.

People who are blind or vision impaired still face numerous barriers to full and equitable participation in society. Teachers and parents often have difficulty accessing appropriate technology for students. In particular, we received an inquiry from an individual, who had tried to obtain accessible technology for students at a school. He was advised that the person concerned was not permitted to do this, as the students could have a support person sitting next to them, assisting them to enter the data. This does not promote equal access to education.

Are there other principles that would help ensure policies and programs are right for people with disability, their family and carers?

As we continue to fall very short of fulfilling the existing principles, there is little to no value in including additional principles. It is better for us to ensure that we meet the current criteria, ensure compliance, and then look at how we can extend the principles.

What information or guidance could help organisations to use and adhere to these principles?

Ensuring that organisations have the principles available, refer to them, and provide examples of what each principle looks like in application, would help in the use and adherence to the principles. At this stage, the principles, although providing an overarching framework, do not provide a clear path to practical application.

Recommendations

- That the Disability Discrimination Act 1992 (DDA), and equivalent state legislation be strengthened to ensure that systemic, intersectional and multiple forms of discrimination are specifically outlined within the act.
- That state and commonwealth legislation be brought into line to be consistent throughout Australia.
- BCA recommends that the UNCRPD principles be distributed widely, to ensure that organisations, educational institutions and other establishments are aware of and adhere to these principles.
- That all Australian government and state government departments and agencies ensure that their policies, procedures, processes and actions reflect the non-discrimination of persons with a disability.

Question 3 What is your view on the proposal for the new Strategy to have a stronger emphasis on improving community attitudes across all outcome areas?

BCA agrees that a stronger emphasis on improving community attitudes is important and valuable. However, there needs to be some definition on what this actually means in practice.

Attitudes change slowly and often over generations. Thirty years after the adoption of the Disability Discrimination Act 1992 (DDA), we still have dog guides being refused access to public areas. People who are blind or vision impaired are still unemployed or under employed, and often employed at a level far below that which their experience and qualifications would indicate. In order to change community attitudes, we need to begin with ensuring that access and equity for people with disabilities becomes a compulsory component of the school curriculum from kindergarten to year 12.

However, we need to supplement the education of our children with implementation of access and equity for students at university level studying such courses as medicine, nursing, social work, psychology, education, social administration, and business. Without the introduction of training that is in depth and focuses on full and equitable participation, changes to community attitudes cannot occur.

People with disabilities need to be included at all levels of social endeavour, such as within the media, on television, in workplaces and taking centre stage at public events. For this to occur, local, state and federal government departments and agencies need to lead the way by promoting the engagement of people with disabilities.

Question 4

How do you think that clearly outlining what each government is responsible for could make it easier for people with disability to access the supports and services they need?

Clearly defining the areas of responsibility of the Federal government, those for which State governments have accountability, and those areas that fall under the management of Local government, would certainly be of assistance. It is not only a necessity for people with disabilities to understand, to whom they should make enquiries with respect to disability, but it would make it much clearer for all levels of government, agencies and organisations to navigate what can be an overwhelming system.

Access advisory groups play a vital role in ensuring that government departments have sufficient consultation mechanisms to highlight accessibility related issues, and act on recommendations from people with lived experience of disability. However, in the broader community, there is little knowledge of these access advisory groups. Particularly at local government levels, access advisory groups have been viewed as unimportant by some councils. The National Disability Strategy should require that access advisory groups are mandatory at local and state levels of government.

Furthermore, these committees should be promoted as a point of contact for members of the public, or people with disabilities, when they wish to raise access related concerns.

State governments play a critical role in providing support for people who are not eligible for the National Disability Insurance Scheme. For example, the taxi subsidy schemes in each state, remain vital for people who have no alternative access to transport funding. The desire of state governments to abolish these respective schemes is predicated on the belief that most people will have access to the NDIS, and consequently, access to transport funding. Particularly for people over the age of 65, and for those who do not qualify for the NDIS due to not meeting all criteria, the withdrawal of taxi subsidy schemes could result in their inability to fully access the community. Or, if they can still do so, those who are already economically disadvantaged will be far worse off than they are already. Taxi subsidy schemes vary in their level of support. This is another factor that needs to be addressed in their administration. For example, a person who is blind or vision impaired in Victoria can receive a half price fare up to the value of \$60, (\$120 for the full fare), but is means tested as a criterion for entering the scheme. People in Queensland only receive support for fares up to \$25 half price, (\$50 full fare). However, Queenslanders are not means tested, thereby allowing more people access to the scheme.

BCA recommends that taxi subsidy schemes are guaranteed to continue by all state governments to ensure the affordability of transport for people who cannot access the NDIS, and should remain available for NDIS participants until a more appropriate solution is found to funding transport at a more realistic level of subsidy through the NDIS.

Further, BCA recommends that state based taxi subsidy schemes are more streamlined between all states. The cost of transport for people who are blind or vision impaired is non-discretionary. It is even greater for people who live in regional and rural areas, and travel large distances to attend essential appointments and conduct other business.

State based schemes which enable people requiring assistive technology to access it are also essential, in order to provide people who are not eligible for the National Disability Insurance Scheme to have the same access to this technology. The term “assistive technology” refers to any aid or piece of equipment that helps a person with disabilities perform an everyday task. Wheelchairs, prosthetic limbs, electronic communication devices and home modifications like ramps are all examples of assistive technology. For people who are blind or vision impaired, this equipment includes dog guides, canes, screen-readers, magnifiers, smart phones and many other equipment solutions that assist a person who is blind or vision impaired on a daily basis. These solutions can allow people with disabilities to move around independently, communicate, undertake self-care and continue leading full, active lives. (<https://assistivetechnologyforall.org.au/>)

For many people who are blind or vision impaired, obtaining assistive technology remains a struggle, despite the introduction of schemes such as the National Disability Insurance Scheme, Job Access, and My Aged Care. Not everyone is eligible for these schemes. Of the approximately 4.3 million people with disabilities in Australia, only 500,000 people with disabilities will access the NDIS at its full capacity. Blindness and low vision is referred to as a “low incidence” disability, so there are likely to be many more people who have a vision impairment who are not legally blind, and so are not eligible for the NDIS. These people still require assistive technology to make maximum use of their existing vision.

One of the impacts of schemes such as the NDIS and My Aged care, is that service providers have been forced into a for-profit model of operation. This can mean that if a person who is blind or vision impaired does not have access to one of the national schemes, they are not funded to receive services such as orientation and mobility and occupational therapy. These services are particularly critical for a person who loses their vision later in life, as they allow the newly vision impaired individual to learn the skills which will enable them to function at their full capacity.

While it is possible to have funding allocated to items such as dog guide maintenance costs, orientation and mobility and assistive technology through My Aged Care, one has to receive a home care package to make coverage of these costs a possibility. People receiving the most basic aged

care package are not eligible for coverage of these supports and costs. Hence, people accessing the My Aged Care scheme do not have equal access to assistive technology and other supports, and could make far greater contributions to their local communities and their families in the longer term if they were guaranteed the same level of support, whether that be state or federally funded. It is critical therefore, that there are alternatives that are funded by state governments which fill this gap.

Question 5 How do you think the Strategy should represent the role that the non-government sector plays in improving outcomes for people with disability?

The examples discussed in response to this question demonstrate the crucial role that advocacy bodies such as BCA play in continuing to highlight inaccessibility and exclusion for people with disabilities. As innovations are created, technology changes, and services are introduced, it is the peak advocacy bodies who have the knowledge and analytical skills to determine how to best ensure that people with disabilities are genuinely included in all aspects of daily life.

As previously mentioned, employment of people who are blind or vision impaired, and indeed of people with all types of disabilities, is a key strategy to enable the inclusion of people with disabilities in everyday life. Employment creates dignity, enables people with disabilities to contribute to the daily functioning of society and the growth of the economy. People who are blind or vision impaired value employment highly when they do get the opportunity to fill paid roles and are therefore more likely to remain loyal to their employers for longer. As positive an attribute as this is, it could well be because people who are blind or vision impaired understand how difficult it is to gain employment again if they leave their paid employment. The willingness to employ people with disabilities, and the normalising of this principle, would allow people with disabilities to upskill, be competitive in applying for promotions, and transition from one role to another, as and when they choose. This is one way of creating genuine equity and equality for people with disabilities.

As also mentioned in our response to question 1, providing information about critical issues which affect all citizens, such as that pertaining to safety measures associated with Covid-19, is another essential strategy for genuine inclusion and support of people who are blind or vision impaired. Information access is one of the main barriers which prevents people who are blind, or vision impaired from demonstrating their full potential, making fully informed decisions, and pursuing the activities in which they wish to engage. Making information accessible does not have to be a complicated undertaking. As mentioned, making lines which indicate appropriate covid-19 social distancing boundaries tactile, is a simple way of conveying the same information that people who are sighted take for granted. Ensuring that websites and apps are designed according to web content accessibility guidelines (WCAG 2.1), and with genuine consultation with consumers who are blind or vision impaired from the beginning of the design process, should become standard practice for businesses, government departments and service providers alike. Web developers hired by businesses should be required to be knowledgeable about WCAG and should embed genuine consultation into their daily practice. This will not however, come to fruition without strong underpinning legislation requiring that all websites and apps be accessible to people who are blind or vision impaired.

The principle of making every aspect of life accessible via information which is provided in a manner which does not exclude the needs of people who are blind or vision impaired, must be enshrined firmly in legislation, with appropriate consequences when accessibility requirements have been ignored. Another common example of exclusion to critical information is the inaccessible design of home appliances. Many appliances in everyday use by sighted people, are designed with touch screens. Manufacturers of these appliances should be required, through legislation, to build products which are accessible to people who are blind or vision impaired. It is the lack of accessible methods to complete simple tasks such as washing clothes, changing the channel on a television, or operating a dishwasher, which reduce the independence and self-reliance of people who are blind or vision impaired.

Legislation requiring accessibility of such products should make the application of the principle of universal design mandatory. Universal design of products ensures that any person, regardless of

disability, can operate a product. The principle of universal design, when applied across a myriad of contexts, would amount to a guarantee that people with disabilities would be included in the considerations of how products and services should be designed and implemented.

Similarly, companies who sell appliances should also be required to sell products which are guaranteed to be accessible, or face consequences. Without legislation, ensuring accessibility will not be guaranteed, as there is no incentive to make this happen.

It is not possible for small businesses in particular, to be able to provide some information, such as invoices, product manuals or receipts, in every available accessible format. As discussed at a recent forum held by members of BCA, it is therefore necessary for individuals who are blind or vision impaired to initiate a relationship with the business or service provider from whom they are purchasing, to discuss their needs. What is critical, is that when a request is made for a particular document to be provided in a person's chosen format, businesses respond positively and accommodate the needs of their customers. It is when such a request is denied that exclusion occurs. It is acknowledged that the cost of providing all information in multiple accessible formats as a matter of course, is prohibitive for many businesses. However, a one-off or occasional request should not be very costly. Accommodating the needs of someone who is blind or vision impaired should be regarded as no more than high quality customer service. Physically showing someone who is blind, or vision impaired a product for example, is often regarded as good customer service. There are many businesses who go the extra mile to ensure that a customer who is blind or vision impaired is fully informed about what they are buying, from food to home appliances. The embedding of the principle that meeting a person's needs, regardless of what they are, should become common practice.

Question 6 What kind of information on the Strategy's progress should governments make available to the public and how often should this information be made available?

It is important that reporting, which details the progress, or lack of progress, in the improvement of the lives of people with disabilities, is done in such a way as to accurately convey the information, whether positive or negative. Reporting cannot be carried out in a self-congratulatory manner, with the motivation of making government appear to be successful in order to create a façade which may not reflect reality. Even if reports are negative in nature, such information may serve the purpose of drawing attention to the situations faced by people with disabilities for the general public, which may in turn result in positive changes over time to how the community regards and treats people with disabilities.

Reporting instances where discrimination has occurred is also important, as this information serves as an educational vehicle for individuals, businesses and government agencies which will hopefully result in the prevention of further discrimination. Again, this will only be effective if legislation regarding disability discrimination is made far more robust. If there are no consequences when discrimination or exclusion occurs, reporting, and the publicising of such reports, will have little impact on the attitudes and practices of the community.

Reporting should occur regularly, such as every quarter, in order for the community as a whole to evaluate what real progress is being made in the improvement of the lives of people with disabilities. The reporting process should operate in a manner that seeks to educate everybody about the state of play for people with disabilities in the community. Reports need to be readily available for the public to access, in order to keep the awareness of the impact of disability high on everybody's radar, as individual citizens, in our professional practice, and as a collective.

Question 7 What do you think of the proposal to have Targeted Action Plans that focus on making improvements in specific areas within a defined period of time (for example within one, two or three years)?

There is no denying that the implementation of targeted action plans would be a positive step which demonstrates a commitment to the improvement of life overall, for people with disabilities. Again however, the lack of appropriate disability discrimination legislation will more than likely be a barrier to taking such implementation seriously. If there are no consequences for failing to meet targets, there will be no incentive for remaining committed to those targets and ensuring that they are met. Previous National Disability Strategies have not resulted in the outcomes they sought to achieve. The 2002 accessible transport guidelines, while partially successful, have not resulted in any consistent or noticeable improvements for people in regional and rural areas in particular. This is more than likely because the standards were not underpinned by robust legislation, with penalties for transport companies who have demonstrated considerable apathy in ensuring that they meet the standards. Improvements have undoubtedly been made to the accessibility of public transport in urban areas.

BCA has worked with transport providers in Melbourne, Sydney and Brisbane to actively engage in consultation to ensure that future innovations in the transport sector are accessible and user friendly.

Infrastructure and public transport in regional and rural areas, however, are still problematic for people with all types of disability throughout Australia. Many buses still do not have onboard announcements identifying upcoming stops. Low floor buses are not consistently available for people who require them. Bus stops are not easily identifiable for people who are blind or vision impaired. Even in metropolitan areas, bus terminals, where multiple buses are pulling in simultaneously, are extremely difficult to navigate, with no clear indication of which bus is where, which is very inaccessible for people who are blind or vision impaired. This is the case some 18 years after the accessible transport standards were introduced.

It is true that the introduction of the standards has led to greater consultation with peak advocacy bodies and the establishment of access advisory committees. BCA has made a conscious effort to be

involved in the work of these committees, and this work has resulted in positive outcomes. However, there is much work that still needs to be done to make transport uniformly, and universally accessible throughout Australia.

This is an example of the difficulties in consistent implementation of policies or standards when underpinning legislation is weak, or non-existent. BCA supports the introduction of action plans that are outcome driven. However, it is imperative that the Disability Discrimination Act (DDA 1992) be significantly strengthened and be more detailed, in order to ensure that the action plans are in fact implemented and carried out.

Question 8 How could the proposed Engagement Plan ensure people with disabilities, and the disability community, are involved in delivering and monitoring the next Strategy?

As described in our introduction, BCA is a peak body which is member driven, established by people who are blind or vision impaired. It is therefore our own voice which is heard when we make submissions or attend consultation workshops and forums. This is an important distinction to make from the representation of people with disabilities which service providers claim to make. Peak bodies such as BCA need to be the organisations approached by policy makers when engaging in consultation. Public consultations need to be welcoming of people with disabilities as individuals, and peak organisations. Because BCA is member driven, we routinely conduct internal consultations with our members to determine what position to take, and what is most representative of the majority view on any given issue. We are therefore well equipped to provide considered advice and input, based on direct feedback from our members and constituents.

BCA liaises regularly with the broader advocacy sector, and is a member of the Australian Federation Of Disability Organisations (AFDO). BCA's work in this broader context is important in ensuring that key issues which have an impact on people with different types of disabilities are raised with a united voice, and that recommendations for addressing them are agreed upon across the sector. While there

are some issues which affect people with particular disabilities specifically, there are matters which will affect people with all types of disabilities in similar ways.

It therefore follows, that the new National Disability Strategy should recognise the need for ongoing funding for the advocacy sector, at a level which enables peak advocacy bodies to be resourced well enough to collect, access and analyse pertinent data which informs our advocacy. Without funding that is generous, the use of evidence based techniques becomes very difficult.

It is vital for the advocacy sector to be able to continue carrying out its very important work. In order to have this work regarded as valid, and based on accurate evidence, funding for the advocacy sector must be incorporated into the new National Disability Strategy, and for all future strategies.

ⁱ Thomas S, and Wolfensberger W, (1999) An Overview of Social Role Valorisation. In Flynn RJ, and Lemay RA. A Quarter Century of Normalisation and Social Role Valorisation: Evolution and Impact. University of Ottawa Press.

ⁱⁱⁱ Willing to Work Report (2016). Australian Human Rights and Equal Opportunity Commission.

^{iv} Australian Institute of Health and Welfare September 2019. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/personal-factors/prevalence-of-disability>

^v Australian Bureau of Statistics – Survey of Disability, Aging, and Carers (2009).

^{vi} <https://www.abs.gov.au/statistics/people/aboriginal-and-torres-strait-islander-peoples/national-aboriginal-and-torres-strait-islander-health-survey/2018-19#disability>

^{vii} Guiding Principles of the Convention – United Nations Enable; <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/guiding-principles-of-the-convention.html>

^{viii} <https://www.afdo.org.au/wp-content/uploads/2019/09/UN-Outcomes-Report-on-Australia.pdf>