



# Submission to the Disability Care and Support Inquiry

by the Australian Communications Consumer Action Network to the  
Productivity Commission



April 2011



The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will activate its broad and diverse membership base to campaign to get a better deal for all communications consumers.

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# Introduction

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ACCAN is pleased to have the opportunity to respond to the Productivity Commission (the Commission) Disability Care and Support Draft Report (the Report).

We applaud the wide consultation that the Commission has undertaken with the disability community in developing this Report. ACCAN believes that the proposed National Disability Insurance Scheme has the potential to transform how disability is treated in Australian society.

## Response to Productivity Commission draft report: Disability Care and Support

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ACCAN supports in principle the Commission's finding that the current disability support system in Australia is fractured and in need of transformation.

However, as we stated in our submission to the Commission's initial inquiry, ACCAN does not claim to have the expertise to comment on best-practice governance, funding models or eligibility criteria for such a scheme. We do however have the expertise to inform the Commission's inquiry on the telecommunications and information technology needs of Australian consumers living with disability.

Access to information and communications technology is integral to social, economic and cultural inclusion in the Australian community of the twenty-first century. This is no different for Australian consumers living with disability. In fact, for many people with disability, access to ICT is the paramount enabler for participation and social inclusion.

The Australian information and communications technology environment is changing the way we interact with each other, businesses and institutions, as well as the way we access government information and services. Without full and equitable access to this burgeoning digital society Australian consumers with disability are at risk of becoming more disadvantaged as the digital divide between consumers with disability and their non-disabled counterparts widens.

The current sources for funding the ICT equipment needs of Australian consumers with disability is a patchwork of differing local, State, Territory and Commonwealth public and private programs. Given this disparity of funding sources, ACCAN believes one of the fundamental responsibilities of any national disability insurance scheme is ensuring that all Australians living with disability have access to the information and communications technology equipment and services that will allow them to independently and equitably participate in our digital society.



The current programs that provide equipment for telecommunications equipment are outdated and limit people with disability to the bare minimum in telecommunications services. Fixed-line voice equivalent in-home access is no longer the most common telecommunications service in Australia. Yet this is the only information and communications technology that many Australian consumers with disability are able to access.

Current telecommunications disability equipment programs are limited to providing voice equivalent fixed-line equipment at no additional cost to the consumer with disability. While this meets the requirements of the Universal Service Obligation for telephone service providers it excludes consumers with disability from being able to independently access ICT when they are out and about in the community.

ACCAN recommends that any national disability support scheme include provision for current ICT equipment in order that all Australians have access to the full breadth of ICT services. Any national disability insurance scheme must include funding arrangements that allow all eligible participants to access the information and communications equipment and services they need.

Equipment such as the Deafblind Communicator, a device that enables independent communication for people who are deafblind is not covered by any telecommunications disability equipment program. While the Deafblind Communicator can fulfil the fixed-line voice equivalent role of an in-home teletypewriter, its additional functionality and value as a portable teletypewriter and one-to-one communications device disqualify it from being included in the Universal Service Obligation disability equipment program.

ACCAN strongly believes that any national disability insurance scheme-funded support program must ensure that all consumers with disability have access to ICT equipment that can provide this level of independence and access.

We believe the role of the proposed National Disability Insurance Agency should be to provide funding for all ICT equipment that is not available through telecommunications disability equipment Programs. This needs to include:

- specialised equipment for disability specific access,
- specialised mainstream equipment which is beyond the cost of standard ICT mainstream equipment (e.g. smart phones), and
- funding of additional costs to access ICT services as a result of disability. For example, Deaf consumers who need higher broadband usage in order to access Video Relay Services (VRS) or communicate via real-time video connections, must be able to access funding to pay for these increased usage costs.

ACCAN does not support the Commission's recommendation that eligible recipients of NDIS funding pay a proposed \$500 annual excess. Our primary objection to this proposed excess is that people who need to access the NDIS funding for ICT equipment or services may be negatively financially impacted by this provision.

There are a number of further reasons why we see this proposal as being inappropriate. For example, the waiver for people who receive in-kind support from their families discriminates against people who do not have families who are able to provide in-kind support.



Many people living with disability are already incurring additional expense as a result of disability. For those people who need moderate financial support to access ICT equipment and services this annual \$500 excess will impose additional economic barriers to participation and inclusion.

For example, many consumers who are blind or vision impaired can only access mobile telephony via high-end smart phones which have text-to-speech functionality and a significantly higher cost.

The imposition of a \$500 excess payment in order to access funding for this equipment does little to ameliorate discrimination when a consumer who is sighted can purchase a standard mobile telephone for less than \$50.

## Conclusion

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ACCAN supports the Commission's recommendation that the Australian Government initiate a National Disability Insurance Agency to administer the proposed National Disability Insurance Scheme. However, we reiterate our recommendations made in our initial submission that the information and communication technology equipment and services needs of Australian consumers living with disability be included in the range of supports offered through this new scheme.