



4 May 2011

Inquiry into Disability Care and Support  
Productivity Commission  
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Deafness Forum of Australia, Blind Citizens Australia, the Australian DeafBlind Council and Deaf Australia write to you on behalf of the many people in Australia facing life with a sensory disability.

It is no longer acceptable that people who have a sensory disability find themselves isolated from life and interaction with the world around them. Australia has taken significant steps forward in changing this situation by ratifying the United Nations Convention on the Rights of Persons with Disabilities in 2008. However, upholding these rights is largely dependent on having access to adequate specialists and resources in the area of sensory disability.

It is of great concern that we note people over the age of 65 years will not be eligible under the National Disability Insurance Scheme ("NDIS"). Sensory disability can be both acquired and degenerative, and significantly affect a great number of people later in life in one form or another. For example:

- 75% of those over 70 have significant hearing loss; 37% are impacted by acquired (preventable) loss due primarily to workplace environments;
- 70% of those over 70 have significant vision loss; and
- approximately 281,000 people over the age of 65 have significant combined hearing and vision loss.

Any Australian with a sensory disability over the age of 65 years should be eligible for the NDIS. People who qualify for the NDIS prior to 65, shouldn't "age out" into an Aged Care system that is already under tremendous strain. Service and resource provision should be lifelong; and when a person's requirements change, supports and assistance should also change, as easily and smoothly as possible.

The current criteria stipulated for people to be eligible for the NDIS is that a person must present with a "severe or profound" disability. **Regardless of degree or level of loss** - vision, hearing or both vision and hearing - **it impacts upon all aspects of life**. Whether or not the loss is "severe or profound" or "mild or moderate", this loss creates severe to profound communications disabilities. People who have a sensory disability require ongoing support regardless of the extent of their disability. This must be taken into consideration in the eligibility criteria for the NDIS, given that we process 90% of the world around us via our hearing and sight.

When assessing a person who has a sensory disability, it is of critical importance that there is adequate access to the right professionals who are trained and aware of the issues faced. To clinically measure a person's sight loss and hearing loss is important (the "medical model"); however the degree of communication needs ("social model") must also be taken into consideration. Often the clinical diagnosis does not equate to the need for ongoing communication support and 1:1 human support to maximise social and economic participation in society (that is, inclusion). For people with a sensory disability, one is not relative to the other.

Most people with a sensory disability rely on adaptive technology in their day-to-day lives. Currently – and ludicrously – adaptive technology which enables them to participate fully in economic and social life is not considered "an essential communication tool" and therefore no funding is available for equipment (such as computer Braille output and screen magnifiers, vibrating alarms to notify of door, fire or phone). At present, only individuals who are undertaking employment are eligible for adaptive equipment to use within the workplace through JobAccess. This presents an anomaly, as an individual may be unable to become workready without sufficient skills and access to their own equipment, which compromises their ability to seek meaningful employment. Even devices such as hearing aids and cochlear implants are not considered "essential", and once a person turns 21 these are no longer funded.

Many of these adaptive devices are expensive - up to \$10,000 per ear, for hearing aids/implants, for example, for those with hearing impairment. For the vision impaired, a braille note-taking device can cost anywhere from \$3000 for the most basic display through to \$11,500. Global positioning systems (GPS) - which assist people to independently navigate an environment - can cost up to \$2000. A daisy book reader to enable a person to read audio materials in their own home is around \$600. Computer based software, such as screen reading software, text enlargement or braille translating problems can range from several hundred to a thousand dollars for licensing and renewal costs. These estimates do not take into the account the need for supplementary technology, such as a computer with adequate memory, mobile phones which have the capacity to run speech software and other items, such as magnifiers, to make living a quality life possible.

**This is unacceptable. Accessible and affordable technology is essential in the life of a person with a sensory disability to permit them to participate more fully in the wider community.**

***"Affordable access to communications services and information technologies enables economic participation and promotes inclusive communities, as well as assisting people to live independently."*** (Connecting Us All: the Role of the National Disability Strategy, ACCAN, 2011).

The inclusion of aids and equipment within the NDIS would not only benefit and increase the independence of individuals, but could also reduce the need for additional supports. Many older people with a vision or hearing impairment are reliant on family, friends or community volunteers (eg through HACC programs) to assist with reading mail, accessing print materials and using household items which may be inaccessible. The provision of adaptive equipment could alleviate much of this need and improve independent living. This would also provide cost offsets in the provision of direct support to individuals, and lead to long term costs savings for the NDIS.

We note that the Commission recommends an amount of \$6.2b to fund an NDIS. We are concerned that this amount may not be a true and realistic value. Current estimates in the draft Productivity Commission report are that approximately 360,000 Australians will qualify under current proposed guidelines for (Tier 3) support under the NDIS. Given that one in six Australians (approximately 4 million) are Deaf/have significant hearing impairment, some 300,000 are Blind/vision impaired, and approximately 288,000 people are deafblind this equates to a total of **over 4 million Australians with some form of significant sensory disability**. We are concerned that the Productivity Commission's figure is extremely conservative; and that many people needing assistance, particularly those with a sensory disability, will be unable to attain the necessary minimum level of support.

While the Productivity Commission has suggested the removal of block-funding, there may also be a need to supplement self-directed funding with direct funding to ensure the infrastructure component of service delivery can be guaranteed. We would propose that this infrastructure funding could be contestable among service providers in any given community/region on a periodic basis, but guaranteed for a number of years thereafter.

The proposed governance structure for the implementation of the NDIS is a National Disability Insurance Agency Board which will in turn receive advice from an Advisory Council. The advisory council must be made up of people with a diverse knowledge of disability issues (experts) to ensure that the information provided to the Board is accurate and "in touch" with information from the disability area. There should also be an obligation on the part of the Board to heed this expert advice. Assistive devices and services must be 'fit for purpose' - not just the cheapest and easiest option.

A clear and transparent complaints and disputes system must also be established. Merit-based, not just procedure-based, review of individual cases must be available. The introduction of a National Disability Ombudsmen, whose office would be completely independent of the NDIS, would give a genuinely independent arena in which to arbitrate complaints.

The current system of disability support and services is fragmented across all states in Australia. We commend the Productivity Commission for recognising this, proposing more consumer choice which allows a more holistic approach to disability; and, in turn, empowering a person with a sensory disability to make decisions for themselves. For our collective constituents, self-directed packaging must be the 'default' setting.

Any system of funding must also be fair, portable and consistent. It must remove the current silos and fragmentation of services, and end the 'confusopoly' - not just whole-of-governments, but also multi-agency - taking an 'holistic' approach. In addition, clear standards and entitlements will assist in ensuring equity.

Again, we commend the Productivity Commission on their valuable work to date on this critical issue.

Yours sincerely,

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***"It should not require such an extraordinary effort  
to live an ordinary life."***

*(Shut Out: the experience of people with disabilities and their families in Australia,  
National Disability Strategy Consultation Report, 2009)*