Vision Australia logo 
Blindness. Low vision. Opportunity. 

**Vision Australia Submission: Foundational Supports**

Submitted to: Department of Social Services

Date: 4 December 2024

Submission approved by: Chris Edwards, General Manager Corporate Affairs and Advocacy

## Introduction

Vision Australia welcomes the opportunity to provide this submission to the Department of Social Services, as part of its consultation to inform the design of Foundational Supports. Vision Australia acknowledges that there is an ongoing need in the disability community for supports additional to those provided by the NDIS, mainstream services and other Government bodies. We welcome the commitment of all Australian Governments to these reforms as they will play an important role in building the capacity of people with disability to ensure that they can participate fully in social, community and civic life.

## Recommendations

* There must be dedicated funding to enable specialist providers to develop and maintain tailored information resources for low incidence disability cohorts such as blindness and low vision.
* There is a need for funding to support ongoing delivery of capacity building programs.
* With appropriate funding in place, specialist providers could play an important role in building the capacity of mainstream providers and community organisations to be inclusive of people with disability.
* Many children with vision impairment will require increased access to short-term early intervention support outside the NDIS and this should be addressed through foundational supports.
* Clear referral pathways must be available to families. Parents often have limited knowledge of the types of services that are both necessary and available at their child’s point of diagnosis and they must be supported with referral processes that operate effectively across the health and disability sectors.
* Additional supports are needed to help families to understand and engage with local resources, particularly in regional and remote areas.
* Peer connection and mentoring programs for young people are difficult to administer in a NDIS context. They should be funded through the foundational supports framework in order to ensure that people with disability do not miss out on crucial opportunities to learn and build skills in less formal settings.

## Information, Advice and Referral Supports

The effective and efficient provision of information is an essential support for people who are blind or have low vision. This is particularly the case for people who have been recently diagnosed or who have experienced a sudden deterioration in their vision. Providers such as Vision Australia currently invest significant time and effort in supporting people who are blind or have low vision to establish links with disability related and community services. Examples of situations where this is required include services that go above and beyond what Vision Australia provides, such as assisting parents to find an appropriate preschool or playgroup, referrals for counselling or behavioural support, and other therapies that are outside of our expertise or remit. The majority of this work is unfunded, and it is consequently not always possible to provide people with disability and their families with the level of support that they need. Foundational support funding should be considered to enable providers to liaise with other organisations and make appropriate referrals as required.

Specialist providers such as Vision Australia also invest heavily in the creation of tools and resources to support information access for people who are blind or have low vision. These include online toolkits to support development of generalised compensatory strategies around vision loss, as well as guides to assist in accessing funding and other government programs. These resources provide a high level of value to the community with whom we work, however, they must be kept current and relevant, which proves challenging unless there is dedicated funding for this purpose. There is an ongoing need for specialist providers to support information access in this space, as generalised disability services rarely offer resources that is sufficiently tailored to meet the needs of low incidence cohorts such as blindness and low vision.

## Capacity Building Supports

Vision Australia cannot emphasise enough the ongoing importance of initiatives such as the former Information, Linkages and capacity building (ILC) Program. The ILC program is a crucial component of the overall disability services framework within Australia. Grants of this kind are important as they enable providers to trial and pilot service innovations that can benefit the sector more broadly. It is vital, however, that there is dedicated funding to support the ongoing delivery of capacity building programs. One limitation of the ILC model is that it has largely focused on delivery of short-term funding for periods of up to three years. This does not allow sufficient time to establish a program, evaluate its effectiveness and implement continuous improvement strategies. Nor does it facilitate continuity of support for people with disability, even where there is demonstrable evidence that programs are working well. Vision Australia proposes that longer-term funding for ongoing programs should be provided as a foundational support, with safeguards in place to allow for termination where evaluation indicates that delivery is not being carried out effectively.

Within the framework of foundational supports, there should also be funding streams to enable specialist providers to work with other mainstream services in order to build their capacity. This is particularly important for low incidence cohorts such as blindness and low vision, where specialist knowledge is often required to upskill local providers or other key influencers in a person’s life. Generalised ILC funding can sometimes be utilised to build the skills of local communities, however, we often find that the low incidence of vision impairment combined with the challenges of servicing regional and remote locations, means that it is more effective to provide this support at the time it’s needed and in the person’s natural setting. This provides the additional benefit of enabling family and supporters to be involved and educated throughout the process. Specific funding for this purpose through the foundational supports framework would allow for a multifaceted approach to capacity building within local communities.

## Early Childhood Supports

Vision Australia has a number of current clients who would benefit from increased access to short-term early intervention provided through foundational supports outside the NDIS. For example, we work with several children experiencing delayed visual maturation. These children are generally aged under 3, and often do not qualify for access to the NDIS because their vision is able to be corrected through contact lenses, removal of cataracts, and other treatment options. It is nonetheless important for us to work with these families so that they can understand how to provide the best possible environment to stimulate the child’s vision. A child’s vision will generally continue to develop until around 8 years of age, and the way in which they use it changes as they become more mobile and need to access visual information at greater distances. It is vital that they work with specialist providers such as Vision Australia, to ensure that level of vision and its use in daily routines is monitored and is continuing to develop. Similarly, there are many children who do not meet NDIS access because their visual acuity cannot be clearly established. In the case of very young children, it can be particularly difficult to determine the extent of vision loss until the child is able to communicate or begins to access environmental information beyond arm’s length.

Sometimes these children are later diagnosed with a permanent condition that qualifies for NDIS access, and sometimes they are not, but in either case their access to short-term early intervention services is crucial in ensuring that they meet development milestones. Regardless of whether children meet permanent disability, early intervention or development delay requirements to access the NDIS, there must be supports available to them until such time as the extent of their vision loss can be properly assessed and determined. Due to the impacts of vision impairment on all areas of development, it is essential that children are able to access services without delay. Access to foundational supports for this cohort must be supported by a clear pathway for families. Parents often have limited knowledge of the services available at their child’s point of diagnosis, and they need to be supported with a referral process that operates effectively across both the health and disability sectors.

It is also important to realise that families do not always know what aspirations they can or should have for their child, particularly where diagnosis of a condition is new and unfamiliar. Foundational supports should play a key role in enabling parents and families to develop an understanding that their child generally can be active and productive with the right supports in place. Some parents conduct their own research and are able to understand how to make systems work well for their child, whereas others have more limited capacity to do this. Dedicated funding to support family coaching and peer mentoring programs should be considered as part of the design of foundational supports. This would strengthen the ability of families to play an active role in setting goals for their child and develop compensatory strategies to offset future impacts of a child’s impairment. Currently, investment by providers in such programs is minimal, because there is no funding stream for this purpose. The NDIS support structure tends, by its nature, to prioritise individual capacity building for the participant. While service providers are cognisant of the benefits that capacity building and coaching can offer to families and supporters, organisations are not resourced to develop these programs without the financial assurance to run them. Activities such as camps or residential programs for children and young people can be particularly beneficial in facilitating peer connections, however, they are difficult to administer in an individualised, activity-based funding context, due to the complexity associated with involvement of multiple professionals and staff. The implementation of Foundational supports provides an opportunity to address this gap in holistic and family-centred service delivery and to ensure that young people do not miss out on the opportunity to learn and build skills in less formal settings.

We note that much of the current thinking around foundational supports for children has centred on group-based service delivery within existing early childhood education and care settings. We believe this would be operationally effective for disabilities where there is a significant prevalence within the community. For example, most schools would have a number of students who are neurodiverse. Children who are blind or have low vision represent a low incidence cohort, meaning that many mainstream therapeutic providers lack the capability and experience necessary to work with these children. Vision Australia considers that a more individualised and specialised approach will be required for the delivery of foundational supports to this cohort.

## Conclusion

Vision Australia thanks the department of Social Services for its consideration of this submission. We would be happy to provide additional information about any of the issues raised in this paper. We recognise that the implementation of foundational supports is both complex and extensive, and we look forward to additional opportunities for meaningful participation in future consultations on this topic.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision. 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 Felix Library for 0-7 year olds
* Employment services, including National Disability Employment Services
* 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. 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.

We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.