

Vision 2020 Australia response to Information, Linkages and Capacity Building (ILC) Policy Framework online consultation

1. Please tell us your name and organisation

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Established in October 2000, Vision 2020 Australia is part of VISION 2020: The Right to Sight, a global initiative of the World Health Organisation and the International Agency for the Prevention of Blindness. Vision 2020 Australia is the peak body for the eye health and vision care sector, representing over 50 member organisations involved in: local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support.

2. What are the most important elements of ILC?

Vision 2020 Australia has prioritised the five elements of the ILC in order of importance and discussed the most relevant components of the streams and how they can improve outcomes for people who are blind or have low vision.

- **Priority 1 - Individual Capacity Building (Stream 4)**

It is the position of Vision 2020 Australia that Stream 4, Individual Capacity Building, as per the Discussion Paper is too narrow. Eye health and vision care services are generally episodic by nature, such as orientation and mobility training and assistive technology provision, are already provided through IFP. Therefore, there is no need to duplicate funding for these services via the ILC.

It is the preference of Vision 2020 Australia that ILC services should cover services that are not able to be reasonably individualised, such as library services, assistive technology help desks and volunteer coordination. It is the remit of NDIA to ascertain which streams these services fit into within the framework.

- **Priority 2 - Community Awareness and capacity building (Stream 3)**

Vision 2020 Australia believes that there should be direct support for specialist disability organisations that carry significant costs of operating volunteer programs and services. Volunteer programs including peer support, personal and social activities contribute to social inclusion.

- **Priority 3 - Capacity building for mainstream services (Stream 2)**

In addition to local opportunities as mentioned (page 6) there should be support for national service providers to develop national strategies in partnership with key partners.

- **Priority 4 - Information, Linkages and Referrals (Stream 1)**

Vision 2020 Australia supports a centralised database of services, including the range, availability, performance and quality of services.

- **Priority 5 - Local area co-ordination (LAC) (Stream 5)**

Vision 2020 Australia supports the continued development of LACs capabilities and networks.

[National body working in partnership to prevent avoidable blindness and improve vision care](#)

3. What is missing?

Vision 2020 Australia believes the ILC Policy Framework would be significantly strengthened by inclusion of the following components:

- **Thin market**

Blindness is a low incidence disability, and this is exacerbated in regional and remote areas. The number of people with an IFP means that it is unlikely that organisations will be able to support adequate and appropriate skilled services in regional and remote areas. Thin markets will need ILC support to maintain service provision.

- **Specialist Service Provision**

This risk of service failure in thin markets is particularly significant for specialist blindness services. Vision 2020 Australia's member organisations possess specialist expertise which is often provided on a non-fee basis and at no gain to the organisations.

This expertise often provides support to individuals and their families at the time they acquire a condition associated with disability and assists individuals to better understand their condition, retain some semblance of control, maintain and develop support networks and avoid crisis, and ultimately reduce reliance on other services. This support is provided through information available through our website and helplines, staffed by experts; peer support networks; specialist libraries for equipment or accessible books, and a helpdesk for technological aids.

It is therefore Vision 2020 Australia's position that the ILC should specifically include consideration of how specialist disability is supported in the short to medium term. The complicated and various funding streams that part-support (or do not support at all) these services require clarification.

- **Volunteer Coordination**

Vision 2020 Australia notes with concern that the role of service providers in supporting volunteer programs does not appear to be included in the ILC. Volunteers in the eye health and vision care sector work across numerous areas - such as peer support networks, recreational events, fundraising, information access, and puppy caring. The value of these services is not only the support they provide, but also the way they create and nurture natural support relationships for people with disability and volunteers. The cost of volunteer coordination (suitability, screening, police and safety checks, education and training, communication resources) is currently part funded by a mixture of organisation spend, disability funding and aged care funding.

In future these extra costs may not be included in prices paid for individualised support, and are better met with targeted grants which should come through the ILC.

- **Support for people over the age of 65**

It remains a serious concern of members that people who are blind or vision impaired over the age of 65 continue to fall between the cracks between the aged care system and the NDIS. The sector is also increasingly concerned that as the NDIS gains momentum with the national rollout, that public messaging about the NDIS benefits to people with disability will also have an increasing negative impact on philanthropic giving.

Vision 2020 Australia therefore considers that ILC also take into consideration the support of appropriate services that are provided to all consumers regardless of their age.

4. How will we know the ILC streams are meeting their objectives/vision?

Vision 2020 Australia believes the NDIA should develop key targets and activities for the ILC streams. There is also merit in developing the publicly available resources and activities, including web information on the ILC streams, once there has been further consultation and agreement on the specific final design and activities which the ILC will undertake and deliver to.

The NDIA should also take a snapshot of the services which individuals with a disability are receiving now in order to compare with the services that they are receiving once NDIS is rolled out.

5. What would be the implementation challenges?

Vision 2020 Australia believes the significant challenges associated with the ILC streams can be overcome through a more conciliatory and partnership based approach between service providers and the NDIA.

1. Information, Linkages and Referrals

Ensuring that service providers can be compared equitably on a like for like basis, so that consumers and others are able to make informed decisions, test the claims, and allow providers to provide evidence of their claims.

2. Capacity building for mainstream services

The NDIA would benefit from mapping the work done to date across sectors, seeking input on the key issues in mainstream areas that people with a disability (and the organisations that support them such as Vision Australia) face in their daily lives, and to working with key partners to identify blockages, successes and drive further reforms and achievement.

3. Community awareness and capacity building

This stream will require support for activities that do more than build awareness (e.g. television advertisements), but that act to proactively break down barriers.

4. Individual capacity building

As noted above, stream 4 will be the most critical element of the framework to get right, and at present, appears to be narrowly constituted from a blindness and vision impairment perspective. The key challenge will be to truly provide adequate support to the sector, to support the range of services and supports accessed by people who are blind or vision impaired, which cannot be reasonably linked to an individual's IFP. That is, information and referral pathways, capacity building within mainstream community, awareness raising and coordination, are secondary to a foundation of specialist services being available-where are people being referred to if the service doesn't exist?

The concept of "individual capacity building", while certainly a key principle supported by Vision 2020 Australia, should not be understated by the delivery of ILC to mean only short term, one off, generalist or a transactional view of support which requires a direct outcome. Supports such as library services for people with a print disability, empower the capacity of certain individuals who are blind or vision impaired by the virtue of being included in the literary world of the community, in an otherwise exclusive society that locks them out.

Vision 2020 Australia considers there is significant opportunity within this stream to ensure services are adequately supported to respond to need. We support consideration of reducing red tape and reporting issues so that individuals and service providers may 'get to work' as efficiently and effectively as possible. We also consider there may be issues around the interface with aged care or people aged 65 years and older. It will be absolutely critical to ensure stream 4 and indeed ILC overall, meets the needs of people who are blind or vision impaired, that the NDIA continue to discuss developments in this area with specialist service providers, consumer groups and Vision 2020 Australia going forward.

5. Local area co-ordination (LAC)

Vision 2020 Australia considers that there should be a sufficient level of national support put in place to drive the overarching program and create efficiencies in building the overall capacity of the sector. Some data that will be released shortly indicates that the blindness and vision impairment sector is currently facing with an increasing intensity, challenges to meet the demand of the sector and increased workforce pressure, and Vision 2020 Australia considers that an industry development strategy will need to be developed to address this problem.

With this example, Vision 2020 Australia recommends that this stream be constituted to include this type of strategic activity.

6. Which aspects of a person's life do you think ILC could have the greatest impact on?

The ILC has the potential to significantly improve an individual's social inclusion by enabling economic and social participation and building capacity.

Investment in thin markets, over 65s, volunteers, access to information and support for assistive technology will help to prevent potential isolation.

7. What are some of the principles that should guide investment across ILC streams?

Vision 2020 Australia supports principles to guide investment across ILC including:

- Quality - utilise expert knowledge
- Accountability - public reporting of activities and outcomes
- Systemic issues - targeted, coordinated
- Use of contracts and tendering - guided by procurement policies
- Accessible - accessible procurement policies and processes

8. How do you see the interface between ILC functions and activities and the interaction with the mainstream service system? (Housing, education, employment, health, family, accessibility and transport)

Vision 2020 Australia supports the idea that the NDIA ILC functions and activities will help to build individual and community capacity and awareness and this will drive improvements in mainstream services consistent with Australia's international, national and state obligations. The success of this outcome for people who are blind or vision impaired will be dependent upon ensuring the whole range of supports and services of the holistic person are adequately supported through the ILC as noted in Vision 2020 Australia's comments here.

Vision 2020 Australia also notes that the NDIA has a role to support self-advocacy efforts, and advocates will help to reduce barriers for people with a disability in local communities.

Vision 2020 Australia believes that the NDIA must work in partnership with service providers with the expertise through a long and proud history of achievement for people with vision impairment and the population of people with disability.

9. Other comments (optional)

For further information please contact

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