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**Vision Australia Submission: A Draft Quality Framework for the Disability Services Program**

Submission to: Department of Social Services

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Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

# Introduction

Finding and maintaining a job is one of the significant and long-standing challenges facing Australians with a disability. For people who are blind or have low vision, this challenge has proved to be especially intractable, despite decades of government rhetoric, interventions and programs. The blind and low vision community continues to experience levels of unemployment and under-employment much higher than the average for people with a disability, and therefore many times higher than for the general community.

Beginning with our response to the Disability Royal Commission’s 2020 Issues Paper on employment, Vision Australia has put forward our view that there is no single, “magic bullet” policy lever, training program or government intervention that will ensure equal employment opportunities for people who are blind or have low vision. We strongly believe that pathways to meaningful employment for people who are blind or have low vision can only be created through the implementation of interconnected and coordinated strategies that are anchored in the family, developed in the school and tertiary education systems, embraced by employers, supported by governments, and embedded in society as a whole.

Through our various programs, such as Life Ready, Leap Up, and Graduate Employment, Vision Australia works with our clients and their families, as well as with employers and the community, to build job readiness, help reduce systemic barriers, create positive attitudes towards employing people who are blind or have low vision, and help people achieve their full potential through meaningful, rewarding and sustained employment outcomes.

Vision Australia also participates as a small provider in the Disability Employment Services (DES) program. We believe that a targeted and optimised DES program has an important role to play in expanding the choices that are available to people who are blind or have low vision when seeking employment. We are keen to constructively engage with issues and proposals, and to do as much as we can to ensure that the program operates for the maximum benefit of its users.

We believe that the consultation around the Draft Quality Framework for the DES program is an important opportunity to strengthen the program’s safeguards and operating model so that it remains effective into the future. We do, however, feel it is essential to emphasise the need for the quality framework underlying the DES program to recognise the diversity of providers that operate it, and the unique needs of various disability groups. As we will explain more fully in our comments below, while we think that there is much to like in the draft quality framework, we do have an overarching and significant concern that in its current form the framework pays insufficient attention to this diversity and uniqueness, and thereby runs the real risk of having a disproportionate negative impact on small DES providers such as Vision Australia and, ultimately, creating inefficiencies and increasing barriers to effective participation for providers and end-users alike.

# Comments on Discussion Questions

In our comments on the questions presented in the Discussion Paper we generally focus on the questions for each area taken as a whole, rather than commenting specifically on each subpoint in each question.

## A Risk-Based, Earned Autonomy Model

We strongly support the concept of a risk-based, earned autonomy model for the DES program, providing that is implemented with due regard to the specific environments in which individual providers operate, and providing also that it takes into account an organisation’s attainments in other areas of service provision. Where an organisation is demonstrating quality of service through compliance with standards such as those developed for NDIS providers, their evaluation burden should be reduced accordingly.

As a small DES provider, Vision Australia is alarmed at the prospect of being presented with additional compliance requirements in the absence of a clear linkage between measurement and quality and tangible benefits for clients. We certainly and strongly believe that people with a disability have a right to receive quality and needs-appropriate services from DES providers; however we stress the importance of targeting measures to the circumstances of various categories of providers, rather than adopting a scattergun approach and hoping that service quality will somehow improve.

We believe that existing processes within the DES program aimed at demonstrating quality, such as the various quality reviews and audits, provide considerable scope for fine-tuning, both to reduce requirements that really have little relation to quality outcomes, and enhancing those that do.

As examples of current measures that, in our view, do not add value to quality service delivery are the following:

* The requirement to update job plans every three months, even when a person is working independently and has minimal contact with the DES program post-placement;
* The requirement for every payslip to be validated by the client and the employer, even when the client is working independently with minimal post-placement contact with the DES program.

Requirements such as these are often perceived by clients as an undignified assault on their independence, and by employers as a burden that calls into question the efficiency and effectiveness of employing someone who is blind or has low vision. Of course, there may be some situations where such measures are justified, but for us as a small provider of DES services to people who are blind or have low vision, they are quite rare.

We suggest that consideration be given to incorporating flexibility into an earned autonomy model, for example, by increasing the period between job plan updates to six or nine months, and by streamlining other measures such as the collection of payslips. Whenever a new measure is introduced or an existing one modified, there must always be a demonstrable connection with achievement of quality outcomes for clients, having regard to the specific provider and the client group that is receiving services.

## Quality Element One: Participants’ Rights

In our view, participant surveys are not a useful tool in gathering data relevant to this quality element. Clients typically receive many surveys in the course of their interactions with various organisations and businesses, and “survey fatigue” is a real phenomenon that reduces people’s motivation to complete more surveys. There is no guarantee that clients will complete surveys related to the DES program, especially if they are working independently and actively engaged in the culture and activities of the workplace. If clients are receiving Jobseeker payments they may be even less likely to provide feedback to the provider so as not to jeopardise the ongoing relationship.

From our perspective as a small DES provider, participant surveys are also problematic. For example, it is not clear from the Discussion Paper what the potential impact on our quality rating would be if only a few of our small number of clients chose not to complete a participant survey. Moreover, we have no way of knowing what level of responses have been obtained, and so we cannot identify issues based on surveys alone.

As we have previously noted, it is important to recognise that different client groups have different needs and skills. If a person who is blind or has low vision is to engage with a participant survey, the survey must be designed in compliance with the Web Content Accessibility Guidelines, and the person must have sufficient assistive technology skills to interact with it. The Discussion Paper seems to assume that all clients will be able to complete a participant survey with equal amenity and convenience, but this is certainly not a valid assumption for our DES clients who are blind or have low vision.

In general, we believe that individualised participant interviews are a much more effective and reliable way of assessing whether people are getting the work that they want though the DES program. Such interviews already form part of the annual DES audits, and the incorporation of a (short) survey into the interview structure could be of benefit.

## Quality Element Two: Quality of Service

Decades of employment-related research, including research conducted by Vision Australia, has shown very clearly and consistently that a key – and perhaps the key – reason why the unemployment rate for people who are blind or has low vision is so high is because of negative stereotypes and biased, ill-informed attitudes on the part of employers. We are very concerned that imposing extra burdens on employers will exacerbate the problem rather than contributing to a quality solution. In any case, employers who already have a good relationship with a DES provider are unlikely to provide negative feedback – in other words, the absence of a response is not symptomatic of a failure in the provision of quality service. At the same time, it is not clear how a lack of response would affect our rating as a quality DES provider.

## Quality Element Three: Provider Capability and Governance

As a small DES provider, one of our chief concerns with the draft quality framework outlined in the Discussion Paper is its potential to add layers of unnecessary compliance to no good purpose. We, and other providers of a similar size, do not have dedicated DES compliance teams, and introducing superfluous compliance burdens reduces the time staff can spend assisting clients achieve their employment goals. We are not implying that compliance is unimportant or extraneous, but it is essential that the level of compliance requirements should not be so onerous as to subvert the fundamental aims of the DES program itself.

Vision Australia already completes various audits and other compliance activities as part of the range of services that we provide to clients, and the DES quality framework should adopt a holistic approach to compliance by combining and leveraging the compliance data that we are already producing. Unnecessary duplication or repetition adds no value to our services and does not benefit the clients who receive them.

## Quality Element Four: Feedback and Complaints

It is a truism that people usually provide feedback only if things are not going well, so using feedback as the sole or primary basis for assessing the quality of a service and identifying areas requiring improvement is likely to be extremely inaccurate. It is not clear from the Discussion Paper how complaints are categorised (for example, what criteria are used to determine if a complaint is “serious”), and how these categories would be used to work with or assess the provider.

A factor that affects the amount of feedback is how easy the data-collecting system is to use. At this stage we are not aware of how the accessibility of the complaints and feedback system would be optimised for people who are blind or have low vision, both in terms of compliance with accessibility standards and alignment with the technology skills that clients have.

Finally, it is important to note that as a provider of multiple services, Vision Australia regularly receives “mixed feedback”, where a client will combine a mixture of positive and negative feedback about different service into the one email, phone call or other interaction. It can be difficult to disentangle this mixed feedback when reporting on it, especially if it is provided incidentally during the course of another conversation.

## Quality Element Five: Formal Assurance

More information is needed about how breaches against the requirements of the Grant Agreement would be assessed and categorised, and how the number and nature of breaches would act as a factor in determining the quality rating of a service provider.

In connection with site visits, it is important to note that clients often find it stressful and inconvenient if an unknown and unexpected observer is present during their interactions with Vision Australia staff.

Such visits should be carefully structured so as to obtain useful information and cause minimal disruption to clients and staff. A collaborative and expectations-driven approach to arranging site visits will help ensure that they add value to the delivery and development of the service.

## Quality Ratings

Vision Australia is committed to the concept of quality ratings in the pursuit of quality employment outcomes for our DES clients. We want to emphasise that there is already an abundance of data that the Department receives from DES providers, and any additional data must be balanced against the administrative resources required to produce it. New measures should only be introduced when it can be demonstrated that existing ones are inadequate, and only when there is a readily-discernible connection between the measure and quality employment outcomes for clients. It is vital that oversight does not become overreach.

Our inclination is to have three rating categories, as a way of ensuring that there will be providers in each category. There is little value in having, say, a “high” category if providers are rarely if ever assigned to it, which is more likely to be the case if there are five categories – the ratings will cluster around categories 2-4 with a high vacancy rate in categories 1 and 5. In any case, providers should always be encouraged to exceed current ratings, and there should be incentives in terms of greater earned autonomy for doing so.

**About Vision Australia**

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. 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: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on 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 our 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.