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Blind Citizens Australia

November 2018

Have your say! Please see below, a discussion paper for Blind Citizens Australia’s Service Provider Expectations Policy consultation.

Read more to find out about the new policy and how you can help to shape it.

**About this policy**

Blind Citizens Australia (BCA) is the united voice of Australians who are blind or vision impaired. Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs. As a result of a recommendation adopted at the 2017 national convention, BCA's National Policy Council has been tasked with exploring what the last part of this mission means. We are conducting this consultation so that we can come up with a policy which clarifies this for both blindness service users and blindness service providers.

The National Policy Council (NPC) is an elected committee that makes recommendations to the board about the policy direction of BCA.

**Background**

Providers of specialised services for people who are blind or vision impaired play an integral role in the skill development, independence and safety of blind and vision impaired Australians.

We believe it is important to have a yardstick which people who are blind or vision impaired can use to measure the quality of services they receive.

Service Providers will have clarity on the views of service users. Service providers will also be able to measure the quality of the services they provide.

We hope this new Service Provider Expectations Policy can be used by individuals receiving or approaching blindness-specific services, irrespective of the specialised service provider involved. We have developed this document to outline the key issues that we believe are important to people who are blind or vision impaired, so that service users receive a consistent approach to service delivery, and are at the forefront of service provision and organisational decision-making.

Underpinning every aspect of this policy, will be the human rights, dignity, privacy and respect for each individual who is blind or vision impaired. In recent times, BCA has worked hard to establish working relationships with blindness service providers, and has entered into formalised partnership agreements with several of them, including Vision Australia and many of the Guide Dogs organisations. In this framework of mutual understanding and respect, we will encourage and offer to support blindness service providers to develop strategies to ensure that they can continue to provide quality services well into the future.

This Service Provider Expectations Policy will be developed with people who are blind or vision impaired who utilise a range of blindness-specific services. The policy will recognise the diversity in history and focus of service providers, to ensure it can be used by all blind and vision impaired Australians, wherever they live and in all contexts.

**Why now?**

The introduction of the National Disability Insurance Scheme, and the new My Aged Care system are designed to give individuals more choice and control over the services we access. This has been a steep learning curve for many of us. Ensuring continuity of support, while navigating a new system has presented a range of challenges.

We are also keenly aware that many people with disability are not eligible for disability-specific supports through the NDIS, due to being over 65 years old. Access to the aged care system does not automatically provide disability-specific supports, and members have told us that some specialised equipment and supports are not available through the entry-level aged care program for which they are eligible. Many services that people who are blind or vision impaired have accessed previously free, are no longer available to them through a government program. Some people who are blind or vision impaired may not access the NDIS, or My Aged Care. While BCA will continue to work with Governments to find a solution, we need to ensure that blind and vision impaired people do not miss out on these essential services and integral supports.

**What will the policy cover?**

BCA’s National Policy Council has identified the following broad topics to be covered in the Service Provider Expectations Policy:

- Governance and Leadership

- Employment and Staffing

- Client Representation

- Service Delivery

- Communications and Access to Information

- Feedback and Complaints

- Fundraising and Marketing

**What happens next and how can you be involved?**

The policy will be most useful and effective if it can represent the views of as broad a range of people who are blind or vision impaired as possible, from all over Australia and from many different circumstances. Please take the time to read the discussion paper, think about the questions and let us know what you think.

As with all of BCA’s policies, we will consult with people who are blind or vision impaired in the development of this policy, to ensure we capture the views of our constituency.  The finalised document will form part of BCA’s policy suite, be published on BCA’s website, and will be an active resource for both service providers and people who are blind and vision impaired alike.

The National Policy Council has done some preliminary work on the outline and fleshing out some of the topics that this policy could include. This version is by no means set in stone, and we encourage comment and suggestion to further develop this document.

Over the next few weeks, we are hoping that as many members as possible will read and reflect on this discussion paper. You will see that it includes a number of questions, which we will use as the focus of several teleconferences. We also encourage you to email your responses to [NPC@bca.org.au](mailto:NPC@bca.org.au) If you would prefer to talk to someone about your responses, please contact BCA on 1800 033 660, and ask to be put in touch with a member of the NPC.

We understand that some of you may have had negative experiences with a particular service provider. If this is the case, we encourage you to explore that provider's complaints mechanisms or to speak to BCA's Advocacy Officer for support in pursuing your grievance. This consultation will not be a way of resolving any such issues, but please think about any underlying problems with the system which may have led to your difficulties and how our new policy could change that system.

All responses and meeting notes will be collated and used as the basis for our Blindness Service Provider Expectations policy. We are hopeful of having something to present to our membership at BCA’s National Convention in Hobart in late March 2019.

This policy has the potential to change the relationship between service users and providers, enabling BCA and our members to speak confidently and consistently about what we want.

**Expectations of Blindness Service Providers**

Glossary:

In this document, these words have these meanings:

Blind person: includes any person who is legally blind or has a vision impairment or who seeks a service from an organisation because their disability is or includes loss of vision.

Blindness: includes vision impairment or low vision.

Blindness Service Provider: means any organisation whose main focus is providing services to blind people or which portrays itself to the public as being in existence to assist people who are blind or vision impaired.

Service user: means any person who wishes to become, is or has been a user of a blindness service.

Service delivery

1. People who are blind or vision impaired have specific needs for assistance, training and services if they are to fully participate as citizens in their communities. While people who are blind or vision impaired can and increasingly do access mainstream and multi-disability services, BCA believes that specialist blindness service providers have the best knowledge, experience and training to most appropriately meet the needs of people who are blind or vision impaired and assist them to achieve their aspirations.
2. Service guarantee: Blindness service providers exist to meet the needs of people who are blind or vision impaired that relate to their blindness and to help them achieve their aspirations, whatever their circumstances.  They collect money from the public and accept government grants on this basis. Some people who are blind or vision impaired now have access to a range of funding programs. Not all people who are blind or vision impaired are eligible for a form of government payment and there are often significant delays in obtaining or maintaining access to these programs.  Many funding packages do not adequately address the disability specific needs of service users. BCA asserts that blindness service providers should guarantee to provide essential blindness services to people who are blind or vision impaired, irrespective of their eligibility for funding. Library services, orientation and mobility and access to and training with a dog guide must be provided to any person who is blind or vision impaired who needs these services.  No service is to be predicated on a service user's willingness or ability to donate or to become involved in the organisation's publicity.

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| Q.: Should there be a service guarantee and what services should it include?  Q.: What obligation should there be on service users to contribute the funding they have? |

1. Timeline: It is reasonable to expect that a person inquiring about or enrolling for a service be given a realistic estimate of the time they will need to wait for any assessment, report or commencement of service.  Service users should know when they can expect their service to start and be informed of any significant alterations to this timeframe.
2. Service users should be able to choose where, when and what services they receive and are to be informed of the implications for any funding on the decision whether to travel to a service or receive it at home or elsewhere.
3. Service agreements: It is recommended that sample service agreements be published in a range of accessible formats, including indications of the elements that can be varied. Service agreements should be flexible to meet individual needs and circumstances. Service agreements are to be designed to take into account a service user's health and any other disabilities, cultural background, lived experience, living arrangements and roles within the community. Where individual characteristics cannot be accommodated, this needs to be clearly explained to the service user. An individualised service agreement must be provided to the service user, in their preferred format, before or at the time of signing. Service agreements should clearly state what costs, if any, will be incurred and how and when they are to be paid.

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| Q.: Are there other things that service agreements should cover or cater for? |

1. Pricing: The costs of services and products should be publicised.

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| Q.: Should there be a ceiling on costs? In many places, there is only one service provider, so market forces cannot operate to keep costs down and disparities among service providers and geographic areas have been reported. |

1. Interactions with service users: It is best practice that any employee of a service provider who interacts with a service user introduce themselves and explain their role. When working with a service user, they should clearly explain what they are doing and why. If they record a session or take photos, they are obliged to state that they are doing this, and for what purpose; the service user has the right to ask them to desist.

Communications and access to information

1. Service users have a right to access all communications produced by a blindness service provider, including websites, newsletters, forms, service information, complaints procedures, governance and nomination processes in accessible formats. Digital resources should be easy to navigate independently and accessible via a range of devices. Documents relating to an individual service user should be provided to the individual in their preferred format.
2. It is a requirement that all video material produced by service providers be audio described.

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| Q.: Are there other requirements for communications? |

Complaints procedures

1. Service providers must inform all service users about and publicise their complaint procedures in accessible formats. When a service user makes a complaint, its receipt is to be immediately acknowledged and they should be told who is handling the complaint and when to expect an outcome.

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| Q. Are there specific obstacles to lodging a complaint or having it resolved? |

Fundraising, Marketing and Publicity

1. Fundraising is integral to the operation of any blindness service provider, whether by seeking individual donations or by approaching corporate and philanthropic donors. Fundraising plays a dual role of raising money and educating the public. All fundraising, marketing and publicity material must promote people who are blind or vision impaired as valuable contributors to society. There is an obligation to demonstrate how the service provided will empower people who are blind or vision impaired to exercise our human rights, by emphasising our dignity, re-ablement, independence and diversity. This portrayal should be consistent across all such activities. It is essential that all staff and volunteers involved in such activities be trained to recognise how they impact public attitudes to blindness.
2. Blindness service providers must adhere to the Fundraising Institute of Australia's principles, in particular to Section 5.1. :

"5.1 Fundraisers must not threaten the dignity and privacy of a Beneficiary of an Organisation. For the purposes of this section a threat to the dignity and privacy of a Beneficiary includes, but is not limited to:

a) a Fundraiser passing a comment unnecessarily or negatively on the impairment, dependency or disability of a Beneficiary;

b) a Fundraiser using language which suggests that the client is to be pitied or feared;

c) a Fundraiser using children on Promotional Materials to raise funds for adult services, giving the impression that the clients are childlike;

d) a Fundraiser stating or implying a falsehood regarding a Beneficiary; and

e) a Fundraiser depicting a Beneficiary’s image or identity in Promotional Materials without that Beneficiary’s written permission."

1. Blindness service providers should encourage corporate donors to work towards ensuring that their products and services are accessible to service users.

1. Information which could be used to identify a service user, such as names, photographic images and stories, can only be used by a blindness service provider with that service user's genuine, informed and freely given consent. Service users must be informed about the existence of any identifying material relating to them, their right to say no and that they can continue to receive services if they do.

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| Q.: How far can we go in directing fundraising activities, given that this is the major way that organisations express their uniqueness from others? |

Employing people who are blind or vision impaired:

1. Where a person who is blind or vision impaired is qualified for a position and meets the selection criteria, preference is to be given to employing that person.
2. Organisations should adopt and advertise targets and timelines for percentages of blind staff in service delivery and management positions.
3. All premises, digital resources (whether designed or acquired) databases and social activities intended for staff are required to be accessible to people who are blind or vision impaired, whether currently employed or not, so that there is no barrier to their future employment.
4. Staff who are blind or vision impaired are to be encouraged to pursue opportunities for career development and promotion within the organisation.

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| Q. Could the policy state that the lived experience of blindness or vision impairment is potentially an asset for a service provider organisation shaping its culture and quality of service? |

Governance and leadership:

1. Blindness service providers are required to comply with all applicable laws in relation to governance. Those regulated by the Corporations Law must be governed by boards of directors, who must act in the best interests of their company. Boards need to encompass a range of expertise, such as law, accounting and service delivery. BCA asserts that, among the range of expertise required for an effective Board, lived experience of blindness and/or vision impairment is essential.
2. At least one third of directors or members of a management committee should have lived experience of blindness or vision impairment. People who are blind or vision impaired must be encouraged, trained and supported to nominate for the Board and other committees of blindness service providers.
3. It is imperative that Directors and committee members who are blind or vision impaired be resourced and supported to communicate with service users.
4. Board and committee materials are to be provided to Directors and members in their preferred formats and all meeting venues and Board activities are required to be accessible to people who are blind or vision impaired.
5. Board and committee members who do not have lived experience of blindness are to be provided with an induction which informs them about the lives of a diverse range of people who are blind or vision impaired.
6. Service Users must be able and encouraged to become members of blindness service providers so that they can elect governing bodies. Election material should be available in a range of formats.

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| Q.: How do we best ensure that governing bodies are influenced by people who are blind or vision impaired and that Directors who are blind or vision impaired can be effective in their roles? |

Q.: Should a percentage of directors be totally blind?

Service User representation and Advisory bodies

1. Blindness service providers must have and maintain effective systems which enable service users to influence their operations and the way services are delivered.
2. It is essential that blindness service providers ensure that they receive input from a range of service users, which represent the diversity of people who are blind or vision impaired, including people with additional disabilities, Aboriginal and Torres Strait Islander people, people from diverse cultural backgrounds and people at different stages of life.
3. Advisory bodies need not be elected, but where service users are appointed to them via other mechanisms, selection criteria must be transparent and available and a range of service users should be encouraged to nominate. It should be clear whether service users are appointed in their own right or as representatives and where they are representatives, they are to be resourced to communicate with their constituencies.
4. Where advice is given by an advisory body, there needs to be a clear pathway for responses to that advice and governing bodies should be accountable for responding to it in a timely and efficient manner
5. Advisory bodies should meet regularly and need to be able to consider matters referred to them by governing bodies or by service users.

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| Q.: How do we best ensure that advisory bodies play a meaningful role in influencing blindness service providers? |
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Thank you for your interest in contributing to BCA’s Service Provider Expectations Policy. You can contribute by:

* Emailing your feedback to [NPC@bca.org.au](mailto:NPC@bca.org.au)
* Calling BCA on 1800 033 660 to be put in touch with a member of the NPC
* Attend teleconferences that the NPC is hosting. Teleconference details can be accessed through the website at [www.bca.org.au](http://www.bca.org.au) or by calling BCA.
* Spaces in the teleconferences are limited – please book your place as soon as possible.
* All feedback must be received by Friday 21st December 2018