

Ph 1800 033 660 | E [bca@bca.org.au](mailto:bca@bca.org.au) | W [bca.org.au](http://www.bca.org.au/) | ABN 90 006 985 226

November 2020

# Blind Citizens Australia

# Response To Member Concerns – NDIS And Thin Markets

## Background

On August 27 2020, BCA held a roundtable in response to member concerns, regarding thin markets as they relate to the National Disability Insurance Scheme (NDIS), and My Aged Care (MAC).

Thin markets are described as inadequate service availability resulting in participants’ needs not being met. Thin market categories being considered include:

* Geographically rural/remote areas
* Support type (e.g. specialised supports with insufficient supply or low demand)
* Supports for people with complex needs such as (but not limited to) early childhood, behaviour intervention, specialist disability accommodation
* Support for Aboriginal and Torres Strait Island participants
* Support for Culturally and Linguistically Diverse (CALD) participants.

Members had discussed the difficulties they encountered in having assessments undertaken which would allow them to be considered for adaptive technology and other services, and day-to-day home and community supports. There are inconsistencies in the services and supports that are approved.

Thin markets are particularly an issue which impacts on people who live in regional and rural areas, but can also be a problem for people who are blind or vision impaired in urban areas. Blindness and vision impairment are considered to be low incidence disabilities. Hence, there are a very limited number of services which have specialist knowledge pertaining to blindness and vision impairment. Having assessments conducted in specific areas, or obtaining day-to-day support from agencies whose staff are knowledgeable in the area of blindness and vision impairment, can therefore be problematic for some members.

This paper will outline BCA’s response to member concerns, and articulate strategies for overcoming the challenge of thin markets, as well as the limitations which BCA faces as a peak body in addressing this matter.

## What BCA Is Doing

BCA meets regularly with senior NDIS and MAC officials to highlight the issues brought to our attention by members. As a peak advocacy body, BCA is invited to NDIA CEO forums, meets with senior staff at NDIA, and meetings with Department of Social Services. At these meetings, we bring forward areas of concern as identified through our advocacy service, and other feedback from members and service provider organisations.

BCA was also involved in the development of fact sheets, videos and resources for the NDIS, designed as compulsory training for planners and local area coordinators.

BCA also contributes to reviews and enquiries on areas of relevance to people who are blind or vision impaired. These submissions are available on BCA’s website.

BCA also works closely with Vision 2020 Australia, the national peak body for the eye health and vision care sector, representing around 50 member organisations involved in local and global eye care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance and community support.

We contribute to Vision 2020 Australia’s submissions and position statements.

It is acknowledged that members may not be finding BCA’s representation to be producing immediate and tangible improvements in the availability of blindness and vision impairment specific services. However, advocating to change or improve policies, and to educate decision-makers about the impacts on members’ lives which are created by service gaps, can take a great deal of time. While this is often the case, it is imperative that BCA continues to advocate on these matters, by continually raising them through the mechanisms available to peak bodies. BCA actively maintains connections with key personnel in the government departments responsible for the management of the NDIS and MAC. It is these ongoing relationships that will eventually lead to improvement in the overall situation for members.

Members themselves play a critical role in informing our communications with government departments. Without members raising concerns directly with BCA staff, we cannot be assured that we are accurately representing the concerns of members. Hence, member engagement is a critical part of BCA’s function, both internally, but also as a truly representative peak body.

## What Members Can Do To Overcome The Challenge Of Thin Markets

### Direct Support and Senior Staff from Service Providers

While there may not be service providers in one’s local area which are specifically knowledgeable in the area of blindness or vision impairment, most support workers have completed a certificate 3 in disability studies. As such, service provider staff should generally be familiar with broader concepts, such as person centred practice, and least restrictive alternative (LRA) practices. For members to receive the highest quality support possible from their local service provider, it is suggested that the most effective strategy for addressing the potential gaps in knowledge around blindness and vision impairment, is to form a positive and ongoing relationship with staff of these service providers. This includes team leaders or coordinators, whom one first would come into contact with when requesting support and establishing service agreements. A discussion should take place regarding the traits and strengths one is seeking in a support worker, and what skills or knowledge these workers need to have to work effectively with you. The relationship principle should be applied to one’s communication with direct support staff. It should not be assumed that staff will automatically know what your needs will be. It will be necessary to express these needs to support workers. For example, “I will need sighted guide when in an unfamiliar environment. This is how sighted guide should be done”. “I will need you to read to me the labels on specific products when we are shopping, so that I can make a decision about which product will best suit my needs”. Taking a proactive approach to informing one’s support workers of these types of requirements is going to maximise the chances that an NDIS or MAC participant will receive service which is of a high standard, and minimise any misunderstandings which might occur.

A blindness service provider may be able to provide resources or training to support workers who don’t have experience in working with people who are blind or vision impaired.

### Assessments

When an assessment is required, it is naturally optimal for an assessor to be knowledgeable in the area of blindness and vision impairment. However, this cannot always occur. In such cases, members are able to negotiate with the nearest service provider to their area to arrange for a visit, which may cost extra money. Alternatively, members may choose to advise a generic assessor to consult with a specialist provider, such as Vision Australia or Visibility, to ensure that assessments are as accurate as possible. Some members may have enough knowledge themselves to inform assessors of the factors which need to be considered. If not, members could consult a service provider knowledgeable in these areas by phone, or consult their peers through forums such as vision impairment related email lists or Facebook groups. While many people may not have the requisite qualifications in an area of expertise, their lived experience and knowledge can nonetheless be of great assistance when seeking advice or information which pertains to specific assessments.

## Limitations

BCA is unable to influence the decisions of service providers and assessors regarding where they choose to establish services. One negative impact of the NDIS, is that from the perspective of service providers, the model has become “for profit”. This decision was made in establishing the current model of service delivery in an attempt to make service providers more competitive, and with the intention of improving the quality of services available. It therefore follows, that if a service provider does not believe that their presence in an area where demand is low is sustainable, they will not establish themselves in such areas.

Similarly, BCA cannot influence decisions made by direct support staff as to where they choose to live. Support staff are free to work for whomever they choose, and like any other Australian resident, are free to move to whichever region they choose. There are no government incentive schemes available at present to encourage either services or support staff to establish themselves and reside in regional and rural areas, or where demand for services is relatively low. Due to these limitations and lack of services, many people who are blind or vision impaired, and families of young children with disabilities generally, have chosen to move to more populated areas where services are more readily available. Australia is a geographically large and diverse country. It is therefore impossible for a guarantee to be made of adequate and appropriate services to be present in every region, without significant government subsidies and incentive based schemes.

Research is underway to determine the best approach to addressing the challenge of thin markets by federal and state governments, and regulatory bodies. However, a paper published by the Thin Markets Stewarding Research Team, has identified that a new framework for defining and identifying thin markets needs to be adopted if the challenges created by thin markets are to be overcome in a sustainable and consistent manner (<https://www.themandarin.com.au/wp-content/uploads/2019/12/Market-capacity-framework-CSI.pdf>)

Legislation is also required to create opportunities for overcoming the challenges of thin markets also. The Thin Markets Stewarding Research Team’s paper states that the traditional way in which markets are perceived and analysed is not appropriate within the context of the NDIS, because thee marketplace is designed by government and other stakeholders, to fulfill quite different purposes to those which purely economically based markets are formed. Initiatives such as subsidising of service providers by governments for example, need to have underpinning legislation to enable that subsidisation. While BCA can and does advocate for appropriate legislation, without its existence, thin markets cannot be eradicated altogether, or addressed adequately and consistently.

## Conclusion

There is no doubt that significant challenges are, and will continue to be, present regarding thin markets, and the impact that this situation has on people who are blind or vision impaired living in areas of Australia where demand is relatively low for specialist services. However, there are strategies which BCA’s members can adopt to address these challenges, including the hire of private support workers if this is appropriate to meet one’s needs. BCA actively raises the impacts of thin markets with relevant government departments and agencies, and does so over time and in a consistent manner. There are issues over which BCA has no control, but this does not mean that these issues are not raised with key personnel in relevant departments, and by the disability sector as a whole.