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More Effective Social Services Inquiry  
New Zealand Productivity Commission  
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**Wellington 6143**

**Blind Citizens NZ**

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## **Submission in response to More Effective Social Services Issues - Draft Report**

### **Introduction**

The Association of Blind Citizens of New Zealand Inc (Blind Citizens NZ) is grateful to have this opportunity to comment on the More Effective Social Services Draft Report.

Blind Citizens NZ is a disabled person's organisation (DPO) whose members who are blind, vision impaired, deafblind or have low vision. A DPO is an organisation that:

- is governed and led by disabled people;
- focuses on representing the lived experience of disability in one or more impairment areas i.e. blind and vision impaired; and
- have members who are disabled.

DPOs contrast with other organisations in the disability (not-for-profit) sector which predominantly provide disability-specific services and/or are led by non-disabled people.

We observe there is minimal reference to disabled people in the draft report. Yet:

- one in four people living in New Zealand have lived experience of disability;
- our population is living longer;
- whether born or having acquired a disability at some stage in one's life, a disabled person will experience their disability for their lifetime;
- disability can be age-related;
- disabled people are users of services.

Following on from the six points just raised, Blind Citizens NZ believes it is of paramount importance for this report to recognise that unlike service users whose sickness or temporary impairment may be met through a short to medium term solution, a blind person reliant on blindness specific services, is unable to randomly change services to shape their life in the same way that someone else may be able to. For the next day, and the day after that, a disabled person will still be disabled!



It is imperative therefore, that for blind people, expert knowledge and professionalism is available when assistance with decision-making and service options are identified. For whatever options are conveyed, at least for blind people, are likely to be limited and will influence their lives for the long-term.

## **Our Feedback to the Draft Report**

Overall, Blind Citizens NZ is pleased with the draft report and the insight the Productivity Commission has shown in identifying the issues that face the social services system in general and what needs to change.

We believe the extent to which desired improvements can be achieved will be contingent on the “institutional architecture”. The report highlights and Blind Citizens NZ agrees that “a one-size-fits-all architecture across social services is not a viable proposition”, and that “a crucial consideration in choosing *who* is which party has the authority, information, capability and incentives to make and implement decisions that maximise social returns”, is paramount in the success of any new social services systems.

Mindful that decentralisation should improve on top-down control where delegated decision makers have better information and incentives to maximise overall social returns, Blind Citizens NZ recommends that the Commission consider reflecting in the final report, that social returns must include the recognition of the huge amount of transferable skills exhibited within the disabled community and not further perpetuation of free consultation from service users in support of service providers.

Blind Citizens NZ supports the notion of clients being able to choose a “bundle”, however clarity about how flexible these bundles will be, is needed.

Where reference is made to utilising certain business models, only those that align with evolving a healthy social model, mirror the principles of the United Nations Convention on the Rights of Persons with Disabilities (and other rights-based conventions), thus striving towards the removal of barriers faced by disabled people for example, should be considered.

## **Empowering Clients and Giving them more Choice**

Blind Citizens NZ notes that the Commission’s observation that “commissioning organisations need to consider carefully the service model best suited to the characteristics of their intended clients and the services in question.

While endeavouring to keep the following statement in context, Blind Citizens NZ requires assurances that the rights of clients are paramount. We refer to the following (refer page 18): “Shifting the power balance from the organisations that commission and deliver social services to clients would achieve better outcomes. For this to occur, client choices need to influence the allocation of public money to providers.

Government departments must let go of the reins of central control to allow the necessary power shift. Client choice is not an appropriate model for some services. These include services involving the coercive power of the state and where people experiencing psychological trauma or acute physical trauma receive services. Where choice *is* appropriate, government agencies need to invest time and resources into designing and implementing mechanisms that will enable choice to operate effectively. In particular, clients must be able to make informed choices, and government agencies must give providers the flexibility to meet the diverse needs of clients.”

A piece of work occurring in conjunction with the Disability Action Plan 2014-2018, supportive decision making (supplanting substituted decision making) is occurring. We recommend the Commission to familiarise itself with this specific piece of work for it will impact on how social services agencies work with clients.

## **Chapter 9 – Investment and Insurance Approach**

Our observation is that the overriding objective of the Commission appears to favour the investment approach, supporting early intervention on the basis that this will save money in the long run and, that it will improve the wellbeing of people who use social services. What drives this approach we believe will be government’s attempt to achieve more services, or a more even spread of services, with the same or less amount of resource.

The report suggests an investment approach will lead to the government focussing on those with the greatest needs for support. Blind Citizens NZ is aware those with the greatest needs for support are likely to have the highest future welfare liability. We are mindful that the Ministry of Social Development has, for a few years now, been using an investment approach based on the future welfare liability. There is however, little evidence we believe, to suggest this has benefited those with the greatest needs.

We question whether in reality, Government will make investment decisions based on which groups have the highest future welfare liability. In the private sector, investors assess risk. Blind Citizens NZ is clear that Government too, will also make assessments including about the chance of more support being required to actually get people into work. Disabled people however, face complicated social and environmental barriers, including employer attitudes, and a lack of accessible buildings and transport. Removing these barriers will take time and there is no guarantee of success. More importantly, if Government is of the belief that investment is unlikely to affect the future welfare liability of a group with the highest needs, there is a risk they will under-invest or not invest at all. In practice, an investment approach based on future welfare liability may further disadvantage those with the greatest needs including disabled job-seekers. There is evidence to support that long-term under-funding has undesirable consequences.

Thus, any investment approach based on future welfare liability may also reinforce the negative assumptions and prejudices in officials and politicians about which people are worth investing in. This goes heavily against a rights based approach, the social model of disability and the widely held views on equality of opportunity.

If government social services agencies will be expected to institute change, we believe they will be required to work a whole lot smarter than they do at present. Given the scarceness of resource, we ask how much of this will be used to implement change and whether government social services agencies are capable of raising their game.

## **Chapter 11 – Client (Customer) Choice and Empowerment**

The Commission recognises the importance of empowering clients and giving them more choice. In order to have choice, there must be more than just one option and, it remains unclear whether clients will always actually have a “choice”. When considering the availability of disability-related services and those required by people who are blind, vision impaired, deafblind, or have low vision, there are times when there is only one choice – whether it is a good service or not, on these occasions, there is no choice. There is no hard information, on how the empowerment of clients and giving them more choice should best be achieved, apart from through some form of consultation. Blind Citizens NZ recommends that the Commission includes in its final report, the need for DPOs at the very least, to be involved in whatever consultation takes place.

The following recommendation “When commissioning services, the Government should look to empower clients where such empowerment would not be detrimental to the client or the broader interests of society” is supported by Blind Citizens NZ. We note and support also the areas the Commission believes the empowerment of clients may best be achieved i.e. “Disability support services, home-based support of older people, respite services, family services, and drug and rehabilitation services are good prospects.”

In the steps that will be taken towards empowering clients, it will be paramount to ensure that they have the required information, incentive and capability to make decisions consistent with efficient and effective social services. When considering the availability of information, the diverse needs of clients and their respective informational requirements must be recognised i.e. for blind, vision impaired deafblind and low vision clients, there must be provision for communications to meet their diverse needs. This requires at a very minimum (and these examples are by no means exhaustive), the availability of large print, audio, braille, accessible electronic documents, sign language and websites that are accessible for everyone.

Blind Citizens NZ is mindful that changes will be trialled prior to implementation. Clearly this will be a lengthy process i.e. there is no quick and easy fix to devise a new system that will accommodate the variety and complexity of the needs of all the people the Commission intends will be served.

### **Establishing an Office of Social Services**

Blind Citizens NZ is cautiously optimistic about the value of establishing yet another “office” within Government. However we also recognise that if change is to be successful that this may require the establishment of an Office of Social Services to oversee change.

Noting that one of the aims would be: “To focus the effort of its agencies and to support ministers, the Government should establish an “Office of Social Services” within the government central agencies. The Office would need clear terms of reference that steer it towards favouring a strong customer focus.”

The Office of Social Services would then oversee key areas as outlined in the “Implementing Change” section including for example the collection of data, of which there is a shortage. While focusing on data and the significance of this, the collection of data also needs to consider that while we might for example know who are unemployed, data does not tell us why people are unemployed and, it needs to.

Then, with the proposal to devolve decision-making, we see the role of the “office” ensuring there is not a drop in standards in areas such as accessibility i.e. we believe Government has standards around access, which present challenges at times.

We commented early in our submission on the need to ensure there is not a drain on existing resources when changes to social services are implemented. The avoidance of over-spends in areas of administration should for example, be a focus in the new devolution of services.

In the event an opportunity to speak to and, elaborate on the extent of feedback provided in our submission is available, we would welcome this. Contact in relation to this submission should be directed to the Executive Officer Rose Wilkinson:

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With kindest regards

Rose Wilkinson  
Executive Officer

## **About Blind Citizens NZ**

Founded in 1945, the Association of Blind Citizens of New Zealand Inc (Blind Citizens NZ) is New Zealand's leading blindness consumer organisation and one of the country's largest organisations of disabled consumers. Blind Citizens NZ's aim is to heighten awareness of the rights of blind and vision impaired people and to remove the barriers that impact upon their ability to live in an accessible, equitable and inclusive society.