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Committee Secretary
Joint Standing Committee on the National Disability Insurance Scheme
PO Box 6100
Parliament House
Canberra ACT 2600
Submitted online: www.aph.gov.au

The provision of hearing services under the National Disability Insurance Scheme (NDIS)

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind. FECCA continues to work with organisations that advocate for people with disabilities from CALD backgrounds, including the National Ethnic Disability Alliance (NEDA).

FECCA welcomes the opportunity to provide input into the provision of hearing services under the National Disability Insurance Scheme (NDIS). We also acknowledge that some members of the deaf and hard of hearing community self-identify as coming from a CALD background.¹ This submission seeks to represent people who were born in non-English speaking countries, people whose parents were born in non-English speaking countries, people who speak English as their second or third language, and people who identify as coming from a CALD background based on their ethnicity, religion or ancestry and are deaf or hard of hearing.

Eligibility criteria for determining access needs of deaf and hard of hearing people under the NDIS

People from CALD backgrounds tend to underreport their conditions or disabilities due to a multitude of reasons including shame and stigma in relation to disability, limited language

¹ Deaf Australia, *Submission to the inquiry into Hearing Health and Wellbeing of Australia*, 2017, p.15

skills, lack of awareness about disabilities or the services available in Australia. These cultural and linguistic factors should be considered when administering assessments to screen people to ascertain their eligibility for the NDIS.

Language acquisition plays a vital role in the development of children. Researchers have revealed that some professionals encounter difficulties in accurately identifying hearing and speech-pathology related issues among multicultural/multilingual children.² This coupled with limited choices of language for intervention and lack of access to culturally appropriate and culturally sensitive assessment tools may result in under or over referral of children from CALD backgrounds for disability related services.³ Under-diagnosis of hearing related issues may result in people losing out on the NDIS and other related services. Thus, eligibility criteria must also consider these additional factors around diagnosis when screening people from CALD backgrounds for the NDIS.

Auslan is not a universal sign language⁴ and people who learnt sign language in other countries may need additional supports to learn Auslan. FECCA is pleased to note that both deaf and hard of hearing people and their family can receive funding under the NDIS to learn Auslan.⁵ These supports are important for people with deaf or hard of hearing family members, especially newly arrived migrants.

Accessibility and choice of hearing services

The NDIS can provide the necessary supports for an individual to have the opportunity to engage with the community, be independent and reach their potential through an individually tailored and self-directed funding program. Deaf and hard of hearing people from CALD backgrounds should have the choice to receive supports from professionals who understand the community languages and the cultures.

FECCA has continuously highlighted the need for consistency in provision of interpreting and translation services under the NDIS. Currently, interpreter and translation services for the NDIS participants are provided under 'consumables'. However, there is little clarity as to whether these funded services provided via Translation and Interpreter services (TIS National) will continue after the the initial planning and support coordination. This is especially disadvantageous to those who need dual interpreters (spoken and sign language).

The National Auslan Booking and Payment System (NABS) funded by Department of Social Services - in part – will be transitioned into the NDIS by 2019-20. The NDIS provides funding support for participants with hearing loss and use of Auslan to access interpreting

² Sarah Verdon, Sharynne Mcloed and Simon McDonald, A geographical analysis of speech-language pathology services to support multilingual children, *International Journal of Speech-Language Pathology*, 2014, 16 (3): 304-316.

³ Ibid

⁴ Trevor Johnston and Adam Schembri, *Australian Sign Language: an Introduction to sign language linguistics*, 2007, p.17.

⁵ Information provided to FECCA by Deaf Australia.

and translation services in activities of daily life'.⁶ However, there are concerns in relation to the cost of making medical appointments. The NDIS website states that:

People can continue to use the NABS until their NDIS plan is in place. The NABS remains funded to deliver a full range of Auslan interpreting services at medical appointments until clients move into the NDIS. *The NDIA is working hard to ensure NDIS plans include appropriate allocations for interpreting and translation supports [emphasis added].*⁷

It is difficult to pre-empt the number of times an individual may need to access language services, especially for medical appointments and the costs associated with the use of such services. The language used by the Agency '*NDIA is working hard to ensure...*' is vague and open for different interpretations. Thus, there must be clear policies and/or guidelines in relation to provision of interpreting and translation services and the cost of these communication services must not come out of individual packages.

The choices under the NDIS, or lack thereof, with regard to qualified and experienced staff to provide services to people from CALD backgrounds living in remote parts of the country is also a major concern for many CALD community members.⁸

As the NDIS is a new way of service provision, most of the participants and their family members are not aware of the supports that they can obtain under a package. Access to culturally appropriate advocacy services will ensure that individuals receive a range of supports that meet their needs. For example, in one case study: a young person was able to build the cost of Auslan interpreters to participate in soccer practice with the help of an independent advocate, as it was considered 'reasonable and necessary' for that person to participate in community life.⁹

There are some other good practice examples in the sector that can be applied across NDIS related services to enhance choice and control. For instance the National Relay Service (NRS) website includes a section on its website titled 'Aboriginal and Torres Strait Islander peoples and the NRS' which provides information in relation to NRS, accessibility, mobile applications and videos.¹⁰ Considering the importance of engaging people from non-English speaking backgrounds and the similarity of access and equity issues faced by CALD communities and Aboriginal and Torres Strait Islander peoples, FECCA recommends adopting a similar approach for people from CALD backgrounds with a dedicated section where information is available in simple language in a culturally appropriate manner.

⁶ NDIS, *What Help can I get? – Auslan*, accessible at: <https://www.ndis.gov.au/people-disability/what-help-can-i-get>

⁷ Ibid

⁸ See further: FECCA, *Access and Equity in the context of the NDIS*, 2015, p. 5 accessible at: <http://fecca.org.au/wp-content/uploads/2015/06/Access-and-Equity-in-the-Context-of-the-National-Disability-Insurance-Scheme-June-2015.pdf>

⁹ Case study provided by Deaf Children Australia.

¹⁰ NRS, accessible at: <http://relayservice.gov.au/support/aboriginal-and-torres-strait-islander-peoples-and-the-nrs/>

Recommendations

- Ensure the NDIS screening and assessment processes of people who are deaf or hard of hearing are culturally appropriate and that the professionals who administer these assessments undergo continuous cultural competency training.
- Create a mechanism to ensure that people who are deaf or hard of hearing are receiving sufficient information about the assessment processes, access to culturally appropriate advocates and information about choice of service providers to make informed decisions about their NDIS packages.
- Promote consistency in services that are reasonable and necessary for people with disability and their family members together with access to interpreters and translators. Although Auslan is available to participants for activities of daily life, there is no clarity in relation to availability of TIS National services for those whose first language is not English. Consistency in language service provision can be achieved by establishing a dedicated funding model for language services under the NDIS.