

Submission: The Culture and Capability of the NDIA



16 December 2022

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The Joint Standing Committee on the National Disability Insurance Scheme

Dear Committee

Please accept the following submission from Queenslanders with Disability Network to the Inquiry into the Capability and Culture of the NDIA.

Yours sincerely,

Michelle Moss

Chief Executive Officer

About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us." QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback, and views from a consumer perspective to inform systemic disability policy and disability advocacy.

QDN also operates 32 Peer Support groups across a range of metropolitan, regional, and rural and remote locations in the state, run by people with disability for people with diverse disabilities, members and supporters who provide information, feedback, and views from a consumer perspective to inform systemic disability policy and disability advocacy.

QDN undertakes a range of work activities and projects as outlined on QDN's website and detailed in our Annual Report. Our systemic advocacy work encompasses a range of responses – from community campaigns, formal submissions, evidence to commissions and inquiries, and membership of roundtables and working groups around national, state, and local government legislative and policy initiatives.

QDN's work is focused on the rights and full social and economic inclusion of people with disability, along with areas of key importance identified by Queenslanders with disability. This includes the National Disability Insurance Scheme (NDIS, or the Scheme), improving mainstream services that people with disability rely on every day, including health, housing, employment, transport, and the impact of COVID-19.

Recommendations

- Identify funding sources for NDIS access pre-access support, information, and case management to assist with access process and navigating the complex environment.
- Increase funding for Information, Linkages and Capacity, particularly for the Queensland allocation.
- Create pathways for referrals to access free allied health practitioners for assessments and diagnosis for access to a range of support programs (including NDIS).
- Review NDIA record-keeping so participants are not asked repeatedly to tell their stories or explain goals and support needs.
- Increase NDIA staff to reduce the numbers of staff with whom each participant must communicate, and waiting times for applications, requests, and reviews.
- Shift NDIA culture from a deficit-based medical model to a person-centred and strengths-based rights and social model.
- Increase funding for disability-specific advocacy, legal advice and representation for participants going through the Administrative Appeals Tribunal (AAT).
- Publish detailed data on NDIS AAT matters, including costs to participants and to the NDIA.
- Publish deidentified data on pre-AAT dispute resolution.
- Share information with participants about plan costing and how decisions are made.
- Better define the role and improve responsiveness of Local Area Coordinators (LACs).
- Increase services and staff to regional, rural and remote areas.
- Ensure that housing models include separation of housing and support and that SDA delivers choice of living arrangements and not just shared living

Introduction

Queenslanders with Disability Network (QDN) welcomes the opportunity to make a submission on Culture and Capability of the NDIA. To date, the NDIS in Queensland has had a significant impact on the lives of over 100,000 Queenslanders with disability. For many people it is the first time in their life they have accessed disability support. However, many Queenslanders with disability continue to experience challenges with not only access to the Scheme, but also as participants across varying aspects of the Scheme resulting in poorer outcomes.

Over the past eight years, QDN has undertaken projects focused on assisting people with disability to understand the NDIS and access the Scheme. Through this work, QDN has not only identified systemic issues and challenges but also delivered innovative projects that have provided approaches that have addressed some of the systemic barriers to entry. QDN has continued to raise the issues and impacts of the access process, especially upon people with disability who are marginalised and interact with several different complex systems.

QDN's work is focused on the rights and full social and economic inclusion of people with disability, along with areas of key importance identified by Queenslanders with disability – the National Disability Insurance Scheme and mainstream services that people with disability rely on every day, including health, housing, employment, transport, and most recently the impact of COVID-19.

QDN recognizes the need for systemic reforms to the National Disability Insurance Scheme. While Queenslanders with disability acknowledge the positive impacts of the NDIS, they also acknowledge that there is a need to improve the processes and outcomes for people with disability as end users. Fundamental is the authentic consultation and meaningful engagement of people with disability, their families, providers and the broader sector.

Good planning is based upon quality information. QDN members believe the development and review of NDIS plans must be informed by quality data, evidence and professionals who have an ongoing relationship with the participant. Good planning also recognizes every person with disability is unique. The *National Disability Insurance Scheme Act 2013* (Cth) s 3 (1) (e) establishes the Scheme's goal to enable people with disability to exercise choice and control in the planning and funding of their supports. QDN members have identified that 'one-size fits all' does not serve diverse needs, and failure to recognize differences of age, gender, cultural background, disability and location may increase marginalization and risk.

In this submission, QDN addresses accessibility and consistency, transparency and accountability, the cultural approach towards participants, staffing and system capability.

Accessibility and Consistency

Some QDN members advise us the NDIS is not always accessible. There are many people with disability, particularly people with psychosocial disabilities that fall through the cracks and are not receiving the same level of access to the Scheme or utilisation of their plans due to systemic barriers.

There are insufficient supports to assist people to apply for the NDIS. QDN members report they have struggled to access the NDIS, or have been supported poorly through planning and review, relying on unpaid labour from informal supports who have accessed the NDIS themselves or have experience working within the system and/or disability sector.

“I do not have access to the NDIS. Applied twice and both times was told I don't qualify. My support workers are covered partly by state government funding.”

“I have assisted a couple of friends with the Scheme. One was denied as there wasn't enough supporting evidence. He was born with Cerebral Palsy more than 35 years ago and the challenges are only starting to impact his life now. I have also helped another friend who lost a lot of day-time funding in their last review.

Others pointed to the need for advocacy to access the NDIS or to have requests approved. Others report having to wait for a long time for individual advocacy due to high demand.

“I don't know if this has changed, but the focus on one aspect means things like, before I was diagnosed with a qualifying NDIS disability, I spent nearly 3 years bed-bound. With no access to any supports. I was using a child's wheelchair my parents bought from St Vinnies. It took 3 years to get my wheelchair through NDIS and Aidacare. I had my last advice 2 months ago... Sadly, Covid hit, so I've never been able to use my plan to its full potential, as I had hoped. I was such a long process to gain access to NDIS. I fell through the cracks as I had multiple complex diagnoses that I'm still accumulating. None ticked the boxes for NDIS access. I needed a strong advocate that wouldn't take no for an answer, that made NDIS come to my home to see me in person, to understand how sick and unable to care for myself I was.” (QDN member)

Lack of consistency has been raised by our members, who state they often do not have just one planner who they are able to work with throughout the NDIS process. They can build no rapport with planners. Participants must repeat their story many times. Participants feel the quality of their plan has varied depending on the skills, experience and empathy of the planner. Members have also raised issues around record keeping. NDIS workers do not appear to have access to detailed records, again warranting repetition with every contact.

People with disability report their experiences with the call-centre can be also inconsistent. Some workers say one thing, and others saying another, often without hesitation or any attempt to source a sure answer. For example, one person reported that he had to go through ten different call-centre staff about Scheme funding for accessible equipment. This matter, he reports, is now with the AAT, and to transcribe the legal information into an accessible screen reader format will cost the NDIS approximately \$1400. This money, let alone the cost for the NDIA to engage counsel, would have covered the costs of the equipment.

“The NDIS call-centre is staffed by two different types of employees: full-time government and casual labour-hire through the SERCO Group. The SERCO staff are not as well trained as the full-time government employees, in fact I’m not even sure some of them have been trained.”

Accessibility has also been raised with regards to employment within the Agency.

“The number one issue with internal NDIS employment is recruitment companies. They are often hiring casualised employees and labour hire employees with virtually no protections, but also when it comes to employing people with disability, they say it’s inclusive, but then don’t create accessible environments. One of my friends on labour hire was fired from her NDIS role because she asked for a wheelchair-accessible bathroom. The NDIS are moving away from the old APS system which wasn’t working, but I’m curious to see if there are going to be any improvements with the new system.”

Lack of accessibility is particularly challenging for people with disability that may also have other intersectional identities, for example, First Nations and Culturally Linguistically Diverse people who may have further barriers to accessing information, culturally appropriate support, and may have more barriers to accessing legal information and representation.

Transparency and Accountability

Another issue with the culture of the NDIS that has been raised is focused on transparency and accountability and how this also creates a culture of secrecy and gatekeeping. There currently is a lack of published data surrounding the AAT: why and how certain cases are resolved by agreement instead of going through the Tribunal. It is important to see more information about whether people with disability going through the dispute process have legal representation. Information about withdrawn cases and the reasons behind withdrawals is not published and would be useful in understanding barriers to disputing reviewable decisions.

Scheme planners are not able to make final decisions about a participants' plans. This slows down the progress of a plan and denies the participant a role in decision-making: a participant cannot converse with the person responsible for making decisions.

There are few accountability measures to ensure the NDIA implements recommendations from participants, family, supporters or disability advocates. Members report feelings of apathy: their feedback to the NDIA seems to go nowhere.

"I was asked by the NDIS to give feedback around creating more accessible processes for the vision-impaired community, and those recommendations weren't implemented. When are they actually going to implement our recommendations?" (QDN Member)

Cultural Approach Towards Participants

Feedback from members frequently has been that the NDIS uses a "one size fits all approach" that is not person-centred or trauma-informed and does not consider the individual needs of someone with disability. People with disability have diverse life experiences, needs, goals, communication styles, strengths, abilities, and function differently in a diverse range of environments.

People with disability have voiced the importance of evidence from medical and support specialists that really understand them and their disability. Often, the person with the best understanding of a person's support needs is not the person whose evidence is most valued by the NDIA. Many concerns were raised by members around this when the government was considering changes to independent assessments.

"I am an existing NDIS participant. I have a rare medical condition that most likely would not fit within the standardized set of interview questions. If an OT [Occupational Therapist] interviewed me for an independent assessment, I would not feel that he/she would have the necessary skills to understand my disability. An OT doesn't have an in-depth knowledge of medical issues. My specialist does." (QDN Member)

Invisible and complex disabilities, particularly psychosocial or dual disabilities, can be misjudged or disregarded by assessors who lack expertise about a particular form of disability. Women and girls with autism, for example, have low Scheme participation rates partly because autism in females is under-recognized.¹

¹ National Disability Insurance Scheme (2020) 'Outcomes for participants with Autism Spectrum Disorder.'

QDN members have identified that a “one-size fits all” does not work for the diverse needs of people with a disability across disabilities, age, gender, cultural background, geography and where they live, and intersectionality with other service systems that increase a person’s marginalisation and vulnerability. QDN sees a risk of negative impacts and challenges for people with disability including:

- Aboriginal and Torres Strait Islander people
- People from Culturally and Linguistically Diverse backgrounds
- People who live in rural, remote and regional areas
- People leaving the criminal justice system
- People experiencing homelessness
- People with psychosocial disability
- Children in the child safety system and parents with disability interacting with the child safety system.

The NDIA has a ‘power-over’ dynamic with participants instead of a participant-led/participant-centred model. Members have reported concerns about funding cuts to their plans, denial of requests for essential items or plan components, wait-times for decisions, and the ‘uphill battle’ escalating decision reviews to the AAT.

“On 29th June, I submitted a request to go from self-managed to plan-managed (NDIS states this should be resolved in 21 days). After numerous phone calls, lodging a complaint and then a support worker contacting NDIS on my behalf, it was finally resolved on 16th September. It created a lot of anxiety for me, which then affected my neurological symptoms. A part of the reason for putting in this simple request was to free up cognitive space to prepare a much more significant request for plan review.” (QDN Member)

“When people with disability marched in solidarity more than ten years ago to kick-start the implementation of the NDIS, the vision was to create a fund that would provide reasonable & necessary supports for a fulfilling life by participating in society and the community. Under the Morrison government these principles have become eroded. People with disability no longer enjoy the satisfaction of being seen as individuals. Instead, there's been a generic approach to our needs that conveys the idea that 'one size, fits all'. The decision makers, the ones at the top of the 'food chain' seem to be uninformed and have an unrealistic attitude towards assessing individual needs. It seems that no amount of report writing can overturn a decision. This type of behaviour causes anxiety and mental health problems. PWDs have enough to deal with health wise on a daily basis. This attitude needs to change if we as a nation want to see PWDs not only survive but thrive and be successful in the process.” (QDN Member)

QDN members overwhelmingly expressed concerns that the proposed process will lead to people with disability once again relying on standardised testing and funding packages to meet their basic,

everyday needs. The NDIS was established to replace standardised models as it was widely acknowledged that this approach led to inadequate and inappropriate support for people with disability, and in many cases, no support at all. People with disability do not want to go back to the old system.

“We cannot 'box' people with disability into neat categories. A 'one size fits all' approach does not work, and this was one of the reasons why the NDIS was released to begin with. Participants need individualised, tailored assessment and planning to ensure their function and needs are appropriately assessed.” (QDN Supporter and Occupational therapist working with people living with psychosocial disability)

QDN has undertaken significant work in Queensland supporting people with disability experiencing additional marginalisation. Our experience is that successful outcomes for people with disability from these cohorts require person-centred, individualised support to navigate complex government systems and ensure they have access to quality, safe and inclusive services, both NDIS and mainstream. For these groups of people, focussed and extensive support is required to gather the information needed to access the Scheme and reap the full benefits it can bring, including improved educational and employment outcomes, access to health and housing services, and opportunities for social inclusion.

Staff Capability

Local area coordinators

The role of Local Area Coordinators was an issue that has been continually raised with QDN. Members were frustrated that LACs' roles were not clearly defined and that they were increasingly becoming inaccessible and unresponsive to participants. As a result, participants were missing out on critical services they urgently need.

“I am frustrated communicating with my LAC. I leave lots of messages but they often don't get back to me. The LAC delegates communication to five or six people, so there's no continuity of communication.” (QDN Member and disability sector worker)

Additionally, members felt that many LACs had little to no understanding on disability inclusion, community, history and ongoing barriers to equality. Members suggested that LACs and planners be required to undergo disability education before starting in the role, so they have a better understanding of the key challenges and real-life issues of people with a disability.

Some members expressed concern that too much was expected from LACs and members had spoken to LACs who had explained that due to their increased workload, they were not able to have

the presence in the community that was initially planned. Members strongly believe that the NDIA needs to have enough staff to meet demand and ensure LACs could prioritise connecting with their local community. Without being able to spend time in the community, LACs are unable to provide participants with information on and access to other mainstream community supports, which is a key part of their role that many members feel is currently not being delivered on.

“Changes to LAC so they are more responsive. [I] send through an issue and it takes 3 months to get a response.” (QDN Member)

“I requested my plan in Braille and it took 16 weeks to get to me because the LAC entered it in the system the wrong way.” (QDN Members)

Support Coordination

Members have expressed that the role of Support Coordinators remains a significant issue for participants moving forward requires greater oversight, monitoring and training. Members remain confused about the role and responsibilities of Support Coordinators. While the NDIA’s intention may be for Support Coordinators to build the capacity of participants to manage their supports independently, members who were funded for supports coordination overwhelmingly reported that this was rarely the focus of their work.

Members have spoken about how capacity building was given little focus during the implementation of a person’s first plan because most of the Coordinator’s time was spent finding and establishing supports. However, members also reported that supports coordination is rarely funded beyond the first plan and therefore they are not given the opportunity to build the skills to manage their plans independently, with the safety net of a Support Coordinator in place. Members felt that supports coordination funding should remain in NDIS plans until participants could show they had capacity to manage a baseline level of supports.

Members were also frustrated that the quality of supports coordination services varies widely and that finding a skilled Support Coordinator often relies on word-of-mouth recommendations. Members expressed disappointment that there is still little oversight, accountability and checks and balances for Support Coordinators. Additionally, many regionally-based members experienced working with Support Coordinators who are not connected with the local communities they service, which means they were providing advice that is often impractical, particularly for small towns with limited services. Members in regional, rural and remote areas were also often unable to meet their Support Coordinators in person. Members spoke about how this meant their services weren’t tailored to their individual day-to-day life experiences.

Support workers

Feedback from members has also centred around lack of reliability when it comes to support workers.

“There is a lack of quality of support workers - they are not good enough with passion and experience” (QDN Member)

“I find it easy to find workers, however had had some bad experiences. For example, charging for hours they didn’t work.” (QDN Member)

Members have commented that there is high staff turnover and that it is difficult to find quality support workers who understand their disability and their needs. Other comments also surrounded support workers increasingly working for themselves as opposed to organisations, which makes it difficult when they get sick or need someone to replace them when they’re on leave.

“COVID has been difficult. People are leaving the industry and they are hard to replace. Smaller choice when I advertise. Hire Up are very service driven and expect you to upload care plans, asthma plans etc filled out by therapists.” (QDN Member)

“Consistence is the hardest. If going through an agency the turn over of staff has been increased by staff going independent. Hiring independent leaves you in a hole if they are sick or need a day of or holidays. Compared to agency who will just replace a support worker until your regular one returns to work.” (QDN Member)

System Capability

Reduction of travel budgets in participant plans

Members have experienced significant cuts in their travel allowances on plan review or change of circumstances review. The NDIA has not announced any formal changes to the funding of transport budgets, but it appears that unless participants are engaged in formal employment or “structured day programs” three days a week or more, the NDIA will only fund the lowest level of transport support. However, support workers continue to charge for travel if they run errands or take members to appointments, which are supports funded by the NDIA, so this cost is having to be taken from participants’ core budget, leaving them with less supports, particularly towards the end of their plans.

Members said cuts to transport budgets warrant NDIS participants’ continued eligibility for Queensland’s Taxi Subsidy Scheme (TSS) which is set to expire in 2023. Reduced NDIS transport funding and loss of the TSS would have significant negative impact access to basic services, like grocery shopping and doctors’ appointments.

NDIA Reviews and AAT Appeals

QDN members reported a significant increase in the number of people with disability they knew in their local community going through either the internal NDIA review process or an AAT appeal. The increase in reviews and appeals – combined with there being not enough NDIA staff to meet demand – has led to long waits and delayed responses to plan reviews.

“There is a lot of certainty when your plan comes up for review, uncertainty about the LAC.” (QDN member)

Members feel frustrated with the s100 review process because no one they know has been able to secure a positive outcome – despite significant work and effort invested by people with disability, their families and advocates.

People reported that they held low optimism about the outcomes of internal reviews stating that that it felt like a forgone conclusion that their internal review would be rejected, and they would be left with only one option – to go to the AAT. People have reported that they wonder about the purpose of mandating the internal review process and forcing people with disability to “jump through extra hoops” if these reviews were taking up NDIA resources for a predetermined result, which was that people with disability were left to decide whether to go through with the AAT process.

If members were faced with the choice of taking their issues to the AAT, most were unable to access independent advocacy services. As a result of the increase in cases being taken to the AAT, independent individual advocacy services in Queensland are at or over capacity. Without independent advocacy support and guidance through the process, a number of members explained that they did not have the capacity to understand or ability to access the information they needed to progress their cases to the AAT. This meant many members felt too overwhelmed to take their issues to the AAT.

Some people with disability who don't have access to informal supports or advocacy services, are relying on Support Coordinators to help collect evidence to bolster their internal and external reviews. This means that fewer Support Coordination hours were then available to link people with services, build capacity to manage NDIS plans and ensure plans are used to their full potential.

Consistent feedback has included lack of support and advocacy services stood in stark contrast to the millions of dollars being spent by the NDIA on defending cases at the AAT. Reports in the media include that the NDIA is hiring "top end of town" lawyers, from large law firms, to argue cases against people with a disability which is frustrating and disappointing for people with disability who express their anger around this power imbalance and felt that the money spent on "expensive lawyers" could be better utilised providing people with disability with the supports they need.

Queenslanders Living in Regional, Remote and Rural Areas

QDN members from regional areas raised the lack of services in local communities which impacts on 'competition'. Particularly around NDIA requirements to get a certain number of quotes means they are unable to move to the next part of the process to get supports and/or Assistive Technology and if they do get the supports they need, it takes significantly longer than it does for participants living in city areas.

"It takes 12 months to get approval for a new wheelchair and then you have to wait to get the new wheelchair. Make this process quicker and simpler." (QDN Member)

Members from rural, regional and remote areas also explained that when there aren't many service options it's easy to go through them all quickly, making it hard for people to "just leave" if services aren't delivering what people need. One member shared their experience that the only alternative to these unsatisfactory day service supports was to stay at home all day.

Housing

QDN's work around home and living for people with disability is underpinned by the housing principles designed by our members. This has supported us to work with government, business, and community on a shared approach to these complex issues. Our housing principles are detailed below.

Housing is a fundamental need and human right and key to enabling people with disability to be included in community and family life, and to participate fully as citizens within Australian society. QDN acknowledges Article 12 and article 19 of the *Convention on the Rights of Persons with Disabilities* (CRPD) which seeks to promote and protect the equal rights of all persons with disability to live independently and be included in the community.² The articles state that people with disability must “have the opportunity to live independently in the community and to make choices and to control their everyday lives, on an equal basis with others”.¹ Being included in the community facilitates the “social networks and naturally occurring community support (including friends, family and schools)” that is critical for supported decision-making.²

In the context of living arrangements, the choice of where to live and who to live with is often not the individual choice of people with disability but more often that of family members, guardians, NDIS nominees, NDIS planners, service providers, and policy makers.³

“When you live in a group home you don’t get any choice about who you live with and (the service) moves people around to different houses and sometimes you live with people you don’t know.” (QDN Member)

For people with disability to be able to make meaningful choices in their lives, including where and with whom to live, and for the free development of the person, Australia needs to meet its obligations under article 12 and replace substitute decision-making with supported decision-making that respects the rights, will and preferences of people with disability.⁴

QDN notes that under National Disability Insurance Scheme (NDIS) Supported Independent Living, group homes remain a principal form of supported accommodation, despite calls for more innovative housing and support models for people with disability. QDN welcomes the national reform agenda that emphasises choice and control including choice of service providers. QDN notes that most of the current NDIS Specialist Disability Accommodation (SDA) residents live in premises that were previously state government funded group homes and receive Supported Independent Living (SIL) funded NDIS supports, as part of legacy arrangements.⁵

QDN acknowledges that 17,000 people with disability live in group homes in Australia and while there is no doubt that people with disability have benefited from the move from large institutional

² Committee on the Rights of Persons with Disabilities, General comment No. 1 (2014) Article 12: Equal recognition before the law, op. cit., para 44.

³ Ibid, para 45.

⁴ See for example, French, P, *Accommodating Human Rights: A human rights perspective on housing, and housing and support, for persons with disability*, People with Disability Australia, 2009, p. 52. Available at: <https://pwd.org.au/resources/library/reports/>; Joint Standing Committee on the National Disability Insurance Scheme, *Report into Supported Independent Living*, (May 2020) Commonwealth of Australia, p. xviii. Available at: https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/National_Disability_Insurance_Scheme/IndependentlyLiving/Report

⁵ Disability Royal Commission: WWDA’s Response to Group Homes Issues Paper, July 2020. p 19,

settings, the experiences for many people living in group homes include social isolation, denial of basic human rights, and the experience of violence, abuse, neglect, and exploitation.⁶

QDN supports the NDIA's intention in the development of the Home and Living policy to "create a clear and personalised approach to helping you live ordinary lives, in ordinary homes, in ordinary communities".

"We want a backyard for a pet and grandkids to run around in." (QDN member)

Solutions

Improving shared access to data

A common frustration with the NDIS was the constant need to reshare information. Members strongly believe that the NDIS could be more efficient and easier to interact with if there was a focus on how to best share data internally and with other government departments.

Members were frustrated that one of the promises of the NDIS was that you wouldn't have to tell your story repeatedly to get disability support. However, as it currently stands, that is how the NDIS is working. Members report having to resend reports and doctors letters to different NDIA staff or different agencies not having access to NDIS information.

Members believed that there is a better way forward and that a new co-designed data sharing process made with people with disability at each step of the way would result in a better experience for participants and greater efficiencies for government.

"Having to reprove our disability again at reviews is expensive and its hard keep proving your disability at every review." (QDN Member)

Implementing targeted strategies to assist with NDIS access

Queenslanders with disability have raised the ongoing need to fund targeted strategies to support marginalised groups, particularly people with psychosocial disability, to access the NDIS, for example, the Community Connector Program, targeted access programs delivered by First Nation organisations for people with disability from Aboriginal and Torres Strait Islander backgrounds and QDN's Targeted Outreach program.

⁶ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2019). Group homes: issues paper.

The Community Connector program previously worked with four specific groups to assist them to access the NDIS, including: Aboriginal and Torres Strait Islander communities, Culturally and Linguistically Diverse communities, people experiencing psychosocial disabilities; and Ageing parents or carers of people with disability. As trusted community members, Community Connectors played a critical role in reaching out to people with disability in harder-to-reach communities, increasing awareness of the NDIS and providing support for people to access the Scheme. Some members have been deeply disappointed that the Community Connector Program is no longer funded by the federal government. Another strategy that members raised as a solution for improving access to the NDIS is the Targeted Outreach Program run by QDN. The Targeted Outreach Project (TOP) is helping eligible Queenslanders with disability join the NDIS by working with organisations, services and groups on the ground in local communities to help people with user friendly information about the NDIS.

Members have expressed strong support for targeted strategies that work with people with disability to assist with accessing the NDIS. This is particularly the case for specific groups of people with disability who have experienced additional barriers to inclusion and acceptance in their local communities.

Simplifying and demystifying NDIA language

Implementing simple accessible communication strategies like ensuring participants are not bombarded by unnecessary acronyms and overly bureaucratic language, which currently prevents them from fully utilising their plan.

Increased access for individual and systemic advocacy

Increasing funding for individual advocacy to meet the increased demand due to the increase in AAT appeals. Participants and their families are now spending an excessive amount of hours a week managing, reviewing or appealing their NDIS plans and many report feeling like they are “drowning” without any professional advocacy support. Increasing funding for individual advocacy levels out the playing field and ensures that people with disability are not forced to use their supports – informal and formal – to appeal NDIA decisions but can instead focus on their overall goals and greater inclusion in the community.

“NDIS is still on a medical model; this is not the only way we should be addressing NDIS. Conditions that are episodic conditions need to be recognised, as they can’t live with just having a few good days a month.” (QDN Member)

Ongoing access to peer support

Participant highlighted the importance of peer support in their navigation of the NDIS from access, plan implementation and plan review stages, indicating the importance of this as an ongoing way that NDIS participants can share information and build their skills and capacity. However, it is important that people have access to free services where they can get initial advice and support around NDIS applications and completing them.

Training for key staff in the NDIS workforce

Members have raised the need for the NDIS workforce to have greater access to training and for ongoing professional development to be a requirement of their role. As previously mentioned, members strongly believed that LACs, planners and Support Coordinators should all be required to undergo a minimum level of training before beginning in their roles. In particular, generally speaking, members' experiences were that staff in these roles would benefit from a greater understanding about the social model of disability, disability rights and the barriers and discrimination still faced by people with disability. With the right training in these areas, staff would be able to better respond to the needs of NDIS participants and improve their communication with people with disability.

Additionally, many members were struggling with the current disability workforce shortage and were either self or plan managing in order to be able to hire staff more flexibly. However, this meant that NDIS participants were often hiring people who had never worked in the disability care sector before and had no qualifications. Members suggested that it would benefit both support workers and NDIS participants to have access to training – in the style of a short course – that would cover off on the basics of disability support work. Additionally, many members would like to be able to offer their support workers professional development but find it difficult to understand what training is both practical, reputable and affordable. Members felt that being able to offer disability support workers more training and professional development would be a way of enticing more people to work in disability care and be one solution to address the current national shortage of disability support workers.

Greater transparency in decision making

Members believe that more information should be made available in a user-friendly, accessible way about the “financial sustainability” issues with the NDIA, so that participants can engage in an honest and open discussion about the future of the NDIS. People with disability and their families have a strong vested interest in seeing a funded and successful NDIS now and into the future, however, without all the information they don't feel they can have a productive debate about the future of the Scheme.

Greater transparency includes more publicly available information about financial assumptions, also information about how the NDIA makes decisions about what things represent ‘value for money,’ when it decides not to fund supports as well as making data surrounding AAT cases and their outcomes publicly available with de-identifying information. Understanding what information is

used to make these decisions would assist participants understand and communication at each stage of the plan development with the participant and their family/decision makers would lead to better outcomes and avoid lengthy reviews and appeals to begin with.

Building skills of people with disability to be informed and confident customers

Many members believed many of the current issues stemmed from the lack of targeted training and support to build the capacity of people with disability as empowered customers in the NDIS market. Particularly in Queensland, for many NDIS participants, this is the first time in their lives they are receiving any disability supports or funding and for all people with disability it is the first time they are given choice and control over how their funding is spent. However, as first-time consumers, many members felt there needed to be greater focus and investment in targeted strategies that help participants navigate the NDIS and feel confident in their decisions as customers. For many people with disability, peer support plays a key role in providing this knowledge in an accessible and practical way. However, many members felt that peer support programs were not given the respect they deserve by the NDIS. Additionally, many members wanted to see people with disability leading the conversation about new and innovative ways of building people's confidence in using their NDIS funds.

Consistent timeframes around consultations

Members believed that all information about proposed changes to the NDIS should be published in a clear, accessible way, with plenty of time for meaningful, genuine consultation with people with disability. Some members called for a minimum consultation period if the document in question involves changes to the NDIS, to ensure people with disability can have their say.

Political messaging

Finally, members have discussed the need to change the current messaging around the NDIS. Members strongly believed that the NDIS should not just be discussed simply as a cost, but also for as an economic benefit, which was highlighted by the Productivity Commission when it designed the Scheme. The current narrative about NDIS and "cost blowouts" and "cost burdens" has caused unnecessary fear in the disability community and has also failed to acknowledge the hundreds of thousands of jobs the NDIS creates, the small businesses it has helped to create across Queensland and not to mention the almost 100,000 people with disability who – for the first time in their lives – are getting the supports they need to live full and equal lives.

"We are all people first, we are not asking for special treatment just equal treatment."
(QDN Member)

Members have widely acknowledged that the NDIS is an important scheme and whilst there are areas of improvement to deliver a quality scheme, they wanted politicians to understand that when you invest in people with a disability, it not only benefits the individual, but the entire community, both socially and economically and this message should be promoted loud and clear.

Choice in Housing

QDN believes in phasing out group home accommodation and opening communication channels between the NDIS, Department of Housing and private rental sector to work towards housing solutions for people with disability that champion rights, choice, inclusion and control.

Conclusion

Although the NDIS has created many positive changes in the lives of people with disability, there is still room for improvement regarding the Culture and Capability of the NDIA which has been evidenced in this submission. QDN welcomes the Government seeking the voices of people with disability as well as disability services and stakeholders to improve the Culture and Capability of the NDIA and looks forward to seeing changes implemented to the NDIA that will improve capability of the NDIS system, the staff within it and create a more and equitable NDIA culture.
