



Hon. Bruce Billson, MP
Chair
Joint Standing Committee on the National
Disability Insurance Scheme
PO Box 6100
Parliament House
Canberra ACT 2600

4 March 2016

Dear Bruce

The Young People In Nursing Home National Alliance welcomes the opportunity to provide this statement to the Joint Standing Committee on the National Disability Insurance Scheme's current Inquiry into Accommodation for people with disability and the NDIS.

The NDIS is a landmark initiative that will offer Australians with disability opportunity for greater social and economic participation, as well as increased control and choice over their support services.

The experience of many people with disability in the existing disability system has been that the linking of support services with housing and the concomitant lack of community based supports, has forced them into living in shared accommodation with others with disability. The NDIS has the promise of changing this structural problem through the provision of individualised support.

How the housing part of the equation is reformed to enable the same degree of choice is more difficult.

However, de-linking housing from disability support provision is the first necessary step in ensuring that housing ceases to be conceived as a disability service.

The Young People In Nursing Homes group (YPINH) comprises people with a combination of complex health and functional disability support needs acquired through injury or progressive disease.

A significant number are young parents who simply want to maintain their home life to continue raising their families.

Others have significant health needs that will require innovative and collaborative responses from health services and the NDIS to deliver the integrated support options needed to live safely and with confidence in their own homes and communities.

To this point, recent considerations of housing for Australians with disability have remained mired in conventional views of both disability; and of how individuals with disability want to live their lives. This has commonly been expressed through an overarching focus on development of more ‘bricks and mortar’ to answer the need for growth in service options for people with disability.

In attempting to move away from development of more group homes, this approach has seen unit developments that offer a person with disability their own unit/town house/home to live in, but do so within a dedicated “disability” enclave. The enclaves that result do no more to advance the inclusion of people with disability in and with their communities than group homes have done in the past.

Australians with disability are only one of several groups of people in need of housing assistance. Others include those with mental illness, the homeless and older Australians unable to stay in the private rental market on an aged pension. The need for housing for Australians with disability is thus part of a wider need for social housing and alternative housing finance approaches.

The Committee’s current inquiry will no doubt hear a range of views about how the housing issue should be characterised. It will also hear a range of characterisations of people with disability and be presented with a number of ideas and potential solutions to enduring concerns.

The Alliance will put one view in this submission that goes to the importance of inclusive urban design and connection and belonging of all people. In exploring one theme within the wider housing debate, the Alliance urges the Committee to be cautious in considering arguments about absolutist solutions.

Taking these issues outside ‘disability services’ means that there are many influences over housing choices, financing and availability of housing. Disability programs such as the NDIS, cannot solve these. Nor will they – or should they – be solved by disability service providers.

The range of issues being canvassed in this inquiry will require the input of other areas of government and industry and it is important that the committee seek input from these sectors.

Finally, the Alliance believes the conversation concerning housing for Australians with disability needs to be completely recast. To this end, we offer the following key points for the committee’s consideration.

1. Reform and harmonise building codes for accessible design features

Because Australians with disability aspire to live in the community in their own homes, as other community members do, addressing housing need should be considered in terms of the accessibility, visitability and adaptability of all housing for all community members. To this end, terms such as ‘disability accommodation’ and ‘specialist disability accommodation’ should cease to be used.

The Alliance further believes that housing for Australians with disability must be a deliberate and considered part of any private, public and social housing urban development. In its cities particularly, Australia has enjoyed a building development boom that has seen a rapid rise in the number of apartments being built. In the outer urban corridors surrounding our cities, building development continues to deliver 3 and 4 bedroom family homes.

Yet because of the lack of mandated building regulation for accessible, adaptable or visitable design features, few, if any, of these new residences are accessible, adaptable or visitable for people with disability.

This means a vital opportunity to deliver housing for Australians with disability continues to be foregone.

Recommendation: The Joint Standing Committee recommend that the Disability Reform Council and the relevant State and Territory Ministerial Councils work to bring State and Territory building codes into line with the position of the Australian Network for Universal Design.¹

2. Development of Inclusive communities

The Alliance believes that Australians with disability should be involved and consulted in development of the housing options they need.

The Alliance also believes local government has a critical important role to play in ensuring that new housing developed in their municipalities is adaptable, accessible and visitable.

Recommendation: To ensure that housing for Australians with disability becomes a deliberate and considered part of any private, public and social housing development, we recommend the Joint Committee consider the urban design protocols agreed to in *Creating Places for People, an urban design protocol for Australian Cities*.²

An initiative facilitated by the Australian Government and the result of two years of collaboration between peak community and industry organisations, States, Territories, Local Governments, and the Commonwealth Government, *Creating Places for People* is a collaborative commitment to best practice urban design in Australia. It offers agreed design principles that aim to create the context for people to engage with place and with each other.

As a companion piece to *Creating Places for People*, the Victorian Government's *Guide to Delivering Community Precincts* is also worthy of consideration. The Guide outlines the key ingredients needed to deliver inclusive communities that contain the amenities people look for to live "good lives"; and promotes a process wherein key stakeholders are identified and invited to develop a shared

¹ See: <http://www.anuhd.org/>

² See <http://www.urbandesign.org.au/>

³ See [http://www.dtp.vic.gov.au/data/assets/pdf_file/0004/225175/Guide-to-Delivering-](http://www.dtp.vic.gov.au/data/assets/pdf_file/0004/225175/Guide-to-Delivering-Community-Precincts.pdf)

vision and concept that then lays the foundations for each project and articulates a vision for the community.³

The Guide offers a precise format that would allow people with disability to be actively involved and consulted in the development of housing in their local area.

3. Options on the spectrum to deliver real choice in housing

a) Delinking housing from support services

Australians with disability are currently not only limited by housing availability, but by the historic anchoring of accessible accommodation to block funded disability services. In most jurisdictions, the rationing of places in these services is centrally controlled by government ‘vacancy management’ systems that undermine the central tenets of choice and control expounded by the NDIS.

The Alliance does not believe group home settings should continue to be seen as the default model for housing for people with disability requiring proximal support.

While the group home model has been the dominant style of housing provided through disability services, it should be just one of many options on the housing spectrum that are able to developed in the future.

Recommendation: The Joint Committee examine the options that would enable all levels of government to develop a strategy to “delink” housing provision from disability service provision and transfer housing provision instead to separate housing management agencies.

Only when housing and support services are separated will a genuine choice of housing options be available to Australians with disability.

b) Engagement with aged care providers

In taking an innovative approach to the funding of housing options, the Alliance also believes consideration should be given to the NDIS working more closely with aged care providers.

Those aged care providers delivering support to younger people are keenly aware of the disconnect residential aged care (RAC) offers to younger residents and are keen to develop housing alternatives to nursing homes that enable younger people to be supported appropriately in their own homes in the community. Many providers are capital ready and keen to invest in developing alternative housing options to residential aged care for their younger residents.

Again, this should be seen as one of many ‘options on the spectrum’ that may suit a particular cohort at a particular point in time.

³ See http://www.dtpli.vic.gov.au/_data/assets/pdf_file/0004/225175/Guide-to-Delivering-Community-Precincts.pdf

c) Australians with functional disability and complex health and other support needs

For people with high support needs, the gap in availability of community based health support services means that the choices of housing are limited to locations/options where these are delivered. In most cases this means a health facility such as a hospital, or an aged care home.

For there to be real alternatives and choice in housing for people in the YPINH group, there needs to be a dedicated service development strategy for these health services (including rehabilitation services) comprising the NDIA and state/territory health programs.

Recent considerations of housing and support delivery for those with complex health needs has unfortunately seen a return to the view that no other alternative exists for this cohort than placement in group home settings.

Such a view ignores the fact that many in this cohort have acquired disabilities, do not identify as 'disabled' and do not want to be forced to live with others with disability.

Recommendation: The Joint Standing Committee recommend that the Disability Reform Council work with counterparts in relevant State and Territory health portfolios to develop community based health services for those with complex health needs to live safely in the community.

Provided with this statement to the Joint Standing Committee, is a copy of the Alliance's Housing Policy Discussion Paper, *Shaping the Future Today: transforming housing policy for Australians with disability*. This policy paper was produced in 2014 in collaboration with Monash University's Art, Design and Architecture Studio (MADA).

Shaping the Future Today examines housing and support issues from the point of view of community connection and belonging. The international and Australian case examples provided in the latter part of the document, demonstrate that inclusive communities can be successfully created through collaboration and good design to the mutual benefit of all involved.

Further Contact:

The Alliance is keen to provide further information as required to the Inquiry. If further information or clarification of the points raised in this statement is required, please contact:

Dr Bronwyn Morkham

National Director, YPINH National Alliance